
CAIRNGORMS NATIONAL PARK AUTHORITY

FOR DECISION

Title: National Park Plan Review Consultation Report

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Purpose

To update the Board on the analysis of consultation responses to the draft Cairngorms National Park Plan and to ask for a steer on how to address the main issues raised in the development of the Plan.

Recommendations

It is recommended that:

- a) **The Board accept and consider the report of consultation analysis on the draft Cairngorms National Park Plan.**
- b) **The Board give staff a steer on how to address the issues raised by consultation on the draft National Park Plan in developing the final Plan.**

Executive Summary

The analysis of written consultation responses to the draft Park Plan is now complete and the National Park Plan continues to be developed using the responses and further discussions with partner organisations. The consultation provided a lot of support for the content in the draft Plan; helpful feedback on different people's priorities for the Park; what they consider makes it special; on the detail of work programmes; and offers of help or involvement in future.

There were three areas of the draft Plan where respondents provided polarised views. Individuals and environmental/voluntary organisations did not want housing built in the Park, or only wanted affordable/local needs housing. Many of the same people did not want the economic growth in the Park. In each case the argument was based on an assumption that it would harm the special qualities of the Park. On the approach to wildness, a number of respondents were critical because they considered that not enough was planned to support it, while others considered the approach was unrealistic and unachievable.

Although it is not possible to do what all groups want or in the ways they want it done, the responses are helping us to develop a Plan that delivers of all four National Park aims together. Further discussions with delivery partners are taking place to refine and improve work programmes and finalise the Plan. On 19 March a meeting of the main delivery partners takes place to secure collective and individual commitment to the priorities and work programmes in the Plan.

NATIONAL PARK PLAN CONSULTATION ANALYSIS REPORT FOR DECISION

Background

1. Public consultation on both the draft Cairngorms National Park Plan and the Main Issues Report for the Local Development Plan was held from 19th September to 9th December 2011. This paper provides highlights the key issues emerging from the analysis of consultation responses. A full Consultation Analysis Report of the written responses to the draft Cairngorms National Park Plan, by ODS consulting, is included as Annex 1 to this paper. Board members have also been sent a CD with the individual responses to note and for reference. The Consultation Analysis Report and the consultation responses themselves will be published on the CNPA website unless anonymity was requested.
2. The consultation responses and the consultation report are helping the CNPA to prepare the final Cairngorms National Park Partnership Plan. A working draft of the Plan is available in Annex 2 to this Paper. It demonstrates some of the changes that can be made to the Plan to address feedback to the consultation as well as ongoing discussions with partners. It is not the final Plan, and will continue to develop and change before the Board have the opportunity on 11 May 2012 to endorse it and submit it to Scottish Ministers for approval.

Overview of Consultation on the Draft Cairngorms National Park Plan

3. We wrote the draft National Park Plan to challenge people to think about the National Park; about what makes it special; and to tell us about how to improve the Plan. For the most part, this was successful and many respondents provided constructive and thoughtful feedback on a range of subjects and issues. There was a lot of support for most of the draft Plan, and while some respondents disagree strongly with some parts of it, many have indicated they could or would provide help in future even in small ways. We will make sure that the delivery of the Plan harnesses this collective interest as effectively as possible.
4. A total of 88 responses to the consultation on the draft Cairngorms National Park Plan were received (listed in Annex 1 of the Consultation Report): 35 Individuals; 16 from the public sector; 14 from Non-governmental or voluntary organisations; 8 from or on behalf of estates; 8 from community councils or associations; and 7 from business interests including both the Cairngorms Business Partnership and Federation of Small Businesses as representative organisations.
5. During the consultation, CNPA staff also had informal discussions with a wide range of partner organisations about the content of the draft Plan, and about potential future work. Those discussions continue with many partners as we move towards finalising the Plan and identifying and prioritising the work that can be done to deliver it. In addition, separate workshops were held for Scottish Environment Link members and for Scottish Land and Estates members. Those discussions helped provide feedback on the draft Plan as well as identify areas of possible future work in the Park. The Cairngorms Business Partnership undertook its own workshops on

the draft Plan and their draft response at their Business Conference, as well as surveying its members on their response.

6. In addition to the written responses, we received feedback from the ten community information sessions held across the Park during the consultation that were attended by nearly 400 people. Notes of the points raised at the meetings were recorded and published on the CNPA website the following day. For the most part, this was not feedback on the detail of either the draft National Park Plan or the Main Issues Report, but was a good reflection of the issues that those who attended the sessions considered to be most important. Clearly, many issues raised were specific to individual communities or to individual perspectives at the meetings. However, some common issues emerged from those meetings:
 - a) Concern about scale of future housing development in many communities
 - b) Desire for housing that meets the needs of individual communities
 - c) Desire to see better design in new development
 - d) The need for better or any IT and mobile connections for communities and business
 - e) Pride in natural and cultural heritage
 - f) Economic fragility of communities and business and need for support and diversification
 - g) Opportunities for young people (particularly around skills and training)

The Big Issues from the Consultation

7. Much of the feedback from the consultation is linked to detail in approaches to delivery or to different interpretations of policy and its implications. The Consultation Analysis Report (Annex I) is based on the questions asked in the draft Plan, and most individuals and organisations responded to those questions.
8. The Cairngorms Business Partnership took a different approach, preparing a 'Business Manifesto' to set out a clear business perspective for the National Park. The Business Manifesto is not referred to in the Consultation Analysis Report, but has informed the development of the Plan and discussions with many partners about how to address it.
9. One individual did not respond directly to the draft Plan but provided opinion and advice on the corporate responsibility of the CNPA; its duties under Human Rights; and implications for housing policy and the planning system. Those points are being considered within the context of legal advice and our own approach to reviewing and improving best practice, but not within the National Park Plan itself.

Housing and the scale of future development

10. Most environmental non-governmental organisations and many individuals' responses were critical of the established housing land supply within the Park and this was reflected throughout their responses to many parts of the Plan. Their arguments have three broad themes:
 - a) That there should not be new open market housing within the Park or that there should be much less than is planned for, either because it will not be needed or because it will undermine the special qualities of the Park; and/or

- b) That only affordable housing or local needs housing should be built in the Park; and/or
- c) That there should not be in-migration or population growth in the Park because more people will erode or damage the special qualities of the Park.

The Economy

- 11. The second substantial issue from the consultation is the split in opinion over the need for or desirability of economic growth in the Park. There was overall support for growth and diversification of the economy, reflecting an issue that was raised in the community consultation. However, a number of non-governmental or voluntary organisations clearly considered that it was not appropriate either in general or within the Park. For most of these groups the objection was based on an assumption that economic growth would inevitably erode or damage the Park's special qualities.
- 12. The view of the Cairngorms Business Partnership, supported by the Federation of Small Businesses, was that greater direction and coordination for growth and diversification of the economy of the Park is required for the future. The Cairngorms Business Partnership proposed the establishment of a Cairngorms Enterprise Forum for the Park, chaired by the private sector but bringing together all the relevant public and private bodies to develop and deliver an economic development and diversification strategy for the Park. The Business Partnership also identified the priorities they consider the economic development and diversification strategy should tackle.

The approach to Wildness

- 13. The Board set an ambitious outcome to increase the qualities of wildness in the Park over the next five years in the draft Plan. There was almost unanimous support for this from environmental non-governmental organisations, combined with a view that much more than was planned needed to be done to achieve it. A large number of suggestions of how to achieve were provided from their perspective.
- 14. A different view was provided by other groups who questioned whether the outcome was achievable or necessary. These views were based on the both the effect of the identified work packages, the practicality of other measures, and the likelihood of change outside the Park.

Recommendation

- 15. **It is recommended that:**
 - a) **The board accept and consider the report of consultation analysis on the draft National Park Plan.**
 - b) **The board give staff a steer on how to address the most significant issues raised by consultation on the draft National Park Plan in developing the final Plan.**

How we are taking account of responses generally and improving the Plan

16. As the Plan develops, we take account of responses and try to address concerns wherever possible. However, it is not possible to do what all respondents would like or argue for. The CNPA's duty is to provide a plan for the collective delivery of the four aims of the Park and to so, we must balance high aspirations with realistic resources and pragmatic management. There are judgements to make about how to approach different issues based on all the available information and knowledge of resources. Respondents to the draft Plan may give different weight to different issues than the CNPA, or may choose to ignore issues that the CNPA or other partners need to address. The working draft Plan in Annex 2 gives a sense of how the plan could develop. It is a starting point, not the final Plan. It will continue to develop over the next two months.

Vision and 3 Long Term Outcomes (page 3, Annex 2)

17. The vision for the Park remains unchanged, but we have developed three long term outcomes to deliver it that provide a focus for the rest of the Plan:
- a) A sustainable economy supporting thriving businesses and communities;
 - b) A special place for people and nature with natural and cultural heritage enhanced;
 - c) People enjoying the Park through outstanding visitor and learning experiences.

The Special Qualities (pages 4-5)

18. The consultation responses to the draft Plan showed how diverse people's opinions of the special qualities of the Park were. People provided many additional examples and detailed description of why they consider the Park to be special. That feedback will be helpful in developing work over the life of the Plan and in any future research into the special qualities of the Park. However, they are mentioned in the Plan to acknowledge them and give a sense of their breadth and nature, not as an authoritative list. We have suggested a brief summary of them, combined with practical principles to guide management in future.

Our Long Term Direction (pages 9-11)

19. There were mixed views in the consultation to the question about updating the long term outcomes of the current National Park Plan. Some considered them unnecessary, while some thought they gave clarity and explanation to the long term vision. Our suggested approach is to update them to both reflect changes in context as well as to provide a more accurate and explicit view of the future the Plan is working towards.

Delivery (pages 12-35)

20. In response to a number of consultation responses and discussions with partners, we have tried to simplify the structure of the Plan. One of biggest changes is through bringing the policy framework from the 'Land Use Strategy' section of the draft Plan together with 5-year outcomes and work to deliver them. The Plan as a whole can

now be considered the Land Use Strategy for the Park, but in any case, the changes should make the Plan easier to understand for those who need to use it and well as any other reader.

21. The delivery section is now split into three parts linked to the three long term outcomes. Each of the three parts now has a context section that summarises the issues that need to be addressed and the overall approach to delivering the long term outcome. It also highlights what action will be taken to mitigate or adapt to the effects of climate change.
22. Following each context section, the relevant 5 year outcomes that will contribute to the long term outcome and the relevant indicators and targets are listed. This is followed by a list of policy objectives to support delivery and the programmes of work to deliver the five year outcomes.
23. The delivery sections are the parts of the Plan that have changed most as a result of the consultation responses and discussions with partners. Where the draft Plan had ideas and options based on discussions with partners, the final Plan needs to have support and commitment from those partners with the resources to deliver change. The next three paragraphs highlight some of the significant changes under each long term outcome.

A sustainable economy supporting thriving businesses and communities

24. The suggested approach to this section is to set out an explicit desire for growth of the economy and to increase the numbers of workers in the Park. It highlights a difference in approach between Badenoch and Strathspey and other parts of the Park in planning for housing land requirements. It also sets out that any extra flexibility in land supply, above the capacity of the identified land supply, should be in small sites around settlements rather than additional large sites. This section sets the Economic Forum and development of an economic growth and diversification strategy as a work package under a 'Supporting Business' programme.

A special place for people and nature with natural and cultural heritage enhanced

25. This section takes much of the draft Plan's 'Land Use Strategy' within its policy section and incorporates work to improve the quality of design and the attractiveness of towns and villages as well as the wider landscapes of the Park. We have suggested that the 5 year outcome that was solely related to wildness is changed to be about the special landscape qualities of the Park. Wildness is one of those qualities, but there are others that are important, help support wildness, and can be more effectively managed. An outcome that was about getting a programme of targeted advice and support for land managers has been replaced with a work programme to do it.

People enjoying the Park through outstanding visitor and learning experiences

26. The suggested approach to this section is changed little overall. A further five year outcome to meet or exceed the expectations of visitors is proposed to give a clear focus to the development of sustainable tourism and visitor management, reflecting

how important the Park is for all sorts of visitors. A new 'Sharing the Stories' programme of work has been proposed to bring together the work that goes into helping visitor facing staff, promoting the Park, sharing heritage with different audiences and promoting responsible behaviour.

Next Steps in Plan Preparation

27. Partnership meeting with National Park Plan partners 19th March to confirm focus of plan and seek partnership commitment.
28. Continued work with partners to follow up responses and develop proposals in final Plan.
29. Board consider Plan and associated Assessments on 11th May for submission to Ministers for approval.

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