

Draft Cairngorms National Park Plan Responses from Organisations – Part 2

Dunachton Estate

Dunecht Estate & Edinglass Estate

Federation of Small Businesses

Forest Holidays

Forestry Commission Scotland

Forestry Commission Scotland

Grantown-on-Spey Community Council

Highlands & Islands Enterprise

Historic Scotland

John Muir Trust

Kincraig & Vicinity Community Council

Laggan Community Council

Mar Estate

Nestrans

Nethy Bridge Community Council

North East Mountain Trust

Perth & Kinross Council

Pityoulish Estate

Ramblers Scotland

Rodgers Builders

Rothiemurchus Estate

RSPB Scotland

Scotia Homes Ltd

Scottish Campaign for National Parks

Scottish Enterprise

Scottish Environment Protection Agency (SEPA)

Scottish Land & Estate

Scottish Native Woods

Scottish Natural Heritage

Scottish Rights of Way and Access Society

Scottish Wildlife Trust

Seafield Estates

Sportscotland

The Cairngorms Campaign & The Scottish Wild Land Group

The Crown Estate

The Highland Council

The Mountaineering Council of Scotland

Tactran

Transport Scotland

VisitScotland

Walk Deeside

Woodland Trust Scotland

8th December 2011

Cairngorms National Park Authority
Freepost NAT 21454
Grantown-on-Spey
PH26 3BR

Our Ref NM/1010168
Your Ref

Dear Sir / Madam

Dunachton Estate Representation to Draft Cairngorms National Park Plan 2012-2017

Introduction

We have set out below our response to the Draft Cairngorms National Park Plan 2012-2017 on behalf of Dunachton Estate. The response has been numbered using the numbering from the "Consolidated List of questions" attached to the Draft Plan at Appendix 2. This response only relates to the questions which are most relevant for comment on behalf of Dunachton Estate, therefore there are not responses to all questions.

Questions 1-3 – Special Qualities of the Park

We support the recognition of the special qualities of the Park as extending beyond the natural heritage, and welcome the addition of the cultural heritage, recreation opportunities, tourism, and acknowledgement of the people living and working within the Park as important 'Special Qualities' within the Park.

We encourage the emphasis of the importance of preservation, enhancement and creation of suitable and sustainable communities within the Park, and the provision of suitable housing and economic opportunities for people living and working within the Park.

Question 4 – Strategic Objectives

Notwithstanding the conservation and enhancement of the natural and cultural heritage of the Park as long-term outcomes, the sustainable economic development of the Park is also of fundamental importance to allowing the Park to thrive now and in the future, providing and supporting "thriving and resilient business and communities" and delivering and providing "outstanding visitor experiences".

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Condensing these long-term outcomes may dilute the importance of the message which they convey. Of particular importance to our client would be the retention of a strong message on the delivery of housing to meet the needs of those living and working within the Park (number 14); the development of skills and employment options to meet the needs of individuals and businesses, and the stimulation of economic activity promoting thriving businesses within the Park (numbers 10 and 11); and the promotion and development of a "vibrant renewable energy, recycling and waste sector" for the Park (number 15).

Questions 5-6 – Focus for 2012-17

The most important outcomes for the next 5 years for Dunachton Estate are the following:

*"Outcome 6: The economy of the Park will have grown and diversified, drawing on the Park's special qualities;
Outcome 7: Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park;
Outcome 8: Business and communities will be successfully adapting to a low carbon economy; and
Outcome 9: The Park's communities will be more empowered and able to develop their own models of sustainability."*

Comments on each of the Outcomes above form the remainder of this representation.

Question 12 – Focus for 2012-17, Outcome 6

Outcome 6 relates to the economy of the Park. Whilst we support the proposal of growth and diversification of the economy of the Park over the next 5 years, it would be useful to have a clearer definition and explanation of exactly what is meant by "diversification". Furthermore, greater clarification should be given to what new business sectors should be encouraged to develop and grow within the Park".

We support the recognition that if business development is to increase in the next 5 years, that suitable housing for workers must be in place to support this economic development, noted within the table on Outcome 6, under "What's needed to deliver this outcome" and "What packages of work could deliver it". We would, however, like to see this come out more strongly in the words of the text, and suggest adding further text to explain this and emphasise the need for workers to be able to access housing within the Park.

Question 13 – Focus for 2012-2017, Outcome 7

It is noted that the aims of the park are to protect and enhance the sense of place within the Park. However this Outcome does not go far enough to recognise that the Park also requires new housing, and that there will be a degree of housing development within the Park. Within the table under "What's needed to deliver this outcome", it is noted that "new development is designed and sited in ways that retain and enhance the sense of place and Cairngorms identity". This recognition of new development should also be noted within the main text for this Outcome, whilst recognising that any development must retain the sense of place and identity of the Park.

Within Outcome 6 it is acknowledged that access to suitable housing is required for those working within the park. For consistency, this acknowledgement should also fall within Outcome 7, therefore adding text to include access to housing for employees is requested. In addition, a further bullet-point could be added to the table within the column entitled "What's needed to deliver this outcome" to add further to the consistency, stating "opportunities for new development to provide suitable housing for those wishing to live and work within the Park".

Question 14 – Focus for 2012-2017, Outcome 8

We note and support the ethos of business and communities successfully adapting to a low carbon economy. There is an opportunity here to further emphasise the benefit and opportunity of renewable energy schemes of varying scales to achieve a low carbon economy within the Park area, and more sustainable living and working. We acknowledge that this is mentioned within the table for Outcome 8 under 'What's needed to deliver this outcome', however, it should be within the text of the Outcome to emphasise the opportunity.

This representation is submitted both by email and post to the Cairngorms National Park Authority, together with the completed 'Respondent Information Form' as requested, in advance of the consultation deadline. We would appreciate acknowledgement of the receipt of this representation, and further information in due course about how representations will be scrutinised and taken forward.

Yours faithfully

**Nikola Miller MA (Hons) MSc URP MRTPI
Planning Consultant**

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DUNECHT ESTATES
EDINGLASSIE ESTATE, STRATHDON

CONSULTATION RESPONSE – DRAFT CAIRNGORMS NATIONAL PARK PLAN –
2012/2017

Introduction

Edinglassie Estate extends to c15000 acres and lies to the north of the River Don broadly between Candacraig and Corgarff. The Estate includes grouse moor, tenanted farms, woodlands and a number of tenanted houses. Edinglassie has 4 full time employees.

The Estate forms part of Dunecht Estates a group of six Estates covering c53000 acres in Aberdeenshire and Kincardineshire. Dunecht Estates are owned by The Hon Charles Pearson and Trusts for his children and are managed by an in-house team based in Dunecht village nr Westhill, Aberdeenshire.

Section 2

Question 2

We broadly agree with the descriptions of the special qualities. However we believe the Plan should recognise more explicitly that land based business (farming, forestry and sportings) deliver the landscapes and habitats that contribute so significantly to the Park's qualities. Key theme 2 should be expanded to explain that the unique mosaic of habitats of very high quality is predominantly a result of generations of management for farm, forestry and sporting (grouse/deer/salmon) purposes.

Section 3

Question 4

There should be a comprehensive review of the long term outcomes as part of the 5 year Plan process. This review would then identify whether the 23 outcomes should be condensed or even expanded. We also suggest that such a review would include an assessment on whether individual outcomes are necessarily compatible with each other and if not which of the outcomes in conflict is most in line with the four aims for Scottish National parks as set out in the 2000 Act.

Section 4

Question 5

We contend that the set of outcomes needs to better reflect the objective detailed in long term outcome 11 ie thriving businesses that will be an economic asset to the wider regional economy. Sporting interests should be recognised as having particular opportunity to grow the economy, delivering consequent social benefit and at the same time conserving/enhancing the natural heritage.

Question 6

We consider outcomes 2, 3, 5, and 6 as the most important.

Question 8

We suggest that the focus should extend beyond woodland and wetland and include moorland. Increasing the quality and connectivity of the moorland habitat will enhance the landscape at a Park scale. Little (if any) justification is given for looking at woodlands and wetlands alone. We have significant concerns that extending the area of woodland would

result in a loss of moorland ie the trees have to be planted/established somewhere. The Plan is weak on acknowledging and seeking to enhance the multi benefits moorland delivers in relation to the natural heritage.

Question 9

We agree that outcome 3 is appropriate for the 5 year Park Plan.

We are very hopeful that the Wildlife Estates Scotland Initiative will develop successfully and that a large number of Estates will be participating in level 2 at the end of the 5 year period. However it must be recognised that the Initiative is still at the pilot stage.

It is of fundamental importance that an updated local biodiversity action plan is prepared. This should have input from a full range of stakeholders including individual land managers and not solely the LBAP partnership.

Question 10

We could not identify anywhere in the document a definition of 'wildness'. It is likely to mean something different to different people. Without knowing how wildness is being defined (or has been assessed) it is difficult to see how the area characterised as high or medium wildness can be increased.

Question 11

We support outcome 5. It is essential that land managers and their representative organisations are involved in developing programmes identifying public benefit priorities and reconciliation between competing land uses.

Question 12

We consider this outcome as very important. However it is disappointing that the draft Plan makes no specific references to growing and developing the farming, forestry and sporting industries. The Plan should be identifying that work will be carried out to assess how landed businesses can expand and their potential maximised. These businesses are often the most significant employers in the remotest parts of the Park area and they have the capacity to deliver social and environmental benefits as well as economic advantages.

Section 5

Question 17

Yes.

Questions 19/20

Woodland and Forestry

The suggestion that conversion to other land uses is a threat to the Park's woodlands is difficult to comprehend. Converting woodland to an alternative land use is not easily achieved. It is in fact far easier to convert other land uses – farmland and moorland – to forestry. The Plan sets out that such conversion is desired without thoroughly examining the advantages and disadvantages of these alternative land uses or measuring what each delivers against the Parks strategic objectives or the 23 long term outcomes.

Rivers, Lochs, Wetland and Floodplains

The Plan should note that as well as enhancing the quality of recreational use eg fishing there is an opportunity to further develop the economic benefits that salmon and trout fishing bring to the Park. These include spin off benefits for hotels, pubs, B&Bs, shops etc given the spend of visiting anglers. Furthermore that plan should recognise that vibrant fisheries also deliver

environmental improvements via assessments paid to Fishery Boards which are in part then reinvested in habitat improvement programmes eg improvements to field waterings/fencing of river margins thus tackling erosion and diffuse pollution.

We also believe the Plan should identify as a threat conflict between recreational users of rivers eg anglers and rafters.

Mountians, Moor and Heathland

Under strengths the Plan should recognise that not only is the mountain landscape unique but the moorland landscape is too. The extensive areas of moor within the Park should be acknowledged as an asset and one that as well as having an important sporting role is an important asset to the tourist industry. The rolling heather clad hills of the Cairngorms are a key attraction.

The Park should consider as an opportunity the potential to resolve conflicts between predators and prey.

The potential to further develop and grow the grouse shooting economy should be noted as an opportunity. Grouse shooting is widely acknowledged as the finest and most challenging bird shooting in the world. There is a further opportunity within the Park to maximise the contribution shooting, stalking and fishing make to down the line businesses eg encourage the provision of all levels of accommodation within the Park thus avoiding leakage, unnecessary travel etc.

Question 21

Policy Direction 1

It is important that there is engagement/consultation with land managers before the Cairngorms Landscape Framework is completed next year.

Question 22

Policy Direction 2

We agree with the policy aim of achieving favourable condition of designated sites. However there needs to be recognition that with some sites it will be near impossible to achieve this condition due to external factors which cannot be controlled eg climate change.

The Plan does not set out how 'net biodiversity loss' would be calculated although the presumption proposed is laudable. This policy is something that should be developed with land managers and could be progressed in conjunction with the Wildlife Estates Scotland Initiative.

Question 23

Policy Direction 3

We have already commented on woodland expansion. While we recognise that the Scottish Government has a policy objective of increasing woodland cover to 25% of the land area we question whether it is correct that the Park should be seen as the appropriate place for any expansion. The reality is that if woodland area is to increase then this will be at the expense of farmland and/or moorland. Full analysis (in a Park context) of the economic, environmental and social benefits provided by each of the land uses should be carried out and be consulted on widely before woodland expansion is promoted other the others.

Question 24

Policy Direction 4

We generally agree with the approach set out. The policy could usefully refer to the protection of moorland recognising its function in relation to carbon storage.

Question 25**Policy Direction 5**

We broadly support the proposed approach to the Park contributing to a low carbon economy.

Question 26**Policy Direction 6**

The policy should recognise that shooting, stalking and fishing are recreational activities. The Plan has a tendency to focus on 'access' (presumably for walking) when it should consider all recreational activity in policy making. The Plan should also examine how conflicts between recreational activities are mitigated.

Question 28**Policy Direction 7**

We support the policy approaches proposed.

Conclusion

Edinglassie Estate is a mixed property with farming forestry and sporting interests. It will not be unique in terms of these interests especially in the more remote parts of the Park. As can be seen from the questions answered and the responses given we believe the Plan needs to give more focus and greater recognition to traditional land management interests and the wide mix of environmental, economic and social advantages they contribute to the Cairngorms.

8th December 2011

FSB – Badenoch & Strathspey Branch



Federation of Small Businesses

The UK's Leading Business Organisation

Comments from the Badenoch & Strathspey (B&S) Branch of the Federation of Small Businesses (FSB) to the Cairngorms National Park Authority (CNPA) on the draft National Park Plan 2012-17 (NPP2)

The FSB is pleased to submit a response to the public consultation coordinated by CNPA on the NPP2 and are aware of the complex structure of the NPP2 and the large number of viewpoints which must be considered. The facilitation of a sustainable economy and social development is the aim that our comment will focus on.

Appendix 2 – consolidated list of questions for CNPP 2012-17

SECTION 4 – The FSB believes the 10 Outcomes of the NPP2 will provide the right focus for the next 5 years. However, the FSB emphasise that the second point in the proposed long term vision for the Park “To develop a sustainable economy, that supports thriving and resilient businesses and communities” is fundamental to the Park’s success and should never be forgotten or overlooked. Opinions and viewpoints must be researched constantly from the vast range of business sectors which are currently located in the CNP and of those we wish to emerge. Following the priority which will help people learn about the Park and its special qualities to foster business responsibility, businesses will make balanced, positive comments.

The most important outcomes to the FSB are 1, 4, 6, 8 and 10. However others will touch on the myriad of diverse businesses in CNP.

OUTCOME 1

More people will learn about, enjoy and help to conserve and enhance the special natural and cultural qualities of the Park

The FSB believes that it is essential that all businesses truly understand the aims and objectives of the CNP and all that it stands for, including environmental conservation and sustainability. Consequently CNPA are required to contact all businesses to familiarise them with this and to explain their responsibilities. Although much work has occurred to introduce and teach enterprise whatever the size many have not recognised their connection and involvement and this must therefore continue.

The packages identified are wide ranging and would deliver it. The FSB is a national member-led organisation with local volunteer committees who will actively work with Cairngorms Business Partnership (CBP) to advise them of the small business viewpoints. The private sector within the park is dominated by small businesses and communication strategies and any implementation needs to take this into account.

The local Branch (Badenoch & Strathspey - B&S) holds regular networking events that a CNPA representative could provide a presentation to promote this outcome to small Badenoch & Strathspey enterprises. The indicator “the number of tourism businesses involved in active care for the Park’s special qualities” is difficult to measure. All the targets for the indicators are very optimistic and it is not clear how measuring can take place.

OUTCOME 4

The qualities of wildness in the Park will be greater

It is essential that the CNPA takes business interests into account when drawing up local development and management plans. The planning system should work for the local economy as well as for conservation. For tourism businesses in general, conservation is essential to preserving the natural environment that draws in their customers and planning

FSB – Badenoch & Strathspey Branch



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decisions should balance sustainable environmental and economic needs. CNPA have the advantage over other local authorities for the potential for less politically motivated decisions for example.

OUTCOME 6

The economy of the Park will have grown and diversified, drawing on the Park's special qualities

The FSB agrees with growth and diversification of the economy of the Park but in this economic downturn this will be a challenge and "survival" is the current priority within the business sector. The implementation of the Strategy and Action Plan for Sustainable Tourism in the Cairngorms is constructive yet it must be proactively publicised and "sold" to businesses to enable them to understand and engage. Business support and development services using selected exemplars should also be promoted. The FSB B&S Branch can help with this exercise.

The FSB appreciates that across the diverse range and nature of businesses throughout the CNP that a wide range of attitudes and priorities are present. We also strongly commend and support the excellent promotional/marketing work undertaken by the CBP and stress the need for this work to continue if not increase to firmly place the CNP on the world map and emphasise that the CNP is a desirable place to set up and carry on in business.

We know that layers of red tape actively dissuades businesses from developing and growing. There is a clear need to ensure that environmental/conservation red-tape is introduced for the right reasons and that its impact is constantly monitored and reviewed to ensure that it is fit for purpose – that its aims are being met and that it is not inadvertently having a disproportionate impact on local businesses.

The need to improve communications connectivity – particularly broadband and mobile phone speed and coverage is constantly emphasised by the FSB's members. It is of utmost importance that the CNP is properly covered by both as a matter of urgency. The Branch understand that although the Highlands and Islands Enterprise (HIE) has been awarded funding for high speed broadband which will hopefully allow all businesses, including rural areas, throughout the Highlands & Islands to receive broadband, the speed/size is uncertain and not to meet the level currently in the central belt. 3G or 4G has been suggested by many public agencies and private establishments to solve the broadband and mobile issues but sadly as yet no progress.

The lack of local public transport connectivity for residents to travel for personal or work reasons is disappointing considering the fuel cost crisis that the UK faces but in particular the Highlands & Islands. Poor choice of public transport forces individuals to use their personal vehicles at a high cost financially and environmentally. Encouraging walking and cycling is admirable but the distances involved frequently makes these options impossible. Improved public transport is essential.

The shortage of low cost housing continues to be a problem for the retention of our young workforce and to meet the staff needs of some businesses. The FSB recognises that the CNP is a victim of its own success – the more it improves and promotes the Park area the more people it will attract to live here or buy second homes and the higher house prices will rise.

OUTCOME 8

Business and communities will be successfully adapting to a low carbon economy

Since the whole of the UK and indeed the world is faced with the pressing need to create a low carbon economy. The FSB supports this Outcome. Packages of work are currently reaching out to business and communities and need to continue to constantly remind everyone of a low carbon economy and that it is achievable.

FSB – Badenoch & Strathspey Branch



Federation of Small Businesses

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Developing a sustainable local food economy, piloting ways of reducing the energy needs of old buildings with potential funding, a “Quality in Design” programme for future developments and SRDP funding to ensure support will all help.

Businesses are willing to undertake any cost-effective work that saves them money in the long run but rumours of reductions in the new Government inducements like the Renewable Heat Incentive and Feed in Tariffs together with the lengthy admin and set up costs and times has disheartened many.

It is also a concern that companies involved in advising on and fitting these new energy saving technologies are springing up all over the place and that some seem to lack the knowledge to advise properly or deliver what businesses actually require.

The businesses locally that have chosen to go down the energy-saving route and who have presented their cases to the wider community, are commendable. Nevertheless more encouragement, advice, guaranteed funding and a believable illustration of 'saving money' for business is crucial.

The indicators are desirable but we believe the targets are high and unattainable. The CNP population are not likely to seek a low carbon economy without further proof of value and inducement.

OUTCOME 10

The Park's recreation opportunities will have improved health and enjoyment of residents and visitors

For the residents and visitors to experience and enjoy recreational opportunities to improve their health they should also be enriched by Outcome 1 to appreciate the qualities of the Park. The packages detailed to deliver it are based on the expertise and work of public organisations but the FSB believe that private businesses have a key role to ensure these outdoor experiences are promoted and offered to all.

Due to the broad diversity of 'biking' the term “cycling/biking” should be used instead of singular “mountain biking”. There is a large market of cyclists who ride various brands of bicycle and search for different terrain within the CNP and many distinct companies service these clients by virtue of working closely with land based entities.

CONCLUSION

The CNPA in partnership should promote the sustainable economic and social development of the areas communities and this fourth aim is fundamental to achieve the first three which can only be obtained by resilient local communities. All four aims are essential for the CNPP2 to succeed.

The Scottish Government lay priority on the low carbon economy and endorse tourism growth. Public and private sectors, along with communities, must work together to achieve common goals.

Ultimately private business individuals have an expansive range of experience, history and knowledge of operating in CNP and should be consulted on any matter which would affect their activity or location. Business involvement should be at the design of implementation where FSB have innovative ways of gathering business views.

FSB appreciate that to achieve NPP2 a large number of opinions, viewpoints must be considered however for the Cairngorms economic development and diversification strategy, a business viewpoint and intelligence is paramount.

Date: 8th December 2011

Cairngorms National Park Authority
FREEPOST NAT 21454
Grantown-on-Spey
PH26 3BR

Dear Sirs,

RE: Draft Cairngorms National Park Plan 2012 – 2017

We write in response to the National Park Authority's current consultation on the above document and set out our comments below.

Forest Holidays acknowledges and supports the collaborative management approach to the administration of the functions of the National Park, particularly the acknowledgement of the role to be played in achieving aims and objectives by public bodies, private businesses, communities and voluntary organisations. The approach to the formation of the plan on this principle is welcome, particularly the focus on the needs of people and place and the integration for delivery whilst achieving better value for money.

The acceptance to try new approaches is welcome and should be pursued robustly although without breaching the objectives and purposes of the National Park. Such an approach will allow opportunities to be grasped which perhaps could not be realised under the adopted National Park Plan.

The recognition given to the tourism asset and the role it plays, particularly in managing land use, and its importance to both the micro and macro economy is welcomed. The proposed strategic objectives reflect the importance of this sector to the economy whilst seeking to encourage high levels of sustainable tourism. However, we would recommend that better support and emphasis is given to encouraging tourism development and accommodation where it can be achieved without detriment to the special qualities of the Park and the four aims of National Parks.

Turning to Chapter 4, we agree with the focus within the 10 five-year outcomes for the Park and particularly welcome the acknowledgement that, to achieve the strategic objectives of the Draft Plan, it will be necessary for the economy of the Park to have grown and diversified.

To deliver Outcome 1, we support the identified delivery strategy, especially the delivery of the Cairngorms Sustainable Tourism Strategy and CRAGG strategy. Given the identified areas of visitor pressure, updating and delivering these Strategies will be key in delivering an outstanding visitor experience and managing visitor pressures across land ownership boundaries. The Sustainable Tourism Strategy has, as a strategic objective, the growth of the year round tourism offer. This is fully supported by Forest Holidays and will further help achieve the Draft National Park Plan's aims for reducing and managing visitor pressure in areas of high intensity.

In particular, emphasis should be given to re-appraising the role of destination venues and the way in which an outstanding visitor experience is achieved, together with the provision of world class sustainable destinations, thus enhancing the local economy and addressing the lack of employment opportunities. The enhancement of existing and proposed accommodation and service is central to achieving these aims and objectives and should be recognised within the Plan. In this regard, policy direction's 6 and 8 need to be expanded to encourage such an approach.

The Five-Year Outcome 6 aims to grow the value of tourism and better understand and address the expectations and needs of visitors. We agree with this approach and would encourage the trial of new approaches to managing recreation in sensitive environments, as set out in Policy Direction 6, as well as learning from exemplar businesses within the Park that harmonise with the Park's special qualities. Further delivery enhancement of this objective would be to trial a coordinated and managed approach to the growth of destination venues and the services currently and proposed to be provided by the collaborative preparation of planning briefs / development briefs for particular venues, to allow sustainable growth.

We agree with the Key Principle set out in Chapter 5 and welcome the National Park's recognition that to ensure the long-term objective of growing the economy is met, collaborative and coordinated support needs to be given to help providers in producing an outstanding visitor experience, as above. This approach will ensure that multiple benefits are achieved in this sector, provided such an approach is supported in policy.

We trust that our comments will be duly noted in the progression of the Cairngorms National Park Plan and request that we be kept fully informed of the progress of the document.

Yours faithfully,



pp. Adrian W Burn
Head of Planning

Inverness, Ross & Skye Forest District

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**Inbhir Nis, Ros & An t-Eilean Sgitheanach
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Cairngorms National Park Authority
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9 December 2011

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Manaidsear na Sgìre Choille
Forest District Manager
David Jardine

Dear Sir /Madam,

Cairngorms National Park Plan 2012-17 – Comments from Forest Enterprise Scotland

Forest Enterprise Scotland (FES) is the part of Forestry Commission Scotland (FCS) which is responsible for the management of the national forest estate. It is responsible for managing 10 different forests/woodlands across three Forest Districts within the National Park, including areas such as the important woodlands as Cambus O'May, Glen Doll, Glenmore Forest Park, Inshriach, the Laggan woodlands and Pannanich. It welcomes the opportunity to comment on this document.

FES has activity contributed to the delivery of the existing National Park Plan through our programmes of work for the Scottish Forestry strategy which is well aligned to the NP Plan in the delivery of social, environmental and economic outcomes which respect the special qualities of the National Park.

FCS has responded on issues relating to wider woodland/forest management and this response considers the issues which relate specifically to the management of the national forest estate and in particular those which are not specifically related to the management of woodland. Our response is presented within the framework of the NP Plan consultation questions.

Q2 Forest Enterprise Scotland agrees with the description of the special qualities of the National Park, but note that while the appearance of much of the National Park is of wild land, it is in fact managed and if the economic objectives of the NP are to be achieved then sensitive management of land with characteristics of wild land should continue.

Q4 Forest Enterprise Scotland believes that the long-term outcomes meet the diverse needs of the National Park well.

Q5 Forest Enterprise Scotland recognises the importance of the range of five-year outcomes proposed for the NP Plan and believes that in some part FES and the national forest estate has an opportunity to contribute to the delivery of all 10 outcomes; however, in particular, we would wish to identify certain outcomes which may have particular need of attention. Forest Enterprise Scotland also recognises the very close links between many of these outcomes as is indicated below.

Q 9, 12, 13, 14 &16 B,C&D

Outcome 3 The species for which the Cairngorms National Park is most important will be in better conservation status in the Park

Outcome 6 The economy of the Park will have grown and diversifies, drawing on the Park's special qualities

Outcome 7 Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park

Outcome 8 Business and communities will be successfully adapting to a low carbon economy

Outcome 10 The Park's recreation opportunities will have improved the health and enjoyment of residents and visitors

Forest Enterprise Scotland has recently been reviewing the delivery of both the aims of the NP and the Scottish Forestry Strategy at Glenmore Forest Park recognising the key importance of this area within the NP.

This important area for conservation and biodiversity is also an area of very significant visitor pressure and therefore careful integration of approaches is required to ensure that a wide range of objectives are delivered to a high standard and negative effects are minimised. Our recent review has indicated that there is scope for improved delivery to meet both visitor experience and environmental objectives in the area. We believe that a constructive way forward will be a collaborative approach, working with the local community, which develops some detailed spatial planning for the Glenmore area. This will help to integrate the work which has been done at the wider scale in the Glenmore Forest Plan and more detailed work within the built environment to tackle a number of issues which impinge on the quality of the visitor experience eg car parking arrangements.

Forest Enterprise Scotland believe that such an approach is key for this important area in the NP and will contribute significantly to the delivery of Policy Directions 2 and 6 as laid out in the draft NP Plan (Q22 & 26). The approach of looking at the needs of the village area in the context of the wider forest is consistent with the key principle of delivering multiple benefits (Q17). This approach has been at the heart of the management of Glenmore Forest Park for several decades, but this new work is envisaged to ensure that proposals which will take the area for the next half century

are based on sound analysis which will balance all the important objectives for the area.

Forest Enterprise Scotland will include comments on this issue in its response to the Local Plan Main Issues Report and hope that the Cairngorms National Park Authority can include them appropriately within these key documents. If adopted then Forest Enterprise Scotland looks forward to collaborative working with CNPA and the local community to develop a sensitive and robust future for the Glenmore Forest Park.

Other areas of interest in respect of the national forest estate which the National Park Authority may wish to take cognisance of in the development of the National Park Plan are included on the Forestry Commission website:

Renewable energy <http://www.forestry.gov.uk/forestry/infd-6b2jgq>
National Forest Land Scheme <http://www.forestry.gov.uk/forestry/infd-66re5j>

Yours sincerely,

David C Jardine
Forest District Manager

Dear Sir /Madam,

Cairngorms National Park Plan 2012-2017 Consultation 2011- Response form Forestry Commission Scotland (FCS)

This response is submitted on behalf of FCS, Forest Enterprise Scotland (FES) which is responsible for the management of the national forest estate has responded separately.

SECTION 2 The Cairngorms National Park (pages 13-15)

Question 1

What makes the National Park Special to you?

Question 2

Do you agree with these descriptions of the special qualities?

Question 3

Are there other special qualities you think should be explicitly identified in the National Park Plan?

Q2 FCS agrees with the description of the special qualities of the National Park, but note that while the appearance of much of the National Park is of “wildness”, it is in fact managed and if the objectives of the NP are to be achieved then sensitive management of land with characteristics of wild land should continue. Forests are often both managed and perceived as having high levels of “wildness”. For their continued delivery of multiple benefits forests require and can accommodate infrastructure such as roads, fences and visitor facilities.

SECTION 3 Vision and Strategic Objectives (pages 16-22)

Question 4

Do you think the long-term outcomes should be updated and condensed? If so, how?

FCS believes that the long-term outcomes meet the diverse needs of the National Park well.

SECTION 4 What should our focus be for 2012-2017 (pages 23-56)

Question 5

Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

FCS believes that the outcomes are well articulated and provide the necessary focus. FCS is keen to work with the Park Authority to deliver the woodland related outcomes.

Question 6

Which are the most important outcomes to you?

Outcomes 2, 3 and 4 are most important to FCS believes that the long-term outcomes meet the diverse needs of the National Park well.

For each of the 10, five-year outcomes for the Park (pages 26-56):

Questions 7, 8, 9, 10, 11, 12, 13, 14, 15, 16

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and

co-ordination, provide skills and advice, provide money.

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Outcome 2 The quality and connectivity of habitats will have improved, enhancing the landscape at a Park scale.

FCS is supportive of the proposed expansion and management of native woodlands and thinks the indicator of a 5% increase in woodland cover is achievable within the plan period.

It may be helpful to specify particular priority types of woodland expansion for example pinewoods, riparian woods, montane woods and productive farm woods.

It would also be helpful to avoid undue emphasis on only native species being acceptable within the NP for woodland expansion. Well-designed multi-purpose woodland using traditional conifer forestry species (larch/spruce/fir/pine) as well as Scots pine and broadleaves can also deliver this outcome as well as many other benefits as many existing woodlands within the NP testify (but specifically Highland Perthshire, Donside and the Angus Glens). This would be in line with the Cairngorms Forest and Woodland Framework.

Outcome 3 The species for which the Cairngorms National Park is most important will be in better conservation status in the Park.

FCS is supportive of the proposals for improved habitat connectivity at a landscape scale and believe the woodland expansion (both by planting and natural regeneration) set out in Outcome 2 above will make a substantial contribution to this outcome.

Five-year Outcome 4 The qualities of wildness in the Park will be greater.

As noted above whilst the qualities of “wildness” are important FCS believes that it will still require positive land management and intervention in woodlands to deliver the NP outcomes.

SECTION 5 Managing competing demands on the land - Land use strategy
(pages 57-82)

Question 17

Do you agree with the key principle on page 58?

Yes this is fully compatible with the Scottish Forestry Strategy. It may be helpful to think of good land management and design which can encourage this (e.g. integrated management plans).

Question 19

Do you agree with the opportunities and threats identified, if not why?

Question 20

What are the particular opportunities and threats that you think the Plan should address between 2012-2017?

For each of the eight policy directions (pages 67-82):

Questions 21, 22, 23, 24, 25, 26, 27, 28

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

FCS is very supportive of the woodland policy direction and the opportunities and threats identified. FCS would suggest that in addition the use of traditional, but not necessarily native forest species, is recognised as appropriate in some parts of the NP, that thinning is encouraged as a positive management intervention and that the preparation and adoption of long term forest plans are promoted.

A point of detail is that the listed woodfuel policy direction approach may be more appropriate under policy direction 5 as contributing to the low carbon economy.

Yours sincerely

John Risby
Conservator Highland and Islands Conservancy

PARK PLAN OUTCOMES

While the draft plan is commendable in most ways, there are too many questions for voluntary groups to discuss and formulate detailed answers.

We agree the outcomes are worthy of support, but much depends on how the aims are addressed in detail.

In the Grantown area, issues included

- 1) Greater protection for the qualities of wilderness and rare species
- 2) Greater protection for built heritage, sense of place, culture and identity e.g. traditional Strathspey is being undermined by use of "Speyside" or "Spey Valley".
- 3) Greater support for voluntary groups such as Angach Woods Trust, SOS Community Council
- 4) Greater support for wildlife from disturbance (e.g. loose dogs) especially in designated areas by better law enforcement
- 5) Continued support for extension of Strathspey Railway into Grantown, including zoning of Dulicht Bridge area for railway terminus, in Local Plan.

Introduction and Scope

This is HIE's response to the CNPA's consultation on the National Park Plan 2012-17.

Of the ten proposed five year outcomes for the CNPA Plan, HIE's response is focussed on Outcome 6 – *The economy of the Park will have grown and diversified, drawing on the Park's special qualities* - and Outcome 9 – *The Park's communities will be more empowered and able to develop their own models of sustainability*.

Economic Development Strategy

HIE recognises the importance of a strategic plan to develop and diversify the economy of the Park area, and welcomes the proposal from CNPA to develop an iterative 12-month rolling action plan.

The development of an economic strategy should be consultative and collaborative with key stakeholders, and an appropriate Economic Development Forum should be created to bring together the key stakeholders, to develop the contents of the action plan, to monitor progress and review, and to contribute to on-going iterations of the Action Plan.

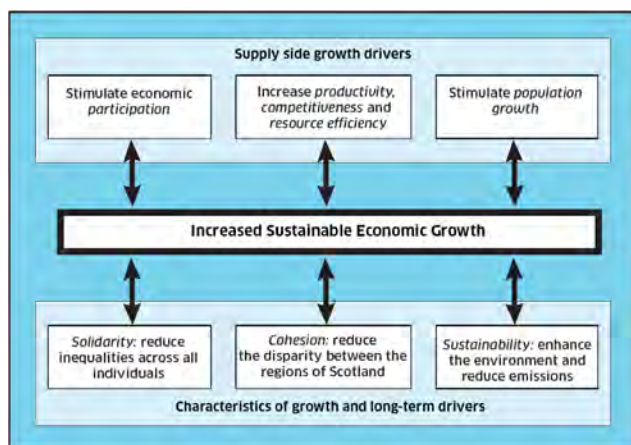
HIE suggests that the key stakeholders for such an economic development forum should be, inter alia, CNPA, CBP, VisitScotland, SE, HIE, and the local authorities within the Park area.

Government Economic Strategy

In developing the strategy, CNPA should pay due regard to the Scottish Government's Economic Strategy (GES).

This sets its Purpose as *"to focus the Government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth."*

GES is the prime and over-riding Economic Development Strategy for all parts of the Scottish Government and Public Services. It sets out Increased Sustainable Economic Growth in terms of supply side growth drivers, and in terms of the characteristics of growth and long-term drivers.



GES sets out the strategic priorities as:

- Supportive Business Environment
- *Transition to a Low Carbon Economy*
- Learning, Skills and Well-being
- Infrastructure Development and Place
- Effective Government
- Equity

With regards to the Supportive Business Environment the areas of focus are:

Growth companies, growth sectors, growth markets

- International trade and investment
- Supporting business growth
- Helping small businesses create jobs
- Growth sectors
- Innovation and commercialisation
- Taxation

Within GES, key areas of emphasis are:-

- Capitalising on the significant opportunities in growth markets from **International Trade**
- A focus on **Jobs**, and, in particular, on actions to provide opportunities for our young people;
- The vital role of **Infrastructure Investment** – and on maximising the impact of our capital spending - to both short and long-term economic performance;
- Action to help **SMEs** create jobs;
- The importance of **Innovation** across all sectors;
- The potential for non-financial levers in **removing obstacles to growth**;
- The role of **Equity** in driving long-term sustainable economic growth;
- A clear articulation of the role for **Growth Sectors**, within the context of the GES setting a framework for providing opportunities for all companies;
- Using **Public Procurement** to maximum effect to promote economic growth;
- The need for greater **Alignment** across the public sector, and a focus on some of the recommendation of the Christie Commission;
- A greater emphasis on **Place** that recognises the unique contribution that every part of Scotland can make, including a focus on the forthcoming Cities Strategy.

Therefore, with regards to GES and the setting of an economic development strategy for the Park, the CNPA should reflect on its ability to support and enhance those areas of activity that can provide the above, and be cognisant of the role of other Agencies, notably HIE, SE, SDI and VisitScotland, and the critical role of the Private Sector in achieving these aims within the Park's area.

Key Growth Sectors - Tourism

Recognising the emphasis on growth sectors, HIE provides comment on Tourism in particular, given its dominant role within the Park area's economy.

The Strategy & Action plan within the Park needs to look at the wider Destination, and the linkages with bordering or nearby Destinations. It is important that the perspective is from that of the customer, the visitor to the Park Area.

Consideration needs to be given to working with the key organisations to ensure that the Park's Tourism Product is fit for purpose, and current. Clearly, a key strength is the natural aspects to the National Park, both in terms of the geography and landscape, but also in terms of the natural environment and wildlife. Whilst there may be improvements to access to these aspects of the Park's Tourism appeal, it is to the built environment and the businesses and organisations that operate within the Park Area that attention needs to be focussed to ensure that they are as complete as is required, and that the Tourism offering to the tourist visitor is of a suitable quality.

In this area of the economy in particular, it will be important for CNPA to work closely with VisitScotland, HIE and Scottish Enterprise to develop that aspect of the strategy and action plan with the CBP, on behalf of the Private Sector.

In doing so, it is important that attention is provided to metrics to measure the impact that will be made, which would also need an economic base line from which to measure the difference that has been made.

Key Growth Sectors - Others

The economy of the park is not homogenous, and whilst Tourism dominates, attention should be provided within the proposed strategy to other key sectors.

Within GES, these are Food & Drink; Energy; Life Sciences; Creative Industries and Financial and Businesses Services. All of these are found within the Park Area.

Inward Investment

The high quality of life that the Park affords should not be understated, and there is scope for a cogent sub-strand of the Park's Economic Development Strategy that identifies the methodology by which the area's strengths can be articulated, and matching opportunities identified. From this, a strategy and iterative action plan for inward investment – probably micro-inward investment – could be developed around intelligent, focussed and targeted PR & use of marketing communications.

Enabling Infrastructure

Three key pieces of enabling infrastructure are considered important.

One is the provision of suitable and appropriate housing for the Park's workforce, existing and new. An economic development strategy cannot exist in isolation, and due regard to other nascent or emerged strategies that support all ten of the Park's objectives should be considered in due course, in terms of how they are mutually supportive and synergistic.

Second is the provision of suitable and appropriate business premises, both to enable the expansion of existing businesses, and also to house inward investment.

The CNPA should consider how it works with the Private Sector and relevant Public Sector agencies to deliver an action plan on the above.

In addition, both to support Tourism, but as a general piece of enabling economic development infrastructure, the CNPA should consider how the Area's ICT infrastructure is fit for purpose, and ideally future-proofed. This is likely to be a mix of both cable-based and mobile-based technologies and infrastructure. An improved ICT infrastructure will be important for attracting in micro-inward investment, whereas an improved mobile ICT infrastructure will build on the strengths and successes of promotional web-based products for the tourism sector within the Park area.

Community Development

HIE recognises that strong communities contribute significantly to the deliver of sustainable economic growth, particularly in remote, sparsely populated areas.

CNPA should consider the role of Social Enterprises, which are increasingly seen as important in contributing to economic and social growth in Scotland, addressing in particular the cohesion, solidarity and sustainability components of the Government Economic Strategy.

For example, HIE's support of social enterprise will grow their impact by assisting:

- Individual social enterprise to acquire and manage income-generating assets and to build their capacity to create and grow business activity.
- The whole social enterprise sector through networking and generic support.
- Sector development including community benefit from renewable energy; community broadband; home working; rural tele-healthcare; recycling and low carbon initiatives.

Summary

HIE welcomes the opportunity to provide comment, and looks forward to playing a supportive and participatory role in the iterative action plans of the CNPA.



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our ref: AMN/25/51
CMS ref: 201105510

8 December 2011

Dear Mr Miles

**Cairngorms National Park Authority
Draft national park plan 2012 – 2017**

Thank you for consulting Historic Scotland on the above draft plan. We have also received a consultation on the Strategic Environmental Assessment (SEA) Environmental Report (ER) which accompanies the plan and will submit our response via the Scottish Government's SEA Gateway in due course.

I understand that the draft National Park Plan sets the framework for those involved in the management of the National Park and that it identifies the targets and outcomes for other public bodies involved in the management of the National Park. On the whole, we welcome the recognition of the contribution of the cultural heritage of the park area to the special qualities of the National Park. However, there are some areas where this could be strengthened, particularly in the policies the Cairngorms National Park authority (CNPA) proposes to take. The comments in this letter follow the order in which the issues are identified in the draft National Park Plan.

Vision and strategic objectives

We note the vision and strategic objectives for the park which are set out on page 16. We welcome that the draft plan identifies the conservation and enhancement of the cultural heritage of the park as such an objective and note the progress made to date on achieving this objective.

Focus for 2012 - 2017

In relation to the focus for the period from 2012 – 2017, we note and welcome the inclusion of specific objectives for the historic environment. It is not clear from the draft plan how CNPA envisages that Historic Scotland can help in the delivery of five year outcome 1. We consider that discussion of our potential involvement would be beneficial prior to the publication of the finalised plan.





I note that one of the packages of work identified for five year out come 2 identifies potential woodland and wetland expansion proposals. As you may be aware, such proposals may also have an impact on the historic environment. Any such proposals should not also have a detrimental impact on the historic environment. We would welcome the opportunity to work more closely with the CNPA on objective 7.

Managing competing demands on the land

In addition to identifying the key principle to guide land use decisions within CNPA's area, this chapter of the draft plan identifies a number of strengths, opportunities, threats and weaknesses to the broad habitat types identified. We note the issues identified for some of the habitat types and the summary of cross cutting threats on page 66. In addition to those identified in the draft plan, the issues of the potential erosion or loss of heritage assets as a result of inappropriate development could be added to this list.

Proposed policies

We note the 8 policies set out on pages 67 – 81. In light of the aims of the national park and the objectives set out in the draft plan, it is disappointing that the National Park Plan does not make any policy provision for the cultural heritage. A number of the policies discussed in the plan have the potential to have an adverse impact on heritage assets, particularly policy 3 to expand and enhance woodland cover and the policy approach to enhancing vegetation cover as set out in policy 4 to enhance the resilience of habitats and land use to climate change. Any such proposals coming forward under these policies would require careful consideration to ensure that no damage to heritage assets occurs.

I hope this letter has been helpful to you.

Yours sincerely

Adele Shaw
Environmental Impact Assessment Team Leader

Dear Sir / Madam,

Please find attached a copy of the John **Muir Trust's response to the consultation on the Draft Cairngorms National Park Plan for 2012 — 2017,**

The John Muir Trust remains supportive of the work the Cairngorms National Park Authority carries out, and I hope that this is reflected in the responses provided to the consultation questions. In particular, we look forward to continuing the longstanding arrangement with the Authority to deliver the John Muir Award across the Cairngorms.

The Trust has not provided a response to every question, particularly where there is broad agreement with the aims but where we have nothing constructive or meaningful to add to the points made.

I apologise for responding after the deadline has passed, but the storms experienced across Scotland on Thursday were responsible for a power cut in Pitlochry that knocked out our server. As this did not come back online until this morning, we were unable to finalise our response before this time. I appreciate the short extension that was provided on Friday when I called requesting one.

Should there be any problems with any part of this response, please **let me** know.

Thanks once again,

Steven Turnbull
Policy Officer

John Muir Trust

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The John Muir Trust is the leading wild land conservation charity in the UK, working to protect wild land and wild places. [Join us](#)

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Steven Turnbull
Policy Officer
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12 December 2011

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Dear Sir / Madam,

Response to the Draft Cairngorms National Park Plan 2012 — 2017

The John Muir Trust is the leading wild land conservation charity in the United Kingdom. Working with people and communities to conserve, campaign and inspire, the Trust is a membership organisation that seeks to ensure that wild land is protected and that wild places are valued by and for everyone.

The Trust recognises the importance of delivering the outcomes and policies set out in the consultation document, in particular, the delivery of the John Muir Award to support recreation and outdoor learning opportunities. The continued delivery of the John Muir Award in the Cairngorms through the existing partnership agreement with the Cairngorms National Park Authority has been extremely beneficial, and we look forward to continuing this arrangement throughout Draft National Park Plan 2012 — 2017.

The Trust is pleased to see recognition of the importance of protecting wild land, of managing and restoring peatlands and woodlands as valuable carbon stores, of promoting outdoor learning and of empowering communities.

However, we are somewhat disappointed that the Plan makes no reference to plans to commemorate John Muir's life in 2014, which would highlight the considerable role he had to play in developing conservation and environmental thinking, which in turn led to the development of the National Park system as we know it today.

The John Muir Trust looks forward to working with the National Park Authority in the development of strategies, policies, guidance and advice as it relates to wild land, wild places and wildness, as well as continuing to develop existing working relationships.

Should there be any problems with the content of this response, please let me know directly.

Yours sincerely

Steven Turnbull
Policy Officer

SENT BY EMAIL

RESPONSE TO QUESTION 4

Do you think the long-term outcomes should be updated and condensed?

In terms of updating the long-term outcomes from the first National Park Plan, the Trust believes that, despite the introduction of new strategies, policies and guidance at national, regional and local levels, the original outcomes remain relevant and cover the essential elements the Cairngorms National Park should be concerned with over the period 2012 to 2017, and beyond.

in terms of condensing the outcomes listed on pages 17 and 18, while the Trust acknowledges that such an exercise might simplify the overall Plan somewhat, it would also diminish the quality of the information provided. However, the section on long-term outcomes could benefit from the introduction of short, summary paragraphs under each heading, to provide a narrative description of the overall intentions of each.

If the provision of an introductory paragraph provides an opportunity for clarity and for specific, detailed information contained in the bullet points in other parts of the Plan, to simplify the overall document, this may lead to an improvement in the overall presentation of the Plan.

RESPONSE TO QUESTION 5

Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is important?

The John Muir Trust agrees that the five-year outcomes identified on page 23 of the consultation document are focussed towards the right areas of activity for improving and enhancing the Cairngorms National Park. They appear to cover the key areas of development, and are both generic and specific enough to allow both traditional and innovative approaches to be adopted and promoted.

RESPONSE TO QUESTION 6

Which are the most important outcomes to you?

There are five outcomes identified on page 23 of the consultation document that correspond closely with the key aims and objectives of the John Muir Trust, and in particular, through the continued delivery of the John Muir Award in the Cairngorms through the existing partnership agreement. The Trust values this longstanding agreement with the Cairngorms National Park Authority, and very much welcomes its intended continuation

The most important outcomes could be identified as those relating to wildness (Outcome 4), habitats (Outcome 2) and recreation (Outcome 10). However, the Trust also recognises the important role that land owners, land managers and local communities have to play in shaping the development of the National Park over the next five years. We are therefore supportive of the outcomes relating to programmes of advice (Outcome 5) and empowered communities (Outcome 9).

RESPONSE TO QUESTION 7

Do you agree that five-year Outcome 1 is an appropriate one for this National Park Plan to 2017?

The John Muir Trust agrees with the overarching outcome, and wishes to acknowledge the achievements of those undertaking the John Muir Award within the National Park and the contribution the Park Plan 2007 — 2012 has played in promoting awareness, understanding and involvement with the Park's natural and cultural heritage.

The John Muir Award is a particularly useful way of delivering some of the priorities for action relating to visitor experience. It is referenced as a means to recognise achievement and attainment in Learning and Teaching Scotland's "Curriculum for Excellence through Outdoor Learning" document. The finalised Park Plan will also cover the 10th anniversary in 2013 of formal working arrangements between the John Muir Trust and the Cairngorms National Park to jointly manage the John Muir Award in the Cairngorms.

However, we are slightly disappointed that there has been no recognition of the life of John Muir himself identified within the draft consultation document. The centennial anniversary of his passing occurs in 2014, and this would have been an ideal opportunity to organise celebrations on the role Muir played in establishing the modern National Park system in the United States, and also from the potential impact it could have in terms of visitor numbers to the area — particularly given the other notable events taking place in Scotland throughout the same year, e.g. the Commonwealth Games in Glasgow, the Ryder Cup, the second year of homecoming, etc.

Muir's writings on and perspective of the natural world around us are as relevant today as they were a century or more ago. However, he remains largely unknown in his homeland and this represents a missed opportunity to deliver increased awareness of the National Park in both a regional and national context.

RESPONSE TO QUESTION 8

Do you agree that five-year Outcome 2 is an appropriate one for this National Park Plan to 2017?

As a wild land conservation charity, the John Muir Trust seeks to ensure that wild land and wild places are protected and enhanced both for their intrinsic value and their benefits to humans. Wild land provides many benefits to modern society, from peat bogs that sequester carbon to flood prevention measures — natural forms of mitigation against the impacts of climate change, as well as offering areas with unusual and rare biodiversity.

When compared to other forms of carbon management, peatland and woodland restoration is more cost-effective — if the UK government committed the same financial support to peatland restoration as it does to promoting the production of biofuels, it could potentially result in the offset of around 37% of all CO₂ emissions in the UK.

The Government-commissioned Lawton review of wildlife sites in England, which points to the inadequacy of the sites system and, in the context of climate change and declining ecological indicators, suggests that a failure to meet international obligations requires a 'step-change in our approach to wildlife conservation, from trying to hang-on to what we have, to one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services, for the benefits of both people and wildlife'.

Much of Lawton's arguments support the need to address wild land protection in a similarly bold fashion, and highlight the need to raise the profile of landscape protection across the UK. Where we might make a connection with the Lawton work is to bring the concepts of wildlife and landscapes together. After all, wildlife lives in landscapes and some of our most charismatic and important species and habitats - such as the golden eagle, wild cat, red deer, blanket bogs, pine woods and mountains — exist or are dependent on our wildest and least-developed areas.

Nature is more resilient (to climate change, for instance) where it has room to adapt and move, and where natural ecological processes are allowed to prevail with minimal human intervention. As such, the creation of large ecologically connected areas and networks are now being seen as a solution to conserve and restore our native biodiversity.

The Trust is pleased to note acknowledgement of the importance of protecting the quality and connectivity of habitats, and that these form a key part of the landscape of the National Park and are not a separate issue. We are therefore pleased to see inclusion of Outcome 2 in the National Park Plan for the forthcoming period.

RESPONSE TO QUESTION 10

Do you agree that five-year Outcome 4 is an appropriate one for this National Park Plan to 2017?

The Trust welcomes the commitment made to protect the relative wildness of the National Park.

The importance of wild land is recognised in Scottish Planning Policy, paragraph 128: "The most sensitive landscapes may have little or no capacity to accept new development. Areas of wild land character in some of Scotland's remoter upland, mountain and coastal areas are very sensitive to any form of development or intrusive human activity and planning authorities should safeguard the character of these areas in the development plan."

Further to this, Paragraph 99 of the National Planning Framework 2 states that: "Some of Scotland's remoter mountain and coastal areas possess an elemental quality from which many people derive psychological and spiritual benefits. Such areas are very sensitive to any form of development or intrusive human activity and great care should be taken to safeguard their wild land character."

Wild land is increasingly becoming recognised as an internationally important resource. The threat to wild land from inappropriate development is of significant concern to the Trust, and the National Park Authority is to be congratulated for the work undertaken so far to identify the key wild land characteristics of the Park, to map areas of relative wildness and produce supplementary guidance to support the planning system within the National Park area.

With this in mind, the John Muir Trust will continue to support the work of the National Park Authority in developing strategies, policy, guidance and advice with regards wildness and wild land within the National Park area.

RESPONSE TO QUESTION 11

Do you agree that five-year Outcome 5 is an appropriate one for this National Park Plan to 2017?

The John Muir Trust recognises that land management forms an essential part of the way that land within the Park is managed, and how many of the important benefits identified in other Outcomes or Policies within the Park Plan are delivered. However, in the absence of clear and appropriate support and advice for land managers, this can lead to potential conflicts of interest, particularly where environmental and economic opportunities are at odds with one another.

The Trust welcomes the identification of opportunities to deliver targeted, focussed programmes of advice and support for land managers in the Park. This can help to alleviate some conflicts of interest and provides a degree of transparency and confidence that matters across the Park area will be dealt with in a consistent manner. It also enables innovative development approaches to be effectively supported, and for the results to be promulgated to other interested parties both within and outwith the Park.

RESPONSE TO QUESTION 17

Do you agree that five-year Outcome 7 is an appropriate one for this National Park Plan to 2017?

The Trust welcomes the inclusion of the statement that *"New development is designed and sited in ways that retain and enhance the sense of place and Cairngorms identity."* It is important to remember that while delivering new settlements and built development is essential to delivering healthy communities within the Park, such development should not occur where it would negatively affect the special qualities of the Park, including its wild land, landscape and countryside attributes. However, this does not limit the potential for housing and such like to be delivered within existing settlements, maximising local opportunities while minimising local impacts and / or encroachment into potential sensitive or productive areas of land.

RESPONSE TO QUESTION 15

Do you agree that five-year Outcome 9 is an appropriate one for this National Park Plan to 2017?

The Trust broadly welcomes the empowerment of local communities, particularly when it comes to becoming more sustainable, and is pleased to see recognition of the role that business and communities have in delivering a low carbon economy (Outcome 8).

However, we are somewhat concerned that Outcome 9 as defined in the draft Park Plan may present conflicts with some of the aims of other Outcomes, particularly in relation to the potential for communities to develop and implement projects, and to generate income and maintain the facilities and services they want. This could potentially provide a back-door for larger scale development to occur, particularly with regards to renewable energy developments.

Perhaps the wording for this Outcome could be amended to reflect this, and to address potential interdependencies with other Outcomes listed in the Park Plan that could have an impact on the delivery of key objectives?

RESPONSE TO QUESTION 16

Do you agree that five-year Outcome 10 is an appropriate one for this National Park Plan to 2017?

The John Muir Trust broadly agrees with the aims of Outcome 10, welcoming recognition of the importance of the physical and mental wellbeing of residents and visitors to the Park. Providing the opportunities for more people to enjoy the National Park is important, but this should not occur at the expense of many of the other special qualities identified — this would be counter-productive and could result in either a reduction in visitor numbers to particular areas as a result, or a loss of habitat connectivity as more and more people visit and have an impact on an area.

As noted previously, the Trust values its longstanding agreement with the Cairngorms National Park Authority to manage the John Muir Award on a partnership basis in the Cairngorms, and very much welcomes its intended continuation. This has proved to be of influence across National Parks throughout the UK.

The Trust would also refer to its response to Question 7, highlighting the potential opportunities surrounding the commemoration of John Muir's death, the various international sporting events occurring in Scotland in 2014, and other events of note that could result in an increase in the number of people wanting to visit the Cairngorms National Park.

RESPONSE TO QUESTION 17

Do you agree with the key principle on page 58?

The John Muir Trust believes that there is a need for better protection measures for Scotland's landscape and, in particular, its remaining wild land and wild places, for the benefit of present and future generations. The Trust also believes that Scotland's National Parks are uniquely placed to deliver the changes necessary to achieve this goal, given their responsibility to give greater weight to conserving and enhancing natural and cultural heritage when exercising their functions.

The principle identified on Page 58 of the Draft National Park Plan indicates that the Park Authority recognises the importance of the environment to delivering the four aims, and the links it has to successfully achieving the other key principles, which in turn seek to ensure an open and collaborative approach to delivering social, economic and environmental benefits locally and to the wider nation.

The Trust would also refer to the potential opportunities that exist within Scotland's Land Use Strategy to deliver multiple land uses within the Park.

RESPONSE TO QUESTION 20

What are the particular opportunities and threats that you think the Plan should address between 2012 and 2017?

In addition to protection for wild land and wildness qualities within the National Park, the John Muir Trust considers it important that the opportunities and threats associated with habitat connectivity / fragmentation and balanced land uses should be addressed between 2012 and 2017.

RESPONSE TO QUESTION 25

Do you agree with the proposed approach?

The John Muir Trust broadly agrees with the policy approach and implications identified for Policy Direction 5. We would urge caution, however, in the wording of the final policy relating to low impact energy generation, particularly with regards to scale and windfarms.

The final policy document should certainly have a presumption against larger community or industrial-scale windfarm developments, e.g. more than 5 turbines in one location, hub height greater than 30 metres, etc. But it should not necessarily restrict all windfarm developments — this may not be prudent given current Scottish Government guidance, nor practical given the potential of some sites within the National Park to support small-scale, sensitively-sited community schemes.

RESPONSE TO QUESTION 28

Do you agree with the proposed approach?

The John Muir Trust generally agrees with the approaches and implications identified for Policy direction 8, but once again urges caution to ensure that the aspiration is 'sustainable development' and not necessarily 'sustainable economic growth'.

In practical policy and decision-making terms, sustainable development recognises the inter-dependencies between economic development, environmental protection and social inclusion. Sustainable economic growth, on the other hand, refers to a sustained period of low inflationary growth that avoids periods of economic boom and bust. And while this can lead to social and environmental benefits, they are by-and-large secondary to economic considerations.

Developers, governments and other agencies may try to justify major developments in wild land areas under the guise of "sustainable economic growth" but it is wrong to label a development "sustainable" if there is an unacceptable, negative impact on the environment.

The John Muir Trust does not believe that the protection of the environment should be "traded" or "balanced" against economic development objectives when viable and genuinely sustainable alternatives exist that do not cause damage to wild land. Moreover, there is increasing evidence that wild land contributes uniquely and very positively to our economy.

ENDS

Kincraig & Vicinity Community Council

Autumn 2011 Consultation on CNPA National Park & Local Development Plans

Personal thoughts from John Anderson, Kincraig.

Introduction:

Further to receipt of the CNPA 'Your View' leaflet outlining 10 'Proposals' for the 2012-17 Park Plan and 8 'Main Issues' identified for the Local Development Plan review, respond *on a personal basis* as follows, having had access to the Community Council 'hard copy' of the Plans and their supporting material.

There are 4 volumes relating to the Draft (Cairngorms) National Park Plan:

(Pages)

The Draft National Park Plan itself 115

Plus Background Evidence:

Strategic Environmental Assessment — Environmental Report 76

Habitats Regulations Assessment 36

Equality Impact Assessment 6

And 11 volumes relating to the Draft Local Development Plan, 7 of them *Background Evidence (but note the (longer) duplications)*:

Main Issues Report 115

Strategic Environmental Assessment — Environmental Report 104

Habitats Regulations Assessment 54

Equality Impact Assessment 6

Background Evidence:

1. Housing & Population (includes related statistics, plus 'Mechanisms employed in Scottish Authorities & by National Parks in E&W) 306

2. Economy 137

3. Monitoring Report 67

4. Other Information (including 'Community Statements' & Comments from Statutory Bodies) 45

5. Site Analysis — Part 1 144

Site Analysis — Part 2 — Appendix 1 — Habitat Surveys 403

Site Analysis — Part 3 — Appendix 2 — Landscape Surveys 130

Personal thoughts:

1) *There are three volumes which largely duplicate each other in the two different plans* (shown in *italics* in the listing above — *Strategic Environmental Assessment — Environmental Report, Habitats Regulations Assessment and the Equality Impact Assessment*. Notably those (the first two) in the Local Development Plan group, are longer than those in the National Park Plan set. While accepting that the contexts are somewhat different, I question whether these are sufficiently different to justify two versions. Better to have just one point of reference, I would have thought. I also wonder why the *Equality Impact Assessment* is here at all, as this is a national requirement and not to my mind, a specifically Park or Development Plan issue.

It is also noteworthy that the 'Proposals' for the National Park Plan summarised in the 'Your View' leaflet run to 10, but only 8 'Main Issues' are identified for the Local Development Plan, despite the considerably greater volume of supporting material.

2) Regarding the Park Plan, I suggest that this should clearly establish the principles necessary for the Park to achieve its 'Vision'. The questions then arise 'Are the principles embedded in the Park Plan clear enough to enable the Plan to achieve this objective? Some concerns arise:

3) *The CNPA is strikingly ambivalent in its approach to 'Proposals' 4 & 8 in the leaflet as regards Renewable Energy & Economic Activity.* While I respect the concerns of those who appreciate the 'wildness' aspect of the National Park, the majority of people living and working in the Park are not that distressed about having wind farms in the vicinity of the Park, as evidenced by npower renewables sending out 2,500 leaflets to residents inviting comment for the proposed Allt Duine wind farm north of Kincaig, but only receiving 150 or so replies.

I have to say that while accepting that national parks are special, it does worry me that so often we expect others to bear the responsibility for putting up with developments in their back yards for our benefit. In the Park's case, the wind farms are outwith the boundary of the park even if visible — in the Allt Duine case only just and very largely set against the hills behind and rarely breaking the skyline — so in this case your lack of support is, in my view misplaced, given that it is out of sight to the majority of people and well away from any houses. In no way does it compare with the Lochindorb situation in terms of visibility.

Assuming that renewable generation technology will improve over the next 25 or so years, the likes of the Allt Duine scheme can eventually be taken down to leave little trace of its ever having been there. In the meantime, we have a national generation shortfall and the Park needs to shoulder its share of the burden to help bridge the gap.

4) *Proposal 5* needs to be more supportive *of farming and in particular the protection of areas of existing 'ploughable' land* which contributes so much to the look of the Park. The ploughable areas have taken many years of hard physical effort by our forebears to create and are as much part of our cultural heritage as the hills themselves. We may well need them for food production in the years to come.

'Enhancement of the landscape' is easily said, but not enough thought appears to have been given to how to handle the felling of the large tracts of commercial timber now at or approaching their fell-by' date, while still retaining the 'pleasing' look of the area — extensive tracts of cleared ground are not a pretty sight. This necessary need to fell will clearly also delay the achievement of the Scottish Government's target of 25% tree cover by 2050, as the areas will need to be replanted — and much more besides — before real progress can be made to meeting the 'carbon capture' objective set in response to the challenges raised by climate change.

Where the extra land suitable for trees would come from then comes into play, as we struggle to find the best balance for land use. There is a map (page 73 of the Park Plan), which shows 'Native woodland potential'. This 'potential' covers the entire 'in-bye' land in the Park, challenging its present use for farming, sporting activities, much of the forestry and, of course, the built infrastructure associated with our being resident here. Felling and replanting / new planting must therefore be very carefully managed — if in fact the targets can or should be met at all — while maintaining the all-important vistas etc., essential to the established character of the Park and hence its economic future largely based as it is on tourism and recreational activities. Nor should we forget the part played by the traditional land-using industries in making the Park an attractive place to visit.

5) Regarding the Development Plan, the most significant issue is the provision of *affordable housing alluded to in Main Issues 1, 3, 4, 5 & 6.* The background provided in the *Housing & Population support document* provides much relevant detail including useful material regarding the different approaches to the problem in other Scottish Local Authorities, the Loch Lomond & the Trossachs National Park and national parks in E&W. It is acknowledged that this is a very tricky area to get right and one which all authorities are struggling to achieve. However, *development must firstly reflect local demand and, in the context of maintenance of character, be only incremental without domination of existing settlements. In this regard, more effort should be made to establishing new settlements of say 40-50 homes in accessible to public transport and other services, but currently forested.*

We have also very recently become aware of the letter from Jim Mackinnon, Director & Chief Planner relating to *'Occupancy Restrictions and Rural Housing'* and dated 4 November 2011. Kincaig & Vicinity CC specifically asked for *Section 75 Agreements* to be rarely used when responding to the original Local Development Plan consultation. I suggest that Mr MacKinnon's letter could usefully be included verbatim in its entirety as it spells out his recommendation very clearly and succinctly.

6) Discrepancy. The above supporting document includes an *Appendix 4* which is entitled *'Delivering housing for local need — a review'*. *Paragraph 4.3* refers to the four statutory aims of the National Parks in Scotland, reminding the reader that *'if it appears that if there is conflict between the first aim, the conservation and enhancement of the natural and cultural heritage, and any of the others, greater weight must be given to the first aim'*. *Paragraph 7.4* however includes the comment that with regard to their statutory purpose, the position in Scotland is different from that in the English & Welsh National Parks, in that in the Scottish National Parks *'the promotion of sustainable economic and social development of the area's*

communities carries equal weight'. While one suspects that many in the Cairngorms National Park would agree with the latter situation, sadly it seems likely that revision will have to be made given what the Act establishing the Park actually says.

7) Finally, I remain seriously irritated by references to the *ancient woodland inventory* where this results in areas which have been planted to commercial forestry. perhaps several times over in the last 200 years, still being barred for consideration for other purposes, largely on the basis of a 'desk-bound' analysis. If we follow that line of argument to its logical conclusion, we should remember that the entire Park has seen many changes in natural vegetation cover since the ice age, including genuinely ancient woodland, such that none of us should be here today! We are where we are, and this anomaly should be revisited.

LAGGAN COMMUNITY ASSOCIATION

Founded 1972. SCVO Constitution 1974 Charitable Status 1998 Charitable No. SC 027586

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Laggan Community Association
Community Office
Laggan
Newtonmore
PH20 1AH

9th December 2011

The opinions gathered by Laggan Community Association on the national and local development plan and are as follows: -

- No planning condition should inhibit the building of houses for local families, this is especially important now given the recommendation over section 75 from the Scottish Parliament.
- No areas should be zoned for housing developments
- No zoning at all
- The placement of houses already present should be maintained ie dispersed settlements
- 1 1/2 storeys should be redefined and not a prerequisite of planning permission.
- Importance placed on retention of all amenities ie shop, school, doctors
- Essential need of public transport provision
- Need for help for small business
- Bias towards business and groups with funding from CNPA should be avoided, especially within the 'statement' for Living in Laggan. Why? For example does Wolfax have a mention when the pottery coffee shop which welcomed 18,000 visitors alone this year, doesn't? There are several well establish business in the area who ALL contribute to making Laggan a special place to visit none should be singled out.

We would like to note that the slow, unreliable broadband connection and lack of any internet connection to some properties has made the filling out of the online survey impossible. This is a huge oversight and increases the chance of bias towards other communities who are able to respond this way.

We should like to have noted that lack of response online from Laggan should not be misconstrued as lack of interest, we would draw your attention to the meeting held in Newtonmore 5/10/11 when Laggan was very well represented and made up half the group formed.

Draft Cairngorms National Park Plan Review – Comments on behalf of Mar Estate

1.0 Introduction - Draft Cairngorms National Park Plan 2012 - 2017

This report represents the view of the Mar Estate on the Draft Cairngorms National Park Plan 2012 to 2017. It has been prepared on their behalf by Halliday Fraser Munro and concentrates on key issues for discussion. The consultation document sets out a number of specific questions. These have been numbered in this response in exactly the same manner as the Draft Park Plan consultation documents:

2.0 SECTION 2 - The Cairngorms National Park (pages 13-15)

This section sets out the history and aims of the National Park stating the four aims set out by the National Parks (Scotland) Act 2000 and that these should be achieved collectively (delivering all four aims):

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of natural resources of the area;
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
- To promote sustainable economic and social development of the area's communities.

It states that where there is a conflict between these aims it is the first aim that is considered to have greater weight.

"The National Park Plan sets the direction and framework for all those involved in contributing to the management and success of these special areas. The plans should set clear targets and outcomes to which all relevant public bodies and other partners commit to delivering." (Page 10).

Park plans effectively operate as the strategic context for development planning in the National Park and are a material consideration in determining planning applications.

Section 2 of the Plan identifies special qualities of the Park and organises these into four key themes:

1. The huge granite mountains and how they have shaped the natural heritage, people, landscapes and culture around them;
2. Its unique mosaic of habitats of exceptional quality, size and scale;
3. Its rich cultural landscape separated into distinct geographical identities and traditions by the bulk of the mountains (The Park is a place of "mountain folk" and "forest folk");
4. Its sense of wildness and space at its heart, inspiring passion in those who live there and those who visit.

Table 2.1 identifies and describes the special qualities of the park – see below.

DRAFT Cairngorms National Park Plan 2012-2017

The Mountains and Plateaux	<ul style="list-style-type: none"> • The unifying presence of the central mountains • An imposing massif of strong dramatic character • The unique plateaux of vast scale, distinctive landforms and exposed boulder-strewn high ground • The surrounding hills • The drama of deep corries • Exceptional glacial landforms • Snowscapes
Moorlands	<ul style="list-style-type: none"> • Extensive moorland, linking the farmland, woodland and the high tops • A patchwork of muirburn
Glens and Straths	<ul style="list-style-type: none"> • Steep glens and high passes • Broad farmed straths • Renowned rivers • Beautiful lochs
Trees, Woods and Forests	<ul style="list-style-type: none"> • Dark and venerable pine forest • Light and airy birch woods • Parkland and policy woodlands • Long association with forestry
Wildlife and Nature	<ul style="list-style-type: none"> • Dominance of natural landforms • Extensive tracts of natural vegetation • Association with iconic animals • Wildness
Visual and Sensory Qualities	<ul style="list-style-type: none"> • Layers of receding ridge lines • Grand panoramas and framed views • A landscape of many colours • Dark skies • Attractive and contrasting textures • The dominance of natural sounds
Culture and History	<ul style="list-style-type: none"> • Distinctive planned towns • Vernacular stone buildings • Dramatic historical routes • The wistfulness of abandoned settlements • Focal cultural landmarks of castles, distilleries • The Royal connection
Recreation	<ul style="list-style-type: none"> • A landscape of opportunities • Spirituality

↑
also a visual
and sensory
quality.

Source: The Special Landscape Qualities of the Cairngorms National Park; Scottish Natural Heritage; Commissioned Report No. 375

RESPONSE

Table 2.1 has a significant landscape bias suggesting that the towns and buildings only fall under the “Culture and History” banner. The towns, villages and individual buildings and how they sit within the landscape are key to the visual character of the Park. Table 2.1 should recognise the visual impact of how towns sit within the landscape and contribute to the visual quality of the Park more fully.

The three specific questions on this section are shown below.

- Question 1) What makes the National Park special to you? – *see below*
- Question 2) Do you agree with these descriptions of the special qualities?
In general but the contribution of settlements to the visual qualities and other qualities of the Park have been underplayed.
- Question 3) Are there other special qualities you think should be explicitly identified?
The people. Much has been said about the landscape but the people of the Park also add to its special qualities. Although dealt with more fully in the LDP the issue of sustainable economy is also important in creating a Park with special qualities supported by thriving communities. This inevitably means more development to meet modern needs and support local businesses.

3.0 SECTION 3 - Vision and Strategic Objectives (pages 16-22)

This section sets out the vision for the Park as:

“An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together.” (p.16)

This, we believe, is a good balanced vision for the Park as it covers not just the land but those who live and work there. The long-term outcomes are that the Park:

- **Is a special place** (landscape conserved and enhanced, sense of wildness enhanced but enjoyed by many, retain a rich biodiversity, recognise the geodiversity, active and productive land management, safeguard the built heritage and encourage good design, record archaeological evidence and community cultures and traditions are recognised and continue to evolve);
- **Has a sustainable economy** (thriving and sustainable communities, opportunities for the people of the Park to develop skills and employment options, businesses will thrive, the environment will stimulate economic activity, integral social & economic & environmental; sustainability, ability to access housing, a leader in sustainable rural transport, and a vibrant renewable energy, recycling and waste sector); and
- **An outstanding visitor experience** (internationally recognised world class sustainable tourism destination, integrated network of routes to enjoy outdoor access, increased range of outdoor recreation, high understanding of responsible behaviour, and knowledge gaps will be addressed to allow the Park to lead the way on issues such as sustainable development and rural tourism).

RESPONSE

- Question 4) Do you think the long-term outcomes should be updated and condensed? If so, how?
In general the long-term outcomes seem to be reasonable.

4.0 SECTION 4 - What should our focus be for 2012 –2017 (pages 23 – 56)

The consultation document sets out ten 5-year outcomes for the Park:

1. More people will learn about, enjoy and help conserve and enhance the special natural and cultural qualities of the Park;
2. The quality and connectivity of habitats will have improved, enhancing the landscape at a Park Scale;
3. The species for which the Park is most important will be in a better conservation status;
4. The qualities of wildness in the Park will be greater;
5. There will be a better targeted programme of advice and support for land managers in the Park that delivers the National Park Plan;
6. The economy of the Park will have grown and diversified, drawing on the Park's special qualities;
7. Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park;
8. Business and communities will be successfully adapting to low carbon economy;
9. The Park's communities will be more empowered and able to develop their own models of sustainability; and
10. The Park's recreation opportunities will have improved the health and enjoyment of residents and visitors.

RESPONSE

- Question 5) Do you agree the set of 10 outcomes provides the right focus for the next 5 years? If not, what else is important?
Probably, but they are quite generic and more detail on these should be added when considering policies and allocations in the Proposed Local Development Plan (also being reviewed).
- Question 6) Which are the most important outcomes to you?
6, 7, 8 and 10

5.0 SECTION 5 - Managing competing demands on the land – Land Use Strategy (pages 57 – 82)

The key principle in this section is delivering multiple benefits. Page 58 sets this out as the guiding principle for land use decisions, see below:

“The management and use of land in the Cairngorms National Park should deliver multiple benefits – delivering the best possible combination of the National Park’s long-term outcomes, always ensuring that the special qualities are conserved and, where possible, enhanced.”

The Plan recognises that it is impractical for the plan to try to reconcile all of the potential tensions and determine the precise balance of benefits and priorities across the whole park. The CNPA are carrying out a programme of work to define public benefit priorities in different areas

RESPONSE

Question 17) Do you agree with the key principle on page 58?
Yes, taking a balanced approach is absolutely necessary to meeting the aims and outcomes of the Park Plan. It should, however, recognise the culture and tradition of land management across the Park and set itself realistic targets as many could see this principle as a charter to interfere/object. A collaborative approach that is open to new ideas should be adopted to make sure that multiple benefits are delivered across the environment, community and economy.

RESPONSE

For **question 19** the Plan identifies opportunities and threats. Of these the opportunity of *“Managing the balance of land uses and pressures for land use change”* and the threat of *“loss of land to other uses”* are perhaps of most interest. There is no clear direction on how the tension between these is to be dealt with but we agree that these are clear opportunities and potentially, in certain more sensitive locations, threats. On the other hand, if communities are to grow and economic development is to be encouraged then some land has to be allocated and developed for alternative uses. The most sustainable locations for that to happen are in or adjacent to existing settlements. This is the key opportunity that the plan should address between 2012 and 2017 and could therefore answer **question 20** too.

The Plan then goes on to establish 8 policy directions and covers these in detail. In summary these are:

1. Enhance the special landscape qualities;
2. Enhance biodiversity;
3. Expand and enhance woodland;
4. Enhance resilience of habitats and land use to climate change;
5. Contribute to a low carbon economy;
6. Provide high quality recreation opportunities;
7. Target proactive advice and public support to help land managers deliver multiple benefits; and
8. Develop sustainable patterns of settlement growth, infrastructure and communications

For each of these 8 policy directions it asks (pages 67 – 82). We have provided a summary answer below:

- A. Do you agree with the proposed approach?
- B. Would you suggest a different or additional policy approach?

Policy direction 1 - Enhance the special landscape qualities

Our only comment on this element refers back to table 2.1 Special Landscape Qualities of the Park and the fact that the settlements themselves provide much of the landscape character, nestled in valley or at strategic crossing points. If this is to be a mainstay of the Park Plan then it should recognise this and the fact that expansion of these settlements is a natural and sustainable form of growth. Communities need to have a critical mass to support local services.

Policy direction 2 – Enhance biodiversity

This includes a “no net biodiversity loss” as a result of development or land management decisions. This could clearly be used as a hook for potential objectors to make a case for no development at all. We support the biodiversity aims of the Park but this policy direction also has to recognise that the Park also supports communities and that their needs should also be considered. This policy direction should be a realistic policy direction that allows for development in the right place.

Policy direction 5 – Contribute to a low carbon economy

Recent experience suggests that the guidance on where new low carbon energy generation can be located is very restrictive. Small-scale renewable generation is a real opportunity in the Park and should be embraced with more concrete proposals and guidance on where such facilities, including wind-turbines, could be located.

Policy direction 6 – Provide high quality recreation opportunities

This recognises that the Park draws in 1.4 million visitors every year, recognises the existing pressures around Aviemore and suggests a more co-ordinated approach to these. Braemar is identified as having comparatively low visitor numbers. The map on page 77 shows a clear west/east split and seems to suggest concentrating effort and co-ordination on the west around Aviemore. This misses out on the benefits and opportunities available to the east of the Park. In particular Braemar, as demonstrated in the recent Strategic Options Study carried out on behalf of the two estates and CNPA, has an opportunity to capitalise on its natural assets and location to encourage greater sustainable tourism activity.

The second point is that field sports are a major employer and tourism draw in the Park. In particular these types of activities generate high value tourism and should be supported.

Policy direction 7 – Target proactive advice and public support to help land managers deliver multiple benefits

The preferred approach set out in the Plan is to identify sub areas of the park with specific public benefit priorities although its is not clear how these will manifest themselves; develop an integrated network of advice through the public, private and voluntary sectors; provide and co-ordinate training to maintain/enhance the skills base for land-based businesses; support whole unit management plans for all farms and estates; use catchment management and deer management groups as hubs for land management co-ordination and investigate alternative ways to pay land managers for the value of public benefits delivered.

The approach needs to be a partnership approach and subject to consultation with landowners. The public benefit priorities that are yet to be identified need also to take a balanced approach that recognises the specific requirements of field sports and avoids conflict between land uses.

Page 95 of the Draft Cairngorms National Park Plan sets out the Community Vision for Braemar. Amongst others a key community wish is “... to maintain itself as a vibrant viable community, into the future, which maintains its heritage within the context of the modern world”. Critical elements in the vision include:

- Housing for local people;
- Support for local businesses;
- Communications; and
- The maintenance of local services.

RESPONSE

This, along with the recognition that tourism is key to the future of Braemar, supports the case for taking a more proactive approach and identifying Braemar as more than just a local village that needs to look after itself.

Policy direction 8 – Develop sustainable patterns of settlement growth, infrastructure and communications

This suggests retaining the settlement strategy of the current local plan that reinforces the existing pattern of settlement by supporting greater growth in the main settlements and incremental growth to meet community needs in the smaller settlements. It also promotes the new community of An Camas Mor as the main focus for growth in Badenoch and Strathspey and identifies it, along with Aviemore, Ballater, Grantown-on-Spey, Kingussie and Newtonmore as the main settlements. Other settlements would play supporting and important local roles.

The implication of this for smaller settlements such as Braemar is that they will remain secondary settlements in the hierarchy. The 2011 Strategic Options Study for Braemar identified that it has the potential to be much more than that, not necessarily a main settlement in respect of its population but a key location in respect of what it offers and the fact that it is located at the heart of the park. The 2-tier treatment of settlements therefore doesn't do much for settlements such as Braemar and we believe a more detailed approach that sets out the role of each settlement with a greater number of categories should be adopted.

Transport Executive

9 December 2011

Our Ref: KM/N/12/7
Your Ref

Dear

Cairngorms National Park Plan and Main Issues Report Consultation

Thank you for the opportunity to comment on the draft Cairngorms National Park Plan and on the Main Issues Report. Nestrans is the Regional Transport Partnership for the North East and our area encompasses the part of the National Park Area that lies within Aberdeenshire. As such we have a particular interest in the transport aspects of the two documents.

The draft plan recognises at the start that the national park does not exist in isolation but is an integral part of its surrounding areas and that management needs to consider the cross boundary influences and recognise its wider connections. However, the draft plan seems to pass over some important issues relating to transport. There would be value in recognising the role that the three Regional Transport Partnerships (RTPs), including Nestrans, have and their role (along with the individual councils) in relation to the transport of visitors to the park as well as transport within it. With the claimed 1.4million visitors to the park on an annual basis, transport to the park may well have a greater impact than transport within the park, particularly its environmental impact. In this context, the plan doesn't appear to engage with where these visitors come from and how they get to the park which might be a topic worthy of further consideration.

In terms of transport within the park, Nestrans supports the emphasis that is put on the promotion and development of active travel networks to encourage greater levels of cycling and walking. There is however more limited reference to public transport, particularly bus, which is equally important to encourage sustainable travel to and within the park for trips that are not feasible to cycle or walk.

You may already be aware that Nestrans operates a Sustainable Travel Grant Scheme which is available to organisations within our area, including our public sector partners, to support the development of sustainable travel initiatives. Organisations can apply for up to £10,000 in matched funding to support suitable schemes and initiatives. This may be of use to CNP or organisations within the Nestrans part of the CNP area who wish to develop sustainable transport projects. Further information on the grant can be found on our website www.nestrans.org.uk.

We do not have any specific comments on the Main Issues Report, in addition to the comments we have made above which I hope are helpful to you in finalising your plan.

Yours sincerely

Transport Executive (Strategy and Delivery)

Response to the Cairngorms National Park Plan
From
Nethy Bridge and Vicinity Community Council

The Cairngorms and the area of Scotland covered by the Cairngorms National Park are often described as being 'a special place'. This is in no doubt, however we have to manage the area in such a manner that the special qualities of the park and its area are not lost for the coming generations. We need to be taking a much longer look at where the park and the area are going in the decades to come. If the current rate of change and development were to be sustained and encouraged for several decades we would be living in a very different national park from the one we know now. There will be a very different quality of life for the residents and also the very reasons for having a National Park will have gone there will be precious little wildness or flora and fauna left. The 'special qualities' which the area is reputed to have will be gone and we will have killed off the very properties we are trying to protect.

We are heartened to see that the CNPA seem to have listened to local opinion in recent months and incorporated some of the ideas from local people in the proposed park plan for 2012-2017.

Probably the major issue concerning people who live and work within the park boundary is the one of housing and the built environment. Currently we have a large scale development in the pipeline for Rothiemurchus which will be completely out of character for the area which flies in the face of your stated aim of 'Settlements and built development will retain and enhance the distinct sense of place and identity within the landscape of the Park'. There is strong feeling in the area against this development as it will ruin the very qualities which we are striving to achieve. It will also add greatly to the burden on the local roads infrastructure if not sorted out at the start before development begins. The bulk of the houses will be for sale at prices completely outwith the range of local people and the 'affordable' housing element will find people from outwith the area coming in. This forms its own problem as these people will find it more and more difficult to find work as will local people.

We would like to see the CNPA, with assistance from others, lobby government to change the letting policy from National Letting to a much more focussed and Local Letting Policy but also to include provision for key workers coming in and bringing their skills to the area. This would mean that local people who have lived here all their lives would be able to get an affordable house. As it currently stands they are often beaten by the points system which takes very little notice of local needs and thinks purely in national terms. Local companies and contractors need houses at present for their work forces, affordable houses are built but not let to those workers but to those from outwith the area therefore not easing the problem one bit. In many ways this makes the situation worse because a lot of people come in to the area and then struggle to find work. This approach could solve much of the affordable housing problem in the area. We fully support and would like to see the various local authorities being able to build more social housing along the lines of the former council housing. This would also reduce the reliance on housing associations and agencies. The system, albeit with minor changes,

worked well for many years. There is political work to be done here in conjunction with the various local authorities in the park area to enable them to build more social housing. The popularity of second homes in the area does not help the situation. The cost of housing has gone up as demand (as opposed to need) for a second home has increased, further harming local peoples chances of being able to buy a home. Many local people would be very happy to build their own home but the cost of a house plot is rising also, coupled with increased planning regulations it is becoming more and more difficult. Affordable and serviced house plots available would be a major step forward.

In terms of housing styles we need to keep clear of the 'Brookside' style of development and also large scale developments by national builders and work much more with the local contractors and vernacular styles, albeit with a modern twist. The current legislation of housing in the countryside needs to be re-examined as far as the park area is concerned as it currently tries to push all housing in to urban and village areas. Very often fields and gaps in villages are described as 'infill'. This is not the case as villages the Highlands over have developed organically over the centuries with houses at different angles to each other and varying styles and spaces between. It is vital that this organic style of growth is allowed to continue. Greater thought must go in to the design and choice of street furniture including lamp standards which are all designed for urban areas. In small villages and other settlements where lighting is needed they could be of a much 'softer' design which would fit better with the surroundings. Planners need to take in to consideration current houses on a particular site before granting permission for a house to be demolished and replaced by one much larger and therefore much more expensive/valuable. There are houses which fit the local scene and are vernacular in style which have been demolished to make way for a modern house without any thought given to the possibility of restoration within the shell of the building and the attaching of a sympathetic extension. Once a house is demolished and replaced by a larger one it is lost to the local community for ever. Currently planners seem all too happy to allow this demolition to go ahead. There are some most attractive examples of this restoration work within the park and are to be commended. They fit in much better with the locality and maintain the visual appearance of having been part of the landscape for many years. There are similar examples of disused farm and industrial buildings which can likewise be altered and improved to modern housing standards.

The area must not become a play area for the rest of Scotland and further afield. There are a finite number of people that the area as a visitor destination can absorb without causing great harm to the flora and fauna. It will also become much more difficult for visitors to enjoy the 'wildness' of the area which is so heavily promoted and encourages visitors to the area. We are in grave danger of killing off the goose which lays the golden egg. Again if the current increase in use of the park continues where will we be in a century's time?

While working within the structures of both the CNPA and the various local authorities and Community Councils which make up the park much more autonomy must be given to the various communities as they all have different needs and aspirations. What works for one community will not necessarily work in another. One very good example of this has been the Our Community a way Forward which has now recently concluded. It has

brought many good ideas and thoughts to the public forum from people living within the various communities taking part. This model has to be built upon giving more of a say to the individual communities. There has to be bottom a bottom up outlook as opposed to a top down outlook. This will lead to a much stronger sense of worth and identity for the residents of the park who know their needs best.

The CNPA in conjunction with both local and national government need to take a close look at both transport costs and infrastructure. There is much made about the cost of fuel for vehicles without anything being said about the costs the local garages are having to pay upfront to stock fuel. There is also the cost of heating oil in the coldest areas of the country to be considered. Large supermarkets in Inverness and Elgin etc. can sell fuel cheaper than the local suppliers can buy but the bulk of people do not realise this and blame the local supplier. As far as the road system is concerned, while not a function of the CNPA, much has to be done to bring it up to date and indeed repair. This will become more and more critical as the number of visitors and residents increase. Thought must be given to ensuring that road systems are in place before the likes of An Camas Mor are built. If not then the local road systems will be unable to cope. We seem to be one of the few National Parks in the world where development and building seem to be encouraged, on the one hand to bring in more tourists and visitors and secondly to bring in more business.

Sandy McCook,
Chairman,
Nethy Bridge and Vicinity Community Council,
December 2011

DRAFT Cairngorms National Park Plan 2012-2017

Consultation September - December 2011:

First, a general point. NEMT has a role of acting as an umbrella organization for north-east climbing and walking clubs. We are currently providing leadership and coordination for COAT's Adopt-a-Path scheme. We are well-placed to act as a coordinating body for appropriate schemes.

Draft Responses to Selected Questions

Question 1: What makes the National Park Special to you?

Response 1: the Draft Plan says (p. 13) that "*we know [that] the National Park is special for its natural heritage [and] .. also. for its cultural heritage and recreation opportunities*". We agree with this sentiment, but stress that: "we" should be interpreted as the Scottish and UK people as a whole, with lesser though due regard to (a) others such as foreign visitors and residents and (b) Park residents.

Question 2: Do you agree with these descriptions of the special qualities?

Response 2: the "special qualities" of the Park are "summarised" in four "key themes" (an odd word?), viz. (in brief) its mountains, habitats, landscape and "wildness and space". We agree with these descriptions, and are particularly glad to see its mountains listed first, even though (or because?) these provide the basis for most of the Park's special habitats and landscapes, and almost all of its "wildness and space". The lower parts of the Park are not in themselves highly special as a whole, particularly where these are dominated by commercial plantation, communications (roads, rail, pylons, etc.), hydro-electric installations, standard modern buildings, etc. The Plan therefore needs to (i) protect and where appropriate (which will be seldom) enhance the "special qualities" of the mountains, while (ii) seeking to upgrade the qualities of many lower areas where degradation has taken place in the past, and may still be doing so.

Question 3: Are there other special qualities you think should be explicitly identified in the National Park Plan?

Response 3: We are not convinced by the rather purple prose (p. 14, and Table 2.1 on p. 15) derived from a 2010 study. Phrases such as "*Strong juxtaposition of contrasting landscapes*" and "*The harmony of complicated curves*" mean very different things to different people. We would like "remoteness" (of areas, not settlements) to be given higher priority in the document as a whole; while "the long walk in" concept has its critics, there is no doubt that physical remoteness brings its own mental and physical health

benefits, as well as biophysical ones such as low disturbance levels to soils and wildlife.

SECTION 3 Vision and Strategic Objectives (pages 16-22)

Question 4: Do you think the long-term outcomes should be updated and condensed? If so, how?

Response 4: We welcome the reduction in the number of long-term outcomes from 23 to 10, particularly the removal of those unlikely to be achieved (e.g. “consistently exceeds residents’ and visitors’ expectations”; outcome 17, p.18) or marginally relevant (“learning” and “knowledge”; outcomes 22 and 23, p. 18).

SECTION 4 What should our focus be for 2012-2017 (pages 23-56)

Question 5: Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

Response 4: We particularly support Outcomes nos. 2 (habitat quality and connectivity), 3 (conservation of iconic species), and 4 (wildness). However, we are concerned that proposed Outcomes 5 (advice for land managers), 6 (economic diversification), 8 (adaptation to a low-carbon economy) and 9 (more local empowerment) focus too much on local as opposed to national objectives (which should dominate for a National Park), and may simply utilise some of Park’s scarce public resources for nation-wide purposes which are separately funded by the Scottish Government.

Question 6: Which are the most important outcomes to you?

Response 6: Outcome 4 (“The qualities of wildness in the Park will be greater”).

Question 7 – Outcome 1 – More people will learn about, enjoy and help to conserve and enhance the special natural and cultural qualities of the Park

A – The more people who appreciate the Park, the bigger lobby support it and so we agree that this is an important Outcome.

B – Yes

C – No

D – We are currently providing leadership and coordination for COAT’s Adopt-a-Path scheme. NEMT has a role of acting as an umbrella organization for north-east climbing and walking clubs. We are well-placed to act as a coordinating body for appropriate schemes.

Question 8 – Outcome 2 – The quality and connectivity of habitats will have improved, enhancing the landscape at a Park scale.

A – This is very important and vital to efforts on Outcome 3 below.

B – Yes. However, we would point out that, without work package 1, identifying opportunities for expansion and connection, the rest of the work packages would be useless. Work package 1 underpins this whole Outcome and needs to be specially pursued and protected.

C – No, focusing on these packages should work well

D – Provision of volunteer labour, although it is difficult to see how volunteer labour would help in this case.

E – Good indicators, but the targets of 5% are rather lacking in ambition, 10% would be more appropriate

Question 9 – Outcome 3 – The species for which the Cairngorms National Park is most important will be in better conservation status in the Park

A - Yes

B – The packages are OK but are very consultative, lacking input to SMART targets

C – See above.

D – Provision of volunteer labour, although it is difficult to see how volunteer labour would help in this case.

E – Something as important as this deserves good-quality SMART indicators and targets. The proposed indicators and targets are measuring inputs and not outcomes.

Question 10 – Outcome 4 – The qualities of wildness in the Park will be greater

A – This is an extremely important Outcome and, in our view, absolutely key to the success of the Park

B – The packages of work fall far short of what is needed. For example, the piece on hill tracks talks about following best practice in the design of hill tracks. This fundamentally misses the point that any new hill track, no matter how well designed, destroys the quality of wildness in the area. Development and wildness are two opposite ends of the spectrum. 2 of the 4 proposed work packages talk about development. Work package 4 on improving information, interpretation, etc. is useless unless positive steps are taken to halt the ongoing loss of wildness. The plan needs to make it clear that the Park Authority will rigorously enforce the need to apply for planning permission and will call in all such applications.

Two other work packages should be added; one to address steps necessary to ensure that the supplementary guidance on wildness is given a special emphasis. All planning applications should be required to address the implications of the proposed development in the light of the wildness guidance. The second package needs to address the issue of current windfarm developments threatening to surround the Park. Some form of protocol needs to be established for surrounding non-Park land to stop the current erosion of the Park's landscape character by surrounding windfarms.

C – The work packages need to be stronger and more forceful. Woodland creation, provided that it is appropriate woodland, is a positive step. What about removal of features that are presently degrading wildness?

D – We would very much like to support efforts at increasing wildness and could for example provide volunteer labour to help measure wildness.

However, we would have little interest in measuring wildness next to say a new housing estate.

Question 11 – Outcome 5 – There will be a better targeted programme of advice and support for land managers in the Park that delivers the National Park Plan

A – We are deeply suspicious of the motives of a proportion of the land managers in the Park, e.g. their attempts to justify new hill tracks. However, we agree that there is a substantial proportion with the right motives and hence we support this Outcome.

B - Yes

C - No

D – We would be glad to be consulted on advice, etc. being considered for land managers, especially as it relates to the management of non-motorised visitors to mountain areas..

Question 12 – Outcome 6 – The economy of the Park will have grown and diversified, drawing on the Park’s special qualities

A – We do not support this Outcome as presently worded. We believe that the wording needs to be tighter to ensure that business success is not measured across all businesses but reflects those businesses that add to rather than “drawing on” the character of the park, e.g. those that use the Park’s special qualities, those that fit into or enhance the very special environmental / landscape requirements, and those that are based around truly sustainable tourism. Given this small rewording, we could support this Outcome

B - Yes

C – Why is no mention made of looking to see how other National Parks have addressed this issue? Some of the English National Parks have a long history in this area, against a background of far tighter conservation requirements.

D – No

Question 13 – Outcome 7 – Settlements and built developments will retain and enhance the distinct sense of place and identity within the landscapes of the Park

A – Yes, but we are doubtful that any new settlements and some new built developments can “retain and enhance” as is suggested.

B – The packages need to be more specific. As written, they almost read as though the CNPA just has to do a good job. We need more specifics on the “Quality in Design” programme and the proactive guidance.

C – As per comment above.

D – Not our area of expertise

E – The indicator is rather narrow and should be wider than just high street improvement projects. In addition, the target is just to complete all projects. That could be one or a hundred. It is an input, not an outcome, and needs to be more specific.

Question 14 – Outcome 8 – Business and communities will be successfully adapting to a low carbon economy

A – We question how relevant this is to the Park. The work packages as outlined are essentially national, and there is nothing of specific relevance to

the Park. It should not be assumed that the Park has a special role to play in this area, and it should simply be acknowledged that it will follow national programmes. The problem with this sort of outcome is that it attracts scarce resources away from locally more important issues (without in any way, saying that at a national level, this is not extremely important)

B – No comment – see above

C – No comment – see above

D – Not something that we would want to be involved in.

Question 15 – Outcome 9 – The Park’s communities will be more empowered and able to develop their own models of sustainability

A - We believe that the wording of this Outcome needs to be tightened up. As written, this could lead to a series of self-governing communities, inwardly focused, lacking cohesion to the wider Park, and following a non-national agenda. We support empowering communities but within a clear framework with national goals. After all, the Park is a national park, and visitors and users from outside the park have an important voice which could be lost in this proposed wording

B - Yes

C - No

D – No

Question 16 – Outcome 10 – The Park’s recreation opportunities will have improved the health and enjoyment of residents and visitors

A – Yes. However, this is another Outcome that needs to be dove-tailed into the national framework. For example, Park resources should not be used to increase public awareness of the health benefits of recreation activities. This is a role for a national programme. However, Park resources might be used to increase the public awareness of the opportunities for healthy exercise within the park.

Development of the core path network needs to be taken carefully, e.g. upgrading the Speyside Way is something that we would support, but developing paths, as opposed to maintaining them, in the sensitive inner core would be something that we strongly oppose.

B – Yes, provided that, e.g. work package 3 is not taken to mean building a cycle path through either the Larig Ghru or the Larig an Laoigh or even upgrading routes such as Dee-Tilt or Dee-Feshie

C - No

D - No

Question 17: Do you agree with the key principle on page 58? (*“The management and use of land in the Cairngorms National Park should deliver multiple benefits – delivering the best possible combination of the National Park Plan’s long-term outcomes, always ensuring that the special qualities are conserved and, where possible, enhanced.”*)

Response 17: In part, this “principle” is unarguable – land management and use always deliver multiple benefits (and perhaps losses) – and in part, it is meaningless: what exactly is “best possible”, and how is that arrived at? We support the (implied?) prioritisation of the Park’s “special qualities”, but in

general we are not convinced that this attempt to supplant or complement the objectives of the Park as laid down in the relevant Act is very useful. A “key principle” that appears on p.58 is hardly convincing!

Question 18: If not, why?

Response 18: See previous Response

Question 19: Do you agree with the opportunities and threats identified, if not why?

Response 19: The Farmlands threat “*Continued reduction in economic viability of farming and reliance on changing public support mechanisms*” is in part an opportunity. Most Park farming is already completely unviable without such “mechanisms”, and is likely to remain so; thus, the mechanisms should be utilised (and modified through pressure on Scottish and other governments) so as to best serve Park objectives, i.e. public (and not private) goods and services. The “*loss of edge habitats*” threat should be reduced if current CAP reform proposals from the European Commission are adopted at field and farm level.

As regards Forestry, we are concerned that current harvesting techniques often leave wide areas of clear-felling in a highly degraded state, visually for several years, and semi-permanently for on-foot access. In addition, there are frequently soil compaction, “potholing”, and industrial litter. The Park should encourage the sector to generate and follow much better practice in these respects.

Question 20: What are the particular opportunities and threats that you think the Plan should address between 2012-2017?

Response 20: Revision from 2014 onwards of the Common Agricultural Policy and especially of the Scottish Rural Development Programme provides a significant opportunity for requesting and utilising changes that will benefit the Park, e.g. retargeting of funding away from large-scale farming in other, lower-nature-value parts of Scotland.

An obvious threat is reduced funding from the Scottish Government. The Plan can help by identifying and highlighting aspects where the Park contributes uniquely (and hence without immediate policy consequences elsewhere) to Scottish objectives and assets.

Question 21 Policy direction 1

Enhance the special landscape qualities

Generally Yes. Wildness implies natural processes, and there is little scope for its “enhancement” by human intervention, except to prevent incursions that reduce its quantity and quality. We consider Landscape Quality and Wildness

to be important qualities of the area. Both are difficult to quantify, but all development, including “enhanced access”, is likely to reduce these qualities. The greatest threat to the area is the reduction in wildness. Development should be confined to low ground, with protection of the core areas. The 4th approach is more appropriately part of Policy Direction 6 (Recreation). We would like to see that the supplementary guidance on wildness is given special emphasis. All planning applications should be required to address the implications of the proposed development in the light of the wildness guidance.

Question 22 Policy direction 2

Enhance biodiversity

Yes. We see the benefit of complete habitat health, rather than targeting specific species. Extending specific monitoring and protection beyond designated sites provides an opportunity to demonstrate the positive benefits of “National Park” designation.

Question 23 Policy direction 3

Expand and enhance woodland

We support this approach, provided that policy directions 1 and 2 are given appropriate emphasis and potential conflicts are well-managed. Targets for expansion of woodland cover should be driven by landscape character and habitat quality, not simply by a national figure. It should be established that species are appropriate to a particular local area. We favour natural regeneration when possible, rather than looking for the quick fix of extensive planting. Increasing woodland cover to 25% of the area of the National Park means (as in Scotland as a whole) a much greater increase in certain sub-areas, and indeed seems likely to encroach significantly on agricultural pasture and on available views. Parts of the A9 are already lined on one or both sides by trees which obstruct views (and future tree growth will worsen this, as along the side of Loch Laggan), and more planting along this road and others (which is much more likely than more remote and less economic sites) will increase loss of visibility (as well as heightening the risk of deer-traffic accidents).

Question 24 Policy direction 4

Enhance resilience of habitats and land use to climate change

While supporting the proposed approaches, we feel they do not go far enough and simply seek to mitigate the effects of climate change. We wish to see a more active approach with the aim of slowing the causes of global warming. However, as noted above, national resources should be used for this and park resources used on park specific aspects such as conservation of the unique environment.

Question 25 Policy direction 5

Contribute to a low carbon economy

As with Q24, we feel that a better response to global warming is vital. The Park Authority needs to be seen to be setting an example in the use of national resources (and not using its own precious resources) to making a significant contribution in all of its activities.

Question 26 Policy direction 6

Provide high quality recreation opportunities

The approaches here are very general and are difficult to support without more detail. We agree that there are already high-quality recreation opportunities in the National Park. Some work may make these available to a wider user group, but this should be done without detracting from the qualities of the area. Any promotion should be carried out with great care, with the aim of highlighting alternatives thus spreading the load, rather than simply generating “new business”. Core paths are important access routes, but beyond this have limited relevance to much of the core area of the Park. We maintain that it should be possible to avoid conflict with other land users. Apart from between recreational users, most interaction occurs at access points and in non-core areas. Management of this appears to be well handled by the LOAF. We would be interested to hear about “new approaches” that might be used to manage pressures at “honey pots”, including the Glenmore corridor.

Question 27 Policy direction 7

Target proactive advice and public support to help land managers deliver multiple benefits

Generally yes. The land of the Park has very varied ownership. We welcome an integrated approach to support, advice and training to/for land managers. Training to encourage preferred behaviour is particularly important. In terms of finance, we favour a move away from payments for actions (or avoidance of a harmful action) to a system of payment on desired outcome.

Question 28 Policy direction 8

Develop sustainable patterns of settlement growth, infrastructure and communication

Partial support. We support many of the principles of this section – improvement of the major communication links, maintenance of existing patterns of settlement, with a hierarchy of villages. We agree that development should be limited to locations with existing transport and service infrastructures. The specification of IT communications should not be underestimated.

As detailed in our response to the “Main Issues” paper, we cannot support the development of a new town. While supporting the quantity of “affordable” housing, we believe that the proposed total expansion in housing is inappropriate. We are not convinced of the need for this scale of development.

PERTH AND KINROSS COUNCIL

Enterprise and Infrastructure Committee – 23 November 2011

CAIRNGORMS NATIONAL PARK PLAN AND MAIN ISSUES REPORT CONSULTATION

Report by the Executive Director (Environment)

This report has been prepared to inform Members of the Draft Cairngorms National Park Plan 2012-2017 and the Cairngorms National Park Main Issues Report consultation, to highlight relevant content of these document and how they apply to Perth and Kinross Council area, and to agree to the proposed comments in response to the consultations.

RECOMMENDATIONS

The Committee is asked to:

- i) Note the publication of the Draft Cairngorms National Park Plan 2012-2017, and the Cairngorms National Park Main Issues Report and subsequent consultations
- ii) Note the content of the Park Plan and Main Issues Report and their relevance to Perth and Kinross Council
- iii) Agree to the proposed response to the consultations.

BACKGROUND

1. In accordance with the National Parks (Scotland) Act 2000, the Cairngorms National Park Authority (CNPA) has prepared a Draft Cairngorms National Park Plan 2012-2017 for public consultation. This draft plan builds on the current National park plan 2007-2012.
2. The Planning etc (Scotland) Act 2006 also places a duty on the CNPA to prepare a Local Development Plan. The first stage of the plan preparation is the Main Issues Report (MIR) which sets out the Authority Vision, Spatial Strategy, Issues and Options for development.
3. This report has been prepared to bring to Members' attention the relevant parts of the Draft National Park Plan and the MIR and their application to areas that are the responsibility or concern of Perth and Kinross Council and to propose an appropriate response. The Draft Cairngorms National Park Plan 2012-2017 can be viewed online at <http://www.cairngorms.co.uk/resource/docs/publications/13092011/CNPA.Paper.1719.Draft%20Cairngorms%20National%20Park%20Plan%202012-2017.pdf> and the Main Issues Report at <http://www.cairngorms.co.uk/resource/docs/publications/19092011/CNPA.Paper.1719.Draft%20Cairngorms%20National%20Park%20Plan%202012-2017.pdf>

[er.1731.MAIN%20ISSUES%20REPORT.pdf](#). Copies are also available in the Members lounge.

DRAFT CAIRNGORMS NATIONAL PARK PLAN 2012-2017

Background

4. The National Park Plan as indicated above has been prepared by the CNPA to set out the vision and strategic objectives for the Park over next 5 years in order to meet the 4 aims for Scottish National Parks. As set out by the National Parks (Scotland) Act 2000 these four aims are:
 - To conserve and enhance the natural and cultural heritage of the area;
 - To promote sustainable use of the natural resources of the area;
 - To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
 - To promote sustainable economic and social development of the area's communities.

5. In terms of the planning system and how the National Park Plan relates to the land use planning, it provides the strategic context for development planning (including the MIR) and is also a material consideration in the determination of planning applications. This Draft National Park Plan therefore provides the strategic context and vision for the Local Development Plan which is being prepared by the CNPA.

Vision and Strategic Objectives

6. The vision of the Draft National Park Plan has been simplified and clarified from the previous National Park Plan and is proposed as follows: "An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together".

7. Three Strategic Objectives have been set out in the Plan to deliver this vision:
 - (1) To ensure the Cairngorms National Park is a special place where the natural and cultural heritage is conserved and enhanced.

 - (2) To develop a sustainable economy that supports thriving and resilient business and communities.

 - (3) To ensure the Cairngorms National Park delivers an outstanding visitor experience and is an international benchmark for sustainable tourism.

Proposed Response: Agree with the proposed vision and strategic objectives and consider them to be in line with PKC Corporate Plan's aim to build a vibrant and successful area and safe, secure and healthy environment. Objective 1 of the Corporate Plan seeks to provide a Safe, Secure and Welcoming Environment which recognises the natural and heritage assets of the area. Objective 3 seeks to provide a Prosperous, Sustainable and

Inclusive Economy through developing a sustainable local economy, with the tourism sector playing a major part of achieving a vibrant and successful area.

Park Plan Outcomes

8. Further to the vision and strategic objectives, the Plan sets out its long and short-term outcomes. With regards to its long term outcomes, reference is made to the 23 outcomes which were set out in the first National Park Plan. These fell in to the following 3 categories (i) A special place; (ii) A sustainable economy and (iii) An outstanding visitor experience. The Draft Plan proposes to update and condense these outcomes and asks for help on how these could be defined in the new Park Plan.

9. The Plan does however set out its short-term 5 year outcomes and indicates for each what benefits they will bring, how and by whom they will be delivered, and the suggested indicators and targets for each outcome. The short-term outcomes proposed in the National Park Plan are:
 - More people will learn about, enjoy and help to conserve and enhance the special nature and cultural qualities of the Park.
 - The quality and connectivity of habitats will have improved, enhancing the landscape at a Park scale.
 - The species for which the Cairngorms National park is most important will be in better conservation status in the Park.
 - The qualities of wildness in the Park will be greater.
 - There will be a better targeted programme of advice and support for land managers in the Park that delivers the National Park Plan.
 - The economy of the Park will have grown and diversified, drawing on the Park's special qualities.
 - Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park.
 - Business and communities will be successfully adapting to low carbon economy.
 - The Park's communities will be more empowered and able to develop their own models of sustainability.
 - The Park's recreation opportunities will have improved the health and enjoyment of residents and visitors.

Proposed Response: We agree that long-term outcomes should be updated and condensed and agree with proposed short-term outcomes as outlined above.

Land Use Strategy and Policy Directions

10. The final part of the National Park Plan looks at managing the competing demands on the land through the land use strategy. A principle for guiding land use decisions is proposed as follows: “The management and use of land in the Cairngorms National Park should deliver multiple benefits – delivering the best possible combination of the National Park Plan’s long-term outcomes, always ensuring that the special qualities are conserved and where possible, enhanced”.
11. In order to implement the land use strategy the National Park Plan proposes the following policy directions:
 - Enhance the special landscape qualities
 - Enhance biodiversity
 - Expand and enhance woodland
 - Enhance resilience of habitats and land use to climate change
 - Contribute to low carbon economy
 - Provide high quality recreation opportunities
 - Target proactive advice and public support to help land managers deliver multiple benefits.
 - Develop sustainable patterns of settlement growth, infrastructure and communications.

Proposed Response: Support and recognise the need for the protection and enhancement of the landscape quality, biodiversity, woodland, natural and built environment/heritage. However despite equal emphasis given in the Draft Plan to protection of the environment, promotion of sustainable economic growth and enhancement of visitor experience, the guiding principle for land use planning and development with the CNPA area is primarily on the protection and enhancement of the environment. Whilst it is recognised within the Plan that there needs to be a co-ordinated and balanced approach to the protection of the environment and promotion of sustainable economic growth, there is some concern on how this will be practically implemented. PKC would like to see more detail on how implementation will be balanced to ensure that the communities within the National Park are able to grow and thrive. In addition whilst the Draft Plan recognises the important part tourism plays in terms of the economy, and the livelihoods of the communities, there is a real concern about addressing the conflict between provision of associated tourist facilities and provision of local housing. This is an issue which PKC recognises across the entire Council area. PKC would also like to see additional guidance on how the built heritage is to be managed and delivered at this strategic level.

MAIN ISSUES REPORT CONSULTATION

12. As indicated at the beginning of this report the MIR has been prepared as part of the Local Development Plan process. The MIR is a discussion document

for consultation highlighting the main issues within the National Park area, and proposes sites and alternatives for land use.

Eight main issues have been identified within the MIR:

1. Maintaining the special qualities of the Park.
2. Reducing resource consumption.
3. Support for communities.
4. Housing/affordable housing
5. Spatial Strategy
6. Support for the rural area
7. Connectivity and communications
8. Other policy issues – cultural heritage including archaeology, conservation areas and listed buildings, developer contributions, design, development standards, house extensions and alterations, replacement houses, conversions and building re-use, and provision for travelling people.

Proposed Response: Agree on the whole with the main issues identified within the MIR but would like to see more evidence on how the Draft National Park Plan 2012-2017 has informed the MIR at a strategic level. As previously mentioned in relation to the Park Plan, there is a concern with regards to the balance between conservation and economic growth. PKC would like to see more detail on how these issues would be addressed at a local level. The Council welcomes the need to provide a framework to encourage appropriate business growth and investment, and the protection of existing employment land sites in both Blair Atholl & Bruar. However, the policies need to be flexible enough to ensure other businesses located outwith these locations can expand appropriately when required. Under other policies, reference is made to cultural heritage however we need to seek additional information on how guidance on the built heritage will be delivered through the MIR.

POLCIES AND STRATEGIES

Housing/ Affordable Housing

13. Housing need and demand within the Park indicates a shortfall in provision of affordable housing and it is estimated that there is a need for approximately 26 affordable units per year.

14. The current approach by the CNPA in the adopted Local Plan (2010) seeks a contribution of 25 - 40% of new housing development of three or more houses to be affordable. For development of one or two units a financial contribution is sought.
15. The MIR provides 3 options to meet housing need in the communities:

Option 1 – the current approach

Limit new housing development to provide only that identified as required in the housing assessments. This will take into account those sites with permission, and focus new development opportunities on sites which are allocated in the existing adopted Local Plan. On those sites CNPA would require a proportion of between 25-40% affordable units.

Proposed Response: Developments are not likely to be viable at a 40% contribution given higher building costs in rural areas.

Option 2

Focus all new development in the provision of affordable housing by only identifying sites for 100% affordable housing (bearing in mind the existing consent).

Proposed Response: We would question where finance would be available to implement this.

Option 3 – Preferred Option

Support the needs of communities by ensuring all main and other settlements have some options for future development. Focus new housing on those sites already adopted in Local Plans. On these sites require a benchmark of 25% affordable development (bearing in mind existing consents)

Proposed Response: We would support the preferred option as it would be in line with Perth and Kinross Council's own current Affordable Housing Policy.

Settlement Strategies

16. The policy approach of the CNPA is to retain existing settlement strategies by supporting greater growth in the main settlements and support growth to meet community needs in other settlements. Blair Atholl, Bruar and Pitagowan and Killicrankie have been identified as 'other' settlements within the MIR. The following strategies have been identified for these settlements:

Blair Atholl

17. Through pre-MIR consultation the CNPA identified that the community was keen to maintain its traditional character but recognised the need for growth in

terms of housing, job opportunities and strengthen the trade sector including the service and tourism sectors.

18. Whilst reference is made to the existing housing sites in the adopted Highland Area Local plan 2000 the issue of flooding on these sites has been identified as a constraint. Therefore an alternative site is identified for housing to the southeast of the settlement to provide short-term (0-5years) supply.
19. Two economic development sites have been identified which in fact are carried forward from the adopted Highland Area Local Plan 2000, one to the west of the village for industrial/business use and the other, the railway goods yard which is to be protected for its current use.

Two options are given for the settlement strategy for Blair Atholl:

Option 1 – Preferred Option

- Include the site to the southeast of the village to provide opportunities for housing
- Use the land identified in current Local Plan to provide opportunities for economic growth

Option 2 – Alternative Option

- Retain the sites included in current Local Plan to provide opportunities for housing
- Use the land identified in the current Local plan to provide opportunities for economic growth
- Identify no new land

Proposed Response: Given that the existing sites have proved ineffective due to flooding constraints PKC would support preferred Option 1 to provide opportunities for future development, with the retention of the business land/employment land to the west of the village and the rail freight goods yard as an opportunity use. However we would recommend CNPA seeks advice from Network Rail on the whether the site is required for its current purpose or whether there would be opportunity to allow other business land or mixed use on the site. It is noted that the Draft National Park Plan seeks to continue to promote tourism within Blair Atholl however no provision is made for the development of further tourism use within the settlement. We would propose that either the site designated for employment/business land could also allow opportunities for tourism development, or an alternative site is sought. Blair Atholl has a conservation area which needs to be indicated within the proposed plan and relevant policy provision made in terms of the protection and enhancement of this designation.

Bruar and Pitagowan

20. The MIR recognises the importance of House of Bruar in terms of direct employment and visitors to the area and associated expenditure impacts. The adopted Highland Area Local Plan 2000 identified the area as an opportunity for industrial, business and tourist uses and it is proposed to continue this support.
21. One option is given for development within the settlements as follows:
- Use the land identified in the current Local Plan to provide opportunities for economic growth
 - Identify no additional land

Proposed Response: We would recommend expanding the existing opportunity designation to include the whole site for tourism/business use which encourage future tourism/business use.

Killiecrankie

22. Through pre-MIR consultation residents sought the need to enhance the provision of tourist facilities in the area, balancing the needs of residents. Of particular importance was local housing with a key priority for young people and families.
23. The Highland Area Local Plan 2000 identifies a site at Shiel Brae was identified for housing and it is proposed this will be used as a basis for future development opportunities. It is also proposed that the railway goods yard is retained for railway use as identified with the Highland Area Local Plan 2000.
24. One option is set out for development within the settlement as follows:
- Use land identified in current Local Plan to provide opportunities for housing and economic growth
 - Identify no additional land

Proposed Response: It should be noted that the Perth and Kinross Local Development Plan Monitoring Report had identified that an application for 2 dwellings on the rail freight site has been allowed at appeal (Appeal reference P/PPA/340/551, PKC application 06/00945/OUT). Since the adoption of the Highland Area Local Plan 2000, Network Rail has sold the site and made a statement that it foresees no likelihood of railway need for the site. The Monitoring Report should have been used as a Background Paper in the preparation of the CNPA MIR and therefore further investigation is recommended to assess whether the rail freight use should in fact be retained as proposed in the preferred option above.

CONSULTATION

25. The Head of Legal Services, the Head of Democratic Services and the Acting Head of Finance have been consulted in the preparation of this report.

RESOURCE IMPLICATIONS

26. There are no resource implications arising directly from the recommendations in this report.

COUNCIL CORPORATE PLAN OBJECTIVES 2009-2012

27. The Council's Corporate Plan 2009-2012 lays out five Objectives which provide clear strategic direction, inform decisions at a corporate and service level and shape resources allocation. This report impacts on the following:-
- (iii) A Prosperous, Sustainable and Inclusive Economy
 - (iv) Educated, Responsible and Informed Citizens
 - (v) Confident, Active and Inclusive Communities

EQUALITIES IMPACT ASSESSMENT (EqIA)

28. An equality impact assessment needs to be carried out for functions, policies, procedures or strategies in relation to race, gender and disability and other relevant protected characteristics. This supports the Council's legal requirement to comply with the duty to assess and consult on relevant new and existing policies.
29. The function, policy, procedure or strategy presented in this report was considered under the Corporate Equalities Impact Assessment process (EqIA) with the following outcome:
- (i) Assessed as **not relevant** for the purposes of EqIA

STRATEGIC ENVIRONMENTAL ASSESSMENT

30. Strategic Environmental Assessment (SEA) is a legal requirement under the Environmental Assessment (Scotland) Act 2005 that applies to all qualifying plans, programmes and strategies, including policies (PPS).
31. The matters presented in this report were considered under the Environmental Assessment (Scotland) Act 2005 and subsequent Environmental Reports were prepared for the Park Plan and the MIR by Cairngorms National Park Authority as the responsible authority.

CONCLUSION

32. The above report seeks to inform Members of the relevant content of the Draft Cairngorms National Park Plan 2012-2017 and the Cairngorms National Park Main Issues Report and seeks agreement on the proposed responses on issues, policies and settlement strategies relevant to Perth and Kinross Council. The contents of the Park Plan and the Main Issues Report are broadly compatible although some areas require further information or clarification - particularly in relation to the balance between conservation of the natural and built environment whilst encouraging sustainable economic growth.

**J F IRONS
EXECUTIVE DIRECTOR (ENVIRONMENT)**

NOTE

No background papers as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

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Date of Report 09 March 2012

If you or someone you know would like a copy of this document in another language or format, (On occasion only, a summary of the document will be provided in translation), this can be arranged by contacting the Directorate Support Team
on
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Council Text Phone Number 01738 442573

Dear Sir,

Cairngorm National Park Plan.

May I please request that in your future plan you include a far greater emphasis on fishing in the area.

QAs can be seen from the publication *the Economic Impact of Game and Coarse Fishing in Scotland* published by the Scottish Executive in 2004, and I appreciate that the statistics are quite old, angling in the National Park area is considered to be worth £36 million a year. In that publication they state that each angler spends, on average £140 a day, and by now this could be considerably more. Section 5 Angler Activity and Expenditure of the Report.

The highest spending are non Scottish Visiting Anglers and these are stated as spending £195 per day.

These anglers are hugely valuable to us as providers of accommodation, fishing waters and facilities, including shops equipment and all other aspects.

It requires considerable emphasis to capitalise on these great asset that we have. The Irish do it well and we should be emulating them.

Yours faithfully,

Captain A.D.M.McGregor

9th December 2011

Cairngorms National Park Authority
Grantown-on-Spey
Moray, PH26 3BR
parkplan@cairngorms.co.uk

Dear Sir or Madam

Response to consultation on Draft National Park Plan

Introduction

Ramblers Scotland is the representative body for walkers in Scotland and recognised by **sportscotland** as a governing body of sport. We have 6,500 members across Scotland and 55 local walking groups, including one group based in Badenoch & Strathspey and others in Inverness, Moray, Aberdeen and Strathay which draw their members from areas of the park and its surroundings. Our aims are to promote walking, secure and facilitate public access to land and to protect the countryside.

We are generally supportive of much of the draft national park plan, and therefore our response is restricted to areas of interest or concern. We attach a Respondent Information Form as requested.

General comments

As a general point, we would question the references to “people” in the Plan being restricted to either their role in local communities/businesses or as visitors/tourists. This does not give enough recognition to the international and national context of the park and the wide range of stakeholder organisations that have an interest and involvement in the Park. The Plan should recognise the significance of these stakeholders and explain how the CNPA will engage with them. Neither does the Plan give sufficient recognition of the global and European significance of the outdoor recreation, landscape and wildlife values and opportunities. In this context the Plan should refer to past proposals to establish a World Heritage Site in the Cairngorms and to consider whether there are opportunities to advance the case for WHS designation for the whole Park area.

Q1-3

The key themes generally encompass the special qualities of the park, but there are four significant omissions.

Firstly, qualities of remoteness are not given sufficient emphasis. Parts of the Park contain some of the most remote land in the UK in that this is land which is furthest from public roads than anywhere else in the UK and for most people requires considerable physical effort to reach it. The fact that this land is associated with minimum or limited impact from human activities or associated structures gives such land additional values. These are increasing as land and water elsewhere in the UK is increasingly being subject to modification and urban intrusion.

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Convener: Dennis Canavan
Director: Dave Morris

Secondly there needs to be recognition of the extensive nature of mountain views both within the Park and over large tracts of surrounding countryside. This relates to the geological and geomorphologic processes that led to the formation of the Scottish Highlands as we know them today. These Scottish mountains are quite different to other areas, such as the European Alps, where mountain formation processes have produced much more rugged landscapes, with deeply incised valleys and views which are often not as extensive and all encompassing as in Scotland. The fact that most mountain summits, ridges and plateaux in the Cairngorms and surrounding areas are of a similar altitude, typically between 3,000ft and 4,000ft, provides for very extensive high level views both within the Cairngorms and over very large tracts of mountain land between the east and west coasts. These special qualities have very great significance when the CNPA has to deal with high level intrusions from proposed wind turbines, radio masts and similar structures.

Thirdly, the Plan does not give sufficient recognition to the wildland qualities of woodland and forest environments and the river and loch systems. This is important for the extensive tracts of birch woodland in many parts of the Park and even more so for the native pinewood remnants found in many areas. These include some of the largest tracts of semi natural forest left in the UK, and are amongst the best European examples of native woodland, naturally regenerated, generation after generation, from the last Ice Ages. The Caledonian native pinewoods in the Park need far better protection than they have received over many decades and a future established which is based on their natural regeneration through better control of grazing pressures. The rivers and lochs of the Cairngorms are amongst the least modified water bodies in the UK and their biological, landscape and outdoor recreation qualities are therefore of outstanding value. There is a need to revisit the methodology used in the Draft Plan to identify wild land values.

Fourthly, the Plan needs to emphasise the significance of the oceanic climate which the Cairngorms experience. Most mountain areas elsewhere in the world are subject to continental climates so this gives the habitats and wildlife of the Cairngorms a distinctive value, in addition to which the severity of the climate, especially at high altitudes, provides a quality of experience and challenge for outdoor recreation which is not found in many other European mountain areas.

Q4

We recommend that the strategic objectives should be adjusted to more adequately reflect the importance of outdoor recreation in this Park. We suggest the third strategic objective is changed to:

.....international benchmark for outdoor recreation and sustainable tourism. (see page 21).....

One challenge that is not mentioned on p22 is the issue of potential loss of wildland qualities from the area surrounding the park through the development of onshore windfarms and powerlines. This is an issue which could lead to the park being encircled by such developments with the resulting negative impact on the enjoyment of those in the park and intrinsic landscape values.

Another issue is the potentially changing patterns for recreation and tourism which may follow as a result of economic recession and higher prices for fuel. For example, currently we assume that most visitors arrive in the park by private motorised transport, and travel around the park in their own vehicles. In the future it is possible that visitors will be less willing to take short breaks by car, or to use their vehicles for transport within the park. Therefore the development and promotion of public transport opportunities to the park and within the park, or offroad walking and cycling routes between communities, will be of great benefit to visitors as well as residents. Closure of the public road to Cairn Gorm to private motor traffic should be considered along with its replacement with a shuttle bus service or development of a gondola facility from Glenmore

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Q5-6

We agree with this set of outcomes. The most important outcomes to us are numbers 4 and 10.

Q10

A We welcome the acknowledgement that threats to wild land qualities can come from outside the park boundaries as well as within them. There should be a buffer zone around the park. We would also point out that as well as hilltracks and certain renewable energy developments, wildness can also be affected by intrusive deer fencing across large tracts of land, with its related negative impacts on access.

B We welcome the statement that inappropriate developments should not take place. We would point out that with regard to hilltracks, some tracks may be examples of good practice in terms of their construction and maintenance, but if they are built in inappropriate locations they should not be constructed. We understand that new hilltracks currently need to apply for planning permission within National Scenic Areas; we hope that the Park Authority will consider extending this requirement to apply throughout the park. We also hope that the removal of redundant infrastructure will include the removal of unnecessary hilltracks in wildland areas.

Q16

A We support the outcome and would like to see every visitor to the park spending a part of their trip in undertaking outdoor activities, such as walking or cycling, as well as a higher proportion of residents using active travel modes for everyday journeys.

B/C We agree with the approach to developing path networks in the park, in terms of concentrating efforts on paths in and around settlements and on upgrading existing paths in upland areas which are becoming damaged or heavily eroded. One major disincentive to travelling by bike or on foot is the lack of offroad routes which connect settlements or places of interest. Many roads within the park are heavily trafficked, or narrow, and this does not make it easy to entice people out of their cars. While we fully support the implementation of the core paths plan, we would also encourage the park authority to consider where key offroad routes may be developed. These do not need to be highly specified paths but could simply be designated routes running parallel to but separated from the roads along the verges or on the other side of walls, fences, etc.

D Ramblers Scotland is well-placed to support and promote walking opportunities within the park at a national level, and we are happy to work with the park authority on joint initiatives. Our groups and members within the park and in its surroundings are also potential volunteers for any events or promotions. Our ongoing work to help create a physical activity legacy across Scotland from the 2014 Commonwealth Games would be a useful way of encouraging more people to be active within the park.

Q14

Ramblers Scotland supports small scale renewable, but there should be no large scale windfarms within the national park or surrounding areas where such windfarms are visible from the Park.

Q17

Yes.

Q19

In terms of woodland on p60, "creation" does not specify whether this is by planting or through natural regeneration. The latter is our preferred approach as this would create woodland areas of greater naturalness and resilience.

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Mountain/moorland on p63 could further emphasise the point that visual intrusion could be from developments outwith the park boundary which nevertheless impacts negatively on the experience of wildness within the park. We would be looking for a buffer zone to be outlined surrounding the park.

Semi-natural grasslands, p64: in terms of inappropriate grazing, we would support deer management practices which ensure that all habitats across the national park are in favourable condition.

Towns and villages, p65: we objected to the development of An Camas Mor and reiterate our concerns at the loss of greenspace and valuable habitat in building this new settlement within the park. This development seriously compromises the integrity of the Park and is one of the worst planning decisions taken in Scotland in recent years. Every opportunity should be taken to revisit this decision and examine whether the proposed development should not proceed. Planning policy should be changed so that the growth of Aviemore is strictly constrained and future developments directed to other communities to land of limited nature conservation value.

Q20.

Those listed above, plus a reduced sense of wildness (p63) and the lack of safe, sustainable routes to services (footpaths/cycleways) on page 64.

Q21 Policy Direction 1: Enhance the special landscape qualities.

Procedures should be established to ensure that the 2011 Supplementary Planning Guidance on wild land is a material consideration in the determination of every planning application in the national park. Pro-active rewilding initiatives should be supported.

One additional point is that we would like the park authority to ensure that the National Scenic Areas within the park are retained to maintain a clear focus on the most significant landscapes.

Q23 Policy Direction 3: Enhance and expand woodland

The national park should aim to increase native woodland habitats, but the expansion of native pinewood remnants should be through natural regeneration processes, rather than by planting of trees. This is particularly important where there are opportunities for the native pinewoods to expand to higher altitudes, eventually re-establishing natural treelines. We would also like woods of high conservation value, particularly those close to settlements, to be protected from development.

Q26 Policy Direction 6: Provide high quality recreation opportunities

We would like to suggest the park develops a Recreation Strategy which would tie together the core paths plan, outdoor access strategy and the work of COAT within a zoning framework. This would help identify any conflicts between recreational land management practices, such as commercial stalking and shooting, and outdoor recreation patterns.

We are grateful for the opportunity to comment on this plan and would be happy to discuss any aspect of our response in further detail.

Yours faithfully



Dave Morris
Director
Ramblers Scotland

President: Dick Balharry
Convener: Dennis Canavan
Director: Dave Morris



3.13 In summary, a mixed tourism and residential development of the nature described above can be attractively and unobtrusively, located within a woodland setting at this locus, in full conformity with both the Adopted Local Plan and the emerging planning policies which we will review in more detail in sections 4 and 5. It is also consistent with the approach taken to date as the zoned allocations.

4.0 DRAFT CAIRNGORMS NATIONAL PARK PLAN 2012 – 2017

Vision

4.1 We agree with the suggestion of changing the vision to “An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together”.

4.2 In order for this vision to be realised, encouragement needs to be given through the planning system to local employment generation uses which bring in visitors and, visitors spend to a community. This is the very heart of our clients tourism proposal at Carrbridge.

Question 4

4.3 The long term outcomes relating to business, tourism and visitor experience are supported and these aims can only be achieved by allowing additional quality new facilities in support of existing communities such as Carrbridge.

Questions 5 & 6

4.4 We do not consider that the focus for 2012 – 2017 entirely covers the outcomes that are required to improve the economic prospects within the Park. One additional outcome should be to increase tourism and housing opportunities by embracing new development that fits the aims of the Plan.

Outcome 6 - Question 12

- 4.5 We agreed that this section is an appropriate target and the response of the Park Authority as planning authority, should be driven to support tourism initiatives and growth in the economy in addition to providing limited scale housing opportunities for local people, including self build plot locations.

Living in Carrbridge

- 4.6 We note the comments relating to Carrbridge on pages 96 and 97 and the need for enabling new house building affordable to local residents and the need for new employment opportunities locally. In addition, the community wish to see organic growth of an appropriate and limited scale.
- 4.7 The proposed tourism development will in part be funded by the sale of serviced plots for the development of the infrastructure to support the chalets, cabins and caravan development which will stimulate increasing visitor spend and additional employment opportunities locally.
- 4.8 The Community section confirms the important tourism and visitor attractions available in Carrbridge. The destination for visitors exists and therefore additional complimentary tourism accommodation facilities can do nothing but enhance the role of Carrbridge as a quality tourism/visitor location.
- 4.9 In strategic terms, the tourism and residential proposals of Rodger Builders for land at Baddengorm, Carrbridge comply with the aims and objectives of the National Park Plan and the emerging draft.

5.0 CAIRNGORMS NATIONAL PARK LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT

- 5.1 We have concentrated our response on only the issues that directly affect the type of uses we propose at the settlement of Carrbridge.

Special Qualities of the Park - Question 1

- 5.2 We agree with the preferred option of protecting areas with defined special qualities and designated sites.

Affordable Housing - Question 4

- 5.3 We partly agree with the preferred option to support the needs of the communities, provided there is sufficient flexibility to encourage a range of product to be established, including affordable self-build for example.

Spatial Strategy – Question 5

- 5.4 We agree with the generality of the spatial strategy which focuses development in settlements such as Carrbridge.

Carrbridge – Question 16

- 5.5 We generally agree that the strategic sites identified in the Adopted Local Plan and essentially confirmed in the Main Issues Report should remain the major focus for residential and employment uses.

We do not agree that these sites represent the entire option and that a limited allowance should be made for some additional houses along the A938, opposite the existing ribbon development from the golf course to Lilac Cottage.

The consolidation of Carrbridge would be achieved and a minor boundary adjustment required, as indicated in sections 2 and 3.

In addition, there is a need for additional tourism accommodation and the site at Baddengorm Woods should be allocated for additional new tourism accommodation.

6.0 CONCLUSIONS

6.1 We have considered the terms of both the Draft National Park Plan 2012 – 17 and the Main Issues Report, and have made detailed comments, largely in support of the general principles outlined.

6.2 In substance, the provision of tourism accommodation and a limited number of housing plots adjoining Carrbridge meet with the principles set out in the Draft National Park Plan and indeed, the existing National Park Plan.

6.3 In detail, referring to the Main Issues Report, we consider that the site at Baddengorm Carrbridge should be supported in the Local Development Plan as a site for tourism accommodation and house plots for the following reasons:-

- The site is close to the village, but not within it, separating tourism accommodation from residential areas.
- The site is close to shops, facilities and recreational/tourism attractions.
- The site is not within an ENV designation which comprise sites that are protected from development due to their importance re. setting of Carrbridge.
- There is a need for additional new tourism facilities within the Park area per the aims of the Draft 2012-17 Plan.
- There is a need to retain young people by providing jobs locally.
- There is a need for serviced plots for self-build for local people.
- The site's development will not have an adverse effect on the setting of Carrbridge as development will be set within the significant gaps in the woodland.
- Much of the woodland is self seeded birch.
- The setting of the village is largely formed by the plantation, which will be unaffected by this proposal.
- The serviced plots will, in part pump prime the infrastructure required to create the tourism accommodation sites.
- There are no ecological resources of any designated protection on the site.

6.4 In conclusion we recommend that this proposal to extend the village along the A938 from the house adjacent to the golf course to Lilac Cottage to incorporate a number of house plots and the entrance to the tourism accommodation. In addition, the remaining land as shown on the indicative masterplan be zoned for tourism accommodation.

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Park Plan 2007-12 Consultation Response from Rothiemurchus Estate (organisation).

General Comment

THE PROCESS

Rothiemurchus Estate is an exceptional, integrated, multiple land use management unit which delivers important public benefits for biodiversity, recreation and employment described in the Rothiemurchus Concordat with Scottish Government, The Highland Council and relevant agencies and authorities.

The Cairngorms National Park Plan establishes the high level strategic policies which plan the future of this very significant area. The consultation document emphasises the challenge of delivering these proposals through partnership and collaboration. To enable estate management to be partners in delivering outcomes, we need to have confidence that policies have been developed through transparent and inclusive processes involving leaders of the main stakeholders working together.

Our understanding of the process so far, is that for the purpose of consultation CNPA has met with the different groups by sector and kept them apart leading to an adversarial approach and missing the opportunity to find shared solutions based on mutual understanding and respect. There needs to be healthy cross sectoral discussion on the policy direction, objectives, approach and delivery leading the understanding and respect which is essential to effective delivery.

There is a general expectation that the Park Board is the forum in which discussion across interest groups can take place: however its members are disqualified from open debate and close involvement because of the code of behaviour that precludes members from discussion and voting on planning applications if they have previously expressed views, interests or have close associations. The Board is therefore excluded from meaningful cross sectoral involvement in developing effective solutions.

The estate will therefore watch the development of the Plan with interest; however, we fear that whilst the Plan will influence how CNPA behaves in terms of planning and its own expenditure, the added value that can be obtained from a broad range of agencies and the private sector working together to deliver a shared vision through shared understanding and mutual respect will not take place unless there is a change in the understanding of effective partnership working,

INTRODUCTION

Referring to the introduction there is comment regarding reduction of conflict between the aims which states that the first aim should be integral to the way the CNPA makes ongoing decisions about management. Whilst it is useful to remind the reader of the content of the Act, trying to interpret what is already a well debated and clear explanation appears to the estate to give more ammunition for protracted discussion and legal argument; better just to provide the link to the Act and perhaps quote ministerial comment made at the time of its passage which emphasises that the first aim should not be the starting point and emphasised only as a last resort.

Effective partnership should involve all partners taking responsibility for the collective delivery of the CNP aims in a co-ordinated way, not cherry picking aims. There will need to be clear leadership to achieve the change in attitude and culture to enable this to be achieved. It is human nature that engagement in partnership working is dependent on mutual respect; how will the CNPA demonstrate that it has considered the priorities and policies of its partners?

Approaches need to be relevant and appropriate to specific areas. The CNP is too important and fragile to be used as an experimental laboratory for Scotland; tailored solutions specific to the area are essential. From that lessons may be learned for Scotland and elsewhere.

The Plan does not adequately address "delivery": whilst organisations are named if they are really going to do anything special for the area we should be quoting their policies in this plan; telling them what their priorities are to be is unlikely to engage the enthusiasm and commitment to working together that is required to deliver the vision.

Q1

Part of it is our home, recreation and business. It includes a wide range of people and communities, predominantly we are dependent on sustainable land management to make our living and so we must respect and support it. The Cairngorms is a huge area with a varied range of interests and culture who will do their utmost to maintain their identity; Rothiemurchus Estate is just one of them. Local people and businesses have been relatively silent because they don't have the time or capacity to argue with focused single interest groups. Government has mainly been remote and in the past has been over influenced by undemocratic, self appointed, single purpose lobbies.

Q2

No; the special qualities vary from place to place: the use of the word "folk" implies that there is another sort of people; this is entirely inappropriate to Highland Culture and for the modern world.

The most significant effect of the mountains is not the geomorphology; the effect is making communications and linkages between communities difficult with a huge diversity in communities and cultures as a consequence.

For many indigenous residents on Rothiemurchus and visitors, 'the wistfulness of abandoned settlements' is a constant reminder of failure, inequalities, unsympathetic government and is not a special landscape quality to be celebrated. There is international evidence that it does not contribute to an attractive or positive image for an area nor is it attractive to commercial investment

Q3

A long history of mostly careful management and sensitive development based on long term planning and investment

Highly significant in UK and EU terms for biodiversity as measured by proportion of area designated as N2000 sites

Exceptionally popular for recreation and education

High level of social and economic dependency on lower paid occupations.

Diverse cultures and communities

Well developed facilities, accommodation, attractions and activities;

At one time it was thought to be unique and of World Heritage Site importance in terms of geomorphology (CWP 1992?) but this may have been superseded by new understanding.

Q4

Referring to 3 Vision and Strategic Objectives

These strategic objectives should be taken as one: they are largely interdependent and can only work together in a coordinated way.

Splitting them as proposed here leads to separation of discussion and decision making and will exclude effective participation by front line management such as estates and other businesses who can deliver the objectives. The purpose of National Parks is to enable joined up management because it is much easier to divide objectives and tick them off one by one, however that is not the way it works on the ground. The NP (Scotland) Act seeks joined up management: management that seeks to deliver practical outcomes through recognising reality as opposed to that which simply makes meetings easy and minutes and reports that are more academic than practical.

Yes, they do need to be updated and condensed by a sensible, cross sectoral group or groups.

Q5

Primary outcome: facilitating a sense of working together achieve shared outcomes should be the only CNPA outcome; if that is right the rest will follow.

The list of Outcomes should be encouraged and celebrated: it should not be used as a basis for telling people what not to do; there are already sufficient National Policies such as Planning Advice Notes for doing that: duplication and gold plating of National Policy is confusing, acts as a barrier to cross disciplinary team working and is currently suffocating the enterprise culture.

CNPA has produced its own policies; with very limited resources; they cannot be as well researched or written as National Policy and this leads to confusion. It would be better to accept the National Policy and if it is considered that the Cairngorms policy should be a little different then add a sub note to that effect. Having both National and CNPA policy to check makes an already challenging task even more burdensome our experience is that it has added significantly to planning costs, leads to confusion and discourages investment.

Q6

A belief and confidence in working together

Q 7

The outcomes are interdependent; social, environmental and economic aims must be met together. Too little attention is paid to the economic outcomes: there is little if any recognition that a healthy economy is the gateway to achievement of the other aims.

Q8 and 9

No smart targets upon which to comment.

Rothiemurchus targets include:

- Enhanced effective working relationship with the public sector
- Completion of 200 homes and space for employment in an embryonic High Street at An Camas Mor.
- Sustainable use of local material
- Sustainable processing of waste
- Additional 300 Ha of tree regeneration
- Sustainable public funding for biodiversity and public recreation outcomes
- Sustainable Energy production and use, biomass and hydro
- Modernisation of camping and caravanning facilities
- Review of fish farming operations
- Modernisation of farm steading for feed storage and in wintering of cattle
- Improved facilities for production of food for local consumption
- Review of buildings and use at Rothiemurchus Centre and Inverdrue Wood
- New uses to save buildings at risk
-

Q10

No

Q11

Land based training programme is strongly supported.

The number of full time equivalents in land based work should be monitored.

Aviemore and Vicinity, a fair summary from an Aviemore perspective; within this framework An Camas Mor and CRAGG areas should be considered separately in their own fora with the objective of delivering the four aims in a co-ordinated way.

Q12

Yes as far as it goes

Recognition should be given to the fact that the vast majority of activity is carried out by business and its customers; so business is the key to achieving the vision.

Customers are the key to business: all decision making should include an assessment of customers and their needs; so in terms of the National Park regular and relevant customer research should be carried out.

Q13

Agree

Q14

A common sense approach must be taken to these aspirations, which could involve significant amounts of additional time and investment for both the CNPA and businesses. National policies should not be 'gold plated' for the CNP and/or made more difficult and expensive to achieve than the rest of Scotland.

Q15

Communities should be supported to work towards co-ordinated social and economic and environmental sustainability together understanding that community fatigue is a very real threat.

Q16

Any Mountain Biking cluster should be pan Highland not restricted to the CNP. Mountain biking is a 'young' but fast growing sport which has the potential to make a significant contribution to the economy of the CNP as well as to national targets for health and well being. This can only happen if mountain biking becomes sustainable and the CNPA has an important part to play in the development of solutions to this challenge. Any cluster must include road cycling, off road biking as well as single track and downhill biking to be effective.

Q17

Yes

Q18

N/A

Q19

Generally agree, however the most significant threat is creating barriers to initiative through over regulation.

Q20

How to achieve the Park Plan, noting that it cannot be done by regulation alone.

Q21

It is not necessary to introduce a Landscape Framework. The landscape should be formed by good practice in terms of biodiversity, sustainable land use management, building and urban design. The Cairngorms is mainly a bold and honest landscape that is the result of careful management not one which is contrived to be pretty. Its forests have come and gone with rapid change over the past two centuries; at all times the landscape has been considered to be outstanding.

Q22

Over rigidly applied protection of particular species and habitats on a very local scale is unnecessary and brings conservation into common disrepute and is counterproductive: CNPA should work towards finding solutions to habitat and species conservation that can assure enhancement by positive means.

Q23

Overlooked that for sustainable operations it is essential to have a sizable volume of timber that can be harvested in the summer i.e. sitka spruce. Scots Pine can only be cut in the winter.

Q24

Montane woodland management: this requires a targeted incentive that allows for the time and unpredictability of montane habitat management. The map shows a broadscale interpretation of where montane woodland might become established, there are many variables that will impact on this so the map should not be adopted as definitive.

Q25

National Policy should be supported, special policy for the Cairngorms is confusing and expensive.

Q26

Recreation; co-ordination- this is more involved than outlined; co-ordination is required between neighbouring estates, types of recreation user, other land uses, and funding bodies for health, learning, tourism, and point of use payment and sustainable land use all according to the four aims.

Q27

Please add work to reduce, mitigate and or compensate for the added overhead caused by the impact of designations and

Q28

In general agreed; however there are many more communities than those marked on the map.

Add enable existing small communities to grow at a rate acceptable to the community; as a minimum to enable local people to stay at home. Also give recognition to the scattered nature of traditional communities in the forests that should also be able to grow.

ENDS

09 December 2011

Cairngorms National Park Plan 2012-2017 – Draft Report

RSPB Scotland welcomes the production of this report and knows how important it will be in shaping the Cairngorms National Park during the forthcoming years. The RSPB is the charity that takes action for wild birds, other biodiversity and the environment. As the largest wildlife conservation organisation in Europe, we have over one million members of whom over 82000 live in Scotland. Within the CNPA area, we own and manage in excess of 13000 hectares of land for nature conservation on our reserves at Abernethy and the Crannach.

We believe that sustainability should be at the heart of decision-making. The RSPB's policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, marine issues, water, trade and agriculture. As well as commenting on national planning policy issues, the RSPB's professional conservation and planning specialists engage with over 1,000 cases each year throughout the UK, including regional planning, development plans and individual planning applications and proposals. We thus have considerable planning experience. The RSPB also makes over 100 planning applications a year relating to its own reserves and estate.

RSPB Scotland is currently active within the Cairngorms National Park in many ways. Amongst these are; managing land at Abernethy, Insh and the Crannach, running one of the top visitor attractions at Loch Garten, researching priority species (eg ring ouzel), providing significant input to projects on priority species conservation, including capercaillie, waders, black grouse, dark bordered beauty and pine hoverfly, playing key roles in groups such as the Speyside Deer Management Group, Wildlife Estates Initiative, RaptorTrack, Countrywatch and Raptorwatch but there are many others.

General comments

Overall, we thought this was an excellent document and we would fully support the thinking behind it and the direction that is suggested. It is a substantial improvement on the previous Park Plan and, whilst we have some comments regarding matters of detail, they should not take away from our view that this is a very good outline of how an agreed vision could be achieved. We look forward to working with the Park and other partners to achieve this vision on a wide range of issues but most particularly on achieving landscape-scale restoration of ecosystems, improving the conservation status of raptors and resolving conflicts between recreation and the conservation interest.

We have two overarching comments that apply to most if not all of the outcomes. The first is that the RSPB should be included in many of the tables as a body contributing to delivery of these outcomes. We do not intend to list them all but, essentially, we feel that we are very well placed to contribute towards any that relate to the management or promotion of the natural environment in its widest sense.

The second is that some of the targets appear rather arbitrary and we would welcome further discussion on how these were chosen, how they will be measured and against which baseline. This applies to many targets but is perhaps most pertinent to addressing the achievability of increasing the perception of 'wildness'.

Introduction

We welcome the statements reinforcing the Sandford Principle – that where conflicts exist between conserving and enhancing the natural and cultural heritage and the other three Park aims, greater weight is to be given to the former.

What should our focus be for 2012-2017?

In general, we support the proposed five-year outcomes though all should be underpinned by the need to conserve and enhance the area's special qualities. Where there is conflict between them then greater weight must be given to the conservation and enhancement of the natural and cultural heritage, in line with the Sandford Principle and we reiterate our view that true sustainability must form the core of all decision making and particularly those decisions taken affecting a National Park.

Five-year outcome 1 - "More people will learn about, enjoy and help to conserve and enhance the special natural and cultural qualities of the Park"

Whilst local people are mentioned in this section, it does seem more targeted towards visitors whereas we see both audiences as important. Could we also suggest the development of a publications series on wildlife of the Park which need not be just books, leaflets, etc but take advantage of current developments in digital technology eg phone apps?

Five-year outcome 2 – "The quality and connectivity of habitats will have improved, enhancing the landscape at a Park scale"

The prominence given in this section to native woodland and wetland restoration and expansion is most welcome to RSPB Scotland given our long history of working on these issues. This emphasis will continue and, indeed, increase with the inception of the visionary Futurescapes programmes of partnership working. However, we offer just one caveat that, whilst native woodlands and wetlands are important, their areas of expansion need to be carefully planned to ensure the least effect upon existing areas of high conservation value.

With regards to how these targets will be achieved, the SRDP and its successor will be important delivery mechanisms but by no means the only ones. We would be happy to work with the Park Authority to argue for appropriate levels of well-targeted funding to achieve conservation objectives.

Five –year outcome 3 – “The species for which the Cairngorms National Park is most important will be in better conservation status in the Park.”

We welcome the inclusion of an indicator that 100% of priority LBAP species will be the subject of active conservation projects. However, this does not seem to stem from any of the identified areas of work in the previous table. At the very least there should be some indication of the range of species that will be targeted (and particularly those for which there is no current action) and who might be involved in doing the work.

In addition, the outcome for the Wildlife Estates Scotland initiative is unclear and should be more focussed. Participation in the scheme is not enough – there needs to be measurable attainment of an agreed set of targets.

Five-year outcome 4 – “The qualities of wildness in the Park will be greater”

It appears to us that the aspiration “People will continue to be able to experience wildness throughout the Park” is unrealistic. We suggest, instead, the wording “People’s experience of wildness will be maintained or enhanced as far as possible throughout the Park”.

Whilst we acknowledge that this may be difficult to achieve, there needs to be stronger wording and action in relation to hill tracks. Despite several attempts in the past to curb their development, hill tracks have continued to proliferate in Scotland but particularly within the Cairngorms National Park and particularly on areas managed for grouse shooting. Any increase in the perception of wildness will be impossible to achieve without dealing robustly with hill track removal and footpath removal where appropriate.

We would be interested in discussing with the Park Authority ways in which the 2017 target of “10% increase in area characterised as high or medium wildness” might be achieved. In particular, we would wish to explore the emphasis to be placed on each of the four attributes of wildness given in the Supplementary Planning Guidance ie perceived naturalness, ruggedness, remoteness from road or track and absence from view of modern human artefacts.

Five-year outcome 5 – “There will be a better targeted programme of advice and support for land managers in the Park that delivers the National Park Plan”

This is an area of work where the RSPB has been heavily involved and this will continue and increase in the future, therefore, we fully support this outcome.

Five-year outcome 6 – “The economy of the Park will have grown and diversified, drawing on the Park’s special qualities”

The emphasis should shift from growing the economy *per se* to an appropriate growth - “the area’s special qualities will be sustained by a healthy, resilient and diverse economy.”

Five-year outcome 8 – “Business and communities will be successfully adapting to a low carbon economy”

We welcome the aspiration to have a system whereby land managers will be supported to maintain carbon stores in peatlands, soils and woodland. We would wish to work with the Park to bring that system about.

Five-year outcome 9 – “The Park’s communities will be more empowered and able to develop their own models of sustainability”

We read the Community Visions in Appendix 4 with interest and we would particularly like to work with the communities in Nethy Bridge, Boat of Garten, Kingussie and Ballater to develop areas of common interest.

Five-year outcome 10 – *The Park’s recreation opportunities will have improved the health and enjoyment of residents and visitors*

The impression is that during the last few years, recreation has been over-promoted in the Park to the detriment of the natural environment and we need to ensure that this is redressed. We would ask for an explicit statement here that “recreational development and activity must be sensitive to the area’s special qualities and not detract from them”. There should be a specific target that there should be no significant deterioration in the status of species of conservation concern attributable to recreation during the plan period.

Section 5 Managing competing demands on the land – land use strategy

We agree with the key principle – delivering multiple benefits.

Habitat assessments – these seem reasonably comprehensive though important wildlife should be mentioned as a strength in the rivers one and there are rare species in the uplands beyond those which are arctic-alpine.

Policy Directions

We support these with the caveat already expressed that existing areas of high conservation interest need to be safeguarded from woodland and wetland expansion.

If there are any questions relating to the comments above please do not hesitate to contact me.

Yours sincerely

RSPB Scotland

**DRAFT
CAIRNGORMS NATIONAL PARK PLAN
2012-2017**

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
THE PLANNING ETC (SCOTLAND) ACT 2006**

SUBMISSION ON BEHALF OF SCOTIA HOMES LTD

**MONALTRIE PARK NORTHEAST,
BALLATER**

DECEMBER 2011

EMAC PLANNING LLP, BALLINARD HOUSE, 3 DAVIDSON STREET, BROUGHTY FERRY,
DUNDEE, DD5 3AS

1.0 INTRODUCTION

- 1.1 This submission has been prepared by Emac Planning LLP on behalf of Scotia Homes Ltd in relation to land northeast of Monaltrie Park, Ballater. The site, which is within the control of Scotia Homes Ltd, is identified on Plan 1 below. Submissions have been made on the Cairngorms National Park Local Development Plan Main Issues Report supporting the site's inclusion in the Plan for an integrated mixed use development, comprising residential, business, recreation and community uses, together with other policy specific comments.

Plan 1: Site Boundary – Land to Northeast of Monaltrie Park



- 1.2 This statement supplements the attached comments form on the NPA's on-line portal. Scotia Homes Ltd welcomes the opportunity to comment on the Draft Cairngorms National Park Plan 2012-2017 and would be grateful if the following comments are taken into consideration.

2.0 COMMENTS ON DRAFT PARK PLAN

Question 4: Do you think the long-term outcomes should be updated and condensed? If so, how?

- 2.1 Scotia Homes Ltd supports the long-term outcomes of the first National Park Plan, including supporting the objectives for delivering a special place and creating a sustainable economy. It is considered that the 12th objective, under creating a sustainable economy, should be prioritised and elevated in the list that is, delivering economic, social and environmental sustainability, since this balances a number of future aims for the Park. The prioritisation of objective 13 to achieve housing of all types, which “... will be of good quality and new development will implement sustainable design principles” is also supported. As part of a mixed use development, these objectives will achieve successful high quality environments where people want to live and work, and which will achieve National Policy objectives set out in Designing Streets and Designing Places.
- 2.2 The objective on page 19 to ensure the Cairngorms National Park is a special place where the natural and cultural heritage is conserved and enhanced is supported. The role of land owners and managers play in shaping the special qualities of the Park is noted and this can be achieved within new developments to further enhance these qualities and seek to further enhance the Park’s heritage.
- 2.3 In terms of the objective on page 20, to develop a sustainable economy that supports thriving and resilient business and communities, the Plan recognises that more than 250 affordable houses have been built in the Park in towns, villages and countryside, through both public funding as well as private contributions from house builders and landowners. The objective to provide for further such housing is supported, albeit, that it is considered that the Plan should support more innovative measures/models for its future deliverability. Specific comments on the Local Development Plan Main Issues Report are relevant to this issue.

- 2.4 Page 22 identifies some of the challenges the Park will face to 2017, amongst these is the collective challenge of reduced public spending, stating "... This affects both what the public sector can do itself and what it pays the private and voluntary sectors to do." Overall, the stated objectives lack recognition and support for the role of the private sector in achieving its underlying aims and the importance of the public sector working in partnership with the private sector in this economic climate to achieve the objectives of the Plan.

Question 5: Do you agree this set of outcomes provides the right focus for the next five years? If not, what else is more important?

Question 6: Which are the most important outcomes to you?

- 2.5 On page 23 the Park identify that the organisations who deliver the National Park Plan should focus their work on over the next five years to make further progress towards the Vision. Scotia Homes Ltd is supportive of the vision and in particular objective 7, which states "Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park. [page 45]" Scotia Homes considers that this should also include support for sustainable mixed use development.

Overview and General Comments on Questions 12, 13 and 14: Support for a Policy on Mixed Use Development

- 2.6 The following comments made by Scotia Homes Ltd relate to the importance they place on achieving sustainable mixed use communities and provide a context for the following more detailed comments on Questions 12, 13 and 14. Although, it is recognised that this consultation seeks responses to individual questions, Scotia Homes Ltd would welcome a single policy, combining the underlying objectives of these questions, encouraging and promoting public and private sector partnership on achieving sustainable high quality mixed use developments.

2.7 It is considered that the encouragement of mixed-use development should be given even more priority and credence in the Park Plan, for the following reasons:

- Historically, the main failing of the development planning system has been that it has not insisted on mixed-use development for all or most development. Mixed-use, be it a mix of residential and work, leisure, civic, etc or a mix in size, with a range of small to large, flats to houses, small offices to factories, is a fundamental part in being able to create sustainable, walk-able communities.
- Relatively few uses, including employment, ancillary retailing, recreational and community, need to be located separately from and further away from residential dwellings. A variety of appropriate uses should be fully integrated within a well-designed mixed community, allowing people to live, work and enjoy themselves all within walking distance and creating a sense of neighbourhood.

2.8 In support of this Scottish Planning Policy (SPP) 2010 identifies in paragraph 46 that “Planning authorities should ensure that there is a range and choice of marketable sites and locations for businesses allocated in development plans, including opportunities for mixed use development, to meet anticipated requirements and a variety of size and quality requirements.” National Planning Framework 2 also encourages such developments stating “The promotion of compact settlements, mixed use development, effective active travel networks and efficient public transport systems can play an important part in reducing the need for car-based commuting.”

2.9 Having regard to National policy it is considered that the Park Plan should include a strategic policy encouraging mixed use sustainable development on sites of an appropriate scale. Within this context the following specific comments are made on questions 12, 13 and 14 underpinning the justification for a new strategic policy on mixed use sustainable development.

Question 12: Five-year Outcome 6 - The economy of the Park will have

grown and diversified, drawing on the Park's special qualities.

A Do you agree that five-year outcome 6 is an appropriate one for this National Park Plan to 2017?

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

2.10 Having regard to the benefits the Plan seeks by 2017 (page 42), Scotia Homes supports the need to attract people who want to work here, together with economic growth to support vibrant economic growth.

2.11 The Plan should, however, clarify that a generous supply of effective new housing land, as part of mixed use proposals, is required over the Plan period, not only to achieve its affordable housing objectives, but also to support the economic growth objectives identified on Page 42. This approach is supported by both national policy in the form of SPP and also by the National Planning Framework 2, as follows:

- Paragraph 25 of National Planning Framework 2 (NPF2) supports the need to deliver homes in both the rural areas and urban areas, despite the economic decline, stating that “notwithstanding the consequences of the current downturn, there remains a pressing need for the planning system to help deliver growth in the long-term supply of new homes throughout both urban and rural Scotland to respond to long-term housing pressures and to improve the affordability, stability and fairness of Scotland’s housing system”
- Paragraph 71 of SPP states that “Allocating a generous supply of land for housing in the development plan will give the flexibility

necessary for the continued delivery of new housing even if unpredictable changes to the effective land supply occur during the life of the plan.”

- 2.12 Scotia Homes is prepared to work with the National Park, the community and other interested parties to achieve these objectives, in partnership, thereby contributing private sector finance to the delivery of future sustainable mixed use developments within the Park. Whilst the use of employment targets is noted, these should be more closely linked with targets for the increase in population and other community uses??

Five-year Outcome 7: Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park.

Question 13

A Do you agree that five-year outcome 7 is an appropriate one for this National Park Plan to 2017?

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

- 2.13 The identified criteria for delivering this outcome is supported, however, as stated above Scotia Homes Ltd is committed to achieving these principles through sustainable mixed use developments and consider this should be added to the criteria concerned. This would support national planning policy objectives identified through Designing Streets and Designing Places.

- 2.14 In support of the above approach, the Scottish Government identifies in its publication on “Delivering Better Places in Scotland” 2010, that “Better place design, particularly through creating greater diversity in choice of housing and improving access to other services, can provide opportunities for people to remain within their communities as their circumstances change over time.”
- 2.15 The initiation of proactive and good practice guidance is welcomed, subject to further consultation on its content. It is also considered that the private sector should be included in the deliverability of “who has the expertise and resources to make it happen”. Scotia Homes has a proven interest in this area, illustrated through the promotion of the Enquiry by Design process on masterplanning of future development sites and they would welcome the Park’s endorsement of the private sectors involvement and partnership in the urban design process.
- 2.16 It is considered that the number of indicators should be extended beyond High Street improvements to include all developments over a specified scale, perhaps using ‘major’ developments as an initial target indicator for the first 5 years.

Five-year Outcome 8: Business and communities will be successfully adapting to a low carbon economy.

Question 14

A Do you agree that five-year outcome 8 is an appropriate one for this National Park Plan to 2017?

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

- 2.17 The principle of developing such a Policy is supported, together with percentage targets, which encourage and support high resource efficiency standards rather than prescriptive requirements in every case. Scotia Homes Ltd is prepared to seek to achieve these targets where these do not undermine the deliverability of projects, which, of course, may also need to take into account other developer requirements.
- 2.18 Whilst the Climate Change (Scotland) Act 2009 may introduce requirements on Authorities to address this issue, SPP is clear that the role of Development Plans is to guide development to promote a “pattern” of development which is sustainable and to require the siting, design and layout of all new development to limit likely greenhouse gas emissions, particularly by limiting resource and energy requirements (Paragraph 42). Scotia Homes Ltd would support an approach which incorporated ‘targets’ for energy reduction, but which also placed an emphasis on securing an appropriate ‘pattern’ of development as advocated by SPP. Detailed submissions on this issue have been submitted in relation to the Cairngorms NPA LDP MIR.

Five-year Outcome 9 - The Park’s communities will be more empowered and able to develop their own models of sustainability.

Question 15

A Do you agree that five-year outcome 9 is an appropriate one for this National Park Plan to 2017?

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

- 2.19 Page 51 of the Plan states “...It can’t itself resolve the individual issues facing each community, but it can put together the tools for communities to tackle things themselves with support from the right organisations. This means providing the right sorts of training and skills development, advice and support to develop plans and projects, and improving both communities’ and public sector agencies’ ability to work together.”
- 2.20 Scotia Homes Ltd would welcome the endorsement of the private sectors involvement in this partnership role to achieve some of the proposed outcomes, through community engagement. There will clearly be private sector involvement and associated funding on some futures projects and developments in the Park. Although this policy is supported, it is considered that the Plan should be clear that aspirations can only be achieved where relevant funding is in place or where new developments are can make funding viable.

Page 57 - 5 Managing competing demands on the land – land use strategy. This section of the draft therefore seeks views on:

- **A key principle for land use – delivering multiple benefits (pages 57-58)**
- **The issues facing land use (pages 59-66)**
- **Proposed policy directions (pages 66-82):**

Question 17

Do you agree with the key principle?

Question 18

If not, why?

- 2.21 Scotia Homes Ltd supports the Plan’s aspiration to provide strategic direction and a framework to help achieve the most for the different interests in the National Park. However, it is noted on Page 58 of the Plan that the principle to guide land use decisions is suggested as “The management and use of land in the Cairngorms National Park should deliver multiple benefits – delivering the best possible combination of the National Park Plan’s longterm outcomes, always ensuring that the special

qualities are conserved and, where possible, enhanced.” Whilst this is endorsed, it is too limited in its scope and fails to accord fully with the four aims for Scottish National Parks set out by the National Parks (Scotland) Act 2000. In particular, if this principle is to guide ‘land use planning’ it should also include the sustainable use of the natural resources of the area and the promotion of sustainable economic and social development of the area’s communities.

Policy direction 8 - Develop sustainable patterns of settlement growth, infrastructure and communications

Question 28

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

2.22 Page 80 identifies that “Achieving the vision for the National Park needs communities that are sustainable in economic, social and environmental terms. It needs settlements that create a sense of place, where people want to live and work, and that encourage mixed and balanced communities.

2.23 Scotia Homes Ltd made comments on the LDP MIR supporting the detailed options and also support the preferred policy approach of the Draft Park Plan, in summary, they consider that the strategy to direct new development to areas most suitable to accommodate it should be supported, whilst ensuring a sustainable approach to the mixed use development. On a site-specific basis, the Proposed LDP should retain a commitment to either sites which have planning permission already, or “maintains the status quo” and include sites already included in the adopted Local Plan.

3.0 CONCLUSION

3.1 It is respectfully requested that the above submissions are taken into consideration in the preparation of the Park Plan and Scotia Homes Ltd would be happy to discuss any of the comments made or provide for further clarification.

National Park Plan Consultation

Introduction

Thank you for the opportunity to comment on this draft document. The NPP offers a logical progression from identifying the special nature of the Cairngorms National Park through to identifying the issues which influenced the first NPP, the changes that have taken place since the first Plan and the vision to 2017 and beyond. Having said that, it is a piece of work which lacks any sense that the vision of the 2007 Plan, which we firmly supported, is in safe hands and that many of the problems that were identified have been resolved in any way or even can be resolved. In short, SCNP believes the Park Authority is using a veneer of 'green thinking' to dress up the policies of a development agency rather than a national park authority which is charged with finding 'new ways of doing things'.

We have set out our basic arguments against the direction of travel that the NPA has adopted in the accompanying Main Issues Report, so we will restrict our comments here to the more philosophical issues that an NPA should be addressing as it wrestles with the concept of sustainable development. Our only comment on the vexed issue of housing supply is that the hole which the Authority has dug for itself over An Camas Mor and the exclusive use of cross-subsidy from open market housing to supply affordable homes seems to be getting deeper. The policy is bankrupt and the NPA should be seeking opportunities to extricate itself from the position in which it finds itself.

What is inexplicable is the Park Authority's approach to this issue when it quite rightly argues to be spared from developments, such as wind farms outside the boundary or the Beaully-Denny line inside the Park. The NPA's argument for the Park to be nationally recognised for the special qualities of its landscape or its natural and culture heritage values would carry more weight if it also argued consistently for a housing supply mechanism which addressed the actual need for housing rather than the bulk supply method adopted. In reality, it is a dishonest position which does not deserve respect and it will continue to be the main bugbear to a positive relationship with environmental NGOs which the NPA needs to have if it to be seen as credible.

National Park principles

We agree with the principles as they stand but would draw your attention to the way that Loch Lomond and the Trossachs National Park, in its draft NPP, has set out its context within the world of protected areas. It is crucially important for Scottish national parks to be seen as Scotland's contribution to the world's protected areas if we are to maximize their potential as vehicles for developing conservation messages and for developing the idea that humans and nature can co-exist or indeed synergise as long as the ground rules for sustainability can be honoured.

Reference is made to engaging with local communities to effect good sustainable practices, but unlike the climate change principle the document is rather coy about the effect of the Park's housing policies (producing housing in excess of actual need) which are self-evidently every bit as damaging to the special qualities of the Park as misplaced wind farms. Indeed, given their effect on the cultural heritage they are doubly damaging. SCNP will continue to

press the charge that house building in an environment of special quality does not amount to sustainable development, nor does it enhance biodiversity. These are the loose phrases we have become used to as the NPA has sought to justify its more grotesque housing developments. House building is to all intents and purposes an extractive process as far as the environment is concerned and it is largely irreversible. Having said that, we recognise that sacrifices have to be made to accommodate Park residents, but the footprints for such developments should be minimised as far as possible to include only the required amount of housing and buffers should be put in place to prevent unnecessary disturbance to natural heritage interests. Above all, any development in a national park should be of the highest quality to reflect that it is a special place and a shop window to the world. Recent developments, under the supervision of the NPA have failed spectacularly to live up to the national park quality label – High Burnside, Robertson’s development in Aviemore and Kincaig to name but three.

Question 1. What makes the National Park special to you?

The scale of the landscape, the combination of the mountain massif and wide heavily wooded straths, with remnant Scots pinewood, the knowledge of the presence of iconic species, the essence of wildness.

Questions 2 Do you agree with these descriptions of the special qualities

Yes, largely

Question 3. Are there other special qualities you think should be explicitly identified in the National Park Plan?

Important wetlands, Bog woodland.

Question 4. Do you think the long term outcomes should be updated and condensed? If so how?

No. If anything they should be expanded. This is a complex environment which as stated is multi-layered. Amongst other things the purpose of the NPP is to set the scene and framework for management decisions. It is proposed as a partnership document which necessarily means that the partners have to understand fully the implications of any decision on the special qualities of the Park. These decisions should be informed decisions with the evidence in writing to back up the NPA’s stance.

Question 5. Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

Outcome 7 should read, ‘Settlements and built development will regain, retain and enhance the distinct sense of place and identity within the landscapes of the Park.

In addition we would like to see a major move to scientifically based decision making. We would therefore add,

Through appropriate research, the NPA will be better informed about the ecological status of the Park’s land and water resources to enable it to make improved science-based decisions on land use.

Question 6 Which are the most important outcomes for you?

We would like to see major improvements in quality and quantity of the natural heritage and the ability of residents and visitors to appreciate it sustainably. Outcomes 1,2,3,4,5 are all relevant to this. We would also see outcome 7 as crucial to the sense of place.

Question 7. Do you agree that five-year outcome 1 is an appropriate one for this National Park Plan to 2017?

Yes. We would like to see a special duty placed on the Ranger Service to deliver aspects of this outcome. Indeed we would suggest that it becomes a priority in a structured programme over the next five years. We would also suggest that this would have added benefits for the Ranger Service itself in developing an esprit de corps to a common objective.

Question 8. Do you agree that five-year outcome 2 is an appropriate one for this National Park Plan to 2017?

Yes. The NPA has to make a real and measurable improvement in the area of land amenable to conservation habitat development. Opportunities for landscape-scale approaches through combined and integrated participation of adjoining estates would be given a major boost if the NPA negotiated a position of influence vis a vis the Government's Land Use Strategy and the SRDP moving to a more agri-environment emphasis in 2013.

The promotion of woodland as a carbon store should reflect the quality of habitat as opposed to a simple, additional acreage under trees. With wetlands there is an opportunity to re-introduce iconic species such as beaver and crane or at least prepare for their re-introductions during the life of the Plan. Examination of water resources amenable to improvement in ecological status, should be attempted, within the life of the Plan, given the low target improvements envisaged by SEPA in its River Basin Management programme.

The Feshie Deer Management Plan should be closely monitored using indicators which display the benefits for other like minded estates.

Question 9. Do you agree that five-year outcome 3 is an appropriate one for this national Park Plan to 2017?

Yes. As stated above, serious consideration should be given to re-introductions of star species to generate pride in the natural environment within the Park's communities. This has happened on Mull with the natural dispersion of sea eagles but it is a recurrent phenomenon eg. Lammergeirs in Austria, Great Bustards on Salisbury Plain, even wolves in Yellowstone.

Question 10. Do you agree that five-year outcome 4 is an appropriate one for this National Park to 2017?

Yes. Wild land is one of the key characteristics of the National Park and a crucial component of informal recreation. It is also precious as a refuge for species such as the Golden Eagle and some species of wader, so its sensitive management is important for the identity of the National Park. We agreed with the Wildness Policy recently developed by the NPA, but also encouraged it to include lower ground areas where, through tree cover and screening, it is

possible to appreciate a sense of wildness without having to travel long distances from human habitation.

Question 11. Do you agree that five-year outcome agreement 5 is an appropriate one for this National Park.

Yes. The experience of other national parks in England and Wales suggests that there is a great opportunity to develop a special relationship with landowners and managers through offering a one stop shop mechanism to access grants. It would be even better if the NPA could offer top up grants for special effort to boost national park values and find ways of developing grants that Government schemes are not flexible enough to offer. For such a proposition though there would need to be cast iron guarantees that schemes would be properly resourced and efficient in the distribution of funds.

Question 12. Do you agree that five-year outcome 6 is an appropriate one for this National Park?

In current circumstances it is difficult to place any credence on economic forecasting. With the high cost of fuel for transport and domestic use it may be a question of survival over the period of the Plan. Without knowing the statistics on business start-ups and the latent capacity within the local communities for growth of new businesses, it is impossible to predict these outcomes. We agree with the need for an energetic business support mechanism, but this may be difficult to finance through the enterprise agencies.

Question 13. Do you agree that five-year outcome 7 is an appropriate one for this National Park?

Yes, but it is difficult to know where to begin in trying to understand the philosophy of development which the NPA supports. Almost every example of new build housing development containing more than one or two houses, which has occurred since the Park was established, has failed to retain the indigenous character of settlements, far less enhance their character. The starting point in defining that indigenous character is to accept the values expressed by their residents which refer to their outstanding, planned nature and their use of local stone. They are part of the landscape.

Modern harled bungalows and villas packed into close fitting developments have markedly degraded that cultural heritage over the past 20 years and, sad to say, with an increasing pace around the time when the Park was established and since. The current Local Plan exacerbated this trend by continuing to identify housing land allocations fitted to the operational requirements of large scale developers and made worse by the cross subsidy approach which has led to higher densities and poor design standards. Since it is the intention of the NPA to keep the existing land allocations into the LDP, it is difficult to see how village character will be retained, never mind regaining some of the lost ground of indigenous character. In practical terms, a wholesale reversion to stone built properties is perhaps asking too much. It therefore seems obvious that the only alternative will be to lessen the visual effect of new build by supporting well screened, small scale developments.

Question 14. Do you agree that five-year outcome 8 is an appropriate one for this National Park?

The proposed outcome is fine, but the delivery is far from convincing. The NPA needs to identify the main drivers which will influence the move to low carbon and take a lead where it can. However, apart from influencing land use, most of what needs done will be down to national government, given the scale of the changes required. What the NPA can do is make known to the nation at large the huge contribution which unimproved land and native woodland can contribute through sequestration and build a sense of a community on the front foot when it comes to tackling the issue.

Question 15. Do you agree that five-year outcome 9 is an appropriate one for this National Park?

Experience suggests that the success or failure of initiatives in individual villages will require village champions to take the lead. The NPA could usefully identify such people for further training and introduce an award programme to encourage best practice.

Question 16. Do you agree that five-year outcome 10 is an appropriate one for this National Park?

Yes. It is an important role for national parks to be seen as making a significant contribution to health and wellbeing. As well as joint working with the health authorities schools within the park should be encouraging pupils to live an active life, making use of Park resources.

Managing competing demands on the land

Question 17. Do you agree with the key principle?

Yes. The concept of public benefit should be extended to the idea of public goods where society recognises the often intangible contribution that a high quality environment can deliver and guards it jealously because it recognises that its loss is everybody's loss. This also relates to the ecosystem services approach where a determination is made to measure those contributions without which life would be unsustainable. The NPA could usefully initiate a research topic into the costed contributions from the Park's natural environment along the lines of the Pearce Report of the 1990s.

Question 19. Do you agree with the opportunities and threats identified, if not why not?

Yes, largely. The opportunities associated with farmland should include an initiative to farm for wildlife benefits more so than simply 'enhancing habitat networks'.

Question 20. What are the particular opportunities and threats that you think the Plan should address between 2012-2017?

In respect of habitat management the most obvious threat is the continuous degradation of grasslands and moorlands by overgrazing, particularly by deer. Woodlands also continue to be threatened by inappropriate development, much of it self-inflicted by the NPA through its own policy decisions. The main opportunities arise from the convergence of the Government's Land Use strategy as a vehicle for creating new initiatives and the very fact that the NPA has a responsibility to find new ways of doing things which are truly sustainable.

Policy direction 1. Enhance the special landscape character

Question 21. Do you agree with the proposed approach?

Yes, on the whole. We are concerned about current moves to rationalise National Scenic Areas within national parks if it means that the NSA tag is simply absorbed into the NP designation. If anything, as the premier accolade, NSAs within national parks should be strengthened with better management regimes and better accessibility. Our problem over this issue is one of trust where there is a glaring example of the NPA actually demolishing part of the Cairngorms Mountains NSA to secure a new town of 5,000 residents with all its accompanying infrastructure – hardly an approach, consistent with its primary duty to conserve and enhance the natural heritage.

Policy direction 2. Enhance biodiversity

Question 22. Do you agree with the proposed approach?

Yes. We do have concerns, however, about the statement to have ‘no net biodiversity loss’, given the current level of knowledge available for EIAs. There needs to be a step change in knowledge of the likely effects of development on biodiversity and a more rigorous examination of the application of the precautionary principle. It is SCNP’s view that within a national park, to borrow a phrase, ‘it is not business as usual’ and NPAs have to boost their expertise so that environmental assessments are not developer-led as at present. For proper, science-based decision making to underpin the work of the NPA, as it should, it is for the NPA to take the lead and recharge the developer if necessary.

Policy direction 3. Expand and enhance woodland

Question 23. Do you agree with the proposed approach?

There are dangers here for the conservation duty of the NPA. We agree with the need to expand woodland in line with climate change considerations, but within a national park where there is an aspiration to use alternative fuels, means must be found to marry production of wood fuel with conservation considerations. Certainly we accept that at a level of 20% cover, there appears to be an ostensible margin for increasing the woodland area to something like 25% (European average of 35%). However that 20% figure presumably includes the mountain massif itself, so that a realistic assessment of the potential for expansion needs to be made. We would also be concerned about any expansion into exotic conifer or exotic, fast growing hardwoods.

Policy direction 4. Enhance resilience of habitats and land use to climate change.

Question 24. Do you agree with the proposed approach?

Yes, we are in agreement with all the policy approaches here.

Policy direction 5. Contribute to low carbon economy

Question 25. Do you agree with the proposed approach?

Yes

Policy direction 6. Provide high quality recreation opportunities.

Question 26. Do you agree with the proposed approach?

Yes, with the emphasis on quality. This will require pro-active leadership on the part of the NPA to understand what is happening on the ground so that conflicts with conservation and land management concerns are minimised.

Policy direction 7. Target proactive advice and public support to help land managers deliver multiple benefits?

Question 27. Do you agree with the proposed approach?

As stated previously, the NPA needs to negotiate a position of influence, where it can offer a one stop shop of advice to develop national park values and at the same time offer a hierarchy of opportunity for land managers to develop more public benefits. Loch Lomond and Trossachs NPA already have an agency role in respect of the SRDP to help build the one stop shop.

Policy direction 8. Develop sustainable patterns of settlement growth, infrastructure and communications

Question 28. Do you agree with the proposed approach?

Absolutely and fundamentally no; we have stated in our response to the Main Issues Report that other national parks, in particular the Peak District National Park have taken a different approach to resolving the problem of maintaining well balanced, sustainable communities. It is our view that the CNPA will not achieve its objectives here because it has entered into a self-perpetuating cycle which will result in more commuting to conurbations outside the Park, more holiday and second homes inside the Park and an attractive location to retire with all the modern conveniences. The NPA is also inconsistent since it has moved from predicting a stable population in the first NPP to describing a 20% increase in population over the next 20 years. Virtually all of that increase will come from inward migration.

We understand that in total there will be the order of 3,000 house allocations made available over the next 20 years, equating to an additional 9,000 people perhaps, which conflicts with the predicted population figure. On the face of it, that represents a 50% increase on the existing population. The vast majority of this additional population will be housed in the most conservation-sensitive, low lying area of the National Park in Badenoch and Strathspey. We believe this represents a dereliction of duty on the part of the Authority to hold all four aims in balance, never mind hold to the primacy of its conservation duty when there is conflict with development.

There is already evidence within communities of resistance to the prospect of evermore new housing appearing on the outskirts of rural villages. Such developments create social cohesion tensions and are directly contrary to the NPA duty to conserve the cultural heritage and sense of place.

The implications resulting from the imposition of the biggest development within the Park at An Camas Mor are so contradictory to the aims of a national park that it is impossible to be sanguine in the face of such bureaucratic stupidity. This will be a failure as big as the

1960s growth of Aviemore was a failure. Have we learned nothing from the mistakes of the past? The principles agreed for the management of the development are spurious, contradictory, and unachievable.

Main Issues Report

Introduction

Thank you for the opportunity to respond to the consultation on the Main Issues Report of the Local Development Plan process. As an organisation which meets regularly with CNPA officers, we are familiar with the context of the Authority's proposals for the Cairngorms National Park. We found the recent, joint meeting of NGOs and CNPA members and staff particular helpful in fleshing out some of the thinking that has gone into the document.

We note that there was a great deal of common purpose and agreement on most of the issues which arose in Pitlochry, but regrettably little indication of a shift to more radical thinking in regard to future housing development. Most significant to us is the fundamental disagreement over the nature and scale of housing development, where we see little to convince us that the CNPA will resolve the issues over local needs housing without severely damaging the special qualities of the National Park. We are particularly aggrieved, although we understand the political pressures, by the inclusion of An Camas Mor as a central focus for development in the NPP for the first time. We note that the Reporters to the Local Inquiry were highly critical that its justification for being in the Local Plan was altogether inadequate and much work was needed in regard to identifying the totality of housing need, village by village and in addressing major concerns over environmental issues. We see no evidence that these issues have been adequately addressed, albeit that the Authority undertook to do the work in preparation for the new LDP. The Authority remains wedded to a notion which is fatally flawed in concept and practice and the National Park will be much the poorer for it.

Background

Before responding to the set questions, we want to lay out in detail, an alternative vision for housing supply in the National Park. We do this because we feel that a new paradigm is required to enable communities to be properly housed without the concomitant gross overdevelopment which has happened in the past and is still happening today. Such development has already rendered Aviemore an urban sprawl of epic proportions (even more than it was already, before the National Park was established) and is in the process of ruining other villages, particularly in Badenoch and Strathspey. We also note from the survey work in preparation for the NPP that for local communities and visitors one of the characteristic values of the National Park, relating to its cultural heritage, is the predominance of planned, stone built villages. A continuation of that value and that vision is not best served by the approach being taken by the CNPA in regard to housing policies, apart altogether from the environmental issues.

SCNP have been informed through a combination of desk-top study and personal communication of how other national parks have dealt with local needs housing. We are currently involved in more detailed research using evidence from the Peak District National Park in England. It is salutary to find that with a similar problem of having to find means to retain a young, economically active population in the settlements of the Peak Park through

provision of affordable housing, that the NPA has chosen solutions which have been eminently successful in achieving that objective over the last 20 years. Its starting point was a statement which, by comparison, does not feature in the CNPA's Main Issues Report, viz. *'Opportunities for providing housing in the National Park without damaging its environmental qualities are diminishing. The supply of land is finite, whilst the demand for housing is insatiable.'* The situation pertaining in the Peak Park has similar characteristics to that of CNP – a propensity for encouraging a commuting population who want to live in the Park and travel to work in surrounding conurbations; a desire for second homes as investments or for holiday purposes; a migration of retirees to rural idylls and a housing supply which is beyond the means of indigenous young people to access the housing ladder. The population projection, unlike CNPA, is to have a stable population to safeguard the special qualities of the National Park. We note that CNPA want now to operate on a presumption of a 20% increase in population over the period of the next 20 years without justifying this increase from the stable population projection of the first NPP, other than its being implied from the availability of housing in the future. Such thinking has all the hallmarks of a self-perpetuating cycle which will inevitably lead to further degradation of the natural and cultural heritage.

To achieve its objectives the Peak Park has determined that it needs to focus its land use planning for new build housing on delivering affordable homes and to dispense with the need for open market housing as a *quid pro quo* for developers. Indeed it states in SPG, Affordable Housing, that, *'cross subsidy, whereby higher priced homes can be used to subsidise the provision of affordable homes is (also) inappropriate. This is particularly so in the National Park where cross subsidy can be seen as selling off the environment to subsidise housing.'* Of necessity, it operates occupancy conditions based on residency criteria or employment needs to avoid the problems of providing housing excess to requirements. The only exceptions to new, affordable housing provision are housing for longstanding residents such as retiring farmers or for employment needs or where a vernacular building can be suitably converted to domestic use.

Most fundamental to the Peak Park's land use planning approach is that land allocations operate on the basis of a rural exceptions policy, (Annex B of PPG3 (March 2000) which advises that exception sites cannot be identified in local plans. It states, *'the rural exceptions policy has been considered the most appropriate way that the land use planning system can help make affordable housing available to people with a longstanding connection to the Park... Sites which otherwise would not have been released can be given consent for local people. Such sites tend to be small scale and can be located within or on the edge of the Park's settlements.'*

SPG, Affordable Housing states *'that this approach has stood the test of time being reaffirmed in PPG3 and the Rural White Paper (Autumn 2000). In fact the latter recommends greater use of this method. It is interesting to note that NPAs have the best record throughout the country for providing affordable housing through the rural exceptions policy.'*

We regard the above approach as enlightened in relation to the special position of national parks. It contrasts markedly with the situation in Scotland where the recent advice from the Chief Planner of 4 November 2011 to avoid occupancy restrictions, makes no reference to national parks, but does accept that there will be a need for tighter policies where there is a

danger of suburbanisation of the countryside. We will be seeking to lobby the Minister to make a special case for national parks to be excluded from the generality of this advice.

Perhaps the most salutary test of the success of the Peak Park policies is the fact that land values for affordable housing remain relatively low by comparison with those outside the Park's boundaries – by a factor of 10-20 times (£10,000 as opposed to £100,000-£200,000).

What would a paradigm shift entail? For SCNP, our stance is that the Authority needs to base its housing allocations on a critical assessment of need, village by village. There should be a presumption against large land allocations for new build housing and whilst we agree that housing development should be contained within existing settlements, the anticipated large increase in provision in Badenoch and Strathspey does not reflect national park values. Indeed it is contrary to those values and risks bringing the Park Authority into disrepute. To safeguard the national park brand, the NPA needs to reverse its oversupply of housing land and follow the example of the Peak Park and limit housing development to that required for a stable population.

Turning to the list of issues: -

Issue 1 How can we protect the special qualities of the Park and provide clarity on where development should and should not go?

Option 1 is inappropriate. Option 2 will not of itself deliver NP values. Whilst we agree that policies need to be clear and that there should be as much advice as possible, there needs to be a principled approach to development. Does it serve NP purposes? Is the scale appropriate? Does it meet the desired cultural heritage values? Is it distinctive enough to mark it out as being in tune with local vernacular styles.

Issue 2 How do we plan for the sustainable use of the existing resources and respond to the effects of climate change such as water, energy, waste, carbon.

Whilst accepting Option 3 as the preferred option, the text acknowledges that the present consumption regime within the Park's communities is unsustainable. Proposals for the current rate of house building, given the inherited allocations from the first Local Plan, with its dependency on large travel to work distances for those commuting to Inverness or further afield, flies in the face of the preferred option. The NPA needs to offer leadership in sustainable development, but its position over the housing issue lacks credibility and invites ridicule.

Issue 3. How and where can we make sure communities have what they need – jobs, tourism options, facilities etc?

Clearly, Option 2 which allows different communities to differentiate themselves by growing at their own pace of economic development is closer to NP values of organic growth, but it sits uneasily with the NPA determined, large housing allocations which will completely swamp, in some cases, the nature and feel of some local communities. It will also be a sensitive balancing act to ensure that there is equal accessibility to the various levers for sustainable development. An Camas Mor cannot seriously be described as a sustainable

community unless every householder works within the community or in nearby employment. As far as we are aware, there is no mechanism for determining that An Camas Mor will not follow the recurrent pattern of large scale second home ownership or as a commuter dormitory for Inverness.

Issue 4. How and where can we meet the housing need in our communities – open market, affordable, local needs?

Picking up on the Peak Park's solution, we believe the vast majority of new housing should address the need for affordable homes.

Issue 5. How and where should development happen in the National Park?

Paragraph 9.12 states that, *'in the light of the existing planning consents, we believe that there are no reasonable alternatives to the current approach.'* There lies the difficulty the CNPA has in consulting with environmental NGOs. Our position follows that of the Reporters to the Local Inquiry who observed that the CNPA had an opportunity with the existing Local Plan to start afresh and create new paradigms for land use planning and not follow the pattern set by constituent planning authorities. It chose not to do so and finds itself in a bind. It admits that the inherited housing allocations have created a problem, for instance in Aviemore, which will require to be remedied by a process of *'greening'*. Such a situation may be seen as *'realistic'* by the CNPA but it is far from the principled approach that a national park authority should be adopting in relation to sustainable development. We agree that there has to be a settlement hierarchy and that virtually all development should be contained within existing village envelopes, but the current *modus operandi* of the CNPA is a populist approach to land use planning – find the line of least resistance, take the environment as a flexible friend which can be adapted to suit immediate needs, irrespective of long term damage, and carry on until the same issues re-occur further down the line. We anticipate future relaxations in the settlement boundaries to address the same issues as currently occupy the Authority. Such a prospectus was and is almost wholly avoidable.

We have already stated that An Camas Mor is a fatally flawed concept which rides roughshod over designated sites and will not achieve the objectives of a sustainable community as defined by the adopted principles. It also highlights a logical inconsistency in the NPA's approach to development patterns since An Camas Mor is seen on the one hand as absorbing main development pressures in Badenoch and Strathspey, while on the other, there is acceptance of the need to provide housing where it is required in individual villages. Other than that we do not intend to comment further on the detail of Issue 5 relating to individual settlements.

Issue 6. How do we plan for development that supports our rural areas – follow the existing patterns of development or take a different approach?

Option 3, the preferred approach, is really the same as Option 1, the ad hoc approach because it is based on flexibility. What is required is a set of presumptions to guide development to where it can do least damage to national park values. Option 3 is effectively a relaxation of the current Local Plan which steered development to existing settlements. SCNP prefers the Option 2 approach of focussing development within the settlement

envelopes and developing a set of presumptions to allow for meritorious development in exceptional cases.

Issue 7. How can we help people move around the Park – local access, tourists, people travelling through the Park?

The most significant development on the horizon is the proposed dualling of the A9. As a National Park Authority, this should be a main issue in terms of respecting national park values. Means will have to be found to maintain connectivity for wildlife and appropriate access and crossing points for local communities and visitors. Option 2, the preferred approach, obviously has the advantage of being an informed approach but the reference to planning gain from developments, on the past and current performance of the NPA simply suggests to SCNP that the National Park environment will take the hit.

Other Issues

SCNP is sorely disappointed in this Main Issues Report. We accept that there are fine words about an ecosystems approach and the need to pay heed to national park values but the direction of travel in respect of land use planning is more of the same failed policies from the past. There are those now, nationally and internationally, who are beginning to question whether the land use planning and management policies of the CNPA are compatible with the NP designation. We share those concerns.

Bill McDermott

07 December 2011

Response to Cairngorms National Park draft Park Plan 2012-2017

Scottish Enterprise (SE) is pleased to submit a response to the consultation exercise on the Draft National Park Plan 2012-2017 for the Cairngorms National Park.

SE has a long established connection with areas both within the Park and surrounding the Park, with a focus on Royal Deeside and Highland Perthshire. This has been mirrored by investment in visitor infrastructure such as the restoration of Victorian shop fronts in Deeside and the development of the Highland Fling bungee at Killiecrankie, as well as in a wide range of projects to help the business community maximise the opportunities presented by the quality of the natural environment.

In addition to past investment in the area, both Royal Deeside and Highland Perthshire continue to be amongst the tourism destinations on which SE focuses its ongoing tourism development effort. These are also areas which offer opportunities for closer working between SE and the Park Authority around Rural Development.

Against this backdrop of an established relationship between SE and the Park Authority, and recognising SE's wider tourism priorities, we would make the following comments on the draft plan:

The response has used the framework of the questionnaire provided as its basis, focussing on those questions which fit most readily with SE's role and priorities.

General

- The introduction and context setting which outlines the aims and importance of the National Parks, the National Park principles and the importance of partnership and is important and comprehensive;
- The draft Plan overall is comprehensive and CNPA should be congratulated for covering the wide variety of issues so thoroughly;
- However, this strength is also a relative weakness in that in such a long and complex document, it can be difficult to really understand what the key priorities are for the 2012-17 period. Currently, the structure reads: Vision / Strategic objectives / Twenty three long-term outcomes / Ten five-year plan outcomes / Policy directions / Action plan (work packages, delivery organisations);
- A suggestion is that it might be clearer to simply drop the twenty three long-term outcomes altogether and focus on the ten five-year plan outcomes as the Plan priorities (within the context of the 23 long-term outcomes highlighted in the 2007 Park Plan);
- Targets and indicators really help drive behaviour but there are perhaps too many. Could a subset of indicators and targets be identified (no more than say 10) that relate directly to the Plan priorities and which will genuinely drive organisations' actions and decision making?
- The clarity of the Draft Plan would improve if a distinction was made between tourism and economic development. Whilst tourism is clearly the most important sector of the economy, it is worth making a distinction in order to put more emphasis on the opportunities in other sectors and the need for diversification;

- Whilst the Park area is a coherent whole in landscape and ecological terms, in economic terms it is difficult to regard it as a single entity. In reality there is comparatively little interaction across the Park as a whole and it would be worth considering reference to the broader economic context;
- An example of this would be that in the SE area, the towns of Pitlochry, Blairgowrie, Kirriemuir and Aboyne are all outwith the Park but are significant to the economy of the Park as a source of services, facilities and visitor bedspaces.

Question 1

There is an opportunity to emphasise the wider role of national parks in the overall promotion and international positioning of Scotland. Additionally, the parks have a potential role to play in providing an opportunity for innovation around rural development, in acting as a basis for the growth of Scottish tourism and as being good examples of collaboration which can help deliver growth.

Question 2

The role of the Park as a place to work, do business and create wealth could be stronger.

Question 4

Long term outcomes could take more obvious account of the challenges outlined within page 17 and the opportunities to build on what has been achieved to date.

The outcomes also could be more explicitly related to demonstration of success, e.g. world class visitor destination, clarity on who the future visitor is, economic contribution. There is also potential for greater reference to market intelligence, technology, investment, ways of working around collaboration and industry leadership.

There could also be more explicit recognition of the different areas within the Park (and adjacent to the Park), their respective challenges, their tourism visitor strengths and relative offering and likely target markets and contributions.

Question 5

There is an opportunity for the Park to demonstrate more explicitly its contribution at a national level to other Scottish Government priorities which are major drivers of partners' activities and resource allocation, e.g. within Government Economic Strategy and the priority of "Sustainable Tourism".

There is also an opportunity for the outcomes to be more specific, e.g. "number 6 - the economy": *Which* sectors within the Park economy are most likely to provide the basis for growth and diversification?

There is the potential for the outcomes to be sharper. In addition, if public sector funding will be tight in the medium term, more effort may be required to enable private, voluntary and community groups to take lead in some areas.

Question 12

12 – A

We believe that there is perhaps too much in this particular outcome to be cohesive and it could perhaps be split out into two or three separate outcomes – perhaps tourism, economic growth and infrastructure development.

12- B

There would be benefit in more detail being provided around the nature, delivery, timescales, costs and benefits of the work packages. For example, high speed broadband and transport connectivity represent potentially significant physical development investments.

In addition to the current proposed actions, suggest adding an additional work package on 'reducing the barriers to private sector investment', which would be supported by financial institutions/banks and the Enterprise Agencies.

12 – D

Under package 2, SE will engage with businesses in the Royal Deeside and Highland Perthshire destination areas and help them to realise their growth potential.

12 - E

The targets are very ambitious in a period of prolonged economic recovery.

GVA is a discrete measure which is unrelated to inflation.

Net employment growth would perhaps be a better indicator than simple job creation.

12 – F

The following are available for the Royal Deeside DMO area:

- Average expenditure per person per day
- Total expenditure by staying visitors
- Associated GVA (staying visitors)
- Total number of commercial bed spaces
- Number of VFR days
- Number of staying visitors (ex VFR)
- Total number of visitor days
- Length of stay
- Associated direct employment

The Highland Perthshire DMO has been running a visitor survey since April, and a final report will be available in January, including a summary of responses gathered at points within the CNP boundary.

Question 13

13 – B

We have concerns around how the potential additional cost of 'Quality in Design' would fit with affordable housing and would appreciate more clarity on how this will be achieved.

13 – D

SE can provide access to its Rural Property Support Scheme and also to the Rural Petrol Station Grant Scheme.

13 – E

We would suggest that this also includes the value of projects as well as the number to give a more meaningful measure. In addition, an employment land and/or property take-up measure would be informative.

13 – F

We suggest that bodies such as the Carbon Trust could offer appropriate measures on sustainable and environmentally considerate building activity.

Question 14**14 - B**

We would suggest adding 'innovation' under work package 1. The delivery agencies for this work package should also include the Single Energy and Resource Efficiency Service (SERES - to be launched later this year); Adaptation Scotland; and the Enterprise Networks.

14 – D

We would suggest adding Transport Scotland as a delivery agency under work package 2?

14 – E

We would question whether there is a baseline for the energy performance of the existing building stock within the Park. If not, we would suggest this needs to be baselined before a reduction target can be set.

Question 16

There should perhaps be a more explicit recognition of the role of the Park's recreation opportunities in attracting visitors to the area. This could be better reflected in shaping the packages of work to deliver this outcome where the specific wants and contribution of the visitors to the Park should be considered. Different visitor groups will have different expectations and requirements and this will be important to reflect within any prioritisation of actions and resource allocation.

Our ref: PCS/116098

Your ref: Draft Park Plan

If telephoning ask for:
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8 December 2011

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Draft Cairngorms National Park Plan 2012 - 2017

Thanks you for your consultation letter dated 14 September 2011 regarding the Draft Cairngorms National Park Plan. We welcome the opportunity to engage in the Plan preparation process. On the whole we consider the Draft Plan to be of a high standard, setting a clear vision for the management of the Park which makes strong links between economic, social and environmental issues.

We have already met informally over the summer and at that time we touched on a number of the issues which we have now raised in this letter. The attached Appendix contains our comments on the Draft Plan, to assist you we have framed our comments around the topics and questions set out in the Draft Plan.

Please note, although we make reference to the associated Environmental Report (ER) for the Draft National Park Plan the detailed comments we have on the ER are provided separately (SEPA Reference: PCS/116125).

We trust the comments here are useful, please do not hesitate to contact me should you have any queries on any aspect of our comments or should we be able to assist you further with the development of the Plan through the provision of data or in the development of targets or indicators. Please contact me by telephone on 01224 266698 or by e-mail to planning.aberdeen@sepa.org.uk

Yours Sincerely

Nicola Abrams
Senior Planning Officer
Planning Service

Copy by Email to: Campbell Gemmell (Chief Executive) SEPA; Andy Rosie, Head of Operations (North), SEPA, Anne Anderson – Area Manager (North Grampian & West Highland), SEPA.



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Respondent Information Form

Reference number PCSN/16096 Date 9 December 2011

Consultation on the Draft Cairngorms National Park Plan 2012-2017
Monday 19 September – Friday 9 December 2011

Please note – if you respond in writing or by email, you must complete this form to ensure that we handle your response appropriately.

- This form can be photocopied or further copies obtained from the CNPA offices, or downloaded from www.cairngorms.co.uk
- Your comments and Respondent form must be received by **5pm on Friday 9 December 2011**

Title Mr Mrs Miss Ms Dr Other
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An acknowledgment will be sent to the address specified for the width of the consultation period. Are you happy to receive future correspondence by email? Yes No

am responding as an individual (please tick)

a. Do you agree to your response being made available to the public (via publications and our website)?
Yes No

b. Where confidentiality is not requested, we will make your responses available to the public on the following basis. Please tick **ONE** of the following boxes:

- Yes, make my response, name and address available
Yes, make my response available, but not my name and address
Yes, make my response and name available, but not my address

I am responding as a group/organisation (please tick)

c. The name and address of your organisation will be made available to the public (in publications and/or on our website). Are you content for your response to be made available? Yes No

Data protection: Details will only be used for purposes associated with this consultation. The information will be shared on a confidential basis with the consultants who have been appointed by the CNPA to analyse the comments. You may request to see personal information held by the CNPA at any time.

CNPA USE Nicola Adams Date 9 December 2011

Please return completed forms by **5pm, Friday 9 December 2011**, to:
Cairngorms National Park Authority, Freepost, NA 21454, Cairngorm-on-Spyy PH476 3BH
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Appendix 1: SEPA Response to Draft Cairngorms National Park Plan 2012 - 2017

1. Chapter 3 – Vision and Strategic Objectives

1.1 Q4 – Do you think the Long-term outcomes should be updated and condensed? If so how?

- 1.1.1 At the time of writing the outcomes for the previous Park Plan were appropriate, however they would benefit from updating to reflect the progression of key issues such as River Basin Planning, Climate Change, the publication of Scotland's Zero Waste Plan and the Flood Risk Management (Scotland) Act 2009 which place duties on Local Authorities to help deliver relevant objectives.
- 1.1.2 The Cairngorms National Park falls within the boundaries of the North East, North Highland, Argyll and Tay area advisory groups for river basin management planning. With regard to indicators, targets and data, we would recommend that links are made to the River Basin Management Plan (RBMP) for the Scotland river basin district (available at http://www.sepa.org.uk/water/river_basin_planning.aspx) and the interactive map of water bodies, as well as the supporting area management plans for the area advisory groups listed above. Although they are listed under special landscape qualities for the park, we highlight the socio-economic and environmental value of key rivers and lochs in the area, and the links to protected areas and the important role that the water environment has to play in the delivery of number key functions for the Park. We note that the water environment could contribute to the sense of *a special place, a sustainable economy* and the *Visitor experience of the Park*. We welcome in the previous long term outcomes the recognition of the role that Catchment Management Plans have played in delivery and request that this is retained. In any updating of the long-term outcomes, we would welcome an enhanced reference to the importance of the water environment and an aim of protecting and improving it to good ecological status to support the objectives of Scotland's River Basin Plan and the relevant Area Management Plans.
- 1.1.3 Scotland's Zero Waste Plan contains targets and objectives for the sustainable management of waste, including the target to recycle 70% of all waste and a maximum of 5% of all waste being sent to landfill. All developments plans have a role to play in ensuring that these targets can be achieved by 2025 and it is therefore recommended that the Cairngorms National Park Plan 2012-2017 should refer to the Zero Waste Plan targets and include a programme of work towards achieving them within the life of the Plan. Whilst it is acknowledged that planning for waste remains within the control of the development plans and consideration of planning applications, there would be real benefit in retaining within the Cairngorms National Park Plan a positive aspiration to minimise waste generated and increase recycling rates. We support the inclusion of a specific long term outcome in the previous plan relating to waste (Outcome no 15) we recommend that this outcome be carried forward in order to work towards the Zero Waste Plan 2025 objectives.
- 1.1.5 We recommend that consideration be given to the inclusion of an outcome explicitly relating to the need to contribute to a reduction greenhouses gases and resilience to climate change, perhaps this could be incorporated into existing Outcome No 15.

2. Chapter 4 - What should our Focus be for 2012 -2017?

2.1 Q5 – Do you agree this set of (Five Year) Outcomes?

2.1.1 Insofar as they relate to our interests we support the set of five year outcomes.

2.2 **Q6 – Which are the most important outcomes to you?**

2.2.1 Linking to the comments made in 1.1.2 above we support the inclusion of Outcomes 2 and 3 in particular as we consider protection and enhancement of the ecological status of the water environment as part of these outcomes relating to habitats and species.

2.2.2 In addition Outcome 8 is important to us because of links to mitigation and resilience to climate change including the protection of peatlands, sustainable waste management, flood avoidance and resilience to impacts of flooding.

Detailed Comments on Specific Outcomes

2.3 **Q8 – Outcome 2**

2.3.1 A: In general **we agree** that this outcome is an appropriate one for the National Park Plan, insofar as it relates to our interests. We welcome the recognition of wetlands, flooding and climate change issues under this outcome. However, we would also like to see recognition of the need to achieve good ecological status for surface waters (as required by the Water Framework Directive) clearly stated. This would ensure habitat quality and connectivity through rivers, lochs and surrounding habitats.

In addition **we welcome** the consideration of flooding but note this is generally through the increase of wetlands and natural flood management. The recent consultation document (The Flood Risk Management (Scotland) Act – Delivering Sustainable Flood Risk, January 2011) highlights the general duties of responsible authorities to; exercise functions to reduce overall flood risk, act in a way best calculated to manage flood risk in a sustainable way and promote sustainable flood management (with particular regard to how this may support an overall catchment management approach). One of SEPA's new duties within the Flood Risk Management (Scotland) Act 2009 is to assess whether alteration or restoration of natural features and characteristics of river basins or coastal areas could contribute to the management of flood risk. Natural features and characteristics include those which can assist in the retention of flood water such as floodplain, woodlands and wetlands. The safeguard of such features from inappropriate development or incompatible land uses within the Plan would assist with a sustainable approach to flood management. Therefore we highlight that there are other significant flood risk approaches which the CNPA could consider such as, avoidance of development in areas at risk of flooding, which may be more appropriate here.

2.3.2 B-G: We consider that there may be scope to further improve the package of work identified to deliver this outcome in terms of targets and indicators. With regard to indicators, targets and data, we would recommend that links are made to the River Basin Management Plan for the Scotland river basin district (available at http://www.sepa.org.uk/water/river_basin_planning.aspx) and the interactive map of water bodies, as well as the supporting area management plans for the area advisory groups listed above. If needed, we may be able to prepare a specific report on the current ecological status and targets for water bodies in the Cairngorms National Park area. In addition we would also refer you to the environmental objectives and indicators identified in the Strategic Environmental Assessment Environmental Report.

However, we advise caution over setting an indicator/target for Outcome 2 (page 32) of

increasing in area of active floodplain by 5% over 5 years. It is unclear how achievable this target is considering that increasing the floodplain may include the removal of informal agricultural flood embankments. There may need to be significant further research to assess the impacts of removal of, for example embankments, to show that there is no increased risk of flooding elsewhere. A more appropriate target may be framed around avoidance of development within the functional floodplain with a package of work to deliver a Strategic Flood Risk Assessment (SFRA)* for the National Park which could then provide information on constraints relating to development and land management within the Park. Please also refer to our comments made on the Strategic Environmental Assessment Environmental Report (under SEPA Reference: PCS/116125) which may also assist with regard to potential indicators. For your information a SFRA is designed for the purposes of specifically informing the development planning process. It involves the collection, analysis and presentation of all existing and readily available flood risk information for an area. The aim is to produce a strategic overview of flood risk which could then be used as a basis to support Local Authorities allocating local development plan sites or in this case to inform and support land use strategies. A SFRA could inform the National Park Plan, the Local Development Plan and indeed many of the other future plans and strategies for the Park.

2.4 **Q9 - Outcome 3**

2.4.1 A: In general **we agree** that this outcome is an appropriate one for the National Park Plan, insofar as it relates to our interests. We support the recognition of invasive species issues under this outcome. However, **we request** the recognition of the need to achieve good ecological status for waterbodies (as required by the Water Framework Directive) be clearly stated. This would ensure habitat quality and connectivity through rivers, lochs, wetlands and surrounding habitat.

2.4.2 B-G: With regard to indicators, targets and data, we would recommend that links are made to the River Basin Management Plan for the Scotland river basin district (available at http://www.sepa.org.uk/water/river_basin_planning.aspx) and the interactive map of water bodies, as well as the supporting area management plans for the area advisory groups listed above. If needed, we may be able to prepare a specific report on the current ecological status and targets for water bodies in the Cairngorms National Park area. Please also refer to our comments made on the Strategic Environmental Assessment Environmental Report (under SEPA Reference: PCS/116125) which may also assist with regard to potential indicators.

2.5 **Q14 – Outcome 8**

2.5.1 A: In general **we agree** that this outcome is an appropriate one for the National Park Plan, insofar as it relates to our interests. We welcome the clear reference to waste reduction and improvements in waste management schemes within the outcome however there is no clear corresponding “package of work” which could deliver this.

2.5.2 B-G: **We recommend** that a package(s) of work be identified that deliver the waste reduction and improvements in waste management schemes identified within this outcome, perhaps through reference to the Waste Management Strategies of the contingent Local Authorities.

In addition we support the recognition of the role of land and land use management to minimise carbon loss and the identification of a package of worked linked to this. If you are not already aware of it, SEPA has produced a position statement relating to developments

on peat which may assist with this package of work (http://www.sepa.org.uk/planning/sustainable_waste_management/surplus_peat_management.aspx), additionally we have recently published a position statement on Soils (<http://www.sepa.org.uk/planning.aspx>) which may also be of interest to you.

3. Chapter 5 – Managing Competing Demands on the Landuse Strategy

3.1 Q 17 – Do you agree with the Key Principle?

3.1.1 **We welcome** the recognition of the challenge of managing competing demands and we support the promotion of delivery of multiple benefits through land use. This links well with our broad objectives particularly with regard to achieving good water, air and land quality and protecting, informing and engaging communities.

3.2 Q19 – Do you agree with the Opportunities and Threats identified, if not why?

3.2.1 We consider the threats and opportunities section considered by various habitat types is a useful way of considering the issues affecting the National Park, overall it is comprehensive and recognises the key threats and opportunities, we make the following comments in the interests of further improving the document.

3.2.2 Under the *Farmlands* category **we suggest** consideration is also given to opportunities for farmland to also contribute to improvements to ecological status through reductions in diffuse pollution through land management practices.

3.2.3 **We are pleased to note** that the analysis for *rivers, lochs, wetlands and floodplains* recognises key pressures listed in the River Basin Management Plan for Scotland.

3.2.3 **We support** the recognition under the *mountains, moor and heathland* category of the role of peat and moorlands as significant carbon stores and the need to protect this function.

3.2.4 With regard to the section on *towns and villages* we welcome the recognition of green network opportunities and SUDS, and consider that these opportunities can contribute to improvements to the status of the water environment, as well as bring a range of multiple benefits.

3.3 Q20 – What are the particular opportunities and threats that the plan should address between 2012 and 2017?

3.3.1 Many issues identified by us in 3.2 above are of key importance and require immediate action in order to deliver the desired outcomes and therefore should be tackled in the 2012 to 2017 period.

3.4 Eight Policy Directions

3.4.1 **Q21- Policy Direction 1. We support** this policy direction insofar as it relates to our interests. With regard to the policy approach on habitat connectivity, RBMP data can offer mapped information on the quality of water habitat networks, as well as identifying areas where improvements are needed.

3.4.2 **Q22 – Policy Direction 2. We support** this policy direction. With regard to monitoring and reporting systems for key habitats beyond designated sites, RBMP data can offer mapped information on the quality of water habitat networks, as well as identifying areas where

improvements are needed.

3.4.3 **Q23 – Policy Direction 3. We support** the promotion of natural flood management in this policy approach. Natural features and characteristics include those which can assist in the retention of flood water such as floodplain, woodlands and wetlands. The safeguard of such features from inappropriate development within the Plan would assist with contribution to a sustainable approach to flood management.

3.4.4 **Q24 – Policy Direction 4. We welcome** the references to habitat networks, floodplain functionality and erosion control. RBMP data can offer mapped information on the quality of water habitat networks, as well as identifying areas where improvements are needed.

We also welcome the promotion of protection of the floodplain. Natural features and characteristics include those which can assist in the retention of flood water such as floodplain, woodlands and wetlands. The safeguard of such features from inappropriate development within the Plan would assist with contribution to this duty and a sustainable approach to flood management. However we highlight that there are other significant flood risk policies which the Planning Authority could be considering, such as avoidance of development in areas at risk and **we request** that consideration be given to their inclusion. Data being prepared by SEPA as part of flood risk management work will also be helpful in developing this approach.

3.4.4 Q27 – Policy Direction 7. **We welcome** the emphasis on Catchment Management approaches in this section.

3.4.5 Q28 – Policy Direction 8. **We recommend** that Policy Direction 8 is amended to include reference to the sustainable management of waste and the development of infrastructure which will enable the population of the National Park to increase recycling and reduce waste generation, through links to the relevant Local Authorities Waste Strategies.

A SFRA does not however eliminate the requirement of a more detailed flood risk assessment which includes both hydrological and hydraulic modelling in support of an allocation or planning application. It may take the form of a desk study but where possible more detailed analysis could be included if it is available. Examples could be information from a strategic hydraulic modelling exercises or specific hydraulic modelling to support flood prevention schemes. Whilst not a detailed assessment of flooding the SFRA may contain a summary of flooding incidences or problems areas where there have been significant or frequent flood events. A SFRA may include the identification of sources of information which are available for review at a more detailed stage.

A SFRA or Plan may include some guidance or policies on flooding which may support decisions on specific development areas. Important approaches to flood risk issues could include:

- All sources of flooding will be considered, fluvial, coastal, pluvial, sewer and groundwater.
- The identification that development will be free from a significant risk of flooding and not increase the risk of flooding elsewhere.
- The flood storage and flood capacity of functional floodplains (defined as the 1:200 flood within the Scottish Planning Policy) will be safeguarded.
- The support of the risk based approach to development as contained with Scottish Planning Policy (SPP). This includes the avoidance of new development in undeveloped/sparsely developed (Greenfield) functional floodplain and appropriate development of Brownfield areas (noting that

residential development may not always be suitable).

- Identification of existing or planned Flood Prevention schemes and acceptable development which could occur in these areas.
- Essential civil infrastructure such as hospitals, fire stations etc and sensitive developments such as nursing homes, sheltered housing, schools etc would need additional consideration in terms of flood risk (1:1000). Where possible relocating such infrastructure at risk if major refurbishment or redevelopment is planned.
- An indication of any allowance for climate change when considering the risk of flooding. Noting that climatic change has the potential to increase the risk of fluvial and pluvial flooding and not just coastal sea level rise.
- An indication circumstances where a freeboard allowance should apply.

Consultation Title: Draft Cairngorms National Park Plan 2012-2017

Date: 9 December 2011

To: parkplan@cairngorms.co.uk

From: Scottish Land & Estates

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Scottish Land & Estates is a member organisation that uniquely represents the interests of both land managers and land based businesses across rural Scotland. Scottish Land & Estates has over 2,500 members, a number of whom live and work within the Cairngorms National Park. Our members operate across a multitude of land uses and therefore the future success of the National Park and the provisions contained within the Park Plan are going to have fundamental impact on the operation and forward planning carried out by our members.

As part of the consultation process Scottish Land & Estates, along with the Cairngorms National Park Authority, held a successful land managers event in November 2011. Many of the issues discussed and concerns raised during the meeting form part of the Scottish Land & Estates response.

General comments:

Role of Park Plan within the planning system - As the diagram on page 12 of the draft Plan shows, the Park Plan sits above all other planning mechanisms across the National Park as a material consideration. It is therefore essential the Local Development Plan allows for suitable development to take place in order to help achieve the outcomes identified within the draft Plan. Scottish Land & Estates welcomes the opportunity to respond to the Main Issues Report at the same time at the draft Park Plan.

Cross sector collaboration between the public and private sector is essential in order to develop a coherent programme for delivery of the objectives contained within the draft Park Plan.

Concern has been raised by members that the draft Plan does not full address "delivery". Buy-in from the private sector is of vital importance if the Park Plan is to deliver on its outcomes. Therefore mechanisms for delivery must be addressed in the first instance - especially considering the huge financial pressure faced by the public sector – as there are undoubtedly going to be areas of the Park Plan in which the delivery will be largely fuelled by private organisations who operate within the National Park.

Members have also highlighted to Scottish Land & Estates that they feel they do not have any sense of ownership of the National Park. There is a belief that this has in the past compromised the progress of the National Park and this must be addressed in going forward.

There is concern that the term "wildness" is not defined in the document. We believe the Park Authority will be drawing from the Wildness Study carried out by Leeds University. For those who are not aware of this study however, there is no clear indication in the Park Plan as what Park Authority means by the term "wildness". It is important that this is made clear since it would be misleading if readers were to assume that wildness areas are environments which are truly wild, unmanaged landscapes.

Question 6: Which are the most important outcomes to you?

Scottish Land & Estates believe the most important outcomes are 3, 5, 6 and 7.

Comments on Five year Outcomes:

Outcome 1

Scottish Land & Estates agrees that people visiting the National Park should have a greater understanding of the National Park and this in turn will add to the enjoyment of their visit. Improvement of interpretation of culture, history, economy and environment would contribute to the achieving this outcome.

Outcome 3

Scottish Land & Estates is supportive of the aims of this outcome and agree with its requirements. We will continue to work closely with our members and partnership organisations to help achieve the desired outcome.

A number of our members within the National Park are participating in the pilot stage of the Wildlife Estates Scotland Initiative and we will continue to support them.

Outcome 4

We have already made comment regarding the definition of "wildness".

There is also a concern that if the Authority is striving to attract more visitors to the Cairngorms National Park, particularly if that is to appreciate its wildness qualities, that this will in fact have a negative impact on the "wildness" of the National Park.

Outcome 5

Scottish Land & Estates supports this outcome. Developing rural skills and knowledge is essential in sustaining both the local rural economy and communities. It is also important to give land managers the ability to influence the research strategy for the National Park and lead on some of this activity. This outcome also allows for joint working between the Park Authority and the private sector.

Outcome 6

Scottish Land & Estates would like to see greater emphasis placed on traditional land uses such as farming, forestry, and sporting activities as a mechanism for growing the local economy. For example many of our members have highlighted the huge primary and secondary benefits they see in developing fishing within the National Park.

We also believe that diversification is going to be essential in delivering a successful National Park. There is a belief that the National Park has become too reliant on tourism to drive the economy. Other enterprise opportunities should be encouraged, particularly in areas where we have a geographic, environmental or social advantage.

Outcome 7

Scottish Land & Estates is supportive of this outcome and believes that by retaining traditional industries and skills then sense of place can be maintained.

We strongly agree that settlements within the National Park must function well. This will be dependant on the Local Development Plan being flexible, particularly in relation to development of housing. Housing must be targeted to meeting the need of those people who live and work within the

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traditional skills within the rural sector of they can not afford to live where they work. We are encouraged that the Park Authority recognise the role played by smaller communities.

We are also supportive of the need to develop community and connectivity across the National Park to aid growth.

Scottish Native Woods

Q1 What makes the National Park Special to you?

Q2 Do you agree with these descriptions of the special qualities?

The description in the draft is good.

In theme 2, we strongly support the focus recognition of the mosaic of habitats that are found in the Park

We particularly appreciate the cultural theme, and the reference to "Forest folk". A forest culture is possible within the Park.

Q3 Are there other special qualities you think should be explicitly identified in the National Park Plan?

The woodland focus is on pine and birch at a landscape scale. This should be broadened to include other woodland types, such as riparian woodlands and aspen rich woodlands.

Q4 Do you think the long-term outcomes should be updated and condensed? If so, how?

Q5 Do you agree this set of outcomes provides the right focus for the next five years? If not, what else is more important?

Q6 Which are the most important outcomes to you?

2 Quality and connectivity of habitats will have improved, enhancing the landscape at a Park scale

3 Species for which the Park is most important will be in better conservation status in the Park.

5 There will be a better targeted programme of advice and support for land managers that delivers the NP Plan.

Q7

A Do you agree that the five year outcome 1 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

Scottish Native Woods have some experience of working with Highland Aspen Group in the Park to involve volunteers in conservation activities. We hope to

develop this aspect of our work, and also to extend it to include volunteering on PAWS sites.

E Do you agree with the indicators and targets suggested for this outcome?

The targets selected are ambitious.

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q8

A Do you agree that the five year outcome 2 is an appropriate one for this NP Plan?

The heading, "the quality and connectivity of habitats will be improved, enhancing the landscape at a Park scale" is good. However the high level text that follows this focuses on expansion and connectivity. We suggest that text should be included on the importance and benefits of securing sustainable management of existing habitats, especially High Nature Value woodlands.

B Do you agree that the packages of work identified for this five year outcome would deliver it?

Increased natural flood management can also be delivered by appropriate riparian woodland management and creation.

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

We have been in discussion with CNPA and the Woodland Trust about a PAWS restoration project within the Park. This has the potential to enhance the condition of native woodland sites, and to influence the management of other native woodlands.

E Do you agree with the indicators and targets suggested for this outcome?

Something that indicates that more existing habitats are being brought into appropriate management should be included.

F Can you tell us about better indicators or more appropriate targets?

The PAWS project will have targets for native woodland sites brought into management.

G Can you provide data for better indicators?

Yes, but not immediately!

Q9

A Do you agree that the five year outcome 3 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

We have the skills necessary to contribute to "targeted and proactive advice and support for land managers to deliver conservation"

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q10

A Do you agree that the five year outcome 4 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q11

A Do you agree that the five year outcome 5 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q12

A Do you agree that the five year outcome 6 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q13

A Do you agree that the five year outcome 7 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q14

A Do you agree that the five year outcome 8 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q15

A Do you agree that the five year outcome 9 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q16

A Do you agree that the five year outcome 10 is an appropriate one for this NP Plan?

B Do you agree that the packages of work identified for this five year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome

D What can your organisation do to deliver the outcome? Eg provide leadership, co ordination, provide skills and advice, provide money

E Do you agree with the indicators and targets suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Q17 Do you agree with the key principle?

Q18 If not, why?

Q19 Do you agree with the opportunities and threats identified. If not why?

The reduced profitability of commercial forestry replanted with native species is identified as a threat. Is this a threat, given that much of the commercial forestry in the Park already consists of native species, or is it a mindset?

Q20 What are the particular opportunities and threats you think the Plan should address between 2012-2117?

The proposed Woodland Trust/Scottish Native Woods project will provide a good way of addressing sustainable management of PAWS in the Park. Scottish Native Woods are also interested in the potential for landscape scale restoration in the Park, and look forward to discussing this with CNPA during the development of the finalised Plan.

Q21

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q22

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q23

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q24

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q25

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q26

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q27

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Q28

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Annex 1: Response to Cairngorms National Park Plan 2012-2017 consultation questions from Scottish Natural Heritage

SECTION 2 The Cairngorms National Park (pages 13-15)

Question 1: What makes the National Park Special to you?

- The rocks and landforms provide an exceptional record of the processes of landscape evolution, with a remarkable diversity of features in a relatively compact area.
- The large expanses of native near-natural habitat, particularly forest and montane.
- The large extent of high altitude terrain with an outstanding range and diversity of landforms, arctic-alpine wildlife & habitats.
- The overall mixture and close proximity of so many features of natural heritage importance.
- The way the large and distinctive wild land core, together with the climate and topography of the plateau, create a large area of unique recreational opportunity and challenge, particularly in winter conditions.
- The concentration of National Nature Reserves offering opportunities for people to visit and learn about this outstanding natural heritage.

Question 2: Do you agree with these descriptions of the special qualities?

Yes, we agree with the qualities as described in the 4 key themes and table 2.1.

Question 3: Are there other special qualities you think should be explicitly identified in the National Park Plan?

It would be useful to articulate the Park's recreational special qualities more clearly in the text on p13-14. For example you could refer to the Park containing the premier location in the UK for winter mountaineering skills training & ski mountaineering / touring; the unique high altitude plateaux with broad expansive scale views; and the wide range of recreational opportunities in close proximity to each other.

SECTION 3 Vision and Strategic Objectives (pages 16-22)

Question 4: Do you think the long-term outcomes should be updated and condensed? If so, how?

We recommend updating them to better address recent national priorities such as mitigating and adapting to climate change; delivering an ecosystems approach; natural approaches to flood management; using green spaces including paths to deliver health, wellbeing, and attractive places to live, visit & do business; protecting peat and carbon rich soils.

There is scope to combine outcomes 4, 7, 8, 21, 22 & 23 into one or two outcomes concerned with raising awareness and understanding of the special qualities, and addressing knowledge gaps.

The environmental objectives you have identified in Tables 8 & 9 of the SEA Environmental Report might be a useful basis for developing a new, smaller and more up-to-date list of long term objectives.

SECTION 4 What should our focus be for 2012-2017 (pages 23-56)

Question 5: Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

Yes – this set of outcomes broadly captures our key priorities. We do, however, recommend including a greater emphasis on climate change adaptation, particularly work to enhance the resilience of habitats, species and land use to climate change. This could be incorporated into outcome 2 or 8. It is covered by policy direction 4 in the land use strategy but we feel it is a key area for action in the next 5 years so should be more up front in the outcomes. We are currently preparing our new Climate Change Action Plan which includes adaptation guidelines. We will send the current draft to you separately as it contains material that could be useful as you prepare the final Plan.

A further key environmental objective identified in your SEA for the Park Plan is the need to minimise unnecessary use of water. This isn't explicitly covered by any of the outcomes at present, but we suggest it does require extra effort over the plan period. You may be able to incorporate it into outcome 8.

As you work up the action programmes needed to deliver these outcomes, and as we progress through the plan period, it will be worth keeping their deliverability under review, particularly in the light of the reduced amounts of public sector staff time and funding that are likely to be available.

Question 6: Which are the most important outcomes to you?

All the outcomes are relevant to our work, but particularly 1-5, 7, 10.

Question 7: Outcome 1 - More people will learn about, enjoy and help to conserve and enhance the special natural and cultural qualities of the Park p26

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Yes

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

They will help but they are unlikely to be sufficient. There would also need to be

- further effort at developing, promoting and monitoring responsible recreational behaviour and increasing understanding of what that means for different activities in the main types of recreational settings in the Park;
- encouraging promotional and marketing material targeted at visitors, including that produced by individual businesses, to include reference to relevant special qualities and relevant behaviours that would help customers enjoy, conserve and enhance them;
- interpretative / educational material targeted at residents to help them gain more enjoyment from living in the Park, and so that they can better help to deliver this outcome in their interactions with visitors;

We welcome the proposed work package to update and deliver the CRAGG strategy.

C Are there any better packages of work that would deliver the outcome?

See above. In addition we have some advice that may be useful as you develop the packages:

- Package 3. We recommend that those offering volunteering opportunities use the Volunteer Scotland website <http://www.volunteerscotland.org.uk> which is developing into

a one stop shop for volunteer opportunities in Scotland. We also recommend that those offering opportunities consider attending training for Volunteer Managers offered by Volunteer Development Scotland and link in to the Forum for Environmental Volunteering Activity (FEVA) environmental volunteer managers project.

- Package 4. We recommend this is expanded to also cover the natural heritage, including geodiversity, to become a programme for integrated interpretation of the special qualities.
- Package 6. We recommend the approach we have been piloting with our 'Teaching in nature' project' (see <http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=1839>), which we hope to roll out in 2012/13 and beyond. This involves encouraging groups of teachers to work together to plan outdoor visits to a particular site and then evaluate and develop the visits together, as CPD. In the long run this could become a 'Growing up with...' project, involving a secondary school and all its cluster schools (see <http://www.snh.gov.uk/about-scotlands-nature/resources-for-teaching/sgp/loch-leven-nnr-case-study/> for an introduction).
- We recommend you consider adding a work package about developing ways of making it easy for visitors and businesses to donate funds to help conserve and enhance the special qualities.
- We recommend adding Ranger Services as key delivery partners for several of these work packages.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We can advise on delivery of the Sustainable Tourism Strategy, and help to deliver it ourselves on the NNRs we manage.
- We can advise on the volunteering programme, and possibly provide funding support for elements that have a good fit with our funding priorities (click on 'funding priorities guidance' at the bottom of this page: <http://www.snh.gov.uk/funding/our-grants/what/our-funding-priorities/> to find details of our target groups and the outputs we are looking for). We can also help deliver it on NNRs we manage, and encourage other NNR managers, particularly those we fund, to do so too.
- We can advise on updating and delivering the CRAGG strategy.
- We can advise on outdoor learning aspects of Package 6, and we'd be interested in considering a partnership funding package to continue the National Parks outdoor learning officer post.
- We can advise on, and help deliver, the proposed action we suggest at B above on promoting responsible behaviour.

E Do you agree with the indicators and targets suggested for this outcome?

It would be helpful to include baseline figures for all the proposed indicators and targets in the final plan. The first indicator might be more useful if it distinguished between visits led by schools and visits led by others eg. John Muir Award, ranger services.

F Can you tell us about better indicators or more appropriate targets? & G Can you provide data for better indicators?

See our work on the environmental indicators framework which we will send separately.

<p>Question 8: Outcome 2 - The quality & connectivity of habitats will have improved, enhancing the landscape at a Park scale p30</p>
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A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Yes, although we think it should be expanded to cover improving habitat diversity. In our view, this is necessary to improve the resilience of habitats to climate change, which should be a key priority. You could even consider changing the outcome to 'improve the resilience of habitats to climate change'. This would include increasing habitat connectivity, condition, diversity and patch size, allowing space for natural processes, and looking after the underlying soils and geomorphology.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

- We would like to see the work we are leading on bringing designated sites into favourable condition identified as a work package to deliver this outcome. Despite the combined efforts of a number of public agencies and land managers, we still fell some way below the Government's target for 95% of features on designated sites being to be favourable condition by March 2011. This was the case in the Cairngorms, as well as nationally. A revised target for the future will be announced by Government shortly. We think that extra effort is now required to target resources and improve the efficacy of current arrangements for bringing features into favourable condition. You might like to consider a 5-year CNP target to exceed the national % of features in favourable condition. Other key delivery partners for this work package would include land managers, yourselves, FCS, SGRPID and SEPA.
- We think there should be more emphasis in this outcome on better management of blanket bog, peat and carbon rich soils to improve habitat condition; reduce carbon emissions from exposed peat; and improve carbon storage. Blanket bog erosion is a key issue contributing to unfavourable condition on several designated sites, and is likely to be a significant source of carbon emissions. This area of work is likely to involve trialling new techniques to promote revegetation and, in some areas, reducing grazing impacts.
- We recommend stating more explicitly that delivery of this outcome will require reducing herbivore impacts in some areas, given that high deer densities in particular are currently the single key constraint on achieving this outcome in many parts of the Park, for example in relation to native woodland. Simply referring to delivering the Cairngorms Deer Framework obscures this key point. SNH and FCS are trying to tackle this issue where it is resulting in unfavourable condition on designated sites, but other players and delivery mechanisms are needed to tackle it elsewhere in the Park.
- We welcome Package 1 and note that its design and deliverability will be crucial for achieving this outcome. Securing sufficiently attractive packages of advice, support and funding to assure delivery will be challenging. We look forward to working with you on this package.
- We note the 'sub-outcome' for *better understanding of ecosystems and the links between them*. If this is about research it won't be delivered by the work packages currently identified; if it is about improving public understanding it would be good to build this explicitly into delivery of packages 4 & 5, and some of the packages associated with Outcome 1.

C Are there any better packages of work that would deliver the outcome?

We have some advice to incorporate as you develop these packages:

Package 1:

- We recommend this package includes delivery of relevant initiatives such as the Upper Dee Riparian Woodland and Floodplain projects.
- Presumably this package would be delivered by some sort of programme offering advice, support and incentives. If so, Rural Priorities and its successor scheme are likely to be important funding sources and worthy of mention.

- Delivery of this package is likely to be challenging so it might make sense to focus on a small number of named high priority areas / projects.
- It would be useful if it is delivered in a way that links to habitat and greenspace networks outside the Park, explicitly helping to deliver the National Ecological Network.
- We recommend this package is developed in a way that takes into account the need to balance aims to increase in woodland with aspirations for enhanced views. Views within the Park, looking out from it, and looking in to it from outside are all relevant.
- It would be useful to clarify if work package 1 is about a place-based approach to delivering ecosystem services, ie. does it link to the first 'policy approach' listed under 'policy direction' 7 in the land use strategy?

Package 2:

Several of the Catchment Partnerships have identified a number of actions that remain to be implemented, including river and floodplain restoration works that would help to deliver this outcomes, so implementing actions already on the table could be more important than continuing development. It would be useful to identify which actions would be most useful for delivering this outcome.

Packages 4 & 5

It would be useful if these promote collaborative management and action across both estate and habitat boundaries.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We will work with land managers to promote management changes to bring features on designated sites into favourable condition. This will help to deliver this outcome. We are just starting a project to deliver a strategy and implementation plan to guide work by us and others to help deliver the Scottish Government's new favourable condition target.
- We are currently planning to identify potential sites to pilot approaches to peatland restoration, and we would be interested in discussing the potential for a site in the Cairngorms.
- We will work to improve habitat quality and connectivity on the NNRs that we manage, where this is compatible with the conservation objectives for the various designated features. We will also support and fund this management at Glen Tanar through our NNR agreement and Mar Lodge through our Management Agreement.
- We can advise on Package 1, including offering expert advice from our woodland and wetland advisors, and support delivery through our role in delivering the SRDP and influencing the nature of successor schemes.
- We can advise and support the Catchment Management Partnerships and provide advice on delivering the deer framework.
- We will continue to contribute to CDAG and to delivery of the Cairngorms Deer Framework.
- We can help in a small way to deliver the awareness raising package 5 in the course of our work promoting Rural Priorities to owners and occupiers of designated sites.

E Do you agree with the indicators and targets suggested for this outcome? & F Can you tell us about better indicators or more appropriate targets? & G Can you provide data for better indicators?

- We would be happy to work with you to apply existing methods of assessing woodland connectivity to the Park area. This would be a better indicator than simply assessing the increase in area of woodland. If you stick to the latter we recommend explaining whether it refers to any woodland or just native woodland (or productive woodland?), and what the % increase applies to (the area of existing woodland? The area covered by the Park?)

Additional suggestions:

- % of km length of rivers and area of water bodies achieving good ecological and chemical water quality.
- Number of landowners/area of land in Rural Development Contracts for woodland expansion/water margin management etc.
- Increase in area of active floodplain.
- The Scottish Biodiversity Forum ecosystem groups are developing ecosystem health targets and indicators which may be useful.

Question 9: Outcome 3 - The species for which the Cairngorms National Park is most important will be in better conservation status in the Park p33

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Yes

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

- They will help, but a further package of work would also be needed to develop innovative solutions for managing recreational behaviour, and promoting responsible behaviour, in sensitive sites. We think the CNP is an ideal location to trial and test new approaches because of the popularity of the Park for recreation, and the concentration of species sensitive to disturbance. This package should aim to deliver in a coordinated way across land management boundaries, and increase understanding of what responsible behaviour means for different activities in the main recreational settings in the Park.
- There will need to be a package of work in addition to the wildlife estates initiative, available to help land owners and managers who aren't participating wildlife estates to encourage and help them to deliver this outcome. In particular, sharing good practice events for estates could be useful, eg. on muirburn.

C Are there any better packages of work that would deliver the outcome?

- In reviewing the LBAP, it would be useful to identify priorities for action to support habitat and species adaption to climate change, reflecting their vulnerability and the likely effectiveness of any action.
- The landscape scale project identified under outcome 2 is likely to result in benefits for species too and could also be mentioned here, e.g. for capercaillie, which would benefit from woodland expansion and creating woodland networks between the designated sites.
- The Catchment Partnerships should also deliver species benefits.
- It will be important to set up the wildlife crime reduction partnership in a way that complements the initiatives currently underway covering areas that span the Park boundary.
- We recommend the package on invasive non-native species is designed to align with strategic approaches and the INNS code.
- Rural Priorities could help to deliver this outcome as it offers opportunities targeted at LBAP species and can also assist in controlling non-natives. It will be important to influence the design of successor schemes so they help to deliver this outcome.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We will manage our NNRs in ways that aim to improve the conservation status of key species.

- We can advise on the review and delivery of the LBAP, and possibly provide funds to support some areas of delivery, depending on fit with our funding priorities which will be determined by our forthcoming Wildlife Management Framework.
- We can encourage other organisations that we fund (eg RSPB, NTS, Glen Tanar Estate) to deliver this outcome.
- We can advise wildlife crime reduction partnerships, and provide financial support towards Grampian Police Wildlife Crime Education Officer, Tayside Countrywatch and Grampian Raptorwatch.
- We will advise on the wildlife estates initiative.
- We can advise on invasive non-native species programme, particularly where it relates to designated nature conservation sites. We may be able to support actions that will deliver the INNS code and our new Wildlife Management Framework.
- We can help in a small way to deliver the awareness raising package 6 in the course of our work promoting Rural Priorities to owners and occupiers of designated sites.
- We can advise on, and help to deliver, measures to promote responsible behaviour in relation to sensitive species, as recommended at B above.

E Do you agree with the indicators and targets suggested for this outcome?

We suggest that the target for uptake of the Wildlife Estates Initiative could be more ambitious, as we hope that the Park would lead uptake rates compared to what could be achieved nationally.

F Can you tell us about better indicators or more appropriate targets?

We have some suggestions for further targets:

- Increase in occupancy of golden eagle home ranges within the Park
- No birds of prey involved in the raptor track project found poisoned

G Can you provide data for better indicators?

No

Question 10: Outcome 4 - The qualities of wildness in the Park will be greater p36

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

We support the inclusion of an outcome concerned with wildness, although we are not convinced that an *increase* in wildness is deliverable or required. There is a notable mismatch between this objective to increase wildness, and the proposed packages of work which will mainly work to *maintain* the existing resource. Given that areas likely to be part of the landscape scale enhancement programme are already identified as having wildness qualities, the bulk of the increase needed would have to be in the straths and on the lower ground. This would seem to sit uncomfortably with some of the other policy directions in the Park Plan and Main Issues Report eg. for better communications and settlement growth. If you are confident that an increase is needed and deliverable, we recommend giving more detail about where / how that should be delivered.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

No, as stated above, there is not enough in the work packages to ensure that the ambitious outcome of a 10% increase can be delivered.

C Are there any better packages of work that would deliver the outcome?

- This target might be unobtainable without a package concerned with removing redundant or abandoned infrastructure. Funding this is likely to present challenges.

- Given the present rate at which hill tracks are being upgraded, extended and constructed in the Park, a greater emphasis is needed on better quality siting, design, construction and maintenance of hill tracks, eg via local development plan policies or SPG.
- More policy / guidance would be useful on the circumstances in which windfarms and other large scale development outside the Park can adversely affect it, possibly via some sort of strategic locational guidance for a buffer zone around the Park.
- We wonder how effective the 'Quality in design' package will be at successfully influencing the target audience which is presumably land managers & developers. Would this issue be tackled more effectively as SPG?
- The issue of deer fencing is relevant here – ambitions to increase woodland cover, in the absence of progress on reducing deer impacts will tend to lead to more fences. We appreciate that deer fences aren't incorporated into the Cairngorms wildness map, but a significant increase could act to diminish wildness qualities, at least for the duration that fences are required.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

Advise on strategic policy and guidance (CNPA lead on advising on the impacts of proposals on wildness, under the SNH/CNPA casework agreement).

E Do you agree with the indicators and targets suggested for this outcome?

The target is ambitious. Based on our own recent experience of the number of proposals for new hill tracks and fences etc, we expect that the area characterised as high or medium wildness is currently likely to be decreasing.

F Can you tell us about better indicators or more appropriate targets?

See above

G Can you provide data for better indicators?

No

Question 11: Outcome 5 - There will be a better targeted programme of advice and support for land managers in the Park that delivers the National Park Plan p39

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

We support the intent of this outcome, but given that it concerns a way of delivering other outcomes, rather than an end point in itself, it may not need to be identified separately. Instead, it could be a 'package of work' needed to deliver other outcomes eg 1, 2, 3, 4, 6, 8, 10, and the land use strategy.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

An additional package of work may be needed, focussed on improving communication of the wider public benefits of land management actions that will deliver the Park Plan (eg flood alleviation, carbon storage, salmon stocks), to all relevant stakeholders including local communities. This could be linked to work package 6 in outcome 3 and package 5 in outcome 2.

C Are there any better packages of work that would deliver the outcome?

See above

- We welcome package 1 which could be a useful pilot for a spatial expression of a local land use strategy.

- We recommend working with others to tease out just what is required to achieve better coordinated delivery of advice, in time to feed in to discussions about the design of the successor to SRDP.
- The Moorland Forum could have a role to play as a coordination mechanism for some aspects of delivery.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We can advise on the public benefit priorities of different parts of the Park and on reconciling competing objectives.
- We can support delivery through our role in delivering the SRDP.
- We can offer NNRs as potential locations for demonstrating management for nature conservation to others.

E Do you agree with the indicators and targets suggested for this outcome?

The first indicator & target may need to be modified during the plan period as arrangements for supporting land managers are likely to change after 2013.

F Can you tell us about better indicators or more appropriate targets? & G Can you provide data for better indicators?

No

<p>Question 12: Outcome 6 - The economy of the Park will have grown & diversified, drawing on Park's special qualities p42</p>

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

This outcome lies largely outwith our remit, but we welcome the clear link between economic growth and the special qualities. It would be helpful to state more explicitly in the introductory text that the special qualities provide a competitive advantage for many businesses, with some dependent on continued high quality nature watching and recreational opportunities, and our attractive landscape settings.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

We suggest considering whether more action is needed on the special qualities aspect of this outcome. For example packages to manage built development, greenspace and path networks to maintain the Park as an attractive location to live and do business; making it easy for businesses to help conserve & enhance the special qualities in ways that are specifically relevant to them.

C Are there any better packages of work that would deliver the outcome?

SRDP is available for business development and so this could be a useful source of funding for delivery.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We can advise on strategic policy and guidance, and on implementation of the Sustainable Tourism strategy.
- We can try to accommodate and support appropriate businesses to grow and diversify using the NNRs we manage (eg via local procurement; wildlife tourism operators).

E Do you agree with the indicators and targets suggested for this outcome?

A link to the special qualities would be welcome, although we have no more specific suggestions at this stage.

F Can you tell us about better indicators or more appropriate targets? & G Can you provide data for better indicators?

No

Question 13: Outcome 7 - settlements & build development will retain & enhance the distinct sense of place & identity within the landscapes of the Park p45

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Yes

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

We think more emphasis is needed on:

- Delivering the Government's place-making agenda, particularly in relation to providing high quality environments for people and nature that incorporate well managed and accessible greenspace, paths and landscapes, often via multifunctional green networks. These help to deliver a wide range of benefits. Our new policy on 'better places for people and nature' will be published on our website shortly, and contains useful background and examples to help develop the work packages. The final draft can be downloaded from this webpage: http://www.snh.gov.uk/about-snh/board-comm-and-mgt/board/board-meetings/document/?category_code=Board&topic_id=1533 .
- Using the landscape framework and sustainable design guide to inform new development
- We wonder how effective the 'Quality in design' package will be at successfully influencing the target audience which is presumably land managers & developers. Would this issue be tackled more effectively as SPG?

C Are there any better packages of work that would deliver the outcome?

See above

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- Advise on strategic policy and guidance (CNPA lead on advising on the impacts of proposals on landscape, under the SNH/CNPA casework agreement).
- We would be interested in using the Park to trial new ways of helping communities get more involved in thinking about the landscapes close to where they live and how they contribute to creating better places in which to live, work and visit.

E Do you agree with the indicators and targets suggested for this outcome?

It would be useful to include a measure of the extent to which new development has maintained and/or enhanced the sense of place and identity. Possibilities may include:

- The amount of land take to development around settlements, in relation to landscape capacity studies
- The number of landscape character areas affected positively or negatively by settlement expansion or other development.
- The proportion of development proposals specifically informed by landscape guidance

F Can you tell us about better indicators or more appropriate targets?

See above

G Can you provide data for better indicators?

No

Question 14: Outcome 8 - businesses and communities will be successfully adapting to a low carbon economy p48

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Yes. We do however think that there is some confusion in the language associated with this outcome. 'Adapting to a low carbon economy' (eg protecting carbon stores; using low carbon fuels) is wise but the phrase doesn't cover actions needed to adapt to the *effects of climate change* (eg. less snow-lie; more intense rainfall; longer growing seasons) nor to the indirect effects of climate change (eg changes in recreational use that result from changes in climate). We strongly recommend that this outcome is reworded to say that the Park will adapt to a low carbon economy **and** to the anticipated effects of climate change.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

- We think a package focussed on implementing core paths plans and promoting active travel is also needed in order to deliver this outcome.
- We would like to see more emphasis on climate change adaption. We are keen to develop more demonstration sites for what climate change means in terms of land or species management, and think that National Parks could be good locations. We'd welcome an extra work package to develop demonstration sites, or else expanding package 6 to cover this.
- We would also like to see more explicit action to deliver enhanced capacity for carbon storage in peatlands, soils, trees and vegetation. You could either include this here eg by expanding package 6, or in outcome 2.

C Are there any better packages of work that would deliver the outcome?

- The local development plan, sustainable design guide and carbon emissions from general development SPG will all be useful ways of helping to deliver this outcome.
- You might want to consider an awareness raising work package. This could include promoting awareness of climate change adaptation to visitors in interpretive material; and a 'citizen science' programme in which residents and visitors are encouraged to contribute to efforts to monitor the effects of climate change eg. flowering of spring plants; fruiting of autumnal trees etc to inform understanding of potential seasonal changes in the Park.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We will seek to reduce carbon emissions from our own operations including NNRs, and are happy to share our experiences with others (eg our use of a wood chip boiler at Achantoul).
- We can advise on carbon management of land and on measures that may help natural heritage interests adapt to climate change.
- We would be interested in working with you and other partners to establish a climate change demonstration site as described above.
- We can help by mapping carbon rich soil units in the Park and providing you with the data (see SNH information note 318 (<http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-rocks-and-minerals/soils-and-development/>)). Please contact Patricia Bruneau to discuss this further, including obtaining digitised data under sub-licence (patricia.bruneau@snh.gov.uk).

E Do you agree with the indicators and targets suggested for this outcome?

We recommend including indicators that cover adaption measures. Suggestions include one or more of the following:

- Natural flood management within flood management plans
- Proportion of natural flood plain able to be used for attenuation
- Extent & percentage of new developments in flood plains
- Effective implementation of SUDs in planning policy
- Demonstration projects to highlight adaptive management eg natural flood management in practice

F Can you tell us about better indicators or more appropriate targets?

As above.

G Can you provide data for better indicators?

No

Question 15: Outcome 9 - The Park's communities will be more empowered and able to develop their own models of sustainability p51

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

You may want to consider extending this outcome to cover communities of interest in addition to communities of place.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

No strong view – we don't have core expertise in this area of work

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We may be able to help fund delivery of some community projects, depending on fit with our funding priorities (click on 'funding priorities guidance' at the bottom of this page: <http://www.snh.gov.uk/funding/our-grants/what/our-funding-priorities/> to find further details of our target groups and the outputs we are looking for).
- We will advise on any community projects that could affect designated sites.
- We will work with local communities on the NNRs we manage.

E Do you agree with the indicators and targets suggested for this outcome?

No strong view – we don't have core expertise in this area of work

F Can you tell us about better indicators or more appropriate targets? & G Can you provide data for better indicators?

No

Question 16: Outcome 10 - The Park's recreation opportunities will have improved health and enjoyment of residents & visitors p54

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

We support the inclusion of an outcome concerned with improving recreation and enjoyment. Given the emphasis on health, you may want to consider whether this outcome should also

cover (a) other forms of community sports and recreational facilities that can improve health and are mentioned in some of the community visions eg. sports fields and centres, and (b) snow sports in the light of the recent HIE report.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

To ensure that enjoyment is increased as well as health, more emphasis is needed on work packages to enhance enjoyment of the special qualities and enhance the quality of recreational experiences.

C Are there any better packages of work that would deliver the outcome?

- The work packages are fairly focussed on paths. Are there any issues concerning access to water that should be addressed through this outcome?
- We particularly welcome package 2. There may be opportunities within this package to develop a programme aimed at encouraging young people, in order to help increase the range of people participating.
- Sustrans may be able to help deliver package 3.
- We're not convinced that a 'mountain bike development cluster' (Package 4) is in itself a good solution to the needs to increase overall levels of cycling for transport and for leisure. It may be part of the solution. Investing in key missing links in the network of safe cycling opportunities that link places where people live in the Park might be equally, or more, important.
- We recommend adding Ranger Services as key delivery partners for some of the work packages.

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money.

- We can advise on the 'active cairngorms' project, and possibly offer financial support if any elements have a good fit with our funding priorities. Our key target groups are young people; people on low incomes; people from black and minority ethnic communities; people with poor health; disabled people; people who are aged 55 years and over; women. (click on 'funding priorities guidance' at the bottom of this page: <http://www.snh.gov.uk/funding/our-grants/what/our-funding-priorities/> to find further details and the outputs we are looking for).
- We will seek to maintain and, where needs and resources permit, enhance the recreational opportunities available on the NNRs we manage. We will also support their use by Healthwalks groups.
- We can advise on management and promotion of paths and upgrading long distance routes, particularly on any implications for designated sites.
- We will promote use of existing long distance routes via the Scotland's Great Trails initiative, on which we work closely with visitScotland.

E Do you agree with the indicators and targets suggested for this outcome? & F Can you tell us about better indicators or more appropriate targets? & G Can you provide data for better indicators?

We have some alternative suggestions for indicators:

- The number of adults (rather than people; to reflect data availability) making one or more visits to the outdoors each week. We are in discussions with you about boosting the national parks sample size in our proposed new national survey of how people use, value & enjoy nature & landscapes. This new survey might also provide data to underpin indicators for Outcome 1.
- The number of people taking part in health walks in the Park
- The number of people taking part in guided walks in the Park

SECTION 5 Managing competing demands on the land - Land use strategy (pages 57-82)

Overall comment: We're not clear at present how this relates to the preceding sections of the Plan, and how it should be delivered (via the work packages associated with outcome 5?). The 'policy directions' overlap partially but not wholly with both the long term outcomes and the short term outcomes, which all seems quite confusing. It is also not clear whether the 'policy directions' are long term or short term. To reduce confusion there may be scope to merge the 'policy directions' with either the long term or short term outcomes as appropriate, and then use the land use strategy to explain in more detail how the outcomes relevant to land use should be delivered.

Question 17: Do you agree with the key principle on page 58?

Yes, as long as the long-term outcomes are updated in line with our recommendations outlined above in response to Q4 (ie to more explicitly cover climate change, ecosystems approaches etc).

Question 18: If not, why?

Question 19: Do you agree with the opportunities and threats identified, if not why?

Opportunities. Recommend (additions in italics):

- Enhancing habitat *condition, diversity, scale and connectivity*
- Conservation of *iconic or threatened* species, or simply '*enhancing biodiversity*'
- *Enhancing carbon storage capacity – in both soils and above ground biomass (trees)*
- Rephrasing the statement about 'managing the balance of land use...' to be more specific. The nub of this opportunity probably reflects the 'key principle' on p58, so it could be rephrased as '*Deciding on the best possible combination of long term outcomes to deliver in individual areas, and creating appropriate delivery mechanisms.*'
- *More collaborative land use planning and management across land management units and habitat types.*

Threats. Recommend (additions in italics):

- *Loss of biodiversity*
- *Loss of landscape character including wildness*
- *Potential for conflict between land managers with different priorities*
- *Impact of climate change on the long term suitability of land to grow crops or support valued species and habitats.*

We have a number of more detailed comments on the SWOT analyses for the different habitat types, which we can forward if useful. It might be helpful to amalgamate these analyses with Table 8 in the SEA Environmental Report, in order to produce single lists of SWOT factors, and demonstrate more clearly the logical links between these and your environmental objectives. We also feel it would also be useful to clarify whether bogs are covered in the 'mountains, moor and heathland' habitat type or 'rivers, lochs, wetland and floodplain'. Bogs are significant stores of carbon and water, so worthy of explicit mention.

Question 20: What are the particular opportunities and threats that you think the Plan should address between 2012-2017?

All of the key threats and opportunities – as it already does.

Question 21: Policy direction 1 - enhance the special landscape qualities p67

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- If the intention is to enhance all the Special Landscape Qualities as identified in Table 2.1, this is a very ambitious target that isn't likely to be delivered by the work packages currently set out in the Plan. We recommend focussing on the qualities that are in particular need of enhancement.
- In general the policy approaches seem worthy but quite vague and generic. It might help to include details of the work packages proposed to deliver them in the next 5 years, and explaining how the landscape framework should be used to inform land use decisions.
- We recommend that the policy approach to 'enhance habitat connectivity' is expanded to 'enhance habitat condition, diversity, scale and connectivity' for the reasons outlined in our response to Q8A.

Question 22: Policy direction 2 - enhance biodiversity p69

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- Again the policy approaches seem worthy but a little vague and process-dominated.
- It would be useful to include an objective to *enhance the states of key habitats and species beyond designated sites* (eg via habitat connectivity, diversity and increasing patch size, rather than simply to monitor them).
- There is a lot of overlap between this policy direction and the associated approaches and short term outcomes 2 and 3, but we're not really clear why some points are highlighted in one or other section of this plan, and others in both. In general, the text accompanying the short term outcomes contains a more useful level of detail, and could be usefully referred to here. For example, it seems odd not to explicitly refer to grazing management as a key tool to deliver this policy direction. If the aim is to enhance woodland cover and improve connectivity, this will be easier to deliver if the Plan is clear that this can only be achieved with more collaborative approaches to deer management and more effective management of grazing impacts.

Question 23: Policy direction 3 - expand and enhance woodland p71

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- This 'preferred approach' table contains a useful level of detail.
- We recommend expanding the 'policy approach' about enhancing woodland cover and connectivity so that it also covers *increasing woodland patch size and age class & species diversity*. These are also required to enhance woodland condition and improve resilience to external changes eg climate change. We think further analysis of constraints and trade-offs is needed before deciding whether 25% is the right level of woodland cover to aim for in the Park. An alternative style of target that would be easier to justify would be to aim to increase the size of the small patches of woodland (eg between 2 and 5Ha). We'd be happy to work with you to develop a suitable target along these lines.
- You may want to expand the policy approach about woodfuel to include encouraging use of local wood for timber.

- It would also be worth emphasising that a collaborative approach across land management units is essential for achieving the connectivity and flood management benefits of this policy direction.
- We note that the native woodland potential map on p73 lists as a native woodland component '*Beech with bramble*'. This isn't a native woodland type. This map is different to our own native woodland potential map, and it would be useful to explore the reasons for the differences. It is also probably worth explaining that many of the areas identified as being potentially suitable for woodland are also identified as peat or carbon-rich soils, which will limit their suitability after all. Once you have our carbon-rich soils map and data that we refer to at Q 14d above, you should be able to combine these and other datasets to produce better spatial guidance on preferred areas for woodland expansion.

Question 24: Policy direction 4 - enhance resilience of habitats and land use to climate change p74

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- To enhance the resilience of habitats to climate change requires improving habitat condition, scale and diversity, as well as enhancing connectivity. Diverse biological communities are thought to be more likely to adapt to climate change and climate variability than impoverished ones, and where there is high genetic diversity the ability for a species to remain in an area is enhanced. We recommend the first policy approach is expanded to cover these issues. It's also worth being aware that enhancing connectivity can have downsides, eg increasing the potential for pests, diseases or INNS to spread, so won't always be the best solution everywhere.
- We are currently preparing Adaption Guidelines as part of our Climate Change Action Plan. These guidelines include some additional points that it would be useful to include as policy approaches here: making space for natural processes; improving habitat management; reducing other pressures (eg grazing); and taking an adaptive approach to management. Different approaches will be particularly relevant for different ecosystems, eg for montane habitats 'reducing other pressures' will be important; whereas to help deal with increased dynamism on hill slopes and rivers, 'making more space for natural processes' will be important, along with 'reducing other erosive pressures' such as grazing. We will send you a copy of our current draft separately.
- We recommend highlighting the role of blanket bog, peatlands and carbon-rich soils in storing carbon and the benefits of managing these habitats in ways that minimise erosion and allow existing bare ground to regenerate (either here or under policy direction 5). It would be useful to expand the 2nd policy approach to include restoring eroded peatlands, in addition to avoiding further damage. .

Question 25: Policy direction 5 - contribute to a low carbon economy p75

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- Some of these 'policy approaches' – especially the first and last – sound more like useful packages of work for the next 5 years to include under 5-year outcomes 7 or 8.
- We recommend an additional policy approach to support public transport and active travel. This could cover paths, cycle lanes, carriage of bicycles on buses and trains, and lower carbon ways of getting people to the Park and perhaps to the ski slopes.

- Is a reference needed here to the role of the local development plan and the sustainable design guide in ensuring new development has a low carbon footprint?

Question 26: Policy direction 6 - provide high quality recreation opportunities p76

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- This policy direction has a slightly different overall aim (quality recreational opportunities) to the related 5-year outcome (improving health and enjoyment via recreation), which seems a little confusing in the absence of any further explanation.
- We welcome the final 'policy approach' about trialling new approaches to managing recreation in sensitive environments and recommend it is adopted as a package of work to help deliver 5 year outcomes 1, 2, 3 & 10.
- To meet the overall policy direction, an additional 'policy approach' focussed on further improvements to the existing path network to improve its functionality and the quality of recreational experiences is probably needed.
- It may be worth adding a policy approach to improve management of the interactions between recreational users. This seems to be a particular issue at some popular sites, so efforts to re-distribute visitors could be beneficial.
- It would be worth clarifying that this policy direction includes waterborne access.
- To improve the quality of recreational experiences, we recommend adding a policy approach concerned with raising awareness and understanding of the special qualities amongst recreational users.

Question 27: Policy direction 7 - target proactive advice and public support to help land managers deliver multiple public benefits p78

A Do you agree with the proposed approach?

Yes, although it reads more as an action than a policy direction. A better alternative may be to word the 'policy direction' something like 'manage land to deliver the best combination of multiple benefits' and then 'targeting advice and support' could be a delivery mechanism.

B Would you suggest a different or additional policy approach?

Again, some of the 'policy approaches' read more as actions. In particular, we would welcome inclusion of the first policy approach (about identifying public benefit priorities) as a 5 year work package.

Question 28: Policy direction 8 - develop sustainable patterns of settlement growth, infrastructure and communications p80

A Do you agree with the proposed approach?

Yes

B Would you suggest a different or additional policy approach?

- Is a reference needed here to the role of the local development plan and the sustainable design guide in ensuring new development has a low carbon footprint?
- Given that there's a policy approach to support improvements to the A9 and the main railway, to deliver sustainable communications patterns there should presumably also be policy approaches to support active travel, and the availability and use of a variety of forms of public transport and vehicle-sharing.



Scottish Rights of Way and Access Society

Cairngorms National Park Authority
Granttown on Spey
Moray
PH26 3BR

8 December 2011

Dear National Park

CAIRNGORMS NATIONAL PARK DRAFT PARK PLAN

Thank you for the opportunity to comment on the draft park Plan for the period 2012-2017. This response from ScotWays broadly follows the set questions, but we do not attempt to answer all of them, especially those outwith our remit. But we begin with a small number of general points.

- First, while the purpose and linkages between this plan and other planning documents are set out clearly, there is quite a number of layers to the structure of the plan, beginning with principles, then key themes, vision statement, strategic objectives, then outcomes, and policy directions; and all this is framed by the four statutory aims. This will be a bit confusing for the general reader, so the structure of the plan needs better explanation, especially the divide between outcomes and policies, where at times there seems to be some uncertainty on policy direction – say on landscape.
- We think that there might more evident connection between this plan and the oncoming development plan, especially in highlighting matters in this present plan as potentially material under town and country planning procedures, and where planning has a key role in determining the best way forward. The new development plan is yet to come and it will need key points of attachment.
- Third, responses to consultations will inevitably focus on suggestions for change, and while we offer some criticism below on the detail, (and on the structure above), we should record at the outset that there is much to commend in what is proposed, both in the broad ambition, in the general direction and in the supporting detail.

INTRODUCTORY TEXT

Questions 1-3 Descriptions of valued features can sometimes be expansive: in part this arises from the long contested history of claims for special protected-area status, in part to underpin what follows in the Plan. But also important, and a difficulty with this set of questions, is the reality that what you are attempting to encapsulate in the accolade descriptions of attributes (with which we have no real difficulty) are the high values that many people hold for the area: so you are dealing here as much with values held as well as intrinsic value identified in the attributes.

Inevitably, we would assert that the park area has very high recreational value, which is inherent in most of the listed physical and experiential attributes. Recreational value is often underplayed as a concept because it is not backed up by statutory designation, and by the related apparatus of management and control. Enjoyment therefore tends to be presented at the end of analyses as an overlay on the 'important stuff', when in practice it is a critical

justification for the basis of caring for the 'special values': indeed it is often the recreational bodies who take the lead in challenging or addressing adverse change to landscape.

However, in this introductory section, there is a welcome emphasis on landscape and enjoyment, as this helps to provide a balance to the long-standing emphasis in the Cairngorms for primacy of nature conservation. We say this not to dismiss in any way the conservation importance of the area, but as a matter of helping ensure a better balance, so that landscape and recreational values are not seen as secondary elements in determining the best way forward.

OUTPUTS TEXT

Question 4 The answer to this question must be yes; the previous list was too long, and it attempted to serve too many different themes, for some of which the Park does not have the either the resources or any statutory engagement. While the intention behind these original outcome statements was entirely proper, some of them either had high ambition, or they sought too much at this stage from other partner bodies. It would be reasonable that the Park continue to engage with some of the more difficult issues, as desirable longer-term goals – say the sustainable transport agenda. But the process needs to start at a more realistic level, with the main effort still being on those areas of work where the Park has a clear remit and where it can best take a lead. That said, some of the practical achievements recorded from the first plan seem impressive: notably, the degree of training, the extent of action at the community and business level, also with land managers, and all this seems important in building a base of support and expectation to achieve more.

Question 5 and 6 In practice, it is difficult for organisations outwith the Park to comment on the detail of revision to the list of outcomes, as requested in question 4: to a degree, this has to be led from the experience of the first Plan, and there now is an evident requirement to link more closely with the national policy agenda – on the latter, there is a risk of going further in ticking boxes for the national objectives than is perhaps reasonable. But we agree with the intention to shorten the list of outcomes, and it is good to couch the outcome statements in language which is more accessible.

However, by doing this, another issue arises, namely, that some of these statements are now quite generalist, with a quite diverse range of actions. In addition, there is no direct linkage between individual outcomes back to the three strategic objectives. But this may be acceptable in that many of them, through their generality, can be seen to serve more than one objective: thus the wildness outcome could be said to serve all three strategic objectives, in one way or another. May we make some general points about the outcome statements that link to our remit?

Question 10 We applaud the commitment in the plan to safeguard the wild character of the Park. The actions might also include trying to promote some retreat from past land management activities that would be unwanted today – say outlying conifer plantations, and sensitivity in the reconstruction of upland paths could contribute. There is an implication that intervention to expand woodlands (we presume native in character) would contribute to wildness, but much would depend here on the methods employed and the degree of intervention. This would of course be re-wilding in a nature conservation sense, rather than an underpinning to wildness in a recreational sense, and care is needed to not get these concepts confused. We are less than convinced by the suggested indicator, as wildness is an experiential construct, not amenable to formal measurement. Perhaps an account of main management achievements/goals would suffice.

Question 13 This seems to be the main landscape outcome, although there is text on habitat enhancement at Outcome 2 that could contribute to substantially enhancing the appearance of parts of the Park. There is just a risk that landscape is falling between two outcome statements. We think that there is a need for some broader statements on the landscape implications of land-use change, as well as on development in general, in order to secure improvements to or to avoid impacts on amenity. Some of the introductory text to Outcome 7 is saying the right things, but these thoughts are not all carried through to the actions, which are resolutely about the built environment.

So a wider approach is needed here (or one that is consciously spread over other topics), to ensure that amenity is adequately addressed in all land use change. This seems like an important area for good connection to what should be material issues for the care of landscape under the development plan. Much of this is not within the planning regime, but some is. An example of what we have in mind is that it is possible to drive up the Glen More road and see little difference to roadside amenity since the Park was established. This outcome statement requires a wider set of indicators, some about advisory work, and some about practical action.

Question 16 Open-air recreation is our third priority. We welcome the broad direction of this outcome, and agree that, at this stage in the development of the core path plan, there should be some priority to recreation provision on low ground, given the need to implement the new network, through both infrastructure improvements and promotion of more use of the network. However, we think that it is also important to sustain momentum on the management of upland paths through COAT. The suggested indicators are not really measurable: it would be better to use more practical targets such as length of upland path worked on; core paths signed and the like. Although perhaps contradicting what we have said above on wildness (but acting in sympathy with the fourth policy approach under Policy Direction 1), some attention should be given to restoring past bridges that provided safe access, notably at Carnachuin in Glen Feshie and at the Geldie.

LAND POLICY TEXT

Questions 17/18 We don't find this a very useful principle: it is just too woolly and not appropriate everywhere. If a grand opening statement is needed, then a tactfully worded ambition about all land management helping to deliver the Park's objectives would be better: alternatively, provide a general hook to the national document.

Questions 19/20 The SWOT analysis over the range of ecosystem types all seems reasonable, and we don't want to comment on its detail, although it has to be noted that the approach taken in this section is shifting the balance back towards a conservation-led approach, where the recreation values of the area are beginning to be somewhat squeezed out, because of the emphasis on action for land cover and processes, for example, in the listing of the most significant opportunities (p.66). The classification creates a separation between mountain, moor and heath, and semi-natural grassland, which may not be quite the right split across the altitudinal range in the Cairngorms between enclosed farmland and high montane habitats, which may perhaps be an outcome of the ecosystems classification having a UK focus. From here on, we comment briefly on some policy themes that are close to ScotWay's purposes.

Questions 21 We support the general approach here, especially the intention to conserve and enhance wildness. In some regards this seems to redress (but only in part) the problem referred to above at Question 13, namely the lack of a coherent statement on landscape, but this text is itself incomplete in not covering the impacts of development and other land use change. Thus a welcome policy comes in later, against wind farms, which we support, but

this policy, we presume, refers to land within the Park, and a more qualified statement might be needed for wind farms proposed adjacent to the Park that impinge on its special qualities.

Question 23 We broadly agree with this policy on woodland expansion. While the intention is not overly ambitious, if long term, it is ambitious if intended as a five-year goal. However, this ambition is rather unclear as to its geographic focus and the interactions with other policy ambitions: on the one hand, better land for better quality trees might well interact adversely with farming, while more semi-natural woodland could affect valued open country, and there are well known and difficult issues over how best to implement woodland recovery. We would regret any extensive use of fencing.

Question 26 A number of issues arise here. Like some of the other policies in his section, the approach is quite generalist. The Park, however, is an Access Authority with functions and duties under the 2003 Act – it may be that the recreation strategy is the best place for the detail, but if this policy is to stand as the Park's most up-to-date and over-arching policy statement on its current approach to recreation then there is more to be said:

- first, the public have access rights, and the tone of the approach should be about management for (not of) public access;
- while people have access rights, much more effort is needed to enhance accessibility, and the Scottish countryside is often not very accessible, say, in finding somewhere to leave a car – less of a problem, of course, in the upland areas of the Park;
- rather than focus on people being a problem for habitat and nature, and thereby managing them, it might be better to lead more on promoting responsibilities under the Code; and
- we welcome the access for all approach, referred to also at Policy 1, and the commitment to the core path network (and earlier commitments to ongoing management and maintenance of paths).

At various points, questions are asked about the commitment of relevant organisations to deliver the plan's policies. It would, however be unrealistic to expect any major contribution from a small voluntary organisation of ScotWays' size, operating over all of Scotland. We see ourselves as a body representing users of the Park; we offer certain services that we hope are of use to the Park such as CROW, legal guides, guidance on routes through our *Scottish Hill Tracks* guide (for which a revised edition will be available soon) and we have some signposting in the Park. Recently we offered robust evidence in support of the Park at the Dorenell wind farm inquiry and we are likely to do the same, should an inquiry arise for the Allt Duine proposal.

Yours sincerely,

John W Mackay

Protecting Scotland's wildlife for the future

Cairngorms National Park Authority
Freepost nat 21454
Granton on Spey
PH26 3BR

24 November 2011



Dear Sir/Madam,

Re: CAIRNGORMS NATIONAL PARK PLAN - 2012-2017

The Scottish Wildlife Trust (SWT)¹ has the following comments regarding the Cairngorms National Park Plan 2012-2017

Main points:

The Cairngorms National Park (CNP) was designated primarily because of its outstanding natural and cultural heritage. The National Parks (Scotland) Act 2000 requires that the CNP is managed in such a way so as to fulfil the four aims of the Act which are:

- to conserve and enhance the natural and cultural heritage;
- to promote the sustainable use of the natural resources of the area;
- to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
- to promote sustainable social and economic development of the communities of the area

Where there is a conflict between the conservation aim (first aim) and any of the others aims, **the first aim takes precedence.**

The Scottish Wildlife Trust believes that the aims of the Act, with the **conservation aim** (i.e. the first aim), having priority above all others, should set the context for, and be at the heart of the proposed Cairngorms National Park five year plan. This is in accordance with the National Parks (Scotland) Act 2000. We do not believe that the spirit and possibly the letter of the law is being applied in the present draft of the CNP plan.

The Plan should recognise that in some circumstances it will not be possible to deliver all of the aims simultaneously and where this is the case the first aim of the Act overrides the other three aims- to state otherwise (as the Plan tries to do on page 9) contradicts the Act.

Specific points:

Five year outcomes for the park (page 23) - under *our 10 proposed five-year outcomes for the Park are*: Point 2 should state: the quality and connectivity of habitats will have improved, enhancing the biodiversity and landscape at a Park scale (page 30). Depending on what definition of landscape is used, not all 'landscapes' have high biodiversity value.

¹ The Scottish Wildlife Trust was founded in 1964 to take all appropriate measures to conserve the fauna, flora and all objects of natural history in trust throughout Scotland. With over 35,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

Protecting Scotland's wildlife for the future

Table 4.1 (page 25) should recognise the contribution that a high quality and biodiverse environment makes to the delivery of many of the national outcomes (NO). E.g. NOs 1, 4, 6, 9, 10, 11, 13 and 15 link to 2, 3 and 4 of the CNP five year outcomes.

Indicator of target two (page 32) could include a water quality indicator and an indicator to measure increase in natural tree and scrub regeneration.

Indicator of target 7 (page 46) could include an indicator along the lines- number of developments that have increased biodiversity value of development site.

5 Managing competing demands on the land – land use strategy (page 57). This should be set in the context of the four aims of the Act with reference to the fact that where conflicts arise the first conservation aim takes precedence and should guide land use strategy in the Park.

Policy direction 2 (page 69) should include enhancing the national ecological network (which is referenced under 'Greening the Environment' in National Planning Framework 2)

Policy direction 5 -Contribute to a low carbon economy (page 75)
Should include active management and restoration of degraded peatlands - to enhance carbon store

Policy direction 8 (page 80) - An Camas Mòr- please refer to Scottish Wildlife Trust's response to Local Development Plan - Main Issues Report.

It should also be recognised that *developing sustainable patterns of settlement growth and infrastructure* requires avoiding the mistakes made in past developments in the Park (e.g. poorly designed, car dependent, suburban sprawl type developments which are not sympathetic with the natural setting of the Park and do not work with the 'grain of nature'). Production of a high quality masterplan preferably through a high level of community engagement (e.g. a charrette type process) that recognises the 'quality of place' is the way forward for new development in the Park. New build developments should reduce carbon emissions through their design and use of materials; the design layout should also reduce car usage by ensuring developments are compact, transit orientated, walkable, and connected to local amenities such as shops and greenspace.

The Scottish Wildlife Trust would like to be kept informed of the progress of the Plan.

Yours faithfully,



Dr Maggie Keegan
National Planning Coordinator

From: Seafield Estate
Sent: 08 December 2011 15:14
To: Park Plan
Subject: Draft Cairngorms National Park Plan 2012-2017 Public Consultation

Dear Sir/Madam,

We write in response to the above consultation. This response deals primarily with forest and woodland management issues raised in the document and uses the numbered question format for responses but not the sub questions as the response could not easily be fitted to their structure.

Question 8

The emphasis here is on native woodland and the non-market benefits of native woodland yet it makes no reference to the productive capacity of native woodland (predominantly Scots pine) and the economic and social benefits of this business in the Park. Full account should be taken of the potential of native woodlands to provide local and industrial scale timber production to support jobs and communities in the Park as many of the non-market benefits alluded to flow from the results of this activity.

While recognising the habitat and landscape benefits of native woodland, the requirement to provide for "increased carbon storage in woodland" is better served by productive conifer plantations which ultimately produce material which can be utilised, thus locking carbon into products or structures. Subsequent planting or regeneration can then assimilate carbon at a greater rate than unmanaged woodland. This links to outcome 8.

The target of 5% woodland expansion, based on figures contained in the Park's Forest and Woodland Framework equates to around 4,000 hectares or 0.88% of the park area. To achieve this would require planting of around 800 hectares per annum through the plan period. Given the indicative figures discussed at the Cairngorms National Park Land Management Forum in September 2011 this could be considered to be an unambitious and readily achievable target.

Question 16

The concentration on promotion of recreation opportunities is to be welcomed. However, no recognition is made of the need to educate those participating in recreational activities of responsible access in relation to land management operations. This is particularly important if the focus is on encouraging those who currently do not participate in outdoor recreation and may not have a full appreciation of rural land management.

Question 19

Woodlands & Forestry

The recognition of productive forestry, in particular native productive forestry in this section is to be welcomed. The lack of reference to this in Outcome 2 seems to indicate a lack of consistency in approach in constructing the document's sections on woodland.

In the Strengths, Weaknesses, Opportunities and Threats table the comment on exotic species (weakness) is an inappropriate generalisation which grossly oversimplifies the actual position in terms of scale of this issue and its impact. This is a fact recognised in the Forest and Woodland Framework (page 38) which specifically sets out to retain a proportion of exotic species where

appropriate. The proportion of (or inclusion of) exotic species could also be seen as a strength in view of climate change and current disease threats.

Question 23

Policy Direction 3

In principle this section is very positive and links appropriately with the Forest and Woodland Framework. It does reinforce the rather unambitious targets in Option 2 when considered against the 5% of land area (some 22,000 hectares) required to meet the Government target of 25% woodland land cover.

There is also a considerable list of constraints which somewhat limit the positivity of the section suggesting that meeting the Park's criteria to enable woodland expansion may be more challenging than the initial positivity would lead one to believe.

Yours faithfully

Seafield & Strathspey Estates

Cairngorms Draft National Park Plan (NPP) 2012 – 2017 – sportscotland response

sportscotland is the national agency for sport in Scotland. Our vision is of a Scotland where sport is a way of life. Our goals are to increase participation and improve performance in sport and to create a world class sporting system.

Our comments on the draft NPP focus on the outdoor and adventure component of sport, defined as those sports which use, are attracted to and dependent on Scotland's natural outdoor environment for their practice. A greater and more integrated role for outdoor and adventure sport is identified as a key success measure in our corporate plan.

sportscotland's response is derived from our policy position on outdoor sport as set out in our policy document *Out There*

<http://www.sportscotland.org.uk/ChannelNavigation/Topics/TopicNavigation/Sport+in+the+outdoors/Out+there/>

Our comments are set out below.

Introduction

sportscotland is fully supportive of the discussion set out on page 9 of the NPP on implementation of the national park aims. We agree with the position that all four aims need to be delivered together and that conservation should not be seen as the priority aim. This position accords very closely with our own position as set out in *Out There*. *Out There* stresses that conservation should only take precedence in situations of conflict between park aims and that this should not translate into a general presumption that conservation is the primary aim of national parks. Section 4.4 of *Out There* states that it is important that national park aims are achieved in a balanced way and are given equal consideration, promotion and resources in the operation and development of a national park.

This said, **sportscotland** is fully supportive of the role and status of conservation in a national park.

National Park Principles (pg 10)

Parks for All

We strongly agree that engagement with local communities is important in sustaining the park. At the same time, **sportscotland** would like to see recognition made in this principle of the national importance of national parks and the need to engage with national interests and interests from outwith the park in decision making and debate.

Trialling new approaches

sportscotland supports this principle. *Out There* states in paragraph 4.3.2 that national parks should act as best practice exemplars in the promotion of recreation and evolve as centres of excellence in this area. We strongly agree that good practice should be rolled out across Scotland.

Question 1 – special qualities

sportscotland is fully supportive of the recognition given in the plan to recreation (including sport) being a special quality of the park. We strongly agree with the recreational attributes outlined in the plan (page 13) and the references to mountaineering, skiing, adventure sports and outdoor activities. We consider recreation to be implicit in the four key themes outlined on page 14 and note and support its specific reference as a component of special landscape qualities as outlined in table 2.1.

For information, and as part of the relationship you have with Loch Lomond and the Trossachs National Park; in responding to recent consultation on their National Park Plan we have requested that Loch Lomond and the Trossachs look again at including recreation as a special quality of that National Park.

Question 7 - Five year outcome 1 – learn, enjoy and conserve

In relation to the work identified to deliver this outcome, **sportscotland** agrees with the first bullet point on the need to improve marketing and promotional material. In addressing this issue please see our response to question 16 below and our comments on the promotion of information on outdoor and adventure sport in the park.

We support the final three bullet points outlined on page 28 of the plan on the need for continued learning and training within the park. In relation to this it is important to appreciate the role that Glenmore Lodge can play in delivering some of these actions and to involve them fully in any work the park may want to progress in this area. It would be useful to add the Lodge to the list of partners who could contribute to the delivery of these actions.

Question 9 - Five year outcome 3 - conservation

In relation to the package of work identified and bullet point 8 (page 34) on managing recreation impacts, it is useful to be aware of **sportscotland's** policy position in this area.

As is recognised in section 3.3 of *Out There*, natural heritage is integral to the enjoyment of sport in the outdoors and **sportscotland** fully recognises that the successful promotion of sport in the outdoors must take full account of the importance of the conservation and sympathetic management of Scotland's natural heritage.

At the same time it is important to appreciate that for sport to happen the outdoors and the natural heritage must be able to be used. It is important to realise that not all natural heritage is particularly rare or valued or unable to accommodate use and it is important not to assume impacts from sport on the natural heritage.

Section 3 of *Out There* is clear that it is important that a considered and informed approach is taken to management of sport in the natural heritage, ensuring that it is properly justified and evidenced and based on a full understanding of all the issues and interests involved.

Sport and recreation can and does take place in areas and sites designated for their natural heritage value and can do so with no or with acceptable impacts. Designated sites can provide very important and attractive locations for sport. **sportscotland**, for example, in consultation with the National Park, successfully developed a mountain bike trail at its national training centre Glenmore Lodge, on a site within a National Scenic Area, a SSSI, a SPA and a SAC.

These points made, **sportscotland** is fully supportive of bullet point 8, strongly supporting the need for improved understanding. The park will be aware of the guidance **sportscotland** was involved in developing entitled Monitoring Access and Recreation at Sensitive Natural Heritage Sites

<http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=942> which will be useful in the implementation of the identified action.

Question 10 – Five year outcome 4 - wildness

sportscotland agrees that this is an appropriate outcome for the NPP. In particular we support the recreational benefits this outcome will deliver. As outlined in section 3.5 of *Out There*, wild land is important for sport engendering particular emotions, responses and challenges. This in turn can present a distinct and sometimes rare recreational experience that is particularly sought by some recreationists.

Question 16 – Five year outcome 10 - recreational opportunities

In relation to this action **sportscotland** has been working with SNH and Perth and Kinross Council on a report looking at barriers to participation in outdoor and adventure sport. The report is currently being finalised and we will send you a copy once it is ready. This will hopefully be of use to the park in encouraging and facilitating participation.

In relation to the work programme proposed to deliver the outcome we strongly agree with the intention to promote the core path network and other promoted routes. At the same time, we would like to see the range of opportunities to participate in outdoor and adventure sport promoted in the park. It is important to appreciate that access rights, although fundamental to outdoor sport, do not represent the totality of outdoor sport and recreation and that there could be

significant benefits to participation from promoting the range of opportunities that exist within the park.

In addressing this issue it will be important to provide information on a range of activities, such as rock climbing, canoeing, mountain biking, horse riding etc, and to involve sport and recreation interests in the development of knowledge. Information should let people know what opportunities exist, where they are and how to get to them and should indicate what opportunities consist of including what level of participant they are suited to.

Information could usefully link to equipment hire and sale in the park and to guiding and teaching/training providers, helping to support private enterprise.

In promoting opportunities **sportscotland** recognises that to some participation in outdoor sport is not necessarily about being told where sites are and that part of the experience is about finding these things out for yourself and relying on your own resources and initiative. There are also those who do not want information to be broadcast about sites that they have worked hard to find and develop themselves. It is also the case that those who mountain bike or rock climb or canoe at a certain level are likely to know or know how to find out where opportunities are. In addition, there may be some sites with capacity issues that it would not be sensible to promote further. And it will be important to guard against promoting sites and opportunities that may be beyond the levels of skill and experience of some people.

In promoting opportunities in the park it is worth thinking about what opportunities you want to promote and it may be useful to focus on a particular type of experience and on a particular type of user. **sportscotland** would welcome exploring this area further with the National Park and other relevant partners.

In relation to the third column of the table on page 55 it will be important to add **sportscotland** as one of the partners in the Active Cairngorms project. **sportscotland** is fully supportive of this project and keen to be involved and help in its implementation. Likewise, we note the reference to **sportscotland** in relation to the now established mountain bike cluster. Again this is an initiative that we fully support and will look to help and engage with as it develops. It is useful to note that **sportscotland** is engaged with the mountain bike project through our place on the national consortium, as well as through the cluster approach. The role of Glenmore Lodge and **sportscotland** headquarters staff will be relevant to both projects.

Question 17 - Managing competing demands

sportscotland agrees with the key principle on the basis that recreation and associated outdoor and adventure sport is considered to be one of the multiple benefits to be delivered. From the text on page 57 of the Plan we assume this to be the case.

Question 19 - Managing competing demands – opportunities and threats

We fully support the references made throughout the ecosystems identified to their importance for outdoor sport and recreation. In relation to the different ecosystems identified, we offer the following comments

- Farmlands – useful to include reference to access and recreation improvements/provision available through farm subsidy payments as an opportunity.
- It would be useful to make reference to the growing importance and popularity of mountain biking in some of the ecosystems (particularly woodlands and mountains) and to identify this as an opportunity both for sport development and health reasons but also for economic development in the Cairngorms.
- Woodlands – under the opportunity bullet on woodland creation it would be useful to add a reference to the need for new woodland development to consider recreational needs in their development (please see answer to question 23 below).
- Rivers etc – one of the weaknesses here could be conflict between canoeists and anglers and an opportunity could be defined to positively address this.
- Mountains - important to reference their importance for formal as well as informal recreation (depending on what your definition of informal is).

We note from this section of the plan that there is quite frequent reference to impacts from recreation on some of the natural heritage interests within each ecosystem and on the need to manage these. While we fully recognise the need for management we reiterate the comments we have made above in response to question 9 on the importance of taking an evidence based approach to recreational management. In addition it is perhaps useful to outline **sportscotland's** approach to recreational management as detailed in chapter 3 of *Out There*. The key points to note include:

- a positive approach, employing a range of techniques, avoiding the need for restriction of sport activity;
- approaches that are appropriate and proportionate to the situation they seek to address;
- the importance of dialogue and understanding in addressing any issues that exist;
- involving sport interests in decision making and those sport and recreation interests of most relevance to the issues being addressed.

sportscotland notes that there is no reference to the precautionary principle in the NPP. We are not arguing for reference to the precautionary principle in the plan but understand that its application may be implicit in the work of the national park. To this end it might be useful to be aware of our thinking in the precautionary principle.

sportscotland supports the advice on the precautionary principle set out in paragraph 132 of the Scottish Planning Policy and in particular the advice that the precautionary principle should not be used to unnecessarily impede development and that where the principle is applied, i.e. on the basis of uncertainty, research should be commissioned to remove that uncertainty. Section 3.4 of *Out There* <http://www.sportscotland.org.uk/ChannelNavigation/Topics/TopicNavigation/Sport+in+the+outdoors/Out+there/> sets out our own position on the precautionary principle which it will be useful for the park to be aware of.

In our response to the draft Loch Lomond and the Trossachs National Park Plan we have also made clear our position on the use of byelaws as a management tool. While there is no explicit reference to byelaws in the Cairngorms NPP it is perhaps worth repeating our position on this subject. **sportscotland** recognises the use of byelaws and agrees that they can be an appropriate management tool. We see them as a last resort management option however and only support their consideration after other more positive management measures have been tried and shown not to be effective. Byelaws can have a displacement effect and the park has to be clear on what impact byelaws could have on neighbouring countryside, both within and outwith the park, should their introduction be considered.

It is important for the park to take a responsible approach to its management proposals. The park is an exemplar in recreation management and **sportscotland** is concerned that byelaws, especially if imposed without trialling other options, could encourage other authorities to likewise use byelaws leading to restrictions over potentially large parts of accessible and popular countryside throughout Scotland.

Question 21 - Policy Direction 1 – special landscape qualities

It would be useful to give an example of what is meant by new and imaginative approaches to enhancing accessibility as outlined in the table on page 67. As it reads it is not fully clear what this approach comprises.

Question 23 – Policy Direction 3 - woodland

In relation to the preferred policy approach outlined it will be important to ensure that recreational interests are taken into account in woodland expansion. Opportunities to develop woodlands that provide for and are attractive to recreational use should be promoted. This will include consideration of factors such as species choice and mix, planting patterns, age structures, access routes to and through forests, felling regimes, path surfaces etc. It will be important for sport and recreation interests to be involved in developing proposals.

Productive native woodlands should also deliver recreational benefits.

Question 25 – Policy Direction 5 – low carbon economy

In relation to the proposed guidance on sensitivities to renewable energy, it will be important to include recreational sensitivities as part of this assessment. Scottish Government policy as set out in the Scottish Planning Policy is clear on the need to take recreational interests into account in considering renewable development. **sportscotland** was involved in a public inquiry into the development of an important canoeing river for a run of river hydro scheme. Ministers ruled against the hydro scheme in part because of the impact it would have on the canoeing interest. It is important to be aware of and understand recreation interests in developing guidance.

Question 26 – Policy Direction 6 – recreation opportunities

It would be useful for the plan to give some more detail on what the visitor pressures are in different parts of the park. It is important to fully understand who is responsible for visitor pressure, what specifically the pressures are and, as outlined in our response to questions 9 and 19, to take a positive and evidence based approach to tackling the pressures that exist.

Policy Direction 6 outlines the aspiration to provide high quality recreation opportunities, however, the preferred policy approach seems to focus on the management of recreation. We fully agree with the need for management and for the need to trial new approaches to management but would like the plan to be more positive in its preferred policy approach to recreation.

We have commented above on the value of promoting the recreation resource in the park, in addition we would be keen for the park to consider the following areas as positive approaches to recreation in the park;

- the need for a firm evidence base and understanding of impacts from recreation on the natural heritage. A programme of research is perhaps needed to address some key areas;
- an understanding of who the visitors are that come to the park. It is important that visitors are not treated as an amorphous group and to properly understand the different sectors that visit the park and what their differing characteristics and needs are and the potential challenges they present. To this end, the park should be aware of the household targeting tool – <http://www.sportscotland.org.uk/ChannelNavigation/Topics/TopicNavigation/Active+Scotland+Targeting+Tool/Active+Scotland+Targeting+Tool.htm> which has the potential to be used to identify different participant groups in the park, what their characteristics are, how to communicate with them, and barriers they face to participation in sport. **sportscotland** would be happy to discuss the targeting tool and its application with the National Park;

- an understanding of what is available where for outdoor sport and recreation as a basis for promotion work;
- Policy Direction 6 refers to the desire to enhance the range and quality of recreation provision. **sportscotland** fully supports this approach and would like to see reference made to this in the preferred policy approach. On this issue we consider it important to look at what the gaps in provision might be across a range of outdoor sport provision. Is there a need for mountain bike provision, or changing facilities at particular sites or for key car parks perhaps? Some sort of auditing work and demand assessment would be useful in this area. The park should be aware of our sports facility fund <http://www.sportscotland.org.uk/ChannelNavigation/Topics/TopicNavigation/Facilities/Funding/The+Sports+Facilities+Fund/Sports+Facilities+Fund+Application+pack.htm> which may be able to support some sport facility needs in the park, including for outdoor sport and recreation.
- **sportscotland** considers that the National Park could usefully join up with the work of its constituent Local Authorities on sport development. This could extend to a range of activity that would promote enjoyment of the park and be of mutual benefit to both the park and to its local authorities. Opportunities to better join up exist in;
 - the development of sport development strategies, with specific proposals on outdoor sport;
 - the development of sport facility strategies. Outdoor sport is not currently considered in sport facility strategies but is an area that could be thought about and trialled within the national park (links to first bullet on gaps in provision). **sportscotland** have done some thinking in this area that we would be happy to share with the National Park.
 - Community Sport Hubs are an initiative being promoted by **sportscotland** working with local authorities across Scotland. There is real potential as part of the Community Sport Hub initiative to join up with and provide for outdoor and adventure sports. **sportscotland** is currently working with Highland Council on the development of a Community Sport Hub in Aviemore. Early thinking is clear on the opportunity to join up with outdoor and adventure sport potential in the area.
 - Active Schools provides an opportunity to engage young people in activity in the outdoors.

sportscotland would be happy to work with the park to see how it could engage more closely on a sport development agenda.

Question 28 – Policy Direction 8 – sustainable patterns of growth

In relation to the policy approach to improvements to the A9 it will be important to ensure opportunities for walking and cycling provision are considered and to ensure that important access routes are not impeded by any improvement works.

sportscotland would be happy to meet with the park to discuss our response and to look at options for joint working in delivering some of the workload discussed above.

Thank you.

Campbell Gerrard

Planning Team

25.11.11

Consultation on the Draft Cairngorms National Park Plan 2012 – 2017

Response from The Cairngorms Campaign and The Scottish Wild Land Group

The Cairngorms Campaign and The Scottish Wild Land Group welcome the opportunity to comment on the Draft Cairngorms National Park 2012 – 2017. The Cairngorms Campaign is a Scottish Registered Charity, number SCO5523, with objects to promote public appreciation of, and care for, the character, beauty and ecology of the Cairngorms area, and to encourage all concerned to foster or participate in active conservation of the Cairngorms area. The Scottish Wild Land Group is a Scottish Registered Charity, number SC004014, which aims to protect and preserve Scotland's wild land.

General

Whilst there are proposals within the draft National Park Plan that we can support, the overall impression of the draft NPP is that it is the product of an organisation reluctant to address many of the problems of the Cairngorms area, unable to face the inevitable contradictions within its policies that this lack of grounding in reality produces, and with an agenda that is at odds with its primary responsibility towards the conservation and enhancement of the natural and cultural heritage.

There does not appear to be adequate recognition or understanding of the very real challenges facing the national park, nor any attempt to provide the radical solutions that would begin to address them. Instead we are presented with a vision of what might be described as DisneyPark, where jolly mountain folk and forest folk thrive sustainably together, amidst a rapidly expanding (yet sustainable) human population, living in sustainable and landscape enhancing housing estates, amongst ever growing sustainable businesses and sustainable wealth creation and sustainable tourist developments, all amidst a wonderful thriving nature of enhanced landscapes and enhanced wildness and enhanced biodiversity.

It is a 'have your cake and eat it' vision, with little recognition or analysis of the limits of growth, or the carrying capacity of land. It is reminiscent, in its relentless optimism and separation from reality, of the 'end to boom and bust' economics that preceded the recent economic crash. There, also, people were assured of a rosy future, but the reality was an economy based on make-believe in which the only real winners were a tiny minority of the already wealthy, whilst the rest of the economy lies in ruins. What price the prediction that the only substantial winners from the direction the CNPA is pursuing will be the large

landowners, land speculators and large building companies, whilst landscape and biodiversity will experience further attrition and loss, and the settlements in which local people live will suffer further unsympathetic expansion and erosion of their setting and character?

The impression is given that difficult issues, where conflicting interests collide, are being ignored, and the history of past decisions that have had profound and frequently damaging impacts on the Cairngorms area are being quietly forgotten by the CNPA, if they were ever even known. It is perhaps worth repeating the aphorism: those who forget their history may be condemned to repeat it.

Against this background lies the unanswered question, “Why is a new National Park Plan now considered necessary?” The Cairngorms Campaign is not aware of any statutory requirement for a new NPP at this time, and no justification for producing a new NPP is provided within the present draft NPP.

The draft NPP claims that it “builds on the current National Park Plan 2007-2012”. The Cairngorms Campaign regards that statement as mendacious:

Firstly, the title of the previous NPP was not “National Park Plan 2007-2012” as stated in the draft NPP. This gives the erroneous impression that it was only required to last until 2012. Its title was “Cairngorms National Park Plan 2007”, giving the date of adoption, not the range of time for which it was to operate. It also, of course, contained outcomes to the year 2030, clearly indicating that it looked far further ahead than 2012. As the Park Plan 2007 included Priorities for Action for 2007 – 2012 and a series of desired five year outcomes, a review and update of these is necessary, but we question whether a wholesale revision and reassessment of objectives is necessary, particularly as these appear to significantly dilute the strength, and reduce the detail, of the Park Plan 2007.

Secondly, the draft NPP manifestly does not “build upon” the NPP 2007: it demolishes much of value in that plan and proposes replacing it with briefer, more general, less precise, statements that would be of less value in guiding proposals and developments precisely because of that brevity and greater generality.

The overwhelming assessment is that the draft NPP represents a dumbed-down NPP. One that is:

Firstly, less likely to cause the pertinent observations made by the Reporters to the 2009 Local Plan Inquiry concerning the primacy of the NPP and the unfavourable light that that threw upon many of the allocations within the National Park Local Plan, and

Secondly, far less able to hinder damaging developments proposed within the new Development Plan or elsewhere.

An Camas Mòr

Overall, we are most surprised that the draft Park Plan makes no mention of such a major proposed development as An Camas Mòr until page 80, and then with no introduction or explanation to inform the casual reader that “the new community” is actually an entire New Town to be located in the heart of the National Park. No other National Park in the UK has ever proposed such a development, and such would be unthinkable in most of the National Parks abroad. One would therefore expect that the CNPA would include something like “make progress towards the construction of An Camas Mòr” within at least one of its long list of desirable five year Outcomes, but No.

A diligent reader of the entire draft Plan would find another mention of An Camas Mòr within an apparent wish-list of developments said to be desired by the inhabitants of Aviemore (p 91), although the wording “The community too must remain ambitious...” implies that this ambition is being imputed to, or foisted upon, the inhabitants rather than arising spontaneously from them.

This wish-list reads as follows:

a state of the art indoor sports centre,
the new community primary school,
the riverside park,
the new Tesco, and
the An Camas Mòr housing development

We believe that to conflate an entire New Town of 1,500 houses, together with all its inevitable associated ancillary buildings and constructions, with other developments which each amount to no more than a single individual building is, at best, misleading.

This proposed development threatens the credibility of the entire Scottish National Park system for many years, and invites ridicule from the rest of Scotland, the rest of the UK and abroad.

Members of the public have reacted with astonishment, incredulity, and with varying degrees of indignation or outrage that the CNPA is proposing the construction of a New Town in the middle of the National Park, and have contributed with great generosity to an Appeal for funds to finance a legal challenge to try to overturn the CNPA policy on certain of its housing developments as set out in the CNPLP.

We believe that the CNPA should take note, rethink and reverse its housing policies.

National Park Principles

We note the several long-term principles set out on page 10 of the Draft Park Plan, and fully agree with the first sentence of these, that “The conservation and enhancement of the

environment is central to National Parks”. This statement must define all thinking in the Park Plan, and recognition of the National interest requires a wider focus than purely those local communities and businesses located within its boundaries. The National Park Plan must have at least a National brief, and consider the National interest – all of Scotland’s people, more than solely visitors and local communities, both present and future generations.

It is worth remembering that the population of Scotland is some 6 million – the National part of National Park – whilst the population with the good fortune to be living within the National Park is around 17,000, just over one-quarter of one per cent.

Indeed, the Scottish National Parks are part of a wider international community of Protected Areas, and should constantly strive to be among the very best of these, learning from their experience and contributing to knowledge of the very best practices of land management and wildlife conservation.

We believe that the Cairngorms area was designated as a National Park because of its unique combination of landscape and wildlife habitats, both of which face many threats, including climate change and inappropriate developments, and that the principal responsibility of the Cairngorms National Park Authority (CNPA) is to conserve and enhance the Cairngorms environment for the benefit of present and future generations.

Accordingly, we believe that a precautionary principle is fundamental. *“First, do no harm”* should be uppermost in the considerations of those responsible for such a precious area. Damage to wildness and fragile natural environments is easily incurred and is frequently irreversible - or, at best, extremely expensive and slow to undo. Illustrations of this are shown by the cost and efforts to repair past damage which has led to (near-) extinction of rare species and reduction of woodlands and wildness caused by overgrazing, uncontrolled hill-tracks, and inappropriate developments.

For this reason, we believe that great care should be exercised in regarding National Parks as “a real opportunity to trial new approaches beyond business as usual”. Such a generality may include real risks and threats with unforeseen disadvantages, and we urge the CNPA always to adopt the precautionary principle where there is a risk to the scenery or wildlife.

An additional National Park principle should be *“To draw on, and benefit from, what has been learned elsewhere in sustainable tourism development, mountain management and the management of protected areas”*. There is wide, and long term, experience available from other mountain areas, eg The Alps, New Zealand, Canada and the USA, as well as in England and Wales, and we believe that the CNPA could learn much from studying the failures and successes experienced elsewhere. At the least, this should enable the CNPA to avoid repeating the worst mistakes made elsewhere, such as the horrors of over-development seen in some areas of the French Alps – mistakes which the CNPA at present seem close to making with the development of wholly inappropriate massive hotel developments and excessive commuter-style or second home housing estates.

Similarly, with reference to the principles of tourism and visitor management, we emphasise the need for genuinely “sustainable” approaches to visitor management, where “sustainable” means that the approach can be maintained for year after year without irrevocably damaging, or withdrawing resources from, the area – whether these are environmental resources which may be damaged by inappropriate visitor management, or financial resources withdrawn to distant investors. **The Sandford Principle** - that where public enjoyment (and even more so, economic development) is in irreconcilable conflict with the preservation of natural beauty in a National Park, then conservation of natural beauty must come first – must be followed at all times.

The CNPA must recognise that “Parks for All” does not, and cannot, mean “Parks for Everything”. Choices have to be made, and the priority of conservation and enhancement must prevail. Sustainable tourism must be one of the principles, but this does not simply equate to good visitor management. Whether tourism is sustainable depends primarily upon the scale and form of development that is undertaken, as is demonstrated clearly by the international experience and detailed research. These clearly show the advantages of local ownership and “soft tourism” over the “hard tourism” which is at present dominant in Aviemore.

The Geographical Context

Section 2 of the Draft Park Plan sets out many of the special landscape qualities of the Cairngorms, as well as the regional context of the area in relation to the surrounding regions and cities, and the rest of Scotland. It states (p 13) that “Management of the National Park needs to .. make the most of the Park as an asset for these regions and Scotland as a whole.” We find this phrase, “make the most of” unfortunately vague, and urge the Plan to express its intentions more clearly. “Make the most of” is such an imprecise phrase that whilst it could refer to the exceptional landscape qualities of the Cairngorms, and the opportunity for the inhabitants of the rest of Scotland to enjoy and appreciate them, it could also refer to the availability of attractive building sites and “making the most of these” by using them as the locations for the development of dormitory commuter suburbs of Inverness, or large estates of holiday homes for the benefit of those from further afield. We trust that the CNPA has in mind a meaning closer to our first illustration, but believe any such ambiguity should be eliminated by tighter wording.

Questions.

Question 1

What makes the National Park Special to you?

The Cairngorms Campaign publication “The Cairngorms – Stepping Forward” 1997 states in this regard:

“Many books celebrate in prose and pictures the landscape and wildlife of the Cairngorms, one of the supreme natural areas of Western Europe. The high tops are frequently given special emphasis, but cannot be seen in isolation. The beauty of the hills is perhaps best seen reflected in a loch surrounded by native woodland, with wildlife forming a continuum that runs from the rivers to the high tops . Any management proposals for the Cairngorms Area must recognise this diversity and take account of the entire ecological and cultural unit.”

“The Area is of such outstanding national and international value for nature conservation that even an incomplete catalogue gives a strong sense of this natural wealth:

- one of the most important areas for mountain wildlife in the European Union;
- a concentration of glacial and post-glacial landforms;
- the home for many scarce plants, insects, birds and mammals with Arctic or northern distributions such as twinflower, capercaillie, dotterel and mountain hare;
- heartland of the remaining Caledonian woods – outliers of the boreal forest, which are national monuments as important as any cathedral;
- the bed for some of the least polluted rivers in Britain, including the world-famous Spey and Dee;
- breeding ground for uncommon wading birds and birds of prey, many of which are now rare in the UK
- in the fertile straths and extensive moorlands, a land worked by generations of farmers and crofters, stalkers and gamekeepers”

“It is also one of the finest landscapes in Europe, comprising the largest mass of high and wild land in the United Kingdom and including five summits above 4000 feet. The rolling granite plateaux are broken by deep glaciated glens and impressive corries which shelter high lochans. The feeling of remoteness and the expansive views are enjoyed by many hill users. In contrast to the wilderness of the plateaux, there are vast tracts of heather moorland and some of the most extensive remnants of old Caledonian pine woods. Birch woodland, marshes, meandering rivers, and remote glens all add to the diversity of scenery and wild land experience, while a range of historical and archaeological remains record the cultural history of this landscape. Farming in the more fertile straths, harvesting of the timber, and management of the heaths and woods have helped to shape the landscape, and all will play a significant role in its future.

“All these features are integral parts of the Area and they have long been recognised as attractions not just to local people but also to visitors from the rest of this country and from all over the world - international assets of immense value. The diversity is one of the main appeals of the Area: the hill walker may be a knowledgeable botanist, and the rock climber a keen downhill skier, but most recognise the fundamental spiritual value of the superb landscape in which they take their recreation.”

These qualities are what make the Cairngorms special.

Question 2

Do you agree with these descriptions of the special qualities?

No.

The CC sees no reason, and none is given within the draft NPP, to replace the fairly detailed descriptions given in the NPP 2007 (pp. 25-27), which at least attempted to describe in some depth a range of special qualities, albeit incompletely (it failed, for example, to mention birch and juniper woodlands) with the brief outlines given in the draft NPP. It is, of course, the case that the briefer and more general the description of a quality is, the easier it is to ignore it and the more difficult it is to point out that a proposal may damage it.

The special qualities in the draft NPP also contain the following statement, “*Part of what makes the Cairngorms National Park special is that it is a National Park with people living and working in it.*”

That is, at best, vacuous, and anyway demonstrably untrue. Every single other national park in the UK contains people living and working in it, as does every single other part of the UK of similar size to the CNP, (including all potential future national parks). In what way does the fact that the CNP has people living and working in it make it special? The answer, of course, is that it doesn't.

That is not to say that the presence of people living and working in the CNP is not an important issue – it obviously is. But it does not make the CNP special. If the CNPA wishes to draw attention to the obvious, but not special, fact that the CNP is populated it might be better to refer instead to “important and special qualities”.

It is also the case that referring to the residents of the CNP as “special” may be construed as an insult to rural populations elsewhere in Scotland, who each have their distinctive identity and are just as “special” as those of the CNP. Indeed, in as much as these other populations have not experienced the high rate of in-migration from elsewhere in the UK as has the CNP, their present populations can be said to more fairly represent the indigenous people of their areas. It is inconsistent for the CNPA, charged with conserving the cultural heritage of the CNP, to promote rapid population growth that can only be accommodated by in-migration from elsewhere: that process dilutes the indigenous culture and is in danger of overwhelming it.

Further, the description “the harmony of complicated curves” as one of the “special landscape qualities” sounds like the kind of flowery language an estate agent might use to obfuscate the description of a house, and much the same can be said of many of the descriptions in Table 2.1. This is serious issue. The CNPA is charged by law with conserving and enhancing the natural heritage of the area, of which the special qualities are **the** fundamental expression. Yet the CNPA's descriptions of these special qualities provide little of any substance whereby they can be adequately recognised and protected. Table 2.1 and the accompanying text should not read like an exercise in poetic phraseology, but should be a tool whereby the special qualities are **adequately and precisely described**, so that their condition might be properly **recognised and monitored, and thereby protected and enhanced**.

Key Theme 1 starts: “The huge granite mountains of the Cairngorms National Park are unique.” Of course they are – what mountain isn’t unique? And, of course they have influenced the landscapes and heritage around them – which mountains have no effect on the landscape or local heritage?

Key Theme 3 talks of different areas sharing “deep connections to the same environments”, and the Park of being a place of “Mountain folk” and “Forest folk”. In view of the history of the last 200 years of the area, we challenge the first, and believe the second comment is misguided. Almost all of the population lives in the straths, and most of the forest is long gone. Which of the two descriptions does the CNPA consider fits better the fast food server in Aviemore, the shopworker in Tomintoul, the office worker in Grantown or the hairdresser in Ballater?

The entire section on special qualities in the draft NPP (pp.13-15) represents a dereliction of responsibility by the CNPA towards the special qualities of the national park. It is completely unacceptable, and should be re-written, based on the special qualities section of the NPP 2007.

Question 3

Are there other special qualities you think should be explicitly identified in the National Park Plan?

The CNPA should do what it claims to have, but has not, done: build on the work of the NPP 2007. That would mean using the descriptions of the special qualities given in NPP 2007, but with some additions and revisions to provide **more precise, comprehensive and authoritative descriptions**. The Cairngorms Campaign remains willing to assist with that procedure, but sees little merit in adding to the profoundly inadequate phrases provided within the draft NPP.

Question 4

Do you think the long-term outcomes should be updated and condensed? If so, how?

No.

There should be no reduction in the number of outcomes though some revision is appropriate, which again should look towards providing **more precise, comprehensive and authoritative information and guidance**. The Cairngorms Campaign is opposed to any proposal to condense the long-term outcomes, since this would involve the loss of information and would be more likely to allow attrition of the special qualities of the park that the CNPA are charged with conserving and enhancing. As a specific example of the problem “Extensive tracts of natural vegetation” and “Association with iconic animals” (in table 2.1) hardly comprise adequate descriptions of the specific species of plants, fungi and animals, including invertebrates, which must be conserved.

Further, we note that the proposed development of An Camas Mòr (which, of course, was never mentioned in the Park Plan 2007) is wholly incompatible with the desired long term outcomes of that first Park Plan: No 6 – “new buildings will complement or enhance their setting, including the settlement pattern and character” is hardly compatible with an entire New Town in the context of a National Park, and No 14 – “..dependence on private car use will have reduced..” is also quite impossible with a New Town apparently built for, and inevitably occupied by, many commuters into Inverness. The closest new five year outcome appears to be “people will make more use of public transport” (p 48) which is a lesser target.

Notably missing from the list of Challenges which the CNPA will face to 2017 (p 22) are:

- the destruction of wildlife such as mountain hares and other problems arising from the intensification of grouse moor management
- The threats from bio-invasion of dominant non-native species including mink, giant hog-weed on the Don, sika deer and invasive aquatic weed on the Spey.
- The importance of creating sustainable patterns of tourism, and
- The challenges of emergent land-uses arising from climate change and emerging government strategies on sustainability.

Question 5

Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

There are some issues of importance in the list.

The Cairngorms Campaign would add:

“The Park’s communities will be more able to look to the future without concern about the unsympathetic cramming and expansion of their settlements and the erosion of their character and setting.”

The importance of this outcome is evidenced by numerous statements set out in the Community visions in Appendix 4 to the Draft Park Plan – eg

“..quality and affordable housing .. will be supported. This should be done using existing real estate and redevelopment where possible, to avoid harm to the visual and natural environment.” (Ballater, p 92),

“Residents are keen to hold on to the community’s strong identity which they feel could be at risk if the village grew much larger through the granting of inappropriate levels of housing development. ...the fear of becoming ‘suburban’ ...residents are looking for sympathetic design on a small scale..” (Carr-Bridge, p 97),

“..residents are however increasingly disturbed and frustrated about what they perceive as the allowing of ‘over development’ particularly with regard to the impact a proposed new housing development will have on the community.” (Kingussie, p 109)

“Nethy Bridge’s concern for the future lies in what it sees as the risk of unsympathetic housing developments in scale and design.” (Nethy Bridge, p 111), and

“Residents, the Newtonmore & Vicinity Community Council and the Newtonmore Business Association are united in their recognition that over development of the built environment .. will impact negatively on the community’s ability to encourage visitors to remain in the village.. The proposed ‘estate’ type block developments are out of character and will, ultimately, undermine the attractiveness and appeal of Newtonmore” (Newtonmore, p 113).

Question 6

Which are the most important outcomes to you?

The Cairngorms Campaign is mainly concerned with matters associated with the natural and cultural heritage and with responsible recreation and understanding. It considers the most urgent attention needs to be given to outcomes **2, 3, 4 and 7**, concerning the quality and connectivity of habitats, the conservation of important species, the qualities of wildness and the quality, location and size of new built development respectively.

Question 7 (Outcome 1)

A Do you agree that five-year outcome 1 is an appropriate one for this National Park Plan to 2017?

Enjoying, conserving, enhancing and learning about the CNP, “enriching the experience”, is an appropriate outcome, but this outcome should be reworded to ensure that it does not simply imply that more people are to be encouraged to visit the park. Whether that is an appropriate outcome is an entirely separate consideration and should not be confused with this outcome.

The Cairngorms Campaign supports voluntary activities to conserve and enhance the CNP.

As well as encouraging responsible access, consideration needs to be given to land management techniques (eg closing or redirecting paths) to the same end.

Improvement of marketing and promotional material should concentrate on quality rather than quantity.

Organisation/promotion of a series of educative talks/ films about the Cairngorms etc. is supported by the Cairngorms Campaign.

Question 8 (Outcome 2)

A Do you agree that five-year outcome 2 is an appropriate one for this National Park Plan to 2017?

Yes, the Cairngorms Campaign supports this outcome. Species-rich grasslands (with reference to plants, fungi and/or invertebrates) are also important, and should not be overlooked by a focus solely on woodlands and wetlands.

There should be a presumption in favour of establishment of local provenance native woodlands by natural regeneration without the use of fencing.

Part of what is needed towards delivering this outcome is the clear identification by the CNPA of existing woodlands within the Ancient Woodland Inventory and a complete halt to any further loss of such irreplaceable habitats. This process should also identify “plantations on ancient woodland sites” (PAWS) and ensure that an urgent programme of restoration to full native quality by the most ecologically appropriate techniques is delivered.

E Do you agree with the indicators and targets suggested for this outcome?

No. Simply measuring the overall increase in area of woodland (if found) would give no indication of qualitative changes and no indication of – indeed would hide - losses of established woodlands.

Established woodlands should be monitored both for area and quality (absence/presence of exotic tree species, presence/absence of characteristic flora/fauna) separately, so that losses and qualitative changes can be monitored. The target should be 0% - no change, ie no loss at all.

Monitoring of any change from non-woodland to woodland should occur separately and involve recording of species involved and technique (planting/regeneration/ fencing/deer reduction) used

We believe that the CNPA should also set longer term targets, beyond 5 years, in order to emphasise the continuing and long term importance of this objective.

Further, we believe that delivery of the Cairngorms Deer Framework will be insufficient to resolve the problems caused by over-grazing by excessive and un-naturally high populations of deer, as demonstrated by evidence recently provided to the Mar Lodge review.

Question 9 (Outcome 3)

A Do you agree that five-year outcome 3 is an appropriate one for this National Park Plan to 2017?

Yes, the Cairngorms Campaign supports this outcome. It requires the detailed identification of the species to which it refers. The CNPA should be prepared to challenge strongly those land-owners whose policies, such as the intensification of grouse-moor management, are having such destructive effects on species such as mountain hares and moorland birds.

C Are there any better packages of work that would deliver the outcome?

Increased monitoring and recording for species to identify which species are present and what is their distribution. This is particularly important in sites that are threatened with development or other radical change.

Questions 10 (Outcome 4)

A Do you agree that five-year outcome 4 is an appropriate one for this National Park Plan to 2017?

Yes, the Cairngorms Campaign and the Scottish Wild Land Group strongly support this outcome.

However, the definition of wild land that appears to inform the map (p.68) may be unduly restrictive and appears to be mainly based on the distance from roads, and altitude. The CNPA should consider a broad definition of wild land, rather than the somewhat arbitrary outcome of a geographical information map-based exercise. There are many areas of low ground where lack of obvious human activity and presence of vegetation and landform not greatly or obviously modified by human actions could qualify as wild land. It is also important to similarly protect long-established landscapes that include a history of human influence, even though such landscapes could not be referred to as wild.

“Protecting the park from dramatic or incremental and cumulative changes” (p 36) is a particularly important outcome and examples of such changes include hill-track developments (including “upgrading” of previous old tracks), the long-term impact of deer fencing, forestry clear fells and re-structuring, and built developments.

However, it is regrettably the case that much of the most serious losses of wild land are as a direct result of actions, or lack of them, by the CNPA. Only very recently, the CNPA has welcomed the findings of the Mar Lodge review, which recommends resort to a shield fence several kilometres long on open wild land between Glens Lui and Dee to the west of the Linn of Dee. If that fence is built and performs its function it will not only represent an intrusion into the landscape in its own right, but also imprint a hard edge of woodland versus moorland

upon the land for decades into the future. Similarly, the built development of An Camas Mor, endorsed by the CNPA, would destroy what is presently a landscape of heath and regenerating native woodland of considerable appeal.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

No. There is a need for the CNPA to be more pro-active in encouraging or requiring the removal of hill tracks and other undesirable developments, as well as preventing them, or not granting them planning permission, in the first place. Specifically, it is insufficient that “Land managers will all follow best practice guidance on the design and maintenance of hill tracks” – this means “build hill tracks nicely” when the policy should be a very strong presumption against any more such tracks, with encouragement for the removal of many existing tracks.

Question 12 (Outcome 6)

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

No.

The information, such as it is, provided by the CNPA on the economic status of CNP residents (eg “many of the people are relatively worse off than people in other parts of Scotland” (p 42) – self-evidently true for almost anywhere, because it is so imprecise, but the intention is loosely apparent) appears at odds with the results of the 2001 census, some of which is shown in the following Table:

Results from 2001 Census (percentages)					
Category	Aviemore	Boat of Garten	Nethy Bridge	Highland	Scotland
Are economically active (16-74pop)	76.2	67.4	66.4	68.1	65.0
In good health	72.3	75.5	75.6	70.8	67.9
Have at least one car	70.4	89.1	82.3	74.9	65.8

This information, albeit awaiting updating from the 2011 census, indicates that in these settlements CNP residents generally enjoy more employment and are healthier and wealthier than in the rest of Scotland, and usually in the rest of Highland also. In addition to these

material comforts, CNP residents also enjoy the benefits of living in a relatively crime free and unpolluted environment of outstanding quality.

Against that background should be set the present economic circumstances, for example as outlined by the recent comment by Michael Saunders, UK economist at Citigroup:

“We expect the UK’s cumulative growth over 2008-16 will be similar to, or worse than, Japan’s lost decade and the UK’s worst recession/recovery cycle of the last 100 years (excluding effects of World War 1 and 2). And it may be even worse than we expect. There is no accepted definition of depression: but this may qualify”.

and endorsed by Bill Jameson, **“This is no ordinary cyclical recession but the onset of a new era. It will transform not only our own financial prospects but a political culture accustomed for decades to raising expectations and then meeting them by resort to ever more debt and borrowing.”**

http://www.scotsman.com/news/cartoon/bill_jamieson_small_window_of_opportunity_1_19_90790

In these circumstances, for the CNPA to promote an outcome that refers to the previous CNP economy as “fragile” and “with relatively low wage structures” and looks forward to an economy that will have grown substantially, appears not only unrealistic, but insensitive to the difficulties faced elsewhere in Scotland.

Instead, it seems more appropriate for the CNPA to explore and promote adoption of “transition town” status for its communities, where economies certainly diversify and rely upon the distinctive qualities of their environments, but where the dubious imposter of growth is assigned a far less exalted status.

Question 13 (Outcome 7)

A Do you agree that five-year outcome 7 is an appropriate one for this National Park Plan to 2017?

Yes, although this Outcome must represent the most blatant example of the gulf between aspiration and reality that the CNPA’s management has produced to date. Indeed, this aspirational Outcome is overwhelmingly at odds with the CNPA’s performance in approving the largely luxury developments such those of Burnside, Aviemore or at Braes of Balnagowan, Nethy Bridge. It is, of course, the case that the allocations within the CNPA Local Plan 2010 for major housing developments on heathland and regenerating native woodland at An Camas Mòr, within pinewoods at Carrbridge, and ancient woodland at Nethy Bridge, amongst others, render this Outcome 7 completely unobtainable if they are progressed. The stark contrast between this Outcome and the actuality of what people are experiencing on the ground or know is in the pipeline simply brings the CNPA into disrepute: people know when they are being lied to.

Part of the sadness of this situation is that it has happened so often before: history is replete with examples of overdevelopment that has ruined once treasured landscapes of great value for their natural heritage. Yet the CNPA seems to think that it can do what's never been done, that it can win what's never been won: the impossible prize of marrying rapid and substantial developmental growth with adequate protection of the natural and cultural heritage. This hubris threatens to be the ruin of the Cairngorms National Park.

We strongly believe that the CNPA approach to housing development is deeply flawed, and that the CNPA should withdraw its existing policy and rethink, rejecting all large housing developments in the Park.

To take just one example: <http://www.physorg.com/news180713261.html> , see below:

“Housing growth near national parks may limit conservation value

December 22, 2009

The growth of housing near national parks, national forests and wilderness areas within the United States may limit the conservation value that these protected areas were designed to create in the first place, a new study has found.

The researchers determined that housing development reduces the potential of these protected areas to serve as a modern-day "Noah's Ark," interrupting potential travel corridors for some animals, and altering habitat for others.

Results of the study are being published this week in *Proceedings of the National Academy of Sciences*.

"These protected areas have become an amenity that actually attracts housing development," said Roger Hammer, an Oregon State University sociologist and one of the co-authors of the PNAS study. "Housing is a convenient gauge because it is something that is easily measured and can be traced back to the 1940s. In essence, it serves as a proxy for human development impacts that include everything from roads to strip malls."

In their study, the research team looked at how the growth of housing adjacent to protected areas has created a patchwork quilt of land use that essentially has shrunk the impact of the conservation areas. The researchers did not look at potential impacts on individual species, but rather focused their study on how the housing growth has changed the landscape.

Between 1940 and 2000, 28 million housing units were built within 50 kilometers of protected areas in the United States. During the last three decades, the rate of housing growth near these areas has accelerated at the rate of about 20 percent a decade.

In fact, since the 1990s the growth of housing within a single kilometer of protected areas has far outpaced the national average of new housing units, according to Hammer, a demographer in OSU's College of Liberal Arts.

"The real growth began in the 1970s with a 'back to the land' movement, when proximity to the workplace became less important in determining housing location than living in a rural

area," Hammer said. "That was the first time that growth in metropolitan areas was outpaced by growth in more rural areas in this country."

Hammer and his colleagues say that if long-term housing trends continue on the same trajectory, another 17 million housing units will be constructed within 50 kilometers of protected areas by the year 2030. The situation actually could worsen, the researchers acknowledge, because baby boomers are just beginning to hit retirement age - and that could affect housing in rural areas.

"Housing issues will not go away," Hammer said. "The largest cohort of baby boomers was born in the mid-1950s and they're just beginning to hit Social Security age. Retirement has been a key factor in the increase of housing near protected areas - and that probably won't change."

Hammer and his colleagues say that the growth of housing near these protected areas includes both full-time and part-time, or vacation, dwellings.

"The growth of seasonal homes has been a driving factor in the proliferation of housing units built near protected areas," Hammer pointed out. "But from a research standpoint, it's difficult to gauge a difference between a so-called permanent home and a second dwelling. A seasonal home may be actually be used on a year-round basis and a lot of dwellings that begin as vacation homes may become permanent residences when the owners retire."

Question 14 (Outcome 8)

A Do you agree that five-year outcome 8 is an appropriate one for this National Park Plan to 2017?

Yes.

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

They will make some contribution, but they completely ignore (other than minimising carbon loss) what is probably the greatest contribution that the CNP can make to this problem: that of carbon sequestration.

C Are there any better packages of work that would deliver the outcome?

The CNP is particularly well placed to contribute to carbon sequestration, yet this is almost ignored by the CNPA. The CNP, almost certainly, can make a very much greater contribution per capita by carbon sequestration than the measures outlined within Outcome 8. These latter, since they will be applied to the relatively small population of the CNP will, even if successful, make a not much greater contribution than similar measures applied to an urban

situation. Of the ten bullet points outlining “What’s needed to deliver this outcome?” eight or nine are equally applicable to urban situations.

The carbon sequestration measures for which the CNP is particularly well suited relate to land management changes. Scottish Natural Heritage estimate that if all of Scotland's peatlands were undamaged, they would store about 40 per cent of the carbon emitted by generation of our domestic electricity, and that our peat soils at present contain nearly a third as much carbon as that held by all of Europe's forests.

However, the predominant land-use within much of the CNP is for sport shooting. This requires large numbers of red deer or burning of heather for grouse, both of which minimise the carbon storage ability of the land. Moving away from this land-use would allow degraded soils, denuded ground vegetation and absent woodlands to recover their carbon sequestering potential, whilst providing other environmental benefits in terms of biodiversity, landscape, river quality and flood control.

Yet this benefit isn’t even addressed by the CNPA, and indeed just this week the CNPA announces that it, “welcomes publication of the independent [Mar Lodge estate] review and we look forward to working with NTS to take forward its recommendations.” If those recommendations are taken forward, then deer number will remain higher than they would otherwise be and the carbon sequestering potential of Mar Lodge (and perhaps other) estate(s) will be diminished. The CNPA’s support for the sporting interests over Mar Lodge is indicative of its failure to champion both natural heritage and carbon sequestration issues there and is an unacceptable position for a national park authority to adopt.

This example illustrates the lack of joined-up thinking of the CNPA. The CNPA correctly identifies carbon emissions reduction as an important issue but then fails to identify the measures that likely have the overwhelming potential to address this problem. This is so, even though other large estates, notably Glen Feshie and Abernethy, are courageously already well on the way to tackling this problem, albeit incidentally to their main objectives.

Question 19

Do you agree with the opportunities and threats identified? If not, why?

Under Farmlands, the Weaknesses should include: Rising energy costs, and also the increasing shortage of certain key farming skills such as those of skilled shepherds (also referred to under Threats). Other Threats include the ageing population of certain sectors, including hill farmers, and the lack of new entrants to those sectors.

Under Forestry, a Weakness is the artificially high level of deer population which prevents natural regeneration. Although this is briefly referred to under Threats, “inappropriate grazing by stock or wild mammals”, more specific reference should be made to the excessive number of deer which, of itself, prevents regeneration – high deer numbers inevitably imply wholly destructive, and therefore grossly inappropriate, grazing which eliminates variety and wholly prevents (not merely reduces) any regeneration.

Under Rivers, lochs, wetlands and floodplains, Strengths include the diversity and high conservation value of water bodies from major catchments to high altitude lochs, and the extensive wetlands.

Under Mountains, moor and heathland, Weaknesses should include the instability of land-ownership, which can produce rapid changes of policy, and also the increasing persecution of wildlife deemed unhelpful to the particular sporting interest of certain land-owners.

Opportunities mentioned include the need for alternative income sources for the ski industry in case of climate change, but there is no mention, as there should be, of the Weakness from the financial unviability of the Funicular, which loses money and is completely unsustainable without major on-going support from HIE. There is also the inevitable looming Threat (which is really an Opportunity for the mountains) of the need to decommission the Funicular at some point in the future when the economics become unsustainable or it is no longer possible to keep it running safely, and to restore the route of the Funicular which has been entombed in concrete.

Policy Direction 1 Enhance the special landscape qualities

Question 21

A Do you agree with the proposed approach?

Yes in broad terms. However we have very serious misgivings about the CNPA's assessment of landscape, for example in relation to An Camas Mòr, because of the CNPA's apparent view that an entire New Town will provide better landscape qualities than lowland heath, native pinewood, or grassland.

B Would you suggest a different or additional policy approach?

1. We recommend in paragraph 1 that the sentence:
“Conserving and enhancing these qualities needs work on **a big scale**, on the scale of the landscape itself.”
be changed to
“Conserving and enhancing these qualities needs work on **a range of scales from the smallest to the very large.**”
The qualities that make up the landscape exist on a whole range of scales, including small scale; qualities at all these scales need to be conserved and enhanced.
2. Policy approach 2: “Wildness in the CNP (see map on the following page) can be interpreted as a result of a matrix of natural and cultural qualities.” We are not clear what the CNPA means by “It could be considered as an effective proxy for a range of individual qualities at a landscape scale”. For example, to some people open moorland can be wilder than a woodland, whereas others may feel the opposite. Therefore we are unclear how wildness may act as a proxy for landscape qualities. This is an important issue to be clarified.

3. Map of Wildness Qualities. We recommend that a larger version of the map should be provided in order to make it more informative and clearer. We also have considerable misgivings concerning the sensitivity of the map in identifying wild land correctly or objectively. Such maps are produced from a weighted accumulation of different geographical qualities, in which the particular qualities, and the weights applied to them, are very much a matter of choice or personal judgement. It may be more helpful to consider a range of such maps, which can be produced readily, using different qualities and relative weightings.
4. We recommend that the CNPA provides information on the criteria it used to assess high to low wildness qualities to enable people to better interpret the map. For example it seems anomalous that areas in moderately remote locations and areas immediately around settlements are both classed as low wildness quality.

Policy Direction 2 Enhance biodiversity

Question 22

A Do you agree with the proposed approach?

Yes, we welcome this policy direction.

B Would you suggest a different or additional policy approach?

We recommend in paragraph 1 that the sentence “The National Park **can** also play a significant part in working towards Scotland’s 2020 biodiversity targets” be changed to “The National Park **will** also play .. etc”. This would more accurately reflect the CNP’s outstandingly rich biodiversity and the CNPA’s requirement to enhance the natural heritage.

We recommend that the LBAP should be reviewed in advance of drawing up the CNPP and CNPLDP to allow for delivery of the LBAP to be incorporated into these two plans.

We note that the 4th policy approach may require conservation action at short, medium and long timescales (e.g. for capercaillie); we recommend that this is clearly stated.

Policy Direction 3 Expand and enhance woodland

Question 23

A Do you agree with the proposed approach?

The proposed approach is so vague that it is impossible to make an informed judgement. It refers solely to increasing the area of woodland cover, targeted upon linking existing woodland.

The lack of deep analysis and unwillingness to face difficult issues where conflicting interests are exposed, as referred to earlier in our response, may be illustrated with reference to this issue of woodlands. Here, the following may be noted:

- There is no recognition of the status of ancient woodlands and the plants and animals associated with them, perhaps because the CNPA persists in allocating such woodland for housing and industrial development.
- There is no discussion of the need to change (ie increase) the ratio of native to exotic species.
- There is no acknowledgement of the invasive nature of some exotic tree species.
- Native woodlands are referred to as “productive”, ie. there is little recognition of the intrinsic values of native woodlands and the need for non-intervention and non-extraction zones within woodlands.
- There is discussion of the need for woodland expansion, but no guidance on the species involved or the techniques to be employed to encourage expansion, whether by intrusive methods involving fencing and ploughing, or by natural regeneration on open unploughed land.
- There is no mention of the value of soils, other than carbon-rich soils, that are the foundation of woodlands.

Thus, this Policy could be interpreted to mean expansion of exotic commercial conifer plantations established by planting on ploughed ancient soils behind deer fences – perhaps in geometrical blocks. We would be strongly opposed to such a Policy.

Similarly, although the Policy refers to “enhancing” woodlands, there is no discussion at all of what that means for existing woodlands, or how it can be brought about. The CNPA should state what it means by enhancement of existing woods, to include removal of exotics from plantations on ancient woodland sites, reducing (or in some cases increasing) grazing pressure, removal of invasive exotic plants and animals (including invasive tree species), establishing non-interference and no-take zones, management of human visitor pressure (particularly to reduce disturbance to sensitive species).

We would support the expansion of local provenance native woodlands predominantly by natural regeneration on unploughed soils (though with recognition that planting and fencing might be appropriate in some cases).

We would support the enhancement and protection of existing woods by the methods outlined above and, where appropriate, restructuring to enhance landscape, amenity and nature conservation interests.

This Policy needs to be completely re-written so as to make clear to what it refers.

Policy Direction 4 Enhance resilience of habitats and land use to climate change

Question 24

A Do you agree with the proposed approach?

Yes.

We would add that “Implications” for “Increasing biomass” also includes (by virtue of both increased biomass and increased porosity of soils) reduction of both rate and amount of run-off from land, thus reducing flood peaks and contributing to less extreme flows and better river quality. Such positive results are strongly to be supported.

Policy Direction 5 Contribute to a low carbon economy

Question 25

A Do you agree with the proposed approach?

Yes, in broad terms.

B Would you suggest a different or additional policy approach?

Please see comments under Question 14 on carbon sequestration that are directly relevant to this policy direction.

The CNPA should implement or commission research into the carbon sequestration potential of various types of land (wetlands, peatlands, woodlands, moorlands, etc) particularly to determine the carbon sequestration potential of land, currently under high grazing/burning pressure, should the regime be changed to one of low grazing/no burning, which allowed natural regeneration of woodland, increased ground biomass and increased carbon storage in soils.

Policy Direction 6 Provide high quality recreation opportunities

Question 26

A Do you agree with the proposed approach?

Yes in broad terms

B Would you suggest a different or additional policy approach?

We are concerned that the CNPA should not blindly seek to increase use of the CNP for recreation, regardless of environmental impacts (e.g. on habitats and species), impacts on other users, and loss or reduction in wildness qualities. The Sandford Principle for National Parks makes it abundantly clear that where the interests of recreation and conservation are in conflict, then conservation must prevail.

Policy Direction 7 Target proactive advice and public support to help land managers deliver multiple benefits

Question 27

A Do you agree with the proposed approach?

Only in some respects.

B Would you suggest a different or additional policy approach?

We are concerned at the open ended nature of Policy Approach 6 (“Investigate alternative ways to pay land managers for the value of the public benefits delivered.”). We are very concerned that such payments should not in any way be liable to the criticism of being a ‘gravy train’.

Policy Direction 8 Develop sustainable patterns of settlement growth, infrastructure and communications

Question 28

A Do you agree with the proposed approach?

No

B Would you suggest a different or additional policy approach?

We are very critical of the following statements, which appear to lack analytical rigour.

Paragraph 1 states “Achieving the vision for the National Park needs communities that are sustainable in economic, social and environmental terms.”

Considering the length of time that settlements have existed in the Park and the many changes that they have seen it is unjustified to suggest that they lack resilience and may not be sustainable in any respect in the future.

Paragraph 1 continues “It needs settlements that create a sense of place”.

We consider the housing developments decided on by the CNPA to date have failed to create a sense of place; they are indistinguishable from developments outwith the CNP, e.g. in parts of Inverness and Moray, and have contributed negatively to the built environment of the communities upon which they have been imposed. We therefore query what the CNPA is going to do so differently from 2012 onwards that is going to turn this proven poor track record around.

Paragraph 1 continues “It needs .. settlements where people want to live and work, and that encourage mixed and balanced communities.”

To suggest that the CNP does not already have settlements where people want to live and work is far-fetched. The CNP has some of the highest property prices in the country, and is a highly sought after place to live and work. The reference to mixed and balanced communities needs to take account of the age-related trends in the whole country, to avoid any special pleading, and note that Aviemore actually has a younger population than the average. There doesn't therefore appear any basis for suggesting that the CNP has substantially less mixed or

balanced communities than the average, as indicated by the following information from the 2001 census:

Percentage of population aged	Aviemore	Boat of Garten	Nethy Bridge	Highland	Scotland
0-4	5.9	5.1	5.1	5.4	5.5
5-14	12.6	12.6	9.6	12.9	12.4
15-24	11.1	6.3	7.6	10.6	12.5
25-44	32.4	27.1	22.0	27.4	29.2
45-64	26.5	29.5	30.8	27.1	24.5
65-74	6.8	12.7	13.5	9.3	8.8
75+	4.7	6.7	11.3	7.3	7.1

It is, of course, the case that the CNP does not possess large further education institutes and that therefore many persons in the 15-24 age bracket will be studying outwith the CNP during the census period, and not be included in the above figures.

We do not support Policy Approaches 1-3.

Policy approach 1 Implications

We disagree that growth should be supported in all communities and disagree that it is achievable to have growth that is incremental and reflects existing scale and patterns of development because of the various permissions already in the pipeline and allocations in CNPLDP. For the same reason we disagree that existing planning consents support this strategy – the scale and pattern of such consents cannot justifiably be said to be incremental and reflect existing development.

We are concerned that this demonstrates internal inconsistency within CNP Plans; inconsistency between the CNPA’s written statements and their planning decisions; and gives an impression that the CNPA says one thing and does another.

Policy approach 2 and Implications

Policy approach 2 states “Develop the new community of An Camas Mòr as the main focus for growth in Badenoch and Strathspey”.

We disagree that An Camas Mòr (ACM) should be the main focus of growth in Badenoch and Strathspey. Growth should be focussed in existing settlements, not in a New Town which is a wholly inappropriate development in a National Park. This proposed New Town conflicts with Park aims and contradicts many of the outcomes expressed in the 2007 and 2012 NPPs.

The Implications state “Focuses growth in the most sustainable way on a new community with good transport connectivity and the opportunity to plan and develop a functioning community.”

We disagree that ACM focuses growth in the most sustainable way. The location of ACM necessitates travel to access services that already exist in established communities. Initially ACM will have no or few services of its own, and it is an unknown how long this situation will persist. ACM requires sewage connections that could require energy-demanding pumping; ACM will impact directly and indirectly (through recreational impacts) on rare species and priority habitats to a greater extent than would be the case at some other locations; ACM requires the construction of a new road which will need to be maintained, treated in winter etc; at some other locations existing roads could be used.

We disagree that ACM would represent an example of notably good transport connectivity and consider that the proposed transport links are nothing exceptional. ACM has no railway; its proposed bus service to Aviemore may prove nothing more than what other communities enjoy and may attract no more use, bearing in mind that for all senior citizens bus travel can be free; its proposed non-vehicular path to Aviemore may prove no more popular than the equivalent route between Newtonmore and Kingussie. There is no reason to believe that people in ACM will use their cars any less than people living in Aviemore, and they may use them a good deal more because they live away from the services and transport connections that exist at Aviemore.

The Implications continue “Relieves pressure for development on other settlements in Badenoch and Strathspey with less capacity to accommodate development.”

We consider it is inconsistent to state that ACM would relieve pressure on other settlements. This is inconsistent with the CNPLDP which clarifies and justifies that housing for people in all settlements is appropriate so that they can live in their settlement of choice, and it is also inconsistent with the large housing developments promoted by the CNPA in these villages.

We do not consider there should be the level of growth in Badenoch & Strathspey that is proposed in ACM.

The CNPA must define what it means by sustainable. The high level of housing promoted by the CNPA is clearly unsustainable in terms of environmental impacts. It is notable that no analysis of carrying capacity has been undertaken by the CNPA and no indication of if, or when, that present unsustainable high level of growth will cease.

Such a high level of growth creates problems, distorting the local economy towards an economy based upon, and requiring, ever more development, which makes it more difficult to change the longer and more intensely it continues. The concentration on large developments also disadvantages small local building firms.

Policy Approach 4

“Support well planned improvements to the A9 road and main railway line ... Ensure effective planning of improvements to safeguard natural heritage while maximising the views and enjoyment for visitors to be had from these routes.”

We are concerned at predictable impacts on natural heritage of dualling the A9, (as recently announced) which will increase the barrier to wildlife movements and increase wildlife road mortality.

We note with concern that the CNPA has noticeably failed to achieve a ‘well planned improvement to the A9’ at Crubenmore, either in terms of access or wildlife. The CNPA will therefore need to raise its standard substantially if this Policy Approach is to prove realistic.

6 Delivery of the Cairngorms National Park Plan 2012-2017

We are concerned that the CNPA should show clear and strong leadership when working within partnerships and that the CNPA’s leadership demonstrates unequivocal commitment to safeguarding the natural heritage of the Park. For a Partnership to operate effectively requires a Senior Partner, and the CNPA should eagerly and actively fulfil this role, setting clear policies and boundaries determined by its responsibilities towards conservation and enhancement of the natural heritage.

The Cairngorms Campaign

The Scottish Wild Land Group

9 December 2011

8th December 2011

Cairngorms National Park Authority
Freepost NAT 21454
Grantown-on-Spey
PH26 3BR

Our Ref NM/1004943
Your Ref

Dear Sir / Madam

The Crown Estate Representation to Draft Cairngorms National Park Plan 2012-2017

Introduction

This representation is made on behalf of The Crown Estate. The Crown Estate is governed by The Crown Estate Act 1961 and its overall aims are to benefit the tax payer and enhance the value of its assets. Its overall core values of Commercialism, Integrity and Stewardship are applied to the management of all its interests including its estate at Glenlivet. The Crown Estate seeks to integrate into its management the key local stakeholders, which in this context are seen as being its tenants, the immediate community through the Community Council, and the wider community through the Local Authority.

The representation relates specifically to The Crown Estate's Glenlivet Estate. This estate extends to some 14,500 hectares and includes let land, houses and managed woodland, and lies almost entirely within the National Park area. The estate runs from the Lecht Ski Centre at its south eastern extremity to just north of Glenlivet in the north, and from the Hills of Cromdale in the west to the east of Chapelton on the eastern side.

We have set out below our response to the Draft Cairngorms National Park Plan 2012-2017 on behalf of The Crown Estate. The response has been numbered using the numbering from the "Consolidated List of questions" attached to the Draft Plan at Appendix 2. This response only relates to the questions which are most relevant for comment on behalf of The Crown Estate, therefore there are not responses to all questions.

Questions 1-3 – Special Qualities of the Park

We support the recognition of the special qualities of the Park as extending beyond the natural heritage, and welcome the addition of the cultural heritage, recreation

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opportunities, tourism, and acknowledgement of the people living and working within the Park as important 'Special Qualities' within the Park.

We encourage the emphasis of the importance of preservation, enhancement and creation of suitable and sustainable communities within the Park, and the provision of suitable housing and economic opportunities for people living and working within the Park.

Question 4 – Strategic Objectives

Notwithstanding the conservation and enhancement of the natural and cultural heritage of the Park as long-term outcomes, the sustainable economic development of the Park is also of fundamental importance to allowing the Park to thrive now and in the future, providing and supporting "thriving and resilient business and communities" and delivering and providing "outstanding visitor experiences".

Condensing these long-term outcomes may dilute the importance of the message which they convey. Of particular importance to our client would be the retention of a strong message on the delivery of housing to meet the needs of those living and working within the Park (number 14); the development of skills and employment options to meet the needs of individuals and businesses, and the stimulation of economic activity promoting thriving businesses within the Park (numbers 10 and 11); and the promotion and development of a "vibrant renewable energy, recycling and waste sector" for the Park (number 15).

Questions 5-6 – Focus for 2012-17

The most important outcomes for the next 5 years for The Crown Estate are the following:

"Outcome 6: The economy of the Park will have grown and diversified, drawing on the Park's special qualities;

Outcome 7: Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park;

Outcome 8: Business and communities will be successfully adapting to a low carbon economy; and

Outcome 9: The Park's communities will be more empowered and able to develop their own models of sustainability."

Comments on each of the Outcomes above form the remainder of this representation.

Question 12 – Focus for 2012-17, Outcome 6

Outcome 6 relates to the economy of the Park. Whilst we support the proposal of growth and diversification of the economy of the Park over the next 5 years, it would be useful to have a clearer definition and explanation of exactly what is meant by "diversification". Furthermore, greater clarification should be given to what new business sectors should be encouraged to develop and grow within the Park".

We support the recognition that if business development is to increase in the next 5 years, that suitable housing for workers must be in place to support this economic development, noted within the table on Outcome 6, under "What's needed to deliver this outcome" and "What packages of work could deliver it". We would, however, like to see this come out more strongly in the words of the text, and suggest adding further text to

explain this and emphasise the need for workers to be able to access housing within the Park.

Question 13 – Focus for 2012-2017, Outcome 7

It is noted that the aims of the park are to protect and enhance the sense of place within the Park. However this Outcome does not go far enough to recognise that the Park also requires new housing, and that there will be a degree of housing development within the Park. Within the table under "What's needed to deliver this outcome", it is noted that "new development is designed and sited in ways that retain and enhance the sense of place and Cairngorms identity". This recognition of new development should also be noted within the main text for this Outcome, whilst recognising that any development must retain the sense of place and identity of the Park.

Within Outcome 6 it is acknowledged that access to suitable housing is required for those working within the park. For consistency, this acknowledgement should also fall within Outcome 7, therefore adding text to include access to housing for employees is requested. In addition, a further bullet-point could be added to the table within the column entitled "What's needed to deliver this outcome" to add further to the consistency, stating "opportunities for new development to provide suitable housing for those wishing to live and work within the Park".

Question 14 – Focus for 2012-2017, Outcome 8

We note and support the ethos of business and communities successfully adapting to a low carbon economy. There is an opportunity here to further emphasise the benefit and opportunity of renewable energy schemes of varying scales to achieve a low carbon economy within the Park area, and more sustainable living and working. We acknowledge that this is mentioned within the table for Outcome 8 under 'What's needed to deliver this outcome', however, it should be within the text of the Outcome to emphasise the opportunity.

This representation is submitted both by email and post to the Cairngorms National Park Authority, together with the completed 'Respondent Information Form' as requested, in advance of the consultation deadline. We would appreciate acknowledgement of the receipt of this representation, and further information in due course about how representations will be scrutinised and taken forward.

Yours faithfully

**Nikola Miller MA (Hons) MSc URP MRTPI
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Cairngorm National Park Plan Comments from Housing & Property Services 28 November 2011

Main Issues Report - Comments

Joint working

We are keen to build on and further develop joint and partnership working via mechanisms such as the Cairngorm Housing Delivery Group and also on a more focused and local level.

Given the current economic climate and constrained resources, which may result in fewer allocated housing sites coming forward for development as hoped and anticipated, it will be important that any challenges to the smooth development of housing sites, which are coming forward, are managed as quickly and straightforwardly as possible.

We will continue to organise regular meetings with those with key role in enabling housing development. As well discussing affordable housing investment planning for the Badenoch and Strathspey area, these will focus on taking forward individual housing sites. We would hope that CNPA officers will continue to play a key role in these meeting which would help to ensure that any issues (e.g. arising from environmental concerns) are identified early and issues resolved.

Recognise that enabling a balance between environmental concerns and meeting the needs of communities is challenging. As CNPA will be aware, the successful delivery of affordable housing development relies on early decision making by all partners including the CNPA. The Council keen to build on the recent positive experience of delivering housing in the CNPA in Manse Road, Kingussie.

In support of preferred approaches re. housing and communities (i.e. Issue 3, Supporting Our Communities; Issue 4, Affordable Housing; Issues 5, Spatial Strategy) and agree with the justifications for the preferred options.

Would like to emphasise that Highland's Housing Need & Demand Assessment (HNDA) demonstrated that the majority of housing required to meet housing need in the B&S area of the CNP is social rented housing. And, as agreed with the CNPA, Highland's Local Housing Strategy set its affordable housing target and investment priorities to ensure that the most appropriate type of housing built where most needed. LDP and related policies should enable the affordable housing target and agreed priorities to be met.

Local Housing Strategy also sets out approach, agreed with CNPA, to ensure that low cost home ownership housing is targeted to ensure that it helps to meet communities' needs. Keen to work with CNPA to ensure that this approach is delivered.

Want to work with CNPA to deliver the agreed Local Housing Strategy including via the LDP and planning processes. Particularly keen to work with the CNPA to ensure that the housing system (i.e. encompassing all housing tenures) is better able to meet communities needs.

Unfortunate that CNPA Affordable Housing Policy will be revised to 25% benchmark given the extent of demonstrated housing need in the Badenoch and Strathspey housing market area alongside the land supply and deliverability challenges. Nonetheless recognise their reasons for making this policy change across the whole CNPA particularly the current economic context. Keen to work the CNPA to monitor and assess the impact of the Affordable Housing Policy.

Questions on Settlements

Agree with preferred options for communities in Badenoch & Strathspey housing market area except for Granttown, Boat of Garten and Carr-Bridge.

As CNPA aware, the Housing Strategy and the associated Strategic Housing Investment Plan sets out the Council's agreed priorities for affordable housing investment in the Badenoch & Strathspey housing market area. Supporting the delivery of affordable housing in the Aviemore area (including An Camus More) is one of the highest priorities.

Question 9 - Granttown

We feel that there may be challenges to delivering housing with the preferred option. Given our experience of land and sites issues in Granttown, we feel that it may not be possible to deliver the identified housing land. Moreover we have concerns that longer term sites have not been identified as they have been in other communities in the Park. Given the extent of the need for affordable housing, the lack of any significant affordable housing development in the last 10 years and the site issues, we feel that there is a need for more options for housing land to be identified (*ideally encompassing a number of different owners*) and for the (currently tight) settlement boundary to be expanded to enable this.

Question 13 – Boat of Garten

We feel that there may be challenges to delivering housing with the preferred option. Given our experience of trying to deliver affordable housing in the village we are aware that the identified sites have significant constraints on their development. We feel that there is for additional sites to be identified if the constraints continue to be insurmountable. We also feel that there would be value in supporting a mix of sites from different landowners.

Question 16 – Carr-Bridge

Given our experiences with trying to facilitate housing development in Carr- Bridge, we have concerns that the identified site may not be deliverable given the on-going constraints and challenges which have yet to be resolved. We feel that there would be value therefore in working to identify additional options for housing development.

Supplementary Guidance

We note that the CNPA developer contributions capture even small developments. This approach is unlikely to tie in exactly with the Council's approach, therefore we

expect there to be two different values on developer contributions – one inside the park area and in the other parts of Highland.

Housing suitable for older and disabled people

Given the projected growth in older and disabled people in B&S as demonstrated in the Highland Housing Need and Demand Assessment, the policy commitments to helping people to live independently at home and the limited availability of land suitable for development which is centrally located and close to services and relevant facilities, we feel there is a role for the planning authority to facilitate the development of housing suitable for older and disabled people. Through, for example, identifying housing sites that are particularly suitable for older people and people with disabilities and encouraging them to be brought forward for this use. On such sites, we feel that it would be appropriate that the density and housing mix reflects the needs of older people and people with disabilities.

If developments aimed at for specifically for older and disabled people are being proposed (such as care homes or housing with care developments) we feel there is a need for consultation with appropriate partners including the Council's Social Work Service and NHS Highland to ensure.

We are currently arranging a meeting with key partners from the Council and CNPA to discuss the land supply issues in more depth as well as options for affordable housing development and meeting the housing needs of older and disabled people in communities etc..

Draft Park Plan

Some of the general comments are relevant to the Park Plan as well as the Main Issues Report.

It is clear the availability of housing continues to be a key concern and priority for communities as highlighted throughout Appendix 4 of Park Plan.

Joint working

We are keen to build on and further develop joint and partnership working via mechanisms such as the Housing Delivery Group and also on a more focused and local level through regular meetings with key partners focusing on housing development.

Enabling Housing

Feel that organisations like HSCHT play an important role in working with communities, landowners and publicly funded agencies. Given their experience and their work to date, we would hope that the CNPA recognises the value in continuing to support them.

With the employment of their Affordable Housing Officer, the CNPA has recognised the challenges and opportunities in the Park area and shown commitment to helping deliver housing (both affordable and private) which meets the needs of communities. Such is enabling a focus on identifying possible innovative solutions including those which are community led.

Park Outcomes

Welcome that role of quality housing recognised within the Park Plan within the outcomes. Have some concerns that provision of housing to meet communities' needs, sustain them and support economic development may appear to be less of a priority for the CNPA than it was in the first Plan. However recognise the desire to keep the plan succinct.

Given the importance of housing and the sustainability of communities as indicated by the vast majority of communities in appendix 4 – keen to see an outcome in the park plan which reflects this e.g.:

“Continued sustainability of communities and the economy supported by access to housing, good infrastructure and facilities”. (page 23 - Question 5)

(Page 11) ‘Relationship of National Park Plans - for clarity and transparency we would be keen to see more information on the other key plans and strategies which impact on the park and their relationship with the Park Plan e.g. Single Outcome Agreements and Local Housing Strategies. Perhaps this could be simply shown in the form of a diagram as on page 12?

Also keen to see more information demonstrating the links between Local Housing Strategy and Local Development Plan.

(Page 20) We feel that the delivery of 250 affordable houses represented significant increase in housing provision where it was required and should be considered a success. It is not clear whether the CNPA consider this a success.

(page 22) we would suggest adding to the ‘Challenges to 2017’ – impact of recession on individuals, communities, and businesses e.g. impact of unemployment, less money circulating etc.. (*This is very distinct from reduced public spending challenge*).

Perhaps, as it isn't clear in the Plan, it is worth highlighting that some of the challenges for 1st 5 years continue to be challenges.

Outcome 6

page 43 – welcome recognition of importance of housing

12a: yes

b: yes

d: THC, RSLs and housing trusts have a key role in helping to deliver this

f: Welcome an indicator which indicates progress on provision of housing which meets communities needs e.g. no of ‘affordable’ houses, lower cost houses provided; percentage of LHS housing supply target met.

g: happy to work with CNPA to provide housing supply figures.

Outcome 8

14b: yes – keen to work with CNPA on ‘piloting ways of reducing the energy needs of old buildings and funding to deliver solutions across the park (package of work 4). Would the links to this be via the Housing Delivery Group?

Outcome 9

15a: yes

15 b yes however we have concerns about the wording. We are keen to work with the CNPA to develop a better understanding of the package of work suggested and the basis of this proposal. In addition, does the package of work it refer to better matching new affordable housing provision with local needs or better matching new housing provision? Suggest package of work should focus on innovation in housing (*i.e. all tenure*) provision. 'Affordable' housing tends to suggest particular products whereas the goal should be to ensure that the market / housing system works better e.g. with the provision of unsubsidised low cost housing which help to meet each community's needs.

If the first definition is meant, is there evidence that affordable housing provision is not meeting 'local' needs? We monitor allocations and are happy to work with the CNPA and communities to explore this issue further.

Is there a definition of 'local' which the CNPA is to use? If not, in our experience local can be a very subjective term. We would be concerned if this was used – particularly as can lead to discrimination. Would also strongly suggest that local is replaced with 'community'. This also fits with the issues raised by communities and their visions set out in appendix 4.

One of the key aims of Highland Housing Register (HHR) Allocation Policy is: 'to help create and maintain strong and economically viable communities'. This is achieved through the award of 'need to reside points' and use of Special Lettings Plans where appropriate to help sustain communities with small populations and housing pressure. Monitoring of allocations in the B&S area demonstrates that the vast majority of allocations are to households with an evidenced need to reside in the community.

Applicants on the HHR with an evidenced 'need to reside are awarded additional points. The intention of the 'need to reside' category is to recognise that households in the following circumstances have a relationship to the community which can be recognised and prioritised as a distinct housing need:

- permanent residence/principal home in a community;
- an offer of permanent employment in a community or;
- an essential need to return to a community to provide or receive essential care or support that would not otherwise be available.

15c: suggest - planning system supports the development of balanced sustainable communities and enables provision of affordable housing.

15d: suggest RSLs are added to list of those with expertise and resources.

15/11/11

Cairngorms National Park Authority
parkplan@caimgormns.co.uk

Dear Sir / Madam

Cairngorm National Park Plan 2012-2017 - Response front MCofS

The Mountaineering Council of Scotland (MCofS) is the representative body for hill walkers, climbers and ski tourers, and is the only national representative body of the sport of mountaineering in Scotland. We have 11,000 members. and are recognised by sportscotland as representing the interests of all mountaineers. The National Park is of huge importance to mountaineers from beyond its borders as well as residents. The MCofS interest in the Park Plan lies primarily in issues of public access and conservation. The latter includes both landscape and biodiversity in mountaineering areas.

We support the four aims for National Parks as set out in the National Parks (Scotland) Act 2000. We welcome the opportunity to work in partnership with the Cairngorms National Park Authority to achieve these aims within the park.

Our response takes into account our strategic principles which state that the upland landscape is an asset to which everyone has the right of responsible access, and which has a scenic, cultural, and economic value to the Scottish people which is worth significantly more than purely its economic value. It should however be recognised that the landscape of the upland areas of the Park are a major feature giving the park its character and coherent identity.

SECTION 2 The Cairngorms National Park (pages 13-15)

(Question 1 - What makes the National Park Special to you?)

It is the wildness of the arctic-alpine zone, and opportunities for quiet recreation and physical challenge both in those areas, and on lowland crags that makes the National Park special to mountaineers. This applies both in summer and winter. The feeling of wildness is central to the special experience that the Park offers,

Question 2 - Do you agree with these descriptions of the special qualities?

Yes

Question 3 - Are there other special qualities you think should be explicitly identified in the National Park Plan?

No

SECTION 3 Vision and Strategic Objectives (pages 16-22)

Question 4 - Do you think the long-term outcomes should be updated and condensed? If so, how?

There may be benefit in condensing the long-term outcomes, but in doing so it is vital not to lose the meaning, particularly of 1 to 4 as these outcomes are the basis for conserving and enhancing many of the special qualities of the Park, and therefore are necessary to deliver other outcomes while maintaining the special and distinct identity of the area.

Another current and future challenge that needs addressed is that of ensuring the landscape context of the Park does not become a ring of wind farm developments. There is already a significant impact on the special qualities of the Park. The achievability of the long-term outcomes is threatened by the numerous developments constructed or consented or at application stage close to the boundary of the Park. Many are highly visible from core upland areas within the Park, and are having a significant impact on the wild quality. These developments are primarily wind energy developments and pose an immediate threat which is growing as the cumulative impacts are already evident and more applications are in the planning system. This is a challenge that is increasing and is likely to continue to do so during the Park Plan period. This challenge needs to be urgently and consistently addressed by the CNPA exerting as much pressure on decisions outside the National Park as is in its power.

SECTION 4 What should our focus be for 2012-2017 (pages 23-56)

Question 5 - Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

Broadly, we agree with the 10 outcomes. We are, however, concerned that outcomes 7 and 9 are threatened by policies in the local plan. In particular, plans for An Camas Mor have illustrated that there is strong feeling among the local community that this is not an appropriate development. The achievement of outcome 7 is threatened by this significant new settlement. It would change the sense of place within the landscape contrary to Outcome 7. The achievement of outcome 9 is also threatened by this development as parts of the community have alternative models for community sustainability that they feel have not been listened to and seriously considered.

Question 6 - Which are the most important outcomes to you?

The MCofS greatly welcomes the aim of achieving outcome 4 in particular.

For each of the 10, five-year outcomes for the Park (pages 26-56):

Questions 7, 8, 9, 10, 11, 12, 13, 14, 15, 16

A Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

B Do you agree that the packages of work identified for this five-year outcome would deliver it?

C Are there any better packages of work that would deliver the outcome?

D What can you/your organisation do to deliver the outcome? eg provide leadership and co-ordination, provide skills and advice, provide money. suggested for this outcome?

F Can you tell us about better indicators or more appropriate targets?

G Can you provide data for better indicators?

Question 7 - Outcome 1

A Yes, the MCofS agrees with this outcome.

B They will contribute to its delivery.

C No

D The MCofS already helps to deliver this outcome through promoting responsible behaviour amongst mountaineers via our website, magazine and specific advice. Recently we produced a one-stop-shop advice booklet on minimising impact for mountaineers, which also signposts more detailed advice on practices such as wild camping and toileting. These have been distributed to a number of outlets in the Park, although we are constrained by the expense in how many and how far these can be distributed and would welcome a dialogue with CNPA as to how wider distribution might be achieved. We also delivered a training day in the Park for mountain leaders in minimising impact for them and to pass on to their participants. A representative from the MCofS has also been an active member of the Cairngorm Local Outdoor Access Forum. The MCofS is happy to continue to offer expertise and advice on the relevant issues. We will continue to promote responsible access to mountaineers within the restrictions of resource availability.

E Yes

F No

GNo

Question 8 - Outcome 2

A The MCofS agrees that the headline outcome is appropriate, but we would want to see a priority placed on upland habitats at a landscape scale. Upland species and communities are one of the most threatened by climate change. This is due to the fact that migration is restricted by the altitudinal limit of the landscape. Additionally, arctic-alpine habitats are disconnected by their very nature, being restricted to areas above certain altitudinal limits, and population expansion into other areas is restricted by low competitiveness of the species and specialisation to the harsh high altitude environment often disadvantaging them at lower altitude. Their ability to migrate north and or up in altitude is therefore severely curtailed, so local extinction may mean a permanent loss with no prospect of natural replacement. This habitat also offers numerous ecosystem services, and is integral to the special quality of wildness.

B Many parts of the package of measures would also contribute to upland habitats, however specific measures will be needed to address specific challenges to the uplands habitats, such as increasing the resilience of existing populations and seeking to re-establish lost populations.

C A landscape scale habitat enhancement programme needs to identify opportunities for the upland habitat. People management is highly important in this area. COAT is doing some vital work through repairs to upland routes. **The** continuation of the "closed system" at Cairngorm mountain is important to manage pressure on the plateau in the vicinity of the easy access afforded by the high altitude car park and funicular.

D The MCofS will continue to promote minimisation of impact to mountaineers. We can also continue to offer advice and promote relevant volunteering opportunities.

E Yes, as far as they address woodland and wetland habitats.

F An indicator for the upland habitat could be set at a proportion of upland routes surveyed by COAT that are "fit for purpose." Also a measure of upland area affected by visitor pressure maybe appropriate, although we are not aware of any baseline measure against which this could be measured.

GNo

Question 10 - Outcome 4

A Yes, the MCofS strongly agrees with the need for this outcome to conserve the special qualities of the Park. We welcome the recognition that CNP wildness is affected both by a view from within the Park outwards, as well as a view of the Park from beyond the boundary and within the Park. We

agree that wildness is one of the defining features of the Park, and also that it is the "glue" for the identity of the Park.

B The MCofS particularly welcomes the recognition that there may be circumstances where a development cannot be mitigated to the extent that it becomes acceptable, and that some developments simply should not happen because of their inappropriateness at the proposed location. The MCofS also particularly welcomes the outcome that people will continue to be able to experience wildness throughout the Park, rather than setting aside some of the Park where wildness is considered important, and the remaining area where it is not. Wildness is a special quality of the Park as a whole. Additionally, we agree with the triple objectives of protecting, maintaining and enhancing wildness as a balanced approach which is flexible enough to be implemented across the areas of the Park with varying wildness qualities.

With regard to hill tracks, as well as following best practice guidance on design and maintenance, it would be appropriate for CNPA to utilise the powers over hill track planning within the National Scenic Area as a mechanism for controlling inappropriate development of this type.

C Please refer to the answer under Question 8C, in addition to those proposed. The Wildness Supplementary Planning Guidance would benefit from full integration into the Local Development Plan.

D The MCofS will continue to promote an understanding of, and respect for, wildness. We will also continue to keep mountaineers aware of the achievements and challenges in the Park to this special quality through notifying members through our communication channels of issues arising in the Park and encouraging engagement.

E The MCofS agrees with this indicator, but would wish to add that there should be no loss to quality or locations where there is currently high wildness value. There should be no trade-off of high quality wildness for a larger area of lower quality wildness. Although this may result in no net loss of wildness, it would incrementally change the character of the Park.

F No

GNo

Question 13 - Outcome 7

A Yes

B The MCofS considers that the proposal for a large, entirely new settlement is at odds with this outcome. An Camas Mor will change the character of this area of the Park and alter the detract from the communities sense of place in the landscape.

C Many in the local community have expressed a desire for small-scale growth of existing settlements.

E Yes, but the indicator is insufficient.

F An indicator or target for communities' satisfaction with their sense of place in the landscape would be appropriate.

G No

Question 15 - Outcome 9

A Yes

B Yes

C There is a perception of a lack of alignment of this outcome with the contents of the local plan, specifically the proposal for An Camas Mor. There is dissatisfaction in the community and a feeling of disempowerment, hence on this issue the outcome is not being achieved.

E Yes, but they are insufficient.

F As with the response to Outcome 7, there needs to be a measure of community satisfaction and empowerment. Additionally, an assessment of alternative models of community sustainable growth would be appropriate.

GNo

SECTION 5 Managing competing demands on the land - Land use strategy
(pages 57-82)

Question 17 - Do you agree with the key principle on page 58?

Yes

Question 19 - Do you agree with the opportunities and threats identified, if not why?

The MCofS interests lie primarily in the mountains, moor and heathland ecosystem, hence our comments are restricted to this. We agree with the opportunities and threats identified, particularly those focussed on wildness.

Question 20 - What are the particular opportunities and threats that you think the Plan should address between 2012-2017?

There is great urgency to address the threat of a reduced sense of wildness as a result of the visual impact of development. The minimum should be to achieve no loss between 2012-17 as wildness is extremely rarely gained, and frequently lost both through incremental development as well as major development. Enhancing wildness is dependent on protection before it is lost. For that reason maintenance is the minimum the Plan should address during 2012-17.

Inappropriate grazing by stock or wild mammals that adversely affects habitat condition is the other important issue to address in the 2012-17 Plan, particularly with respect to delivering on the opportunity to manage change towards montane scrub and habitat resilience.

A third issue that needs addressed in the 2012-17 period is the rate of erosion exacerbated by human activity and potential changes brought about by extreme weather events. The MCofS welcomes the excellent mountain heritage project currently being delivered by COAT to address human activity erosion in the uplands. This threat is likely to have the greatest impact where there is intense human activity on vulnerable thin soils found on the plateau, as is the case around the Cairngorm summit and the corrie rims to the west. For this reason we would strongly counsel against a further relaxation of the Visitor Management Plan closed system.

For each of the eight policy directions (pages 67-82):

Questions 21, 22, 23, 24, 25, 26, 27, 28

A Do you agree with the proposed approach?

B Would you suggest a different or additional policy approach?

Question 21 - Policy Direction 1 - Enhance the special landscape qualities

A The MCofS strongly supports the proposed approach to conserve and enhance wildness, and monitoring it as a special quality.

Question 22 - Policy direction 2 - Enhance biodiversity

A The MCofS agrees with this approach, particularly with reference to ecosystem health and functionality beyond designated site boundaries.

B Additionally, the ecosystem health and functionality of designated sites would greatly benefit from monitoring and enhancing the sites health as a whole, and not just the designated features.

Question 23 - Policy direction 3 - Expand and enhance woodland

B Additional to the stated approach, we would recommend a wide definition of "woodland" that explicitly encompasses montane scrub and that the policy of expanding and enhancing applies to this habitat as well as the more generally recognised native woodland types.

Question 24 - Policy direction 4 - Enhance resilience of habitats **and** land use to climate change

B As noted above, high altitude habitats and species are faced with a unique challenge. Where connectivity can be enhanced, this needs to be a priority as should any other measure to enhance the resilience of these habitats.

Question 26 - Policy direction 6 - Provide high quality recreation opportunities

A In general, the MCofS agrees with the policy approach.

B We consider it necessary to make it clear that access is a right if exercised responsibly. For this reason, access should not be restricted on the basis of benefit for habitat and species unless a significant benefit can be shown to result from the restriction. If the current threat to the species is not related to access being exercised but, for example climate change, then we would not consider it acceptable to restrict access.

Question 28 - Policy direction 8 - Develop sustainable patterns of settlement growth, infrastructure and communications

A The MCofS is opposed to the approach of a large new settlement. The MCofS believes that housing need should be met through sensitive development of existing settlements.

B The MCofS believes that the first policy direction approach should be enabled to deliver the housing needs of the area and that this would be a more sustainable approach than that proposed.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer

Tactran

The Tactran consultation response on the Draft National Park Plan is:

The Partnership is broadly supportive of the Vision, Objectives, Outcomes and Policy Directions.

It is believed that the Outcomes could be made more effective. Delivery for Outcome 8 should make reference to promotion of car sharing and rural car clubs. In terms of indicators accessibility modelling is recommended to measure improved accessibility by non-car modes. Outcome 10 fits well with the Tactran regional Health and Transport Framework in promoting more active travel. We would be pleased to work with the National Park Authority on delivering this Outcome.

Policy Direction 8 accords with the Regional Transport Strategy, though it is considered that driver safety on the A9 needs to be paramount when implementing schemes to maximise views from the route.

Development and Strategic Transport Planning Team
Major Transport Infrastructure Projects

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Direct Line: 0141 272 7955, Fax: 0141 272 7272
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CÒMHDHAIL
ALBA

Cairngorms National Park Authority
FREEPOST NAT 21454
Grantown-on-Spey
Moray
PH26 3BR

Your ref:

Our ref:
C2611499

Date:

22 November 2011

Dear Sirs

**Draft Cairngorms National Park Plan 2012-2017
Public Consultation**

I refer to the above consultation.

The Draft National Park Plan sets out a position and an approach around promoting sustainable economic growth, whilst still recognising the unique nature of the National Park and the need to work collectively to achieve the three other aims of national parks as set down in the National Parks (Scotland) Act 2000. You have stated in the Document that there are likely to be conflicts when trying to deliver all these aims. Transport Scotland is keen to engage with you to ensure that these are kept to a minimum where they apply to the strategic transport network.

Transport contributes to increasing sustainable economic growth by connecting people to jobs, education, services and recreation; and connecting businesses with customers and suppliers. Scottish Planning Policy sets out the Scottish Government's position on land use and from a Transport Scotland perspective relates to reducing emissions from transport; a shift to more sustainable modes of transport, which for people means a transfer from car-based travel to walking, cycling and public transport, and for goods from road to rail.

It is important to be a realistic about the availability of public transport in rural areas and innovative solutions such as demand responsive public transport and small scale park and ride facilities at nodes on rural bus corridors should be promoted.

You make reference to a number of "Five-year Outcomes", some of which are relevant to Transport Scotland. Outcome 6, "The Economy of the Park will have grown and diversified, drawing on the Parks' special qualities," refers specifically to improved transport connectivity. Transport Scotland would be keen to understand the impacts and effects of this work on the strategic transport network.

Outcome 8, "Business and communities will be successfully adapting to a low carbon economy" which expects people to make more use of public transport; increased usages of paths for foot and cycle use; public transport will be lower carbon in nature; and there will be increased support for demand responsive public transport. These are all measures which meet the requirements of the

Scottish Planning Policy and which are supported by Transport Scotland. What is of interest is the mechanism for ensuring these measures are provided.

Your draft Park Plan also seeks views on a number of proposed policy directions. Policy 8 - "Develop sustainable patterns of settlement growth, infrastructure and communications" has been developed in the Main Issues Report of the Local Development Plan, and a Scottish Government response will be provided for this consultation through the Directorate for the Built Environment. Nevertheless, it should be noted that Transport Scotland has provided a planning response for the Am Camas Mòr development when the planning application for 1,500 houses and other facilities was supported without any conditions attached.

We also note your policy of supporting the Scottish Government's aspirations to enhance the A9 and main railway line between Perth and Inverness, both of which will improve the connectivity of the Highlands.

Engagement is vital and Transport Scotland is keen that this is developed through your National Park Plan or Local Development Plan work to ensure that your vision of "an outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together" is achieved.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Stewart Turner', with a stylized flourish at the end.

STEWART TURNER



Cairngorms National Park Plan VisitScotland response

Thank you for providing VisitScotland with the opportunity to respond to the above consultation. Although you request responses via the consultation document, our response on this occasion is more general, focusing on the importance of tourism to the Scottish economy and to the Cairngorms National Park, and VisitScotland's role in the implementation of the National Park Plan.

Background

VisitScotland, as Scotland's National Tourism Organisation, has a strategic role to maximise the sustainable economic benefit of tourism for Scotland. It exists to support the development of the tourism industry in Scotland and to market Scotland as a quality destination.

Tourism is crucial to Scotland's cultural and economic well-being and sustains a great diversity of businesses throughout the country. According to a recent independent report by Deloitte, the industry generates over £11 billion for the Scottish economy in direct and indirect spend, and employs over 200,000 – 9% of the Scottish workforce. Overall, tourism provides jobs in the private and public sectors and stimulates the regeneration of urban and rural areas.

Growing tourism revenues and positioning Scotland as one of the world's foremost tourism destinations is a key ambition for VisitScotland and the Scottish Government. This ambition is now common currency in both public and private sectors in Scotland, and the expectations of businesses on the ground have been raised as to how they might contribute to and benefit from such growth.

Partnership

Partnership working is crucial to the continuing growth of Scottish tourism - only by collaborating can the industry face the challenges ahead. In subscribing to the latest Cairngorms National Park Plan, VisitScotland remains committed to developing the visitor economy in and around the National Park by working in partnership with the National Park Authority, the relevant local authorities, the enterprise network, and Scotland's tourism industry.

Tourism touches every part of society, supporting Scotland's local economies where other industries cannot. With this in mind, VisitScotland will continue supporting both community tourism development initiatives and wider economic development proposals which will improve the visitor experience in and around the National Park, encouraging social improvement and economic growth.

In 2008, VisitScotland established the Growth Fund to support fully constituted groups of 3 or more tourism businesses in marketing products and services to their maximum potential. The fund is open to national, regional and local groups with a focus on increasing visitor numbers and encouraging longer stay, targeting new and emerging markets, and promoting Scotland as a year-round destination.

The Cairngorms Business Partnership (CBP) has already received grant support from the above and we will continue to engage positively with them to support their ongoing marketing activity in alignment with VisitScotland activity. VisitScotland has also supported through our Growth fund, marketing of the Cairngorms Equestrian Centres through a bid co-ordinated by the CBP and we would encourage similar sectoral groupings within the National Park to work in association with the CBP to investigate the opportunities offered by the Growth Fund in helping to develop their existing resources to make it easier to reach consumers. We would encourage any sub-area destinations within the National Park to work with the CBP, in order to avoid potential duplication, when considering approaching VisitScotland for growth fund support. We have also supported the Royal Deeside & Cairngorms DMO and we would encourage greater alignment between CBP and Royal Deeside & Cairngorms DMO in any future marketing activity.



Integration across all sectors in Scotland is key to developing the tourism offering, showcasing the wide array of things to see and do the country has to offer the visitor, and positioning the country as a must-see, must-return destination. VisitScotland is committed to helping both consumers and the tourism industry understand and benefit from collaboration, including fostering an understanding of the interdependency of transport, infrastructure development, the public and private sectors, and local authorities; and the positive impacts of interdisciplinary collaborative enterprises.

Attracting visitors and the developing the visitor experience

VisitScotland's award-winning domestic and international marketing campaigns promote Scotland and its outstanding assets to visitors in all parts of the world - including those living in Scotland. The new year-round *Surprise Yourself* campaign, targeted at the lucrative UK and Ireland market, has already brought in a massive £90 million for the Scottish economy since its launch in March this year. Likewise, last year's European campaign - *Meet the Scots* - brought in an additional £97 million from key markets like France, Spain and Germany.

National Parks are an important facet of the country's tourism offering, and VisitScotland will continue to promote the Cairngorms National Park as a must see destination for visitors and locals alike throughout the organisation's suite of marketing activity.

VisitScotland will continue to offer the National Park Authority expertise and experience in UK and international market intelligence and consumer trends to allow for more efficient and effective targeting of potential visitors, helping maximise the return on investment from marketing activity. VisitScotland will also continue to provide advice and support on destination and product development, brand development, and visitor management practises, helping the National Park to better position itself as a visitor destination and manage those visitors in a sustainable way.

VisitScotland will continue to offer a suite of marketing products and PR opportunities to the National Park Authority, groups and individual businesses, and will be pleased to create or customise particular products and packages to meet specific local and regional requirements.

Information and advice

VisitScotland will continue to offer strategic advice and guidance through a variety of local and national communications channels. These include via the area tourism partnerships network; through the organisation's close relationships with local authorities, the Scottish Government and Scottish Parliament; our practical relationships with the enterprise network, and with local marketing and regional industry groups.

VisitScotland will continue to provide visitor information services through the network of nearly 100 VisitScotland Information Centres, and Information Points delivered in partnership with local tourism businesses. VisitScotland is committed to exploring partnership and other opportunities for delivering information in response to changing consumer demands, and to offer the most efficient service. We will actively engage with CNPA and CBP in considering how best to deliver a quality Information service to visitors across the National Park.

There are currently 9000 businesses registered throughout the range of quality assurance schemes offered by VisitScotland, and the world-renowned model has been adopted by countries as diverse as Northern Ireland, Sweden and Namibia. The organisation has the ambition to achieve 100% industry participation in the coming years.



The continuing quality assurance of accommodation, activities and attractions will benefit the tourism industry within and around the Park by driving up standards and delivery, and growing visitor confidence.

Conclusion

VisitScotland is committed to supporting the continuing development of Cairngorms National Park, and the implementation of the National Park Plan, as detailed above.

We are supportive of the three strategic objectives and are particularly keen to see positive actions in support of strategic Objective 2 "To develop a sustainable economy that supports thriving and resilient business and communities" and that opportunities are identified for sustainable economic development.

We also agree with the 10 proposed five-year outcomes and the 8 proposed policy directions, although it would be helpful if a priority ranking was given to the outcomes and associated actions.

VisitScotland is keen to continue working closely with the Cairngorms National Park Authority on all aspects of attracting and managing visitors, and developing and improving the visitor experience.

6 December 2011

From: Alan Melrose

Sent: 25 October 2011 12:30

To: Park Plan

Subject: comment on Outcome 10

In relation to 'what packages of work' can deliver Outcome 10. My suggestion would be to make reference to the 'delivery of a specific Cairngorms Health walk project'. It could follow through with an indicator of 'Does every community/settlement in the Cairngorms have access to a Health walk opportunity?'

I believe this would produce a deliverable output with evidence of health improvement.

Alan Melrose

**Consultation on:
Draft Cairngorms National Park Plan
2012 - 2017**

The Woodland Trust Scotland (WTS) welcomes the opportunity to respond to this consultation on the Cairngorms National Park (CNP) draft plan. We are part of the UK's leading woodland conservation charity. We have three aims: to enable the creation of more native woods and places rich in trees; to protect native woods, trees and their wildlife for the future; to inspire everyone to enjoy and value woods and trees. We own over 1,000 sites and have 300,000 members and supporters UK-wide and in Scotland own 80 sites covering 8,750 hectares (ha).

The five National Park Principles are welcomed and provide the CNP Authority with the opportunity to take sustainable land management beyond 'business as usual' and demonstrate best practice. WTS looks forward to working with the NPA in delivering these principles where it can.

Throughout this response reference will be made to native woodland expansion. All the benefits that can be gained from increasing the area of native woodland are given at the end of this response. These can neatly be described as Carbon +, i.e. carbon storage plus the many other benefits and ecosystem services including ecological adaptation to changes in climate already in existence.

General Comments

- **The Draft Plan** is a comprehensive and wide ranging plan for the future of the National Park.
- **Introduction.**
The Economics of Ecosystems and Biodiversity interim report of 2008 eloquently highlights that the environment is the physical reality upon which social and economic success depends. Society is a construct which exists within the environment, and 'economics' is a social construct within society. Our view, therefore, is that the **environment** needs to be highlighted as the number one key to success of the other National Park aims.
- We would like to see the value of individual ancient and veteran trees and areas of old growth woodland included in the Plan. For further information, please see <http://www.ancient-tree-hunt.org.uk/>
- A commitment in the Plan that all Planted Ancient Woodland Sites (PAWS) will be under the process of restoration, would be a good example of how the NPA could demonstrate sustainable land management.
- We would like to see an increased emphasis on creating areas of woodland near to where people live and to enhance and buffer native woods of high conservation value.
- We would recommend implementation of a target to double the area of existing native woodland (10% land area existing). Investing in increased areas of native woodland will aid the NPA and its officers to achieve their duty to further the conservation of Biodiversity as defined in the Nature Conservation (Scotland) Act 2004.

- We would like to see a commitment to enabling all primary school children in the Park area to learn (across the full curriculum) outdoors as part of their formal education on a weekly basis.
- We would like to see more emphasis on how the CNP Authority values the environment and incorporates that into decision making. For example, The Economics of Ecosystems and Biodiversity report has developed an approach of valuing and taking account of the natural environment in decision making. For information see : <http://www.teebweb.org/> . In addition, the National Ecosystem Assessment provides further analysis of the UK's natural environment in terms of the benefits it provides to society and continuing economic prosperity. For information see: <http://uknea.unep-wcmc.org/>

Questions

1. Question 1

The landscapes and habitats, particularly the native and ancient forests and woods.

The access and recreation opportunities for people of all abilities, all year round.

The fact that the primary aim of the National Park is to conserve and enhance the natural and cultural heritage.

The sustainable management of the land and the desire to go beyond 'business as usual' and demonstrate best practice, thereby leading the way in the delivery of the aspirations of the Land Use Strategy for Scotland.

2. Question 2

Yes we agree with the qualities.

3. Question 3

No.

4. Question 4

Yes.

No. 1 - we would like to see **landscape and habitats** conserved and enhanced. Including reference to protection of high value habitats for nature conservation (e.g. ancient, native and semi-natural woods).

No. 12 – we would like a categorical statement that housing need will be delivered without damage to high value habitats for nature conservation.

No. 22 - We would like to see an ambition to ensure every primary school pupil in the Park area has access to outdoor learning (across the curriculum) as part of their formal education, on a weekly basis.

5. Question 5

No. There is potential to merge numbers 2 & 3 as in our view they will be delivered by the same actions.

No. 2 - We are supportive of the Landscape Scale approach to habitats. We would recommend reference to 'native' habitats in this outcome.

No.3 – Our approach to increasing biodiversity for endangered or iconic species would be based

on creation and measurement of native habitat enhancement, rather than specific management for individual species.

No.5 – We would like to see emphasis on advice to landowners which can integrate agriculture and forestry interests.

No.7 – We seek assurance that delivering new housing ambitions will not impact on habitats on high value to nature conservation.

No.10 – It is a huge ambition to improve the health and enjoyment of residents and visitors and extremely difficult to measure. We would recommend this ambition is measured by the improvement in opportunities for recreation and numbers of people using it, rather than the improvement in health – which could be assumed as a result of increased use.

6. Question 6.

No.2 – The issue of a landscape scale approach to land management is crucial, in particular for ecological adaptation to climate change. This includes habitat networks that enable ecosystems to function across the landscape. Not only will this enhance the landscape (as stated) it will enhance biodiversity.

It is also important to emphasise that **protection** of habitats of high value for conservation (including native woods) will be protected by NPA planning policies and positive land management. Restoration of all plantations on ancient woodland sites (PAWS) and native woodland expansion would be priorities that Woodland Trust Scotland would advocate.

No.5 - An enhanced advisory service that combines both forestry and agriculture land uses is desirable and a better integrated grants system which balances agricultural grants with forestry ones and targets areas where the multiple benefits will be most felt. However, the subsidy will be difficult to influence, other than at RPAC level.

Increasing tree cover was recognised by the National Ecosystem Assessment (2011) as one of the measures which could be used to increase delivery of ecosystem services in a number of areas. Unfortunately, trees and agriculture are often viewed as competing land uses. This dichotomous view is unhelpful and needs to be addressed. An increase in tree cover on farms can be shown to support productive farming; providing shade and shelter to improve animal welfare and increase food efficiency, reducing wind damage to crops and reduced evaporation, providing an alternative source of on-farm energy and timber. But it requires a re-evaluation of forestry in an agricultural landscape. Whilst we are familiar with the management of individual trees in urban areas, there has been less focus on the importance and value of scattered trees, shelter belts and hedgerow trees in the rural landscape. And yet these 'trees outside woods' represent a significant proportion of canopy cover, contributing both to productive agriculture and to ecosystem services such as water management, biodiversity and cultural landscapes. Food security is currently seen as the highest priority but need not be a barrier to land being allocated to woodland.

No.10 - There is increasing recognition of the importance of a good environment in ensuring a healthy population. A strong correlation exists between poor health outcomes and a poor natural environment.

No.1- The number of people interacting with the environment is important for the long term protection and enhancement.

No.7 – We are concerned that housing development does not have a negative impact on woods of high conservation value.

7. Question 7

- a) Yes
- b) Yes
- c) We would recommend an approach to outdoor learning which focuses on skills and confidence for primary school teachers, enabling them to teach across the curriculum using the outdoors as a classroom.
- d) WTS has developed an outdoor learning pack for primary school teachers which can be found at: www.woodlandtrust.org.uk/bowl
- e) Yes

8. Question 8

- a) No. We think it should highlight that the benefits include biodiversity and ecological adaptation to existing climate change as well as landscape.
- b) No.
- c) We think they should include a commitment for all PAWS in the area to be under a process of restoration and protection of semi-natural and high value habitats for conservation. Native woodland creation targeted either close to where people live or buffering and extending existing native woods, provide the best outcomes for people and wildlife.
- d) The Woodland Trust holds the Space for People data which identifies all existing accessible woodland near to where people live, and this can be used to target new creation areas. WTS has an advisory service for landowners wishing to create new native woodland.
- e) No.
- f) We would prefer to use new **native** woodland near to where people live or extending/buffering existing native woods as the indicator. With semi-natural woodland in CNP area covering 10% land we would recommend a target of doubling the area of native woodland.
- g) The Forestry Commission Scotland could provide such data.

9. Question 9

- a) No. We think this should be measured as a habitat improvement and enhancement objective rather than the species which will be the beneficiaries.
- b) No.
- c) We think that a habitat network for the Park should be produced to prioritise habitat creation in strategically important areas and advice with incentives to support it.
- d) We have mapped accessible woodland near to where people live and concentrations of native woodland of high value for conservation, enabling the production of strategic woodland creation plans.
- e) No.
- f) We would suggest measuring the increase in habitats that the species rely on.
- g) Forestry Commission Scotland could provide data.

10. Question 10

- a) Yes.
- b) No. However we are extremely appreciative of the commitment to protect individual trees and habitats of high conservation value from development.

- c) A commitment in the Plan that all PAWS will be under the process of restoration, would be a good example of the Park's approach to increasing wildness.
- d) We have PAWS advisors who work with landowners to promote and plan the restoration process.

11. Question 11

- a) Yes.
- b) No. There is no evidence that there will be any new or co-ordinated advice from land owners. This approach is unfortunately relying on the status quo and therefore unlikely to change due to public sector spending pressures. This is a good opportunity for the NPA to 'go beyond business as usual.'
- c) An enhanced advisory service that combines both forestry and agriculture land uses is desirable and a better integrated grants system which balances agricultural grants with forestry ones and targets areas where the multiple benefits will be most felt.
- d) WTS has a team of advisors for land managers on woodland creation and PAWS restoration.
- e) No.
- f) This could be measured by habitat improvements. E.g. native woodland creation or habitat network enhancement. i.e. action as a result of advice that complies with CNP priorities.
- g) Forestry Commission Scotland could provide data.

12. Question 13

- a) Yes. This is a clear statement that development will not damage or impact negatively on trees or woods of high value for conservation and we agree strongly with this approach.
- b) No.
- c) The Planning Authority should implement the outcome as described in our answer 13a).
- d)
- e) No.
- f) We do not think that the number of high street improvement projects is a reasonable measure for outcome 7. Design and implementation of Planning advice would be a reasonable measure.

13. Question 16

- a) No. Research tells us that there is a direct link between health and exercise, however, we think it would be difficult to measure changes in health and enjoyment in the Park. A simpler measure could be monitoring the provision of recreation opportunities and measuring how many people are using them. There is then a strong connection to health and enjoyment.
- b) Yes.

14. Question 17

No.

15. Question 18

We agree with the provision of multiple benefits. We do think that the proposed policy directions miss a categorical statement regarding the protection of native woods and trees of high value for conservation.

The principle states that 'long term outcomes, always ensuring that the special qualities are conserved and, **where possible** enhanced. However, according to the definition of aim 1 in the National Parks (Scotland) Act 2000 - to conserve and **enhance** the natural and cultural heritage

of the area is the primary objective. The enhancement of the area should therefore be an **obligation**.

16. Question 19

Yes.

17. Question 20

The significant opportunities and threats described on page 66 would be appropriate.

18. Question 21

A. Yes.

19. Question 22

A. No. We do not agree that a presumption of no net loss is going beyond 'business as usual'. We would expect the CNP Authority to be aiming for conserving and enhancing biodiversity, for example, investing in increased areas of native woodland will aid the NPA and its officers to enhance delivery of their duty to further the conservation of Biodiversity as defined in the Nature Conservation (Scotland) Act 2004.

B. We think this should be delivered through habitat management and creation at a landscape scale.

20. Question 23

A. No.

B. A commitment in the Plan to double the area of native woodland would aid the delivery of many of the CNP plan aims. The map on page 73 highlights the potential to achieve a doubling of native woodland. Native woodland is one of the most biodiverse habitats in the country. To deliver the Biodiversity duty defined in the Nature Conservation (Scotland) Act 2004 an increase in native woodland cover is essential. We would like to see more emphasis on this in the Plan and acknowledgement of all the benefits native woodland can bring.

A commitment that all Planted Ancient Woodland Sites (PAWS) will be under the process of restoration, would be a good example of the Park's approach to management and enhancement.

21. Question 24

A. Yes.

22. Question 25

A. No

B. Energy Efficiency needs to be included along with public transport.

23. Question 26

A. Yes.

24. Question 27

A. Yes.

B. It will be difficult to rely on existing resources to provide advice. A specific new advisory service for the CNP area is our recommendation for making this approach work. Otherwise we doubt it will achieve the laudable direction.

Specific Comments

1. Vision and Strategic Objectives, page 16

We are delighted that the first strategic objective includes the emphasis on enhancing the natural and cultural heritage.

There is a problem with the second strategic objective. A definition is required of what is meant by sustainable economy. Our view is that the current metaphor for sustainable development as a 'three legged stool' is no longer valid. It gives equal importance to environmental, social and economic perspectives. However, 'society' is a construct which exists within the environment, and 'economics' is a social construct within society. In other words the only one with a physical reality is the environment, upon which the other two are entirely dependent. To afford them equal status is both a category error and a gross conceit.

Why is native woodland important?

Many of the benefits outlined are true of both native and non-native trees e.g. provision of shade and shelter, or temperature reduction through evaporative cooling. In this case it is important that the multi-functional benefits of native trees are emphasised, in particular their biodiversity benefits, alongside more generic benefits.

Introduction

There are increasing opportunities for native trees and woods to deliver benefits to society. The discourse around the natural environment is moving from a focus solely around issues such as biodiversity, designation and protected areas, species conservation and an oppositional stance to agriculture, towards adaptation and mitigation to climate change, delivery of ecosystem services and integrating ecosystems into productive landscapes.

The traditional benefits of trees and woods recognised by land owners – timber, shelter for livestock, aesthetic appearance, sporting value – are being supplemented by a range of 'public goods'¹ in the form of 'ecosystem services'.

Farms

We have developed a position on food security which emphasises the need for a thriving and resilient ecosystem².

Our 'Trees for farms' report highlights the benefits of trees to agricultural systems³. These include

- Adapting farming systems to threats and opportunities from climate change – the role of trees in shade and shelter, energy conservation, supporting pollinating insects and soil conservation
- Mitigating Greenhouse gas (GHG) emission – carbon sequestration, on farm energy production, reducing diffuse pollution and livestock GHG emission.
- Meeting immediate or perceived threats from public pressure, regulation or punitive measures - managing surface water and sedimentation runoff to water courses, meeting voluntary environmental measures.
- Generating income from sale of products – timber, fuel
- Improving sporting opportunities and aesthetic appearance of the holding

Many of the benefits will accrue directly to the landowner. In other cases they may represent public goods e.g. improvements to water quality or support for biodiversity. In this case the benefit to the farm business comes through agricultural support payments via the CAP.

Local Authorities

A number of issues can be identified in which tree planting and woodland creation might provide particular benefits;

- Climate change adaptation for settlements – reduction in urban heat island effect, improvement of air quality, reducing building energy budgets. Local Authorities have an obligation under the Climate Change (Scotland) Act 2009.
- Managing flood risk - Local Authorities have a duty to draw up flood risk management plans and to implement measures to reduce risk. They have specific responsibility for surface water management, a particular problem for urban areas. Our 'trees and flooding' report highlights the role of trees in surface water management.
- Improvement in air quality – Local Authorities have an obligation to monitor air quality and to undertake measures to reduce levels below defined thresholds.
- Development of green infrastructure – particularly in new developments.

Health

There is increasing recognition of the importance of a good environment in ensuring a healthy population. A strong correlation exists between poor health outcomes and a poor natural environment.

The primary health benefits of native tree planting and woodland creation arise from trees in urban areas;

- Reduction in urban heat island effect – In the 2003 summer heat wave over 2,000 people died in Britain alone and more than 50,000 died across Europe⁴. Trees provide direct benefits from reduced heat stress and indirect benefits through reduction in production of ground level ozone (less relevant in Cairngorms area).
- protection from environmental exposure e.g. Improvements in air quality – adsorption of particulates and other pollutants - reduction flooding – with reduction in stress associated with those people living in high risk areas
- General improvements in mental and physical health associated with a high proportion of green space and trees in particular - relaxation and reduction in stress

- Increase in physical activity; and
- Greater social interaction and cohesion.

Water Interests

Benefits from tree planting and woodland creation include;

- Reducing risk of fluvial (river) flooding – through woodland measures in the upper catchment and on flood plains
- Reducing risk of pluvial (surface water) flooding – the greatest flood risk in the UK. Increasing tree cover, particularly in urban areas, can reduce risk of surface water flooding.
- Improvements in water quality – through interception of diffuse pollution, as buffering strips to water courses and in management of waste water (for instance in Sustainable Urban Drainage Schemes – SUDS)

6th December 2011

For further information please contact:

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¹ Public Goods are those which are non-excludable and non-rival. That is, their use is freely available and one person's use does not detract from the ability of another person to use that good e.g. the air we breathe. In practice few goods are pure public goods. For instance National Parks are freely available for people to enjoy (non-excludable) but at a certain level of use the enjoyment is spoilt by the number of people present i.e. they become 'rival'. Because they are non-excludable public goods are undersupplied by the market.

² *The Woodland Trust's view on food security and land use in the UK*, **Woodland Trust internal briefing note (2010)**

³ 'Trees for Farms', **Woodland Trust internal briefing note (2010)**

⁴ [Shaoni Bhattacharya](#) (2003) European heat wave caused 35,000 deaths, *New Scientist online*, 10th October 2003, downloaded at: <http://www.newscientist.com/article/dn4259-european-heatwave-caused-35000-deaths.html>

⁵ Folke, C. (2006) 'Resilience: The emergence of a perspective for socio-ecological systems analysis', *Global Environmental Change*, 16 (2006) pp. 253-267, available at: www.sciencedirect.com

⁶ 'Emergent properties' is used in its 'weak sense' – that the properties of the system results are different from a simple aggregation of its constituent parts.