

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: **CONSULTATION ON DRAFT:
SCOTTISH PLANNING POLICY 17
PLANNING FOR TRANSPORT.**

Prepared by: **DENIS MUNRO,
INTERIM PLANNING MANAGER**

Purpose

This aim of this report is to respond to the Scottish Executive on their Draft Transport Planning Policy.

Recommendations

It is recommended that the Committee:

- (1) Advise the Scottish Executive that the CNPA's only comments on the draft SPP 17, Planning for Transport is in relation to its provisions for the A9 policy at paragraph 64 in which respect it does not object to future policy being a matter for the relevant local authorities, and,
- (2) Advise Highland Council and Perth and Kinross Council that the CNPA supports the stance adopted by Highland Council at its meeting of 18th December 2003.

Executive Summary

The SPP 17 Planning for Transport: Consultation Draft, contains general policies for all forms of transport at a national level, including sustainable forms of transport such as walking, cycling and public transport. Most of the provisions are unremarkable but, in the very last section, the document announces that the Scottish Executive intends to lift its commitment to the ban on roadside services on the A9. This restriction has been in force for 30 years and, until now, has had the joint support of the Scottish Executive and the local authorities which have jurisdiction over the A 9 from Perth to the Cromarty Firth. The Scottish Executive is indicating that from now on the restriction, if it is to continue, will be a matter for the local authorities (Highland and Perth and Kinross).

The Committee is invited therefore to consider the response it wishes to make to this policy change.

Background

1. SPP17: Planning for Transport, will replace the existing NPPG 17 (National Planning Policy Guideline): Transport and Planning, April 1999. Its policies are general and wide-ranging, for implementation at a regional and national level; as such there is little that requires comment from the CNPA. There is, however, one 'localised' policy which is of direct significance to the CNP; this is the A9 policy in section 64, which is reproduced below.
2. A9 policy:

64. On the reconstructed A9 from Inveralmond (Perth) to Arduillie on the Cromarty Firth there has been a long-standing policy embodied in structure plans of restricting service facilities to those provided in the bypassed settlements. In the 30 years since A9 reconstruction was completed the bypassed settlements have adapted their economies to this new role quite successfully. It is proposed that national policy for the A9 should now revert to the general considerations under **Development affecting trunk and other strategic roads**, and **Roadside services facilities provision - General and - Other Trunk and Strategic Roads** above. Should under this policy the local authorities decide that roadside facilities on the A9 are acceptable, design quality will be an additional paramount consideration of continuing national concern. Development should complement the special character of the area, including the Cairngorms National Park.

Issues for the Cairngorms National Park

3. Until now, Highland Council and Perth and Kinross Council have not been free to take an independent view of the level of restriction, if any, which might apply to the A9. I understand that in response to the consultation document Perth and Kinross Council has indicated to the Scottish Executive that it has no objections to the Scottish Executive effectively opting out of this issue. The length of the A9 over which the present policy restriction applies within Perth and Kinross is covered by two local plans each of which reflect exactly the current Scottish Executive policy and no immediate steps are being taken to alter the status quo. The situation will be reconsidered as and when the local plans are reviewed.
4. In Highland, the full Council made a decision on 18th December 2003 as follows:

The Council AGREED the terms of the Notice of Amendment to approve the Officer recommendations to: -

- (a) endorse the conclusions of the A9 Services Policy Working Group as outlined in Paragraph 4.1 of the Report PDET 65/03;
- (b) agree, subject to the publication of a Draft SPP and/or an invitation for views in respect of any National Park Local Plan(s), to include the above

conclusions as part of the Council's representations to the Scottish Executive and/or the National Park Authority, whichever was appropriate. Such matters would be subject to further approval by Committee in the context of any wider representations the Council wished to convey on these matters; and

- (c) explore with partner agencies - HIE, Cairngorms National Park Authority and the Scottish Executive and the appropriate Council Services, the means by which the objectives set out in Paragraph 4.1 of the report could be implemented.

5. The Working Group's conclusion referred to in the minute is as follows:

“The Working Group has weighed the factors in favour and against the provision of A9 services at the roadside and regards as paramount, the priority to be given to safety. Against these considerations, the majority Working Group view is that the following package of policy measures and related initiatives should be pursued and extended to the entirety of the route in Highland:

- that existing settlements should provide a full range of services including where viable 24 hour provision (including for HGV's), together with a strategy to enhance the signing and promotion of the by-passed communities including within lay-by's;
- that, south of Inverness, Ralia and Blackmount (Carrbridge) should be the focus for promoting the by-passed communities in Badenoch and Strathspey with information, toilets and light refreshments and picnic facilities for north and southbound traffic respectively. Catering facilities would be taken forward in consultation with local communities, although it was acknowledged that only one of these locations may support a *commercial* opportunity;
- that, notwithstanding the specific opportunities - within Badenoch and Strathspey – above, safe and secure, enhanced picnic, information/rest and toilet facilities should generally be provided at 25 mile (40km) intervals. Such terms would embrace the existing facilities at Drumossie and North Kessock on the approaches to Inverness.”

6. As a consequence of the above decisions by the local authorities there seems little prospect of any new commercial facilities on the A9 for the foreseeable future and the CNPA may therefore wish merely to note the proposed change signalled in the draft SPP. Alternatively it may wish to take a stance in support of, or at variance with, those of the local authorities. It may equally wish to encourage, or discourage, the Scottish Executive from leaving future policy decision on this issue to the local authorities.

7. Taking an informed view on the case for or against change of the policy is made difficult by the impossibility of finding sufficient evidence for an “objective” view of the benefits and disbenefits of the existing policy or possible changes to it. A number of studies have been carried out by consultants and public officials but, inevitably, they have been based on assumptions each of which introduces a source of frailty into the conclusions. The best and most concise description of the arguments I have seen for and against change are contained in a report by Highland Council’s Director of Planning and Development dated 6th November 2003 which summarises the arguments as follows:

For change

- visitors are drawn into communities irrespective of the services available. The economy is diverse and not dependent on passing trade. The effect of A9 services will be less than feared. A9 users should not be expected to detour into communities for basic facilities.
- the current situation is no longer sustainable from a road safety perspective and commercially attractive services, strategically placed, would encourage drivers to break their journey.
- it is a reasonable expectation of A9 users and visitors to the Highlands that services are available at the roadside every 50-60 miles. The existing policy is out-dated and services within communities are often seasonal.
- HGV’s should be able to access basic rest/refreshment facilities without diverting through communities and giving rise to safety and environmental problems as well as increasing journey times.

Neutral

- it is possible to provide A9 services without breaching the existing policy.
- different circumstances apply north and south of Inverness. A common approach is not appropriate, although the principles of good design apply in all circumstances.
- services developed and operated by the local communities themselves could be acceptable (Without prejudice, the Council is inviting offers for vacant accommodation at Ralia. Interest in providing catering facilities has been expressed by a Newtonmore business/community interest).
- further out-of -centre developments at Inverness should be resisted. Favoured locations south of Inverness are Ralia and Blackmount. There are mixed views about the suitability of Dalwhinnie.

Against change

- the case that A9 services would improve safety is not proven. Services could make driving conditions more hazardous. Accident figures require to be evaluated and evidence presented to sustain the argument that roadside services would make a difference.
 - accidents are often caused by frustration and fatigue. Priority should be given to a programme of physical improvements to the A9 with additional dualling and junction improvements.
 - promotion of by-passed communities and the services available there is not effective. “Tiredness Can Kill” signs need to be supported by attractive stopping places. Rest areas with accessible toilet and refreshment facilities would suffice.
 - services located on the A9 will affect the viability of businesses within the fragile by-passed communities. Many continue to hang by a thread.
 - there is no justification for roadside fuel facilities. Drivers re-fuel at either end. This would cause the demise of existing petrol filling stations within communities and the secondary, lifeline services which attach local outlets and draw local traffic onto the trunk road.
 - it is essential to protect the A9 from piecemeal development pressures which would threaten communities, spoil a unique landscape and undermine safety
 - community benefits would not arise from roadside services. Opportunities would be franchised to the national operators. The policy should not be breached and there should be no submission to commercial pressures.
8. The same report states that broadly, though not exclusively, representations in favour of A 9 services are made by the Northern and Tayside Police, the Road Haulage Association, motoring groups and community/business organisations within and north of Inverness. Those expressing strongest opposition to A 9 services are predominantly business/community interests within Badenoch and Strathspey, The Highlands Cycle Campaign and the Scottish Green Party.
9. A factor which may have a bearing on the CNPA’s view on any future A9 policy would be our intentions in relation to a Gateway facility of some description along the A9 in recognition of the road’s role as principal means of visitor access to the Park. If the existing policy continues to apply any Gateway facility would have to be in a settlement - or at least physically removed from the road. It might, perhaps, be integrated with the facilities envisaged in paragraph 5 for Ralia or Blackmount.

Conclusion

In view of the decision recently taken by Perth and Kinross and Highland Councils the Scottish Executive's draft intentions of withdrawing its long standing policy guidance will have no immediate effect although it could lead to a situation in the future where the councils take up different policy stances leading to different circumstances along the route. In my view, this is a matter that can properly be left to the local authorities but, it is hoped, taking a joint strategic overview. On that basis, there is no reason to object to the Scottish Executive's withdrawal from the issue. A recommendation on the most appropriate stance to take in relation to the content of future policy is more difficult to make but Highland Council's resolution of 18th December 2003 seems to me to be very sensible providing, as it does, for enhanced, largely non-commercial, facilities for travellers in a way which might be expected to relieve driver fatigue with the minimum risk of damaging the established network of service provision in the bypassed communities.

Denis Munro
29th April 2004