

Badenoch & Strathspey Conservation Group



economy@cairngorms.co.uk

20 September 2019

Response to CNPA Economic Action Plan 2019-2022

Climate and Ecological Emergency

We welcome the references to climate change in the EAP, but we would like to see the EAP showing a lot more ambition regarding this crisis. The Plan reads far too much like 'business as usual'.

The IPCC has made it clear that 'urgent and unprecedented changes are needed'. The EAP should clearly reflect this need for urgent, widespread and unprecedented changes to how things are done. At present the Plan fails in this. By the end of the plan period of 2022 we will only have some 8 years left in which to meet the climate change target that the IPCC warns we must achieve to avoid severe effects of climate change. The CNPA needs to set out an EAP that energetically addresses how the economic activity of the Park can contribute to the solutions, rather than making the problems ever greater.

The climate/ecological crisis has very major economic implications. To act on climate change today is expensive, but to suffer the consequences of more extreme climate change tomorrow is forecast to be far more expensive as well as extremely costly in terms of human society and the environment. The EAP could include considerably more analysis of the impacts and opportunities of the emergency over the next 3 years on the economic activity of the Park, that could help guide actions. We also suggest that specialist knowledge should be accessed beyond the expertise within the CNPA.

The CNPA needs to set ambitious targets in the EAP that will make significant inroads into halting climate change. To help achieve these targets we would like to see ambitious, proactive leadership from the CNPA, with the Authority seeking to proactively influence government over bringing in the necessary changes, legal and regulatory, that would promote and enable new ways of doing things in the CNP. One possibility would be an approximate equivalent to island proofing being introduced for our National Parks, such that different standards can be required in them.

The turn out of some 200 people in Aviemore today to support climate action indicates the level of concern there is for action in the NP. The public is crying out to our leaders to take significant, effective action now, not wait for a few more years.

Construction

Construction is a major contributor to the problems of climate change and biodiversity loss. The CNPA urgently need to develop ways of significantly reducing the level of new housing. To help address this we suggest that residency criteria are introduced that would enable new housing to be far more effectively targeted at people with a reason for living in the Park and who cannot afford the high prices of open market property. The problem of new affordable housing failing to remain in the affordable market in perpetuity (commonly entering the open market at the 2nd sale) also needs to be urgently addressed, as significant leakage from the affordable market requires a continuing supply of new build housing. To address these two issues, and potentially many others, we would like to see the CNPA acting proactively with government to enable any necessary legal and regulatory changes to be made.

Changes need to be made such that the CNPA are not required to make provision for so many houses in the forward plans, many of which become second/holiday homes. The natural environment of the Park brings significant national and economic benefits.

The CNPA should include in the EAP a target to provide advisory and/or economic input to support retrofitting of, for example, improved insulation, renewables and more energy-efficient space heating for older buildings. For new build the CNPA should proactively enable the changes to be made such that all new buildings are required to be extremely energy efficient and compliant with a passivhaus certification standard.

Such new ways of doing things is what the IPCC's 'unprecedented change' should look like.

Ski Industry

The problems on Cairn Gorm need to be addressed with a strong focus on the climate and ecological emergency. The EAP should be setting out how a just transition can be achieved that enables snow sports to be enjoyed when snow conditions allow, but moves the winter economy away from reliance on the availability of snow.

Circular Economy

We welcome that this is already included in the EAP. In addition, we would like to see the EAP present concrete ways in which the Park can achieve elements of a circular economy in the next 3 years. This would promote more rapid action on achieving a circular economy.

Plastics

We would like to see the EAP set an ambitious target of rapidly phasing out single use plastic in the CNP by 2022 or before, and for the CNPA to provide support to businesses, offices, householders etc to help achieve this.

We would like to see the CNPA lead the way in the substitution of agricultural plastics.

Muirburn

The extensive muirburn in the Park contributes to climate change as well as other environmental and health impacts. Whereas we welcome that the CNPA is promoting additional woodland, we would like to see the EAP addressing changes that the CNPA could make to promote the land use changes that would reduce muirburn.

Small Businesses

We would like to see the EAP acknowledge the value of small businesses and do more to promote understanding of the negative impacts on the interests of small businesses that can arise from developments, large businesses, and subsidies.

Waste Water Treatment Works

We would like to see the EAP refer to the problem of low water flows and elevated temperatures, which are potentially associated with climate change. Such challenges could be partially mitigated by the rapid introduction of more stringent standards to cover the quality of outflows from WWTWs. Water quality has many economic implications.

