

CAIRNGORMS NATIONAL PARK AUTHORITY

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

Prepared by: Denis Munro

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 Committee forward this report, with agreed amendments and additions, to the Scottish Executive as the CNPA's response to the consultation document.

Executive Summary:

Scottish Planning Policies (SPPs) and the National Planning Policy Guidelines (NPPGs) which they are replacing apply across the whole of the country and give planning policy guidance on important land use and other planning matters. They are material considerations to be taken into account in development plan preparation and development control. It is normal for this guidance to be issued firstly in a draft form for public consultation and subsequently in a final, "official" version. The draft document is attached, in full, to this report.

The central propositions are:

- The countryside should be able to absorb more people content to live and able to work there
- The planning system can assist this by adopting a more welcoming stance to development in rural Scotland including the further refinement of the approach to diversification.

Rural Scotland is defined as comprising the countryside and settlements of 3000 or less. Some of the detailed measures proposed are linked to "rural Scotland", some to "the countryside" and others are not clearly linked to either. Broadly, the guidance encourages greater provision being made for development in rural areas and/or the countryside. The types of development envisaged include housing, working from home, tourism projects,

aquaculture, equestrianism and a range of other activities which might fall under the heading of “diversification”. These proposals are subject to the important caveat that development locations must be “sustainable” although some of the development types proposed - particularly housing in the countryside unrelated to local economic activity - might, by the standards of other existing guidance, be judged to be inherently “unsustainable” in the sense that they encourage greater use of the private car for trips related to work, services and social activities.

Appraisal

1. The response to the consultation could take many forms depending on the extent to which one shares the vision of the countryside in the National Park being an appropriate location for the diverse activities referred to in the document. I am conscious, in particular, that our response will have to anticipate the views which members will eventually express in our local plan about the most appropriate balance in the choice of development locations. The following comments are therefore provisional suggestions which will be revised to reflect the Committee’s attitude after consideration of the draft SPP.
2. The SPP’s main theme is to encourage a wider range of activities and a greater number of people to be located in the countryside. To serve that objective it advances a wide range of recommendations which, either, alter the emphasis of current policies or create opportunities for development in rural areas which, under current policy, there would be a presumption against.

The Planning Vision and SPP Objectives (paragraphs 4 - 8)

3. The CNPA would prefer that the commitment to accommodating more people and employment be expressed in terms of “rural areas” rather than “the countryside”. Within the National Park it is envisaged that most of the opportunities referred to will be directed to settlements which would be consistent with the definition of rural areas contained in paragraph 1.
4. The CNPA welcomes the proposition in paragraph 7 that most development would be plan-led and that the overall objectives and principles can be tailored to suit the special context of the National Parks. Local Plans, prepared in consultation with the community and other interest groups, are the best mechanism for translating these principles into a local context.

The Role of Planning (paragraph 9)

5. The CNPA supports the principle of creating rural diversification, development opportunities in sustainable locations and the proposition that “new development must be carefully planned if the character and quality of the countryside is not to be undermined.” The effect of other existing guidance on sustainable locations tends to

mitigate against the countryside for residential and commercial development. For example, Planning Advice Note 57, Transport and Planning states in paragraph 5: "The proposed development location should be assessed in terms of both the potential and likely accessibility for people and freight by all modes. The aim is to determine whether the location has the potential to minimise travel, particularly by the private car." Similarly, the draft SPP 17, Planning for Transport, states in paragraph 35, "Planning permission should not normally be granted for significant travel generating uses in locations where links to walking, cycling and public transport networks are inadequate, which would encourage reliance on the private car..." That philosophy does not sit very comfortably with many of the provisions of this guidance - for example paragraph 12: "the private car has increased the ease of access to rural areas and has influenced choice of location for many people."

6. Sustainable objectives are, in general, best served if development in the countryside arises from a need, or opportunity, to help rural activities expand or diversify rather than to accommodate activities displaced from urban areas, or small settlements, by "demand".

New Development (paragraphs 10 & 11) and Diversification (paragraphs 15 - 17)

7. The CNPA, as stated above, considers that development locations need to be identified through local plans in consultation with local communities and other interest groups. The diversification ideas are interesting and the CNPA looks forward to receiving the Planning Advice Note on Rural Diversification referred to paragraph 38.

Economic Development (paragraphs 12 - 14)

8. The CNPA supports the principle of diversifying the rural economy by some of the measures listed. The loss of young adults and decline in the working population is, however, inextricably linked to the difficulty these groups experience in securing affordable housing. Initiatives to increase economic activity must be linked to complementary affordable housing initiatives and this link should be explicitly acknowledged in the paper.

Housing (paragraphs 18 - 24)

9. The CNPA is concerned that the draft guidance commends a very diverse range of housing categories without sufficient concern for the fact that in some cases these do not score well against sustainable objectives or have clear links with local needs.
10. The assertion in paragraph 22 that new housing in the remoter countryside "can help keep land prices down and allows a wider range of people to access the market" is highly questionable. The demand for this type of housing comes principally from those who wish to live in a countryside location (on a permanent or part time basis) and are prepared to travel considerable distances by private car to major settlements

for work and services. This, again does not conform with other guidance from the Scottish Executive on sustainability. In most cases, the owners of land receiving such consents will market them to the highest bidder and an exceedingly large number of such consents would need to be issued to have a depressing effect on land prices.

11. In a National Park context the pressure for holiday homes, second homes and general housing not related to local needs will have to be restrained in order to maintain an appropriate balance among the four Park aims and avoid the pitfall referred to in paragraph 7 of suburbanising the countryside. Priorities will be focussed on the provision of affordable housing - for which there is an urgent local need - and general housing for local people and incomers whose lives and employment are linked to the Park area. Meeting those needs will be extremely difficult if extra resources are not made available to Scottish Water to invest in up-grading sewage treatment works within the Park which are almost all operating at or close to their maximum capacity.
12. The references to affordable housing in terms of allocating sites for that purpose in development plans, obtaining subsidy from developers and drawing upon surplus Forestry Commission land are very helpful and the CNPA looks forward to receiving the good practice advice referred to on page 6.

Conclusion

13. In the context of the Cairngorms National Park, the draft SPP is “over-promotional” in relation to certain types of development in the countryside. With the exception of uses which can be justified in terms of agricultural diversification, tourism and industries whose principal resource is to be found in the countryside most businesses are best suited to, and are most sustainable in, settlements. The same is true of housing not related to a countryside-based economic activity or local need. National Parks have an uncommonly popular appeal for housing not related to local need and it is important, therefore, that those with responsibility for planning in these areas have the ability to formulate policies, in consultation with the local community, which exercise an appropriate degree of restraint over countryside-based activities consistent with the Park aims. It is important therefore for the final guidance to emphasise the “more welcoming stance to development in rural Scotland” advocated in paragraph 7 will be in a form, and to an extent, led by individual development plans.