

Objector **Name** Jamie Williamson **Agent**
439w Alvie and Dalraddy Estate
 Alvie Estate Office
 Kincaig, Kingussie
 PH21 INE

Company Alvie and Dalraddy Estate

Policy/site Policy 25

Representation to Deposit Plan

If the Park Authority wants more houses they cannot afford to be too prescriptive. Locating new buildings where old buildings were located previously could help retain some of the built cultural heritage of the area, particularly where the form, scale and materials are the same as before even though the use of the building might be different.

Proposed Modifications –

The replacement of an existing house with a new house will be permitted where:

- a) The existing house is not a listed building;
- b) If the existing house is a traditional vernacular design, it is demonstrated to be (delete Structurally incapable of) unsuitable for rehabilitation and cannot be retained;
- c) The existing house remains largely intact (delete with external walls and roof) or it has been permanently occupied within the previous (delete five) fifteen years;
- d) (delete The proposal is for no more than the existing number of house units; and)
- e) The new house is located on the site of the existing house unless an alternative adjacent site would minimise any negative environmental, social or economic effects of development. If an adjacent site is permitted, the planning authority will normally condition the demolition of the existing house prior to occupation of the new house.

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it does deliver the aim of the policy, and is not overly restrictive or onerous, but also provides an appropriate level of guidance for developers and people using the policy. The proposed wording will be assessed in this regard.

Response to 1st modifications

The replacement of an existing house with a new house will be permitted where:

- a) the existing house is demonstrated to be structurally unsound or incapable of rehabilitation, or uneconomic to maintain as a dwelling relative to a new replacement, or considered inappropriate in its surroundings (and has been occupied at some stage in the previous ten years;) and
- b) The new house is located on the site of the existing house unless an alternative adjacent site would minimise any negative environmental, social or economic effects of development; and
- c) the existing house is not a listed building.

If an adjacent site is permitted, the planning authority will normally condition the demolition of the existing house prior to occupation of the new house, unless the redundant building is to be used as part of the redevelopment scheme, or holds significant cultural heritage merit. (The proposal should not increase the number of dwellings on the site.) Where practical it is desirable for the (The) replacement house (must also) to reflect the siting and scale of the original (and should salvage materials from the original to incorporate into the new development.)

If the Park Authority wants more houses they cannot afford to be too prescriptive. The overall perception is that this plan is unreasonably and unnecessarily restricting further houses which will increase the value of houses which in turn will persuade or force those wanting to develop new houses to pay the taxes, section 75 agreements and other contributions to fund the bureaucracy of the National Park Authority and its infrastructure. This must be to the detriment of the local communities and businesses within the National Park.

Locating new buildings where old buildings were located previously could help retain some of the built cultural heritage of the area, particularly where the form, scale and materials are the same as before even though the use of the building might be different.

Many existing houses in the countryside were built to minimum standards to house estate, farm or forestry staff over 50 years ago and no longer meet current needs or aspirations. They can be expensive to maintain and heat. There could be massive savings to be made (as well as carbon reductions) by replacing such houses with fully insulated modern houses with low energy requirements.

CNPA analysis of response to 1st modifications

The issue of occupancy in previous years was debated by the Board at the time of modifications. It is considered that the terms of a ten year occupancy may be too rigid, and the options to amend this to a wider 25 years should be considered as a future modification.

response to 2nd modifications

WRITTEN

Objector Name Glenmore Properties Ltd
453n Viewfield Farm
Craigellachie
Aberlour
AB38 9QT

Agent Steve Crawford
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB

Company Glenmore Properties Ltd

Policy/site Policy 25

Representation to Deposit Plan

We support the principles of this policy but request that it allows the replacement of a single house with more than one house where the site allows such development. This could be on large sites where new development fits the landscape well or to replace larger than average houses.

The Moray Local Plan operates a 4-stage recognition policy where replacement housing is considered acceptable. This ranges from actual evidence of a previous house i.e. evidence of all four walls although not fully intact to the house effectively still standing. We suggest that the CNPA adopt a similar policy. The National Park grew up over the years with housing scattered about the countryside. This is a key feature but many of these houses have been abandoned. We don't believe that the retention of derelict dwellings is desirable feature of the Park and where the location is acceptable then replacement of such dwellings could be appropriate. There should be no occupancy requirement in these cases.

Modifications: Alter policies to reflect comments in summary.

CNPA analysis of objection to Deposit Plan

The comment is noted. In regard to the mention of derelict properties and occupancy conditions, any proposal would be measured against the terms of this policy. The wording will however be reviewed to ensure that it does deliver the aim of the policy, and is not overly restrictive or onerous, but also provides an appropriate level of guidance for developers and people using the policy.

Response to 1st modifications

We support the principles of this policy but request that it allows the replacement of a single house with more than one house where the site allows such development. This could be on large sites where new development fits the landscape well or to replace larger than average houses.

The modified policy requires that evidence is required to demonstrate that the house has been occupied at some stage in the previous 10 years. This will prove difficult to demonstrate on many sites – it should be sufficient that evidence of residential use of the building at some stage (such as existence of fireplaces and chimneys) is present.

The Moray Local Plan operates a 4-stage recognition policy where replacement housing is considered acceptable. This ranges from actual evidence of a previous house i.e. evidence of all four walls although not fully intact to the house effectively still standing. We suggest that the CNPA adopt a similar policy. The National Park grew up over the years with housing scattered about the countryside. This is a key feature but many of these houses have been abandoned. We don't believe that the retention of derelict dwellings is desirable feature of the Park and where the location is acceptable then replacement of such dwellings could be appropriate.

CNPA analysis of response to 1st modifications

The issue of occupancy in previous years was debated by the Board at the time of modifications. It is considered that the terms of a ten year occupancy may be too rigid, and the options to amend this to a wider 25 years should be considered as a future modification.

Regarding the salvaging of materials the second amendments will add 'where appropriate'.

response to 2nd modifications

In respect of our previous correspondence we would wish to maintain our objections as previously detailed to
Policy 25

HEARING

Objector	Name	Agent
020q	Dr A Watson Clachnaben Crathes, Banchory Kincardineshire AB31 5JE	

Company

Policy/site Policy 25

Representation to Deposit Plan

Policy 28, e), should there not be a limit on the expansion extent compared with the original house? e.g. Kincardine & Deeside used to say up to 50% more. Should be some limit.

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it does deliver the aim of the policy, and is not overly restrictive or onerous, but also provides an appropriate level of guidance for developers and people using the policy. However issue of the appropriate scale of extensions would be considered in light of the proposed development and the impact on the building, a prescriptive % is therefore not supported.

Response to 1st modifications

Objection maintained.

CNPA analysis of response to 1st modifications

Policy 25 has been largely altered to give additional clarity and to alter the options regarding development opportunity for replacement houses. No further modification proposed.

response to 2nd modifications

Thank you for your letter of 5 November. I am content for the written representations that I made earlier to be used for the public inquiry.

WRITTEN

Objector **Name** Frogmore Estates Scotland Ltd
026e

Agent Philip Clarke
Barton Willmore
12 Alva Street
Edinburgh
EH2 4QG

Company Frogmore Estates Scotland Ltd

Policy/site Policy 25

Representation to Deposit Plan

Replacement Houses (Page 51), provides scope for such development where, the existing house is relatively intact with external walls and roof, or has been occupied in the past 5 years.

The re-use of existing permanent structures which were previously dwellings, of which there are many throughout the Park, offers the most sustainable means of providing housing outwith settlements, without compromising the landscape qualities of the Park through the introduction of new structures. At present, the combined provisions of Policy 26 and Policy 28 are not in keeping with SPP15 and require adjustment accordingly.

Objection is made, therefore, to the wording of Policy 26 - Housing Proposals Outwith Settlements and it is recommended that this be modified by the inclusion of an additional point after e) stating:

“or; f) The proposed dwelling is sited on previously developed land and does not result in any adverse impact upon the special qualities of the Park.”

Objection is also made to the wording of Policy 28 - Replacement Houses which should be amended to remove point c), which requires that the original building must either be intact with external walls and roof or must have been occupied over the previous five years.

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it does deliver the aim of the policy, and is not overly restrictive or onerous, but also provides an appropriate level of guidance for developers and people using the policy.

Response to 1st modifications

Maintain objection. Subject to the first modifications Policy 25 Replacement Houses (page 48) would provide scope for replacement of an existing house where it is structurally unsound, is not listed, has been occupied in the past 10 years and, normally, where the new house would be on the same site as the existing one.

As previously discussed the re-use of existing permanent structures which were dwellings offers the most sustainable means of providing housing outwith settlements, without compromising the landscape qualities of the Park through the introduction of new buildings in new locations.

It is submitted that the wording set out in the proposed modification to Policy 25 Replacement Houses which requires that the existing house should have been occupied at some state in the previous ten years in unduly restrictive and would also be contrary to, and therefore stifle the aims of SPP15.

Particularly with the rise in house prices since 1997/1998 it is unlikely that many houses if any at all will be have been abandoned within the past ten years. The majority of ruinous buildings which can be seen across the National Park will have been abandoned for long periods of time and would not meet the criterion proposed for introduction to Policy 25. However this has no bearing upon the worthiness or appropriateness of dwellings rehabilitation or replacement.

By proposing to introduce the requirement that a dwelling must have been occupied at some point over the past ten years, the Park Authority would unreasonably restrict the effectiveness of the Policy and fail to meet the objectives of SPP15 Rural Development, which seeks to encourage such development with a view to stimulating the rural economy.

CNPA analysis of response to 1st modifications

The issue of occupancy in previous years was debated by the Board at the time of modifications. It is considered that the terms of a ten year occupancy may be too rigid, and the options to amend this to a wider 25 years should be considered as a future modification.

response to 2nd modifications

With reference to your letter of 5th November 2008 we write to confirm that we wish to maintain our unresolved objections to the Cairngorms National Park Local Plan. The forms which accompanied our representations to the first modifications indicate that we sought to have those objections considered via written submissions. Notwithstanding, the forms which were submitted with our original objections to the Deposit Local Plan indicated our intention to have our objections considered by formal inquiry. We therefore, at this stage intend that our unresolved objections to the Deposit Local Plan be considered by formal inquiry, but reserve the right to change consideration to written submissions at a later date, should we or our client consider it appropriate.

We can confirm that we have no further comments on the most recent modifications to the Plan which were issued in November 2008. We trust that you find this acceptable, however should you wish to discuss the matter further then please do not hesitate to contact either Philip Clarke or the undersigned (Gordon Thomson).

INQUIRY

Objector **Name** Reidhaven Estate
456i Seafield Estate Office
 Cullen
 Buckie
 Banffshire

Agent Jill Paterson
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB

Company Reidhaven Estate

Policy/site Policy 25

Representation to Deposit Plan

It is our view that this policy is over restrictive, particularly in relation to part (c) as this effectively precludes the redevelopment of semi-derelict sites. A key characteristic of the National Park is the housing that has been built over the years throughout the countryside, including many traditional properties. Many of these houses have however been abandoned and often the roof is the first element to fall into disrepair. The retention of these derelict buildings, we believe, is not a desirable feature of the Park and therefore the replacement of such dwellings could be appropriate. There should be no occupancy requirement in these cases.

Modifications:

Amend part (c) of the policy to remove the reference to roof.

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it does deliver the aim of the policy, and is not overly restrictive or onerous, but also provides an appropriate level of guidance for developers and people using the policy. The proposed wording will be assessed in this regard.

Response to 1st modifications

Objection maintained. We have some concern about the reference to occupied in the last ten years. This is difficult to determine and would preclude the redevelopment of semi-derelict sites many of which do not contribute to the landscape setting of the Park and would benefit from redevelopment. A more appropriate approach would be to show physical evidence of a property. The level of evidence required could be outlined in the policy or guidance. In addition there are likely to be some circumstances where the salvaging of materials is not possible, therefore the policy should allow for this exception.

Amend last sentence to: 'the replacement house must also reflect the siting and scale of the original and should salvage materials from the original or incorporate into the new development, where possible'.

Remove reference to evidence to occupation at some stage in the previous ten years and reword to include reference to physical evidence of a property.

CNPA analysis of response to 1st modifications

The issue of occupancy in previous years was debated by the Board at the time of modifications. It is considered that the terms of a ten year occupancy may be too rigid, and the options to amend this to a wider 25 years should be considered as a future modification.

Regarding the salvaging of materials the second amendments will add 'where appropriate'.

response to 2nd modifications

HEARING

Objector 425k	Name Rona Main Scottish Enterprise Grampian 27 Albyn Place Aberdeen AB10 IDB	Agent Steve Crawford Halliday Fraser Munro 8 Victoria Street Aberdeen AB10 IXB
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Company Scottish Enterprise Grampian

Policy/site Policy 27

Representation to Deposit Plan

This is the key policy for new and existing economic development. It sets down when development proposals are acceptable within settlement boundaries and out-with the same boundaries. Paragraph 5.12 (on Economic Development), however, reduces the economic development strategy to one that maintains the current population and provides for “the employment needs and aspirations of local communities”. We would raise the question of whether this goes far enough. For example, we do not believe it is acceptable to promote the status quo in a Park that needs significant investment in its tourist infrastructure. The economic development policies, therefore, appear to start from a strategy of no or low growth.

a) within settlement boundaries - is clear-cut and should be supported.

b) out-with settlement boundaries is generally acceptable but refers, for example, to “demonstrable locational requirement” and then applies a sequential type approach with settlements being considered as the first area of search. Although this is generally welcomed in that it supports outdoor based tourism and recreational businesses, it does not provide further guidance on how the need is to be demonstrated, and the sequential approach creates a level of analysis that some outdoor based tourism or recreational businesses need not be party to e.g. mountain biking centres where it is obvious that they need to be located close to the cross country trails.

c) development to support a rural business and diversification of that business is supported. The balance between the National Park’s economic aims and the natural and cultural heritage aims, however, is not clear in the policy. This policy should reflect the fourth aim of the National Park and help support the economy of rural communities as well as settlement-based communities.

CNPA analysis of objection to Deposit Plan

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

Response to 1st modifications

We welcome the modifications under Sections 5.77 – 5.79 and Policy 27 Business Development. We are particularly enthused by the modification under Policy 27 section c) which states ‘...supports the...viability of ... businesses in rural locations..... or creates new small scale development which supports the local economy ‘.

The CNP may be aware that Scottish Enterprise believe the general poor standard of visitor accommodation and lack of choice of accommodation mix is an impediment to the economic growth of the CNP area and Scotland’s Tourism sector. We wish to promote the development of a sustainable small scale resort in the Cairngorms that meets with global standards and the expectations of the CNP visitors, which respects the natural environment and landscape. We acknowledge the development of such a concept would require further detailed discussions with the CNP and collaborative working with you, and we welcome the modifications under Policy 27 which would appear to support this, subject to it meeting other policies. We would support the strengthening of this policy to reflect support for the creation of high quality/world class visitor accommodation.

CNPA analysis of response to 1st modifications

The support for this policy is noted. The creation of the highest quality development to support the Park is established clearly in the Vision for the Park stated in both the Park Plan and Local Plan. No further modifications are therefore proposed.

response to 2nd modifications

HEARING

Objector	Name	Agent
056k	James and Evelyn Sunley 12 Lochnagar Way Ballater AB35 5PB	

Company

Policy/site Policy 27

Representation to Deposit Plan

5.12/5.20 The need for sustainable business development is a prime concern. The needs of Ballater are far different from those of Aviemore and Badenoch where commercial development is vibrant. Commercial development in Ballater is, on the other hand stagnating and we urgently need incentives for new business to come to Ballater. A prime example is perhaps the cost of renting industrial units from the Local Authority. We therefore hope that the Local Plan will highlight the need for Government agencies to help encourage new business to Ballater in the form of rates relief and tax breaks which are available in other areas in the country.

CNPA analysis of objection to Deposit Plan

The comments are noted, and whilst interesting are not linked to land use planning and so are not appropriate for inclusion within the Local Plan. The CNPA will however continue to work with partners to bring this issue to the attention of those involved to ensure the best approach is taken for businesses in the Park area.

Response to 1st modifications

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

CNPA analysis of response to 1st modifications

The requirements for affordable housing have been reduced. The plan also identifies land for employment, and recognises the retail centres of particular settlements, including ballater. No further amendment is therefore proposed.

response to 2nd modifications

Thank you for your letter dated 5th Nov. 2008 with regard to the arrangements for the Local Plan inquiry and the further modifications to the Local Plan. I refer you to the changes indicated in appendix page 8 of your letter and point out that "page 68 , Ballater ..."is in fact page 72, page 68 refers to Kingussie. I further point out that the change to 16.2ha from the original 10.99ha, is a change due to the inclusion by CNPA of areas E2, and E3 areas which did not form part of development land on the Aberdeenshire CC Local Plan. This change should be properly delineated as a change from the ACC Local Plan.

With regard to my intentions with regard to the Reporters enquiry, it is decide on this matter but will probably follow the informal route.

HEARING

Objector **Name** The Crown Estate
419i

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

Company The Crown Estate

Policy/site Policy 27

Representation to Deposit Plan

This policy is unduly restrictive in that it could restrict farms seeking to diversify outwith settlements. The policy gives an unnecessarily negative impression as regards rural development in the Park Area. There should be much more explicit support for rural development expressed in this policy in order to engender a spirit of enterprise in the park area. Rural enterprise should not be unreasonably constrained or deterred by the use of conditions or legal agreements as per the last sentence of the policy.

Modifications to resolve this objection -

The policy should express a much more explicit statement of support for rural enterprises. The statement “where the proposal will be subject to conditions or legal agreements to secure the appropriate long-term management of the business.” should be removed.

CNPA analysis of objection to Deposit Plan

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

Response to 1st modifications

Objection maintained.

CNPA analysis of response to 1st modifications

The policy has been much altered and has added opportunities for development, and is worded in a more positive way. No additional modifications are therefore proposed.

response to 2nd modifications

WRITTEN

Objector	Name	Agent
399k	Nicola Abrams SEPA Leading Light Building 142 Sinclair Road Aberdeen, AB11 9PR	

Company SEPA

Policy/site Policy 27

Representation to Deposit Plan

SEPA objects to the wording of the policy which does not make clear reference to waste management.

Reason for Objection - The Policy would exclude waste management proposals, as waste management does not fall within these use classes, being a “sui generis’ land use. National Planning Policy (SPP10 and PAN 63 and the National Planning Framework) all refer to the fact that waste management uses are appropriate on industrial land with SPP10 recommending a model policy (paragraph 26) promoting waste management uses on the planned supply of employment and industrial land.

Suggested Modification - SEPA recommends Policy 20 is cross referenced with the waste management policy by making it explicit that waste management uses (subject to environmental and amenity considerations) are appropriate on business land and could therefore be covered by this policy. For example “...business development (which includes waste management)”

CNPA analysis of objection to Deposit Plan

The comment is noted. This issue of waste is considered specifically in policy 32 and 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.

Response to 1st modifications

SEPA maintains its objection to the wording of the policy which does not make clear reference to waste management. The policy would exclude waste management proposals as waste management does not fall within these use classes, being a ‘sui generis’ land use. national Planning Policy (SPP10 and PAN63 and the National Planning Framework) all refer to the fact that waste management uses are appropriate on industrial and with SPP10 recommending a model policy (Para 26) promoting waste management uses on a planned supply of employment and industrial land.

Suggested modification - SEPA recommends that Policy 27 is cross referenced with the waste management policy by making it explicit that waste management uses (subject to environmental and amenity considerations) are appropriate on business land and could therefore be covered by this policy. For example 'business development (which includes waste management)'

CNPA analysis of response to 1st modifications

The implementation of the plan relies on all relevant policies being read together rather than using cross referencing. This approach has not changed. No modification is therefore proposed.

response to 2nd modifications

Maintain objection.

WRITTEN

Objector **Name** The Proprietors of Mar Centre
394n

Agent Steve Crawford
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB

Company The Proprietors of Mar Centre

Policy/site Policy 27

Representation to Deposit Plan

CNPA analysis of objection to Deposit Plan

Response to 1st modifications

Our Client generally supports this policy but suggests that the relocation of business uses should not be considered contrary to it.

Changes Required to Resolve the Objection

A further sentence should be added to the policy or implementation that indicates relocation within the Park would not be considered the loss of a business use. The policy should also allow for the redevelopment of business land for other uses where that business is no longer viable and alternative and more marketable business land is available that meets local demand.

CNPA analysis of response to 1st modifications

The policy does not preclude against relocation. Where an application is for relocation this would be considered on the merits of the loss caused at the existing site and the creation of new opportunities in the new site. No further modifications are proposed.

response to 2nd modifications

Some minor changes have been made to this policy. Some of these meet the original objection lodged by Halliday Fraser Munro on behalf of Mar Estate, but the policy remains too restrictive. We therefore maintain the objection for discussion with the Park.

HEARING

Objector **Name** James Gibbs **Agent**
421h HIE Inverness and East Highland
 The Green House
 Beechwood Business Park North
 Inverness, IV2 3BL

Company HIE Inverness and East Highland

Policy/site Policy 27

Representation to Deposit Plan

Boat of Garten, Cromdale, Dalwhinnie, Dulnain Bridge, Kincaig, Nethy Bridge -

Whilst the plan's policy 20 (pp. 38) may permit some change of use and business development in these communities we believe more specifically designated space, on an appropriate scale would encourage more local working and further strengthen the economies of these communities.

CNPA analysis of objection to Deposit Plan

The comments are noted, and the approach taken to the allocation of land for business development in settlements will be reviewed to ensure an appropriate level of guidance is given to potential developers, and the community supported.

Response to 1st modifications

CNPA analysis of response to 1st modifications

response to 2nd modifications

WRITTEN

Objector	Name	Agent
453h	Glenmore Properties Ltd Viewfield Farm Craigellachie Aberlour AB38 9QT	Steve Crawford Halliday Fraser Munro 8 Victoria Street Aberdeen AB10 1XB

Company Glenmore Properties Ltd

Policy/site Policy 27

Representation to Deposit Plan

Paragraph 5.12 (on Economic Development) reduces the economic development strategy to one that maintains the current population and provides for “the employment needs and aspirations of local communities”. The question is whether this goes far enough. Is it acceptable to promote the status quo in a Park that needs significant investment in its tourist infrastructure. We don’t believe that it is. The economic development policies, therefore, start from a strategy of no or low growth.

Part b) out with settlement boundaries is generally acceptable but refers, for example, to “demonstrable locational requirement” and then applies a sequential type approach with settlements being considered as the first area of search. Although this is generally welcomed in that it supports outdoor based tourism and recreational businesses, it does not provide further guidance on how the need is to demonstrated and the sequential approach creates an level of analysis that some outdoor based tourism or recreational businesses need not be party to.

Part c) development to support a rural business and diversification of that business is supported. The balance between the National Park’s economic aims and the natural and cultural heritage aims, however, does not come through in the policy. This policy should reflect the fourth aim of the National Park and help support the economy (and associated growth) of rural communities as well as settlement-based communities.

Modifications: Policy wording altered to reflect issues raised in summary.

CNPA analysis of objection to Deposit Plan

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

Response to 1st modifications

This is the key policy for new and existing economic development. It sets down when development proposals are acceptable within settlement boundaries and outwith the same boundaries.

In the main, the changes suggested through the proposed modifications are to be welcomed. We do have concerns regarding the final part of the policy –that 'Development proposal which would result in a loss of business use on the proposal site will be resisted.' We understand the sentiment behind this, but the wording should be amended to include 'unless it can be demonstrated that no demand exists for the site in business use.'

CNPA analysis of response to 1st modifications

Para 5.86 clarifies the need for applicants to demonstrate the need for the development, The final para of the policy will also be amended in line with the suggested wording.

response to 2nd modifications

In respect of the proposed 2nd modifications our concerns regarding the following policy has been addressed:

Policy 27 Business Development.

We are therefore indicating a willingness to withdraw our clients objection to Policy 27 but wish to maintain our position at present and therefore will be sustaining this representation with a view to withdrawing this at a later date if the revised policy does not alter.

HEARING

Objector	Name	Agent
400g(b)	Dr A M Jones Badenoch and Strathspey Fiodhag Nethybridge PH25 3DJ	

Company Badenoch and Strathspey Conservation Group

Policy/site Policy 27

Representation to Deposit Plan

Para 5.12 - Object to reference to “To maintain current population levels” on grounds that it implies there is a problem of a declining population. Within B&S this is not justifiable. In addition, many would argue that an overall decline in a country’s population, and a decline in world population, is positive rather than negative. The DLP should not be including sweeping comments with far-reaching implications without providing data to back it up and scope for a proper assessment of the validity of the arguments.

Policy 20 - Object to “ will be favourably considered” in a and b, and “will be approved” in c on grounds of being inappropriate and pre-empting the planning process. Suggest alter to “may”.

CNPA analysis of objection to Deposit Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities, allocation of land for services to support this including creating the appropriate level of opportunities for employment growth, and the protection of the special qualities of the area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use. As a result of this consultation process further work will be undertaken to link more closely the demand for housing to economic prosperity and the need to work within the aims of the Park. This will be linked to the work ongoing relating to sustainability. Confirm proposals must meet all relevant policies as set out in introduction/context section. The wording does not therefore imply permission will be granted. Also confirm that it is clear that without economic opportunities the aim of the national park plan to support sustainable communities will not be possible.

Response to 1st modifications

Object to lack of reference to impact on landscape and the special qualities of the NP (see e.g. 6.17).

CNPA analysis of response to 1st modifications

The policies of the plan are to be read together and as such policy 7 regarding landscape would also apply to any proposal being considered under policy 27. No modification is therefore proposed.

response to 2nd modifications

Maintain objection Object to lack of reference to impact on landscape and the special qualities of the NP (see e.g. 6.17).

HEARING

Objector 437n	Name Mrs Jane Angus Darroch Den Hawthorn Place Ballater AB35 5QH	Agent
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Company

Policy/site Policy 27

Representation to Deposit Plan

Policies 20- 1 p 38-9 I agree that work-spaces in the country-side and centres are important but would point-out that transport constraints call for improvements and retention of Post Offices and Royal Mail vehicles for delivery and transport.

CNPA analysis of objection to Deposit Plan

The comments are noted. However this is not something that can be addressed through a local plan policy. No modification considered necessary as a result of this representation.

Response to 1st modifications

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

CNPA analysis of response to 1st modifications

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

response to 2nd modifications

WRITTEN

Objector **Name** Jamie Williamson **Agent**
439o Alvie and Dalraddy Estate
 Alvie Estate Office
 Kincaig, Kingussie
 PH21 INE

Company Alvie and Dalraddy Estate

Policy/site Policy 27

Representation to Deposit Plan

Many rural communities need to diversify their economic activities in order to survive and prosper. The Cairngorms National Park Authority should be encouraging rural communities to seek out new sources of income generation instead of discriminating against development and economic activities in the countryside.

Proposed Modification –

a) Within existing settlement boundaries, new proposals for business development will be favourably considered, particularly where this consolidates existing business centres or estates. Any proposal which undermines the economic viability of that centre will be resisted unless there is a demonstrable social or community need for the proposal. The potential cumulative impact of similar proposals will be taken into account

b) Outwith settlement boundaries, proposals for business and economic development will be favourably considered where the proposal is likely to benefit the local rural economy (delete for home based working or workshops which form an integral part of an existing development, or where there is a demonstrable locational requirement, where no suitable sites are available within settlements and where the proposal is supported by a detailed business plan.) There should be a presumption in favour of (delete Where possible) proposals (delete should be) that are located adjacent to existing buildings and (delete should have) having no adverse impact on existing business centres or any neighbouring land use. The potential cumulative impact of similar proposals will be taken into account

c) Proposals for development which support the viability of a rural business or promote diversification within that business will be approved where the proposal has no significant adverse impact on the natural and cultural heritage of the National Park or its landscape. (delete where the proposal) Proposals will be favoured where they are (delete is) complementary to the current rural business activity within the site. (delete and where the proposal will be subject to conditions or legal agreements to secure the appropriate long term management of the business).

CNPA analysis of objection to Deposit Plan

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

Response to 1st modifications

Development proposals which support economic Development:

a) in identified settlements - (is located within existing settlement boundary and) supports the economic vitality and viability of that (centre) community. Exceptions to this should ... account.

b) outwith settlements - (is in an existing business park or industrial estate, or where it can be demonstrated that there are no more sequentially appropriate sites

available.) Developments should have no adverse impact on the existing vitality or viability of the settlement, (or neighbouring existing business parks or industrial estates.)

c) other business opportunities - supports the vitality and viability of ...economy.

Development proposals ... resisted.

Many rural communities need to diversify their economic activities in order to survive and prosper. The Cairngorms National Park Authority should be encouraging rural communities to seek out new sources of income generation instead of discriminating against development and economic activities in the countryside.

CNPA analysis of response to 1st modifications

The economic development policy has been redrafted to ensure that appropriate opportunities are created and the notion of a sequential approach to finding a site for such development is in line with government guidance. No modification is therefore proposed.

response to 2nd modifications

WRITTEN

Objector **Name** John Forbes-Leith Esq
418i Dunachton Estate

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

Company Dunachton Estate

Policy/site Policy 27

Representation to Deposit Plan

This policy is unduly restrictive in that it could restrict farms seeking to diversify outwith settlements. The policy gives an unnecessarily negative impression as regards rural development in the Park Area. There should be much more explicit support for rural development expressed in this policy in order to engender a spirit of enterprise in the park area. Rural enterprise should not be unreasonably constrained or deterred by the use of conditions or legal agreements as per the last sentence of the policy.

Modifications to resolve this objection -

The policy should express a much more explicit statement of support for rural enterprises. The statement “where the proposal will be subject to conditions or legal agreements to secure the appropriate long-term management of the business.” should be removed

CNPA analysis of objection to Deposit Plan

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

Response to 1st modifications

Objection maintained.

CNPA analysis of response to 1st modifications

The policy has been much altered and has added opportunities for development, and is worded in a more positive way. No additional modifications are therefore proposed.

response to 2nd modifications

WRITTEN

Objector 425a(c)	Name Rona Main Scottish Enterprise Grampian 27 Albyn Place Aberdeen AB10 IDB	Agent Steve Crawford Halliday Fraser Munro 8 Victoria Street Aberdeen AB10 IXB
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Company Scottish Enterprise Grampian

Policy/site Policy 27

Representation to Deposit Plan

Although the Local Plan is a step in the right direction in respect of Economic Development we do not believe that it has the right balance between economic development and the natural and cultural assets. There does not seem to be a dedicated economic development strategy within the Local Plan itself and, as a consequence, any strategy 'falls out' of housing land and business land designations. This policy has a low allocation of housing on the eastern side of the Park, does not meet the aims and objectives of SE Grampian and we believe is unlikely to achieve the optimum balance between economic viability and maintenance of the Park's key natural assets.

Of concern is that the Local Plan is significantly short of employment land allocations. This is especially the case in Ballater and Braemar but even settlements such as Dinnit as a gateway location, and the Strathdon settlements could assist in the development of tourism supporting services to the Park.

At a practical level, many of the existing businesses in the Park are in established premises. Their best option for remaining viable could be to extend and improve their existing premises. The Plan should allow for this option to be practically realistic without undue policy restrictions.

CNPA analysis of objection to Deposit Plan

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

Response to 1st modifications

Objection maintained.

CNPA analysis of response to 1st modifications

Additional focus has been placed on economic development and growth and land has been identified within the proposals maps for economic development. No further modifications are therefore proposed.

response to 2nd modifications

HEARING

Objector **Name** Cooperative Group
370b Property Division

Agent Lorraine Jones
GL Hearn
241 St Vincent Street
Glasgow G2 5QY

Company Cooperative Group

Policy/site Policy 28

Representation to Deposit Plan

While it is not appropriate to designate centres in the smaller settlements, nonetheless local shops serving the immediate and surrounding community are important facilities in these villages. In order to recognise this we would suggest a policy be included to the effect that small local shops in such centres, say of no more than 200sqm gross floorspace and designed and intended to serve only the local catchment, are exempt from the sequential requirement.

Suggested Modifications: It is suggested that policy be included to the allow small scale retail development, say of no more than 200sqm gross floorspace, in such settlements to be exempt from the sequential test.

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it is in line with national guidance on the topic, as well as striking an appropriate balance between development opportunities and protecting the special qualities of the area as identified as a National Park. Any amendments will be made as appropriate to ensure the underlying aim of the policy is achieved. Confirm addition of sequential approach in line with planning policy guidance, and add that the referene to particular sized units would not therefore be reasonable. If a local shop was outwith a centre, etc and was supporting a local community, this would be a justification for it not being within a town centre, etc.

Response to 1st modifications

As per original objection, part a) of the policy should encourage retail and commercial development in the town centres, the policy as worded at present is negative in form. We suggest that retail development be removed from the sentence which requires development to 'add to the economic and vitality.'

We maintain our objection to this - i.e. small local shops (under a specified floor level, for example 200 sqm gross floorspace) should be exempt from the sequential approach.

CNPA analysis of response to 1st modifications

The wording is not considered negative as it states 'Development Will be favourably considered where'. In para 5.86 the reference to sequential testing states that 'applications may' be required to carry out such testing, and this leaves the position flexible so that appropriate assessments can be undertaken where they may have an impact, for example in a rural setting where even a small development may have an impact. No modifications are therefore proposed.

response to 2nd modifications

We also wish to maintain our previous objection (370b) to Policy 28 which states that small local shops (under a specific floor level, for example 200 sq. m gross floorspace) should be exempt from the sequential approach. This would reflect their nature and character as local shops and allow them to be situated outwith town centres in areas where there is an identified or likely need for such a scale of provision.

It is also considered that the revised part b) of Policy 28 should in making reference to "other sites within settlements" include out of centre sites as well as edge of centre sites to ensure consistency with national guidance on the sequential approach contained within SPP8.

We note from your most recent correspondence that the Authority has contacted the Scottish Government to request the services of a reporter to assist in the final consideration of the Local Plan through a Public Local Inquiry. In light of this we wish to confirm that our client wishes to use the written information submitted to date to form the basis of a Written Submission to the Local Plan Inquiry. Given the nature of the objections, our client does not wish to speak at the Inquiry.

WRITTEN

Objector 4251
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Aberdeen
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Agent Steve Crawford
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8 Victoria Street
Aberdeen
AB10 IXB

Company Scottish Enterprise Grampian

Policy/site Policy 28

Representation to Deposit Plan

This policy reflects the sequential approach presently applied to retail and leisure uses via Scottish Planning Policy 8 (SPP8). The policy is designed to support traditional town centres. This is a worthwhile aim. We would suggest, however, that the policy extends the provisions normally associated for retail and leisure to other “commercial” uses. The CNPA need to be clear on where this policy is to be applied. For example, an office development is a “commercial” development but need not be located in the town centre. Further clarification is needed to ensure that this policy does not stand in the way of non-retail/leisure use out-with town centres.

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it is in line with national guidance on the topic, as well as striking an appropriate balance between development opportunities and protecting the special qualities of the area as identified as a National Park. Any amendments will be made as appropriate to ensure the underlying aim of the policy is achieved.

Response to 1st modifications

Objection maintained.

CNPA analysis of response to 1st modifications

The policy relates to retail development. Other commercial development is considered in policy 27. No further modifications are therefore proposed.

response to 2nd modifications

HEARING

Objector	Name	Agent
020i	Dr A Watson Clachnaben Crathes, Banchory Kincardineshire AB31 5JE	

Company

Policy/site Policy 28

Representation to Deposit Plan

Should mention design and materials that have a potentially large landscape impact, e.g. the reflective surfaces in the new Ptarmigan Restaurant can be seen for 20 miles when the sun shines on them.

5.14, use of mix instead of mixture

CNPA analysis of objection to Deposit Plan

The issue of design and materials will be assessed through policies 17 and 18. In regard to the grammatical error, the amended text to support the policy has removed the para.

Response to 1st modifications

Objection maintained.

CNPA analysis of response to 1st modifications

The use of materials and impact on the landscape would be considered through policies 7 and 18. No further modification therefore proposed.

response to 2nd modifications

Thank you for your letter of 5 November. I am content for the written representations that I made earlier to be used for the public inquiry.

WRITTEN

Objector **Name** Cooperative Group
370a Property Division

Agent Lorraine Jones
GL Hearn
241 St Vincent Street
Glasgow
G2 5QY

Company Cooperative Group

Policy/site Policy 28

Representation to Deposit Plan

GL Hearn has been instructed by our clients, The Co-operative Group Property Division, to make the following representations in respect of the finalised draft Cairngorms National Park Local Plan. The Co-operative Group has retail interests throughout the Local Plan area including Market Town Stores in Ballater, Grantown-on-Spey, Newtonmore and Kingussie, which offer a wide range of goods to meet main food shopping demands for a larger catchment. In addition, these stores are complimented by Alldays stores in Braemar, Kingussie and Ballater.

The designation of village centre areas in the proposals maps of the finalised draft Local Plan is welcomed. SPP8 'Town Centres and Retailing' requires that Local Plans identify a network of town centres, and the designation of centres is welcomed as complying with this policy requirement. SPP8 further requires that Development Plans set out policies to support and enhance town centres.

In relation to the proposals maps, centres are designated as 'village centres'. However, Policy 21 'Proposals for Retail and Commercial Development' refers to 'town centres'. It would be helpful if there was continuity of definition in the Proposals maps and Local Plan text. We would suggest that the wording 'town/village centre' could be used.

As stated above, SPP8 requires not only that Development Plans identify a network of centres but that they contain policies which support and enhance their role. It is considered, for the reasons outlined in the following paragraphs, that Policy 21 does not give sufficient policy protection in relation to supporting and enhancing the role of town and village centres, and in addition does not fully follow the sequential approach to retail and commercial proposals required by SPP8. For example, Part a) of the policy refers to development proposals within the identified town centres but the wording of this could be interpreted as being somewhat negative in form. It is considered that the wording should be amended to be more positive and to specifically encourage retail and commercial development in town centres, in recognition of the valuable role played by them in the community.

In relation to the sequential approach required by SPP8, it is suggested that the wording of Policy 21 sits at odds with this national policy. For example, section b) of Policy 21 states that retail and commercial proposals which are outwith the designated area will be resisted if they undermine the existing commercial viability of the settlement, unless in the wider interest of the settlement. We would suggest that this does not follow national policy guidance in SPP8. The policy should be clear that new proposals should be located in identified centres and only where no location in the centre is available should an edge/out of centre location be considered. It should also include reference to edge of centre locations being sequentially preferable to out of centre locations, the policy as worded makes no differentiation between edge of centre/out of centre locations and this does not follow the sequential approach outlined in national policy.

In addition, a test in section b) of the Policy relates to whether a proposal will undermine the 'commercial viability' of the settlement. However, the approach

outlined in SPP8 is for consideration to be given to the effect of proposals on the vitality and viability of town centres, this is a wider test than 'commercial viability' and should be incorporated into the policy.

Section c) of Policy 21 similarly does not follow the sequential approach required by national policy. This relates to proposals outwith settlements and contains no requirement for a sequential approach to be taken, only that there is a specific locational need and that it can be demonstrated that there is no adverse impact on retail enterprises in the area. In this regard, the policy should be amended such that these locations are the least sequentially preferable and that such development proposals would require to demonstrate that there are no town/village centre sites; edge of centre sites or other more sequentially appropriate sites. In addition, national policy seeks to protect the vitality and viability of town centres as opposed to 'existing retail enterprises' and it is suggested that this should be revised also.

In conclusion, it is suggested that the policy does not follow the approach required by SPP8, could result in non-sustainable forms of commercial and retail development and does not give appropriate policy support to existing town and village centres in the Local Plan area. This could prejudice the vitality and viability of existing town and village centres, which perform an important function in the community. We suggest that the policy be reworded to take account of the issues outlined above, particularly to follow the sequential approach to retail and commercial development outlined in SPP8.

Suggested Modifications to resolve objection:

CNPA analysis of objection to Deposit Plan

The wording of the policy will be reviewed to ensure that it is in line with national guidance on the topic, as well as striking an appropriate balance between development opportunities and protecting the special qualities of the area as identified as a National Park. Any amendments will be made as appropriate to ensure the underlying aim of the policy is achieved. The use of terminology within the Proposals maps will also be reviewed to ensure clarity and consistency. It is suggested that the policy does not follow the approach required by SPP8, could result in non-sustainable forms of commercial and retail development and does

Response to 1st modifications

not give appropriate policy support to existing town and village centres in the Local Plan area. This could prejudice the vitality and viability of existing town and village centres, which perform an important function in the community. We suggest that the policy be reworded to take account of the issues outlined in the above. The changes to the policy address the concerns raised previously to an extent. We would, however, make the following representation to the modifications to it. The policy has had reference to 'commercial' development removed from its title, given that reference is made to general 'forms of development..', should this not be section, particularly to follow the sequential approach to retail and commercial development outlined in SPP8. retained?

The addition of the text at the start of the policy, reference to 'support local economic vitality' should be deleted as this matter is covered within the sections, excepting that we are suggesting that this be removed in relation to retail proposals in centres as regards section a) of the policy.

Revised section b). Should reference not also be made to out of centre sites (which are still within settlements)?

Revised section c). This refers to sites outwith settlements. Could this not be covered within section b), i.e. section b) addresses edge of centre and out of centre sites? Alternatively could section b) cover edge of centre sites and section c) covering other sites? The way the policy as amended is worded, means the application of the sequential approach not as clear as it could be.

Revised section c). This refers to retail uses associated with a rural business. If this is being included, in order to maintain control it is suggested that further criteria should be added to such uses, for example, size and the requirement that any retail uses should be connected to the use of the surrounding land/buildings.

Revised section c). It appears that there are words missing from the first sentence, in terms of clarifying that this section is setting out the circumstances when out of settlement proposals will be considered acceptable.

Revised sections b) and c). The last sentences of each are worded differently, for consistency, given that the aim of each appears to be the same, it is suggested that it would make sense to include identical wording for each.

CNPA analysis of response to 1st modifications

The title of the policy has been amended for clarity. The reference to economic vitality is intended to create a positive policy which encourages development. B) does include sites within settlements which are not identified as centres on the proposal maps. This would therefore include out of centre sites. Para b) and c) do refer to different locations and it is therefore considered appropriate to separate them in the policy. C) is not however intended to limit size of development, but rather allow for appropriate forms of development assessed on their merits. The wording of the 1st sentence of c) will be amended to read 'outwith town/villagewhere there is no town/village centre site, edge of town/village site, or other more sequentially appropriate site available; or the proposal is associated with a rural business.' The final sentence of c) will also be amended to read as in b). These amendments will be proposed as second modifications.

response to 2nd modifications

We write on behalf of our client the Co-operative Property Group in response to your correspondence of 05 November 2008 inviting comments or additional objections to the Second modifications to the Deposit Cairngorms National Park Local Plan.

Our previous correspondence to the Deposit Local Plan and First Modifications related to Policy 28 – Retail Development. The Second Modifications include alterations to Policy 28, which we acknowledge reflect some of our previous representations. We therefore welcome the Second modifications as published.

However, whilst the changes to the policy address the concerns raised to an extent, we would like to take this opportunity to highlight those matters that remain outstanding as maintained objections.

As per our original objection (370a) we believe that Part a) of Policy 28 should encourage retail and commercial development in town centres and that the policy as drafted appears to present a presumption against such development. We suggest therefore that retail development be removed from the sentence which requires development to “add to the economic and vitality...” as it should be considered that all new retail development will contribute to the economic growth, vitality and viability of the town centre, within which it is proposed.

WRITTEN

Objector **Name** Jamie Williamson **Agent**
439zf Alvie and Dalraddy Estate
 Alvie Estate Office
 Kinncraig, Kingussie
 PH21 INE

Company Alvie and Dalraddy Estate

Policy/site Policy 28

Representation to Deposit Plan

CNPA analysis of objection to Deposit Plan

Response to 1st modifications

Development proposals ... are met:

- a) Town/village centres - within identified ... settlement.
- b) Other sites within settlements - (where no town/village centre is available , edge of centre locations ... identification.) Such developments should not undermine the commercial vitality and viability of the town/village centre.
- c) Sites outwith settlements - (outwith town/village centres and settlements, where there are no town/village centre sites, edge of town/village sites or other more sequentially appropriate sites available; or are associated with a rural business). Developments should(also) demonstrate no adverse impact on the existing vitality or viability of (centres within) the area.

This policy as stated is unreasonably prescriptive and restrictive. It will act as a disincentive to further economic development.

CNPA analysis of response to 1st modifications

The idea of a sequential approach to site location for retail development is in line with government guidance on the topic. The proposed amendments would undermine this approach and no modification is therefore proposed.

response to 2nd modifications

WRITTEN

Objector 409i	Name William Stuart Paterson 3 Lynstock Park Nethy Bridge PH25 3EL	Agent
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Company

Policy/site Policy 29

Representation to Deposit Plan

I think people moving into to property within the park should be required to keep their property and land for a 5 to 10 year period before being allowed to divide property / land and building additional housing.

CNPA analysis of objection to Deposit Plan

The comment is noted but unfortunately is not something that could be reasonably included within Planning Policy. No modification considered necessary as a result of this representation. Confirm this form of restrcitive clause on any deeds of sale would not be a reasonable addition to any planning permission.

Response to 1st modifications

Objection maintained. Some concerns appear to have been addressed.

CNPA analysis of response to 1st modifications

The issue of residency criteria was not supported by the CNPA Board and was not therefore included in the plan. This position has not changed and therefore no further modifications are proposed.

response to 2nd modifications

WRITTEN

Objector 425zi
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Agent Steve Crawford
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Company Scottish Enterprise Grampian

Policy/site Policy 29

Representation to Deposit Plan

CNPA analysis of objection to Deposit Plan

Response to 1st modifications

We have a concern that Policy 29 may provide too much of an impediment to sustainable development.

CNPA analysis of response to 1st modifications

The comment is noted. The policy should also be read with the other relevant policies of the plan and is not considered to be unduly restrictive. No further modifications are therefore proposed.

response to 2nd modifications

HEARING