**Cairngorms National Park Plan
Final Consultation Report**

December 2006

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Contents

1. Introduction

This is a final report on the public consultation held on the Draft Cairngorms National Park Plan, launched on 11th April 2006 and closed on 30th June 2006. It reports on the consultation process and the responses received, provides a publicly available summary of consultation responses and details the changes made to the Draft Park Plan as a result of consultation. The report is published with the finalised National Park Plan as a full report of the consultation process.

2. Context

The National Park Plan was shaped through a two year process involving significant engagement with stakeholders and the wider public including the following key phases:

- Discussions with stakeholders (over 50 organisations listed in the draft plan) during 2005 to identify the issues the plan should address and inform development of the Draft National Park Plan;
- Community questionnaires and workshops on the Local Plan provided feedback on wider community aspirations for the National Park;
- Public consultation on the Draft National Park Plan from 31st March – 30th June 2006;
- Discussions with stakeholders following public consultation to inform completion of the plan.

3. Aims and Objectives of the Public Consultation

3.1 Aims
- To inform preparation of a completed National Park Plan that reflects the views and has the support of a wide range of stakeholders for Ministers to approve;
- To meet the Cairngorms National Park Authority's statutory obligation to hold a formal public consultation.

3.2 Objectives
- To contact identified audiences and provide them with clear information on the proposed plan and easy mechanisms to contribute their views;

- To ensure everyone living and working in the Park has access to an overview of the Draft Plan with information on how to get involved;
- To raise public awareness of the Draft Plan and the consultation process and seek the views of national audiences.

4. Consultation Methods

In pursuit of these aims and objectives the following methods were used:

4.1 Published Documents

The National Park Plan, State of the Park Report and Strategic Environmental Assessment were published as a set of documents for distribution (see below). The initial print run of 1,000 copies proved insufficient and a further 500 were printed. A separate easy-read summary was also published for wider distribution and awareness-raising. All documents were available in large print on request.

The full set of all documents listed above was circulated to:
- Partner and stakeholder organisations;
- Libraries within the Park and in regional centres surrounding the Park;
- Schools within the Park;
- Youth Forums;
- Local Authority service points and offices;
- Community Councils;
- Members of Cairngorms National Park Advisory Forums;
- Constituency MSPs, MPs and MEPs;
- Other UK National Parks;
- Individuals on request.

The summary document was circulated, in addition to the above, to:
- All households and businesses in the National Park;
- Selected visitor centres;
- All MSPs, Scottish MPs and Scottish MEPs.

4.2 Website

The Cairngorms National Park Authority's website contained a page on the consultation with a button link from the homepage. The consultation page included information about what the National Park Plan is, the process for developing it and the consultation itself.

Full copies of all the published documents were available to download from the Cairngorms National Park Authority's website. Several partner organisations also added links on their websites to raise awareness and help people to access the documents.

4.3 Media Awareness

A media launch for the draft plan was held on 11th April 2006 in order to raise awareness of the plan, the issues it addresses and the consultation opportunity. This was attended by representatives from many partner organisations as well as the media.

The media coverage of the draft plan focused largely around the launch. Monitoring of media coverage during the consultation period identified the following number of articles, although there may have been more:

Number of articles in media	
Television	3
Radio	12
News Websites	2
National Newspapers	4
Local Newspapers	4

4.4 Consultation Meetings

A total of 31 consultation meetings were held during the consultation period to discuss the draft plan and collate views. These included open community meetings and meetings with specialist interest groups.

A full schedule of the meetings is given in Appendix II. In total, 588 people attended meetings of varying format.

Community Meetings
In planning the consultation, the National Park Authority sought advice from communities on the best way in which to consult on the Draft National Park Plan. Early meetings with Community Liaison Officers, the Association of Cairngorms Community Councils and then with representatives of Community Councils indicated that, given the scope of the draft plan and its strategic nature, it would be best to hold combined meetings rather than seek to meet separately in each community.

Some Community Councils, however, felt that separate meetings would be appropriate, and these were arranged. The community meetings therefore comprised:

- 2 discussion meetings with representatives of Community Councils and other community groups in Aviemore and Ballater;
- 2 meetings with the Association of Cairngorms Community Councils;
- 4 open (public) discussion meetings in Grantown, Kingussie, Braemar and Memus;
- Open stand at Ballater Community Roadshow;
- 3 individual Community Council meetings by request at Dalwhinnie, Nethy Bridge and Braemar.

Interest Group Meetings
Meetings were held with the following interest groups:
- Built Environment Forum Scotland;
- Cairngorms Chamber of Commerce;
- Cairngorms Deer Advisory Group;
- Cairngorms Housing Group;
- Cairngorms Recycling Forum;
- Cairngorm, Rothiemurchus and Glenmore Group;
- Cultural Heritage Stakeholders Group;
- Economic and Social Development Advisory Forum;
- Integrated Land Management Advisory Forum;
- Learning and Inclusion Stakeholders;
- Schools Groups;
- Scottish Environment Link;
- Visitor Services, Information and Tourism Advisory Forum;
- Visitor Services and Interpretation Stakeholders;
- Youth Forum.

4.5 Equalities

During the consultation period every reasonable effort was made to promote and mainstream equality. As wide a range of people and groups as possible were involved in the process through use of the various methods described in Sections 4.1 to 4.4. Prior to the consultation early efforts were made through the development of Learning and Inclusion Plans at the beginning of 2006 to identify and involve groups who might be affected by barriers to consultation. At that time consultees from both within and outwith the Park included minority ethnic representatives, homeless and poverty groups, women, young people, older people and people with disabilities. A postal questionnaire was sent to 100 organisations, and 2 focus groups (attended by

20 organisations) and 2 stakeholder events (attended by 25 in Nethy Bridge and 15 in Strathdon) were held. The views expressed in the returned questionnaires and at the various events have informed the development of the National Park Plan.

4.6 Summary of Participation Statistics

Total participation numbers	
Total number of responses submitted	124
Total number of consultation meetings	31
Total number attending meetings	588 (includes some duplication)
Average webpage visits/day*	243 hits/day (approx 1/3 of total site visits

* National Park Plan consultation webpage was the top-rated page on the Cairngorms National Park Authority site during the consultation period.

Breakdown of respondents	Number	%
Public Bodies	21	17%
Non-Governmental Organisations/National Governing Bodies	13	10.5%
Communities	7	5.5%
Professional Associations/Businesses	22	18%
Individuals	61	49%

There was a good range of respondents from different sectors; in particular, the proportion of individuals responding was relatively high. The most challenging sector to engage in consultation was communities. Possible reasons include the breadth and strategic nature of the plan, the time implications of engaging in the process and responding, together with the wider time demands on this sector. Although only 7 responses from community organisations were received, many more were involved in the process through meetings and discussion forums. Almost 50% of all responses came from individuals, a relatively high percentage, which suggests that those individuals with a particular interest were able to respond.

Attendance at the open community consultation meetings was generally low. Although the meetings were held at the request of community representatives, advertised locally and timed so as not to coincide with other community events, attendance – particularly at the meetings in Badenoch and Strathspey and Angus – was low.

For all stakeholder sectors, the National Park Authority sought advice from representative bodies on the best means of consultation. However, there

remained a tension, noted by several sectors, between offering opportunities to engage and recognising the resource burden of consultation on stakeholders.

Overall, the quality of the responses in terms of the relevance to the draft plan and the issues involved was high. While there were many and sometimes divergent views expressed, most responses contained a high level of constructive comment and an explicit wish to be involved and make a positive contribution to developing and delivering the plan.

5. Summary of Responses and Completion of Plan

This section sets out a summary of the views and comments expressed on each section of the Draft National Park Plan, followed by the changes made to the plan as a result of the consultation process. It does not list every comment made; nor does it include all suggestions for redrafting of text or all detailed changes to wording, but it summarises the range of views expressed, the issues raised and the changes made as a result. The summary includes views expressed during the consultation meetings as well as in written responses.

Over and above the summary provided here, a significant number of responses also made reference to additional national policy context and partners to be considered on specific subjects; appropriate changes have been made to the plan to reflect these suggestions.

Views and comments are not ascribed to individual respondents, but where appropriate the broad category of the respondent is noted. This is intended to help give as full an understanding as possible of the range of views expressed and highlight both common and divergent views. A list of respondents is provided at Annex I.

The comments and changes detailed below are organised by the structure of the consultation draft, on which comments were based. The structure of the completed plan has changed, and the new section headings and numbers, where appropriate, are detailed in the text.

5.1 General

Comments

Context

Several responses sought greater clarity on the relationship between the National Park Plan and other policies and plans of both the Cairngorms National Park Authority and other organisations. A number of responses sought greater reference to existing policies and plans, as well as to regional and national objectives. Clearer links to the Local Plan were also requested. Many emphasised that the plan must demonstrate clearly how it is adding value over and above existing activity.

Common to many responses was a suggestion the plan should be more outward-looking, addressing the national role and context of National Parks more explicitly, although a small number suggested that national issues are perhaps too prominent in the draft. There was also sometimes a suggestion that explicit reference should be made to the effects of the Park and the plan on the areas immediately surrounding the boundary of the Park, and to cross-boundary issues.

Structure
There was support expressed in several responses for retaining a relatively concise document and for continuing to simplify and refine the structure. While some indicated that the split into two documents with different time horizons is useful, there was a general sense in responses that this hinders understanding of the whole. Several responses stated that the logic running between sections is not clear enough and that the structure and presentation of analysis could be clearer.

There was also confusion expressed in some responses about the relationship between the priorities for action and the strategic objectives. A number of responses expressed concern at the volume of information that is subject to consultation at the current time within in the National Park.

Changes made following consultation

Context
A new Section 3 'Context' has been included to bring together all contextual references and incorporates elements from original Section 1 'Introduction', Section 2 'The Cairngorms – A Special Place' and Section 3 'Managing the Park in a Changing Environment'.

Section 2.5 provides more information on the relationship to other plans and strategies, including a schematic diagram to indicate the relationship between the National Park Plan, community plans and national and regional strategies.

The national and regional context, looking at the interactions beyond the boundaries of the National Park, has been addressed more fully in new sections within Section 3.2. The lists of existing policy context within the strategic objectives (Section 5) have also been expanded to reflect respondents' comments and clarified as the national policy context on which the plan seeks to build. In addition, the national strategies and objectives to which the priorities for action contribute are also now highlighted in Section 6 'Priorities for Action 2007-2012'.

Structure

The structure of the plan has been revised. The major change has been to incorporate all parts into one document, in contrast to the two presented for consultation ('Looking to 2030' and 'Priorities for Action 2007-2012'). In the final document Section 6 contains the Priorities for Action. This provides greater clarity on the relationships between sections and is designed to make the plan easier to use.

A new section (Section 7) on implementation has been added, containing new elements on adding value, investment, research, the Cairngorms National Park Authority's role in implementation, the role of other plans and strategies, and challenges and risks. Changes have also been made to sequencing of individual sections and paragraphs within sections. This provides a more logical progression overall to promote a clearer understanding of the whole and make it easier to use.

5.2 Looking to 2030

Special Qualities (Section 2)

Comments

There was a broad consensus on the range of special qualities, but several suggestions that these could be presented with more distinct reference to the Cairngorms context. There were particular suggestions to strengthen the reference to the special range of recreational opportunities and associated culture of recreation, as well as more explicit recognition of the wild land qualities and land management.

Some local respondents suggested that more should be made of the special qualities of communities, and that a section should be included on businesses, although one response suggested it is difficult to make the case that the communities are particularly special.

Some indicated it is difficult to see a 'distinctive and coherent character' across the Park and suggested it is important to recognise that the qualities vary across the area.

Changes made following consultation

The original Section 2 'The Cairngorms – A Special Place' has been incorporated into the new Section 3 'Context' at 3.2, which provides more in-depth detail on the individual elements of the Special Qualities. The scope of the special qualities has been more clearly defined as including the special natural and cultural qualities of the Cairngorms. Information on communities and businesses was considered more of a descriptor of current state as contained in the State of the Park Report and therefore not appropriate for inclusion in the special qualities. However, the relevant cultural aspects of communities are incorporated into a number of sections instead of being identified as a separate quality. Greater recognition of wild land qualities and the recreational and sporting culture associated with the area has been included.

Managing the Park in a Changing Environment (Section 3)

Comments

Generally respondents welcomed the recognition of the changing environment and the continual need for management to adapt and respond. Several suggested that more detail on likely changes should be given, including more explicit inclusion of economic, as well as social and environmental changes. Some suggested that greater attention should be given to climate change, and the likely implications and adaptation strategies, while others suggested that the Park Plan cannot do much to resolve 'global issues' that are beyond its scope.

There was general support for the principle of an integrated approach in progressing the four aims of the Park, but varied views on practical implementation. Some were concerned that the plan suggests conflict is inevitable, and sought a more explicit statement that the four aims of the Park should be achieved collectively. There was near universal recognition of the requirement to give greater weight to the first aim in cases of conflict, but caution that this should not mean greater consideration is generally given to this aim over and above the other three. On the other hand, there was some support for a clear statement about the importance of the natural and cultural resources and the first aim.

Some suggested that spatial zoning is a pre-requisite for good management, and reconciliation of potentially conflicting objectives. Others supported the approach of the plan in not dividing the Park into zones, suggesting that dividing into zones would be contrary to the aim of integrated management.

Changes made following consultation

Section 3 'Managing the Park in a Changing Environment' has been incorporated into new Section 3 'Context' at 3.3. It provides more detail on the key drivers of change affecting the National Park, namely climate change, population change, economic trends and national and international policy, and identifies what is contained in the plan to address these at the present time, as well as noting that these changes pose risks to the delivery of the plan.

'A Brief History of the Cairngorms' has been deleted from the section as it does not add to the plan. 'Managing Conflict' and 'Diversity within the Park' have been incorporated into 'An Integrated Approach'. This section has been amended to address the perception that conflict is inevitable between the first aim of the Park and the other three aims. Instead it emphasises the need for all four aims to be delivered collectively and in a co-ordinated way, and sets out the approach required by Section 9(6) of the National Parks (Scotland) Act – setting a context of sustainable development. It is now at Section 3.1.

The subject of zoning, formerly addressed in 'Diversity within the Park' is now referred to in 'An Integrated Approach', where the reasons against identifying different management zones are reaffirmed.

Guiding Principles

Comments

General
Several respondents noted the desirability of the principles, but questioned how they may be put into practice. Some suggested that rather then being passive principles, the plan should show how they can be enacted. There was one suggestion that the principles may confuse rather than guide, and two suggestions that a commitment to the protection of the natural heritage interest of the Park should be included as an over-riding principle.

Sustainable Development
There were conflicting views about the approach to the natural and cultural resources in the principle as drafted, with one response (NGO) welcoming the

recognition that the natural environment should not be compromised to allow sustainable development, and another (land managers) indicating that the natural and cultural resources should not be sacrosanct. There was some confusion or concern expressed in two responses (land managers) about the wording 'those *currently* living, working or visiting the Park', which instead of distinguishing from future generations, could be read as meaning that people outside the Park are not relevant.

Social Justice
One response (NGO) commended recognition of the need for access provision to reflect social justice. Another (individual) suggested that it is more realistic to refer to the maximum possible access. One (land manager) disagreed that it is a 'Park for All', suggesting that the values of the area and ability to make a living emanate from the fact that there are relatively few people, and encouraging too many will destroy many of the attractions and values that make the area special.

People Participating
Only three respondents commented on this principle. One (public) suggested that the Cairngorms National Park Authority and other stakeholders commit to using community-run businesses and facilities as a first priority. Another (land manager) would prefer to see a more "bottom-up" approach to management, while another (community) stressed the role that communities can play in delivering much of the plan, and the need to find effective ways of engagement and support for the community time and effort required for engagement.

Managing Change
One response suggested the plan does not recognise the difference between changes the Park can influence and those it cannot, and that there should be a more explicit statement about identifying and reducing future negative, particularly human-induced, impacts and shaping positive change. Two responses (land managers) suggested the plan should recognise that change is very difficult to achieve and requires a vibrant business sector unfettered by unnecessary barriers.

Effective Governance
There was general agreement in responses that co-ordination is desirable, but two (land manager and individual) stated that too much consultation can slow progress and that a balance is needed. One (business) suggested that building trust between the Cairngorms National Park Authority and other stakeholders should be top of the agenda.

Changes made following consultation

General
Guiding Principles under Section 3 'Managing the Park in a Changing
Environment' has been moved to a stand-alone Section 4. The section has
been amended to focus more on how the guiding principles can be put into
practice. The final paragraph 'Effective Governance' has been renamed
'Adding Value – A National Park that makes a difference' and now provides a
clearer statement that implementation of the plan should seek to add value
and how this might be done in the context of delivering positive and tangible
outcomes for the people and places of the Park.

Sustainable Development
This principle has been retained as 'Sustainable Development – A National
Park for today and for the future' and amended to re-emphasise the need for
a balanced approach to the aims of conserving and enhancing on the one
hand and sustainable development on the other. To avoid misinterpretation,
the word 'currently' has been removed from the statement on sustainable
development. Reference to the need to address climate change, one of the
greatest international challenges at the present time, has been added.

Social Justice
The principle of social justice has been retained as 'Social Justice – A National
Park for All' and expanded to include specific mention of developing social
inclusiveness initiatives and addressing barriers to inclusion, particularly in
three target groups, young people, people with disabilities and people on low
incomes.

People Participating in the Park
This principle has been retained as 'People Participating in the Park – A
National Park for people' and now focuses more on involving people within
and outside the Park in its management through capacity building and
encouraging active citizenship. The emphasis has been clearly placed on
developing mechanisms to support communities in their efforts to become
involved in the management of the National Park.

Managing Change
This principle has been retained as 'Managing Change – a National Park open
to ideas' and now includes a more explicit statement on the need to identify
and effect positive change, while preparing for and mitigating the potential
negative consequences of change that cannot be influenced.

Effective Governance

This principle has been renamed 'Adding Value – a National Park that makes a difference' and more clearly defines how this can be done by co-ordinating efforts, avoiding duplication and working together in an atmosphere of trust and co-operation.

Vision (Section 4)

Comments

General
There was general support for the vision, and while some responses endorsed it fully, several suggested that a stronger and more ambitious vision needs to be articulated. Some suggested it is too broad and process-based, too much about how the Park as an institution will be viewed, rather than about achieving desirable changes.

Conserving and Enhancing
While there was general support for the vision to be an exemplar of integrated management, concerns were expressed by some about the detail of species that are mentioned, in view of likely environmental changes. Two responses (NGO and public) would like to see a more explicit vision for wild land qualities, and two (individual) suggested the Park should be the "wild Park", one suggesting a non-intervention approach, the other large-scale restoration of native forest, while others stressed the importance of maintaining a working landscape. There were also suggestions that habitat restoration, particularly in upland areas, should form part of the vision.

Living and Working
There was concern expressed by some (public and individual) that stating 'all people will have access to housing and services that meet their needs' is unachievable. One response (individual) suggested economic activity is at odds with conservation, but another (NGO) suggested there is no evidence that economic activity is currently constrained by the environment and that a more positive vision for economic activity which does not compromise the environment should be included. Others also suggested that the vision should be more outward-looking and not focus solely on the economy within the Park boundary. Responses also suggested that the importance of local communities should be stated and that a vibrant, diversified economy should form part of the vision. One suggested explicit reference to the role of communities and businesses in leading enhancement of an IUCN Category V protected area.

Understanding and Enjoying

Two responses supported the direction set out in this part of the vision, while one (public) suggested a more ambitious vision for enjoying the Park is needed. Another was concerned that too many visitors will destroy what they come to enjoy.

Changes made following consultation

General

The Vision for the Park in 25 years time has been moved to Section 1 of the plan, to give it more prominence and provide a clear starting point from which the rest of the plan flows. The vision has been reformatted to provide a clearer, sharper vision statement for the Park, followed by a set of 25 year outcomes, in tabular format and under individual headings, showing the relationship between the state of the Park now, and in 25 years time.

Conserving and Enhancing
This section of the table has been amended to include a more general statement on landscape character, habitats and species and culture and traditions, a more explicit vision for wild land qualities, together with a commitment to maintaining an active and productive landscape.

Living and Working
The importance of sustainable communities has been emphasised, within a vibrant and diversified local and regional economy. This regional dimension results in a more outward-looking vision for the economy. A more positive vision for economic activity which does not compromise the environment has also been included.

Understanding and Enjoying
This section of the table has been amended to provide a more ambitious vision for enjoying and understanding the Park, with more explicit reference to responsible behaviour in terms of outdoor access, as well as raising understanding of the special qualities of the Park.

Conserving, Enhancing and Managing the Park (Section 5)

Landscape (Section 5.2.1)

Comments

There was general support for the landscape objectives, although some suggested that the exceptional value of the Park's landscape should be more

clearly stated. One (public) response would like to see greater integration of the natural and cultural landscapes, and two (land managers) noted a need to consider socio-economic requirements alongside landscape. There was a strong view expressed (public and NGO) that there should be greater emphasis and clarity on wild land and more detailed objectives to enhance the wild land characteristics that are seen as a special quality. Two responses (NGO and public) also expressed disappointment that there is not greater integration of natural and cultural landscape matters in the Plan.

Changes made following consultation

This section has been renamed 'Landscape, Built and Historic Environment' and is now Section 5.1.2 under 'Conserving and Enhancing the Natural and Cultural Heritage'. The introductory paragraphs now incorporate text previously appearing under former Section 5.5.1 'The Built and Historic Environment'. The strategic objectives have been re-ordered and now include strategic objectives from former Section 5.5.1. Amalgamating the two sections and amending the objectives provides closer integration of the natural and cultural landscape elements of the plan. An expanded Strategic Objective b) relating to wild land places greater emphasis on the need to conserve and enhance the sense of wildness in the montane area and expands the list of possible detractors from this experience.

Nature Conservation (Section 5.2.2)

Comments

There was general support among the responses for the objectives and the importance of biodiversity.

Responses suggested a clearer expression of how the biodiversity duty on public bodies should be implemented in the Park would be useful. Several responses welcomed the approach to habitat networks, but noted that the needs of individual species and habitats of importance must not be overlooked and will involve some trade-offs. On the other hand, some emphasised the need to look beyond designated sites and take a strategic approach, and suggested a stronger emphasis on habitat restoration, particularly upland and woodland habitats.

Several responses supported the principle of reintroduction of species, and suggestions were made for a number of particular species including beaver and lynx. Some expressed concern about potential impacts, and one referred to problems associated with existing introductions of game birds.

Two responses (public) indicated that geodiversity interests are not sufficiently covered, and need specific objectives to address research, understanding and conservation in relation to geodiversity features.

Changes made following consultation

This section has been renamed 'Biodiversity' and included in Section 5.1.2 'Conserving and Enhancing the Natural and Cultural Heritage'. Reference to geology and landforms has been moved to a separate section, with the focus now more clearly on biodiversity and habitat restoration. The box relating to the montane area has also been deleted to avoid confusion over the status of these objectives. These have been replaced by a new Strategic Objective d), which aims to restore the full range of montane habitats and ensure the montane area remains a national asset at the heart of the National Park and the outdoor access implications for the montane area are addressed in the outdoor access section of the plan (5.3.3).

A new section on geodiversity has been added, to give more prominence to geodiversity interests. The former Strategic Objective 5.2.2j) on raising awareness of the outstanding geology and geomorphology in the Park now appears as Strategic Objective b) in the new section. Soils have also been incorporated into this section. New objectives to safeguard geological and geomorphological features and to safeguard against large-scale extraction and removal of mineral resource have been added.

Soils (Section 5.3.1)

Comments

One response (land managers) recommended the plan should acknowledge existing soil conservation rules within the Good Agricultural and Environmental Condition obligation. Another (land manager) noted that soil disturbance is a natural phenomenon as well as something influenced by man, and that conservation should consider the economic, social and historical context and likely consequences of management.

Other responses looked for emphasis on the palaeo-environmental value of soils, stabilisation on steep slopes and a strategic approach to block drainage and restore upland soils.

Two responses (land managers) expressed surprise that no reference it made to mineral extraction in this section, suggesting extraction should be supported where it results in the net enhancement of the special qualities.

Changes made following consultation

Soils have been incorporated into the new section entitled 'Geodiversity' and Strategic Objective c) expanded to refer to all soils (see comments on Nature Conservation section above).

Water (Section 5.3.2)

Comments

There was general support for the strategic approach to water, in line with River Basin Management Planning, and for the objective to encourage more sustainable patterns of water use. One response (public) noted the need to integrate this consideration with business sustainability and cost-effectiveness.

Several responses suggested a stronger objective to prevent building on floodplains, and one (NGO) suggested promotion of large-scale floodplain restoration projects.

There were requests for greater mention of land management practices, including the extent to which agriculture is already regulated, the need to maintain productive farm land on floodplains, and also the impact that land management can have on the historic environment features associated with rivers.

Other issues raised included the potential for woodlands to play a key part in catchment and flood management and the issue of erosion of riverbanks by grazing.

Changes made following consultation

This section now appears under renamed Section 5.1.3 'Sustainable Use of Resources'. Strategic Objective d) has been strengthened to ensure new development is free from the risk of flooding, reflecting national policy. Overall no significant changes have been made to the strategic objectives in this section.

Air (Section 5.3.3)

Comments

There were two responses (community and individual) that welcomed the objective to minimise light pollution, but one response (public) suggested this is not compatible with aspirations for household growth given infrastructure requirements. However, another (community) suggested much street lighting is unwanted by residents and should be removed in rural areas.

The need to address local issues of air pollution was raised, as was the issue of noise from road transport and low flying jets. One response (NGO) suggested a need to emphasise the spiritual enjoyment of "peace and quiet'" as well as the physical qualities of the air.

Changes made following consultation

This section now appears under renamed Section 5.1.3 'Sustainable Use of Resources'. Strategic Objective b) relating to retaining dark night skies and minimising light and noise pollution has been expanded to ensure that transport and settlement planning maintain and enhance the qualities of tranquillity and sense of wildness. The reference to fresh air and lack of air pollution in the introductory paragraph has also been expanded to include peace and quiet as qualities that people enjoy in the area.

Integrated Land Management (Section 5.4)

Comments

There was broad support for the objectives for land management as a whole, particularly for integration. A number of responses identified the changing economic and policy context and suggested this should be addressed in more detail or acknowledged more explicitly.

Some would welcome greater emphasis on integration of particular aspects, including agriculture and forestry; moorland management and recreation; and cultural heritage interests.

There was broad support for the aspiration towards a vibrant and viable land management sector, but suggestions that more emphasis could be given to contributing to economic sustainability, particularly the development of local supply chains, and suggestions were made on improving marketing advantage. However, one response noted that some produce will always have to be sourced outside the Park.

There was support for integration of land management support systems and for setting priorities relevant to the area. One response (land manager) stated that proposals for more government regulation will make land management less viable, and that objectives should be determined by land managers. Others suggested the need for a broader range of interests to be involved in decision-making. Some responses sought more detailed policy on developing specific land management schemes.

Some responses noted the practical difficulties of making land available for new entrants and query how this can be implemented, while noting it would be desirable, subject to new entrants having the necessary skills. One response suggested the main constraint is agricultural holdings' legislation.

A number of responses sought more integration of the land management objectives with other sections of the plan. One (NGO) suggested this section should be in an overarching position in the plan. This response also suggested the need for an additional section on management of land for nature conservation as a separate land-use.

Changes made following consultation

This section has been re-numbered 5.1.4. The initial introductory paragraph now contains explicit reference to the challenges posed by economic trends and changing international policy. The focus of Strategic Objective 5.1.4a) has been expanded to encompass both viability and productivity of the land management sector.

Farming and Crofting (Section 5.4.1)

Comments

There was widespread support for the objective to maintain a productive and viable agricultural sector, and a number of responses emphasised the importance of this and its influence on other aspects of the Park.

One response noted that under new EU support arrangements the incentive to farm is reduced, and therefore support mechanisms to deliver public benefits will have to overcome this. It also drew attention to the difficulty of delivering support through non-farming activities in remote areas. It suggested the Park can only make a difference at the margins of the European support system, and at the very least should ensure that conserving and

enhancing the special qualities is consistent with sustainable businesses and aid diversification and marketing of farm products.

The need to manage environmental impacts of farming and crofting are highlighted in a number of responses, including issues of grazing animals impacting on water quality, noxious and invasive weeds and restoration of appropriate field boundary features.

Changes made following consultation

This section is now unnumbered under Section 5.1.4 'Integrated Land Management'. Strategic Objective b) has been expanded to highlight the importance of agricultural businesses contributing to the economy and employment in the area. There are no other significant changes to this section.

Forestry (Section 5.4.2)

Comments

Many responses endorsed the importance of the forest resource, and particularly the native woodland character. In terms of forest cover, there were a number of responses which aspired to native woodland expansion and suggested targets should be set, with support for the further development of forest habitat networks. One (NGO) also suggested that the ratio of native to non-native trees should increase, and emphasised the importance of planted ancient woodland sites for restoration. One response (land manager) noted that much existing stock is from imported seed, and that planted stock should not necessarily have to be of local origin.

There were, however, some responses expressing caution about expansion of forest cover. One (individual) suggested that there may be little room for expansion in some areas, another that expansion may reduce the value of some landscape views, and another warned of the increased fire risk and deer management costs. There was also concern that native woodland expansion must be balanced with productive forestry. There was some support expressed for restoring moorland in appropriate places where the desire to conserve and enhance the natural heritage justifies this.

In terms of forest uses, there was a significant number of responses that argued for greater prominence to be given to recreation and tourism and productive forestry. Several responses noted that multiple objectives are desirable, but not always appropriate in every case. Suggestions included reference to the health agenda of forest recreation, the use of new technologies

in processing timber products, timber as a fuel source, housing and construction opportunities, and the cultural significance of forests.

There were a number of references (land managers and public) to the economic difficulties of managing forests and the need for viable businesses and a suggestion for greater emphasis on the need for integrated support for farm woodlands and processing.

Changes made following consultation

This section has been renamed 'Forest and Woodland Management' and expanded to highlight the economic, tourism, community, health and environmental benefits to be derived from forestry. The strategic objectives have been re-ordered, and reworded to reflect more closely the Scottish Forestry Strategy. The focus is on enhancing the condition of woodlands, rather than simply maintaining the existing woodland cover, as well as increasing the value of local forest products. The support for a mix of native and non-native species remains unchanged, as does the reference to using seed of local origin where expansion is through planting rather than natural regeneration.

Strategic Objective d) (formerly 5.4.2e) has been reworded to provide a clearer focus on the need for active management and investment in increasing the value of local forest products, strengthening supply chains and developing new markets. Strategic Objective e) has been added to encourage the continued development of forests and woodlands as a major asset to sustainable tourism. A new Strategic Objective g) has also been added, to contribute to national efforts to address climate change through both mitigation and adaptation.

Moorland Management (Section 5.4.3)

Comments

There was support expressed for the value of moorlands in the Park, and a suggestion from one (land manager) that there should be a greater description of why moorland is managed – for grouse shooting and the associated socio-economic benefits. One (NGO) suggested the plan should be clear that management for shooting purposes should only be encouraged if there are negligible environmental disadvantages. One response also hoped the objectives will address worries over the presumption against forestry on moorland.

The importance of a particular rare moorland habitat (NVC H16) present in the Park was highlighted, and there was a suggestion for research into possible moorland management options.

One response (NGO) suggested a prominent objective to ensure that persecution of threatened birds of prey on moorland ceases, and others suggested that a positive approach to dealing with wildlife crime is needed.

Changes as a result of comments

The introductory paragraphs now contain specific reference to the purpose of much moorland management being for grouse shooting and its socio-economic significance and connection to the cultural heritage of land-use in the area. Strategic Objectives a) and c) now focus on enhancing rather than maintaining and managing moorland, both as a resource and in terms of its interaction with surrounding land-uses.

Wildlife crime is addressed in the Action Programme for Priority for Action 6.1 'Conserving and Enhancing Biodiversity and Landscapes' at 3h and 3i.

Deer Management (Section 5.4.4)

Comments

There was a common view in responses of the importance of deer management in the Cairngorms. Responses also noted the current arrangements for co-ordination through Deer Management Groups. One response (land managers) reported being "a little encouraged at the relatively positive approach to developing the objectives" and suggested more explicit recognition of the socio-economic value of deer would be helpful. Other (individual) responses believed that red deer numbers need to be substantially reduced in many areas. One response highlighted the impact on cultural landscapes and indicated this should be considered in a deer plan.

On the other hand, some responses pointed to a tendency to perceive deer as a problem, when in fact they are the principal iconic species of Scotland. One response argued for an holistic approach to deer management, and a profile equivalent to landscape and habitats. It also noted natural heritage goals may be in conflict with the policies of those who own the land and may have detrimental economic impacts. Another response was concerned about reference to 'regular assessments of habitat impact' which it said appears to overrule the individual manager's right to determine his/her management regime.

There was caution about best practice guidance, which was noted as incomplete and not universally agreed. The same response also suggested the plan should not simply adopt the long-term strategy of another government agency (DCS) when this is under review, and should support the continuance of close seasons.

One response (NGO) argued for a statement of presumption against deer fencing, while another (land manager) argued that fencing is a legitimate and valuable management tool. Several suggested the plan should endorse the joint agency statement on deer fencing.

Several responses noted the wording which appears to state that sika deer are a valuable part of the natural heritage and suggested that the plan should address ways to reduce sika numbers and minimise the opportunity for muntjac deer to become established.

Changes made following consultation

The introductory paragraph has been amended to state clearly that red and roe deer are significant assets to the Park, but does not include reference to sika deer. An action to prevent the further spread of sika deer has also been included within the priority for action 'Supporting Sustainable Deer Management' (6.3).

Strategic Objective a) has been amended to make explicit reference to maintaining and enhancing the special natural heritage qualities of the Park rather than simply being consistent with them.

Strategic Objective e) has been amended to more closely reflect the wording of the Joint-Agency Statement on Deer Fencing. The need to minimise the impact of fencing on public safety, deer welfare, biodiversity, landscape, cultural heritage and recreation has been re-emphasised in the explanatory text under Strategic Objective e).

Fisheries Management (Section 5.4.5)

Comments

Two responses (land managers) indicated the issue of non-native fish needs careful consideration, as there are circumstances in which stocking of rainbow trout can be appropriate. Another response (NGO) highlighted the potential adverse impacts of 'put and take' fisheries on native fish stocks. Two

responses (community and NGO) highlighted the importance of migratory
fish and the need to enhance their environment, and one (public) noted a need
to address conflict between angling and other sports in some places.

Changes made following consultation

A sentence has been added to the introductory paragraph highlighting the
national and international importance of the Rivers Spey and Dee, both in
terms of biodiversity and contribution to the outstanding landscape of the
Cairngorms. No other changes have been made to this section.

The detailed management issues for non-native fish are noted but are not
appropriate for further expansion in the National Park Plan, while issues
relating to outdoor access and rivers are addressed under Section 5.3.3
'Outdoor Access and Recreation'.

Built and Historic Environment (Section 5.5.1)

Comments

A number of responses urged a more integrated approach to cultural heritage
across the plan. In particular, links between cultural heritage and natural
heritage, land management, tourism and recreation were highlighted. There
was also concern that the objectives focus mainly on sites, monuments and
buildings, with insufficient reference to the wider historic environment.

While most agreed with the objectives, a number of responses suggested more
detail is needed. Particular issues raised included a need to preserve the
drystone heritage, availability of materials to conserve vernacular buildings,
protection for non-statutory sites and the need for more information. One
response suggested a scheme to provide financial assistance to upgrade and
adapt historic buildings for new uses.

Overall, several responses suggested cultural heritage should have a higher
profile in the plan.

Changes made following consultation

This section has been incorporated into Section 5.1.2 'Conserving and
Enhancing the Natural and Cultural Heritage' under 'Landscape, Built and
Historic Environment' to give the strategic objectives for cultural heritage
more prominence. Combining the sections also achieves greater integration of
the natural and cultural landscape elements of the plan and allows linkages to

be made to the wider historic environment. Greater cross-referencing to cultural heritage in other sections of the plan also strengthens integration.

Culture and Traditions (Section 5.5.2)

Comments

There was general support for the objectives and the importance of local cultures, particularly oral history and local archives. There was a strong view expressed in a number of responses (public and individual) that reference to language, and specifically Gaelic, should be made in this section, including objectives to promote the use of Gaelic and recognition of Gaelic heritage.

Alongside Gaelic, the Doric tradition was also noted in some responses with one suggesting a use of Doric on signage in the east of the Park.

Changes made following consultation

This section now appears under Section 5.1.2 'Conserving and Enhancing the Natural and Cultural Heritage', with specific mention made in the introductory paragraph to the influence of Gaelic and Doric on the identity of the Park and its communities. The strategic objectives remain unchanged and relate to supporting and developing understanding of the cultural traditions of communities within the Park.

Communities Living and Working in the Park (Section 6)

Economy and Employment (Section 6.2)

Comments

There was general support for these objectives in the responses, but also a view that the plan does not set out a strong enough or full enough vision and approach for the development of the economy. A number of responses suggested the plan should tackle more explicitly the major challenges facing the economy, the future opportunities and link to the economy of the wider region.

Two responses (public and land manager) felt the section focuses too heavily on 'green' business without setting out a view for the wider economy, and that diversification from a tourism base is needed. One (land manager) suggested the tone implies development and growth is automatically in conflict with conservation. One (public) suggested greater emphasis be placed

on improving the green business practice of existing businesses, which will require support.

One (public) suggested the objectives do not go far enough to deliver the vision of all people finding employment that meets their needs. Another response (business) suggested that sustainable businesses will bring about sustainable communities and that more focus is needed on businesses rather than communities. It also felt that the changing mix of businesses away from traditional land-based activities is not sufficiently recognised.

There was general support for the objective to encourage entrepreneurship, but concern at the lack of premises for new business start-ups, and the need for start-up advice, information and funding was identified by two responses (land managers). One (land manager) suggested a better balance of tourism and productive sector activities is needed and that private investment is currently discouraged by the public sector.

Changes as a result of comments

This section has been re-numbered 5.2.3 and has been revised to recognise more explicitly the interactions with the wider regional economy and the role the National Park can play in contributing to wider regional enterprise and growth ambitions. The section includes more reference to the need to strengthen the sustainability of the broader economy in the Park, while at the same time ensuring economic and community development complements the conservation and enhancement of the Park's special qualities.

Strategic Objective 5.2.3a) has been amended to recognise the strategic location of the National Park in the regional economy, and the need for the Local Plan to support business development through appropriate policies and land allocations. Strategic Objective 5.3.2d) has been amended to focus on the diversification of the economy beyond the tourism and land management sectors on which it is currently heavily reliant. The issue of access to employment opportunities is covered by Strategic Objective 5.3.2e).

Former Strategic Objective 6.2g) on population level and mix has been moved to Section 5.2.2 'Sustainable Communities' Strategic Objective a). Strategic Objectives 5.2.3g) and 5.2.3h) have been moved from original Strategic Objectives 6.3a) and 6.3c) under 6.3 'Education and Training', thus highlighting the role of education and vocational training in meeting the needs of local businesses and school leavers.

The issue of sustainable communities is now addressed in Section 5.2.2, where the emphasis is on communities as a whole, to which sustainable businesses contribute.

Education and Training (Section 6.3)

Comments

Comments on this section highlighted the need to view adult learning in a broader context, the need to acknowledge the role of the University of the Highlands and Islands and the need for vocational training. One response also expressed confusion over the terms used and the interactions with other parts of the plan which leads to a lack of a strategic focus on this subject, with learning objectives spread throughout the plan.

The schools groups expressed a desire to see greater diversity of training and labour opportunities, particularly an increase in apprenticeships and opportunities beyond the tourism sector. They also felt there is a relatively limited range of subject options during school education that limits their future options.

Comments from cultural heritage stakeholders highlighted the need to improve provision of traditional skills training, to enable conservation of the cultural heritage.

Changes made following consultation

The former Section 6.3 'Education and Training' has been removed and its strategic objectives incorporated elsewhere in the plan to draw together objectives for learning in one place, and address the links to economy and employment.

Former Strategic Objectives 6.3a) and c) on access to vocational training and matching training provision and current/future skills have therefore been moved to 5.2.3 'Economy and Employment'. Strategic Objectives 6.3b) and 6.3d) on educational resources and opportunities for volunteering have been moved to Section 5.3.4 'Learning and Understanding', where they complement broader learning and understanding objectives.

The focus in Strategic Objective 5.3.4b) is now on learning in its broadest sense, both formal and informal (for example, outdoor education and outreach work), rather than on education in its traditional sense. Strategic

Objective 5.3.4d) links volunteering to promoting a greater awareness and understanding of the special qualities of the area.

Sustainable Tourism (Section 6.4)

Comments

There was general support for the approach to sustainable tourism and recognition that this is closely aligned with national and regional priorities, although some links in the regional context could be strengthened. There was a view that the plan could be more ambitious about the potential of the National Park to be a significant tourism asset to the region and Scotland. Two suggested a greater emphasis on "tourism is everybody's business".

Some respondents requested a clearer definition of 'sustainable tourism'. One asked why the word 'sustainable' has been explicitly included in this heading but not others and suggested the emphasis is on sustaining the tourism industry rather than sustaining the environment. It also noted that aspects of energy use are not encompassed. Two (NGO and land manager) expressed concerns about the environmental impacts of too many visitors, and one noted that tourism is a major cause of the lack of affordable housing, but that this is not mentioned.

One (business) felt tourism's importance as a major economic activity and land-use is not given sufficient regard in the plan, and that there is insufficient cross-referencing to other policy areas. It also suggested more reference be made to food and drink and the history of tourism in the area.

Two responses (NGO and public) highlighted the need to consider transport issues in tourism, and the associated environmental impacts.

Some responses also indicated a need to develop the infrastructure and quality of the tourism experience, suggesting that provision of appropriate accommodation is a key requirement in some areas, and support for local tourism initiatives is needed. A need for an agreed message and statement on the distinctiveness and selling points of the Park for use across the tourism industry was noted in several responses.

Changes as a result of comments

The former Section 6.4 has been moved to Section 5.3.2 under 'Enjoying and Understanding the Park', and combined with former Section 7.3 'Visitor Services'. This gives a clearer structure and a more integrated approach to

tourism and visitor services, while Section 5.3.1 now provides a clear statement of the Park's distinctiveness and unique selling points. An introductory paragraph has been added to Section 5.3.2, highlighting the potential to become a world-class tourism destination which can make a significant contribution to the regional and national economy.

Further text has been included, providing a clearer definition of sustainability and linking its principles directly to tourism. An explicit emphasis on the fact that tourism in the Park is 'everyone's business' has been added, alongside reference to the need for collective commitment to the delivery of high quality services.

The importance of transport infrastructure to tourism sustainability, together with the challenge of minimising any negative impacts on the landscape, is addressed within Section 5.2.5 'Transport and Communications'. Section 5.3.2's original strategic objectives have been re-ordered to reflect the importance of raising awareness of the Park as a premier, year-round, rural tourism destination, recognised for its outstanding natural heritage and its National Park status. The strategic objectives relating to former Section 7.3 'Visitor Services' have been incorporated at 5.3.2f) to 5.3.2k).

Transport and Communications (Section 6.5)

Comments

A number of responses felt the plan fails to give sufficient recognition to the Park's role as an inter-regional transport and transmission corridor, and its associated role in the region's economic development. Several responses (public and individual) suggested that the plan should give explicit support for dualling of the A9 and rail improvements, and suggested greater integration and reference to regional transport strategies.

Further reference to community transport was suggested, and greater cross-referencing to tourism and recreational transport.

The schools forums viewed transport as an important issue and described current provision as inflexible, expensive and unpredictable. It was seen by young people as a barrier to work, education and social activities. Communities also highlighted transport as a key issue and a barrier to many other objectives.

Greater emphasis on using new technologies, including broadband to support small and medium-sized businesses, was suggested.

Changes made following consultation

Former Section 6.5 'Transport and Communications' now appears at Section 5.2.5. An introductory paragraph has been added, linking transport to tourism and community sustainability, and recognising the regional and national transport networks that run through the Park. A new Strategic Objective 5.2.5b) has also been added, focusing on transport improvements which support socio-economic development, while meeting high standards of environmental management. The degree of emphasis on the use of new technologies to support small and medium-sized businesses remains unchanged. The links between transport and outdoor access have also been strengthened in the Priority for Action 'Providing High Quality Opportunities for Outdoor Access' (6.4).

Housing (Section 6.6)

Many responses supported the focus on affordable housing, although some suggested that the objectives should also recognise the wider housing market. Some responses perceived an emphasis on constraint rather then enabling. There was, however, wide support expressed for the aspiration to address affordable housing issues. A number of responses suggested alterations to the detail of these objectives. One advised against any use of the term 'perpetuity', suggesting that 'long-term' would be more realistic. There was also caution expressed about whether Rural Housing Burdens and Local Lettings Initiatives will increase access to affordable housing, when the lack of housing is the main problem.

Several responses highlighted the link between income levels and house prices, and the need to take an holistic approach. Other suggestions to address affordable housing included direct funding to provide serviced plots and kit houses, group land purchase and building initiatives, reduction of regulation, incentives for conversion and renovation and release of more land for housing.

Two responses (public and business) were concerned at the lack of a detailed housing strategy in the plan to provide a context for settlement development and the wider development of the economy. Several suggested release of more land for housing, including land allocated specifically to affordable housing, is a key objective.

A number of responses referred to design and infrastructure objectives. There was support for the use of local materials and sustainable design, although a

note of caution in one (business) that meeting the highest standards is an aspiration. In particular, responses suggested placing strict biodiversity conditions on developments, use of conservation planning gain, use of woodfuel energy, use of lime mortars and masonry on traditional buildings and included recognition that innovative design should be encouraged.

Some responses also referred to current restrictions on water and sewerage infrastructure that constrain settlement development.

Changes made following consultation

Former Section 6.6 'Housing' now appears at Section 5.2.4. The text has been expanded to provide more detail on population projections and income levels within the Park and their relationship to the housing market as a context for the objectives. The reference to local lettings initiatives has been deleted from Strategic Objective 5.2.4a) and replaced with a reference to Section 75 planning agreements as a more suitable mechanism to ensure housing remains affordable to those who need it in the long-term, rather than in perpetuity. The reference to the Housing Action Plan has been deleted from Strategic Objective 5.2.4b), thereby widening the focus of partnership working.

The objective to improve the sustainability of design has been retained, and the detailed comments received on this and land allocations will inform development of the Local Plan.

Overall, the revised plan provides more strategic context for housing through Section 5.2.4 Housing and Section 5.2.2 Sustainable Communities, both of which provide more information and context for the Local Plan.

Renewable Energy (Section 6.7)

A number of responses suggested the plan would be strengthened by adopting targets for renewable energy use and generation. One (individual) suggested consideration should be given to the Park's ability to offset the carbon generation resulting from large numbers of visitors and another (individual) that the Park could and should be self-sufficient in energy.

Several suggested the scope of the section should be broadened to make reference to efficient house design and other fuel sources, including a strong view that woodfuel should be addressed specifically given the Park's woodland resource.

While there was agreement with the proposed support of small and medium-scale generation schemes, one response (public) felt there is no reasoned justification for a presumption against large-scale commercial generation. One response (individual) indicated that it would expect to see an explicit statement on pylons and wind farms.

Changes made following consultation

Section 6.7 'Renewable Energy' has been moved to Section 5.1.3 'Sustainable Use of Resources' under Energy to place more emphasis on the need to supply and use energy in a sustainable way. Former Strategic Objective 6.7c) on promoting the Park as a suitable place to develop renewable energy research has been removed, while support for small and medium-scale generation schemes remains (Strategic Objective a) under Energy). This encouragement has been extended explicitly to the business sector as well as the community and domestic sectors.

No specific targets have been adopted for renewable energy use or generation in the plan, although these should be addressed through the monitoring framework. Efficient house design is addressed in Section 5.2.4 'Housing' under Strategic Objective 5.2.4c) which aims to improve the physical quality, energy efficiency and sustainable design of housing in all tenures throughout the Park.

The plan sets out a general statement on large scale wind farms being inappropriate due to natural heritage and landscape impacts. Together with the strategic objectives for 'Transport and Communications' (Section 5.2.5), the plan provides a framework to inform future decisions on individual infrastructure proposals.

Waste Management (Section 6.8)

Comments

There was general support for the objectives, but also a view that the scope of them could be broadened to reflect the whole waste management sector. One suggested broadening the text to include all waste materials including energy, business waste, and air emissions. A general point made was that the section could be more specific so that progress can be monitored.

A number expressed concern that, while desirable, it is unclear how the objectives could be achieved. They noted a need to integrate more closely

with local authority waste strategies, and be clear about exactly what national targets the plan aims to meet.

A number of responses suggested greater emphasis on waste reduction, 'zero waste' principles and the need for greater awareness. One (public) highlighted a need for strategic minerals data and policy to manage landfill sites. Two responses (land managers) urged a zero tolerance approach to litter in the Park. A need for education and awareness-raising was also noted in responses.

Communities placed a high priority on improving waste management facilities.

Changes made following consultation

This section has been re-numbered 5.2.6. The reference in former Strategic Objective 6.8a) to exceeding national targets for better waste management has been removed to achieve consistency with other objectives, resulting in an amended Strategic Objective 5.2.6a) to minimise waste and encourage better waste management through community and domestic-scale recycling facilities. Former Strategic Objective 6.8c) has been deleted, as it effectively repeats the content of Strategic Objective 5.2.6a). The section retains its domestic and community-scale focus and has not been broadened to include the whole waste management sector. Energy use is addressed separately in Section 5.1.3 'Sustainable Use of Resources'.

While no specific targets have been set for waste management, Strategic Objective 5.2.6b) recommends the adoption of a 'Zero Waste' approach, which raises awareness of the impacts of producing and processing waste and increases the number of local composting, re-use and recycling projects through partnerships between community initiatives, private waste companies and local authorities.

Strengthening Communities (Section 6.9)

Comments

There was general support for the vision of thriving communities, but varied responses to the objectives. One (community) response felt inadequate coverage is given to community issues, particularly the economic and social viability of settlements. Another (land manager) was concerned at the complexities of involving communities in decision-making processes and about the representative nature of Community Councils. Some suggested that

more could be made of community planning as a means of integrating community engagement in an area, and one (community) noted the need to find ways to support communities with the workload of increased engagement.

Three responses (public and individual) noted the need to consider service provision, given future population trends and the support needed for this.

Community meetings suggested that there should be a higher profile for local communities throughout the Plan, and in particular, that they should be included as partners for most actions. There was a suggestion that more should be made of local skills and knowledge, and that communities should be used more often to deliver relevant work for the Park.

One response (business) suggested that this section should be re-titled 'Strengthening Businesses', on the basis that if businesses become sustainable then communities will automatically become sustainable. It also noted that publicly-funded, community-run businesses can distort the market place.

Changes made following consultation
This section has been moved from Section 6.9 to Section 5.2.2 and has been renamed 'Sustainable Communities' to provide more context for section 5.2 as a whole. More detail is now provided on population projections and trends and the challenges they pose to creating and maintaining sustainable communities, particularly in the areas of economic activity and service provision. Former Strategic Objective 6.2g) in Section 6.2 'Economy and Employment' has been moved to become Strategic Objective 5.2.2a) which encourages a population level and mix in the Park to meet current and future needs of its communities and businesses. A new Strategic Objective 5.2.2b) has been added to encourage settlement growth in the main settlements and plan for growth to meet community needs in other settlements.

The focus remains on communities as a whole, and not simply businesses. Objectives to strengthen the sustainability of businesses are included in Section 5.3, and contribute to the objectives for sustainable communities.

The importance of Community Planning has been highlighted in Strategic Objective 5.2.2c) by specifying that the provision of local services to meet community needs should be done via the Community Planning process. A clearer definition of the process has also been provided in the box entitled 'Community Planning'. Strategic Objective 5.2.2d) places increased emphasis on the need to support the development of community capacity by building

on existing networks, expertise and experience to create effective community councils, associations and networks.

Communities are also included as delivery partners for many of the individual actions relating to the Priorities for Action, in line with consultation responses.

Understanding and Enjoying the Park (Section 7)

Outdoor Access and Recreation (Section 7.2)

Comments

There was a general recognition in the responses of the importance of outdoor access, and in particular the need to develop a working understanding of responsible access among all interests. A number of responses suggested this section could be broader and more ambitious in its scope.

In particular, one response (public) strongly recommended a more ambitious approach that explicitly seeks to increase further the already high quality recreational experiences – there was a sense that the current draft does not go much further than implementing the new access legislation in common with the rest of Scotland. It also suggested that the links between access and other aspects of the Park, natural and cultural heritage, tourism, land management etc, should be more explicitly stated in order to set an agenda for integrated management. Several other responses also suggested greater cross-referencing with tourism and land management.

Another response (public) recommended the plan should take a more positive approach to promoting enjoyment of recreation. It suggested that the draft focuses heavily on outdoor access and the associated statutory obligations, but not enough on the broader range of recreational opportunities in the Park, nor the need to actively promote responsible enjoyment of these. In several responses, it was suggested that the current wording is more about managing the impacts of recreation rather than promoting its enjoyment.

There was a common view that the concept of mutual respect and responsible access is key to the behaviours of both access managers and those enjoying access, and one (land managers) suggested an enquiry service to assist understanding. There was also caution expressed by some (NGOs) and the suggestion that there must be safeguards to guard against over-development and to conserve the element of wildness, and that the plan should be more robust in stating that access provision should not compromise the special

qualities. Another response (public) also suggested it is important to state that some recreational activities can take place in fragile areas if properly managed.

The schools groups recognised the outdoor opportunities, but expressed frustration at barriers to participation including affordability and transport.

Changes made following consultation

This section has been re-numbered 5.3.3 and the introduction expanded to specify the range of quality outdoor access and recreation opportunities available in the Park and the need maintain this. Reference to the Scottish Outdoor Access Code has been deleted to avoid overemphasis on statutory obligations and managing the impacts of recreation; the emphasis is now on promoting responsible enjoyment of the Park that does not adversely impact on its special qualities.

Greater links are made between responsible outdoor access and other public policy agendas including social inclusion, improving health and transport and overall quality of life. More explicit links have also been made to tourism, the natural environment, communities and the economy. To address concerns about a lack of proactive emphasis on recreation, a new Strategic Objective 5.3.3d) has been added to ensure adoption of a strategic approach to forward planning for outdoor recreation opportunities.

Visitor Services (Section 7.3)

There was general support expressed for these objectives, and a suggestion in one response (public) that the section could also better highlight the positive impacts of enjoyment and recreation. An additional objective was suggested by one response (public) that explicitly supports tourism development in promoting opportunity and encouraging investment and employment.

One response (NGO) felt that visitors are subtly treated as persons to be excluded, accommodated and entertained, rather than people with a stake in and extensive knowledge of the Park, thereby failing to recognise the range of people that feel some connection to the area and are regular visitors.

Changes made following consultation

This Section has been incorporated into Section 5.3.2 Sustainable Tourism. The positive impacts of enjoyment and recreation have been highlighted in the

amended introductory paragraphs of Section 5.3.3 'Outdoor Access and Recreation'. Strategic Objective 5.3.2e) of Section 5.3.2 'Sustainable Tourism' already addresses strengthening and maintaining the viability of the tourism industry in the Park and the contribution it makes to the local economy.

Learning and Understanding (Section 7.4)

Comments

The responses recognised the importance of learning to the long-term success of the Park, and several suggested it should be given more emphasis and be better joined-up throughout the plan. Several sought a broader focus on learning, emphasising the international context, and others sought more emphasis on the national role of the Park in learning and a wider vision of the role the Park can play in the learning resource of Scotland.

One (land manager) sought more emphasis in particular on responsible behaviour in the countryside and the interpretation of natural and historical features and land management.

Changes made following consultation
A new first paragraph has been added to this section specifically highlighting the role of the Park in developing learning, understanding and experience, while the national and international role of the Park as a learning resource is already stated in the final introductory paragraph.

Former Strategic Objectives 6.3.b) and 6.3.d) relating to development of educational resources and volunteering opportunities have been incorporated into re-numbered Section 5.3.4. The emphasis in Strategic Objective 6.3.b) has been placed on learning as a mix of formal and informal opportunities, adding training facilities and outreach work to the range of opportunities which should be pursued. Strategic objectives have been re-ordered to reflect incorporation of Strategic Ojectives 6.3.b) and 6.3.d). Responsible outdoor access is dealt with in Section 5.3.3 'Outdoor Access and Recreation'.

Implementation (Section 8)

Comments

There were several comments on implementation of the plan, directly in relation to Section 8 as well as more general observations. These covered two broad areas – partnership and resources.

A number of comments supported the partnership approach and noted that this is vital for delivery. Several emphasised the need to engage effectively with the private sector and communities, suggesting that the plan seems focused largely on the public sector. Some were concerned that implementation relies largely on voluntary partnerships, and that the plan does not address all the constraints and practicalities. In some responses, clarity was sought on the role of the National Park Authority in delivery and the relationships between other partners.

Community meetings emphasised a need to use expertise within communities and find effective ways to enable communities to deliver many aspects of the plan.

In terms of resources, a number of responses highlighted concerns that the plan does not carry with it resources for implementation, and therefore there is a danger of not delivering. One (NGO) suggested that other areas of lower priority could be noted for delivery if resources allow. Several noted the role of the Local Plan in delivering many objectives and stressed the need for good integration between the two plans. Some also sought more clarity on how aspects that are not in the priorities for action should be pursued.

Changes made following consultation

This section has been re-numbered Section 7 and expanded significantly to contain new paragraphs on adding value, investment, research, the Cairngorms National Park Authority's role in implementation, the role of other plans and strategies, and challenges and risks.

To provide clarity on the role of the National Park Authority in delivery and the relationships between other partners an Implementation Framework has been included; this identifies the formal mechanisms for bringing together the necessary delivery, advisory and strategic partnerships and provides details of their respective roles as a starting point for implementation.

Section 7.2 addresses the question of adding value to the existing activity and policy context within the Park through alignment of corporate plans and greater co-operation between and within sectors. Section 7.3 goes on to highlight the National Park Authority's role in achieving greater co-ordination of public investment between bodies and around the aims of the National Park. Paragraph 2 of the former Section 8.1 'A Partnership Approach' has been expanded in Section 7.5 to clarify the role of the National Park in co-ordinating and reporting on implementation of the Park Plan.

Section 7.6 details how implementation of the National Park Plan relates to other plans and strategies, including the Local Plan, and the role of these plans and strategies in implementation, while Section 7.7 sets out the essential requirements for success of the Park Plan, together with the risks to its successful delivery.

Monitoring and Review (Section 9)

Comments

Responses from several organisations indicated they would like to be actively involved in selecting and monitoring the state of the Park indicators. Some pointed out that they currently hold data or could be of assistance in collecting data.

Several responses agreed with the need for robust indicators, although some suggested more detailed provision is required while others suggested it may be desirable to have fewer indicators. Two responses (NGOs) expressed disappointment that further detail on indicators was not included within the Draft Plan. At an overarching level, one response (individual) wondered what it is about the National Park that could be a model for other protected areas.

A range of suggestions for particular indicators was made as follows:

Theme	Suggestions for indicators
Landscape Change	Visitor appreciation through surveys by locality
	Land cover and habitat networks
	Extent and location of built development and associated disturbance to tranquillity
	Impacts on Inventory landscapes
	Numbers of households in need as expressed in housing needs survey/local housing strategy
Affordable Housing	Levels of investment in new affordable housing through Communities Scotland
	Numbers on housing lists by area
	Rent levels as % of national average
	House prices by house type as % of national average
	Sustainability index as % of national average
	Travel to work distances of people with jobs in the Park
	Ratio of waiting list applicants to number of lets
	Number of households in poor energy rated houses using NHER and/or SAP ratings

	Number of houses below the Scottish Housing Quality Standard
	Relationship between income and rent levels using SCORE data
	House price trends, particularly private sector entry level prices
	Numbers on housing lists by area
	Rent levels as % of national rents
	House prices compared to national data
	Sustainability index
	Travel to work distances
	Ratio of number of waiting list applicants to the number re-housed (excluding tenants and those with no housing need) as used to determine pressured area status
	Number of waiting list applicants housed by private sector landlords who have accessed grants
	Number of waiting list applicants housed by take-up of low cost housing for sale (or other form of equity purchase)
Seasonal Employment Rates by Sector	Wage rates as % of average
	Average earnings
Agricultural Activity	Farm rent levels as % of Scottish average
	Workforce decline/part-time working
	Amalgamation (holding size distribution)
	Change of use (eg to forestry)
	Simplification (eg decline of mixed farming)
	Intensification (eg elimination of non-productive land)
	Include series of measures provided by Land Management Contracts
Biodiversity	Condition of notified features on designated sites
Water Quality	River water quality (as monitored by SEPA) as an interim indicator until Water Framework Directive in place
Traffic Volumes and Modes	Traffic volumes by modal split on a wide variety of routes
	Levels of use of off-highway infrastructure
Waste	Number of compost units sold in the Park area
	Energy use reductions, especially in tourist industry
Visitor Enjoyment of the Park	% who would recommend a friend
	Seasonal breakdown of visitor activity
	Visitor enjoyment or satisfaction

	Number of repeat visits
	Visitor satisfaction levels
	Visitor enjoyment
Cultural Heritage	The past as an indicator of what the Park can achieve in the future
	Take-up of music lessons
	Indicators to assess improvements in new-build siting and design to conserve local distinctiveness
	Measure of impacts on Inventory landscapes
	Proposed indicators monitor neither actions nor impacts
Business Health	Business premises rents as % of national average
	Average annual room rates as % of national average
	Valuations as % of national average
	Number of heritage-based businesses
	Business income by type/sector
	Number of VAT-registered businesses
	Number of new business starts
	Business turnover, profitability and value added
	Wage levels as % of Scottish average
	Farm rents as % of Scottish average
	Business premises rents
	Annual tourist accommodation rates as % of Scottish average
Community Vibrancy	Breakdown of volunteering activity

Changes made following consultation

This section has been re-numbered Section 8 and rationalised to provide a clear distinction between the two monitoring and review strands (the Annual Report on the Priorities for Action and monitoring of the state of the Park) and the framework (the Pressure-State-Impact-Response model) which brings both stands together. The methods and timescales relating to the two monitoring and review strands are also clearly set out.

Given the range of organisations that have expressed an interest in assisting in the selection of indicators and the need to work with a wide range of partners in collating and using the monitoring information, selection of the indicators has been deferred until 2007, once the plan is in place. This work will now be progressed with partners as an early action in implementation, using all comments and suggestions for indicators to develop the monitoring

programme. The former Section 9.3 'Proposed Health Indicators' has therefore been deleted.

5.3 Priorities for Action 2007-2012

General

Comments

Responses commenting on the areas selected for the priorities as a whole generally supported the seven areas selected and believe they provide a reasonable focus. There was concern expressed in some that cultural heritage does not have a higher profile in the priorities, and one (NGO) expressed similar concern about the place of sport and recreation, another (community) about waste management. Several community responses suggested that transport should be more of a priority in the next five years. Some queried why sustainable deer management has been selected as a separate priority from supporting integrated land management.

Some indicated that there was insufficient linkage to the strategic objectives, and inconsistency between the weighting of individual priorities and actions, with a mix of different levels of actions. Several responses indicated confusion about the range of strategic objectives that will be delivered through the priorities, and the place of other work not identified as a priority.

Some responses also suggested that the priorities are too vague in places, and greater clarity on the lead organisations was requested. Several suggested that it is unclear what exactly the action programmes aim to achieve, that they need to be smarter and give a clearer sense of tangible progress on the ground.

Many responses throughout the sections identified further key partners that should be referenced, and some noted inconsistencies in the partners listed in the draft and suggested that the role of these partners should be clearer.

Changes made following consultation

The Priorities for Action have been integrated into the single document that makes up the final National Park Plan at Section 6 and have been re-ordered and reformatted for greater clarity. The most significant change is the inclusion under all the priorities of action of five year outcomes in response to the desire expressed for greater clarity on what these priorities seek to achieve. In addition, a new section under all the priorities for action identifies

the national strategies and objectives towards which the priorities will contribute.

Each Priority for Action now contains a section on why it is a priority, the outcomes for 2012, the contribution these outcomes make to the strategic objectives and to national strategies and an Action Programme 2007-2012. The format of the Action Programme tables has been amended to record the individual actions required to achieve the five year outcomes, while partners have been amended to reflect the consultation comments and discussions with partners.

The subjects of the priorities remain broadly the same, although the headings and content have been amended as set out below. There are now additional actions on cultural heritage – actions on the historic environment have been included under 'Conserving and Enhancing Biodiversity and Landscapes', while actions relating to understanding more about community culture and traditions have been included within the more generic headings. Additional actions on public transport have also been included within 'Providing High Quality Opportunities for Outdoor Access'.

Across all the priorities for action, the lists of partners have been amended following consultation responses and discussions with the relevant partners.

Conserving and Enhancing the Park's Biodiversity and Landscapes

Biodiversity

Comments

There was strong support for the identification of this as a priority. A large number of responses addressed issues relating to biodiversity. Several responses supported reintroduction of certain species and suggested that a review of potential reintroductions and preparatory work should be carried out in the next five years. Others suggested that full reintroductions should take place within this timescale. A number also stated that the focus should extend beyond designated sites and species.

Several suggested that the focus for delivery should extend beyond the Local Biodiversity Action Plan, taking a broader and more strategic approach, and one (individual) suggested that the priority should be to deliver on the commitments already in the Local Biodiversity Action Plan. Another (NGO) suggested that systematic recording and establishment of a biological records centre should be a priority, together with modelling of the potential effects of climate change.

One response (NGO) suggested the plan should give a clearer sense of how public bodies can deliver their responsibilities under the Nature Conservation Act 2004 (biodiversity duty) in the Park.

Several responses made suggestions for individual species action plans to support threatened or rare species. With regard to designated sites, one response (NGO) sought more clarity about what will actually be done to enhance the condition of sites, another (NGO) noted that historic environment designations should be included, and another (land manager) sought consideration of social and economic consequences in determining favourable condition.

Several responses supported the further development of habitat networks, including a focus on forest networks and grazing patterns, partly as a response to climate change. Two (NGO and individual) suggested that woodland cover on moorland should expand, although one (NGO) noted that the interests of visual amenity and ecological functioning units may not always coincide. One (individual) suggested that any new tree planting in the Park should be of native species only. Others (public and NGO) suggested that greater prominence should be given to habitat restoration as a priority.

There was general support for action to protect biodiversity from wildlife crime, but suggestions that a more positive approach could be taken in the plan to dealing with this, with a wider range of partners involved. One (individual) also argued for strict cross-compliance with public funding.

Two responses (public) proposed that geodiversity should feature in the priority action programme, in particular a geodiversity audit, including a review of soils data to provide a baseline.

Changes made following consultation

Biodiversity now appears as one of four sections (Landscape, Historic Environment, Biodiversity and Geodiversity) in the Action Programme for this Priority for Action. The revised format highlights the importance of the constituent elements making up the outstanding natural and cultural heritage of the Cairngorms, with the focus for delivery now broader and more strategic.

Geodiversity is now included in the Action Programme, with actions ranging from a comprehensive Geodiversity Audit and Action Plan to measures to

ensure all management is carried out in ways compatible with conservation and enhancement of geodiversity.

Actions on reintroduction of species do not identify particular species, or set targets for reintroductions within five years, but address the preparation and management issues necessary to consider reintroductions, and note that such proposals will be set in the national context.

The actions have a broader focus than the Local Biodiversity Action Plan, but use this existing work to inform further work, including a strategic approach to research, recording and filling data gaps. Action plans for individual species are included as a headline action, with the particular species being defined by existing strategies including the Local Biodiversity Action Plan and the Scottish Species Framework.

Landscape

Comments

Several responses sought a higher profile for landscape enhancement and wild land, in particular within the actions. A proactive approach to restoring high altitude tracks, removing other detractors from wild land qualities and opportunities to enhance the wildness experience were proposed (public, NGO, individual). Further assessment of landscape qualities and a commitment to raising the profile of landscape to NSA equivalent across the Park was also suggested (public).

One response (NGO) also suggested actions to enhance protection and understanding of the historic landscape.

Changes made following consultation

Individual actions now highlight the need for positive management of natural, cultural and built landscape qualities, including actions to identify, protect and enhance wild land qualities. Actions relating to the Historic Environment have been included to enhance historic landscape protection and understanding, better recognising the interaction between the natural and cultural landscape.

Developing Sustainable Deer Management

Comments

Several responses welcomed the priority and recognition given to deer
management, while a number of others queried the selection of deer
management as a priority. Those querying the rationale suggested that deer
are unfairly seen as a problem and singled out. Some suggested that the
priority should focus on the broader topic of grazing management, in the
wider context of integrated land management as a whole. Those welcoming it
also suggested a broader definition of sustainable deer management to
include the socio-economic aspects as well as natural heritage.

A number of responses (land managers) stated that sustainable deer
management is already taking place, and that the title of this priority
incorrectly suggests that deer management is currently not sustainable.
Several emphasised the existing role of Deer Management Groups in
sustainable deer management.

One response (NGO) suggested a Cairngorms Deer Advisory Group is
unnecessary, and that the Deer Management Groups should provide
sufficient co-ordination, while others supported the creation of an advisory
group, although noting that its role and added value must be clear.

Two responses (public and NGO) requested consideration of non-native deer
species, including sika, and taking action to ensure muntjac do not become
established. One response (land manager) welcomed the desire to improve
venison marketing, and another (land manager) sought greater mention of the
economic value of deer and stalking.

Changes made following consultation

The focus on sustainable deer management as one of the key challenges facing
the Park that can significantly influence a number of strategic objectives has
been retained. However, the title has been changed to 'Supporting Sustainable
Deer Management' to reflect the fact that many partners, including deer
managers, are already engaged in seeking more sustainable management.

The section now includes reference to the need to take account of the
combined grazing impacts of deer, sheep and other grazers, and the need to
address non-native deer species, namely muntjac, fallow and sika. It also sets
out a broader description of sustainability, including explicit reference to
delivering socio-economic as well as natural heritage objectives.

Supporting Integrated Land Management

Comments

The responses supported this area as a priority, although some (land managers) suggested it should give more recognition to the existing good land management practice in the area and the public benefits already being delivered without direct funding.

In particular, responses welcomed the use of grant schemes to assist communication, suggest that the historic environment and riparian issues should feature more strongly and that the agricultural sector should have more prominence in the plan.

With regard to the proposals for support, several responses agreed with the desire to simplify and join up public support. Several (land managers) noted that the wording should refer to the public benefits that land managers could deliver, rather than should deliver, and that the benefits should be agreed by all concerned. Two (land managers) also highlighted the need to include training provision within support. One (individual) queried whether the Forest and Woodland Framework will be linked to incentives.

There was concern expressed in some responses that the proposals for whole-unit plans could be straightforward or very intrusive and time-consuming, depending on how they are implemented, ie that it will be a useful approach if they simplify, rather than increase, the bureaucracy involved.

Two responses (public) noted that support for food marketing and processing should come through Scottish Food and Drink. One (public) suggested that action to support land managers increase revenues from tourism should be included, while others suggested that potential for increased diversification into tourism may be limited.

Changes made following consultation

This Priority for Action has been re-named 'Integrating Public Support for Land Management' to more clearly reflect the intention and content. It focuses on better integration of public support to deliver a diverse, viable and productive land management sector.

The Action Programme now refers to the public benefits which the public might ask land managers to provide through public sector support in the form of grant aid, training and advice. It also provides for an inclusive approach to determining what those benefits might be.

Reference to the whole-unit approach to management planning and support remains, but the concerns about how this is implemented have been noted. Scottish Food and Drink have been included as a partner in delivering support for food marketing and processing.

Providing High Quality Opportunities for Outdoor Access

Comments

Responses referring to this section generally welcomed its identification as a priority, although some suggested that greater links should be made with the priority 'Making Tourism and Businesses Sustainable'. A number stated that they would like to see the National Park as an exemplar of best practice in outdoor access. One (public) would like to see a more ambitious programme of activity in the next five years, but recognised a need to concentrate on delivering new access duties in the short-term.

Several responses referred to issues of responsible access. Three (NGO and individual) asked whether the plan should address wild camping and mountain bothies, with particular mention of Derry Lodge. There was strong support for actions to encourage responsible access enjoyment and management, and some suggestions for rewording to improve clarity, particularly with regard to land management support. Education and the role of interpretation were noted as important tools to develop understanding.

Two responses (public) would welcome more reference to ranger services in the programme, and clarity on the way forward for these services in the Park. One (NGO) suggested that the wide number of existing ranger services does not represent the best opportunity to promote cohesive management.

One response (public) suggested more could be made of broader recreational opportunities in the priority, and another (NGO) suggested these should be more clearly linked to the special qualities of the Park.

A number of responses commented on actions for route provision and promotion. There was support for the range of routes identified, including functional as well as recreational routes. There was concern among several respondents, including communities, that there may be a lack of maintenance funds for routes, and suggestions that the plan might identify sources of funding. One (land manager) was concerned that a Park-wide trust for access may lack local focus and become too bureaucratic.

One (land manager) response suggested that actions should refer in more detail to establishing a path network rather than simply producing a Core Paths Plan, while others suggested montane routes should be included in the Core Paths Plan, together with comment on other potential long-distance routes and car parking facilities.

A number of responses commented on transport provision for access, with several noting inadequate bus services and a lack of timetable information. The actions to address transport issues were welcomed, with responses suggesting communities should be linked by off-road routes, that there should be a strategy for car parking with clear guidelines for charges, and improvements for linking transport routes and timings with access opportunities. Two responses suggested further provision of cycle carriage and an extension of this provision to other equipment people use to enjoy the Park (eg skis).

Several noted the need for more information about trials such as the Heather Hopper and sufficient time to evaluate their success. Some community responses suggested the plan is not ambitious enough in tackling transport issues.

Changes made following consultation

Through identifying the five year outcomes, the plan seeks to give a clearer sense of the added value over and above the national policy context. The Action Programme for this Priority for Action now consists of five sections (Improving path condition and quality, Promoting responsible outdoor access and management, Promoting visitor information about outdoor access opportunities, Promoting sustainable transport for enjoyment of the National Park and Promoting healthy lifestyles). The actions under each of these sections are more clearly focused on enabling residents and visitors of all ages, abilities and interests to get outside and enjoy the countryside, thereby promoting healthy lifestyles, while at the same time highlighting the need to develop an effective understanding of responsible access and access management.

Additional actions on improving public transport provision have been included, specifically making better links between public transport and outdoor access opportunities and extending provision on public transport for other recreation equipment such as skis.

The detailed issues of mountain bothies and wild camping are not addressed in the National Park Plan, but are addressed in the Outdoor Access Strategy,

which sets out in more detail how the strategic objectives of the plan will be delivered. The Outdoor Access Strategy also addresses the need for more co-ordination in planning for outdoor recreation.

Comments about the concerns over future maintenance of access routes have been noted, but cannot be addressed in the plan.

Making Housing Affordable and Sustainable

Comments

There was strong support, particularly from community respondents, for identifying this as a priority. Several noted that there are various definitions of affordable housing, that the priority should be to provide housing for people living and working in the area and noted that a range of housing provision is needed.

There was support for greater co-ordination, but several (public) sought greater clarity on respective roles and suggested that greater emphasis should be placed on the role of local authorities. Some also suggested that clearer links to the Local Plan are needed. The importance of creating mixed and balanced communities was stressed. Community meetings also stressed the importance of good design for all housing, in particular ensuring that affordable houses are of good quality and design.

One (public) suggested that tackling the quality of existing housing stock should also be a priority and supported other actions to increase supply, although noting that the impact of Local Lettings Initiatives on creating sustainable communities is unclear.

Two responses (land managers) emphasised a need to make land available, identifying land price as a barrier to delivering affordable housing.

A significant number of responses made reference to the Cairngorms National Park Authority's Preferred Strategic Direction for Affordable Housing, which although not forming part of the Draft National Park Plan was published during the consultation period. Some expressed confusion about the relationship between these proposals and the National Park Plan and the Local Plan. Many responses expressed concern at the potential impacts of residency criteria on the housing market and the broader economy and the practicalities of enforcing change of use provisions relating to second homes. Most responses supported the objectives of the Draft Plan to increase accessibility to affordable housing, but were concerned at these particular

proposed measures. These responses will inform the Cairngorms National Park Authority Board's further discussion on residency criteria and the developing Local Plan.

Changes made following consultation

This Priority for Action has been re-named 'Making Housing More Affordable and Sustainable'. The Action Programme now consists of four sections (Increasing supply and accessibility, Effective co-operation and co-ordination, Improving quality and sustainability and Effective land and infrastructure). The emphasis is on creating a range of housing opportunities to meet the needs of different people.

An action to improve the quality of existing housing stock has been added and the reference to a local lettings initiative has been amended to a broader reference to potential mechanisms. Instead of reference solely to residency criteria, a full range of low cost home ownership mechanisms to increase the level of affordable housing that remains affordable in the long-term are included.

Comments on the 'Preferred Strategic Direction for Affordable Housing' have also been used to inform ongoing work on the Local Plan.

Making Tourism and Businesses Sustainable

Comments

There was general support for this priority, with a number of suggestions for greater integration with the wider regional agenda, in particular to develop the economy and tourism sector. Some suggested giving a broader definition of the scope of reference to business and tourism, including home-based business, social enterprise, country sports and other rural businesses. One (business) felt the section is too much about monitoring and not enough about proactive development of tourism and business. The Economic and Social Development Forum queried the balance between tourism and other economic sectors in the plan, and sought clarification about the scope of this work.

With regard to tourism and visitor information, one response (business) suggested the plan is vague about promotion of the Park and the potential use of Tourist Information Centres for information provision. It also noted the need for careful co-ordination of website information to avoid duplication and conflicting messages. Another (individual) noted that there is no mention

of interpretation as a tool in this section. Several (public) indicated the need to consider the role of the Park in the wider area and provide information at key entry points such as airports and cities.

A significant number of responses focused on support for the tourism and business sector. They included suggestions to identify the opportunities that result from being a National Park, a clear inward investment strategy and a more outward-looking approach to developing the economy beyond tourism.

While some responses expressed concern at a reliance on tourism, there was a general view that support should concentrate on developing the quality of tourism and businesses. There appeared to be a difference of view in different areas of the Park about the potential for diversification of land-based businesses into tourism, with potential noted in the east area, but not the south. One response (business) suggested that publicly-owned visitor facilities can inhibit diversification of private businesses. However, there was a common view that the focus should be on striving for excellence, including benchmarking and training.

One response (public) highlighted the social contribution of seasonal jobs and international workers and the importance of the voluntary sector and in-kind support, suggesting that the plan should address these issues and recognise where these may fulfil local objectives.

Other responses suggested priority attention is given to supporting local craft producers, vernacular design, forest-related industries, farm produce branding, training opportunities, pro-active marketing campaigns, pump priming for sustainable tourism enterprises, and reducing red-tape. Schools groups noted a particular desire that all businesses should become more environmentally aware in their activities.

A large number of responses made suggestions for additional partners that wish to be involved in taking actions forward.

Changes made following consultation

This Priority for Action has been re-named 'Making Tourism and Business More Sustainable' to reflect the fact that it seeks to address the business sector as a whole. The Action Programme now contains three sections (Making tourism everyone's business, Supporting business excellence and quality and Promoting sustainable enjoyment of the Park).

More emphasis has been placed on ensuring that an increasing proportion of economic activity will be based on the special qualities of the Park and the fact that tourism is 'everyone's business'. The need to encourage business excellence and quality has been more strongly stated, as has the need to develop innovative schemes to assist land management units develop their economic and environmental sustainability. Additional partners have been added as suggested by respondents.

Developing Awareness and Understanding of the Park

Comments

There was support for promotion and raising awareness of the Park as a priority, but also a view that the Action Programme should be more focused and clearer about what it seeks to achieve. One response (individual) highlighted the lack of coherent identity at the moment. In particular, there was support for developing the brand identity of the Park, but in a way that complements the wider regional and Scottish brands, using Area Tourism Partnerships, Destination Management Organisations and others in a tourism context. A number of responses indicated that this programme should include some international dimension within the first five years.

A number of responses and meetings highlighted the importance of communities in developing awareness and understanding, including gateway communities outside the Park, and stressed the resource that exists in communities to help others develop understanding and awareness of the area. One (community) noted it is important to work with all community groups, not just Community Councils, and another highlighted the resource implications for communities in taking forward such projects. The view that this should refer more generally to community engagement is expressed by community responses.

Responses also noted a potential tension between the identity of individual communities and the developing identity of the National Park, and between communities of place and interest. Some highlighted the potential of targeting the young in establishing awareness and understanding for the future and suggested this should be a focus for resources.

Two responses (public and individual) suggested that Gaelic should be integral to educational and awareness resources, as well as signage around the area. Others suggested that the built and historic environment make a significant contribution to the Park's identity and should form part of a

programme to increase understanding. Several also made a point that culture must also be forward-looking and include the arts sectors, as well as heritage.

There was support for actions to encourage learning about the Park and its special qualities, and endorsement in two responses (public and NGO) of the aspiration for every child to have access to the John Muir Award experience, as well as public sector workers, but caution about the practicalities of delivering this.

One response (public) suggested linking an outreach programme into the Active Schools Programme to join up actions through physical activity. Two responses (individual) suggested that an assessment of existing interpretation should be carried out, and an Interpretive Plan prepared.

A number of responses supported the proposals to raise awareness and understanding about the special qualities in particular, and the need to increase knowledge of these resources. Responses noted there are several mechanisms to assist this, beyond the National Nature Reserves and Ranger Services noted in the draft. Other responses also recommended more description of the qualities in the plan and a programme to increase knowledge and understanding of them in the next two to three years. In particular, three (NGOs, land manager, community) responses suggested a greater focus on the built and historic environment is needed.

Changes made following consultation

This Priority for Action has been renamed 'Raising Awareness and Understanding of the Park' and the emphasis placed on promoting a strong sense of place. It now contains six sections (Signage, Key places for information transfer and interpretation, People and the Park, Print and web resources, Marketing the National Park and Developing our collective understanding of the special qualities), with the focus on more residents, more visitors and more people across Scotland becoming more aware of the National Park and appreciating its special qualities.

5.4 Strategic Environmental Assessment

Comments

Relatively few comments on the Strategic Environmental Assessment (SEA) were made. The three Consultation Authorities indicated that the assessment meets good practice and gave some detailed comments to inform any update. In particular, attention was drawn to potential negative environmental effects

from some objectives in the plan, with suggestions for rewording to ensure these effects are minimised. Explicit reference to likely effects on Natura sites was also requested.

Some responses, particularly from communities, ask why socio-economic assessment is not included in the Strategic Environmental Assessment. Beyond the public and NGO sectors the concept of Strategic Environmental Assessment is not known.

Changes made following consultation

The SEA Statement published to accompany the completed National Park Plan records how the Environmental Report and the consultation responses to it have been used in completing the National Park Plan. The SEA Statement is available separately on CD or can be downloaded from www.cairngorms.co.uk.

6. Feedback to Stakeholders

A letter was sent to all respondents in July setting out the process for completion of the plan and drawing attention to the interim consultation report issued in September 2006. A further letter will confirm that the completed plan has been approved by the National Park Authority Board and submitted to Ministers for approval.

The completed text of the National Park Plan (subject to Ministerial approval) is available on the Cairngorms National Park Authority website (www.cairngorms.co.uk), accompanied by this Consultation Report and the SEA Statement.

Once approved by Ministers, copies of the completed plan will be published and circulated to interested parties. A summary of the plan will also be published and circulated to all households and businesses in the National Park.

7. Using the Responses to Complete the Plan

This document summarises the responses, both written and from meetings. In addition to this summary, all the comments submitted in responses and made at meetings were collated according to sections of the draft plan. These have been used by the National Park Authority, with other partners where

relevant, to identify what changes should be made to the draft plan and how the plan should be finalised.

Responses are available from the National Park Authority on request, except where respondents have requested confidentiality.

The milestones in the process to complete the plan following the public consultation were:

- 8th September 2006 – Publication of the Interim Consultation Report (summary of responses);
- 3rd November 2006 – Approval by the National Park Authority Board of the significant areas of change to the plan;
- 1st December 2006 – Plan submitted to the National Park Authority Board for approval and agreement to submit to Ministers.

On approval of the National Park Plan by Ministers, the consultation report will be published in electronic format to accompany the plan.

For further information or queries please contact:

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ANNEX I – List of Respondents to Public Consultation

Public Bodies

Aberdeenshire Council
Angus Council
Bòrd na Gàidhlig
British Geological Survey
Communities Scotland
Deer Commission for Scotland
Forestry Commission Scotland
Forest Enterprise Scotland
Highlands and Islands Enterprise
Historic Scotland
HITRANS
Scottish Enterprise Grampian
Scottish Enterprise Tayside
Scottish Environment Protection Agency
Scottish Natural Heritage
Scottish Water
SportScotland
SUSTRANS
The Crown Estate
The Highland Council
VisitScotland

Non-Governmental Organisations/National Governing Bodies

Cairngorms Campaign
Canoe Scotland
Comunn na Gàidhlig
Council for Scottish Archaeology
John Muir Trust
National Trust for Scotland
North East Mountain Trust
Ramblers Scotland
Royal Society for the Protection of Birds (RSPB) Scotland
Scottish Canoe Association
Scottish Council for National Parks
The Cairngorm Club
Woodland Trust for Scotland

Communities

Ballater and Crathie Community Council
Community Recycling Network for Scotland
Finzean Community Council

Kincraig and Vicinity Community Council
Marr Area Partnership
Rothiemurchus and Glenmore Community Association
The Moray Society

Businesses/Land Managers/Professional Organisations

Aberdeen City and Shire Economic Forum
Alvie and Dalraddy Estates
An Camus Mor Team
Association of Deer Management Groups
Aviemore and the Cairngorms Destination Management Organisation
British Association for Shooting and Conservation
British Deer Society
Cairngorms Chamber of Commerce
Confederation of Forest Industries
CTC-RTR Aberdeenshire
East Grampian Deer Management Group
Farming and Wildlife Advisory Group (FWAG) Scotland
Forests, Trees and Livelihoods
Forestry and Timber Association
Jacobs Babtie
Invercauld Estate
National Framers Union of Scotland
Rothiemurchus Estate
Royal Institution of Chartered Surveyors (RICS) Scotland
Scottish Raptor Study Group
Scottish Rural Property and Business Association
UHI Centre for Interpretation

Individuals
A total of 61 individuals also submitted responses.

ANNEX II – List of Consultation Meetings

Date	Meeting/Group	Location	Topics for discussion	Number Attending
12/4/06	Association of Cairngorms Community Councils	The Lecht	Overview and discussion on community consultation methods	12
18/4/06	Learning and Inclusion Stakeholders	Nethy Bridge	Priorities for Action – role of learning and inclusion	25
19/4/06	Learning and Inclusion Stakeholders	Strathdon	Priorities for Action – role of learning and inclusion	15
20/4/06	Economic Development Officers Group	Ballater	Overview and discussion of Priorities for Action: -Housing -Tourism and businesses	8
25/4/06	Cairngorms Deer Advisory Group	Dalwhinnie	Introduction to Draft Plan	11
25/4/06	Community Councils briefing	Aviemore	Introduction to Draft Plan and how to consult communities	25
26/4/06	Community Councils briefing	Ballater	Introduction to Draft Plan and how to consult communities	7
2/5/06	Built Environment Forum Scotland	Edinburgh	Built heritage, landscape and sustainable design	12
9/5/06	Integrated Land Management Advisory Forum	Strathdon	Priorities for Action: -Biodiversity and landscapes -Sustainable deer management -Integrated land management	13
11/5/06	Cairngorms Recycling Forum	Ballater	Waste management	13
15/5/06	Braemar Community Council	Braemar	Overview and open discussion	8
18/5/06	Visitor Services, Information and Tourism Advisory Forum	Strathdon	Priorities for Action: -Making tourism and businesses sustainable -Outdoor access	16
30/5/06	Cultural Heritage Stakeholders Group	The Lecht	Cultural heritage	31
31/5/06	Dalwhinnie Community Council	Dalwhinnie	Overview and open discussion	6
1/6/06	Nethy Bridge Community Council	Nethy Bridge	Overview and open discussion	20
6/6/06	Open Community Meeting	Grantown-on-Spey	Overview and open discussion	6
7/6/06	Cairngorms Chamber of Commerce	Dalwhinnie	Overview and Priorities for Action	32

8/6/06	Cairngorm, Rothiemurchus and Glenmore Group (CRAGG)	Glenmore	Overview and discussion on implications for CRAGG	12
9/6/06	Economic and Social Development Advisory Forum	Tomintoul	Priorities for Action: -Making tourism and businesses sustainable -Making housing affordable and sustainable -Developing awareness and understanding	22
11/6/06	Ballater Community Open Day	Ballater	Open drop-in session	100
12/6/06	Visitor Services and Interpretation stakeholders	Tomintoul	Priorities for Action: -Developing awareness and understanding	16
13/6/06	Open Community Meeting	Braemar	Overview and open discussion	15
14/6/06	Cairngorms Housing Group	The Lecht	Preferred strategic direction for housing	18
15/6/06	Association of Cairngorms Community Councils	The Lecht	Community roles in delivering priorities for action and ongoing engagement methods	24
20/6/06	Schools Forum	Ballater	Overview and discussion on Priorities for Action	46
21/6/06	Scottish Environment Link	Perth	Overview and Priorities for Action	6
21/6/06	Schools Forum	Nethy Bridge	Overview and discussion on Priorities for Action	38
21/6/06	Open Community Meeting	Kingussie	Overview and open discussion	6
24/6/06	Youth Forum	The Lecht	Overview and discussion on Priorities for Action	4
3/7/06	Cairngorms Deer Advisory Group	Tomintoul	Priority for Action – Developing sustainable deer management	13
5/7/06	Community Meeting	Memus	Overview and open discussion	8
				Total: 588