

## CAIRNGORMS NATIONAL PARK AUTHORITY

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**Title:** Scottish Planning Policy (SPP) Planning for Rural Development - Public Consultation

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### **Purpose:**

The purpose of the report is to suggest a suitable response to the Scottish Executive's draft consultation document on Planning for Rural Development.

### **Recommendations:**

It is recommended that the following comments be forwarded to the Scottish Executive as the CNPA's response to the consultation document.

### **General**

1. The CNPA supports the objective of having a stable, or growing, rural population comprising all age groups and with a diverse choice of employment and housing opportunities. Within a National Park, planning policy is influenced by the four aims set out in the National Parks (Scotland) Act 2000 and this, inevitably, contrasts with circumstances in most of the rest of Scotland. The CNPA therefore considers that the SPP should be modified in its final form to be less uniform in its policy prescription and should allow for a greater or lesser degree of development promotion to suit local circumstances. Above all, it should be clear that development opportunities must be "plan-led" after consultation with local communities rather than ad hoc in nature.

### **The Role of Planning**

2. Reference is made in paragraph 9 to identifying sustainable locations for development "where infrastructure capacity and good access exist..." Within the Park there is an acute lack of sewage treatment capacity in virtually every settlement and Scottish Water's investment programme is so financially constrained that this is creating the single most serious impediment to development. The CNPA considers that much greater resources need to be applied quickly to this problem.

## **New Development**

3. The National Park is, in national terms, a “less populated area” as described in paragraph 11 and the CNPA is keen to encourage diversification, distinctiveness and individuality by the means described. In situations where there is conflict between social and economic objectives and protection of the natural heritage (referred to in paragraph 10) the CNPA is obliged to give greater weight to the latter and this, as mentioned above, is a consideration unique to the National Parks.

## **Economic Development**

4. The CNPA’s experience, from speaking to local people and the business community, is that the lack of affordable housing is the single most important constraint on economic development and the infrastructure deficiencies referred to above are the second most important. In many ways adequate, affordable housing has to precede rather than follow new employment opportunities. The connection between the lack of affordable housing and the loss of young adults referred to in paragraph 13 is very direct and needs to be explicitly acknowledged.
5. The CNPA agrees that business tourism and sustainable tourism are appropriate to the National Park as stated in paragraph 14.

## **Diversification**

6. The CNPA supports the objective of diversification and looks forward to receiving further guidance on proposals for achieving this.

## **Housing**

7. The CNPA considers that housing, in particular to provision of affordable housing, is the most serious and intractable problem that it has to deal with. The shortage of it impinges in a negative way on the whole spectrum of social and economic objectives referred to in the SPP. The CNPA intends to allocate sites specifically for affordable housing and decisions on the scale and location of the provision will be made in the context of local need and in consultation with the relevant authorities. To give effect to those actions it is essential that Communities Scotland leave sufficient funding to sustain the development programme and that Scottish Water can provide the complementary water service infrastructure. As stated in paragraph 19, affordable housing is provided primarily through Registered Social Landlords but there needs to be greater clarity about the definition of affordable housing and the means which can be used to engage private developers in the process. The good practice advice promised in the footnote under paragraph 23 will no doubt be helpful in this respect and is eagerly awaited.

8. Reference is made in paragraph 20 to the Forestry Commission being keen to sell surplus land to Registered Scotland Landlords. This is an excellent idea and the CNPA suggests that there are other public bodies with landholdings that could give similar assistance and should be identified in the final version of the SPP.
9. The CNPA considers that it will be difficult in servicing and conservation terms to meet the whole spectrum of housing types referred to in paragraphs 18 to 24 and its priorities will be to meet the need for affordable housing and general needs housing for people with established local connections and a contribution to make to the local economy. A National Park has an uncommonly strong appeal for retirement houses, weekend houses, second homes, holiday homes and even commuter housing for those whose principal employment is elsewhere. These cannot be generally acclaimed as appropriate to the Park and compatible with its aims. An appropriate provision, through the local plan process, of timeshare and holiday accommodation of various types may be a better way of giving people with no economic links with the Park an opportunity to experience its special qualities.
10. The case for creating greater opportunities for general and affordable housing plots in the countryside will be examined positively in the local plan process balancing the obvious benefits of increased housing choice against the four park aims and the sustainability and access criteria referred to in the SPP. The CNPA is sceptical about the suggested links between “top of the range housing plots” and entrepreneurs bringing new businesses to rural areas. It also considers that it would be difficult, in the Park context, to imagine plots being created on a scale necessary to have a depressing effect on land values without having a suburbanising effect on the landscape.
11. On a more general point, not arising directly from the SPP but linked to these issues, the CNPA regrets that planning permissions are, except in the rarest of circumstances, tied to land rather than individuals. In consequence, consents are traded on an open market in which local people are too often disadvantaged. The right to buy policy in relation to council housing and downstream sale of these properties has exacerbated the affordable housing problem.