

NEMT comments on the National Park Partnership Plan 4 consultation

General

The document is too vague and lacks detail. The targets should be specific and measurable. At the end of the planning period, it will be very difficult to assess how much of the plan has been delivered.

The high priorities need to be clarified. For example, the climate emergency deserves emergency actions. Similarly, with biodiversity loss. There is a danger that the difficult actions required to deal with these issues will get lost in a smokescreen of well-intentioned, but easier, actions.

In some cases, the targets can't be too specific because they depend on legislation which has yet to be passed. It would be helpful if this was made clear.

Detailed comments

The comments below apply to the objectives and actions.

A1 – Getting to net zero by 2045 is a national target. Surely, the Park with its wealth of natural assets should be able to be an exemplar or leader and aim to get to net zero before the rest of the country?

Your own data shows that the average GHG emissions per capita in the Park is double the UK national average. Surely, this should feature in the plan with the necessary actions to, at least, bring the Park into line with the UK national average.

A2 – The target of 35,000 ha by 2045 is described as ambitious. This is less than 8% of the total park area. Given the climate emergency, this is unambitious in the context of both the large amount of ongoing natural regeneration, e.g. Cairngorms Connect, and woodland expansion targets for the whole of Scotland.

A3 – As above, this is unambitious. However, the peatland skills training programme is a good idea.

A4 – Reducing red deer densities to 5 – 8/km² is far too weak. While, we fully agree that the use of a deer density number is too simplistic and that we need to move to measures such as occupancy and browsing impact, we believe that this target deserves comment. It is an average figure across the Park, which includes conservation estates such as Abernethy, Glenfeshie and Mar Lodge and also grouse moors fenced to keep the deer out where deer densities are much lower. This target should be replaced by a maximum of 5 – 8/km² on any estate.

A5 – We fully support the need to reduce the intensity of game bird management in the Park but would like to see much more specific proposals. The word “Encourage” reveals that there are no firm plans in place.

A6 – We fully support the proposal to reduce muirburn. However, this is an example of the need to be clear that detailed plans are awaiting legislation.

A7 – A8 No comments

A9 – Restoration of the rivers in the Park is fully supported. However, this needs to be accompanied by some definitions of what this actually means. Planting a few trees doesn't mean that the river is restored.

There are still many km of moderate, poor and bad quality rivers in the park, much of which is due to physical modification. The plan should provide an annual and longer term target for restoration of these rivers.

A10 – A13 Restoring ecosystems is highly desirable, but the plan needs to be much more specific about what is intended. The Cairngorms Nature Index, referred to in A12, is a good example. At present, it is undefined and meaningless.

A14 – We note that wildlife crime, as an issue, is buried here. It needs to be a much higher profile issue. This gives the impression that things are OK and that progress is being made.

A15 – This sounds good. Leveraging in private investment looks good when the sums of money are displayed against public finance figures. However, many people already see through these sort of corporate greenwashing attempts. You need to be very sure that the carbon benefits are clear and real, that nature is benefitting and that the correct solution isn't to tackle the emissions at source rather than offsetting by growing trees.

A16 – A17 No comments

B1 – B13 – We agree that these objectives are all helpful but suggest that prioritising is important. These objectives cover a wide variety of issues, many of which are very difficult to measure and not all of which are equally important. Unless you prioritise, it will simply be a “wish list”.

C1 - We fully agree with this objective but note that it will be difficult to achieve. Specific plans need to be drawn up.

C2 – No comments

C3 – We fully agree that this is necessary. However, progress won't be possible without a more detailed plan. Solutions will potentially require significant public subsidy, which will probably not be available. Innovative thinking is required and getting this going requires a more detailed plan.

C4 – C6 – We agree.

C7 – No comments

C8 – C10 – Affordable housing is so important that it needs a higher profile. This is buried amidst footpaths and cultural experience. It needs to be prioritised. There is no indication of how the targets of less than 15% or 75% will be even approached, let alone, met. On the positive side, there is a clear target of 200 new affordable rental houses and the proposal to extend the greater than 25% affordable housing quota to other villages is very welcome. The Actions section refers to a Short Term Let Control Area. What is this and how will it work?

C11 – We agree.