

NORTH EAST MOUNTAIN TRUST COMMENTS ON CNPA PARTNERSHIP PLAN

Issue 1 Landscape Scale Conservation

1. Policy Context

- 1.1 The most relevant 'Big Steps for Nature' of the Scottish Biodiversity Strategy include Investment in Natural Capital. There appears to be no further thought given to this key Government strategy in the Plan. It should be mentioned here that the SBS has a specific working group on Landscape-Scale Conservation which brings together best practice and explores new means and mechanisms. We assume that the CNPA is represented on this working group?
- 1.2 The Cairngorms Nature Action Plan is highlighted as a key document. However, the four aims of the CNAP only broadly relate to landscape-scale conservation in relation to connectivity of habitat. Much of the CNAP is focused on priority species and habitat rather than wider ecosystem health, which is acknowledged as a problem in the SBS. The ambition of larger-scale conservation should be further elaborated for the Park, with examples given on how this might be achieved. The CNAP includes good large-scale targets for new native woodland, modest ambitions for peatland restoration (2000 ha, which is 0.44% of the CNP area), and reasonable targets for river restoration, but very weak and unambitious targets for new wetland creation. However, Wetlands are described under Rivers and Wetlands as small, fragmented and under a variety of pressures while supporting a great many species as well as providing natural flood management services. This implies that they require more ambitious targets.
- 1.6 It would have been informative to consider which of the 14 actions in the Scotland's Wild Deer: A National Approach (WDNA) are being applied within the Park to achieve a sustainable deer population in order to help deliver biodiversity objectives and the SBS target of restoration of 15% degraded habitats.
- 1.7 Natura 2000. The evidence presented shows that only 58% of SACs and 50% of SPAs within the National Park are in favourable condition against a national target of 80% by 2016. There is no specific analysis of the reasons why the targets have not been met, although that data is available from SNH. This is key information for stakeholders to understand what needs to be done to restore N2000 sites.

2. Other Drivers of Change

- 2.1 Protected Areas Review. The recommendations of the review that protected areas should be good examples of wider, healthily functioning landscapes resilient to change is quoted but not interpreted for the CNP. What does this mean for conservation management, and how this should change over the life of this Plan?
- 2.2 Climate Change Adaptation. Healthy ecosystems will indeed provide resilience to climate and other environmental change. It would be useful then to point out here that many of the Park's ecosystems, as indicated by the data presented, are not properly functioning and to

elaborate on the scale of this issue. Although climate change models indicate the probability of increasing autumn rainfall, they also indicate that summer precipitation may decrease, leading to degradation of peatlands and wetlands unless specific action is taken to reduce pressures such as over-grazing and moorland drainage.

- 2.3 Natural Capital misses the fundamental importance of investment in natural capital by all stakeholders, including land managers, to maximize public benefits, including recreational and cultural services. The Plan would benefit from describing how such investment might be encouraged and why it will be of benefit to service providers of these public goods.

The NPPP preamble states that the Plan will guide the work of partners to deliver the aims of the Park and show how the Park will contribute to the Scottish Government's core purpose and national outcomes. It would, therefore, have been useful to provide a summary of how all of this policy context is being applied to the National Park, for example, in relation to specific need for action as required by the policies.

3. Trends and Data

Woodlands. The scale of ambition to expand woodlands is admirable and fitting for the CNP, and the map of potential for further expansion is very informative. The statement that the most important limiting factor to this expansion relates to poor upland management through overgrazing requires some further analysis to indicate where this is a specific problem and what mitigation measures might be put in place.

The statement that SRDP changes have led to less sheep-grazing and thus more scrub and woodland regeneration is interesting but requires evidence and then further interpretation. What does this imply, if anything, for the management of the CNP and the Park Plan? Should the SRDP encourage even less sheep grazing, or even better, less deer grazing? What are the economic consequences of this?

The CNAP lists of species selected for targeted action form the bulk of conservation actions and are a necessary focus for priorities. However, there is no explicit indication of actions that deliver landscape-scale conservation, for example, in relation to wide-scale catchment management, or, other than for woodlands, how improved habitat connectivity is being delivered. This should apply particularly to wetland habitats which require considerable restoration of connectivity to floodplains and to functioning peatlands. The evidence presented show wetlands to be in a poor state in the Park, as elsewhere, but there is no indication of any particular focus on these.

Uplands. The restoration of peatlands is a welcome initiative, although the 2000ha target is only 0.44% of the CNP area and this ambition needs to be much stronger for a Plan going as far as 2022. Another view of this target is to compare it with the Scottish Government 2020 Vision for Biodiversity, which has a target to restore 15% of degraded habitat by 2020. Surely the CNP should be setting an exemplar target? Similarly, it appears very unambitious to have a target of only 25ha of wetland and Natural Flood Management restoration within the Park extent of 452,800 ha. The availability of SRDP and Water Environment Funding for

restoration begs the question of why so little of it is taken up with new restoration initiatives in the CNP.

It is disappointing that only 65% of designated upland features in the CNP are in favourable condition against a national average of 81.2%. The evidence presented on the causes of this is very loose and seems to implicate grouse shooting and land use intensification without actually making this clear. This issue requires more analysis and clear statement of facts along with potential mitigation and improved management measures.

Rivers and Wetlands. The condition of rivers and wetlands is better reported in the Flood Management Issues report and some of that evidence is missing from this section. Additionally, it is not clear why the Flood Management section reports water body condition up to 2013 but this Landscape Scale Conservation section reports these same statistics up until 2014. What that does reveal is that the number of “bad-status” waterbodies has doubled between these years (1.3 to 2.6%). The SEPA website shows that across both RBMPs in Scotland the proportion of river waterbodies at good or high status is 54%, so the CNP fares no better than the average condition, which is disappointing for a National Park. This is emphasized by the degradation highlighted in the report of over one fifth of waterbodies in the park in recent years and one sixth being in poor or bad status currently. It would be useful to indicate the causes of ecological status failures so that there is a clear view of the pressures that need to be addressed.

It is correctly reported that there has been an apparent recent, and very significant, decline in freshwater pearl mussels in the River Spey. The causes of this are as yet very uncertain (SEPA reports) and appear to be related to increases in sediment rather than to changes in water quality. This again points to the need to manage sediment inputs to rivers through appropriate land management practices which also potentially deliver NFM.

What We Want to Achieve. The stated ambitions are largely coherent and relevant to Landscape-Scale Conservation (unlike the stated aims of CNAP), and these are welcomed as clear statements of intent. They will, presumably, be turned into geographically specific targets – otherwise they will remain as ambitions.

4. Mechanisms

The CNAP aims require updating to better reflect the need for landscape-scale conservation in addition to actions for priority species conservation. We agree that spatial planning should be a key tool for supporting landscape-scale conservation management, and indicative maps of priority areas for improving connectivity are particularly useful. However, these should be provided for a wider set of indicative targets, for example, for wetland restoration.

There is an error in the note on River Basin Management Plans. They are not drawn up and overseen by Fisheries Boards and Trusts but by SEPA as the Competent Authority under the WEWS Act. Of course, measures under WFD and RBMP may be delivered by a variety of partners. We agree that Catchment Partnerships and catchment initiatives have proved very

successful at delivering biodiversity objectives, and these should be further encouraged and funded.

Key Questions

1. What more can be done to encourage woodland expansion and active woodland management in appropriate places?

A good starting point would be to use a land use model (e.g. from the James Hutton Institute) to identify potential for woodland expansion and the impacts/benefits of this at local/catchment scales. Land managers and communities should be encouraged to discuss scenarios for expanded woodlands and the social, economic and environmental impacts/benefits, and to agree most useful options. This process requires support from CNPA, FCS and other agencies. There should be a primary focus on encouraging naturally regenerating native woodlands in the core montane area. Woodland plantings elsewhere should be sensitive to roadside landscape views.

2. What are the best ways to support collaboration at a landscape scale?

The Scottish Biodiversity Strategy is supported by a Landscape-Scale Conservation working group whose aims include best-practice information exchange and innovation in landscape-scale conservation. We assume that the CNPA is an active participant in this working group? To deliver effective collaboration requires relevant partnerships of stakeholders (e.g. land managers, communities, regulators and planning authorities) supported by well-structured information (e.g. status of natural assets and ecosystem health, potential for restoration, prioritization process based on benefits realization). These partnerships may include catchment management initiatives and other appropriate coherent land management units. Key to success is access to the mechanisms for effecting landscape-scale change which includes regulatory incentives, funding (e.g. SRDP, WEF, woodland grants) and investment by businesses in natural assets.

3. How can designated sites help deliver large scale ecosystem restoration?

A search of SNH's designated site map shows that most of the CNPA is designated as SSI, SAC, SPA or National Scenic Area. There is, then, a unique opportunity to demonstrate wider ecosystem restoration within the Park using the designated sites as a basis for action. The benefits of broad-scale restoration would constitute a hugely informative resource and evidence base for other large-scale projects even where designated sites are not so prevalent. The CNPA should work with SNH and others to form a coherent large-scale restoration plan, including peatlands, wetlands, woodlands, rivers and lochs, to provide improved benefits (e.g. climate change resilience, increased habitat connectivity and quality, increasing numbers of priority species, improved underpinning of local economies).

General comment:

It would be useful for the Issues Report to indicate how the Park would respond to the re-introduction of European Beaver, should the Scottish Government decide that this is a positive policy decision. Beaver would provide a huge boost to biodiversity and tourism in the Park, but there are also issues of woodland resilience and flood management. A view of how such re-introductions might work and be managed would be welcomed by many stakeholders.

This Issues Report misses the opportunity to indicate how to improve the acknowledged pressures from upland land management practices contributing to ecosystem degradation such as muirburn, upland drainage for forestry, and over-grazing by unsustainable deer populations.

Issue 2 – Deer and Moorland Management

1. Policy Context

No comments

2. Other Drivers of Change

- 1) The third paragraph on page 4 is misleading and needs to be rewritten. As currently written, it implies that fencing for the purpose of keeping deer off grouse moors can assist habitat restoration and regeneration. While fencing in some situations can assist habitat restoration, in this case it will not, as modern grouse moors are subject to heavy muirburn which destroys any saplings or other forms of habitat restoration/regeneration. A simple look at examples where such fencing has been installed for a number of years will show no improvement in habitat.

3. Trends and Data

- 1) Sub-section 3.1 needs to be rewritten to distinguish between the two different sporting activities of driven grouse-shooting and deer-stalking. Driven grouse-shooting involves a lot of active land management, removing predators, erecting large fences, and excessive muirburn, and has a number of undesirable spin-offs such as raptor and mountain hare persecution on some estates. On the other hand, land managed for deer-stalking is essentially left untouched. The problem comes from the excessive numbers of deer, preventing habitat restoration. The management principles differ, and the possible solutions for a more sustainable future differ, e.g. problems of excessive grazing due to excessive deer numbers are best tackled via the existing deer management groups. Similar groups do not exist for driven grouse-shooting.
- 2) Sub-section 3.1 needs to present more up to date information on deer numbers. 2010 is now 6 years ago!
- 3) Sub-section 3.1 needs to present a more detailed analysis of deer numbers. The numbers presented suggest that overall deer numbers have reduced across the Park. However, efforts on estates such as Glen Feshie and Mar Lodge will be hiding increases on other estates. A significant effect is likely to be the extensive deer fencing to exclude deer from the grouse moors in the Angus glens. Given the very different management objectives across the different estates, a more granular approach is needed, enabling a more estate-specific approach to be developed.
- 4) On page 7, reference is made to the yield of venison. The driver on sporting estates is not yield of venison but numbers of stags. The data is relevant but needs to be used more thoughtfully.
- 5) Fig 4 should be supplied with a Key

4 is missing

5. Key Issues

- 1) A number of these Key Issues are inextricably linked via the management of land for driven grouse-shooting. 5.3 Raptor Persecution, 5.4 Hare Management and 5.7 Muirburn can only be solved by greater regulation of driven grouse moor management. 5.8 Hill Tracks are really only a problem on driven grouse moors. A more holistic approach towards the managers of driven grouse moors needs to be developed. This is likely to involve some degree of enforcement (of the existing law). A good example is raptor persecution, where the existing law needs to be better enforced. A recent incident on the Invercauld estate involving the illegal use of traps, as reported in the Press and Journal newspaper, shows the extent to which the existing law is being flouted. The CNPA should be actively encouraging land owners to look at less-intensive forms of grouse moor management. At the meeting on 13/9/16, cutting of heather rather than burning was mentioned – surely this should feature in the plan as a positive way forward? This sort of approach is surely the sort of “collaboration” that the CNPA is looking for?
- 2) Sub-section 5.4 on hare management makes no mention of the existing evidence (as submitted to the SNH Scientific Advisory Sub-Committee on sustainable moorland management) that mountain hare numbers have declined dramatically due to over-culling on driven grouse moors. This was accepted and is the basis behind the statement agreed between the SLE and SNH on the need for voluntary restraint in culling mountain hares. The agreed need for some form of voluntary restraint should feature in the Plan.
- 3) We challenge the statement that hill tracks are necessary for deer control, and suggest that your staff visit estates where deer stalking is conducted with a minimal network of hill tracks. Carcass extraction can be successfully achieved with ATVs and ponies.
- 4) Sub-section 5.8 on Hill Tracks needs to refer to the recent changes in planning legislation requiring Prior Notification before the construction of any new tracks. The role of the CNPA in liaising with the local planning authorities and in policing these prior notifications should be clarified.
- 5) Sub-section 5.9 on Economic Development needs to make clear that any such development has to be compatible with the over-riding aim of conservation of the natural environment.

6. Summary

- 1) Issue = “Raptor persecution and underlying conflicts between raptor conservation and the impacts of muirburn” – What is the conflict between raptor conservation and muirburn? We don’t understand this.
- 2) Mechanism for Delivery. In line with Scotland’s WDNA proposing the need for government action if the current voluntary arrangement fails to produce the needed

improvements, this section needs to refer to some form of enforcement should the existing voluntary arrangements on certain estates continue to fail.

- 3) The Park Authority needs to take a more active role in the management of both driven grouse moors and land managed for deer stalking.

Key Questions

- 1) The plan should definitely set guidelines on appropriate deer densities to deliver the public interest. This should be done in consultation with SNH.
- 2) Management of moors for grouse needs to be better enforced. There is still room for partnership, but a more equal partnership between land owners and guardians of the public interest. Raptor persecution is a good example of estates denying responsibility yet driving their gamekeepers to commit crimes.

Issue 3 Flood Management

1. Policy Context

1.05 WEWS Act 2003. It should be pointed out that there is specific protection given to Wetlands somewhat beyond the Water Framework Directive which the Act applies in Scotland.

1.10 The most relevant Big Steps for Nature of the Scottish Biodiversity Strategy include Investment in Natural Capital. There appears to be no further thought given to this key Government strategy in the Plan. Amongst the Priority Projects under the SBS it seems an omission to not include 8. Protected Areas in Good Condition, as this implies healthy ecosystems contributing to natural flood management over a very large area of the National Park.

1.13 It would have been informative to consider which of the 14 actions in the WDNA are being applied within the Park to achieve a sustainable deer population in order to help deliver natural flood management.

The Cairngorms Nature Action Plan is one of the few places in this Issues Report where actions and targets are listed. Although the targets for new native woodland and restored peatlands are welcome, those for new wetland and natural flood management (25 ha) is very weak and unambitious considering the flood risks identified in the report and the later statement about the drastic decline in functioning wetlands (section 3.04).

2. Other Drivers of Change

2.03 Natural Capital misses the fundamental importance of investment in natural capital by all stakeholders, including land managers, to maximize public benefits, including flood management services. The Plan would benefit from describing how such investment might be encouraged and why it will be of benefit to service providers of this public good.

The NPPP preamble states that the Plan will guide the work of partners to deliver the aims of the Park and show how the Park will contribute to the Scottish Government's core purpose and national outcomes. It would, therefore, have been useful to provide a summary of how all of

this policy context is being applied to the National Park, for example, in relation to specific need for action as required by the policies.

3. Trends and Data

3.01 Flooding in the CNP. It is important to provide estimated future impacts of climate change, but this could be improved by including a little more detail. While winter river flows are predicted to increase, summer flows are predicted to decrease in this part of Scotland (SEPA, SNH reports). This has implications for land management, for example, the need to reduce artificial drainage of upland areas.

The description of the Potentially Vulnerable Areas in the catchments within the CNP is very useful context. If available, the potential for damage to infrastructure out with these PVAs, for example to bridges and roads around Braemar, would also be very informative.

3.03 Natural Flood Management. In addition to the explanation given on the benefits of NFM, it would be worthwhile to refer to the value of the natural ecosystem services provided by managing land and catchments to provide flood prevention benefits. This can be considerable in avoided costs of flood defence works and makes the point very strongly.

3.04 Wetland Habitats. The importance of wetlands, including types other than peatlands, is well worth emphasizing, along with the stark facts about the losses of these important habitats in the CNP. The importance for NFM is indicated in 3.03 but as already mentioned in our response above, it does then appear very unambitious to have a target of only 25ha of wetland and NFM restoration within the Park extent of 452,800 hectares. The availability of SRDP and Water Environment Funding for restoration begs the question of why so little of it is taken up with new restoration initiatives in the CNP.

The statement that CNP waterbodies are in relatively higher ecological status than the rest of Scotland is wrong. In fact, across both RBMPs in Scotland, the proportion of river waterbodies at good or high status is 54% (SEPA website) so the CNP fares no better than the average condition, which is disappointing for a National Park. This is emphasized by the degradation highlighted in the report of over one fifth of waterbodies in the park over recent years, and one sixth being in poor or bad status currently. It would be useful to indicate the causes of ecological status failures, especially the proportion due to physical modification which has a direct relevance to flood management and the need for restoration.

It is correctly reported that there has been an apparent recent, and very significant, decline in freshwater pearl mussels in the River Spey. The causes of this are as yet very uncertain (SEPA Reports) and appear to be related to increases in sediment rather than water quality. This again points to the need to manage sediment inputs to rivers through appropriate land management practices which also potentially delivers NFM.

3.05 River Catchment Initiatives. The partnerships working to deliver improvements in catchment management are vital and have proved very effective. But the Issues Report should make it clear that there are very few NFM initiatives planned for the CNP area. The

single example for the Allt Lorgy is a very good demonstration; in fact, it was an award-winner in the UK River Restoration Centre Awards in 2016. However, there seems to be far too few such schemes in the Park despite the flood risks identified. The National Flood Risk Management Plans published by SEPA include very few NFM actions in the strategic planning to alleviate flood risk. This is a major issue that should be highlighted. There is good evidence of the efficacy of NFM in reducing flood peaks in other parts of the UK that could be used to encourage more such initiatives in the CNP.

3.05 Landscape Scale Habitat Management (3.05 repeated numbering in the Issues Report). It is absolutely true that the landscape scale is required to deliver cost-effective flood management services to the public and to provide the co-benefit of conservation of healthy ecosystems. Although there is a general recognition that increasing native woodlands and restoring peatlands will help to provide NFM, the Issues Report misses the opportunity to indicate how to improve upland land management practices contributing to flood risk such as muirburn, upland drainage for forestry and over-grazing by unsustainable deer populations. The recent changes in SRDP approach have led to reductions in sheep grazing and increases in ground cover but the CNPA should commission research to see how this has affected flood risk. This information would be very informative in deploying the SRDP over the period of this Plan.

No section number: Uplands. The Issues Report again indicates the unfavourable impacts of poor upland management such as muirburn and over-grazing, and also indicates the improving viability of driven grouse shooting, presumably exacerbating these problems. The very poor state of our peatlands is also mentioned alongside the Government initiative to restore 2000 ha within the CNP by 2018. In context, this is 0.44% of the National Park area and not that ambitious for the most iconic National Park in Scotland.

Key Questions

1. What land use changes are needed to deliver more effective natural flood management and how can these be supported/funded?

The key changes relate to upland management where intensive moorland management practices have led to huge pressures on natural flood management processes. Several actions are required including: large-scale restoration of peatlands, for example in re-wetting and restoring blanket bog cover; establishment of natural woodlands, especially riparian woods; the cessation of muirburn on hydrologically sensitive ground; and the restoration of wetland connectivity, especially in floodplains. In artificially constrained floodplains, more land is needed to store flood waters and appropriate mechanisms (e.g. SRDP, other payment for ecosystem services schemes) used to compensate land managers if alternative uses are compromised. The Scottish Government's Strategic Research Programme (2017-2022) is developing methods and tools for natural capital accounting and options for funding and investment that could be piloted by CNPA for natural flood management.

2. How can catchment management partnerships be better used to help deliver natural flood management as part of flood risk management?

Catchment management partnerships often have the key stakeholders that need to communicate and consider options for natural flood management. Pilots elsewhere have shown that providing such stakeholder groups with knowledge on flood risk and scenarios for alternative uses of land that includes natural flood management (e.g. Strathard pilot project) works well. It is disappointing that there are very few NFM activities currently being pursued within the Park, and the catchment management partnerships should be actively supported to develop many more initiatives.

General comment

It is appreciated that this is a consultation that wishes to engage stakeholders in identifying issues and to provide an overall strategic vision for improving the condition of the CNPA. In terms of flood risk management, there is much to commend NFM in a National Park. There are, however, very few NFM initiatives being proposed within the lifetime of the Plan, and this is something the CNPA should address.

Issue 4 Visitor Infrastructure

1. Policy Context

1.2 Tourism Scotland 2020

Care is required in “turning the assets (including Nature, Heritage and Activities) into visitor experiences” Part of the positive experience is people exploring nature for themselves. The use of good interpretation and the ranger services can assist in this but should not detract from the asset itself. We continue to emphasize the zoning principle, with management practice appropriate to the sensitivity of different areas of the park. The Park is not a uniform geographical area, and a standardized approach is not appropriate everywhere. The core area is our priority, and should be subjected to little or no development.

1.3 National Park Partnership Plan 2012

We emphasise the need to give greater weight to the first aim (section 9.6 of the National Parks (Scotland) Act). Conservation of the natural and cultural heritage underpins the economic and recreation value of the National Park.

Long-term outcome 3 needs to be set alongside long-term outcome 2

(A special place for people and nature with natural and cultural heritage enhanced).

It is recognised that people play a key part in the Park but their presence must not detract from its fundamental qualities. Visitors are vital to the local economy and need to be attracted to the area, but they must be managed appropriately.

2. Other Drivers of Change

2.1 Active Cairngorms 2015

It is very worthy to aim for health benefits for the resident population. It is also appropriate to encourage visitors to lead healthy lifestyles, but many will find that easier – and of longer-lasting

benefit - in their home area. Visitors will be there for a variety of reasons. Facilities should not simply aim to increase visitor or activity numbers within the Park.

Making it “easier and safer” to move around the Park should target the existing corridors of activity rather than new areas, particularly in the core, wilder areas. There should be little or no new infrastructure in the core areas. Great care is required if new services are proposed in these core areas.

2.3 Cairngorm & Glenmore Strategy (2016)

We welcome the cooperation of this new partnership, and await its definitive strategy document. It has the potential to be good in focusing on a smaller area (than the whole Park), which has specific management problems, and can focus on place-specific “solutions”.

2.4 Scottish Scenic Routes

It is appropriate to recognize the importance of certain routes within the Park. We do not agree that introduction of modern, artificial features in open countryside is “enhancement”. It should be made clear what is natural and what has been introduced. Limited resources for interpretation are better spent on ranger services and on interpretation boards close to existing developments.

We recognize that the major trunk road (A9) already passes through the Park. Dualling this road gives the opportunity to provide appropriate roadside facilities. These should be in limited areas, preferably close to urban environments.

3. Trends

The increase in visitor numbers is welcomed for the support it provides for the local economy. There is a need to be aware of the capacity of popular areas. The load may need to be spread across the Park rather than further developing existing popular areas. The seasonal variation is understandable for traditional activities that are dependent on the weather. Further development of “off-season” activities should be targeted away from the core Park area, as they are likely to require significant built infrastructure. Facilities in or near existing settlements may be able to be adapted or extended, rather than new build.

3.1 Cairngorms Visitors Survey

We acknowledge the utility of the standardised methodology of this survey over time. The high level of satisfaction with the current facilities is welcomed, and care should be taken to avoid reducing this by change.

3.2 Visitor Facilities

There is a clear tension between provision of technical facilities and the wild character of the Park. There is no indication of what proportion of visitors viewed limited availability as a positive or negative aspect.

3.3 Infrastructure

The previous investment with tangible outcomes is welcomed. Visitor Centres etc. provide valuable

information and interpretation for visitors. It is important that these facilities are available for as much time as possible through the year. Ranger services should be given a high priority, with no further losses in the current financial climate. To protect the environment and encourage active participation, footpath management remains important. It is of concern that 666 miles of core path have been designated, and 200 miles signed, but that only 80 miles of upland path have been repaired. There is clearly a backlog of work to be done. Funding for regular small-scale path maintenance can avoid the need for more costly re-construction at longer time intervals. There is over-emphasis on the Deeside and Speyside Ways.

5. Mechanisms

The major capital projects are to be welcomed although the detail is not presented here. There remains a need for local projects that make a difference to individual visitors, many of whom live close to the Park and visit frequently.

6. Key Questions

Although mentioned, Path Maintenance and Public Transport are not emphasised in this document. The current efforts to encourage volunteers to help with path maintenance and repairs as part of the Mountains & People project are worthy of mention.

There is no mention of the objective to learn about, care for and appreciate the Park. This is a key function of interpretation and the Ranger Services.

Many short-term visitors have little contact with providers. The limited opening times of facilities, particularly in the “off season”, may make it difficult to engage, and make return visits less likely. There is continuing need to improve the availability of timely information on activities which may impact on the visitor experience (including stalking). We suggest offering training to provider staff in shops, visitor centres and accommodation to improve their communication with non-English speaking visitors.

General Comment

A major aspect of developing visitor infrastructure will be to ensure that the concepts of “sustainable tourism” are fully taken on board. This needs to be addressed as further development is encouraged. Excessive development without considering the three strands of sustainable tourism will simply destroy the very reason that people choose to visit the Park. It should form a substantial section in this part of the Plan.

Issue 5 Active Cairngorms

1. Policy Context

The policies are appropriate

1.1 Scottish Government: Active Scotland Outcomes

{assume that outcome (2) is to “encourage and enable the active to stay active throughout life”

(rather than the “inactive”)

2. CNPA Drivers of Change

Active Places

2) The Highland Main Line initiative:

We assume that the Kingussie initiative is aiming for 2018 (not 201g).

We welcome this development and encourage cooperation with Scotrail to enable more cyclists to take advantage of the investment. The plan should also encourage cycle hire with maximum flexibility to use the service.

We also welcome the proposed investment to upgrade the Deeside Way.

Active Management

4) (Organised outdoor events):

Continue to explore ways to bring people into the area (for economic benefit) without detracting from the natural resource or the enjoyment of others. Again the zoning principle is important here – it is easier to defend refusing permission if it is in keeping with a consistent policy. Certainly support the discouragement of events in sensitive areas.

Care should be taken in expanding organized parking (and consequent charges). Alternative forms of transport should be encouraged – e.g. cycle hire and shuttle bus services close to the current public transport stops (including train stations). Bus services to be encouraged include Braemar to Glenshee and Linn of Dee, Aviemore to Glenmore.

Active Promotion

Little detail of what is proposed

3. Trends and Data

Encouraging data from SPANS. Mostly a snapshot – helpful to know how these figures change with time (similar to Cairngorms Visitor Survey)

3.3 Health Walks – mainly targeted at residents

3.4 Natural Health Service – investment in infrastructure to allow a wider community to become active. It is a difficult balance between maintaining the natural capital and investing in/developing that asset.

5. Mechanisms

6.3 Volunteering – very worthwhile with double benefit of making a difference to the environment and individual health. Current opportunities (mostly NGOs) are not well advertised and may have limited capacity for increased participation without additional leadership and resources.

6. Key Questions

Increased participation requires both the individual motivation and the presence of appropriate facilities. Some initial hand-holding may give people the confidence to become more independent and adventurous. National Parks may not be the best place for urban participants to initially engage in activity. Groups local to potential visitors' homes may allow them to develop an interest and experience that they can subsequently be encouraged to use further afield in areas including our National Parks.

Volunteering requires better publicity and co-ordination. Activities should have very clear outcomes and should retain the interest of volunteers. There are benefits from on-going projects that give participants a sense of ownership, encouraging them to return.

Issue 6 Learning and Inclusion

We have no comments on Issue 6.

Issue 7 Community Capacity

The Consultation document is heavily focussed on "local communities". While this is understandable (e.g. in terms of the recent Community Empowerment Act) and important (e.g. in terms of Plan support and engagement by Park residents), regional and national "communities of interest" such as those related to recreational activities, scientific concerns or cultural interests should also be considered if the Park is to live up to its "National" label. We understand that occasional meetings are held between representatives of the Park Board and of LINK, but this may not deal adequately with more specific concerns held by e.g. recreational groups with particular interests in the Park, e.g. a club property, or frequent society visits.

At the meeting on 13/9/16, you mentioned the idea of using community right-to-buy as a possible way forward to solving problems of affordable housing and reducing second-home / holiday home problems. We were impressed with this idea and agree that it merits seriously taking forward.

Key Questions

- 1) Are there sufficient support structures available, particularly in the most fragile communities?

We suggest that the Park consider ways of engaging more closely with such communities of interest, in particular hillwalking groups who may be based outside the Park but have a close and ongoing interest in the conservation and informal recreation within its boundaries. At present, such groups have to monitor developments within the Park somewhat at arm's length, e.g. by regular consultation of Park bulletins and planning registers which contain much information not of specific concern to such groups. This might be done by:

- issuing twice-yearly messages (e.g. by mail) to such groups, outlining current topics of mutual interest
- holding annual meetings of Park and group representatives, perhaps by rotation on Speyside, Deeside and Glengarryside.

- 2) How should communities be supported, given the Community Empowerment and Land Reform Acts?

The focus of the Community Empowerment Act is on the delivery of local services, which is of marginal concern to the NEMT. The Land Reform Act is of more direct NEMT interest, particularly as regards the transparency and accountability of land ownership. Scottish Ministers are now under a statutory duty to issue guidance on “engaging communities in decisions relating to the land which may affect communities”, and we take the view that this should involve “communities of interest” as well as “local communities”. The kind of “support” needed by the former type of communities is largely related to timely communication with the Park Authority and others. Such arrangements can be of two-way benefit, in that communities of interest can often provide ideas and information which can be useful in arriving at a balanced approach appropriate to a “national” Park, rather than giving excessive weight to narrow and localised views.

In particular, we wish to see the Park Authority encouraging Deer Management Groups to engage regularly and constructively with both sets of communities. We should also like to see the Park taking a similar stance as regards grouse shooting, which in some ways and places is having a more intensive (and environmentally negative) effect on moorland, e.g. via heather burning, and the establishment of more hill tracks, shooting butts and huts.

Issue 8 Housing

Our comments are general, and apply across all four sections of the Issue report.

- 1) Although the issue of An Camas Mor is now largely settled, we remain opposed to this development, and will support other groups in ensuring that all due processes are fully complied with. We note that current progress is slow, and suggest that the market is telling you exactly what we and other NGOs said a number of years ago: this is the wrong development at the wrong time. We trust that the Authority will think very carefully before encouraging another such excessive development anywhere else in the Park.
- 2) The data presented clearly show the ongoing “honeypot” effect around the greater Aviemore area. Park policy needs to acknowledge that this is undesirable, and state how it intends to produce a more balanced development across the Park, considering places such as Ballater and Blair Atholl. This is likely to require a move from a passive role of reacting to developments as they are proposed by the private sector to a role of collaborating with the private sector to encourage development to be spread more evenly across the Park.
- 3) There needs to be some analysis on the likely impact of the ongoing completion of dualling of the A9. This has the potential to make a significant impact.
- 4) There is no information in the document about how other relevant authorities manage affordable housing. To quote two examples, both Highland and Western Isles Councils have extensive experience of providing affordable housing in remote areas. Surely, there must be something to be learnt from how they manage the problem?
- 5) There is no information in the document about contact and liaison with housing associations in other parts of Scotland to learn from their expertise in providing social rented and affordable housing.
- 6) The issue of second homes is not unique to the Cairngorms area. Have visits been made to LLTNP staff to find out how they manage to achieve a significantly lower percentage of second homes? At first sight, given their proximity to the large urban development in the Central Belt, they should have a higher percentage of second homes. Clearly, they are doing

something different that should perhaps be copied. It is too easy to simply dismiss their better performance on one or two factors, not relevant to the Cairngorms Park.

In addition, staff should contact their counterparts in the English National Parks, particularly the Peak District, where again there is a better record on second home ownership.

- 7) Overall, the Issue report needs to be rebalanced, putting more emphasis on the need for more social rented and affordable housing and reducing some of the voluminous data presented, which provides excess detail and confuses the key issue.
- 8) The document needs to address the issue of good design, in keeping with the Cairngorms surroundings. This is a difficult topic because it is essentially subjective. However, being difficult does not mean that it should be ignored. Again, communication with the Lake District and Peak District National Parks in England will give some examples of how this might be taken forward. Switzerland and Austria both appear to be able to impose a “vernacular” style, which is widely admired by visitors.

Key Questions

- 1) How can more housing that is affordable to people working in the National Park be delivered?

As we have stated above, the Authority needs to engage externally to see how others manage this issue.

- 2) How can the proportion of second home ownership in the National Park be reduced? Again, as above, the Authority needs to engage externally.
- 3) How can best use be made of the existing land supply (e.g. what types of housing should be prioritised)?

The answer is obvious. Social rented and affordable housing needs to be prioritised. The question should be rephrased as to how these priorities might be achieved.

Issue 9 Economic Development

The current Park Economic Strategy is for 2015-18 and will presumably be reviewed in 2017-18; the Consultation Plan makes little reference to the overlapping periods of validity of these two documents, although presumably an important initial exercise under the Plan will be to revise the Strategy.

There is a lack of connection between some of the “Issues” identified in the Consultation Draft (e.g. limited public transport, consistent ‘buy-in’ to the Park brand, low wages in tourism) and the “Targets”.

Key Questions

- 1) How can the National Park tourism sector be strengthened?

We suggest emphasis on “visitor” (rather than “tourist”) infrastructure which is landscape- and wildlife-oriented (and -friendly, of course), rather than too much emphasis on sheer physical activity, much of which can be carried out elsewhere, with less pressure on scarce and vulnerable natural assets.

We suggest study of experience and expertise elsewhere as to tourist/visitor numbers and types by season, including how other UK and foreign tourist centres handle “shoulder” and “dead” periods in terms of staff, marketing, etc.

- 2) How can businesses be better connected with the natural environment for economic benefit?

We support the promotion of the Park brand for food, drink and forestry products, especially if its wildlife/landscape character can be emphasised (simplified versions of the sun/osprey/fish logo, e.g. on road signs, are not particularly obvious in nature).

There may be a conflict between using the Park logo for access purposes (e.g. signposts) and those used by Forestry Commission Scotland, ScotWays, etc. In such cases, we prefer the use of “national” logos and formats, with which most visitors will already be familiar.

Commercial forestry has a rather poor record in terms of creating landscape and access “wounds” after felling, with increasingly larger machines. We wish to see strict enforcement and encouragement of good-practice forest management in this respect, e.g. full re-instatement of parking/turning areas, attention to areas left puddled and boggy, improved handling of brash.

- 3) What more can be done to diversify the National Park’s economy beyond tourism?

No response, except to avoid over-emphasis on “tourism”, especially in sectors which may already suffer from over-provision (self-catering chalets?), or which may seek to serve only a small and high-priced tourist sector (Fife Arms, Braemar?)

- 4) Have the right key infrastructure priorities been identified, or are there others that should be included?

We wish to see efforts at promoting economic development dispersed amongst the various settlements in the Park; Aviemore is an example of excessive pressures on one such settlement. In this way, the effect of unavoidable mistakes in physical location and design can perhaps be reduced.