

## CAIRNGORMS NATIONAL PARK AUTHORITY

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**Title:** Draft Scottish Planning Policy: 'Sustainability and Planning' Consultation

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### **Purpose:**

To inform members of the Scottish Government's proposed changes to the Scottish Planning Policy and agree the key points of the CNPA's response.

### **Recommendation:**

#### **That the Committee:**

- **Note the proposed changes to the draft SPP and agree the key points of the CNPA's response;**
- **delegate responsibility for submission of the response to officers.**

### **Executive Summary**

The CNPA responded to the Scottish Government's consultation on a Draft Scottish Planning Policy (SPP) in July 2013. Following analysis of responses, the Scottish Government is proposing a change to the draft SPP that introduces a presumption in favour of development that contributes to sustainable development. This section of the SPP is now intended to replace separate sections on 'sustainable economic growth' and 'sustainable development' in the original draft SPP.

Following discussions with colleagues at Scottish Natural Heritage and Loch Lomond and The Trossachs National Park Authority we suggest that the CNPA responds positively to the proposed changes. If used, they will simplify and shorten the SPP as well as sending a clear message that the planning system is about balancing the needs of people now and in the future. That approach is clearly consistent with the aims of National Parks, with our National Park Partnership Plan and with our Local Plan and proposed Local Development Plan. The paper sets out our proposed positive response.

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## Background

1. The Scottish Government are reviewing Scottish Planning Policy (SPP) with the aim of the bringing the policy up-to-date, focusing it on sustainable economic growth and emphasising placemaking. A Draft SPP was published for consultation during summer 2013. The CNPA discussed a response with the planning committee after liaison with colleagues Loch Lomond and The Trossachs National Park Authority, Scottish Natural Heritage and other partners. A response was signed off by the planning committee chair and vice chair and submitted on 23 July 2013.
2. The Scottish Government received over 1600 responses to the consultation. Many responses questioned on the primacy given to sustainable economic growth and importance of job creation in the early part of the draft SPP. The Government is responding by suggesting replacing the Draft SPP principal policies on 'sustainable economic growth' and 'sustainable development' with a principal policy on 'Sustainability and Planning' and introducing a presumption in favour of sustainable development into the SPP.
3. The Scottish Government's commitment to the concept of sustainable development is reflected in its purpose. It is also reflected in the continued support for the five guiding principles set out in the UK's shared framework for sustainable development: achieving a sustainable economy, promoting good governance and using sound science responsibly are essential to the creation and maintenance of a strong, healthy and just society capable of living within environmental limits.
4. The consultation asks 2 principal questions about the proposed changes:
  - Q1. Do you think the SPP should include a presumption in favour of development that contributes to sustainable development?
  - Q2. Do you think the proposed approach to sustainability and planning is appropriate?
5. The documents are available here:
  - Draft SPP, Sustainability and Planning: <http://www.scotland.gov.uk/Publications/2013/10/3406>
  - Draft SPP: <http://www.scotland.gov.uk/Publications/2013/04/1027>
  - Consultation responses: <http://www.scotland.gov.uk/Publications/2013/08/1205>
  - Analysis of Consultation Responses Report: <http://www.scotland.gov.uk/Topics/Built-Environment/planning/NPF3-SPPReview/SPP-Review>

## The proposed changes to the SPP

6. The Draft SPP that was consulted on during the summer placed Sustainable Economic Growth at the front of the document, reflecting its importance as the Government's central purpose. It included policy principles explicitly linked to economic growth. It also referred to sustainable development as something the planning system should promote.
7. Both National Park authorities took the view that the importance of sustainable economic growth was consistent with way that we deliver the aims of National Parks in a collective and coordinated way. We are both used to balancing the needs of society now and in the future in our decisions, strategies and planning. The CNPA's response to the original consultation was positive about the focus on economic growth:

*“The Cairngorms National Park Authority (CNPA) welcomes the focus of the SPP on increasing sustainable economic growth. National Parks are ideally placed to deliver this purpose and are exemplars of how this can be undertaken while conserving the special qualities of unique parts of Scotland. In the Cairngorms National Park we are currently developing, along with partners, an Economic Diversification Strategy to give greater impetus to this approach. We suggest that this section of the SPP also makes specific reference to the importance of tourism as a growth sector contributing to sustainable economic growth.”*

8. Other responses were more critical, suggesting that the SPP would lead to short term economic benefits overriding other planning considerations that are intended to deliver sustainable development in the longer term.
9. The Government now proposes to amalgamate the sections of the SPP on Sustainable Economic Growth and Sustainable Development into one shorter section on 'Sustainability and Planning'. The proposed text provides a clear explanation of the role of the planning system in balancing many policy principles over the long term to support sustainable development and create sustainable places. The economic benefit of development remains an essential consideration but there is no sense that short term benefits would override other long term needs of society in the planning system.

## The CNPA's proposed response

10. We have discussed our proposed response colleagues at Scottish Natural Heritage and Loch Lomond and The Trossachs National Park Authority. We suggest that the CNPA responds positively to the proposed changes. If used, they will simplify and shorten the SPP as well as sending a clear message that the planning system is about balancing the needs of people now and in the future, taking into account all sorts of relevant information. That approach is clearly consistent with the aims of National Parks, with our National Park Partnership Plan and with our Local Plan and proposed Local Development Plan.

Q1. Do you think the SPP should include a presumption in favour of development that contributes to sustainable development?

Yes

The CNPA supports the proposed presumption in favour of development that contributes to sustainable development. We consider this approach to be consistent with the aims of Scottish National Parks and that sustainable economic growth is an integral part of it. We consider Scottish National Parks are exemplars of how sustainable development can be delivered.

Q2. Do you think the proposed approach to sustainability and planning is appropriate?

Yes

We consider the text and policy principles to provide a sound approach to sustainability and planning for the SPP. However, we query the use of term 'over-development' unless it is more clearly defined. It is often used subjectively by people who do not want or like new development, but needs to be defined in relation to some other measure such as service capacity, landscape capacity or other environmental limit. Otherwise, we anticipate objections to many plans and development proposals on the basis of a subjective term.

### **Next steps**

11. Following the Planning Committee discussion we intend to finalise our response in discussion with colleagues at LLTNPA before submission prior to the consultation deadline of 16 December. The finalised SPP is now expected to be published, along with the National Planning Framework, in June 2014.

**Gavin Miles**  
**December 2013**