

Representation, summary and analysis – Enjoying and Understanding the Park

Policy Policy 33	Name Agent Forest Holidays LLP Steve Hearn	Company Forest Holidays LLP	Objector Ref 397
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Representation

Greater emphasis and recognition should be placed upon supporting the provision of a good quality and a varied range of tourist accommodation. The Local Plan should also recognise the fundamental importance that the appropriate provision of tourist accommodation can have upon the tourism industry as a whole within the National Park. Further the Local Plan should also provide support to allow existing tourist accommodation providers to expand and diversify where appropriate.

Modifications to your objection: Accordingly Policy 33 should be amended or an additional policy should be included within the Plan to provide clear support for the provision of tourist accommodation within the National Park 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 any changes in market trends, in instances where such can be accommodated within detriment to the aims and objectives of the National Park.

Summary

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

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 33	Name Phil Rowsby	Company SRPBA	Objector Ref 429j
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Representation

The SRPBA objects to the wording of this policy and would suggest the following amendments are made to the wording of this policy:

Proposals for new or enhanced tourism-related facilities/attractions will be favourably considered, where they enhance the range and quality of tourism attractions and facilities on offer, and/or lengthen the tourist season, with a beneficial impact on the local economy and without significant adverse environmental or landscape impacts.

We believe that as the policy currently stands this may stifle all development. With reference to the second sentence in this policy (below):

Any change of use within or away from the tourism sector should not adversely affect the quality of standards provided, or the selection offered, without adequate justification to the satisfaction of the planning authority

We object to the term 'standards' being used as we do not feel it is the appropriate word to use in this context.

In addition, the SRPBA feel that focusing a policy on only tourism is a risky option and it does not allow for flexibility in a continually changing economic and business environment. Due to these concerns we suggest that paragraph 3 should be removed.

Summary

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

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 33

Name John Forbes-Leith Esq

Company

Dunachton Estate

Objector Ref

418r

Agent Debbie Mackay

Representation

This policy should be more welcoming towards tourism development as this is an essential part of the economy of this area.

Modifications to resolve this objection - The word "significant" should be inserted before "adverse environmental or landscape impacts".

Summary

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

or landscape impacts'.

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 33

Name D R MacKellar **Company** Cairngorms Chamber of Commerce

Objector Ref

430i

Representation

Tourism - Tourism is recognised as one of the principal drivers of the Park economy. A healthy tourism industry is rightly regarded as vital to all communities. It is immensely competitive. Sustaining current and growing tourism levels may require continual adjustment to new products, services or facilities. Positive policies for the appropriate siting and design of tourism infrastructure should therefore be at the forefront of the Plan. The Plan's commitment to promoting sustainable tourism is therefore welcome. Sustainable tourism is tourism that takes account of its current and future economic, social and environmental impacts, addresses the needs of visitors, the industry, the environment and host communities. It should respect local culture, support local facilities, and encourage the wise use of natural resources. While the Plan is generally supportive of the industry, it is felt that it does not contain sufficient analysis of different types of tourism, or their varying needs. The CCC believes that there is a serious deficiency in the current understanding of the tourism economy. Statements of policy should be clearly supported, substantiated and not just stated.

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

The Plan aims to increase the stock of tourism businesses and facilities, by attempting to stop the reversal of such facilities away from the tourism sector. This will mean a restriction on entrepreneurial activity when individuals are contemplating selling up businesses in tourism. The CCC has many members who as individuals bring their skills, time, effort and money into the Cairngorm National Park. This often involves change of use of their own properties, whether buildings or land. To say to them that they can never reverse their efforts by closing down or changing their businesses to reflect demand is a disincentive to their entrepreneurial spirit. In particular this would be the case when they wish to move onto other areas of work or when they wish to retire, stop work and release their profits. This restrictive proposal in the Plan goes against one of the main aims of the Plan where "Proposals for new or enhanced tourism-related facilities/attractions will be favourably considered, where they enhance the range and quality of tourism attractions and facilities. Clarification and explanation is required to support the statement "The Local Plan will seek to protect the business use of existing businesses which provide key services to communities within the Park" (7.9 Economic Development). In Accommodation provision

anecdotal evidence suggests occupancy levels at around 40% per annum. This could be construed as an over provision. Major information gathering and robust interrogation of that information should be addressed as a priority. The Draft Local plan is presumptuous with regards to the Tourism economy and is wrong in assuming there is a vibrant tourism economy. Only by understanding the data or commenting

upon the lack thereof could the Local Plan begin to plan policies to be more closely tailored to emerging trends and would provide the foundation for a stronger spatial dimension to the plan.

Can the Plan provide for the sustainable growth in tourism by starting to understand:

- 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

Summary

Tourism is recognised as a key driver to the economy of the Park and is vital to all communities, and positive policies 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

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 33	Name Ian Francis	Company	RSPB Scotland	Objector Ref	424p
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Representation

We consider that this policy would be clearer if it was stated (Paragraph I) that proposals will be favourably considered where they “conserve and enhance the natural and cultural heritage” rather than are without adverse impacts.

Paragraphs 6.5 and 6.6. There should be some statement here of the imperative need not to cause adverse impacts on the natural heritage, which underpins almost all tourism in the Park, Tourism has the potential to cause adverse impacts on the environment e.g. through disturbance, erosion or inappropriately sited development. Much of the Park’s tourism relies on its natural heritage assets and it is essential that it does not cause adverse impact on that resource.

Summary

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.

Para 6.5/6 should state the imperative need not to cause adverse impact on natural heritage which underpins most tourism in the Park.

CNPA analysis

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.

Policy Policy 33	Name Mr Michael Bruce	Company	Glen Tanar Estate	Objector Ref	403m
	Agent Sinead Lynch				

Representation

The general approach adopted in this policy is supported, particularly in relation to the National Park Plans Strategic Objectives for Sustainable Tourism. We would again reiterate our submission that Glen Tanar should be identified as a settlement within the Cairngorms

National Park Local Plan, as set out in Part 6.7 of the Local Plan, any significant tourist development could take place within or adjacent to an existing settlement.

Summary

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

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 rationale 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. (WORK WITH COMMUNITY COUNCILS AND NATURAL HERITAGE GROUP)

Policy Policy 33	Name Reidhaven Estate	Company	Reidhaven Estate	Objector Ref	457
	Agent Roy Stirrat				

Representation

Background Policy Information

Badenoch and Strathspey Local Plan 1997

1. The section dealing with Tourism Promotion — A9 recognises the benefit of key gateway information sites promoting bypassed communities, alternative tourist routes, visitor facilities and attractions at the strategic points of Ralia and Blackmount adjoining the A9. It notes that while Ratio has been established for some time, facilities at Blackmount 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 is within General Policy 1 area which states "Development will be permitted if it is unlikely to have a significant adverse effect on the aims of the National Park or any of its special qualities. Where it is concluded that there would be adverse effects on the aims of the National Park, any of its special qualities, or public health or amenity from a development it will only be permitted where it is considered that these would be outweighed by social or economic benefits of national importance or of importance to the aims of the National Park and where appropriate measures are taken to minimise and mitigate the adverse effects of the development."

3. Other Local Plan policies are also relevant:

Policy 22 : Integrated Transport Network recognises the importance of signage to Blackmount and that new sensitively sited signs will require to be integrated with others encouraging people to stop within the Park and visit the neighbouring towns and attractions that are by-passed by the A9.

Policy 23 : Roadside facilities on the A9 supports suitably designed and sited roadside information and picnic facilities, to enable travellers to stop and get details of the Park's attractions and services available in local communities, where it can be demonstrated that there will be no adverse impacts on the services and businesses of nearby towns and villages.

4. Carrbridge is the closest community, located 2 miles to the east on the A938 which takes access to the A9 at the Blackmount junction.

The Local Plan notes that it has excellent transport links with the A9, the Perth-Inverness railway, as well as the A938 and B9153 (to Aviemore etc), and that the local economy is largely founded on land-based business and the tourist sector. It further notes that proposals to enhance and diversify the local economy will be supported in principle.

Consultative Draft Cairngorms National Park Local Plan

5. Reidhaven Estate submitted comment on 24 February 2006 and noted the following with respect to the adopted Badenoch and Strathspey Local Plan (1977) as it related to Policy 23, Roadside Facilities on A9:

The existing Badenoch and Strathspey Local Plan identifies the site at Blackmount north of the Carrbridge junction as being a key gateway information site for promoting bypassed communities and alternative tourist routes etc (para 2.2.11). Highland Council has since agreed that the A9 be opened up for commercial development in the interests of road safety, road users and tourism. SPP 17 now allows planning authorities through their development plans the option to approve roadside facilities subject to design issues. CNPA recommended that a commercial development be approved at the Dalwhinnie Junction in July 2005 (reference 05/201/CP) and the application was only refused on design concerns.

The site at Blackmount offers an ideal opportunity to combine a commercial development in the interests of road safety with a facility to direct visitors into the bypassed communities and the wider park area. The draft policy should be extended to refer specifically to Blackmount and to include provision for commercial refreshment facilities there rather than just information and picnicking.'

Cairngorms National Park Plan

6. The Cairngorms National Park Plan places emphasis on enjoying and understanding the Park (5.3)

7. The Introduction (5.3.1) - Creating a World-Class Experience — notes the requirement for a significantly enhanced awareness and understanding of the National Park, its special qualities and management needs. It further notes that part of the integration required in managing the Park is to promote the enjoyment of the area in ways that are not only consistent with the special qualities, but actively develop understanding about the Park and contribute to its conservation and enhancement.

8. There is a need to understand more about what makes the National Park so special and how it functions is relevant not only to visitors, but to residents, businesses, specialist interest groups and people in Scotland and beyond.

9. The section on Sustainable Tourism (5.3.2) notes that the National Park is already a popular tourism area, attracting about 1.4 million visits from around the UK and overseas each year. Tourism accounts directly and indirectly for a significant part of the area's economy.

10. A Strategic Objective (g) is to ensure that visitors to the Cairngorms are aware of the range of opportunities, places to visit and things to do throughout the Park and appreciate its special qualities. The transfer of information to visitors about the Park, its special qualities and ways in which they can be experienced is key to developing an appreciation and understanding of the area and what it offers. It is therefore an important process for managing tourism and encouraging greater exploration, longer stays, increased spending, responsible behaviour and repeat visits.

11. Strategic Objective (i) is to ensure that visitor information is targeted at specific audiences and encourages resource protection, responsible access, visitor safety and the health benefits of regular outdoor exercise.

12. Sections 5.3.4 Learning and Understanding 6.7 Raising Awareness and Understanding of the Park expand on the importance of these requirements. The Action Programme 2007 – 2012 highlights the need (Ref. 2) for Key Places for Information Transfer and Interpretation,

and in particular the need to Install Visitor Information and Park-wide interpretation at key entry points to Park.

BLACKMOUNT PROPOSED VISITOR ATTRACTION FEASIBILITY STUDY

13. In response to the longstanding specific planning policy support for a tourist information and National Park interpretive facility at Blackmount, as well as broad National park policy support. Reidhaven Estate recently commissioned an architectural, economic and planning feasibility study.

14. The proposed A9 trunk road access and development proposal to dual the A9 adjoining the Carrbridge junction was taken into account as well as assumptions on visitor numbers, spend per head and a consequent outline brief for commercial support facilities. Other development proposals on the A9 were considered as well as importantly the need for an architectural vision of a 'northern gateway to the National Park.

15. It is proposed that it will be a commercially generated facility providing as its primary function a unique visitor attraction currently assumed as based around a high quality multi-interpretive and exhibition proposal. There will also be a café/restaurant and retail outlet, related facilities and appropriate parking.

16. Further economic, tourist and traffic statistics, and architectural feasibility consideration is presently underway including identification of a possible operator and partnerships with local organisations.

CAIRNGORMS NATIONAL PARK DEPOSIT LOCAL PLAN - OBJECTION and COMMENT

17. In light of the adopted development plan policies supporting development at Blackmount, and National Park policies promoting the need for strategically sited information and interpretation facilities at key entry points to the Park, it is apparent that the site at Blackmount is significant.

18. The Deposit Local Plan notes (1.10) that comments on the Consultative Draft helped refine the policies, proposals and strategy. It further notes that the structure of the Deposit Plan provides a set of policies to manage development and a set of specific proposals for development requirements and opportunities, as well as linking the Plan to the aims of the Cairngorms National Park. However, neither an A9 policy nor Blackmount are specifically noted.

19. The future development of Blackmount will therefore depend on the thinking in Section 6. Enjoying and Understanding the Park and on Policy 33 — Tourism Development, which notes that;

"Proposals for new or enhanced tourism-related facilities/attractions will be favourably considered, where they enhance the range and quality of tourism attractions and facilities on offer, and/or lengthen the tourist season, with a beneficial impact on the local economy and without adverse environmental or landscape impacts.

All proposals should protect the current quality of the environment and amenity enjoyed by local communities, maintain and enhance the quality of the visitor's experience and ensure the long-term visibility of the local tourism industry".

20. It is noteworthy that reference is made (6.6) to Scottish Executive guidance in PAN 73 to tourism being of vital importance to the social, economic, environmental and cultural wellbeing of rural Scotland, as a result planning authorities are requested to devise policies regarding the siting and design of such developments, and be aware that this sector is a key market growth area linking business and cultural tourism.

21. However, site specific proposals are only provided on a settlement by settlement basis and Carr-Bridge does not include comment on Blackmount. Section 7. Settlement Proposals notes that only settlements with specific proposals are described in this section and that proposals for development in other small settlements within the Park will be assessed against the policies of the Local Plan.

22. Blackmount is located 2.5km west of Carr-Bridge on the A938, outwith the settlement boundary. However, as the site is close to Carr-bridge and development will impact beneficially on the village as well as the National Park, it is suggested that the Blackmount site should also be specifically cited as a Proposal.

23. It is further suggested that the importance of the A9 as key tourist artery, and of Blackmount as the northern gateway to the National Park warrants specific mention in Section 6. Enjoying and Understanding the Park.

Summary - 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

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 33

Name Mrs Jane Angus

Company

Objector Ref

437r

Representation

Policy 33, 6.5-9, p 56. 6.5-8 I agree that everyone should be welcoming and the policies included, but this will require education in 'responsibility' and map-reading, courtesy in driving, reduction in litter, local buying and quietness in enjoyment if others and wild-life are not disturbed. It might be wise to recognize limits of disturbance before too late.

Summary

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

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 33 **Name** John Anderson **Company** Kincaig & Vicinity Community Council **Objector Ref** 463w

Representation

We support the Alvie Estate view on this Policy.

Summary

Support Alvie estate view on this policy.

CNPA analysis

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

Policy Policy 33 **Name** Susan Davies **Company** Scottish Natural Heritage **Objector Ref** 465u

Representation

In order to deliver National Park Plan Sustainable Tourism Strategic Objective (h), we 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 this Strategic Objective if sites suitable for tourist development were identified on maps of settlements in less-visited parts of the Park.

Summary

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

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 33 **Name** Maurice Stack **Company** Aberdeenshire Council **Objector Ref** 473z

Representation

Would welcome reference to linkages to public transport networks. Something along the lines of ALP Emp\9 would be good, particularly b), and c). Policy 33 Tourism Devt. - Impact of loss of hotels, there is an incentive to run a business down and maintain it badly in the short term to argue it isn't viable and should be closed/turned into flats. Eg. Kincardine O'Neil. Also various enquiries in Braemar for conversion of hotels/B&B's into private homes.

Summary

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

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 33 **Name** Hebe Carus **Company** The Mountaineering Council of Scotland **Objector Ref** 024g

Representation

Policy 33 - "Countryside management, the provision of recreational facilities and the development of core path networks also have a recognised role to play in underpinning rural tourism." Cairngorms National park also attracts large numbers of adventurous visitors that are attracted by the wild character. This sector must also be considered in tourism development, and for whom a burgeoning number of way marking and surfaced paths into wilder area would detract from the experience and reasons for visiting.

Summary

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

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 33	Name Rona Main	Company Scottish Enterprise Grampian	Objector Ref 425a(b)
	Agent Steve Crawford		

Representation

The Local Plan recognises the importance of Tourism, which is welcomed, but we believe this is not fully taken on board in the policies. Indeed, the Plan does not particularly include any real allocations for tourism use. It does not include any specific proposals for tourism development either. It is not unusual for Local Plans to include such proposals that reflect other agencies priority Plans. We feel, therefore, that the Local Plan has more scope to support tourism related development and controlled economic growth in the eastern part of the Park, in particular Royal Deeside and Strathdon.

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.

Glenshee and the Lecht are examples of long-standing tourist and cultural facilities that are falling on hard times and dependent on the weather. The Lecht has tried to diversify their facilities to become a year-round destination. The Local Plan policies should allow for such existing facilities to diversify and expand in order to remain viable.

Summary

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

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 33 442f	Name Simon Blackett	Company Invercauld Estate	Objector Ref
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Representation

We support this policy, but would add that well designed chalets, using local materials and based upon the local vernacular, and which reflect the Plan's wider objective on design, countryside access and sustainability, should be considered compliant Tourism developments.

Summary

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

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 33	Name James and Evelyn Sunley	Company	Objector Ref 056a
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Representation

The following comments only pertain to those parts of the Local Plan which affects the Ballater and Crathie district. The Park should note that I as a member of the Ballater and Crathie Community Council do fully support of the future development outline for Ballater, as proposed by the Prince's Foundation. These proposals have received widespread enthusiasm and support from the local population; I am therefore disappointed that the Park Local Plan does not closely reflect the Prince's Foundation's proposals for the future development of Ballater over the 25/30 year development plan envisaged.

General Comments

We are disappointed that the CNPA have not taken the opportunity in the Local Plan to bring forward policies and proposals for the encouragement and development of industrial and tourist based enterprises to create sustainable full time employment. The Local Plan concentrates more on the methods of producing affordable housing without first proposing methods of encouraging business incentives (i.e. rates relief, tax incentives, etc) to first create the employment that in turn creates the need for the additional housing the Plan proposes. In addition, the Plan makes little comment on the need for sustaining the existing infrastructure as well as necessary new infrastructure such as, schools, shopping, and medical facilities etc to support the needs of the 250 housing units in the five years proposed in the Local Plan. The Park Authority needs to look again at its proposal for a sustainable community. Affordable housing needs are directly linked to the requirement of full time employment in the area.

Summary

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

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 33

Name Glenmore Properties Ltd
Company
Agent Steve Crawford

Glenmore Properties Ltd

Objector Ref

453o

Representation

This policy supports new or enhanced tourism related developments as long as they don't have any adverse impact on the environment or landscape. This is slightly at odds with Policy 1. Policy 1 allows for development that impacts on the environment and landscape where the economic impacts outweigh the environmental impacts. This policy should have a similar balanced approach.

In general, however, any policy that supports new or enhanced tourism development is very much supported. Modifications: Alter policies to reflect comments in summary.

Summary

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

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.

Policy Policy 33	Name The Crown Estate Agent Debbie Mackay	Company The Crown Estate	Objector Ref 419r
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Representation

This policy should be more welcoming towards tourism development as this is an essential part of the economy of this area. Modifications to resolve this objection - The word "significant" should be inserted before "adverse environmental or landscape impacts".

Summary

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

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 33	Name Rona Main Agent Steve Crawford	Company Scottish Enterprise Grampian	Objector Ref 425s
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Representation

Enjoying and Understanding the Park

This section of the plan includes policies that should help develop the Park as a "world class destination". It recognises tourism as one of the key economic drivers within the National Park and that maintaining and promoting a healthy tourism industry is vital to the area and its communities. It also recognises the need to support tourism developments that maintain and enhance the range of visitor attractions and facilities, attract more visitors to the area, encourage them to stay longer, and meet their needs and aspirations. (paragraph 6.4).

Policy 33 - This policy is welcomed, as it supports new or enhanced tourism related developments as long as they don't have any

adverse impact on the environment or landscape. However, this is slightly at odds with Policy 1. Policy 1 allows for development that impacts on the environment and landscape where the economic impacts outweigh the environmental impacts. We believe Policy 33 should have a similar balanced approach to Policy 1. In general, however, any policy that supports new or enhanced tourism development is very much supported.

Summary

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

CNPA analysis

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.

Policy Policy 33

Name Jamie Williamson

Company Alvie and Dalraddy Estate

Objector Ref

439y

Representation

The economy within the Cairngorms National Park is already dangerously over dominated by tourism. 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.

Proposed Modifications –

Proposals for new or enhanced tourism-related facilities /attractions will be favourably considered, where they enhance the range and quality of tourism attractions and facilities on offer, and/or lengthen the tourist season, (delete with) or have a beneficial impact on the local economy and without unreasonable adverse environmental or landscape impacts. Any change of use within or away from the tourism sector should not adversely affect the quality of standards provided, or the selection offered, without adequate justification to the satisfaction of the planning authority.

Supporting justifications for proposals should be based on best practice relating to the European Charter for Sustainable Tourism in Protected Areas, (delete and) or the standards established within the industry through VisitScotland.

All proposals should endeavour to protect the current quality of the environment and amenity enjoyed by local communities, maintain and enhance the quality of the visitors experience and ensure the long-term viability of the local tourism industry. (delete Any proposal which would reduce the tourist facilities of an area will be resisted unless the effect can be compensated for/mitigated)

Summary

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

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 33

Name Robert Maund

Company Scottish Council for National Parks

Objector Ref 434I

Representation

Tourism

In the event this section deals only with the physical planning aspect of recreation provision, despite its title giving the impression of a wide ranging discourse on types and character of acceptable recreational activities and how understanding of their use will be of direct benefit both to visitors and to maintaining the quality of the national park 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 Plan promotes very positively the sustainable approach to providing for access and recreational opportunities, including the ever-present element of economic tourist development. The Section is consistent throughout its six Policies in stating that sustainability is the guiding principle on which planning decisions will be made.

Summary

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

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 33 **Name** Dr A M Jones **Company** Badenoch & Strathspey Conservation Group **Objector Ref** 400h(a)

Representation

6.0 - Concerned at the loose wording of some paragraphs and policies.

6.4 - Object due to inappropriate emphasis in support of the “need” to support tourism developments and the requirement that such development “must also take into account” the impact of the development on the environment.

Summary

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

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 33 **Name** Jenny Smith **Company** **Objector Ref** 417d

Representation

Where it is mandatory that existing tourism businesses are sold on as a business could cause major problems, Business come and goes, and where one business ceases, someone else will come and start something else. With inflating house prices the mortgage or down payment required to take over an existing small business will over-ride the possible income level for the business. House inflation has far exceeded other forms of economic growth, and many businesses will have a ceiling in what is possible economically.

Summary

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

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 33

Name Ian Kirk

Company

Objector Ref

386

Representation

This part of the Deposit Local Plan (Policy 33 and para 7.2) aims to increase the stock of tourism businesses and facilities, by attempting to stop the reversal of such facilities away from the tourism sector. In practice it will more often have the opposite effect. As written, the CNPA Plan may make sense when looking at large attractions and facilities, eg a large hotel with dozens of bedrooms, which is possibly going to be turned into a block of flats for secondary home utilisation.

However, the effect of the proposed powers on small businesses would be (1) to adversely affect the future of many existing operators and (2) to act as a disincentive to those who wish to come into the tourism sector.

1. Most small operators, encouraged by their successes, continue to pump back much of their profits into raising their standards and expanding their businesses. This is undoubtedly a great benefit to the successful aims of the existence of the CNPA. By doing so these individuals have little or no opportunity to amass great financial savings and of course they have no company pension schemes to ultimately fall back on. With the present statement in Policy 33, these individuals will be inhibited from moving on to other projects and will be severely restricted in their ability to release their profits for a well-deserved retirement.

2. The current Policy will also restrict entrepreneurial activity on individuals who are contemplating setting up businesses in the Cairngorm National Park. There are more small businesses in Tourism than large ones. Each small business is usually run by one or two individuals who bring their skills together with much time, effort and money into the area. They will often employ many others directly and indirectly. These are usually locals - rarely do they employ non-locals as they are unlikely to have staff accommodation. They often start with the purchase and/or change of use of their own properties, whether buildings or land. To say to them that they can never reverse their efforts by closing down or changing their businesses, is a major disincentive to their entrepreneurial spirit and will reduce the numbers who will start-up in business. Encouragement of small, innovative and enterprising businesses is an essential and important part of the thriving growth of tourism in the CNP. The current restrictive proposal in this Policy goes against one of the main aims - to encourage "...new or enhanced tourism-related facilities/attractions... (which)...enhance the range and quality of tourism attractions and facilities...."

To continue with this Policy, as written, will have profound effects on small tourism businesses and ultimately the credibility and success of the CNPA.

Modifications to resolve this objection - I would like to see small businesses excluded from it. Small could be being defined perhaps as any business which has operated for at least 5 years and which has an annual average turnover of less than £200,000

Summary

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

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 33,34	Name Colonel F.M.K. Tuck	Company	Objector Ref 011g
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Representation

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

Summary

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

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 complimentary 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.

Policy Policy 33-35	Name Dr A M Jones	Company Badenoch & Strathspey Conservation Group	Objector Ref 400h(b)
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Representation

Policy 34 - Object to "will" be permitted on grounds that this policy appears to bypass the planning process.
 Policy 33, 34 and 35 - Object to "proposals will be favourably considered", "will be permitted", "will be supported" and similar statements used in these policies as this pre-empts the planning process. Object to the absence of reference to impact on natural and cultural heritage in these policies.

Summary

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

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

Policy Policy 33-36	Name Maurice Stack	Company Aberdeenshire Council	Objector Ref	473y
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Representation

Policies 33 to 36 welcomed

Summary

Welcome policies 33 to 36

CNPA analysis

No modification considered necessary as a result of this representation.

Policy Policy 33-36	Name North East Mountain Trust	Company North East Mountain Trust	Objector Ref	443g
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Representation

We support policies 33,34,35 and 36.

Summary

Support policies 33, 34, 35 and 36

CNPA analysis

No modification considered necessary as a result of this representation.

Policy Policy 33-36	Name The Cairngorms Campaign	Company The Cairngorms Campaign	Objector Ref	448g
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Representation

We support policies 33, 34, 35 and 36.

Summary

Support policies 33,34,35,36

CNPA analysis

No modification considered necessary as a result of this representation.

Policy Policy 34 **Name** Robert Maund **Company** Scottish Council for National Parks **Objector Ref** 434m

Representation

Policy 34, on outdoor access, is specific in only allowing development proposals which would result in significant loss of access right if an adequate or improved access solution is also provided. A policy statement to be watched with interest! Para. 6.17 states that the planning authority will work with the relevant local authorities on an open space audit, from which an overall strategy will be developed to guide the future scale and direction of outdoor recreational activities. This is a further space to be watched, this time for adequate implementation.

Summary

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

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.

Policy Policy 34 **Name** Strathspey Railway Co Ltd **Company** Strathspey Railway Co Ltd **Objector Ref** 449
Agent Mr J Partridge

Representation

We will not permit the use of part of our trackbed as a footpath. Please see my letter of 13/04/2007 to the Core Paths Plan Consultation. Modifications: Deletion of the proposal.

Summary

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

CNPA analysis

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. No modification considered necessary as a result of this representation.

Policy Policy 34	Name Ian Francis	Company	RSPB Scotland	Objector Ref	424q
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Representation

Again, there should be some explicit statement here of the imperative need not to cause adverse impacts on the natural heritage, which underpins almost all tourism in the Park. All proposals to increase the levels of outdoor access through infrastructure development should be assessed against this test and also make explicit reference to the need to consider cumulative impacts of outdoor access provision.

Summary

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

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.

Policy Policy 34	Name Mrs Jane Angus	Company	Objector Ref	437s
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Representation

6.10-11 Policy 34 p. 57 Outdoor Access as above, especially water and natural interests. — quality of repairs and weather can make for considerable expense and questions of irresponsibility and costs are not considered.

Summary

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

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.

Policy Policy 34	Name Susan Davies	Company	Scottish Natural Heritage	Objector Ref	465v
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Representation

It would be useful to include an additional element to this policy that promotes provision of paths to important local public spaces and

places as an integral part of new housing developments.

Summary

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

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.

Policy Policy 34 **Name** John Anderson **Company** Kincaig & Vicinity Community Council **Objector Ref** 463x

Representation

We generally support the Alvie Estate view on this Policy.

KVCC comment: Makes reference to ‘... improved alternative access solution can be secured to the satisfaction of the Planning Authority and Access Authority’. Rephrase to read ‘... Planning Authority, Access Authority and owners / occupiers affected by the proposal’.

Summary

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

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.

Policy Policy 34 **Name** James and Evelyn Sunley **Company** **Objector Ref** 056r

Representation

6.10/6.11 (Policy 34) The writer is firmly of the belief that a public road should be created between the Braemar (Linn of Dee) through Glen Feshie to Kingussie so as to join the East and West sides of the Park. This would do a great deal to unify the Park which as you must be aware is somewhat divided, it also would provide better access and encourage tourists to visit both sides of the Cairngorms. Two thirds of the required road already exists and only require upgrading and the provision of some bridges.

Summary

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

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.

Policy Policy 34

Name M T Collings

Company

Objector Ref

395a

Representation

Unmanaged access for humans in wild places is destructive of the basic attraction of the Park. A new path or access is not necessarily desirable per se.

Modifications to overcome this objection - The outcome should commence by committing to the wilderness element of the Park and qualifying new paths or water accesses as not being disruptive to wildlife eg. Ground nesting birds, aquatic mammals and amphibians, rare rocks or the wilderness itself.

Summary

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

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.

Policy Policy 34

Name Jamie Williamson **Company** Alvie and Dalraddy Estate

Objector Ref

439z

Representation

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

Proposed Modifications –

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) (delete 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.

Summary

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

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.

Policy Policy 34,35

Name Dr A Watson

Company

Objector Ref

020n

Representation

Policies 34 & 35. Nothing on new paths, bridges, huts etc for walkers or others. These may be acceptable in some areas, but not where they would reduce the "long walk-in" and unnecessarily mar wildness or wilderness. UDAT recently made a new path forming a circular route from Gleann an t-Slugain to Glen Quoich, on ground that had no former footpath, and Bill Marshall and some others in a group at Braemar want a new footbridge across the river Dee north of Braemar, which would reduce the long walk-in to the eastern Cairngorms.

Summary

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

CNPA analysis

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.

Policy Policy 35

Name Jamie Williamson **Company**

Alvie and Dalraddy Estate

Objector Ref

439zz

Representation

If the Park wishes to further develop tourism there may be a need for additional formal recreation facilities such as mountain bike tracks, golf courses and golf driving ranges. The economic attributes of proposed facilities should be considered in balance with their environmental and cultural impact.

Proposed Modifications -

Proposals for the development of additional formal recreation facilities, diversification of, or extensions to existing recreation related business activities or for the enhancement of existing facilities in terms of quality and design will be supported where:

- a) They demonstrate best practice in terms of sustainable design and where there are no unreasonable adverse environmental impacts on the site or neighbouring areas;
- b) (Delete The total footprint of the affected area remains the same as currently permitted and)

c) They will meet an identified community or visitor need.

Summary

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

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.

Policy Policy 35

Name Rona Main **Company** Scottish Enterprise Grampian
Agent Steve Crawford

Objector Ref

425t

Representation

The generalities of this policy i.e. supporting additional or extended formal recreational facilities, is supported. There is little point attracting more visitors and residents if there are no recreational facilities available to them. SE Grampian is concerned that the policy may contradict itself. Section b) requires that the total footprint remains the same but extensions or additional recreational facilities need more of a footprint to be viable. Part c) of the policy presents requirements that are very difficult to quantify. Demand and supply of such facilities is a complex process and developing new facilities e.g. children's play barns, can create the demand. SE Grampian is concerned that this policy could prohibit or restrict new recreational facilities.

Summary

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

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.

Policy Policy 35	Name Campbell Gerrard	Company	Sportscotland	Objector Ref	380c
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Representation

We find this clause confusing. It is unclear what an 'affected area' is. Does this refer to the area/piece of ground that is to be developed? The remainder of the policy is also difficult to understand. Does clause (5) mean that any extension cannot exceed the footprint of the building that is being extended? And what happens for a stand alone development, there would not be any current footprint to remain the same as.

Modifications needed to resolve this objection – Clarification is required on what is meant by the term 'affected area' and in relation to the application of the policy and how development will relate to the 'currently permitted footprint'.

Summary

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

CNPA analysis

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.

Policy policy 35	Name DW and IM Duncan	Company		Objector Ref	037m
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Representation

There is a requirement for the now demolished Aviemore Ice rink for the benefit of both locals and visitors.

Summary

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

CNPA analysis

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.

Policy Policy 35

Name Maurice Stack **Company** Aberdeenshire Council

Objector Ref

473zi

Representation

Para b) says the footprint of the affected area has to remain the same as currently permitted – why? And is it feasible if the policy is for extensions to existing businesses?

Summary

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

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.

Policy Policy 35

Name Glenmore Properties Ltd

Company Glenmore Properties Ltd

Objector Ref 453p

Agent Steve Crawford

Representation

The generalities of this policy i.e. supporting additional or extended formal recreational facilities, is supported. There is little point attracting more visitors and residents if there are no recreational facilities available to them (not everyone enjoys outdoor recreational activities). The policy, however, contradicts itself. Section 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) of the policy 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. This policy should not stand in the way of new recreational facilities.

Modifications: Alter policies to reflect comments in summary.

Summary

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

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.

Policy Policy 35

Name John Anderson **Company** Kincaig & Vicinity Community Council **Objector Ref** 463y

Representation

We generally support the Alvie Estate view on this Policy.

KVCC comment: b) Makes reference to '... the total footprint of the affected area remains the same as currently permitted' does not allow for greater needs of an expanding community. Again decide on individual merit.

Summary

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

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.

Policy Policy 35

Name Susan Davies

Company Scottish Natural Heritage

Objector Ref

465w

Representation

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

Summary

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

CNPA analysis

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

Policy Policy 35,36

Name Mrs Jane Angus

Company

Objector Ref

437t

Representation

6.11-18 Policy 35-6 p.57-8: Golf courses. football pitches, indoor climbing, heated swimming pools. chilled skating and curling are not

available for all settlements. As most sporting facilities have started either with educational or club funding, will there be support in cash or just meaning well?

Should we try for the Ballater Old Landfill for football or something nearer? The resurfacing of the Deeside Way does not bode well for a tram-line which might have made easier access for young people. Should we consider plastic geodetic domes, as in Netherlands, Germany etc.? The gaps within local provision in some recreational facilities which could be of interest to visitors as well as local young people are in mountain biking, more orienteering, transport to public swimming baths, aerial-ropeways, athletics training and water sports. Experience in early stages of all sports is not helped by the lack of every-term specialized teaching, few resident teachers or the anti-social working hours of many parents and grandparents.

Summary

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

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.

Policy Policy 36	Name Mairi Maciver	Company Communities Scotland	Objector Ref 025v
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Representation

We welcome Policy 36 - Other Space Provision - with the requirement for all strategic sites to make a contribution in space or commuted sum towards the provision of open space within the site or the affected community and the resistance to loss of existing open space provision. We also welcome the proposed open space audit and open space strategy to guide future development of such spaces.

Summary

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

CNPA analysis

No modification considered necessary as a result of this representation.

Policy Policy 36	Name Campbell Gerrard	Company Sportscotland	Objector Ref 380d
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Representation

We object to this policy. We consider that the policy fails to provide adequately for the range of recreational provision it aims to address. The policy provides insufficient protection for playing fields and is contrary to the advice of NPPG11 and the emerging SPP11. In addition the requirement in 36(c) is too vague and provides no timescale for the provision of replacement playing fields. It appears from the

background text that Policy 36 applies to ski centres, golf courses and formal mountain bike trails. We do not consider that clauses (a) (b) and (c) are easily applicable to such facilities. It is not easy, for example to make compensatory provision elsewhere for such facilities. We do not consider such facilities should be referred to as open space. Draft SPP11 defines open space as being within settlements. Ski centres, mountain bike centres and most golf courses will lie outwith settlement boundaries.

Policy 36 states that 'loss of existing provision will be resisted particularly where identified on proposals maps'. No mountain bike or ski centres are identified or have policy designations on the proposals maps. We are concerned therefore that they may receive less protection. In addition we note from the settlement proposals maps that a number of sports pitches and golf courses are not protected by designation as OS1, thereby according them less protection from development within the context of Policy 36. We object to this. SportsScotland also notes that the football ground in Aviemore has been identified as possible site for development of a new school. SportsScotland, as a statutory consultee on the development of playing fields would respond to any proposals for development in line with the advice of NPPG11 and SPP11.

Modifications needed to resolve this objection – we consider three separate policies are needed. One on the protection/provision for sports pitches based on the model policy in draft SPP11. A policy on the protection/provision for other open space as defined in SPP11, and a policy protecting other sports facilities and opportunities outwith settlement boundaries. This latter policy may be adequately covered by a general policy which refers 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. Wording to this effect is likely to appear in the finalised SPP11. 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. We would be happy to discuss with you the detailed content of such policies. Please note SPP11 is currently with Ministers awaiting their approval. We would be happy to discuss all our objections and comments on the Local Plan to see if our concerns can be resolved prior to any PLI.

Summary

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 SportsScotland 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

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.

Policy Policy 36	Name Jamie Williamson	Company	Alvie and Dalraddy Estate	Objector Ref	439zzz
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Representation

The policy as stated is too prescriptive. Too many regulations, restrictions and taxes and development will not happen or go elsewhere.

Proposed Modifications -

Proposals to improve or add to current levels of public and amenity open space within the Cairngorms National Park will be supported. Development proposals which include specific details on improving current provision to develop open space networks will be encouraged. (delete all strategic sites identified within the Local Plan proposals map will be required to make a contribution in space or commuted sum towards the provision of open space within the site or the affected community).

Proposals that would result in a loss of existing provision will be resisted, particularly where the affected site has been identified within the Local Plan proposals maps. The loss of such open space will (delete only) be supported where:

- a) It can be demonstrated that no alternative is available; (delete and or)
- b) Compensatory provision is made elsewhere within the community area of at least equal size and quality, or
- c) A commuted sum is made to future provision of such open space

Summary

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

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.

Policy Policy 36

Name John Anderson

Company Kincaig & Vicinity Community Council **Objector Ref** 463z

Representation

We generally support the Alvie Estate view on this Policy. KVCC comment: Makes reference to 'All strategic sites identified with the LP proposal maps will be required to make a contribution in space or commuted sum towards the provision of open space ...' No guidance is given as to how much a commuted sum might amount to.

Summary

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

CNPA analysis

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

Policy Policy 36

Name Reidhaven Estate

Company Reidhaven Estate **Objector Ref** 456j

Agent Jill Paterson

Representation

Reidhaven Estates have concerns about the formulation of this policy and would therefore make representation along the following lines.

- 1) Public and amenity open space are not defined in the glossary. There should be an expectation that 'public and amenity open space' is at least maintained as such by someone - quite likely the local authority.
- 2) There are no specific standards set down within the policy - or any commitment that such standards be established as clear guidance in the near future, for instance as SPG.
- 3) The policy restriction concerning 'loss of existing provision' is very poorly worded in so far as 'existing provision' is both nondescript and subjective. Nowhere in the plan is there advice or guidance which could help one determine whether any given parcel of land was 'existing provision' or not.

4) The policy does not adequately cover the issue of maintenance in any respect at all. Within developments it should be clear that where open space provision is to be secured, that the CNP or relevant Local Authority will continue to maintain such open space.

Modifications:

- 1) A clear definition of 'public and amenity open space' should be provided at the very least within the glossary. Clear differentiation should be included with respect to land where access rights under the LRA(S) apply. There should be an expectation that existing 'public and amenity open space' is already maintained as such by a known authority.
- 2) A commitment to providing design standards for new 'public and amenity open space' should be included,
- 3) The policy should cover the maintenance of 'public and amenity open space' as well as protection and provision.

Summary

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. The policy should be reworded to provide the necessary definitions and clarity.

CNPA analysis

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.

Policy Policy 36

Name Susan Davies **Company**

Scottish Natural Heritage

Objector Ref

465x

Representation

It is not clear 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.

Summary

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

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

Policy Policy 36

Name Colonel F.M.K. Tuck

Company

Objector Ref

011h

Representation

Para 6.16 - why specifically "year round" activities? The nature of the area means that there need to be separate winter and summer activities provided e.g. skiing and canoeing.

Summary

Why specify year round activities? The nature of the area means that there need to be separate winter and summer activities provided e.g. skiing and canoeing.

CNPA analysis

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 throughout the year.