

Badenoch & Strathspey Conservation Group

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The district of Badenoch & Strathspey lies almost entirely within the Cairngorms National Park and some of our comments refer specifically to Scotland's National Parks, reflecting their particular status. However, our other comments are of a more general application. Please do not hesitate to get in touch if further information would be helpful.

Kind regards

Dr Gus Jones
Convener

NATIONAL PLANNING FRAMEWORK 4 - SUBMISSION TO CALL FOR IDEAS

1. What development will we need to address climate change?

New development needs to be zero carbon, energy efficient (e.g. Passivhaus standards), use climate-friendly materials, minimise use of concrete and be rigorously future-proofed. Social housing in Norwich already achieves some of these targets.

There should be no development of unconventional oil and gas, new fossil fuel developments nor large biomass plants.

We need peatland restoration, the cessation of peat extraction for horticultural use and restoration of extraction sites. We need to avoid development on peat and peaty soils.

We need to promote non-flying public transport; and design out the promotion of private car use.

We need to focus development in existing settlements and where climate impacts are likely to be lowest.

We need to focus on nature-based solutions to climate change challenges. These include expansion of woodlands; improving the carbon sequestration of agricultural soils; and reducing climate unfriendly land uses that minimise carbon sequestration.

2. How can planning best support our quality of life, health and wellbeing in the future?

It needs to be recognised in NPF4 that the land supply is finite and therefore there is a finite limit to the growth of settlements. At some point we have to decide enough is enough. As one example of a step in this direction, it would help if settlement boundaries were long-lived, rather than expanded with every new Local Development Plan.

National Parks need to be treated differently from elsewhere in terms of development. NPs are designated for the nation for their outstanding environment. The exceptionally high-quality environment of NPs has a special role to play in promoting quality of life, health and well-being for the nation.

National Parks need their own approach to housing. Here new housing should be focussed on meeting local need; should be targeted at people with a reason for living in the NP, such as family, work, etc; and with a focus on people who are not in a position to buy or rent on the open market. Planning decisions in National Parks need to deliver on the 1st aim of our National Parks (To conserve and enhance natural and cultural heritage). At present housing development in the Cairngorms National Park is frequently at the expense of the special features of the National Park. This does not accord with the 1st aim and is degrading the very qualities that the NP was designated for.

The widely recognised problem of so-called 'affordable' housing not being affordable urgently needs to be addressed. This is very much felt in the Cairngorms NP where house prices are particularly high.

In the Cairngorms National Park the model of providing affordable housing 'on the back of' open market housing frequently shows itself to be unsustainable. The exceptional quality of the natural environment means that built development often has significant negative impacts on the special features of the Park, including such fundamental ones as biodiversity and landscape.

NPF4 should rule out new settlements in National Parks. New settlements within National Parks are profoundly unsustainable and inappropriate due to the critical value of these areas for natural heritage. The high demand from out with the National Park for housing can drive demand for new settlements. The proposed new settlement of An Camas Mor in the Cairngorms NP is identified by the Park Authority as commercially non-viable. It would be extremely destructive of biodiversity and of the exceptional landscape qualities of the National Scenic Area that the site is within; it would severely impact the quality of experience of the locality; and it would require restrictions on access to the most popular Caledonian woodlands of the Cairngorms due to impacts of thousands more people living and recreating so close to the most important forests for capercaillie. These forests are vital to the survival in Scotland of this important and economically significant bird.

NPF4 needs to address the problem of shared equity housing becoming open market housing at the 2nd sale, which results in continuing, unsustainable demand for new shared equity housing to be built.

Social rented housing can be provided that specifically enables older or disabled people to live within their community in good quality housing that appropriately meets their needs and can cater for a range of levels of independence (e.g. enables overnight care). Such housing needs to be administered so that it remains available in the long term for this specific use and is not sold into an open market, either rented or for purchase.

3. What does planning need to do to enable development and investment in our economy to benefit everyone?

The inherent inequality between the rights of developers and the lack of equal rights of communities militates against planning benefitting everyone.

NPF4 needs to address this, albeit within the context provided by the new Planning Act.

It would help if there were full transparency throughout the planning process, excellent access to information, and a clear understanding of how and why and by whom decisions are made. Planning meetings should be live streamed and videos available for reasonable time periods after meetings. Planning case documents should be readily available to the public for reasonable lengths of time.

NPF4 needs to address the problems associated with consents that can remain without being reviewed over many years. Planning conditions identified years previously do not take account of new material considerations including major environmental changes, such as the declared climate

and ecological emergency; improved knowledge of natural heritage; improved understanding of the significant decline of an impacted species, and so on.

We must develop a circular economy with the re-use of resources given due emphasis at the top of the waste hierarchy.

Development needs to be designed to be adaptable and long-lived, with materials that can be re-used, rather than added to our waste problem.

NPF4 needs to ensure that environmentally friendly materials are chosen, e.g. by avoiding the use of plastics. Pollution from micro-plastics is global and ecosystem health can be profoundly impacted by plastic in their environment.

Materials need to be chosen so that their cradle to grave impacts and carbon footprint are minimised.

NPF4 needs to ensure that Scotland can live within our planetary boundary so that we use no more than our global fair share of the single planet earth we all depend on.

4. How can planning improve protect and strengthen the special character of our places?

The planning system and the legal system are failing to ensure protection of Scotland's designated sites (e.g. the impacts of Trump's Menie Links golf course on the Foveran Links SSSI in Aberdeenshire, that has necessitated de-designation).

We experience such loss of natural capital in the Cairngorms National Park which is of high importance for biodiversity, but where important biodiversity is being fast lost to development.

Designated Sites - Maintaining the biodiversity of our designated sites is needed for Scotland to deliver on high level targets (such as Aichi).

National Parks play an important role in enabling Scotland to deliver on targets to halt biodiversity loss. Such outcomes cannot be achieved by the continuing attrition of habitats within our National Parks through built development.

Undesignated Sites – It is understood that undesignated sites play a vital role in sustaining Scotland's rich natural heritage and biodiversity. The planning system needs to include a means of identifying and protecting undesignated sites of high importance for Scotland's natural heritage, for example lochs, rivers, wetlands and carbon-rich soils.

NPF4 should introduce second tier sites across Scotland.

Long-established habitats - Better recognition and protection is needed for important long-established habitats, such as ancient woodland, veteran trees and long-established flower-and fungi-rich meadows.

Habitat connectivity – NPF4 needs to ensure connectivity of habitats for wildlife through the establishment of a Nature Network for Scotland, that would benefit resilience. This needs to be embedded in the planning system, along with other 'connecting' strategies (such as B-Lines).

Buffer Zones - Important sites (both undesignated and designated) need to have a buffer zone between them and development. The significant negative impacts of development on the immediately adjacent land 'over the fence' is well established (for example, for impacts on ancient woodland sites see <https://www.woodlandtrust.org.uk/media/43619/impacts-of-nearby-development-on-the-ecology-of-ancient-woodland-addendum.pdf>).

Strategies – NPF4 needs to give better recognition to strategies such as the Pollinator Strategy for Scotland, so that they are firmly and effectively embedded in the planning system and able to deliver meaningful benefits.

At Local Plan stage there needs to be greater investment in establishing where important sites are, and what the qualities are of sites proposed for allocations. For example, more site-specific information is often needed than a Phase 1 survey provides, for example in ‘important areas’ (<https://www.buglife.org.uk/resources/important-invertebrate-areas/> and <https://www.plantlife.org.uk/international/important-plant-areas-international>).

5. What infrastructure do we need to plan and build to realise our long term aspirations?

We need to develop a circular economy, and substantially improve the infrastructure dealing with our waste.

We need to develop infrastructure to re-use and recycle the materials we use closer to home.

We need to build waste water treatment works that use nature-based solutions such as reed beds.

We need sustainable municipal composting infrastructure for all kitchen and garden waste.

NPF4 needs to promote green and blue connectivity to reduce the barriers to wildlife movement and gene flow created by major transport infrastructure, and reduce wildlife RTA mortality and collision risks for people.

Other ‘high level outcomes’

Increasing the population of rural areas of Scotland

NPF4 needs to ensure that accurate and up to date information is provided on population changes. The most recent census shows that from 2001-2011 the population of Badenoch & Strathspey grew by 16.4% and the average increase in Highland overall was 11.1%. These increases are both substantially above the population increase for Scotland as a whole of 5% over the same census period. There is still a view held that these rural areas are vulnerable to population decline, which is not borne out by the evidence.

NPF4 needs to establish climate-friendly, zero-carbon and future-proofed development. The idea of repopulating the glens with new builds is likely to raise carbon outputs, with the introduction of new roads, new services, new infrastructure, frequent journeys in private cars, etc. In addition there are likely to be negative impacts on biodiversity and landscape, and potentially on remoter areas such as Wild Land Areas.