
CAIRNGORMS NATIONAL PARK AUTHORITY

FOR DECISION

**Title: CAIRNGORMS NATIONAL PARK PARTNERSHIP
PLAN 2022-27**

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Purpose

To seek the Board's agreement to the National Park Partnership Plan 2022-27 and its submission to Scottish Ministers for approval.

Recommendation

That the Board consider and agree the Cairngorms National Park Partnership Plan 2022-27 for submission to Scottish Ministers for approval.

NATIONAL PARK PARTNERSHIP PLAN 2022-2027 FOR DECISION

Strategic Context

1. The National Park Partnership Plan is the management plan for the National Park. Every five years CNPA has a statutory duty to prepare a plan and submit it to Scottish Ministers for approval. The plan sets out how the relevant partners will work together to address the big issues affecting the National Park.

Public Consultation

2. The CNPA held an informal consultation from June 2021 until September 2021 to pick up initial key issues that people wanted to see tackled in the plan. In total 279 responses were received and a further 185 comments gathered from social media plus 20 qualitative face-to-face interviews.
3. Following this the CNPA held a formal public consultation from 23 September to 17 December 2021. A total of 1453 responses were received on-line, by post or by email. This is the largest ever response to an NPPP consultation and 4x those received during the last formal consultation in 2016. The response included feedback from over 50 organisations and interest groups, from land managers to local businesses, healthcare providers to community groups. The draft plan was discussed with all the Park-wide forums during this period and feedback from the consultation was incorporated into the final draft plan.
4. The staff of the National Park Authority also met with many groups and organisations multiple times throughout the past year to discuss and develop the plan. This included regular updates and discussions with members of the NPPP Stakeholder Group and regular sessions with the CNPA Board to discuss proposed changes to the Plan.
5. Further detail on the consultation process can be found in the consultation report at Annex 2.

The Partnership Plan

6. The Plan sets out the vision, outcomes and national context for the Cairngorms National Park. The introduction to the Plan sets out background information, the role of the Cairngorms 2030: Heritage Horizons programme and the overall vision for the National Park.
7. For each section on Nature, People and Place, the plan sets out:
 - a) Outcome
 - b) Objectives
 - c) Targets / Indicators
 - d) Actions
 - e) Partners

8. There is also for each section a set of policies for the National Park for the next 5 years. These have been revised following consultation responses.
9. Finally, the Plan sets out the approach to Capital Investment, Regional Spatial Strategy, Regional Land Use Partnership and Research.

Nature

10. The consultation demonstrated significant overall support for the approach set out in the Nature section. 66% of people agreed with the Nature objectives and 75% agreed with the overall outcome. Those who didn't agree split into roughly two camps – those who felt the plan hadn't gone far enough, and those who felt the plan had gone too far. There was higher support from residents and visitors and less support from the land management community. Work has been carried out over the past 5 months to discuss the issues raised with organisations, clarify language, revise objectives, targets and actions and to add a narrative section to each objective to make the reasoning behind each objective clearer.
11. The major changes from the draft Park Plan are as follows:
 - a) Clarification around the woodland targets, recognition of the value of commercial woodlands and protection for in-by agricultural land from wholesale planting.
 - b) Increase in the peatland target following mapping work.
 - c) The red deer objective has been revised to include reducing impacts and the target densities will be assessed at DMG scale.
 - d) Gamebird management has been separated from moorland management with a focus on establishing evidence around impacts on native biodiversity.
 - e) Fire management has been revised and will be in line with developing work on muirburn licencing.
 - f) Specific species work has been drawn out to include evolving work on capercaillie and beaver and action to tackle wildlife crime has been strengthened.
 - g) The approach to green finance has been strengthened to include community benefit and to consider future options through the Land Reform Bill.
 - h) Objectives have been merged where there was overlap to provide greater clarity.
 - i) Wording has been revised throughout to make objectives clearer and measurable. Actions have been developed in consultation with relevant organisations.

People

12. The consultation demonstrated significant support for the approach adopted in People section of the plan from all groups. 74% of people agreed with the People objectives and 83% agreed with the overall outcome. Work has been carried out over the past 5 months to discuss the issues raised with organisations, clarify language, revise objectives, targets and actions and to add a narrative section to each objective to make the reasoning behind each objective clearer.

13. The major changes from the draft Park Plan are as follows:
- a) The working age population objective has been strengthened as a key issue in the National Park
 - b) The well-being economy objective has been given a strengthened narrative to ensure clarity of purpose.
 - c) Skills and training have been strengthened as an issue mentioned by many organisations as a key enabler of a just transition.
 - d) A Park for All has been strengthened to include residents and visitors and provide an overall approach to equalities work in the Park.
 - e) Objectives have been merged into other objectives where there was overlap to provide greater clarity.
 - f) Wording has been revised throughout to make objectives clearer and measurable. Actions have been developed in consultation with relevant organisations

Place

14. The consultation demonstrated significant support for the approach adopted in Place section of the plan from all groups with particular support for tackling the issue of affordable housing. 84% of people agreed with the Place objectives and 85% agreed with the overall outcome. Work has been carried out over the past 5 months to discuss the issues raised with organisations, clarify language, revise objectives, targets and actions and to add a narrative section to each objective to make the reasoning behind each objective clearer.
15. The major changes from the draft Park Plan are as follows:
- a) Housing has been brought to forefront and type of housing has been expanded to include all affordable that are 'in perpetuity'.
 - b) Transport has been revised to reduce the target to 20% reduction in car use by 2030 from 50% as it was felt the draft target was not deliverable in the timescale.
 - c) Increased linkages in transport section to Cairngorms 2030: Heritage Horizons as key delivery mechanism for transport.
 - d) Objectives have been merged into other objectives where there was overlap to provide greater clarity.
 - e) Wording has been revised throughout to make objectives clearer and measurable. Actions have been developed in consultation with relevant organisations
16. Further details of changes to the Plan following consultation can be found at Appendix I and the consultation report is at Annex 2.
17. The plan submitted to Ministers will include 5 maps – Current Habitats, Degraded Peatland, Current Deer Densities, Visitor Infrastructure and a Regional Spatial Strategy summary. It will also show visual representations of the overall park vision.

Submission to Ministers

18. The National Parks (Scotland) Act requires that the plan is submitted to Scottish Ministers for approval. We will submit the plan together with the background information including the consultation report and assessment reports subject to Board approval by the end June.
19. The plan presented here is in a working format, it will then be designed in a visual format and style ready for publication once approved by Ministers.
20. A ministerial launch with partners will be held in the Cairngorms once the CNPA receives formal approval for the Plan from Scottish Government.
21. An executive summary will be produced, and a leaflet sent to all households in the Park at the time of the launch. All respondents to the consultation will be kept up to date through regular bulletins and the website will be updated in due course.

Delivery and Reporting

22. Once approved by Ministers we will continue to work with partners to co-ordinate and monitor delivery. It is proposed that there is an annual public report produced on the delivery of the Plan, a ministerially chaired annual meeting of partners and 6 monthly updates to the CNPA Board focusing on any key challenges.
23. The actions in the Plan will form the core of the work of the CNPA over the next 5 years and will be taken forward through the development of the CNPA corporate plan.

Appendix I – NPPP4 Changes Following Consultation Feedback

General comments across all sections

- **Objectives being more focused / specific:** There were a number of comments about objectives not being clear enough and / or there being too many of them, both in the nature section and elsewhere. The final draft has tightened many of the objectives up and provided clear rationale as to the reasons behind the targets and objectives. Objectives have also been combined where possible to reduce the total number from 41 to 35.
- **Education and awareness-raising:** Some commented that there was a need for more education and awareness-raising about the environment. This has been picked up in the People section, objective BI I: *“We will work with other national parks, partners and communities to provide meaningful opportunities for people to experience and care for nature in the Cairngorms, and support communities in maintaining and improving their local environment.”*
- **Being clearer about the Park Authority’s remit:** Some respondents questioned whether the Park Authority were best placed to lead on a couple of the Place objectives. As this is a partnership plan for the whole National Park and not for the Park Authority alone, a ‘partners’ section has been included alongside all objectives to clearly outline who will be responsible for taking forward these areas of work.

Nature

- **More ambitious:** People were keen for the plan to be more ambitious in tackling both the climate and nature crises, setting out a timetable for going beyond net zero to a carbon negative position. The Park Authority is working with Small World Consulting to establish firm targets for the National Park and Park Authority to achieve both net zero and a carbon negative position, and the target for peatland restoration has also been raised from 35,000 ha to a minimum of 38,000 ha (a 9% increase).
- **Making private finance work for nature and communities:** Concerns were raised about the risk of ‘greenwashing’ in the area of private finance in the National Park. In the narrative for this objective, the following information has been added: *“We believe that the purchase of land for green investment must deliver long-term benefits and be in the public interest. Benefits must be shared between the owner and local communities.”* An action has also been created linked to the development of the proposed Land Reform Bill.
- **Right tree, right place:** Some respondents were concerned that the woodland expansion targets would lead to ‘indiscriminate tree planting’, including on prime agricultural land. This has been addressed directly in the new draft plan: *“Our guiding principle in the National Park is ‘the right tree in the right place for the right reason’... There is also a need to ensure that the relatively limited area of in-bye land in the National Park continues to play a part in the nation’s food security and is protected from wholesale conversion to woodland.”*

- **Action on wildlife crime:** A clear action on wildlife crime has been added under A13: Species recovery, saying: *“Reduce wildlife crime in the National Park, with a specific focus on eliminating it as a constraint on raptor numbers and range occupancy in the National Park.”*
- **More species-specific activity:** Clear actions have been added to objective A13: Species recovery on capercaillie, beaver and raptors, with an additional action saying: *“Deliver species recovery plans for priority species through the Cairngorms Nature Action Plan.”*
- **Recognising the role of moorland management:** Whilst an area of contention – with strong views on either side of the debate – the important role moorland managers play in supporting nature recovery in the National Park has been recognised. Gamebird management has also been split out from moorland management, with a focus on establishing evidence around impacts on native species. An explicit reference to a new national licensing regime has also been added in response to a number of comments on the subject. The narrative for objective A5 – Moorland management says: *“Moorland management plays a significant role in supporting a range of habitats and species in the Cairngorms and is an important part of its culture and economy. During the lifetime of this plan a new national licensing regime for grouse moors is due to be introduced by Scottish Government.”*
- **Deer density targets and wider herbivore impacts:** Whilst the deer density targets remain in the plan (this is one of a number of important measures that will help the National Park meet peatland restoration, woodland expansion and habitat recovery targets), the objective has been changed to include a focus on herbivore impacts on ecological restoration targets. This recognises the fact that, whilst density is still a valuable tool widely used in deer management, an additional measure of impacts provides the evidence for action and indicators of success.
- **Collaborative working:** Some respondents suggested that more collaborative working and skills / training opportunities were required, particularly for land managers. This has been taken on board throughout the new draft (e.g. in the skills and training section below) and includes the following on deer management: *“We also need to consider how best to support estates to deliver deer management targets and how best to support stalking employment and the skills that will be needed to do this work over the long-term.”* An explicit cross-reference has been added to People objective B4 to increase skills and training opportunities, plus an action to *“Support skills training programmes relevant to business needs and changes in land management within the National Park.”* A proposal has also been added to establish a community climate action hub for the National Park to promote a collaborative approach to delivery.

People

- **Provision of affordable housing:** A common concern was the lack of affordable housing for local residents and workers. Whilst these issues were addressed in the Place section of the draft plan, they have been pulled to the start of the Place section in the final draft in recognition of their importance. Affordable housing has also been recognised as a priority in the introduction to the overall plan, and in various sections throughout the document, eg *“Access to housing for people who live and work in the area is a key issue for the Cairngorms National Park. We need to increase access to*

affordable housing and the housing market in the Cairngorms requires urgent change to support local, essential housing for workers and young people.”

- **Skills and training:** Many participants wanted the plan to include skills and training opportunities to support changing land management practices and encourage younger people to stay in the National Park. This has been pulled out in the narratives in the Nature section for objectives A3 – Peatland restoration and A4 – Deer and herbivore impacts (*“We need to consider how best to support... stalking employment and the skills that will be needed to do this work over the long-term”*), and in the People section objectives B1 – Working-age population, B4 – Skills and training, and B5 – Community assets and land.
- **Equalities, diversity and inclusion:** It was felt by some participants that the plan needed to provide more explicit support for a range of under-represented groups in the National Park. Housing was one key consideration, and this section has been updated to say: *“There is also a need to support housing which addresses the needs of... those facing economic hardship, people with disabilities, ethnic minority communities and LGBTQ+ communities.”* Specific actions have been added in to encourage Disability Confident and Carer Positive employers, and to support the Young Person’s Guarantee.
- **Community ownership, community benefit:** A number of respondents questioned the draft wording of the community ownership objective, saying that it should be explicit about community ownership delivering increased community benefit, and that community management could be just as significant in some areas. This wording has been amended accordingly. It was also identified that further training and support would be required to ensure communities could take forward these projects with confidence. Objective B5 now includes the following: *“Develop targeted skills initiatives to support social enterprises”* and *“Support communities to acquire and manage assets / land through enhanced funding and training support.”*
- **Stabilising the population of the National Park:** Some respondents to the consultation felt we needed to be clearer about what was meant by ‘stabilising’ the population of the National Park. This objective (B1) now includes a comparison date of 2020 to measure population change against, and emphasises the young and working-age population, saying: *“The proportion of young and working-age people in the National Park increases relative to the total resident population, which remains stable”*.
- **Gaelic and celebrating wider cultural heritage:** A range of views were expressed on our approach to Gaelic, with a number of respondents also highlighting the importance of Scots and Doric. This latter point has been recognised in Place objective C10 – Cultural heritage: *“There is also a need to recognise the role of Doric and Scots in the National Park (alongside that of Gaelic) and to support its use where appropriate.”*

Place

- **Improving public transport:** Points were raised on the need to improve public transport to and around the National Park. Whilst this was included in the original draft plan objectives, the new draft includes more detail on the Heritage Horizons: Cairngorms 2030 programme, which has a key objective of *“working with communities and partners to improve public transport and better connect the National Park”* through

seven specific transport and active travel projects. Objective C7 also states that *“There is a need to improve public transport to cater for residents, commuters and visitors”*.

- **Affordable housing and controls on second homes / short-term lets:** As referenced in the People section above, this was seen as the number one priority by the majority of those who responded to this section. This has been recognised and the three objectives on this topic – C1 – Access to housing, C2 – New housing and C3 – Housing and community benefit – have been moved to the start of the section, with a more detailed rationale behind the targets included. People also asked for more detail on second homes / short-term lets, something that is covered in Objective C2: *“We need to understand better the economic and social dynamics behind second homes, vacant and short term lets and reduce the loss of existing or newly built properties to such uses.”*
- **Spreading visitors out (time of visit and location):** A small number of respondents referenced a need to spread visitors around the National Park to relieve pressure on ‘honeypot’ sites and to spread the economic benefits of visitors around. Objective C5 – Visitors to the Park now says: *“Our ambition is to see the benefits of the visitor economy being realised more widely across the National Park and pressures eased, with more focus on the off-peak season.”*
- **Active travel and vehicle usage:** Many respondents were keen for the draft plan to say more about active travel, e.g. improved path and cycle networks, with a specific focus on accessibility. Whilst this was covered in detail in the original draft and in the Heritage Horizons: Cairngorms 2030 programme, the latest version includes the following additional detail: *“Improve path, cycle and outdoor access networks to give outstanding opportunities to experience the natural and cultural heritage of the National Park to the widest range of people.”* Some residents also felt the plan was being too ambitious with the target of >50% of journeys not taking place by private car, pointing to the rural nature of the National Park and the medium-term shift towards electric vehicles. This target has been adjusted to 20% in line with Scottish transport commitments.
- **Improving visitor infrastructure, including accessible toilets:** Amongst the consultation responses, a number of people wanted to see a more explicit commitment to improving visitor infrastructure (for example, campsites and toilets). Objective C9 – High quality visitor infrastructure now says: *“There is also a need to ensure that our visitor infrastructure is of high quality and helps us to give every visitor a great experience of the UK’s largest national park.”* It also includes a specific action on accessible toilets.
- **Diversifying the economy:** A number of people commented that they would have liked more emphasis on economic diversification, particularly in the area of sustainability and the circular economy. Objective B4 now includes the following: *“Encouraging and supporting businesses throughout the National Park to use nature-based solutions to support a diverse economy and employment will help make the Cairngorms an exemplar for rural economies across Scotland and the rest of the UK.”*

There were also a number of changes and additions to policies and actions in the partnership plan to ensure a robust set of deliverable measures between 2022 and 2027.

Supporting Information

Annex 1 – Cairngorms National Park Partnership Plan 2022 – 2027

The draft plan for submission to Scottish Ministers.

Annex 2 - Consultation Report

Detailed report setting out responses to the consultation.

Annex 3 – Strategic Environmental Assessment & Habitats Regulations Appraisal

To ensure that the NPPP does not have any significant adverse effects on the environment a Strategic Environmental Assessment (SEA) has been carried out in accordance with the Environmental Assessment (Scotland) Act 2005. The SEA Environmental Report concludes that the effects of the final NPPP are predicted to be overwhelmingly positive.

The NPPP has been subject to the Habitats Regulations Appraisal (HRA) process. The purpose of the HRA is to determine whether the NPPP would be likely to have a significant effect on any European site, either individually or in combination with other plans or projects. The final NPPP has therefore been screened for its likely significant effects. The HRA Report concludes that the NPPP will not adversely affect the integrity of any Natura site.

Annex 4 - Equalities Impact Assessment

The NPPP has been subject to the Equalities Impact Assessment (EqIA) process in accordance with the Equality Act (2010).