

ANNEX I

Review of Scottish Planning Policy and National Planning Framework 3:

Response by the Cairngorms National Park Authority – *WORKING DRAFT*

National Parks in Scotland

Scotland's National Parks are national assets. They are internationally recognised visitor destinations that showcase the very best of Scotland's environment. Our National Parks can be models of sustainable rural development, generating growth, enhancing landscapes and biodiversity, supporting thriving communities and getting the best from our land. They are models of a collaborative approach to management delivering for people and place.

Scotland's National Parks share four aims:

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of the natural resources of the area;
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
- To promote sustainable economic and social development of the area's communities.

The Cairngorms National Park Partnership Plan 2012-17, approved by Ministers in May 2012, sets out the vision, priorities and policies for the overall management of the National Park by partners.

Cairngorms National Park Authority

The Cairngorms National Park Authority is an NDPB charged with bringing together the collaboration needed to deliver the aims of the Park collectively and in a co-ordinated way. Under a unique arrangement, the Authority shares planning powers with five local authorities in the National Park. The National Park Authority is the planning authority responsible for the development plan for the Park, and it has the power to call in and then determine planning applications that are of significance to the aims of the National Park.

Key Issues

National Parks as national assets

We would like to see both SPP and NPF3 identify National Parks as national assets, to both the economy and environment, in which planning plays a positive role in delivering sustainable rural development.

The National Park designation

We would like to see SPP set out a policy basis for considering and safeguarding the integrity of the National Park designation and the special qualities which underpin designation, including the landscape qualities.

Planning for Tourism

We suggest that SPP and NPF3 address the role that planning plays in enhancing the tourism infrastructure in support of the national tourism strategy. Specifically, we would welcome recognition that National Parks are national tourism assets which can benefit Scotland as a whole, in which high quality tourism infrastructure is required to meet visitor expectations.

Connectivity

SPP and NPF3 can help to support better physical and digital connectivity. We propose that the improvements to the A9 should be a national development in order to support the co-ordinated approach to delivering a high quality route essential to the Highlands and Islands economy and tourism experience. SPP and NPF3 can also show how new development should help deliver government commitments on digital connectivity, including broadband access in remote areas.

Energy

The monitoring statement for NPF2 made specific reference to the renewable energy agendas being delivered in Scotland's National Parks. We would welcome specific reference to the opportunity for the National Parks to contribute appropriately to renewable energy targets alongside recognition of the agreed policy of both National Park Partnership Plans that large scale commercial wind turbines are not appropriate in National Parks. We would also welcome greater guidance in SPP on how the cumulative impacts of windfarms should be considered in planning decisions.

Scottish Planning Policy

Given that National Parks are relevant to many of the topic areas covered in SPP, and that similar expectations and opportunities for delivery of these topics in National Parks will run across many topic areas, it may be worth considering whether a general introduction to the role and status of National Parks in planning policy could be included in an early section of SPP. Such a section could highlight the:

- Opportunity to deliver innovative approaches to sustainable rural development in National Parks;
- Expectations of high quality design and infrastructure to support the economic and environmental asset of National Parks;
- Expectation that the special qualities which underpin National Park designation will be conserved and enhanced.

Such an approach would support the 'place-making' focus of the review, emphasising the role of National Parks in managing two of Scotland's most special places for the benefit of people across Scotland and beyond.

The National Park Designation

SPP provides an opportunity to set out the expectations of Ministers in relation to how planning policy should be interpreted to support the delivery of national objectives through National Parks. The current Cairngorms National Park Partnership Plan (approved by Ministers in May 2012) provides the most up to date expression of the Scottish

Government's intentions for the Cairngorms National Park. The Ministerial foreword and covering letter to delivery partners is attached for reference.

The current SPP repeats the aims of the National Park as set out in the National Parks (Scotland) Act 2000. We ask that the revised SPP takes the opportunity to provide more guidance than simply repeating the aims. We also note that the current SPP refers to the first aim being the 'primary aim' which is an over-simplification of the terms of the National Parks (Scotland) Act 2000. The Act is clear that the primary driver is to deliver all four aims collectively and that, if there appears to the National Park Authority to be a conflict, the first aim should take 'greater weight'.

In particular, we ask that the SPP sets a policy test equivalent to other national designations to the effect that development in or affecting a National Park will not adversely affect the integrity of the area or the qualities for which it has been designated.

This policy test would provide clarity for all parties on how to consider the National Park designation in planning terms and ensure that the landscape value of National Parks is considered within the spirit of the European Landscape Convention.

This policy test would provide a framework for addressing issues in and affecting the landscape setting of a National Park, where there is currently a policy void. The CNPA remains very concerned about the absence of a clear framework within which to consider the impacts of developments outside a National Park that impact on the integrity of the designation or its special qualities. To be clear, we do not seek or advocate a 'buffer zone', so do not seek to change the current presumption against such zones. We do seek a clear basis for, where relevant, a case-by-case assessment of impacts on the designation in a similar way to other national designations such as National Scenic Areas.

A further advantage is that incorporating this test within SPP would be a key step towards the simplification of the designation picture within National Parks, by creating the conditions in which the National Scenic Area designations within the National Park could be removed. In addition to now having the National Park Partnership Plans in place, the parallel step required is in relation to specific permitted development rights, on which the Cairngorms National Park Authority put forward the appropriate proposals in the recent consultation.

Housing

In preparing and implementing the development plan for the National Park, the National Park Authority has to work across five housing authorities and cut across established housing market areas, for example when dealing with housing need and demand assessments. SPP could help the effective delivery of housing in National Parks by recognising the need for effective joint working and the role that National Park Partnership Plans should play in directing the housing strategy within National Parks.

We would also welcome clear recognition that methods of delivering affordable housing must change to reflect the current economic conditions and set out what more flexible approaches could and should be taken.

Connectivity

SPP could help to set out how new development will maintain the momentum and delivery of the Government's targets for broadband and digital connectivity. The current Scottish Government programme addresses the needs of existing premises and will work to help future proof capacity for any new premises that are built. The specifics of how broadband infrastructure will be provided for future developments is unclear though. Where there is a commercial case it is likely it will be installed by the private sector/developer. In more remote and rural areas such as the Cairngorms National Park, however, broadband infrastructure may not be installed as a matter of course – either by the commercial sector or the developer. SPP help set out how this should be addressed.

National Planning Framework 3

National Parks as national assets

We would like to see National Parks identified in NPF3 as national assets which contribute to both the economy and environment of Scotland. National Parks are international tourism destinations, showcase some of the best of Scotland's environment and are places for Scotland's people to enjoy and take pride in. The Cairngorms National Park, covering approximately 6% of Scotland's land area, offers an accessible wilderness, combining a large scale landscape of international conservation value with a well developed tourism infrastructure contributing to Scotland's economy.

The governance model of Scottish National Parks depends on a place-based approach to collaboration across organisations and remits, which is directly relevant to delivering the benefits of a sense of place identified in the NPF3 review.

National Developments

We propose that the A9 improvements are classed as a national development. Between Inverness and Perth approximately 80 miles of the 110 mile route is single carriageway. The Scottish Government's Infrastructure and Investment Plan supports full dualling of the A9 between Perth and Inverness by 2025. A significant stretch of the A9 passes through the Cairngorms National Park, it is the entry point to the National Park for most visitors, and defines the experience of the National Park for many drivers passing through. There is therefore an opportunity to ensure that the improvements to the route maximise the tourism value by ensuring high quality design and associated infrastructure/visitor facilities. Our proposal below to set out in NPF3 'national scenic routes' is relevant here.

Tourism

Tourism is a large part of the highlands and islands economy, and is a very significant source of employment in many areas. The Cairngorms National Park is a tourism asset to the Highlands and Islands and Scotland as a whole. NPF3 can support tourism, and help it grow by:

- Identifying a network of long distance paths and trails extending into the Highlands and Islands, including those within the Cairngorms National Park.
- Identifying key tourism 'national scenic routes', such as the A9, that could be developed in a co-ordinated way to deliver improvements to the facilities and visitor experience in a way that improves the national tourism offering.
- Identifying the Cairngorms National Park as one of the key assets for tourism, positioning the National Park as one of a suite of assets and opportunities.

Connectivity

Better connections, both physical and digital, are essential for the sustainable economic growth of the Cairngorms National Park and surrounding regions. NPF3 can help this by:

- Illustrating the commitment to dual the trunk roads and enhance railway capabilities between the seven cities.
- Illustrating other ambitions on the strategic transport network, including improvements to the A95.
- Reflecting the importance of air travel connectivity in the Highlands
- Facilitating wider and faster coverage of mobile and fixed broadband to support business locations, service the visitor economy and bring new opportunities to remote communities.

Energy

The energy sector is a huge economic opportunity for the Highlands and Islands and the Cairngorms National Park is contributing with a renewables agenda that contributes to national targets and rural development. NPF3 can support this by:

- Providing a steer on the capacity for accommodating onshore wind energy of different parts of Scotland. Identifying the areas requiring significant protection may be an appropriate approach to this at the national level.
- Reflecting the recently approved National Park Partnership Plans for both National Parks which set out clear policy support for small scale renewable energy generation, particularly hydro and woodfuel, as part of a rural development agenda, combined with a policy that windfarms are not appropriate in a National Park.
- Showing, as NPF2 does, the future electricity grid upgrades required to support the ambitions for further onshore and offshore renewables generation.

Scottish Sustainable Communities Initiative

We would welcome continued commitment to SSCI in NPF 3 and it would be helpful if the communities in question are named and mapped, including An Camus Mor in relation to the Cairngorms National Park.