Cairngorms National Park Plan

Interim Consultation Report

Summary of Responses to the

Draft National Park Plan

September 2006

Cairngorms National Park Authority

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Contents

1. Introduction

This is an interim 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.

It is prepared in order to inform the National Park Authority and its partners in work necessary to complete the National Park Plan, and to provide a publicly available summary of consultation responses.

The interim report does not detail what actions may be taken to address the issues arising. This information will be added as the National Park Plan is completed in collaboration with partners and will be published with the finalised National Park Plan as a full report of the consultation process.

2. Context

The public consultation was a major stage in the process to develop the Cairngorms National Park Plan. However, it is only one part of continuing discussions with a wide range of stakeholders. In order to reach the stage of the draft, discussions were held with over 50 organisations and the draft itself was the product of this ongoing consultation. It was also informed by questionnaires and meetings held to discuss the Local Plan during 2005 and 2006. These discussions are now continuing, informed by responses received.

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 identifies 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 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 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 level, 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 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 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 is a generally good range of respondents in different sectors, and in particular the proportion of individuals responding appears relatively high. The most challenging sector to engage in consultation appears to be communities. Possible reasons include the breadth and strategic level of the plan, the time implications of engagement in the process and responding, and the wider time demands on this sector. Although only seven 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.

The attendance at the open community consultation meetings was generally low. Although these were suggested by 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 sectors of stakeholders, the National Park Authority sought advice from representative bodies on the best means of consultation. However, there remains 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 is high. While there are many and sometimes divergent views expressed, there is a high level of constructive comment and an explicit wish to be involved and contribute positively in most responses.

5. Summary of Responses

This section sets out a summary of the views and comments expressed on each section of the Draft National Park Plan. It does not list every comment made, or include all suggestions for redrafting of text, but it summarises the range of views expressed and the issues raised. Over and above the summary provided here, a significant number of responses also make reference to additional policy context and partners to be considered on specific subjects.

The summary includes views expressed during the consultation meetings as well as in written responses.

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 given at Annex I.

5.1 General

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

Common to many responses is a suggestion the plan should be more outward-looking, addressing the national role and context of National Parks more explicitly, although a small number suggest that national issues are perhaps too prominent in the draft. There is 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 is support expressed in several responses for retaining a relatively concise document and for continuing to simplify and refine the structure. While some indicate that the split into two documents with different time horizons is useful, there is a general sense in

responses that this hinders understanding of the whole. Several responses state that the logic running between sections is not clear enough and that the structure and presentation of analysis could be clearer.

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

5.2 Looking to 2030

Special Qualities (Section 2)

There is 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 are particular suggestions to strengthen the reference to the special range of recreation opportunities and associated culture of recreation, as well as more explicit recognition of the wild land qualities and land management.

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

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

Managing the Park in a Changing Environment (Section 3)

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

There is general support for the principle of an integrated approach in progressing the four aims of the Park, but varied views on practical implementation. Some are concerned that the Plan suggests conflict is inevitable, and seek a more explicit statement that the four aims of the Park should be achieved collectively. There is 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 is some support for a clear statement about the importance of the natural and cultural resources and the first aim.

Some suggest that spatial zoning is a pre-requisite for good management, and reconciliation of potentially conflicting objectives. Others support 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.

Guiding Principles

General
Several respondents note the desirability of the principles, but question how they may be put into practice. Some suggest that rather then being passive principles, the Plan should show how they can be enacted. There is 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 are 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 is 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, is read to imply that people outside the Park are not relevant.

Social Justice
One response (NGO) commends recognition of the need for access provision to reflect social justice. Another (individual) suggests that it is more realistic to refer to the maximum possible access. One (land manager) disagrees 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 comment on this principle. One (public) suggests 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) stresses 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 suggests 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 impacts, particularly human induced, and shaping positive change. Two responses (land managers) suggest the plan should recognise that

change is very difficult to achieve and requires a vibrant business sector unfettered by unnecessary barriers.

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

Vision (Section 4)

General
There is general support for the vision, and while some responses endorse it fully, several suggest that a stronger and more ambitious vision needs to be articulated. Some suggest 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
There is general support for the vision to be an exemplar of integrated management. There are concerns 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) suggest the Park should be the "wild Park", one suggesting a non-intervention approach, the other large-scale restoration of native forest, while others stress the importance of maintaining a working landscape. There are also suggestions that habitat restoration, particularly in upland areas, should form part of the vision.

Living and Working
There is concern expressed by some (public and individual) that stating 'all people will have access to housing and services that meets their needs' is unachievable. One response (individual) suggests economic activity is at odds with conservation, but another (NGO) suggests 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 suggest that the vision should be more outward-looking and not focus solely on the economy within the Park boundary. Responses also suggest that the importance of local communities should be stated, and that a vibrant, diversified economy should be part of the vision. One suggests explicit reference to the role of communities and businesses in leading enhancement of an IUCN Category V protected area.

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

Conserving, Enhancing and Managing the Park (Section 5)

Landscape (Section 5.2.1)

There is a general support for the landscape objectives, although some suggest 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) note a need to consider socio-economic needs alongside landscape. There is 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 express disappointment that there is not greater integration of natural and cultural landscape matters in the plan.

Nature Conservation (Section 5.2.2)

There is a general support among the responses for the objectives, and the importance of biodiversity.

Responses suggest a clearer expression of how the biodiversity duty on public bodies should be implemented in the Park would be useful. Several responses welcome the approach to habitat networks, but note 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 emphasise the need to look beyond designated sites and take a strategic approach, and suggest a stronger emphasis on habitat restoration, particularly upland and woodland habitats.

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

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

Soils (Section 5.3.1)

One response (land managers) recommends the plan should acknowledge existing soil conservation rules within the Good Agricultural and Environmental Condition obligation. Another (land manager) notes 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 look 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) express 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.

Water (Section 5.3.2)

There is 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) notes the need to integrate this consideration with business sustainability and cost-effectiveness.

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

There are 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 include the potential for woodlands to play a key part in catchment and flood management and the issue of erosion of riverbanks by grazing.

Air (Section 5.3.3)

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

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

Land Management (Section 5.4)

There is broad support for the objectives for land management as a whole, particularly for integration. A number of responses identify the changing economic and policy context and suggest 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 is 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 are given to improve marketing advantage. However, one response notes that some produce will always have to be sourced outside the Park.

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

Some responses note 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 suggests the main constraint is agricultural holdings' legislation.

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

Farming and Crofting (Section 5.4.1)

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

One response notes 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 draws attention to the difficulty of delivering support through non-farming activities in remote areas. It suggests 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.

Forestry (Section 5.4.2)

Many responses endorse the importance of the forest resource, and particularly the native woodland character. In terms of forest cover, there are a number of responses which aspire to native woodland expansion and suggest targets should be set, with support for the

further development of forest habitat networks. One (NGO) also suggests that the ratio of native to non-native trees should increase, and emphasises the importance of planted ancient woodland sites for restoration. One response (land manager) notes that much existing stock is from imported seed, and that planted stock should not necessarily have to be of local origin.

There are, however, some responses expressing caution about expansion of forest cover. One (individual) suggests that there may be little room for expansion in some areas, another that expansion may reduce the value of some landscape views, and another warns of the increased fire risk and deer management costs. There is also concern that native woodland expansion must be balanced with productive forestry. There is 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 is a significant number of responses that argue for greater prominence to be given to recreation and tourism and productive forestry. Several responses note that multiple objectives are desirable, but not always appropriate in every case. Suggestions include 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 are 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.

Moorland Management (Section 5.4.3)

There is 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) suggests the plan should be clear that management for shooting purposes should only be encouraged if there are negligible environmental disadvantages. One response also hopes 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 is highlighted, and there is a suggestion for research into possible moorland management options.

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

Deer Management (Section 5.4.4)

There is a common view in responses of the importance of deer management in the Cairngorms. Responses also note the current arrangements for co-ordination through Deer

Management Groups. One response (land managers) reports being "a little encouraged at the relatively positive approach to developing the objectives" and suggests more explicit recognition of the socio-economic value of deer would be helpful. Other (individual) responses believe that red deer numbers need to be substantially reduced in many areas. One response highlights the impact on cultural landscapes and indicated this should be considered in a deer plan.

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

There is caution about best practice guidance, which is noted as incomplete and not universally agreed. The same response also suggests 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) argues for a statement of presumption against deer fencing, while another (land manager) argues that fencing is a legitimate and valuable management tool. Several suggest the plan should endorse the joint agency statement on deer fencing.

Several responses note the wording which apparently states that sika deer are a valuable part of the natural heritage and suggest that the plan should address ways to reduce sika numbers and minimise the opportunity for muntjac deer to become established.

Fisheries Management (Section 5.4.5)

Two responses (land managers) indicate 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) highlights the potential adverse impacts of 'put and take' fisheries on native fish stocks. Two responses (community and NGO) highlight the importance of migratory fish and the need to enhance their environment, and one (public) notes a need to address conflict between angling and other sports in some places.

Built and Historic Environment (Section 5.5.1)

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

While most agree with the objectives, a number of responses suggest more detail is needed. Particular issues raised include 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 suggests a scheme to provide financial assistance to upgrade and adapt historic buildings for new uses.

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

Culture and Traditions (Section 5.5.2)

There is a general support for the objectives and the importance of local cultures, particularly oral history and local archives. There is 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 is also noted in some responses with one suggesting a use of Doric on signage in the east of the Park.

Communities Living and Working in the Park (Section 6)

Economy and Employment (Section 6.2)

There is a 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 suggest 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) feel 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) suggests the tone implies development and growth is automatically in conflict with conservation. One (public) suggests greater emphasis be placed on improving the green business practice of existing businesses, which will require support.

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

There is 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 is identified by two responses (land managers). One (land manager) suggests a

better balance of tourism and productive sector activities is needed and that private investment is currently discouraged by the public sector.

Education and Training (Section 6.3)

Comments on this section highlight the need to view adult learning in a broader context, a need to acknowledge the role of the University of the Highlands and Islands and a 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 express a desire to see greater diversity of training and labour opportunities, particularly an increase in apprenticeships and opportunities beyond the tourism sector. They also feel there is a relatively limited range of subject options during school education that limits their future options.

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

Sustainable Tourism (Section 6.4)

There is 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 is 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 suggest a greater emphasis on "tourism is everybody's business". Some respondents request a clearer definition of 'sustainable' tourism. One asks why the word 'sustainable' has been explicitly included in this heading but not others and suggests the emphasis is on sustaining the tourism industry rather than sustaining the environment. It also notes that aspects of energy use are not encompassed. Two (NGO and land manager) express concerns about the environmental impacts of too many visitors, and one notes that tourism is a major cause of the lack of affordable housing, but that this is not mentioned.

One (business) feels 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 suggests more reference be made to food and drink and the history of tourism in the area.

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

Some responses also indicate 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 is noted in several responses.

Transport and Communications (Section 6.5)

A number of responses feel 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) suggest that the plan should give explicit support for dualling of the A9 and rail improvements, and suggest greater integration and reference to regional transport strategies.

Further reference to community transport is 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 is 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, is suggested.

Housing (Section 6.6)

Many responses support the focus on affordable housing, although some suggest that the objectives should also recognise the wider housing market. Some responses perceive an emphasis on constraint rather then enabling. There is, however, wide support expressed for the aspiration to address affordable housing issues. A number of responses suggest alterations to the detail of these objectives. One has concerns about the use of the term 'perpetuity', suggesting that 'long-term' would be more realistic. There is 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 highlight the link between income levels and house prices, and the need to take an holistic approach. Other suggestions to address affordable housing include 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) are 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 suggest release of more land for housing, including land allocated specifically to affordable housing, is a key objective.

A number of responses refer to design and infrastructure objectives. There is 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 suggest strict biodiversity conditions on developments, use of conservation planning gain, use of

woodfuel energy, use of lime mortars and masonry on traditional buildings and a recognition that innovative design should be encouraged.

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

Renewable Energy (Section 6.7)

A number of responses suggest the plan would be strengthened by adopting targets for renewable energy use and generation. One (individual) suggests 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 suggest the scope of the section should be broadened to include 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 is agreement with the proposed support of small and medium-scale generation schemes, one response (public) feels there is no reasoned justification for a presumption against large-scale commercial generation. One response (individual) indicates that it would expect to see an explicit statement on pylons and wind farms.

Waste Management (Section 6.8)

There is 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 suggests broadening the text to include all waste materials including energy, business waste, and air emissions. A general point made is that the section could be more specific so that progress can be monitored.

A number express concern that, while desirable, it is unclear how the objectives could be achieved. They note 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 suggest greater emphasis on waste reduction, 'zero waste' principles and the need for greater awareness. One (public) highlights a need for strategic minerals data and policy to manage landfill sites. Two responses (land managers) urge a zero tolerance approach to litter in the Park. A need for education and awareness-raising is also noted in responses.

Communities place a high priority on improving waste management facilities.

Strengthening Communities (Section 6.9)

There is general support for the vision of thriving communities, but varied responses to the objectives. One (community) response feels inadequate coverage is given to community issues, particularly the economic and social viability of settlements. Another (land manager)

is concerned at the complexities of involving communities in decision-making processes and about the representative nature of Community Councils. Some suggest that more could be made of community planning as a means of integrating community engagement in an area, and one (community) notes the need to find ways to support communities with the workload of increased engagement.

Three responses (public and individual) note 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, 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) suggests 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 notes that publicly-funded, community- run businesses can distort the market place.

Understanding and Enjoying the Park (Section 7)

Outdoor Access and Recreation (Section 7.2)

There is 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 suggest this section could be broader and more ambitious in its scope.

In particular, one response (public) strongly recommends a more ambitious approach that explicitly seeks to increase further the already high quality recreational experiences – there is 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 suggests 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 suggest greater cross-referencing and context with tourism and land management.

Another response (public) recommends the plan should take a more positive approach to promoting enjoyment of recreation. It suggests that the current 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 is suggested that the current wording is more about managing the impacts of recreation rather than promoting its enjoyment.

There is a common view that the concept of mutual respect and responsible access is key to both access managers and those enjoying access, and one (land managers) suggests an

enquiry service to assist understanding. There is 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 access provision should not compromise the special qualities. Another response (public) also suggests 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 express frustration at barriers to participation including affordability and transport.

Visitor Services (Section 7.3)

There is 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 is suggested by one response (public) to explicitly support tourism development to promote opportunity and encourage investment and employment.

One response (NGO) feels 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 – not recognising the range of people that feel some connection to the area and are regular visitors.

Learning and Understanding (Section 7.4)

The responses recognise the importance of learning to the long-term success of the Park, and several suggest it should be given more emphasis and be better joined-up throughout the plan. Several seek a broader focus on learning, emphasising the international context, and others seek 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) seeks more emphasis in particular on responsible behaviour in the countryside and the interpretation of natural and historical features and land management.

Implementation (Section 8)

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

A number of comments support the partnership approach and note that this is vital for delivery. Several emphasise the need to engage effectively with the private sector and communities, suggesting that the plan seems focused largely on the public sector. Some have concern that implementation relies largely on voluntary partnerships, and that the plan does not address all the constraints and practicalities. In some responses, clarity is 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 highlight concerns that the plan does not carry with it resources for implementation, and therefore there is a danger of not delivering. One (NGO) suggests that other areas of lower priority could be noted for delivery if resources allow. Several note the role of the Local Plan in delivering many objectives and stress the need for good integration between the two plans. Some also seek more clarity on how aspects that are not in the priorities for action should be pursued.

Monitoring and Review (Section 9)

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

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

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

Theme	Suggestions for indicators
Business	rents; average annual room rates; valuations; wage levels; farm rents; all in relation to Scottish average.
Culture	take-up of music lessons.
Housing	number of households in need in housing needs survey/local housing strategy; investment in new affordable housing through Communities Scotland instead of private investment; numbers on housing lists; rent levels; sustainability index; ratio of waiting list applicants to number of lets; numbers in poor energy rated housing, number of houses below Scottish Housing Quality Standard; income/rent ratio, house price trends; number of waiting list applicants housed by private landlords who have accessed grants or by low-cost housing sale.
Land Management	farm rent levels; area under long-term management plans, including Forest Plans; use of woodfuel.
Landscape	visitor appreciation; impacts on Designed Landscapes.
Traffic	volumes by modal split on wide variety of routes; levels of use of off-highway infrastructure.

Visitor Services	who would recommend a friend; enjoyment.
Waste	energy use reductions; number of green business opportunities taken up; zero waste target.

5.3 Priorities for Action 2007-2012

General

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

Some indicate that there is 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 indicate 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 suggest that the priorities are too vague in places, and greater clarity on the lead organisations is requested. Several suggest 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 identify further key partners that should be referenced, and some note inconsistencies in the partners listed in the draft, and a suggestion that the role of these partners should be clearer.

Conserving and Enhancing the Park's Biodiversity and Landscapes

Biodiversity
There is strong support for the identification of this as a priority. A large number of responses address issues relating to biodiversity. Several responses support re-introduction of certain species and suggest that a review of potential re-introductions and preparatory work should be carried out in the next five years. Others suggest that full re-introductions should take place within this timescale. A number also state that the focus should extend beyond designated sites and species.

Several suggest that the focus for delivery should extend beyond the Local Biodiversity Action Plan, taking a broader and more strategic approach, and one (individual) suggests that the priority should be to deliver on the commitments already in the Local Biodiversity

Action Plan. Another (NGO) suggests that systematic recording and establishment of a biological records centre should be a priority, and modelling the potential effects of climate change.

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

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

There is 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 argues for strict cross-compliance with public funding.

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

Landscape
Several responses seek 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 are proposed (public, NGO, individual). Further assessment of landscape qualities and a commitment to raising the profile of landscape to NSA equivalent across the Park is also suggested (public).

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

Developing Sustainable Deer Management

Several responses welcome the priority and recognition given to deer management, while a number of others query the selection of deer management as a priority. Those querying the rationale suggest that deer are unfairly seen as a problem and singled out. Some suggest 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 suggest a broader definition of sustainable deer management to include the socio-economic aspects as well as natural heritage.

A number of responses (land managers) state 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 emphasise the existing role of Deer Management Groups in sustainable deer management.

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

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

Supporting Integrated Land Management

The responses support this area as a priority, although some (land managers) suggest 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 welcome 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 agree with the desire to simplify and join up public support. Several (land managers) note 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 highlight the need to include training provision within support. One (individual) queries whether the Forest and Woodland Framework will be linked to incentives.

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

Providing High Quality Opportunities for Outdoor Access

Responses referring to this section generally welcome its identification as a priority, although some suggest that greater links should be made with the priority 'Making Tourism and Businesses Sustainable'. A number state 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 recognises a need to concentrate on delivering new access duties in the short-term.

Several responses refer to issues of responsible access. Three (NGO and individual) ask whether the plan should address wild camping and mountain bothies, with particular mention of Derry Lodge. There is 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 are noted as an important tool 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) suggests that the wide number of existing ranger services does not represent the best opportunity to promote cohesive management.

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

A number of responses comment on actions for route provision and promotion. There is support for the range of routes identified, including functional as well as recreational routes. There is 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) is concerned that a Park-wide trust for access may lack local focus and become too bureaucratic.

One (land managers) response suggests that actions should refer in more detail to establishing a path network rather than simply producing a Core Paths Plan, while others suggest 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 comment on transport provision for access, with several noting inadequate bus services and a lack of timetable information. The actions to address transport issues are 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 suggest further provision of cycle carriage and an extension of this provision to other equipment people use to enjoy the Park (eg skis).

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

Making Housing Affordable and Sustainable

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

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

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

Two responses (land managers) emphasise 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 express confusion about the relationship between these proposals and the National Park Plan and the Local Plan. Many responses express 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 support the objectives of the draft plan to increase accessibility to affordable housing, but are 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.

Making Tourism and Businesses Sustainable

There is a general support for this priority, with a number of suggestions for greater integration with the wider regional agenda to develop the economy and tourism sector in particular. Some suggest 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) feels the section is too much about monitoring and not enough about proactive development of tourism and business. The Economic and Social Development Forum query the balance between tourism and other economic sectors in the plan, and seek clarification about the scope of this work.

With regard to tourism and visitor information, one response (business) suggests the plan is vague about promotion of the Park and the potential use of Tourist Information Centres for information provision. It also notes the need for careful co-ordination of website information to avoid duplication and conflicting messages. Another (individual) notes that there is no mention of interpretation as a tool in this section. Several (public) indicate 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 focus on support for the tourism and business sector. They include 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 express concern at a reliance on tourism, there is a general view that support should concentrate on developing the quality of tourism and businesses. There appears 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) suggests that publicly-owned visitor facilities can inhibit diversification of private businesses. However, there is a common view that the focus should be on striving for excellence, including benchmarking and training.

One response (public) highlights the social aspects of seasonal jobs, 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 suggest 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 note a particular desire that all businesses should become more environmentally aware in their activities.

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

Developing Awareness and Understanding of the Park

There is support for promotion and raising awareness of the Park as a priority, but also a view that the action plan should be more focused and clearer about what it seeks to achieve. One response (individual) highlights the lack of coherent identity at the moment. In particular, there is 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 indicate that this programme should include some international dimension within the first five years.

A number of responses and meetings highlight the importance of communities in developing awareness and understanding, including gateway communities outside the Park, and stress the resource that exists in communities to help others develop understanding and awareness of the area. One (community) notes it is important to work with all community groups, not just Community Councils, and another highlights 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 note 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 highlight the potential of targeting the young in establishing awareness and understanding for the future and suggest this should be a focus for resources.

Two responses (public and individual) suggest that Gaelic should be integral to educational and awareness resources, as well as signage around the area. Others suggest that the built and historic environment make a significant contribution to the identity and should form part of a programme to increase understanding. Several also make a point that culture must also be forward-looking and take in the arts sectors, as well as heritage.

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

A number of responses support the proposals to raise awareness and understanding about the special qualities in particular, and the need to increase knowledge of these resources. Responses note there are several mechanisms to assist this, beyond the National Nature Reserves and Ranger Services noted in the draft. Other responses also recommend 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 suggest a greater focus on the built and historic environment is needed.

5.4 Strategic Environmental Assessment

Relatively few comments on the Strategic Environmental Assessment are made. The three Consultation Authorities indicate that the assessment meets good practice, and give some detailed comments to inform any update. In particular, attention is drawn to some potential negative environmental effects from some objectives in the plan, with suggestions to reword these to ensure these effects are minimised. Explicit reference to likely effects on Natura sites is also requested.

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

6. Feedback to Stakeholders

This report forms the first stage of formal feedback to stakeholders, in particular those who contributed to the consultation on the Draft National Park Plan. Immediately after the close of the consultation in July, a letter was sent to all respondents setting out the process ahead.

This report summarises the comments raised on the Draft Plan. As the National Park Plan is completed, this report will be updated to record what changes have been made to complete the plan, as a result of the issues raised during consultation. The updated report will be published to accompany the completed National Park Plan.

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 have been collated according to sections of the plan. These, together with the original responses are being 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 publicly available from the National Park Authority on request, except where respondents have requested confidentiality.

The National Park Authority intends to complete the National Park Plan by the end of 2006 for submission to Ministers. It is currently using the responses and holding further discussions where necessary to make changes to the draft and complete the text of the plan.

The key milestones in the process to completion are:
- 8th September 2006 – publication of this Interim Consultation Report;
- 3rd November 2006 – Cairngorms National Park Authority Board consideration of main changes

- 1st December 2006 - Cairngorms National Park Authority Board consider the completed text.
- December 2006 – The Advisory Panel on Joined-up Government consider the completed plan.

For further information or queries please contact:

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ANNEX I – List of Respondents

Public Bodies

Aberdeenshire Council
Angus Council
Bord na Gaidhlig
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 Gaidhlig
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 & 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

Date	Meeting/Group	Location	Topics for discussion	Number Attending
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 & 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