

Date:			
Issue:	Policy 33 Tourism Development		
Objector(s):	Reidhaven Estate	Objection ref:	457
	The Crown Estate		419r
	Forest Holidays LLP		397
	Alvie and Dalraddy Estate		439y/z
	Mrs Jane Angus		437r

Reporter	Mrs Jill Moody
Procedure	Written Representation

1.0 Overview

- 1.1 This statement sets out the CNPA response to the objections raised to the Deposit Local Plan, as modified, in respect of Policy 33 Tourism Development and supplements the response made to those objections by the CNPA in its report to Committee (CD7.3, 4 and 5). It recommends no further modification is made to the Plan in respect of this policy.

2.0 Provision of the Local Plan

- 2.1 Policy 33 Tourism Development supports the development of tourism-related facilities/attractions, where they enhance the range and quality of provision, and/or lengthen the tourist season, have a beneficial impact on the local economy and do not have any adverse impact on the special qualities of the National Park.
- 2.2 All proposals should contribute to the development and protection of sustainable communities and maintain and enhance the quality of the visitor's experience. Any proposal which would reduce the tourist facilities of an area will be resisted unless it can be demonstrated to the satisfaction of the planning authority that the effects will not have an adverse impact on the sustainability of the surrounding community.
- 2.3 The policy reflects the importance placed on tourism, recognised as one of the key economic drivers within the National Park. The creation, maintenance and promotion of a healthy tourism industry are vital to the area, its communities, and also to achieving the aims of the Park. The key to the success of sustainable tourism within the Park is the ability to deliver a high quality experience in an increasingly competitive global market, whilst maintaining the special qualities of the area. The policy encourages tourism developments which relate to these special qualities, maintain and enhance the range and quality of visitor attractions and facilities, attracts more visitors to the area, encourages them to stay longer, and meets their needs and aspirations.
- 2.4 The Policy and background text have been modified in the 1st modifications of the Deposit Local Plan with additional and altered wording, to include reference to supporting facilities, omit the requirement for justification based on specific industry standards and makes mention of where a reduction in current provision is satisfactory.

3.0 Summary of objection(s)

- 3.1 The 5 objections to Policy 33 cover the following issues:
- The plan should be amended to make provision for a tourist information and national park interpretative facility as supported within the Park Plan. The plan does not contain a policy in

support of the A9 nor Blackmount site; they should therefore be specifically cited as a Proposal. It is also suggested that the importance of the A9 as key tourist artery, and of Blackmount as the northern gateway to the Park warrants specific mention.**457**

- The wording should be more supportive of tourism development and amended to include 'significantly' before 'adverse environmental or landscape impacts'.**419r**
- There should be greater emphasis and recognition on supporting good quality and varied tourist accommodation. The Plan should recognise the important role of such accommodation on the tourism industry as a whole. The Plan should also provide support to allow existing tourist accommodation providers to expand and diversify where appropriate. The policy should be amended or an additional policy added to give clear support for the provision of tourist accommodation and to recognise its importance within the tourism industry and the economy as a whole. Support should be given to allow existing operators to expand and diversify the range of accommodation provided, to suit changes in market trends, in instances where such can be accommodated within detriment to the aims and objectives of the National Park.**397**
- There should be a greater range of economic activities supported in the National Park in addition to tourism. **439y/z**
- The growth in tourism will need to be carefully managed to ensure it does not result in disturbance for wildlife. **437r**

4.0 Summary of Cairngorms National Park Authority Response

- 4.1 The broad aims of the policy are the promotion, protection and enhancement of tourism-related facilities; it is considered that sufficient scope is provided to assess proposals, positively and flexibly, encouraging tourist development. The policy has been worded to give positive support to tourism developments recognising the benefits to the local economy and communities, particularly where they enhance the range of facilities provided. The modifications have endeavoured to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The creation of a world class National Park is key to the vision of the National Park and is stated throughout both the National Park Plan and Local Plan.
- 4.2 It is considered that the policy as worded is suitable in that it provides clarity, appropriate levels of guidance and reflects the importance placed upon tourism within the National Park. No further modifications are therefore proposed.

5.0 CNPA Recommendation

- 5.1 The CNPA recommend to the Reporter that the objections to the issues are rejected. The policy is intended to positively guide proposals for tourism-related development, realising the need for sustainable tourism and the protection of the special qualities of the area but which recognises the economic importance of tourism to the Park, its communities and at a national level. The policy is worded appropriately for the protection and enhancement of tourism-related facilities; it is considered that sufficient scope is provided to assess proposals, positively and flexibly, encouraging tourist development. No modification is therefore proposed.

6.0 Assessment / Scope of Evidence

- 6.1 **457** The existing Badenoch and Strathspey Local Plan identifies the site at Blackmount, north of the A9 Carrbridge junction as being a key gateway information site for promoting bypassed communities and alternative tourist routes etc (para 2.2.11). SPP 17 allows planning authorities

through their development plans the option to approve roadside facilities subject to design issues. The site offers an ideal opportunity to combine a commercial development with a tourist facility. The draft policy should refer specifically to Blackmount and include provision for commercial refreshment facilities

- 6.2 **Response:** The broad aims of the policy are the promotion, protection and enhancement of tourism-related facilities; it is considered that sufficient scope is provided to assess proposals, positively and flexibly, encouraging tourist development. The modifications have endeavoured to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording of policy 33 would therefore support appropriately sited and designed development. The approach taken in the proposals maps has also been reviewed to ensure appropriate levels of clarity and guidance are included.
- 6.3 The policies of the Local Plan are not meant to be site-specific but provide a clear, consistent development framework to guide individual planning applications. Proposals such as this will be considered on their merits, and judged against all policies in the Plan. The site has not been specifically identified, as the Plan does not wish to hamper the selection of a site for any such development. The wording of the policy is therefore considered suitably supportive to assist in the development of the project if it comes forward. No further modifications are therefore proposed.
- 6.4 **419r** This policy should be more welcoming towards tourism development as this is an essential part of the economy of this area. Modifications to resolve this objection - The word “significant” should be inserted before “adverse environmental or landscape impacts”.
- 6.5 **Response:** It is considered that the issues raised are partly addressed above. The wording used within this policy has been reworded and clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. Paragraph 1 has been reworded to be more supportive for developments. The introduction to section 6 has been amended to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park. The policy has been partly amended to give more positive support to tourism developments. No further modifications are therefore proposed.
- 6.6 **397** Greater emphasis and recognition should be placed upon supporting the provision of a good quality and a varied range of tourist accommodation. The Local Plan should also recognise the fundamental importance that the appropriate provision of tourist accommodation can have upon the tourism industry as a whole within the National Park. The Local Plan should also provide support to allow existing tourist accommodation providers to expand and diversify where appropriate.
- 6.7 **Response:** It is considered that the issues raised are suitably addressed above. The introduction to section 6 has been amended to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park. The policy has been partly amended to give more positive support to tourism developments. The Plan specifically states that a *‘good range and quality of tourist facilities and accommodation is vital to a healthy tourist industry.’* No further modifications are therefore proposed.
- 6.8 **439y/z** The economy within the Cairngorms National Park is already dangerously over dominated by tourism. If there is a significant down turn in tourism the Park could face a serious

recession. The National Park economy would benefit from having a more diversified economy. Paragraph 6:13 should be deleted.

6.9 **Response:** The modifications have endeavoured to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. Sufficient scope is available to consider proposals for a change of use away from tourism-related business. The policy is to support tourism and the wording should not undermine the underlying aim of the policy. The paragraph is intended to offer some protection to what is a recognised key employment provider within the National Park and is intended to provide an appropriate level of guidance for users of the policy. The CNPA recognise the paramount importance of rural diversity to the Park's economy, the promotion of sustainable economic and social development is the 4th aim of the National Park and is reflected in other Local Plan policies such as policy 27 Business Development. No modifications are therefore proposed.

6.10 **437r** Policy 33, 6, 5-9, p 56. 6.5-8 I agree that everyone should be welcoming and the policies included, but this will require education in 'responsibility' and map-reading, courtesy in driving, reduction in litter, local buying and quietness in enjoyment if others and wild-life are not disturbed. It might be wise to recognize limits of disturbance before too late.

6.11 **Response:** The policy expects all tourism development to make a contribute to the vision of a world-class tourist destination, promoting a sustainable approach to developing tourism, with significantly enhanced awareness and understanding of the National Park, its special qualities and management needs. The impact of development on natural heritage, visitor experience and appropriate facilities will be considered under various the policies of the plan. The Plan recognises the need to protect the Park's special qualities and promote responsible behaviour, through the requirement for development to be consistent with the Scottish Outdoor Access Code and the CNPA Core Paths Plan and Outdoor Access Strategy. The suggested comments regarding visitor experience and behaviour would not be considered appropriate for the Local Plan, as this would be difficult to implement through such a development framework. No modification is considered necessary as a result of this representation.

7.0 Strategic Issues

7.1 The National Park Plan 2007 provides a number of strategic objectives based around the enjoyment and understanding of the special qualities of the area; including raising awareness of the Park as a premier, year-round, rural tourism destination, developing a wide range of opportunities and improving and maintaining the quality of the experience for all visitors. The vision of the Cairngorms National Park is to develop a world-class destination which complements its outstanding environment and outdoor recreation opportunities and plays a part in the regional and national tourism economy. The National Park Plan identifies the fact that tourism accounts directly and indirectly for a significant part of the area's economy.

8.0 Other material considerations

- Scottish Outdoor Access Code

9.0 List of documents (including Core Documents)

- CD1.3 The National Parks (Scotland) Act 2000
- CD7.1 Cairngorms National Park Plan 2007
- CD7.3 CNPA Committee Report Deposit Local Plan May 2007

- CD7.4 CNPA Committee Report 1st Modifications October 2008
- CD7.5 CNPA Committee Report 2nd Modifications February 2009
- CD8.6 Scottish Outdoor Access Code
- CD7.13 Cairngorms Sustainable Tourism Strategy
- CD7.11 Outdoor Access Strategy