



Scottish Council for National Parks

Response by the Scottish Council for National Parks to Scottish Planning Policy SPP 11 Physical Activity and Open Space: Consultation Draft.

Preface

The Scottish Council for National Parks (SCNP) was formed originally in 1943 and operated until 1967, when it was stood down as a result of the setting up of the Countryside Commission for Scotland. It was reconstituted in 1990 following the publication of the CCS's report on the 'Mountain Areas of Scotland' for Government, which recommended the creation of National Parks in Scotland. The SCNP's primary aim is to promote the protection, enhancement and enjoyment of nationally outstanding areas that are National Parks, or are appropriate to be designated as such, or are of sufficient merit to warrant special protection. This is manifest in our support for good stewardship of the country's best environmental assets and encouragement of sustainable methods of development, particularly within areas of national park potential. SCNP is a recognised Scottish Charity.

Introduction

SCNP is pleased to respond to the Scottish Executive's consultation on the draft *SPP 11: Physical Activity and Open Space*. SCNP supports the Scottish Executive's efforts to encourage a healthier lifestyle and secure proper standards of open space but is confining this response to those aspects of the draft that have particular relevance to our concerns over the threatened industrialisation by windfarm development of some of our most important recreational assets and the consequent loss of access rights over substantial areas.

Para 56

We welcome the statement that Regional Parks, Country Parks, local nature reserves etc should be safeguarded through development plans. In this respect, we consider that there is an apparent inconsistency with the current draft of SPP 6 Renewable Energy, which affords no protection for Regional Parks in the development plan processes mentioned in that SPP. **We consider this to be a serious omission and urge that SPP 6 is brought into line with SPP 11.**

CORE PATH PLANS AND ACCESS RIGHTS

Para 57, 58, 59

We support all the provisions in these paragraphs. It is important that local authorities are given adequate resources to ensure that these provisions can be effectively provided

within reasonable time scales. With reference to para.59, we particularly welcome the guidance that access rights are a material consideration in determining applications for planning consent and that local authorities have a duty to uphold access rights over all land and inland water, not just paths. This has particular relevance to Regional Parks and potential Regional Parks which are threatened with irreversible damage from windfarm proposals. **In the Clyde Muirshiel Regional Park windfarm proposals threaten to exclude the public from up to 25% of the Park's 108 square miles.**

IMPLEMENTATION

The role of Local Authorities

Para.64

We strongly support this paragraph and particularly welcome the emphasis on resisting the loss of existing resources and safeguarding biodiversity.

DEVELOPERS'RESPONSIBILITIES

It would be better and stronger to say that developers should abide by this policy rather than take account of it. Developers are skilled at putting forward reasons why a policy should not apply and the greater the clarity in SPPs, the better.

CONCLUSIONS

We welcome Scottish Ministers strong commitment to the protection and enhancement of open space in and around towns and cities. Regional Parks were designated not only because of the quality of their landscapes and sensitivity of their habitats but also because of their accessibility to substantial populations in the major conurbations many of whom did not always have the opportunity to benefit from access to open country. Now that access has been achieved, it would be unforgivable to lose it.