

Draft Cairngorms National Park Plan
Responses from individuals who have allowed their names to be disclosed

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Response to National Park Plan 2011-17. Mrs A.J. Angus, Darroch Den, Hawthorn Place, Ballater AB35 5QH. janeangus31@hotmail.co.uk 0133 97 56 260

It is unfortunate that the impression given by one's first look at this Plan is that this is from an outside-looking-in approach. Inevitably response to a legal requirement has to be objective, but in land management some involvement and a practical appreciation of other factors are needed if constructive activity is to be produced.

The paper on Landscape is an extreme example of uselessness except to a land salesman or copy writer. There is no apparent background of understanding or knowledge of what has made the hills, different bands of rock or the effect of these on the history, archaeology, farming practices or continuance or failure of these. No mention of the lists of names on the war memorials and the migration to towns. For once, I must admit that pictorial evidence is better for this type of paper, while photographs simply interrupt the ordinary CNPA website.

Moreover the failure to recognize that the bigger Cairngorms etc., hills are intrusions into the older rocks and therefore younger, rather than the other way round, show that attempts to help the admirable, able, honest staff who do not have basic scientific knowledge, have failed. If our previous comments on these matters have not 'got through' why should we bother to itemize matters which still, after years of effort, are ignored? We have offered but you have not listened. It is to be regretted that the Joint Nature Conservation Committee has been able to publish the recent and accessible local volumes to help with geological tourism so far and SNH has not apparently been prepared to press the case. Also the biodiversity position appears to be concerned only with a few more visible species. Both extremely rare and common species appear to be ignored, and while it is probably sensible not to draw attention to species with very few examples for fear of greedy and ultimately fatal collection, problems from cats, illnesses, disturbance and the unbalance of other species including raptors, corvids, bracken, hogweed, ragwort and other alien varieties, do not seem to be addressed in any practical manner at an early stage – even by organising help from volunteers. The recent report on the state of Mar Lodge deer has again shown that local opinion has been ignored to loss and failure in economics and biodiversity.

Only the large settlements are treated to a fuller analysis in business activity and details of addresses are frequently wrong e.g. Ballater does have an area set aside for commercial or industrial activity, there is no museum comparable to Granton's and many of the 200 small businesses might require more office space if there was better IT access and accommodation in the countryside. The statement made at a recent Aberdeenshire meeting that wireless IT would serve, ignores the need for direct line of sight in steep valleys as well as security concerns. Moreover the position of Ballater in tourism as 'access to Balmoral, Crathie and skiing' is ignored. On an other hand the shutting of the excellent new public lavatories in Granton, nearer the shops and with better parking than the older ones, has not been covered. Nor can an often hourly east-west public transport system for Ballater (with 2 hourly west to Braemar) really can be described as in the category 4, especially since the detour by Hill of Banchory adds another quarter of an hour to Aberdeen from Ballater and ends in the disgrace of the draughty new Aberdeen bus station.. There is no direct link south beyond Braemar or north at all. Local Post Offices and banks have had reduced hours and services and ASDA and TESCO vans proliferate. That the self-build project and another resident's search for a single plot have been stymied for at least a year, are examples of restricted growth in a recession and are as frightening as the EU preference for technical control rather than a flexible democracy.

One of the Aberdeenshire failures compared to the Highlands is the question of local affordable housing for local people – a point not covered in the 'research' section, any more than the question of water-extraction to supply the extensive proposals for coastal development. This approach was not favoured by local members in discussions at the Marr Area Forums some years ago and has had a deleterious effect on social as well as economic development. Local services are required if Ballater is to continue even if only as a retirement settlement and it is a vicious circle indeed if we cannot have

both work and shelter for our young people with small adjustments to regulations as they are at the moment. To live in a National Park with access to interesting country is more than compatible with work using IT. Apparently to fail to recognise and promote this, is more than depressing.

Commuting cannot be considered a sustainable proposition either to Inverness from Strathspey or on the A93 Upper Dee to Aberdeen without convenient rail or fast 'bus links. Off-shore work can place a considerable strain on family life, especially when the work is at a comparatively low wage level and both parents are busy and no further family support nearby. There is lip-service to the difference in culture, language, social links and transport links in the different straths, but inevitably there does not seem to be much concern about the weight towards an Inverness commuting area as opposed to the struggling upper glens in Aberdeenshire, Perth, Moray and Angus losing the native Doric population to homes for Aberdeen-oriented retirement or off-shore working, while most of the official work is in the western part of the designated area. It seems to be accepted that the Perthshire addition is simply 'access', and I am not sure how many other enquirers than I, have actually looked at this area for 'compare and contrast' in any field. I have yet to see any recognition of the work of the CCCG, now the AofCC, in maintaining some of the thrust carried on from the Working Party Report in continuing to enfold and maintain contacts with 'the periphery'.

The paper 2 on the Strategic Environmental Assessment is as aspirational as ever and as vague, without apparent reference to the EU, subsidies, epidemics, lack of local mechanical or scientific training, appreciation of the qualities of the population, etc. But if you chase away that local population with various obstructions you will lose the particular qualities you call 'special'. They include a reluctance to disputation, especially in public, a desire for peace between neighbours, and a willingness to put themselves about if others have made a good case and need help. If meetings were held in which opinions and suggestions came from the floor, which is what most of us understand is what 'bottom-up' means, it could surprise those, who at the moment, stand up to describe official policies. But I am not sure results would come in meetings of more than one or two until discretion and willingness to stick to agreements were firmly established on all sides.

The maps of types of forest include no assessment of the state of the Deeside Aspens, and only the Highland stands appear to be of interest on the Park web-site. This at least accepts what work can be done by local groups, but there is no list of potential projects or explanation of criteria for support of national or local concerns. Aspirations tend to the woolly, rather than practical or potential economic support in land management e.g. berry production, manufacture/storage/healthy eating, or damage from insects like heather beetle or ticks to tourism and local health. The area could well be useful in field trails, but apart from the successful mink project, on this side of the hill anyway, we have not heard of university participation. The agricultural monitoring project is interestingly practical, but so far I have not seen it mentioned in these documents.

National Park Plan 2011-17, Responses to Questions

Q1 The Cairngorms National Park is where I happen to live now and is as 'special' to me as the other 10 or so of the previous ones. It is, as everywhere else in Scotland, unique in each part with individual people and places.

Q2. As above – how do you really define 'special'? No

Q3. Any other 'special'.

Q4. Long term 'Outcomes' pp 12-22, should be updated and condensed.

Q5. Are the 10 Outcomes the right focus points? Bureaucrats have yet to prove they manage land effectively by setting targets. c.f. farmers' boots are the best dung.

Q6. Most important – to listen and give back our tax money to spend ourselves. You took over a mosaic which you designate as special, while 'National Outcomes' in recent times and other places have led to famine and erosion, counter-revolutions and emigration. See also Q5.

Q7. Outcome 1. p, 25< – influence of separation. A. More information, yes, but a far higher quality required

B. There is no detail of recruitment or much sign of understanding or knowledge of the local, especially rural, population's real concerns and cultures. Money, cost of equipment and training of local history societies or archiving that material has not had much practical support from the CNPA.

C – so could do better than relying on Counties.

D. You do not seem to have noticed what we have done, but persist in having these matters being picked over and over again so we do not have the energy or time to be practical ourselves.

E. I believe I shall say this again and again in this process – Processes are one thing, results should speak for themselves.

F. Better, but not the word 'try', just get on with it.

G. Data/results should be visible – but most importantly, are local people joining in? They did so in Ballater's own development of a Local History Society, but recovery and tourist benefit would improve with more interest in indexing and archiving which are tedious and/or expensive.

The use of the traditional cultures in entertainment would be more apparent, but again each strath has its own and there is not much time or effort available after a long day in catering or on the hill

Q8. Outcome 2 p.32< A. Height and climate are not themselves unique c.f. Moine Thrust western hills or Caithness in the north. Nor can everything in fact be connected. Calcic and basic soils are more or less in bands, rivers go down from heights to different straths, trees will not grow above the tree-line, people shop in certain towns, go to different hospitals.. ...

B.C The Deer Framework has now been shown to be not always sensible – local knowledge can help management, and it is more often more effective to listen to top level and mature scientists than fashionable theorists in trying out pilot schemes. It is tedious to repeat these things

D. Much the same as above : you have not listened

E No.

F. depends on economics, weather, interference from EU e.g. sheep and the EID system possibly losing the hefted sheep because of inefficient recording machines and lost tags over square miles of a holding. .. so that means no tick control as well as empty schools, loss of indigenous knowledge and culture, inability to look after retired people....etc did the CNPA put in an objection? Or LL&T? Small fields in both and further nitrogen spreading restrictions now suggested are adding to uncertainty for the same reason without a practical cause in this area.

G, Are you geared up for the health problem in the tick particular case? Contacted the GMA for visitors who need information on coming home with little red rings and a southern town GP?

Q. 9 Outcome 3. p 33<.- National Park straths look to their own lowlands.

- A. You spend time and effort on certain rare species while ignoring extremely rare and common ones. Yet there have been extraordinary reductions in some species and huge increases in others, e.g. corvids, pigeons, buzzards. I agree with keeping quiet about the very rare, though the disturbance of collecting seed for Svalbad does occur, but control of others does not seem to be a consideration even though there are impacts on, e.g. economic grouse and buzzards: ptarmigan and winter walking: wildcats, pine-martens and foxes and ground-nesting birds like capercaillie and other grouse species. I have not seen many garden birds round me all this year, though I am told that is a result of good feeding elsewhere. I could find no acorns.
- B. You do not include AofCC in those who might care to be involved either in information, propaganda or have offered help in using youthful or retired energy in pulling ragwort or trampling bracken, shooting pigeons or trapping the alien rabbits. Hares are being reduced though they are no more liable to spread ticks than rodents, Mustelidae or waterfowl. As far as I know, no research has been continued in Inverness on ticks or indeed Oxford on the heather-beetle. Aberdeen University did good work on practical removal of mink with local contacts and keepers to allow the return of water voles.
- C. You only notice the S.G.A. in relation to wild-life crime, though the members know the hills and relations to the low ground better than anyone else – which implies a strange opinion. Moreover the NFU and estates also have intimate knowledge whose members are often more than willing to share – if they have time and energy. These are the sources of the ‘bottom-up’ from whom officials and visitors are supposed to be so ready to learn. Someone with an academic degree in ecology who has yet to experience a Scots winter often has a great deal more to learn before they are as effective in helping or controlling visitor behaviour as a ranger.
- D. You might consider competitions in photography, stories, poems to help with deeper understanding, and reduce the collectors’ instinct. Field Studies should lead to actions rather than a vague dissertation.
- E. –G. Observation should not include disturbance of ground, species or the hard-pressed economy.

Q 10. Outcome 4. - ‘Wildness’ is not clearly defined. There are other individual spaces. You over-egg this pudding and pulling in visitors reduces ‘wildness’: e.g. the Galloway hills are not so high but have fewer humans and quieter areas on their equivalent granodiorites. I agree that walking is more difficult because the grass grows longer, though now there are so few deer in the Park Area, that also changes. Again, define, and reduce disturbance.

- A. Buildings can intrude, yes, but now it is lawful for people to go to most places as and when they want. Unfortunately, many have no more idea of how to behave about animals than the man who offered a boiled sweet to an exhausted seal on a jetty near our house on the Clyde after the Big Storm. Naturally it left - to the disgust of every child with their noses at the windows. The teaching materials offered to schools do not do more than issue edicts, rather than engage the empathy which could more easily rouse imagination and careful action.. I attended a school event recently when the visiting instructor said pigs were dirty, smelly animals and neither the polite knowledgeable children nor I corrected this misapprehension – we should have done so.

Land management has to be economic and depends to a large extent on markets and efficiency. Casual damage by ignorance has before now driven people from otherwise satisfactory holdings. Habitat as above. Your statements are aspirational. I have seen the actions of people who reckoned they now owned the National Trust land and so went where and when they pleased, disturbing the pattern of grazing deer, breaking drains etc., rather than being prepared to help. Controlling inexpert volunteers, teaching and keeping weary muscles going, is not something everyone can do, but the search for such people should have begun before now over the CNP

- perhaps among recently retired indigenes and ex-military c.f. Skills Force.
- B. The usual definition of 'wildness' is that it is country neither spoiled nor altered by *Homo non-sapiens*. Increasing tourism beyond this level is contra-indicated.
- C. as above
- D. as in Q9
- E. If I didn't have to deal with all this I might finish the pamphlet of 'geology from the car'
- F.. How does a group of children react to a visiting puppy or a group of young people tidy up after /during a hill picnic? Or set about observing a group of wild animals – marching up to them or asking for local knowledge first and waiting for their regular arrival in particular conditions?
- G. How long is a piece of string – are you discussing country time or a 5 year plan? The latter is far too short for the number of uncontrolled variables in any serious study.

Q.11 Outcome 5 help and support for land managers – one has to go through the whole lot of pages and diagrams before one follows your argument, so I accept your aspiration as virtuous and decline at this stage to accept it as necessary or helpful – tackling the detail as follows

- A. Not 100% satisfactory on public benefits – no business training for perpetual form filling, while the response of the Park officials at one meeting on the new CAP system showed a lack of understanding of farmers' problems, which was fully displayed in the next few years and again on the latest complications. The one increase in agricultural employment is secretarial and for smaller holdings the greatest increase in returns is from property - look at Skye housing - and is not available in the CNP with the present planning policies. I am not entirely against these, but if capital is available, there is not much point in misusing it. Where has been the marketing and/or storage of new crops for which we asked at the beginning? Only now starting. And our other request was for alleviation of drug addiction There are Training Courses, yes, but access to higher education does depend on schools and distances and they are varied over the counties and repayment policies.
- B. No
- C. Make more time? every manager and worker is hard at it anyway. Start with reform of the EU and CAP, reduce the official form-filling and increase clarity as a beginning. There is nothing like hard physical work to improve sleep quality, but that does not improve anxiety about finding time to operate flickering electricity for a small, slow computer with overdue subsidy applications. Most local machines do not have 42 inch screens. IT rates in some areas are 200k.
- D. Information could be conveyed via CCs and AofCC. These are not mentioned. Government officials can be helpful when asked, as are mobile libraries, schools and retired local knowledgeable people. I keep returning to the old Min of Ag. committee members and the College advisors. Is the CNPA helping to start machinery Rings, co-ordination of mass purchases and supplies and delivery? Education is not oriented to rural activity however 'eco' an approach and the presumption in rural housing has not been always for successive generations on the same holding with other businesses.
It is taking a very long time to spread and advertise Brands, particularly for small businesses.
- E. As above, targets and rural activity have to include, EU, Governments, markets, health, death and taxes.....
- G. Number of bankruptcies. Number of new businesses. Satisfaction within firms. Listen to the practical people and let them speak and act rather than perpetual 'initiatives and consultations' If they have survived so far they are competent. Remember 'there is nothing wanting in the Highlands but that some small amount of capital could provide ' Martin Martin 1703'.

Q12 Outcome 6 Aspiring again – splendid, but at the moment see above and not sure the complications of Counties and Planning are always helpful to develop small businesses and local training.

- A. Again no mention of the AofCC or CCs or smaller local business organizations, and the Reports are very light in discussion on the many small businesses, part-time and home-based ones. They need better IT, easier planning for expansion, faster branding, better education and local training and the CPNA should listen to their concerns if only to reduce unsustainable commuting. There does not seem to be a full recognition of the importance of free-lancing and the questions of extending the Brand are not always clear and obtainable quickly. Again, local knowledge does not seem to be of interest or use over village/town boundaries. There is no local abattoir on the western side. ASDA and TESCO vans are in Ballater most days.
- B. No, not really – on the basis of the details given in the various papers which are not always full or correct.
- C. mostly covered in A.
- D. suggestions above, though several questions include why do young people not want to stay – not all low wages at this stage in the recession as young people from Eastern Europe are still coming and being respected as hard workers with good English and work ethics. So is local training as in the Aviemore area successful?
- E.. Do they work?
- F. as above
- G. the presence of local markets, good shops, contented employees and busy free-lancers.

Q 13 Outcome 7. p 45< Settlements

- A. Many of the settlements are late, railway towns and the true old culture of the areas lies in the farms, smaller hamlets and the links between them. Emigration from the farms did not really become extreme until the late 19th century and after the Second World War when cultivation turned from the pair of horse to the Fergie tractor. Moreover the indigenous population not only has high ability, most of the schools expected as hard work as did the farm. The loss of school tied houses have in many cases brought teachers from towns who were of a different culture and did not always understand or respect the former one. Many of the settlements also depended on the feu-holder, often with reductions on capital from inheritance taxes and people wanted to avoid restrictions, whether or not of custom, from any implied authority. Opportunities increased after The Forties Field developed. Rapid increases in housing and newcomers have meant considerable changes in culture and people. This can take 10 to 20 years to resolve under the best of circumstances, and is this instance the loss of the railway and the need for higher training has not helped the out-lying upper glens. Also, while Highland Region continues to allow an increase in ‘points’ for applicants for Social Housing who wish to stay in the same community, Aberdeenshire is now increasing pressure to use the ‘general’ list as only a single opportunity. We need to make some allowances for the social benefit of e.g. grand-parent baby-sitting and elderly informal family care. But the County policy has now turned to coastal development.
- B. No, as above, especially cultural heritage and planned villages.
- C. Improve schools, IT, local training, localise wider medical services, listening – not mostly your business.
- D. Persuade the county, CPNA officials and board members to listen to ‘the bottom’.
- E/F/G. we do realize there isn’t cash and in the meantime we wait, economise and pray.

Q 14. Outcome 8 p< 32 Quality and connectivity of habitat, Low Carbon

A. Habitat: not always possible to connect as above – depends on rock, climate/height, transport links and comparative economics. Fashions and belief come into the equation also. c.f Scottish National Trust and deer. The foundation of modern productivity is mobile energy from engines, rather than a squad of people pulling and pushing. Reducing CO2 release can bring greater human financial cost and in the end, greater production of CO2 from the greater number of people. The other possible alternative is reduction in total human numbers

B/C, so listen to local knowledge before jumping in at the deep end. Yes, educate our masters, and if buying advice go to the highest quality, especially in science, rather than generalized enthusiasts, remembering that this area is, like everywhere else in Scotland, unique. Local experience cannot be found elsewhere

D, We are becoming rather tired of repeating ourselves...there is local knowledge if you want it

E. I like apple pie too but not every day – depends on the basic rock.....

F. Tackle the EU and too many regulations, one step at a time, remember trees are for grandchildren.

G. There will still be hefted sheep and the same names in the farms: better hazardous insects control.

Q. 15, Outcome 9. p 51<

Community empowerment - am in favour, as above ,and stop *H. non-sapiens* being inclined to spread fires in old hollows and shelters . etc. Index all archives.

Sustainable Communities..- better education, training, medical services with ambulances, 24 hour Services properly organized, physios, local health visitors and midwifery with more time, reliable and secure IT even on old lines, locally run van shopping with IT, cheaper fuel and public transport might be some good approaches and keep young people from moving to housing in towns to work

A. It always takes at least ten years for all newcomers to become fully involved. I appreciate the attempt to bring in all the communities to the AofCC, but pushing in several directions at once has not yet allowed that organization again to become fully coherent and prepared to do the important pushing back. Giving informative talks is not always the same thing as listening. Your statement does imply a perfect world, but we do not live in one.

B. No, human nature and economics are against you in this and for CCs you have neither changed provision of personnel and cash from counties of CCs’ – Capital, facilities, education, transport and the provision of social housing are not under your control nor likely to be.

C. Co-operatives of different varieties might help.

D. CCs might, individuals might – if we did not have to respond to all these forms or you checked back to see what we said before 1993? 1999? 2004? 2006 ?time and tide wait for no ...

E. CCs all had aspirations once... ‘hope deferreth maketh the heart sick’. Need for capital.

F. Imagination, freedom and time - listening to locals.

G. Incremental....

6

Q16, Outcome 10 p 52< I am now wondering about the use of the word 'appropriate'. Yes it fits the requirement of the Third Aim – on recreation

A. So this Third Aim has always seemed to be in conflict with the First (Conservation) as well as the Fourth (Economic and Social Development) sometimes, On health, yes, fresh air and moderate exercise are recognized as Good Things and for less able and elderly people, neat paths are a help, so numbers of Core Paths keep people in tougher ground and sometimes away from farm livestock which is again Good for dog-walkers... But what about this 'wildness'? Listening to the indigenous and the long-term admirers of the area who did not want their 'special place' changed? Managing the developments from the Right to Roam was always going to be difficult and the early response to the Parliamentary Working Party Report activity **was** making a difference in help with mutual understanding without much public expense. I am almost sure that the extra legal requirements of the National Parks Act have not provided an comparable level of public benefit, though in Ballater that should have come from near-by help and access to planners. It is unfortunate that the reluctance of some residents to accept the Reporter's opinion that any mixed expansion should be to the east, has divided local coherence..

Any extension of the path-ways should not be at the expense of farming, game-management, or wild-life. Disturbance must be observed and kept at a low level, particularly in mating, breeding and developing seasons and in times of scarcity like winter and spring. Education of visitors should be improved and extensive in relation to the original occupants, human or not .

B/C. No, and you do not consider the need for activity to continue even in foul weather and cold – Indoor recreational facilities should be as generous as in the Continent for winter, health and tourism, but would be more expensive than using heavy plastic and blowers as we have to cope with the weight of snow. Flood-lighting would reduce the 'dark-sky' qualities of the area, though careful use need not be too expensive or carbon extravagant.

You do not include possible help from AofCC: CBC: Schools: sports clubs: GPs (the Ballater Practice had an exercise group before 1996) : local knowledge: dance groups: VisitScotland, smaller business groups.....local entrepreneurs?

D. Cycling is contra- indicated for half of women over 50 and a third of men because of the present rate of osteoporosis – the incidence of which is reduced by habitual exercise.

E. Well, more is better than less but conservation is still the First Aim and tourists do like observation. Are you prepared for the cost of education and preservation for both animal and vegetation and your care of geological sites while replanting of trees and waterways retention get in the way of access/ avoidance of damage. Balancing is always difficult on a tight-rope.

F/G observation: common- sense.

Q 17: pp 57-82 managing land-use Strategy

Planning key principles : p58 Planning butters no parsnips- do you mean to help practical people?
Yes

Q 18 If not, why? So far I do not hear of much practicality. Removing plastic waste: some training: farmer monitors: reducing feet-erosion: increasing water-voles Yes, all good and sensible But fencing reduces your 'wildness'. Ticks: heather beetles: visitor behaviour: more or less as before. There is still no prospect of a near-by abattoir on the east side to improve sustainable local supply. Nothing much on alien vegetation, though it is not impossible – there is a glen just outside the Park where there is not one dot of yellow ragwort – because they keep horses. Even after our local meeting with VisitScotland of which we all had such hopes, their website people had to be chivvied by individuals before mistakes were corrected and more has to be done to make them apparently 'go local' on events and activities. The EU, UK and Scots administrations plunge into more expense and less understanding of conditions apparently without a cheep from the CNPA.. I have still to see a full understanding of the effects of basic sciences throughout the management and changes in staffing still do not quickly achieve an understanding of the unique culture and people of the area or contacts with them.

Q 19. More or less in agreement with the opportunities and threats, but you are not giving much of an impression of going for the one or dealing with the other.

Q .20 I am not clear if 'throwing your heart over' or 'going for goal' comes into official training.

Q.21, A. I do not find myself in sympathy with 'landscape character' usage. As a geologist with an archaeological interest from a farming background, when I look at the earth with thoughts of opportunities and threats, productivity or risks, concerns on economics and humanity are equally valid. Also I can be as content with the hydrology of a burn busy eroding, transporting and depositing in the wildness of natural processes, as on an isolated top, but understand the questions of those who look for solitude in 'Nature'. I accept that wildness and humanity are contra-indicated. Time and space to 'stand and stare' are valuable, as is the confidence required to take a map and compass for a wet walk. Commercial game shooting and stalking gave us the recent mosaic on particular ground. CAP regulations and inheritance taxes continue with altering pressures, while to avoid modern developments or the need to replace capital is asking for a collapsed system – nevertheless, my generation has seen too many countries suffer the results of short-term political views and fashionable theories rather than long-term generational prospects and practical applications.

B. Freedom, increased capital retention and the Parliamentary Working Party Report as put into practice before the interruption of the National Parks Act, could work pretty well. I would prefer to see that again but would accept the National Will if I was sure the nation knew what it wanted in the long term. However, in the meantime what about going back to Single-Member Wards with yes/no voting rather than Proportional Representation and improved voting to allow BFPO votes to reach the voting stations in time? Could Aberdeenshire and Highland not send them out at the beginning rather than end of the list?

22, Biodiversity :- Why not try common sense and monitoring to allow checking to see how common species are doing? Ignore 'National Guidelines guidelines' and stick to the former local facts with a proper local comparison.

23. Again, stop thinking always about Policy and do what is reasonable and economic for the grandchildren . And remember there are Aspens in the eastern section too.

24 Consider lowering built-up riverbeds in short half-across sections from the top down over many years to avoid rivers doing what comes naturally over flood-plains. (Depositing what has been eroded} Preferably in low water. That might save some of the buildings on flood-plains while confining water within the present banks.

25. Improve insulation and cheaper, quicker, planning – even though early discussion does help - : shop locally or with local vans: increase home-working with faster and reliable IT : turn-table at Dalwhinnie and express small buses on Dee-and Don-sides.

26. Why/how/what accept limits – or kill the thing you love?

27. management : Listen and do not get in the way.

28. Improve the A 93: keep shops by helping home working: better IT: good local schools : distance learning with local tutors and groups: reduce petrol taxes for rural expense and improve capital allowances for things like greenhouses and chill-storage, as well as that local abattoir..... local houses for local people.....

CNPA

My Response and Submission to the Consultation on the CNP Plan 2012-2017:

Led by the Prime Minister, the UK Government is placing its focus on "general wellbeing" as the way of measuring our progress towards genuine prosperity. This is to be in place of "sustainable economic growth" as the measurement.

The Park Plan for the 5 years to 2017 will be very deficient if it does not have this focus on general wellbeing - despite such not (yet) being a requirement by the Scottish Executive (Government) on the CNPA.

The final Park Plan should certainly feature the words "general wellbeing" of the residents of the Park. And the final Park Plan should lower the focus on "sustainable economic growth".

Thanks.

David A Lyle

THE CAIRNGORMS NATIONAL PARK PLAN 2012-20...

Individual Participant

Question 01 What makes the National Park Special to you?

A National Park should be a place where nature should be placed above other themes, where wildlife can have a chance to increase and where people can have a good life in symbiosis with nature.

Question 02 Do you agree with these descriptions of the special qualities?

YES

Question 03 Are there other special qualities you think should be explicitly identified in the National Park Plan?

The respondent skipped this question.

Question 04 Do you think the long-term outcomes should be updated and condensed? If so, how?

Yes it should be updated.

Especially the sector Sustainable economy. There is no description of what is meant by a Sustainable economy. For me it should always be in harmony with nature and the landscape. 13. is about housing. Again the word sustainable is used now for housing. But nothing with no explanation by what is meant by it. It should be that all new house should be build according to LOW ENERGY standards. As example the housing scheme that was set up in Inverness: houses with heath-pumps, heath recycling and so on.

16. Renewable energy. I don't think that renewable energy is an aim for a National Park. Unless it is about reforestation and even then it depends on what kind of reforestation, it should be natural reforestation and even then the life time of the trees should be much longer than the current life time. Most trees are harvested much too early. Little renewable energy schemes can go on, if there is no impact on landscape and nature including wildlife.

Question 05 Do you agree this set of outcomes provides the right focus for the next five years? If not, what else is more important?

The respondent skipped this question.

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Question

06

Which are the most important outcomes to you?

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

Question

07

Please start your answer with the appropriate letter, for example: A)

A. Like the rest of this plan, most words don't mean anything. Nothing is clear, you have to guess what is meant.

E Do you agree with the indicators and targets suggested for this outcome?
It would have been very helpful to have an idea by what you mean with "the financial contributions made by visitors towards caring for the Park's special qualities" and this with an increase of 100%.

As a tourist nature guide I can tell you that it is very hard to obtain an income in the National Park and if you mean financial contributions from tourists visiting to the National Park then I think me and other organisations will move out of the National Park, already at this moment at least 3 companies who are based in the National Park and organise guided nature tours are spending more time outside the National Park than inside.

Question

08

Please start your answer with the appropriate letter, for example: A)

A Do you agree that five-year outcome 2 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?

NO

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

YES, the first point should be: •increased native woodland establishment and NATURAL forest cover. In the sector packages it should say: landscape scale habitat enhancement programme that identifies opportunities for NATURAL woodland and wetland....

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?

A 5% increase is a very low target, should be 10%, but if you are trying for natural regeneration there is no prediction of the increase that you can target. You can target areas where natural regeneration should take place and where that measurements will take place like deer control or fencing out with low grazing of cattle to open the soil.

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

See E

Question

09

Please start your answer with the appropriate letter, for example: A)

A Do you agree that five-year outcome 3 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? These are intentions, it is not a plan there is not much concrete in it, neither in the rest of this Plan.

Question

10

Please start your answer with the appropriate letter, for example: A)

A Do you agree that five-year outcome 4 is an appropriate one for this National Park Plan to

2017?

YES, it should be the first and most important outcome

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

No, What is f.i." including the removal of redundant or abandoned infrastructure" I don't hope this includes abandoned farms because they are a testimony of the culture of the NP. The last point "People will continue to be able to experience wildness throughout the Park" is even not a package it should be a result of a package.

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

YES; The woodland expansion should be NATIVE and NATURAL woodland expansion. Plantation decrease the outcome of Wildness.

All plantations should have a conversion plan in making them more NATURAL looking. All non-native woodland should be removed asap.

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

YES. 1. Removal of 20% of all non-native woodland

2. Conversion of plantations into more Natural looking woodland: - 20%

Question

11

Please start your answer with the appropriate letter, for example:

A)

A Do you agree that five-year outcome 5 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?

Grants and Public benefits should be linked to results. If no result than no full Public Benefit or Grant should be given

Question

12

Please start your answer with the appropriate letter, for example:

A)

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

It could be, but some sectors as forestry with plantations and wild game have also a negative effect on tourism. Game estates especially are a negative factor on tourism.

Question

13

Please start your answer with the appropriate letter, for example:

A)

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

It is again all very vague. It should be an appropriate one but in the past I haven't seen much off it.

I saw house build in Aviemore on the other side off the A9 in birchwoodland, I saw a new development in Kincaig in woodland and they are even called Ecological housings. I saw house appearing in lot of places, not connected to waste water systems outside of villages so extra transport costs and bigger ecological footprints for infrastructure, waste water pipelines, electricity power lines. New housing should be restricted to villages and there should be a balance between new housing schemes and employment. For the moment new houses are build without there be employment in the region, which causes more traffic on the roads.

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

Question

14

Please start your answer with the appropriate letter, for example:

A)

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?

NO

C Are there any better packages of work that would deliver the outcome?
YES; The biggest result in a lower carbon emissions would be achieved in new building standards, with heath recuperation and warmth exchanging pumps + reforestation but then of course with native and natural woodland.
To increase transport by cycle, you should first have cycle paths. For the moment you must be suicidal to cycle from one village to another. A few exceptions there like between Newtonmore and Kingussie, but again try to do that in winter when it is icing and snowing. They are never cleared from snow. During snow often the snow from the roads is placed on the footpaths.

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?
No, the 3th item should be increase in number of cycle paths see also C

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

Question
15

**Please start your answer with the appropriate letter, for example:
A)**

A Do you agree that five-year outcome 9 is an appropriate one for this National Park Plan to 2017?
Only if everything is in the frame work of the National Park. Local initiatives shouldn't go against it.

Question
16

**Please start your answer with the appropriate letter, for example:
A)**

A Do you agree that five-year outcome 10 is an appropriate one for this National Park Plan to 2017?
YES, but nature related recreation isn't even mentioned. I think for example birdwatching.

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?
Yes- Far example, there is no were an accessible place to watch Golden Eagles or Capercailles or Black grouse. As example a hide for watching Capercaille would attract more visitors, did could be done by building another higher level on the existing hide for the Ospreys in Boat of Garten.

Question
17

Do you agree with the key principle?

Yes

No

Question
18

If not, why?

The respondent skipped this question.

Question
19

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

Do you agree with the opportunities and threats identified, if not why?
In Urban: New Developments are or can be more a threat than an opportunity

Woodland

- Reduced profitability of commercial forestry replanted with native species. This is not a threat it is a result of a positive measurement. Problem can be solved with grants
- Rivers, lochs, wetlands and floodplain
- For water and Farmland a major threat is the inappropriate use of manure, this is often put on the land out of season, even on snow and frozen land, which causes nitrate and phosphor pollution in the rivers, because the nutrients are not taken up by the vegetation outside the growing season and on frozen land it will wash away into the river .

Question
20

What are the particular opportunities and threats that you think the Plan should address between 2012-17?

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

*Opportunities

Woodland

- The possibility of changing plantation of exotic woodland species to native natural woodland

*Threats

1. Mountains, moor and heathland

- Inappropriate grazing by stock or wild mammals can adversely affect habitat condition; fail to maximise carbon sequestration; and increase risks of flooding downstream and slope erosion
- Reduced sense of wildness as a result of visual impact of development
- Inappropriate muirburn damaging sensitive habitats and species, and increasing vulnerability to erosion, it causes also extra Carbon dioxide in the air

•Reduced diversity of iconic species (eg raptors, mountain hares) as a result of trend towards intensive single-species management

- Recreational disturbance to key iconic species

2. Woodland

- Further fragmentation of native and ancient woodland sites
- Recreational disturbance to key iconic species

3. Semi-natural grassland

- Loss of species diversity by reseeding and fertilising

Question
21

Please start your answer with the appropriate letter, for example: A)

The respondent skipped this question.

Question
22

Please start your answer with the appropriate letter, for example: A)

A Do you agree with the proposed approach?

One shouldn't focus on designated sites . The Natura 2000 directives handle habitats and species in or outside an designated area. Even if Scotland didn't designate all the appropriated habitat areas still all habitats and species mentioned in the different directives are still protected. That is why your second point is very important

B Would you suggest a different or additional policy approach?

See A + In the last implication is mentioned:

"this should include action to address unacceptable levels of wildlife crime". Are you suggesting that there are acceptable levels of wildlife crime? Please delete unacceptable levels

Question
23

Please start your answer with the appropriate letter, for example: A)

A Do you agree with the proposed approach?
Not at all. A NP is not there to promote productive woodland but to promote natural native woodland. And of course also natural native woodland has economical benefits.
B Would you suggest a different or additional policy approach?
Yes. Expand present woodland cover with 50% of wich 30% Natural Native Woodland and 20% productive native woodlands (plantations of native trees). The NP should also promote regulations on how trees are planted and especially harvested. At the moment the soil is ruined after every exploitation.

Question
24

**Please start your answer with the appropriate letter, for example:
A)**

A Do you agree with the proposed approach?
Yes

Question
25

**Please start your answer with the appropriate letter, for example:
A)**

A Do you agree with the proposed approach?
Yes
B Would you suggest a different or additional policy approach?
Yes,
*Make or encourage to make regulations that new build houses are build to low carbon emissions standards. Insulation, heath regeneration, solar panels, heath pumps.
*No, new developments requires extra transport. It is useless to build new house if there isn't work in the area because they have to go to Inverness or an other city to work. New housing developments should follow the employment opportunities. Also new housings away from villages create more transport (even to go to the shops).

Question
26

**Please start your answer with the appropriate letter, for example:
A)**

B Would you suggest a different or additional policy approach?
There should be more focus on people who are interested in nature and wildlife. Examples. There is a beautiful spot to watch Slavonia Grebe at Advielochan but no access, yes you can walk to the loch but there is nowhere to park. Result people go to Loch Ruthven. There is no place where you can watch Golden Eagles without walking over long distances. Result people go to Coinafearn.

Question
27

**Please start your answer with the appropriate letter, for example:
A)**

A Do you agree with the proposed approach?
Yes
B Would you suggest a different or additional policy approach?
Public benefits should be linked to results.

Question
28

**Please start your answer with the appropriate letter, for example:
A)**

A Do you agree with the proposed approach?
Not for further developments without a need. A plan like an Camas Mor should be only the result of an economic demand - because there is a demand for workers there has to be another development. And not to build another development and to try to increase the employment.

B Would you suggest a different or additional policy approach?
See answer to question 25 and previous.

Question
29

Your comments

It is very hard to read the document. I think everything should be made much clearer and written in a much easier language.

Question
30

Please enter your name:

Jozef Leestmans

Question
31

Please enter your address:

GOWDENSTANE, NEWTONMORE ROAD, KINGUSSIE, PH21 1HE

Question
32

Please enter your telephone number:

011 44 1540 661944
Kingussie
United Kingdom
Fixed

Question
33

Please enter your e-mail address:

jefleestmans@gmail.com

Question
34

Please tick one:

I am responding as an individual

I am responding as a group/organisation

Question
35

An acknowledgment will be sent to this address soon after the end of the consultation period. Are you happy to receive future correspondence by email?

Yes

No

Question
36

Do you agree to your response being made available to the public (via publications and our website www.cairngorms.co.uk)

Yes

No

Question

37

Where confidentiality is not requested, we will make your responses available to the public on the following basis. Please select one of the following options:

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

Question

38

The name and addresses of your organisation will be made available to the public (in publications and/or on our website www.cairngorms.co.uk). Are you content for your response to be made available?

The respondent skipped this question.

Kenneth McKay

I am grateful for the opportunity for the opportunity to comment on the draft Plan.

The main point that I want to make is a general one which relates to the planning regime that should apply to proposed developments in or close to existing settlements in the National Park.

Frankly, I think that a very bad mistake was made in including existing towns and villages such as Grantown on Spey, Carrbridge and Aviemore within the boundary of the National Park; it is an insult to those who live and work in those settlements to regard them and to treat them as being in a "park".

It is especially absurd and unacceptable to the vast majority of those who live within those settlements to apply National Park planning considerations such as conserving and enhancing the natural heritage to proposed developments within the places they live and work in.

While even I would hesitate about building houses around Loch Morlich, the idea that the first aim of the National Park legislation should apply - and often be by far the main consideration - to proposed developments within existing settlements is ludicrous - and a matter which results in very real anger amongst local communities about many National Park Authority decisions. Refusal of badly needed housing developments and threats to the badly needed larger Tesco store in Aviemore because of birds and insects are cases in point!

Ideally, the boundaries of the National Park should be re-drawn to exclude existing settlements, but, recognising that the boundaries are unlikely to be altered in the foreseeable future, I think that:-

- **the 2012-2017 Park Plan should state quite clearly that, as regards proposed developments within or close to existing settlements, the over-riding consideration should be social and economic development and that natural heritage considerations should play little or ideally no part in the consideration. In short, I think that the priority of the National Park aims 1 and 4 should be reversed when it comes to proposed developments in or close to existing settlements. Failing that, I believe that there will be increased pressure from local communities for all the existing settlements within the National Park to be removed from within its boundary.**

CPNA should be falling over itself to approve as many wind farms as possible. If even 100 large wind farms were sited within the National Park they would be but a pin prick on the vast Park area. Proposed outcome 4 panders to environmental zealots rather than accepting the reality of the threat from global warming. I therefore believe that:-

- **Proposed outcome 4 is totally misconceived and should be removed from the final Park Plan.**

K W McKay CBE
The Lodge
Easter Duthil
Carrbridge
PH23 3ND

A response to the Cairngorms National Park Plan from Ni Bullivant.

1. The Cairngorms National Park is special because it is a large, inspiring mountain massif, covered and surrounded by some of the finest of Britain's wildlife habitats and unspoiled inhabited straths and glens.

The Cairngorms have a high degree of authenticity, being intrinsically of very high landscape, environmental and recreational quality. Artificial enhancement (or 'development') is not necessary.

The Cairngorms present an ideal against which other places are compared. It is an extreme, not a step on the way to anywhere else.

The Cairngorms National Park was one of the pioneer National Parks in Scotland that broke the fifty-year wait. The "Four objectives" pursued set the standard for all public authorities. They are ideals that any authority would be proud to uphold.

The Cairngorms National Park set the standard, on designation, for working with communities towards a common goal, exemplified by the direct elections to the Board.

2. The statement of special qualities (p 13) has the correct general idea, but there are some expressions in the document I would comment upon:

The pine forest is native, it is semi-natural, not semi-native.

The rivers are important, rather than the fact that the headwaters are included, and it is insignificant (and unlikely) that the upper catchments provide water to major populations downstream. If the rivers are to be mentioned in this context, reference should be made to the largest basin mire in the North, the relatively natural state of the rivers and the important fauna of the rivers and floodplains.

I cannot speak for skiing, though three of the five Scottish ski centres is a major contribution, but I feel your statement about mountaineering is an exaggeration. The Cairngorms represent a very important element of the culture of Scottish mountaineering, but to claim a central position is to overlook the importance of Lochaber, Glencoe and Skye, which does not strengthen the case being made. However, the case for other recreation could be stated more strongly, because the Cairngorms are a highly valued and popular destination for adventure sports and outdoor activity (which I take to include wildlife-watching and photography).

Landscape qualities (p 14) Authors have sometimes got a bit carried away with enthusiasm. I would agree that the mountains are magnificent, but "towering over" is what happens with really steep mountains such as Blaven and An Teallach. The Cairngorms do not tower, they rest back beyond miles of intervening moorland and forest. This is part of the quality of the Cairngorms that can be enjoyed. The quiet presence of the mountains in many of the low ground landscapes is a unifying factor, in good weather.

I can agree with the mountains giving an awe-inspiring sense of great spaciousness, and on a scale greater than anywhere else in these islands, but again, I feel the term vast is not justified when one has seen America, Australia or even Iceland. The height of these mountains is actually quite modest. It is the fact that they are high enough to bring about sub-arctic conditions in this temperate country

that exalts their status, not the raw size of them. It is not appropriate for us to be comparing size statistics when they are easily beaten.

A harmony of complicated curves is an appealing term, but reading this as a mathematician and geomorphologist, "complicated curves" doesn't ring true. There are many curves (simple curves), and some straight lines and rough slopes, too. There are also places where abrupt changes of slope interrupt the skylines. "A complicated harmony of curves" would be nearer the mark.

The last item "Landscapes both cultural and natural" is very weak in my view. What is it actually saying? Landscapes on a continuous spectrum from entirely man-made to entirely natural, or landscapes where cultural elements can be seen and ones where they cannot? Any why is this special about the Cairngorms and not, for instance, Fife?

Moving on to Table 2.1, there is varying quality in the items chosen for listing. I agree strongly with the listing of the unifying presence of the central mountains and their imposing and strong dramatic character. I would reword the third item to read "The extensive plateaux contrasting sharply with intensely eroded and dramatic glacial landforms, which are almost unique in the world". The significance (or qualities) of the item "The surrounding hills" is not clear to me. The remaining three items are well-chosen and expressed.

Glens and straths includes the item "Steep glens, high passes", bringing to mind a Himalayan landscape. Our glens and straths are very smooth and gentle in gradient. The only steepness is at some of the sides of the glens, particularly in the intensely-eroded central massif. The passes are long through-glens which rise very gently to fairly flat passes. Though they are of fairly significant altitude in British terms, it is the length and remoteness, and the degree of exposure and difficulty they presented to early travellers which makes them nationally significant.

The broad farmed straths mentioned could also give a nod to the significant amount of woodland interspersed on the margins of the farmland.

I can relate to "venerable" as a landscape term, but not "renowned". One term is a reaction to the visible natural qualities, the other to an appreciation of the cultural qualities, accessible to a minority. There are other qualities of the rivers more worth mentioning, such as their size, the power and variability of the flow and the extent to which they dominate great areas of ground when they flood.

As with surrounding hills, "Beautiful lochs" is a weak item. In an inland landscape, lochs provide contrast of reflectivity (colour) and texture, making them stand out. The Cairngorms lochs are generally small and usually partly-hidden among surrounding hills, and views are framed by trees. They are also very variable features, reflecting the weather and sometimes the season.

I agree with "Layers of receding ridge lines" and "Grand panoramas and framed views". The "landscape of many colours" is another rather meaningless item, not particularly relevant to the Cairngorms more than the rest of the Highlands, and certainly less than places with hard, bright sunlight such as Spain or Mexico. Perhaps it would be more accurate to describe "A landscape of many muted colours", though I don't think the Cairngorms is unusual in Scottish terms.

Dark skies. I take it you mean at night. It could be read as dark clouds.

The other items are ones I would agree with. I'm too near the Cairngorms to understand the item "Spirituality", but if it means "uplifting in anticipation and on reflection", I would agree strongly. There are one or two hills where some spiritual cult visits because of the "energy" they channel, but most mountaineers have been doing that on all hills for much longer without making a religion of it.

On reflection, this section on the landscape qualities is welcome, because it highlights the importance of this neglected attribute of the Cairngorms. I have partly-completed a photographic study of the landscape of the Cairngorms, but a publisher responded to me indicating that for them (and their understanding of their market), the main thing about the Cairngorms was the wildlife, not the landscape.

However, I'm not sure that the preamble to the National Park Plan is the right place to redress any imbalance in the public perception of the importance of landscape in comparison to other groups of qualities. The variable quality of the work quoted gives it the air of a publicity campaign rather than a dispassionate assessment of qualities that need to be safeguarded.

There is not, for balance, a catalogue of the Special Biodiversity, Geodiversity or Recreational Qualities that need to be taken into account.

3. Additional qualities worthy of mention include the climate. This is the most inland part of the Highlands where winter has greatest influence, and the climate of the mountains constantly influences the climate of the glens.

This in turn influences the light, which is an inspiration leading to so many photographers working here.

Strategic objective1

The National Park is not only a place where good things happen, as implied by the first Strategic Objective, but is known to be so by all who work and recreate in the National Park, and all other people in Scotland, as a national icon of which all can be proud.

This is sufficiently strategic to appear here, and distinct from objectives 2 and 3 as to be either a sub-clause of 1, so an amplification of it, or a separate strategic objective in its own right.

I feel this is necessary, because it is worthy of the CNPA and residents to beaver away at objective 1, but to continue to gain support and funding, everyone else has to be carried along with the enthusiasm.

Firstly, there must be no demotion of the status of the National Park to merely a Park, of which there are thousands in Scotland. It is a National Park, and should be referred to as such at all times. This is already standard practice with National Nature Reserves and National Scenic Areas. To omit the adjective from any of these would be seen as a demotion. The adjective National should always be used when referring to the National Park.

Secondly, the good things must not only happen, they must be publicised. The publicity will help the other strategic objectives but must be carried out sensitively in line with the purposes of the main objective. The National Park needs energetic ambassadors of the calibre of Cameron McNeish and

Peter Cairns to make regular contributions to what people are absorbing through the media about the Cairngorms.

A feeling of national pride in the National Park also requires a strong approval rating for the National Park Authority. Although the Authority has rightly – in my view – emphasised the role of all other supporters in the National Park, its own role should develop as a leader and cheer-leader for the efforts of all partners.

Strategic objective 4

I feel that there should be something in the strategic objectives about enhancing understanding of the Cairngorms and of wild ecosystems and places in general. I don't think this is included in the outstanding visitor experience objective, and in a way is independent of it, as the National Park has a national responsibility for this, not just to visitors.

This could be a very useful peg on which to hang the declared intention to increase the amount of volunteering, and the expansion of the John Muir Award scheme.

4. If following through on my comments on Strategic Objective 1 and proposed Strategic Objective 4, there is unlikely to be any scope to prune the long-term objectives of the National Park Plan.

Summary of Progress to Date.

The National Park Authority can be proud to have one of the most active and responsive Outdoor Access Forums in Scotland, and this should be acknowledged in the table on page 21. I have personal experience of the approach of the Authority towards its LOAF, and this contrasts favourably with the approach of other authorities.

5. Yes – agree.

6. As a Ranger and resident they are all important, but my priority is with outcomes 1, 3, 4, and 10.

7. B I welcome the listing (3) of a Cairngorms volunteering programme and I am keen to support this. I also support (6) learning resource materials and (7) web-based research hub.

7 C I am concerned that Ranger Services require strengthening to support this outcome, but the tendency is for depletion and at best stasis.

7 D Add Ranger Services to the list of Who for (3) and (6). Cairngorm Mountain possesses a wealth of information regularly requested by researchers relevant to (7).

7 E The targets listed require a baseline, and as far as I am aware, this is not available for school children using the National Park through the Curriculum for Excellence nor the number of volunteer days. For these indicators, it would be preferable to set a value, estimated by reference to schools, Ranger Services and other visitor attractions such as the Highland Wildlife Park.

G Cairngorm Mountain can provide data for improved estimates of numbers of school children and students using the resource, and for numbers of volunteer days.

9. A This is an important concept, but I am not convinced that all readers will have the same understanding of what wildness means. For instance, I would consider that the first benefit “CNP will remain an important and accessible place for people to experience wildness” is slightly self-contradictory. This outcome could benefit from further discussion with John Muir Trust, Mountaineering Council of Scotland and academics to tease out what is being enhanced by the outcome. When this is more carefully defined, the benefits can be described and a programme of work devised.

9 B Development has connotations of official development requiring planning permission, but many forms of development fall below this level. Estates, estate staff and individual hill-goers need to have a clearer understanding of the sorts of development and activity that can impact on wildness characteristics. This could be developed through training and awareness-raising.

9 C Activity is a large and important enough factor to merit a separate listing. There are particular issues with the use of land-based vehicles, irresponsible recreation, low-flying aircraft and irresponsible muirburn. All these activities are not covered by the proposed delivery mechanisms, and have the capacity to reduce wildness significantly.

Examples include: Skidoo expeditions across the hills, broad-scale scarring of arctic plateaux by wheeled vehicles in soft conditions, and the creation of new tracks by incremental damage caused by quad bikes; uncontrolled dogs, building of memorials, cairns and shelters, irresponsible mountain biking and inappropriately large party sizes; low-flying jets and inappropriately-located low-flying helicopter exercises; unnecessarily heavy and widespread muirburn and muirburn that extends up onto crags and arctic heaths.

Additional work required includes awareness-raising and training and an expectation by those taking recreation that estate staff and Ranger Services will raise issues of wilderness-harming activity with them, with a view to minimising this activity.

The National Park could be the catalyst for a re-wilding programme, to include artefact removal, restoration of damaged ground and to draw up a code of practice with land managers for use of vehicles, muirburn and artefact removal. A parallel stream of activity in awareness-raising among recreationists would also assist. Finally, promotion of legislation removing low-flying training from National Parks in Scotland would be required.

9 D Ranger services are well-placed to work with recreationists to minimise wilderness-harming activity, indeed, the Cairngorm Snow White facility is an innovative approach to this area of work. Cairngorm Mountain Limited already has a list of Man-made Objects present on Cairngorm Estate, which was suggested as a precursor to taking action on this topic by the Cairngorms Partnership Management Plan. To my knowledge it has not been repeated by any other estate.

9E The target is weak because the assessment method is not defined.

9F The length of vehicle tracks assessed by satellite photographs, the number of low-flying sorties in the National Park, the number of cairns and other shelters removed, the length of old fences removed, the number of incidents of irresponsible muirburn as assessed by satellite photography.

16 C There is a need to develop public transport to support the Outcome 10.

16 D CML has promoted public transport to Cairngorm in a partnership with Rapson's Country buses. This scheme is not active at present. Cairngorm Mountain Limited is actively pursuing this Outcome through the provision of guided walks with a Ranger, or guide, especially the Walks at the Top of the railway.

16 E The indicators are on the right lines, but may need specifying more closely. For instance, is the first referring only to residents, or to residents and visitors? The target "To increase by more than the national increase" is dependant on how that is measured. The target of the second indicator is likewise. Considering the size of the National Park, and the long travel to work distances, I think this target is too ambitious. Add to this indicator "and school". This is an area where great improvements could be made in villages with schools.

16 F I would like to see an indicator about the provision and take-up of public transport in the National Park.

17 Yes, agree.

19 Rivers, add to weaknesses Competition for recreational use, and Disturbance of wildlife by recreation. And to threats: Increasing recreational demand.

Mountains, moor and heathland, add to weaknesses, after "Rare species vulnerable to climate change" the words "and recreational disturbance", and remove from Threats, as this is happening already, not just in the future. Weaknesses: remove disturbance from the montane vegetation and soils item, as this is covered adequately by reference to trampling. Move inappropriate muirburn from Threats to Weaknesses, as this is also happening at present.

Urban: Move "Dispersed rural settlements rely heavily on transport by private car" from Threats to Weaknesses, as it is a current feature, not a possible future one.

20 I agree with the main opportunities highlighted on p66 as being ones to address.

21 and 22 I agree with the proposed approach.

23 B I would like to see encouragement to the development of mountain woodlands in this section.

24 and 25 I agree with the proposed approach

26 and 27 B. In one of these areas it is necessary to improve the coverage and coordination of Ranger Services and to secure improved public benefit while retaining the contribution made by employers. I believe the implications are to provide Ranger Services through a partnership arrangement similar to COAT where the main contributors are major stakeholders, but benefit can also be widened to those whose operations are of insufficient scale to justify separately employing a Ranger Service.

As an aside, the community description of Kingussie is well over the top when it describes:

The unique backbone to Kingussie is its shinty team, which is vitally important to the social fabric of the town.

This is not a description I recognise. I have been to dozens of social and community events in Kingussie over 22 years and only one – a shinty match – had anything to do with the team. I know

that it is the source of pride, but to suggest that it is vitally important to the social fabric of the town did cause a certain amount of amusement.

Response ends.

parkplan@cairngorms.co.uk

DRAFT PARK PLAN
COMMENTS BY P J SWAN

COMMENT 1

The following statements are found in pages 20 and 22:

Page 20: *“Over the period of the first National Park Plan:.....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.”*

Page 22: *“Challenges we faced over the past five years:.... Improving access to housing for people earning typical wages in the Park”.*

Page 22: *“Challenges we will face to 2017”* (following which there is no mention of affordable housing).

These are misleading and incorrect representations.

First, it has been established and confirmed by CNPA management that of the 250 affordable houses which CNPA has apparently laid claim to facilitating in the draft Park Plan, only 5 were at Ballater and these were approved – and probably completed – prior to the creation of CNPA. Untruthful claims do not enhance the reputation of CNPA.

Second, the combination of that incorrect claim and the omission of affordable housing as a top issue from the new Park Plan is likely to mislead an uninformed reader into believing that the problem of affordable housing has been resolved.

Affordable housing should be reinstated as a continuing pursuit for an outcome, perhaps displacing climate change as Outcome 8.

COMMENT 2

Section Page 23 - 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?”*

The issue of affordable housing has not been addressed at all adequately and remains a matter of increasing importance. CNPA must not walk away from it, under the pretence that it has been resolved. It has not been a successful experience so far. In Ballater CNPA should abandon its present housing policy and focus on creation of affordable housing while curtailing new open market housing and proliferation of not-normally-occupied dwellings.

I would suggest that affordable housing replaces the currently proposed Outcome 8 (low carbon).

COMMENT 3

Outcome no. 1 needs to be re-worded, because it is axiomatic that as *“More people learn about and enjoy the...special natural and cultural qualities of the Park”*, then less care will be given (in relation to the care needed) to the conservation and enhancement of those special qualities.

COMMENT 4

Five-year Outcome 8 – *“Business and communities will be successfully adapting to a low carbon economy”*. *Suggested benefits of this item are:*

- *“Businesses and communities will understand more about the likely effects of climate change and how to adapt to them and mitigate it.*
- *“Businesses and homes will be more energy efficient.*
- *“There will be less fuel poverty than there otherwise would have been.*
- *“People will make more use of public transport.*
- *“More energy for homes and business will come from renewable sources.*
- *“There will be more use of local food and timber products.*
- *“There will be better connected local supply chains for communities and businesses.*
- *“Land based businesses will manage land to mitigate and adapt to climate change”.*

Outcome no. 8 is curious – while it promotes very commendable principles, I would expect all necessary advice or regulatory processes relating to the **major** issues listed above to be managed by central government or other national scale agencies. With regard to the problem of carbon emissions, I cannot see any features of the CNP that lend themselves to any claim of differentiation. First, the CNP is not a major source of carbon dioxide on a global scale and so does not justify special attention for cuts in emissions. Second, I do not believe that CNP has any extraordinary technological resources that could be used to help other countries in reducing their carbon footprint. Indeed, CNPA has opposed the development of wind farms outside the CNP boundary, merely because they are visible from within the boundary. This is not congruent with an organisation that purports to have any serious environmental conscience or potential impact. It is, however, a symptom of muddled thinking. It may be that Scotland as country, by virtue of its weather or its relatively long coastline, could give technological leadership on a world scale in wind and wave generation; but these are nothing to do with the “special qualities” of the CNP. Put simply, CNP is a follower in this aspect of environmental protection. This outcome should therefore be reduced in scope to cover only those items that are CNP-specific and substantive in importance.

I note that, elsewhere in this documentation, reference is made to protection of the special qualities of the CNP from the impact of climate change – this is both commendable and practical and should be supported, eg in the area of flood protection, as an example.

COMMENT 5

Outcome 9 seems to be something of a paradox. First, it seems bizarre that CNPA should engage in the process of imposing unacceptable burdens on the sustainability of communities, as a precursor to “empowering” them to sort out their own sustainability issues. I request that, if CNPA is going to hand back responsibility to communities, then it should do so **before** prescribing the construction of large numbers of unwanted open market housing. Second, the language in which this outcome is framed is rather patronising. It seems to me that most of the communities in the CNP had their own models of

sustainability well established over generations preceding the inception of CNPA.

COMMENT 6

Five year Outcome 2 – *“The quality and connectivity of habitats will have improved, enhancing the landscape at a Park scale”.*

Reference in this outcome to increased storage of carbon in Scotland’s woodland (page 30) seems delusional, because of the insignificant size of the CNP woodlands, eg compared with the forests of Siberia or the equatorial rain forests. Nor does CNP have superior knowledge in showing the rest of the world how this should be done. CNPA should avoid risking derision over this reference to carbon and take it out. CNPA should not dabble in climate change, which is at least a national matter.

COMMENT 7

Five-year Outcome 4 – *“the qualities of wildness in the Park will be greater.”*

CNPA can do much to defend this desirable Outcome, mainly by trying less hard to build houses that communities don’t want or need, on the mistaken presumption that population / household growth will inevitably require vast new developments. The Park Plan of 2007 states: *“There is a need to ensure access to rented and low cost housing in perpetuity. This means identifying appropriate sites for housing and prioritising these in strategic planning as well as in funding programmes.....”.* This does not give the impression of conveying to CNPA a mandate to pursue wholesale open market development.

COMMENT 8

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

On page 42 it says: *“The dominance of these low paid sectors means that many of the people working in the Park are relatively worse off than people in other*

parts of Scotland. This has straightforward implications for the amount of money spent in the local economy by them, and for their ability to pay for necessities such as housing, transport and energy. It is exacerbated by the attractiveness of the Park as a place to move to by those who have generated wealth elsewhere”.

There is an intrinsic and undeniable clash between the first and fourth aims of the Park, which the founding legislation inappropriately seems to obfuscate. CNPA appears to be overly relaxed about the demands of the first aim. The wording and thrust of its 5-year Outcome 6 is an example of this, where it articulates various statements that describe the future benefits when the 5-year Outcome 6 has been realised:

- *“There will be a culture of creating a business friendly environment.*
- *Business growth will not be constrained by IT and communications infrastructure.*
- *Unemployment will remain low.*
- *More businesses will pay higher wages.*
- *The Park will continue to attract people who want to work here.*
- *Economic growth will support vibrant communities.*
- *The value of tourism will grow.*
- *The expectations and needs of visitors will be understood and addressed.*
- *There will be greater visitor satisfaction, improved business performance and more repeat visits to the Park.”*

None of these benefits seem consistent with the first aim of the Park. We can't have it both ways – ie a fine setting in which to live, surrounded by “wildness” as well as a vibrant, vigorous economy with a diversity of business activities and large numbers of in-migrants to bring in the skills and resources needed to run new ventures.

I do not support Outcome 6 in its present form because it is unrealistic to pretend that it can be reconciled with the first aim of the park. I challenge CNPA to articulate a single specific scenario that achieves this reconciliation.

Let the first aim of the Park prevail, or we will all end up empty-handed and the CNP will change from wilderness to wasteland.

That said, there is a way to ensure that the first aim can be achieved while delivering the above “benefits” – re-define the CNP boundary so that all the main settlements are outside the Park, so that the question of economic development of communities is no longer a CNPA major responsibility.

COMMENT 9

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

Q 16 A. I support this in principle, but encouraging people to walk and cycle instead of car travelling seems fine in summer but in cooler weather neither is feasible, especially for older people. This is the Cairngorms – be realistic!

Q16B. I favour packages 2 and 4. For no. 2, there is a need to look more closely at settlement-specific opportunities for its application, for example in the case of Ballater:

- CNPA is promoting large scale development on the north east side of Monaltrie Park, as a vehicle for “spinning off” required affordable housing. This would result in the park becoming landlocked by housing, with a fixed, finite amount of space.
- It is well known that Ballater youth are in need of more recreational facilities some of which will require large amounts of outdoor space, such as a BMX track, and/or a skate board park (mentioned merely as examples). This demand could render Monaltrie Park too small for its present menu of activities.
- Therefore, Monaltrie Park must not become landlocked by housing development but allowed to expand as needed to accommodate additional recreation facilities, especially for young people.

It is noticeable that amongst all the highfalutin text in the consultation documents, there seems to be no evidence of practical concern for the interests of the youth of the CNP communities.

Q16E. I think the indicators and targets proposed are unsuitable as they will be very difficult if not impossible to measure.

DRAFT PARK PLAN

APPENDIX 4 – COMMUNITY VISIONS

BALLATER – PAGE 92

The quoted vision text for Ballater is incorrect and must be corrected to conform to the version developed by B&CCC following extensive consultations with residents.

Specifically, the 3rd paragraph, 2nd sentence should read as follows:

“To make sure this happens, quality and affordable housing to meet local needs will be supported. This should be done using existing real estate and redevelopment where possible (rather than new open market house building), to avoid harm to the visual and natural environment.”

DRAFT PARK PLAN
STRATEGIC ENVIRONMENTAL ASSESSMENT
COMMENTS BY P J SWAN

Paragraph 1.4.

The wording employed here is confusing in the extreme. This is not plain English, but appears to be “planners’-speak”. The whole paragraph is makes no sense to me and may as well be deleted.

Paragraph 1.5.

At the bottom of page 5 it says: “The Assessment has identified some specific mitigation which should be considered in developing the Plan further and in delivery:

- *“Ensure woodland expansion does not happen at the expense of best quality farmland;*
- *Ensure that woodland expansion maintains or increases timber and woodfuel production;*
- *Ensure woodland expansion does not increase carbon release over longer term (ie through disturbance of carbon-rich soils, especially peat;*
- *Ensure the most productive agricultural land is not lost to other uses;*
- *Ensure economic development does not have negative effects on water quality and supply”*

Pondering over the first of the above bullet points, I wonder, has anyone in CNPA considered what message is conveyed by this statement in view of the piece of “Spatial Strategy” being concocted in Ballater that abets the construction of up to 250 houses on farm land that is presently Class 3, Division 2 and, according to advice received from the Macaulay Land Use Research Institute (copy attached to this submission), there is a probability that the effects of climate change over the next few decades will result in an upgrade of

this land to Class 3, Division1, at which level of quality there is a presumption against development. So, it seems that CNPA is anxious to protect farm land from encroaching woodland but is indifferent to the replacement of the same farm land by a large housing development.

The third bullet point is equally fatuous, in that CNPA's statement seems to imply that the CNP area is world scale depository of carbon rich soils.

Paragraph 2.4

The Cairngorms National Park Authority (CNPA) is required to prepare a National Park Plan for the Cairngorms National Park and to review it every five years under the National Parks (Scotland) Act 2000.

Please can you advise where I can find the review report? This "draft" Park Plan looks like a complete re-write; why is this?

Paragraphs 3.29, 3.30 Consideration of Reasonable Alternatives

At the end of paragraph 3.29 it states: *"On the one hand there are therefore potentially endless alternatives, but in practice there are few reasonable alternatives of substance that could reasonably be assessed.*

3.30 The exception to this is where the National Park Plan sets the context for the Local Development Plan and in particular provides a context for the future development of land in the Park. However, there are a number of areas where hypothetical alternatives exist but where for practical reasons none are considered reasonable:

- *The upgrading of both the A9 road that travels through the Park and the Perth to Inverness Rail line will be major projects that have a range of environmental impacts and will be controversial. However, both are stated policy objectives of the Scottish Government. The Draft National Park Plan notes that the planning of these projects would need to minimise and avoid negative environmental impacts.*
- *There will be need for new housing in the Park in the future to meet the needs of communities and to accommodate any growth. The Local Development Plan considers the need and how to meet it in detail.*

Hypothetically, the National Park Plan could set a low target or constrain future growth. However, the National Park has a consented land supply that is likely to last around 20 years into the future. We must assume that those consented sites will be built so there is no reasonable alternative.

- *The National Park Plan supports the existing settlement hierarchy within the Park – using the existing larger settlements as the main service centres because they are the places where most people live and have the widest range of existing services. To adopt an alternative would lead to substantial changes in the character of other settlements, threaten the viability of others and increase the need for people to travel. It would not be a reasonable alternative.*

My responses to these statements on alternative schemes are as follows:

- With regard to the A9 and railway upgrades, these pieces of infrastructure should never have been inside the CNP. The boundary should be redrawn to exclude these and all / most of the main settlements.
- Just because CNPA has a large consented land supply, this does not justify building houses for which there is no proven need.
- CNPA's review of alternative schemes has ignored options for Ballater, where there are significant possibilities for making good the failure of CNPA's housing strategy to deliver needed affordable housing. Details of my proposed alternative scheme are included with my comments on the MIR.

DRAFT PARK PLAN
EQUALITY IMPACT ASSESSMENT

COMMENTS BY P J SWAN

Consideration should be given to a group that has no title but comprises those who cannot or do not wish to have internet access. CNPA's systematic neglect of these people is unacceptable.

From:

Sent: 17 December 2011 16:35

To:

Subject: Re: national park consultation

Dear Cairngorms NPA, I should perhaps have included in my previous email, in case explanation is needed, that access taking by adventure sports, particularly when carried out irresponsibly, can greatly interfere with angling. One problem is that, particularly on smaller rivers, the access taking can disturb the fish making it less likely that they can be caught by anglers, perhaps for the rest of day so that the effects persist long after the access takers have moved on. Many thanks again, Ross Gardiner

Dear Cairngorms National Park Authority

I spoke with Gavin Miles yesterday and he let me know that the Authority would accept email comments on the main issues report and draft National Park Plan up to close of play today. I have one comment to make

My comment

Although angling and water based adventure sports are both mentioned in the documents there is a need to the Authority to consider (for example in the Plan Five Year Outcome 10 and the Main Issues Report Section 13) what roles it should play (including in stopping irresponsible access taking and in mediation between the parties) in the conflicts that are arising, particularly on small rivers such as the River Garry.

I have completed a respondent information form which I will send on shortly.

Please acknowledge receipt.

Many thanks.

Ross Gardiner

Draft National Park Plan – Response from Roy Turnbull

Dear Sir

My comments here are brief, since I fully endorse the responses put to you by the Cairngorms Campaign and the Badenoch and Strathspey Conservation Group.

I wish here merely to emphasise a few points:

- I am deeply disappointed in the draft National Park Plan, and consider the CNPA claim that it “builds upon” the previous NPP2007 to be false.
- **Question 2** In particular, the descriptions of the special qualities of the CNP are wholly inadequate. Indeed they appear, in their short, inexact and poetic nature to have been designed to make them completely useless when faced with the task of recognising, monitoring and protecting those special qualities. The possible reasons for the CNPA producing this kind of description of the special qualities are deeply disturbing.
- **Question 4** I do not agree that the long-term outcomes given in NPP2007 should be condensed.
- **Question 6** The most important outcomes are: **Outcome 2, Outcome 3, Outcome 4 and Outcome 7**. These relate to the value of the natural and cultural heritage and the imperative of conserving and enhancing it.

Yours sincerely, Roy Turnbull

From: Sally Freshwater

Cairngorms National Park

To follow up on the meeting held in Talla nan Ros last Thursday, 27th October. I should like to make the following points:-

Park Plan Outcome

To quote from your book: "4.3 National Parks in Scotland have four statutory aims, as set out in the National Parks (Scotland) Act 2000. These 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," and

" to promote sustainable economic and social development of the area's communities.

These aims are to be pursued collectively. However, if it appears that 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, (Section 9 (6) of the National Parks (Scotland) Act 2000).

It is no good setting out Point 2 and Point 4 in your Park Plan Outcome if you are going to pass the huge number of houses projected as 1500 at Camus Mhor, 300 at Kingussie, 50+ at Kincaig and 200 at Newtonmore. The reason the area was made a National Park was because of its very special qualities. Housing on the above scale will totally destroy the nature of the villages involved, will almost certainly be bought predominantly by second home owners and will swamp the services like sewage, refuse, schooling, medical and transport.

To retreat behind the statement that "the planning permissions in principle were all passed before we were created" is to side-step the point. If you were created to conserve and enhance the area you need to tackle that issue head on, with government backing, to re-assess the needs of the area and reduce the numbers contemplated. Have the courage to go to battle over it for all our sakes and for future generations. If you do not, your item 7 will be a hollow promise, closely followed by an equally empty offer of items 2 and 3.

Local Development Plan Options

The first word of paragraphs 1 and 2 says it all " "PROTECT" and states again that you must make sure all new development is done in the most sustainable way and that surely means small-scale, fitting in gently to what is already there, or better still, reviving old defunct buildings (i.e. the Court House at Kingussie) and not using up precious green field sites.

Paragraph 4 has the right aim "supporting our local communities needs" to keep young people in the area to balance out the high proportion of retirees. A large proportion of any new housing must be aimed at their financial level, not the huge houses we see being built on the High Burnside site, which can only be aimed at the second home owner with plenty of money.

Item 6 probably includes the Loch Insh Watersports site as it is outwith the Kincaig village area. Can we see a more realistic appreciation of the needs for housing on site for the employees of this quite substantial enterprise, which has been working for the last 40 years towards providing a first class facility to encourage the visitor to come to the valley and return again because he liked what he found. But the staff need housing and two years ago the Park turned down an application for a house within the complex for a key member of staff, a local born, bred and schooled here, stating they did not feel his commitment to working here justified allowing him to build a house on his own piece of land!

Many of the jobs in tourism are not year round jobs with a steady salary, unlike those of the members of the National Park. Many sports instructors and restaurant workers have to look elsewhere for work in our winter months, but we need to encourage them to return, with their special expertise to continue to provide the high level of skill to teach that is demanded by most of the public these days.

I hope my comments will be taken on board by you, as given by someone who has lived here for the past 44 years and hoping that my children and grand children will still be able to enjoy what brought us "incomers" to the area long before the National Park was created to safeguard it. Please have the courage to stand out against the big developers and remember the silent majority who actually live and earn their living here.

Yours sincerely
Sally Freshwater

COMMENTS OF VICTOR F J JORDAN ON THE DRAFT CAIRNGORMS NATIONAL
PARK PLAN 2012-2011

” 2012-2017” should be removed from the title.

1. In making this National Park Plan a plan for a limited period, 2012 to 2017, the Cairngorms National Park Authority have failed to follow the scheme laid down by the Scottish Parliament. Section 13 of the National Parks (Scotland) Act 2000 requires a National Park Authority, in effect, to review their National Park Plan at intervals of not more than five years and if it thinks fit to prepare an amended plan. The approach actually adopted by the Cairngorms National Park Authority commits the Authority in five years’ time to producing a new National Park Plan whereas under the statute it is for the members of the Authority at that time (or earlier!) to decide whether to prepare an amended plan.
2. The National Park Plan approved by Scottish Ministers in 2007 does not purport to have a limited life and certainly looked beyond 2012. Yet it is described in some places on the Authority’s web site as “The Cairngorms National Park Plan 2007-2012”. If the Authority had followed the scheme laid down in section 13 they would have realised that they were not under any obligation to produce a new plan and would have been more likely to have considered more systematically what amendments should be made to the National Park Plan approved by Ministers. Amongst matters apparently jettisoned without specific consideration by the Authority are the basic statistics on housing on page 72 of the National Park Plan approved by Ministers in 2007. If the Authority had followed the scheme in section 13 it is less likely that there would have been the wholesale restructuring of the National Park Plan that has taken place. Such a restructuring makes it difficult to see what substantive changes or refinements of policy have taken place. It also is likely to cause staff and members of the Authority to devote to issues of drafting and presentation time that would be better spent on examining the substantive issues confronting the Cairngorms National Park Authority.

The last paragraph on page 9 should be removed.

3. This paragraph is a gloss on the provision of the National Parks (Scotland) Act 2000 summarised two paragraphs earlier. I suggest that it is unnecessary and tends to distract attention from the provision itself. In any event this paragraph gives insufficient weight to the words “in any matter”. This paragraph does not of course represent a policy for coordinating functions but is at the most a mere technique of making decisions and policy.

Under “Purpose of National Park Plans” on page 10 the text should include policy on the coordination of the exercise of functions.

4. The text omits sufficiently if at all to indicate that part of the statutory purpose of a National Park Plan is to set out the National Park Authority’s policy for coordinating the exercise of the Authority’s functions (and the functions of other public bodies) with a view to accomplishing the purpose of ensuring that the National Park aims are collectively achieved in relation to the National Park in a coordinated way. I suggest that all the words of section 11 of the National Parks (Scotland) Act 2000 from “setting out its policy for” to the end of the section be quoted.

The Vision on page 16 contains no sense of direction.

5. It could be argued that the Vision describes the National Park at present. It should give a sense of where improvements are needed or how challenges are to be met.

Question 4 on page 17.

6. I think that the twenty three long term outcomes should be retained though some might need updating or amending.

Question 5 on page 23

7. I feel that advice and support for land managers is a subsidiary aim which does not warrant a place as one of only ten outcomes.
8. I suggest that Outcome 5 should be replaced by something on the following lines;
“A policy will have been developed in response to the fact that the proportion of residents in the National Park who are over 65 is increasing at an extreme rate which is greater than the national average.”

Question 7 on page 29

- E
9. I think that the targets should be the actual numbers to be attained. The present numbers should also be given for purposes of comparison.
- F
10. I think that the numbers of visitors should also be a target especially as page 77 shows that the numbers are recorded.

Question 9 on page 35

- B
11. Please see my answer to F below.. .
- F
12. Since the RSPB and other organisations, like SNH, carry out assessments of numbers of birds and other animals of certain species, like red squirrels, such numbers should be used as indicators if such assessments are made for the National Park or any of its parts. If such assessments are not currently made perhaps meeting the omission could be a target or a package of work.

Question 10 on page 38

- A
13. I think that such an outcome is appropriate but it would be more realistic if it read “The existing areas of wildness are retained and where possible their wildness enhanced.”
- C
14. There should be a much larger scale map showing degrees of wildness than that on page 68 and it should be available for inspection and/or sale to the public.
- F
15. . The target should be in terms of hectares or acreage and the present figures should be given for purposes of comparison.

Question 12 on page 44

- E
16. The number of businesses in the Park is rather vague. How is a business defined?
There will be a number of self employed persons in the National Park who will contribute to the local economy through consumption of materials and some use of casual labour. It is vital that any indicator catches such businesses or a misleading picture of the economic state of the National Park is liable to be given.
17. The number of jobs created should not be used as an indicator on its own without some indicator of total employment. The number of jobs created can mask an overall decline in employment. The indicator should be the current national indicator of employment. This was once expressed as a percentage of the employed population or some such formula.

Question 13 on page 47

— A

A 18. Yes but I do not necessarily agree with its precise terms.

E.

19. I do not agree with the only indicator given nor do I think that it is aptly expressed. Dealing with the latter criticism first, the indicator is said to be the number of High Street improvement projects that have been implemented but the target is not a number. The target is the completion of all projects which would be the appropriate target if the indicator were proportion of projects completed. In any event such an indicator could be an indicator only of the efficiency of some agency or agencies. It does not indicate how successfully the distinct sense of place and identity has been retained or enhanced. I suggest that either a suitable question is incorporated in the visitor survey or a body like the Civic Trust does an assessment or the local residents are canvassed.

Question 15 on page 53

 A
20. Yes.

 C
21. If “community development trust” has a technical meaning this should be defined and it should be made clear that any type of local trust or organisation furthering aspects of the public weal should be eligible to receive encouragement.

 E
22. I do not agree with the last two. I think that a better indicator would be something like the number of communities where expenditure by local organizations exceeds a certain amount per head of the population

Question 17 on page 58

23. No. I do not agree with the proposed use of the formula regarding multiple benefits.

Question 18 on page 58.

24. This is a theoretical formula which seems to suggest that the number of benefits provided (or “boxes ticked”) by a proposal or policy is more important than the strength of the positive intrinsic merits of the proposal or policy. The benefit provided by a proposal in one respect might be very great or exceptional but it might be ruled out because its benefits are restricted to that one respect.

25 This formula is a mere technique for decision making. It does not constitute the policy which the National Park Plan should include for coordinating the exercise of the Authority’s functions and the functions of other bodies in relation to the National Park as required by section 11 of the National Parks (Scotland) Act 2000. I suggest that, to evolve a policy for coordinating the exercise of functions, the plan should, by reference to statistics and other facts, examine recent trends in the National Park in various fields like employment, population, and building of houses and other development both in the Park as a whole and in its different parts, should consider where the trends will lead to in the future if adopted policies are maintained and consider whether those policies should be changed or new policies adopted to meet problems and ensure the collective achievement of the National Park aims in a coordinated way.

Question 19 on page 66

26. I do not agree with the inclusion of these lists of opportunities, threats , strengths and weaknesses in the National Park Plan. They are mostly if not almost entirely a mere check list for persons devising policies. Instead the National Park Plan should identify actual threats or actual potential dangers and opportunities with reference to what is happening “on the ground” and lay down policies or adjustments to policies to deal with these.

The statement from the Ballater and Crathie Community Council has not been included in full on page 92

27. In the third paragraph after the words “redevelopment where possible” the Community Council’s statement as approved by the Community Council has the words “(rather than new open market housebuilding)”. These words should be reinstated as an undertaking was given on behalf of the National Park Authority at the public meeting in Ballater on 3rd November 2010 that the vision statement would be put into the National Park Plan verbatim. Moreover this draft plan on page 51 says that the visions are in the draft plan “in each community’s own words”. It is presumably on that basis that the statement of Dalwhinnie is printed with the extraordinary assertion that Dalwhinnie has the only working distillery in the Cairngorms National Park. It is therefore also strange that Ballater’s statement is printed with at least another five alterations in addition to the significant one to which I have drawn attention.

Victor F J Jordan 1st December 2011.

3.0 DRAFT CAIRNGORMS NATIONAL PARK PLAN 2012 – 2017

Vision

- 3.1 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”.
- 3.2 In order for this vision to be realised, encouragement needs to be given through the planning system to retain the local population in the area by offering choice in the housing market over a range of locations, including consolidating existing groupings and hamlets outwith the main settlements.

Question 4

- 3.3 The long term outcomes relating to access to housing are supported and these aims can only be achieved by allowing additional quality new facilities in support of existing communities and groupings/hamlets such as Drumuillie.

Questions 5 & 6

- 3.4 We consider that the focus for 2012 – 2017 covers the outcomes that are required to retain and enhance the distinct sense of place and identity within the landscape of the Park. One additional outcome could be to increase housing opportunities by embracing new development that fits the aims of the Plan, in location outwith the main settlements by sustaining groupings and hamlets through limited new growth.

Outcome 7 - Question 13

- 3.5 We agree that this new development within the park should be designed in a manner which is sympathetic to the existing grain of the communities in which that new development is targeted. This outcome is one which will be embraced by our client when detailed proposals are brought forward.

4.0 CAIRNGORMS NATIONAL PARK LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT

4.1 We have concentrated our response only on the issues that directly affect the use we propose at Drumuillie.

Special Qualities of the Park - Question 1

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

Spatial Guidance (Option 3) – Question 2

4.3 We agree that clear guidance on directing development away from sensitive locations should be the preferred approach. Our client's plotted sites of Drumuillie should qualify as a preferred location due to its non-sensitivity from an environmental perspective. All care will be taken to comply with sustainable Design Guidelines and as indicated, the site can be easily serviced.

Affordable Housing - Question 4

4.4 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

4.5 We agree with the generality of the spatial strategy which focuses development in settlements such as Boat of Garten, near Drumuillie. Moreover, we support the suggested action to "*Clarify what is anticipated in rural communities outwith identified settlements*".

4.6 In this respect, this issue is a key policy response we seek through this consultation.

Whilst we consider Site A complies with current Adopted Local Plan Policy 21, a more flexible approach is required to enable Site B and, in this context, we support this review and recognise the potential for additional "*ad hoc development outside the settlement hierarchy to meet local need*". This presumably would operate on a site-by-site basis, and be determined on the specific circumstances pertaining to the relationship between sites and existing groupings/hamlets, such as Drumuillie.

4.7 We further consider in this context, that our client's sites are deliverable/effective in terms of national planning policy and achievable for all practical purposes.

4.8 We therefore recommend that existing Policy 21 be altered or replaced to create sufficient flexibility to achieve the aims of Issue 5, Option 1, as set out in the "implications" bullet points which we have addressed

- A. *Draft Cairngorms national Park Plan 2012 – 2017*
B. *Cairngorms National Park Local Development Plan Main Issues Report*
Mr William Grant
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- 4.9 We agree with the preferred option (Option 3) and the need to allow different approaches in different communities. We are confident that our client's sites A and B will meet the prospective criteria for a site's sustainability within the context of the landscape, and the dispersed character of the grouping/hamlet which also builds on historic growth patterns.
- 4.10 We further consider that sites A and B cannot be described as development in open countryside and will provide an entirely sustainable and suitable consolidation in line with the principles set out in both Issue 6 and Issue 5.

In Summary

- 4.11 As we have confirmed in this submission, we have reviewed the extent of development being sought through the LDP and would request that our client's revised sites A and B be included as preferred sites in the forthcoming Local Plan, for the reasons set out in this report.

5.0 CONCLUSIONS

- 5.1 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.
- 5.2 In substance, the provision of a limited number of housing plots within the rural hamlet of Drumuillie meet with the principles set out in the Draft National Park Plan and indeed, the existing National Park Plan.
- 5.3 In detail, referring to the Main Issues Report, we consider that the sites at Drumuillie should be supported in the Local Development Plan for house plots for the following reasons:-
- Our client has responded to the Park Authority's views on the submitted Call-for-Sites and significantly reduced the area to be considered.
 - The sites form a natural and sustainable consolidating/rounding-off at Drumuillie.
 - Site A fully conforms with Adopted Local Plan Policy 21.
 - Both sites are effective in terms of National Planning Policy.
 - It is considered that there are no landscape, ecological or setting issues put at risk by building on these two sites.
- 5.4 We would request that sites A and B, as described in this report, be considered suitable as plotted residential sites and that flexibility be included in a revised rural housing policy to replace Policy 21 along the lines outlined in Issues 5 and 6 of the Main Issues Report, which we support as creating the opportunity for a more flexible approach to rural housing.

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