

## CAIRNGORMS NATIONAL PARK AUTHORITY

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**Title:** Scottish Planning Policy and National Planning Framework 3 Consultation

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### **Purpose:**

For members to discuss and agree the key points for the CNPA's response to the Scottish Government consultations.

### **Recommendation:**

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

- agree the key issues that CNPA wish the review of SPP and NPF3 to address, and
- delegate responsibility for submission of the response to officers in consultation with Convener and Vice Convener.

### **Executive Summary**

The Scottish Government has published two documents for consultation - the Main Issues Report and Draft Framework for Scotland's third National Planning Framework (NPF3) and a revised Draft Scottish Planning Policy (SPP).

The National Planning Framework (NPF) is a long-term spatial plan for Scotland. It sets out where, from a national perspective, key development and infrastructure improvements should take place. The current consultation paper seeks views on the Main Issues Report and Draft Framework.

SPP is a statement of Scottish Government policy on nationally important land use matters and sets out Minister's expectations of the way the planning system in Scotland should operate. It informs the content of development plans, decisions on planning applications and appeals, and how proposals are to be developed.

The Scottish Government is reviewing these two documents at the same time to enable connections to be made between *where* development should be located (NPF3) and *how* this should be delivered (SPP). The intended outcome will be an improved, up-to-date and robust national basis for enabling development. When finalised, these will be important parts of the Scottish planning system.

This paper sets out the key points that we propose the CNPA's response should include and has been informed by discussions with Loch Lomond and the Trossachs National Park Authority staff. Both Park Authorities are working closely to ensure our responses contain a set of common messages and that, where we make suggestions for changes, we propose the same wording.

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## Background

1. In December 2012, the Board considered the CNPA's response to the Scottish Government's consultation on the changes that would be needed in the third National Planning Framework (NPF3) and a revised Scottish Planning Policy (SPP). The current consultation is on the Main Issues Report and Draft Framework for NPF3 and on a draft SPP. The documents are available here [www.scotland.gov.uk/Topics/Built-Environment/planning/NPF3-SPP-Review](http://www.scotland.gov.uk/Topics/Built-Environment/planning/NPF3-SPP-Review).
2. In our response we identified some key issues for the Scottish Government to consider:
  - National Parks as national assets and the role of planning in delivering sustainable rural development
  - The National Park designation – safeguarding the special qualities that underpin the designation
  - Planning for Tourism – addressing the role that planning plays in delivering the Tourism Strategy for Scotland
  - Connectivity – supporting better physical and digital connectivity
  - Energy – opportunities in National Parks for renewable energy but not as places for large scale commercial wind turbines
3. We worked with Loch Lomond and the Trossachs National Park Authority (LLTNPA) to ensure both Scottish National Park Authorities provided common responses.
4. Both NPF3 and the draft SPP now strongly assert the importance and opportunity of Scotland's National Parks which are cited as being '*key assets and exemplars in sustainable tourism*'. Both documents also affirm the need to protect National Parks and the draft SPP identifies these as '*national designations in which development should only be permitted where:*
  - a. *It will not adversely affect the integrity of the area or the qualities for which it has been designated; or*
  - b. *Any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance*'.

5. In relation to onshore wind energy, NPF3 and the draft SPP both recognise National Parks and National Scenic Areas as being Scotland finest landscapes. The draft SPP identifies these as '*Areas where wind farms will not be acceptable*'. The draft SPP also recognises the unique planning position for National Parks in relation to planning for housing and invites views on how best to address it.
6. Overall, the incorporation of the NPA's original comments within these nationally important land use planning documents is to be strongly welcomed and supported. Both documents recognise the important contribution that National Parks are making to the Scottish Government aims and aspirations for sustainable economic growth, as well as providing a strong government steer on the importance of National Parks as being landscapes worthy of significant protection.

### **Approach to this Consultation**

7. Officers have discussed the main issues arising from the consultation with colleagues in the LLTNPA and are working closely to ensure that our responses contain a set of common messages and that, where we make specific suggestions for changes, we propose the same wording.
8. This paper sets out key points for the Planning Committee to consider. We propose to use the points from the discussion to inform the detailed response to the Scottish Government and ask that the Committee delegate responsibility for submission of the response to officers in consultation with Convener and Vice Convener.

### **National Planning Framework 3 (NPF3) Main Issues Report and Draft Framework**

9. The National Planning Framework (NPF) sits at the top of the hierarchy of Scottish Government development plans. Once published in June 2014, NPF3 will set out the Scottish Government's strategic development priorities over the next 20-30 years and can designate '*national developments*'. Subsequent development plans and planning decisions should support the NPF3 and it will be used to inform the future policy and investment decisions of the Scottish Government, its agencies and other organisations
10. Supporting sustainable economic growth and the transition to a low carbon economy are the key themes for NPF3. It states that the planning system has an important and very positive role to play in ensuring that Scotland is recognised as being '*open for business*'. Its vision and proposed strategy for Scotland are set out through four key priorities:
  - *A low carbon place;*
  - *A natural place to invest;*
  - *A successful, sustainable place;*
  - *A connected place.*

11. Each of these themes and sections of the consultation document set out the Government's proposed approach and ask questions. We have set out what we consider to be the key points for our response to address in four sections below.

***A low carbon place***

12. This section of NPF3 states that Scotland will be a world leader in low carbon energy generation. The built environment will be more energy efficient, produce less waste and transport networks will be largely decarbonised. Proposed key points for response:
- We welcome the priority given to reducing energy demand as an essential part of the NPF3 strategy and to the recognition of the importance of heat generation and the need to move to renewable sources of heat. The Cairngorms National Park has an existing biomass districting heating scheme and others planned. We also have significant growth in domestic and commercial biomass heating systems and a woodfuel action plan to support a sustainable supply chain.
  - We support that NPF3 refers to National Parks and National Scenic Areas as Scotland's finest and most iconic landscapes where the Scottish Government does not wish to see new windfarms.
  - There is need for recognition in NPF3 of the potential for windfarm development around the boundaries of National Parks to have adverse effects on the special qualities of the Parks. This is a critical issue for both National Park Authorities and we will suggest wording to reflect the issue and mechanisms to deal with it.

***A natural place to invest***

13. This section of NPF3 recognises the importance of protecting the environment and also the value of the environment to the economy, identity and quality of life. The scenic qualities of Scotland's landscapes are a spectacular resource, contributing hugely to quality of life, cultural identity and the visitor economy. Proposed key points for response:
- There is potential for NPF3 to say more about the potential of National Parks as places to invest and manage land to meet climate change targets, specifically by extending forest cover, developing ecological networks and as areas suitable for strategic environmental enhancement.
  - We support NPF3's recognition of the role of tourism and recreation to the visitor economy and need for the planning system to help deliver appropriate infrastructure; but that the planning system alone will not deliver it and NPF3 could reinforce the need for a coordinated partnership approach around key destinations such as National Parks to secure tourism growth and a higher quality visitor experience;

- That National Parks are models of where a successful collaborative approach to management delivers multiple benefits. The approved National Park Partnership Plans set out what is to be achieved through partnership working and how National Parks are models of sustainable rural development, generating growth, enhancing landscapes and biodiversity, supporting thriving rural communities and getting the best from our rural areas. Enhanced collaboration between local authorities and national agencies such as Scottish Enterprise, HIE and VisitScotland is required to help attract more private investment in tourism. The NPF3 could more strongly advocate such partnership working around the key destinations;
- We support the recognition in NPF3 of long-distance routes as a key recreational resource and significant tourism development opportunity and that we support designating them as a national development. We already have within the Park the most extensive core paths network in Scotland by area and are currently consulting on designating further core paths as part of the proposed Local Development Plan. The Speyside Way extension to Newtonmore has already been approved by Ministers and is under development. We will work with SNH, Sustrans and partners to propose the following additions to the national long-distance network:
  - extension of the Deeside Way to Braemar
  - development of the Speyside Way for wider range of users
  - an off-road route linking Grantown to the National Cycle Network 7 through Dulnain Bridge and Carr Bridge
  - Upgrading the Speyside Way spur to Tomintoul for a variety of users
  - Linking Speyside Way spur back to the main route at Nethy Bridge.

***A successful, sustainable place***

14. This section of NPF3 considers future distribution, scale and patterns of built development, focussing on place-making, green networks, health and homes. Proposed key points for response:

- This section of NPF3 is closely linked to the draft SPP. The spatial information on population change, household change and house completion rates is presented on local authority boundaries. There is an opportunity to use planning authority boundaries here (which would include local authorities and National Park Authorities) to highlight that there are particular issues and challenges in these special parts of rural Scotland that may require different approaches to manage.
- Note that it is not proposed to designate the suite of Sustainable Communities Initiative projects as national developments but highlight opportunities presented by such a national scheme to raise standards of sustainability and press for appropriate references in the text.

***A connected place***

15. This part of the strategy explores transport and digital links, within Scotland and worldwide. Proposed key points for response:
- Support the suggestion that NPF3 includes the development and promotion of key scenic corridors such as the A9 but also suggest that established scenic/ tourist routes are considered, including the Highland Tourist Route (Aberdeen to Inverness) and the Deeside Tourist Route (Perth to Aberdeen).
  - Support development of the Scottish Tourist Routes Project around key scenic corridors and look forwards to implementing a number of roadside viewing platforms and enhanced view points in the Park.
  - Support the suggestion that NPF3 will reflect the ambition to significantly increase in walking and cycling in and around our settlements and the opportunities for visitor experience, health, decarbonisation of transport and reducing the need to travel. There are opportunities for NPF3 to say more about use of Core Paths Plans as a tool to achieve this ambition across Scotland.
  - Support the Infrastructure Investment Plan concerning next generation broadband and highlight the particular challenges of remote and rural areas in a mountainous environment and the special attention required to ensure that such areas are not left disadvantaged.

**Draft Scottish Planning Policy (SPP)**

16. The Scottish Government considers that a review of SPP is necessary in order to update policy, focus policy on sustainable economic growth and emphasise place making. It is focused around three planning outcomes:
- I. Planning improves Quality of Life by helping to create well-designed, sustainable places for Scotland's people;
  - II. Planning protects and enhances Scotland's built and natural environments;
  - III. Planning supports sustainable economic growth and the transition to a low carbon economy.
17. The draft SPP then sets out proposed policy direction for a wide range of planning topics and issues. The Scottish Government has included many of the issues that the CNPA and LLTNPA asked to be addressed in our earlier responses so the main differences between the current SPP and the proposed SPP are:
- The new draft emphasises that planning should play a key role in facilitating economic recovery and sustainable economic growth in the longer term.
  - That the planning system should attach significant weight to economic benefits, particularly the creation of new jobs, and recognise and respond positively to economic and financial conditions.

- The policy on place-making and good design is now clearly embedded within national planning policy as a principal, overarching policy relevant to all development.
- National Parks are recognised explicitly in their own right and in relation to a range of different policy topics, including housing.
- The policy on spatial frameworks for windfarms has been changed and recognises the direction in National Park Partnership Plans that windfarms are not appropriate in National Parks (or NSAs). The policy also provides some clearer direction for other parts of Scotland, though the need to protect National Parks from the effects of windfarm development outside their boundaries requires further clarification.

18. Proposed key points for response:

***National Parks (paras 72-73)***

- We welcome the specific reference here but the wording in relation to the National Parks (Scotland) Act 2000 requires modification to be consistent with the legislation. Also, National Parks are referred to here in the context of rural development. Our suggestion is that the wording be revised to recognise that National Parks are special places with special management needs and to highlight the role of the National Park Partnership Plans in providing the strategic framework for rural development in these areas. It would be helpful to provide appropriate cross references to the Subject Policy concerning national designations and links to the legislation and the Park Partnership Plans as key documents.

***Enabling Delivery of New Homes (paras 79-90)***

- The draft SPP clarifies the particular approach to identifying and meeting housing requirements in National Parks. In practice this is similar to the approach taken already where we have used the local Housing Authorities Housing Need and Demand Assessments to help identify housing land requirements. We welcome the statement that that National Park Authorities do not need to meet housing requirements in full in their areas, but must liaise with housing authorities to ensure housing requirements are met across the housing market area. This approach should help National Park Authorities develop appropriate mechanisms to new housing provision within their areas.

***Affordable Housing (paras 94-99)***

- The draft SPP suggests that affordable housing should generally be no more than 25% of a development. This is a constant issue for both National Park Authorities. On the one hand, need for affordable housing can vary greatly within different parts of the a National Park, while on the other hand, achieving development with 25% affordable housing is difficult in the current economic conditions. Both National Park Authorities would like the level of affordable housing to be at around this level but retain flexibility to meet need and economic conditions.

***National Designations (para 141)***

- National Parks are recognised beside National Scenic Areas, Sites of Special Scientific Interest and National Nature Reserves as National Designations, with a corresponding policy test as set out in paragraph 4 above. Both National Park Authorities welcome this recognition.

***Onshore Wind (paras 216-219)***

- The draft SPP sets out a spatial strategy where National Parks and National Scenic Areas sit at the top of a 4-tier hierarchy and where wind farm development will not be acceptable. Both National Park Authorities welcome this recognition. However, we both also want a clearer reference to the need to protect National Parks from the effects of windfarm development outside our boundaries where they have a negative impact on a National Park's special landscape qualities.

***Other issues common to both National Park Authorities***

- Both National Parks have villages that are probably not considered towns in national terms yet play an important role in the communities and local economy. The sections of the draft SPP on Town Centres refer to town centre health checks and town centre strategies. Although these are probably not relevant to our settlements, is there a proportionate way of applying the principles to rural settlements?
- NPF3 identifies National Scenic Routes as important for the tourism economy. In the draft SPP they are identified as areas with opportunities for onshore wind developments (Group 3 of the 4 group hierarchy). This seems at odds with NPF3 and with showcasing the scenic beauty of Scotland.
- The draft SPP could provide more guidance on how to proactively plan for tourism in rural areas in recognition of its role and contribution towards sustaining the rural economy. The SPP could advocate a plan-led approach to tourism and link directly to NPF3 which requires that planning authorities support the National Tourism Development Strategy.

**Next steps**

19. Following the planning committee discussion we intend to continue to develop our response with colleagues at LLTNPA before submitting prior to the consultation deadline of 23 July. We hope to have further discussion as both National Park Authorities with Scottish Government planners and will be taking part in Scottish Natural Heritage's consultation on long distance routes for NPF3. We will ask the Planning Committee Convener and Vice Convener to sign off the CNPA's detailed response in July.

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June 2013**