

Scottish Government Consultation on National Planning Framework for Scotland 2

Response of Cairngorms National Park Authority 153

Please accept this as the response of the Cairngorms National Park Authority (CNPA) to this consultation.

The CNPA welcomes the opportunity to respond to the consultation on NPF2 and supports the need for a long term strategy for Scotland's spatial development.

As a National Designation it is considered that the Cairngorms National Park constitutes a vital element of the nation's environmental capital and the opportunity should be taken via NPF2 to not only to ensure its conservation and enhancement as an environmental resource to be enjoyed by all, but also to highlight its potential in the Scottish context to pilot innovative and exciting solutions for a variety of sustainable development projects, contributing to the promotion of sustainable communities and also the potential role of the National Park in monitoring climate change. We would direct you to the adopted Cairngorms National Park Plan which provides appropriate context.

It would be useful to say something about the process involved in determining priorities when there is a conflict between the need to provide/sustain the nation's physical infrastructure and environmental capital e.g. large infrastructure projects in a National Park.

Particular comments are as follows:

Map 4 House Price to Income Ratio. The scale of the map and broad brush approach renders the data meaningless and it is suggested that recent activity in the housing market means that its accuracy is further diminished. It certainly does not reflect the situation in the Park.

Paragraph 132 Small scale, community based renewable projects have a role within Cairngorms National Park and we will be bringing forward guidance in the near future.

Paragraph 141 Scotland 2030. It is considered that Cairngorms National Park can play a role in delivering the key aims for the strategy for Scotland's spatial development to 2030.

Paragraphs 228 and 229 and Map 18 of NPF2 deal with energy transmission and grid upgrade. It is stated that no assumption has been made about the need or route for Beaully – Denny, whilst at the same time saying it is required. Map 18 clearly shows a straight route between the two points. It should be made clear that there are various potential alternative routes either overland or subsea. Interestingly Map 20 National Designations shows grid reinforcements not routed through the Park.

Paragraph 273 of NPF2 makes reference to renewable energy in the Highlands and Islands. CNPA fully supports renewable energy proposals that are of a scale compatible with the Park's character and status and we will be producing detailed guidance in due course. CNPA is not supportive of large scale windfarms within the Park and has objected on a number of occasions to such proposals that affect the setting of the Park. This section does have reference to Highland Council's renewable energy strategy identifying the Monadhliaths as a preferred area for major windfarms. CNPA made representations on this document and does not support this designation as a preferred area.

Paragraph 281 of NPF2 makes reference to a variety of environmental projects/resources in the Highlands and islands and it is suggested that there should be some specific references to the Cairngorms national Park e.g. it covers 5% of Scotland, 25% designated as being of European importance for nature conservation, home to 25% of the UK's rare and threatened species etc.

Paragraph 299. It is suggested that Cairngorms National Park has a role to play in several elements of the action programme, particularly sustainable communities, habitat networks and decentralised energy production.

We would ask that you take these comments into account and we are only too happy to discuss or offer clarification if required.

Don McKee
Head of Planning
Cairngorms National Park Authority
14 April 2008