

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Cairngorms National Park Authority

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?

Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

No comment

2. How should we provide spatial guidance for onshore wind?

Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government's proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

Is spatial guidance for onshore wind best left to local authorities?

The CNPA welcomes the recognition in the NPF3 Main Issues Report of National Parks and National Scenic Areas as Scotland finest landscapes. We also support the approach in the draft Scottish Planning Policy to protecting National Parks and National Scenic Areas from wind farms and our response to the SPP suggests changes to improve its clarity and avoid confusion. We do not seek buffer zones around National Parks but in our response to the Draft SPP we propose additional guidance to protect their special landscape qualities from wind farm development outside their boundaries.

Scottish Natural Heritage's wild land mapping provides a consistent way of identifying areas of land with a wild land character and the CNPA considers this to be a relevant factor in determining wind farm proposals outside the National Park.

We suggest that spatial guidance for onshore wind should be left to planning authorities (ie Local Authorities and National Park Authorities) in consultation with neighbouring planning authorities and SNH. National Park authorities will provide spatial guidance for small scale wind power developments within their boundaries,. However, there will be places in their landscape setting, outside their boundaries, where wind farm development could affect the integrity of the designations or their special landscape qualities. Any such effects would be important factors in determining wind farm proposals and should be highlighted to developers through the appropriate spatial strategies.

3. How can onshore planning best support aspirations for offshore renewable energy?

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

No comment

4. How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

No comment

5. What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?

No comment

6. Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

No comment

A NATURAL PLACE TO INVEST

7. Can NPF3 do more to support sustainable use of our environmental assets?

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Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

The CNPA supports the policy protection for agricultural land, woodland and peat that the draft SPP provides, and suggests that NPF3 could refer to the National Land Use Strategy more explicitly and highlight national opportunities to expand woodland, restore peatlands and habitats such as flood plains.

The CNPA would support the the development of a National Ecological Network and would expect National Parks to play an important part in identifying and delivering it through their National Park Partnership Plans. Defining and developing such a network would be a substantial task and we suggest that the Government start work on it now with a view to it being a firm proposal once the fourth National Planning Planning Framework is prepared. We also suggest that work starts now on how to better integrate the National Land Use Strategy in NPF4. We suggest that National Park Partnership Plans would provide good way of planning for and delivering management of parts of such a network in National Parks.

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

The National Ecological Network proposal suggested above could, if implemented, provide the basis for identifying strategic environmental enhancement opportunities. Other plans such as National Park Partnership Plans, or in the Cairngorms, the Cairngorms Nature Plan could provide regionally targetted priorities.

Environmental enhancement or mitigation on a significant scale is likely to be costly. It is unlikely that individual developments will provide enough to secure ambitious targets or significant change. We therefore suggest that the Government establish a fund to deliver nationally strategic environmental enhancements or mitigation . We consider that such a fund would have a substantial impact on the delivery of environmental objectives and help secure future development that would otherwise not be possible.

In general terms we consider that the NPF3 could do more to link across and between land use priorities and make much stronger links to the National Land Use Strategy.

9. Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

The CNPA supports the identification of National Parks as national tourism assets. We consider that National Parks should provide a particularly strong focus as places for the development of sustainable tourism. The Cairngorms National Park already attracts at least 1.4 million visitors a year and is a significant year-round destination which has twice been awarded the European Charter for Sustainable Tourism. We would also like to highlight the Glenmore area, between Aviemore and Cairngorm, has one of Scotland's most significant destinations as well as one of its most sensitive environments. The area is designated for Natura 2000 interests and successfully balances nature conservation with visitor management. By highlighting such areas the National Planning Framework can help reinforce the need for collaboration between private, public and third sectors and also for investment in infrastructure to maintain high quality visitor experiences.

The CNPA supports the identification of a network of long distance routes such as the Speyside Way and Deeside Way as a National Development. We have proposed a selection of routes for inclusion via our discussions with Scottish Natural Heritage and partner organisations.

We suggest that NPF3 also highlights the importance of core paths and core paths plans in supporting long distance routes and local visitor experiences and economies.

10. Can NPF3 do more to support sustainable resource management?

Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

No comment

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

The CNPA supports a strategy that unlocks the potential of remote and fragile rural areas. We are actively involved in promoting rural development. However, we point out that areas such as National Parks have particular pressures on their housing markets due to in-migration by richer and older people, second homes and a low-paid workforce and this contributes to significant housing affordability issues. The National Planning Framework should be modified to help build the case for increased investment in rural housing for the workforce in such areas.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

No comment

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

The Cairngorms National Park is one of the most sensitive locations in Scotland for new development because of its outstanding natural heritage. Nearly half of the Park's area is designated as European protected sites and more than half the area covered by national nature conservation designations. Much of the remaining area is connected to these sites by habitats or protected species.

At the same time, the Cairngorms National Park faces particular problems in relation to meeting housing need and demand. The National Park has strong demand for housing from relatively well-off retirees and second home owners that maintains house prices above the level of most household wages in the Park. This means there is a particular need for affordable housing for much of the working population of the Park.

NPF3 presents Government with an opportunity to set out a long-term spatial strategy for future housing supply across Scotland, taking account of environmental constraints and sensitive locations as well as where the most resource efficient locations will be. We consider that this would allow planning authorities to make best use of what are constrained resources for housing land and would not limit development. We consider that this would support National Parks and other sensitive parts of rural Scotland.

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

The CNPA recommend that NPF3 highlights the particularly critical importance of next generation broadband to rural and remote communities.

The CNPA supports the ambition to increase walking and cycling as an everyday activity and suggest that NPF3 is modified to highlight the importance of Core Paths Planning as a process to protect and plan strategically for the paths resources close to, and between, communities.

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

The CNPA supports the accelerated roll out of high speed broadband to rural communities. We suggest that NPF3 highlights rural Scotland as the priority for public investment in future digital technologies. We also suggest that the need for infrastructure to support effective mobile communications is a

critical issue for rural Scotland. A carefully planned approach to such infrastructure is vital in remote rural Scotland and areas valued for their landscapes such as National Parks.

The CNPA supports the proposal in the NPF3 Main Issues Report for development and promotion of national scenic corridors such as the A9. We also suggest the inclusion of existing signposted tourist routes, including the Highland Tourist Route from Aberdeen to Inverness.

We also support the suggested Scottish Tourist Routes Project and look forwards to implementing a number of roadside viewing platforms and enhanced view points in the Cairngorms National Park.

16. How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?

Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

The CNPA suggests that the critical issues for rural Scotland are considered under Q15 above, with rural broadband and mobile upgrades of particular importance.

We point out that Inverness and Aberdeen also play important roles for the Cairngorms National Park as hubs for visitors to the Park and large parts of highland Scotland.

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Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?
2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?
3. Taking into account the environmental effects set out in the report, what are your views on:
 - a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
 - b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
 - c) The proposed suite of national developments to be included in the Proposed Framework?
 - d) Alternative candidate national developments?
 - e) The policies proposed for the Draft SPP?
 - f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?

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5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?
6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

No comment

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

No comment

Business and Regulatory Impact Assessment (BRIA)

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In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

No comment