

Consultation Analysis on Draft Cairngorms National Park Plan

Cairngorms National Park Authority

Final Report

March 2012



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Appendix One – List of Respondents

1. INTRODUCTION

About this report

- 1.1 This report provides an analysis of responses to Cairngorms National Park Authority's consultation on the draft Cairngorms National Park Plan 2012-17. It gives a detailed analysis of the responses to the consultation questions and provides an analysis of the views of particular groups, highlighting trends and issues where appropriate.

Background to the consultation

- 1.2 Cairngorms National Park Authority (CNPA) is in the process of developing a new National Park Plan for the period 2012-17, building on its first National Park Plan published in 2007. The National Park Plan provides the direction and framework for the future of the National Park. It sets out the strategic context and vision for the Local Development Plan. The public consultation period ran from 19 September to 9 December 2011.
- 1.3 The draft sets out a long-term vision and objectives for the Park, and outlines how the CNPA will deliver the four aims of the National Park in a "collective and co-ordinated way" over the next five years. Following the consultation exercise, the CNPA will review the draft, before submitting a final Cairngorms National Park Plan 2012-2017 to Scottish Ministers for approval in 2012.
- 1.4 The public consultation period for the Park Plan ran from 19 September to 9 December 2011.
- 1.5 In addition to the Park Plan, CNPA also consulted on the Local Development Plan Main Issues Report. The Main Issues Report sets out choices for land allocation that could be made for development, and for policies that the CNPA and its constituent local authorities will use to make decisions on applications for planning permission. A separate report has been prepared analysing the consultation response on the Main Issues Report.
- 1.6 A total of 88 responses were received to the Park Plan consultation. Two responses were discounted as a result of campaigning meaning that 86 responses have been considered in the analysis. A full list of respondents is given as Annex One.
- 1.7 The consultation included 28 main questions in relation to the draft Plan – subdivided into a total of 96 questions. Respondents were able to provide either an open response or complete the consultation questionnaire offering systematic responses to each of the consultation questions. At the end of the consultation questionnaire respondents had the opportunity to give general or additional comments.

- 1.8 The analysis was undertaken using a response matrix. Respondents were categorised into stakeholder groups and responses were fed into the matrix in accordance with the answer to the consultation question. General and additional points that did not relate to the questions were fed into a separate section of the matrix and treated manually.
- 1.9 Some respondents chose not to answer the consultation questionnaire. These responses were read thoroughly and where the respondent directly answered any of the questions, the comments were fed into the appropriate place on the matrix. Substantive comments were treated separately as with other responses.

2. OVERVIEW OF RESPONSES

Introduction

2.1 This section gives an overview of the responses that were received to the consultation. It considers who the responses came from, who was not represented in the response, and gives general comments on the responses.

Who replied to the consultation?

2.2 The consultation was promoted through the Cairngorms National Park website.

2.3 A total of 88 responses were received to the consultation from 89 organisations and private individuals. One response was a joint submission from The Cairngorms Campaign and The Scottish Wild Life Group.

2.4 There was some evidence of ‘campaigning’ with three private individuals submitting identical responses. As such these have been treated as a single response with two responses disregarded – meaning that 86 responses have been considered in this analysis. The responses came from a range of organisations and 33 private individuals. A number of responses were submitted later than the original consultation deadline but have been included in the analysis.

Type	Total received	% of responses
Private individuals	33	38
NGOs/ voluntary organisations	14	16
Other public bodies	13	15
Land owners/ managers	8	10
Community organisations	8	10
Other private businesses and business interests	7	8
Local authorities	3	3
Total	86	100

2.5 As Table 2.1 shows, the largest group of responses (33 - 38%) came from private individuals. The next largest groupings were NGOs/ voluntary organisations (14 – 16%) and other public bodies (13 – 15%). Ten per cent of responses (8) came from land owners/ managers (principally land owning estates). Seven responses (8%) came from community organisations (such as Community Councils), seven responses (8%) came from other private businesses and business interests and three responses (3%) came from local authorities (Aberdeenshire, Highland and Perth and Kinross Councils).



- 2.6 In addition to the issue of campaigning there was some ‘sharing’ of responses. For example, there were very similar (but not identical) responses submitted by Dunachton Estate and The Crown Estate. There were also strong similarities between the response from Badenoch and Strathspey Conservation Group and The Cairngorms Campaign/ The Scottish Wild Life Group. These ‘shared’ responses are treated as distinct in the analysis as they do not represent pure ‘campaigning’ to influence the outcome of the consultation.

The interpretation of quantitative and qualitative information

- 2.7 The background analysis used a quantitative approach to demonstrate how strongly different elements of the draft Plan were supported or opposed. Whilst this is a useful way to see the general opinion among respondents, it has not been relied on as the main method of analysing views and identifying key themes. Generally, we feel that the quantitative information should be treated with caution due to the different way respondents have answered the questionnaire (with, for example, respondents indicating their support or disagreement to a proposed outcome but then making similar comments about it). In addition, a number of respondents chose not to use the consultation questionnaire.
- 2.8 Because of these issues, a qualitative approach has been the main focus of the analysis, based on what people said and trends in views. This qualitative approach has allowed us to identify the key themes emerging from the consultation and particular areas of agreement and disagreement among respondent grouping.

3. RESPONSES TO THE CONSULTATION QUESTIONS

Introduction

3.1 This section analyses the responses received to each of the consultation questions, in terms of a quantitative overview and summary of the key points made by respondents.

Question 1: What makes the National Park special to you?

3.2 Just under a quarter of respondents (21) gave comments in relation to this question. There were a range of comments primarily focusing on the natural assets of the Park (its landscape and habitats), the communities and cultural heritage within the Park area, and the recreational opportunities presented by the Park.

3.3 Several respondents from across respondent categories commented on the unique character of the landscape including its vastness and geological features. Some commented on the diversity of habitats and wildlife within the Park and there was strong appreciation of the Park's mountains as well as its forests and woodlands. NGOs/ Voluntary organisations and private individuals felt that the wildness of the Cairngorms was a particularly special quality.

"We have ... for years recognised the priceless character of the special wild land qualities and wonderful natural amenity provided by habitats from the strath to the high tops."

(Badenoch and Strathspey Conservation Group)

"The scale of the landscape, the combination of the mountain massif and wide heavily wooded straths, with remnant Scots pinewood, the knowledge of the presence of iconic species, the essence of wildness."

(Scottish Campaign for National Parks - SCNP)

3.4 Several organisations commented on the range of communities living in the Park.

"The Cairngorms is a huge area with a varied range of interests and culture who will do their utmost to maintain their identity."

(Rothiemurchus Estate)

"The National Park is special because of its people, its communities, its rivers, mountains, habitat and wildlife."

(Aberdeenshire Council)

3.5 A number of respondents focused on the Parks unique qualities in relation to recreation and some comments on the benefits this brings to the local economy.



“It is the wildness of the arctic-alpine zone, and opportunities for quiet recreation and physical challenge both in those areas, and on lowland crags that makes the National Park special to mountaineers. This applies both in summer and winter. The feeling of wildness is central to the special experience that the Park offers.”

(Mountaineering Council for Scotland)

“Recreational value is often underplayed as a concept because it is not backed up by statutory designation, and by the related apparatus of management and control. Enjoyment therefore tends to be presented at the end of analyses as an overlay on the ‘important stuff’, when in practice it is a critical justification for the basis of caring for the ‘special values’...”

(ScotWays)

- 3.6 There were also comments on the management of the Park with a particular focus on the shared goal of sustainable land management. There was sense that varying interests work together for this aim.

“The Cairngorms National Park set the standard, on designation, for working with communities towards a common goal, exemplified by the direct elections to the Board.”

(Private individual)

“It is also special because the people, communities, and the agencies working within it make it so by their collective efforts.”

(Aberdeenshire Council)

Question 2: Do you agree with these descriptions of the special qualities?

Type	Yes	No	Neither/ Both	No Response
Private individuals	5	3	3	22
NGOs/ voluntary organisations	6	2	2	4
Other public bodies	4	0	1	8
Land owners/ managers	5	2	0	1
Community organisations	0	0	1	7
Other private businesses and business interests	0	0	1	6
Local authorities	1	0	0	2
Total	21	7	8	50
Percentage	25%	8%	10%	60%
Percentage of those responding	58%	19%	22%	

- 3.7 Less than half of the consultation respondents (36 – 41%) answered this question. Of those that did 58 per cent (21) said that they agreed with the descriptions given although many of these comments included caveats. Nineteen per cent (7) expressed disagreement and 22 per cent (8) gave an inconclusive response (either giving a balanced comment or not directly answering the question). Eighty per cent of ‘other public bodies’ and more



than 70 per cent of land owners/ managers that responded gave a positive response.

- 3.8 Several of those supporting the descriptions welcomed the breadth of elements covered and particularly the consideration of recreation, housing and economic opportunities alongside the natural heritage of the Park. Some noted the importance of striking the right balance in this respect.

“We support the recognition of the special qualities of the Park as extending beyond the natural heritage, and welcome the addition of the cultural heritage, recreation opportunities, tourism, and acknowledgement of the people living and working within the Park as important ‘Special Qualities’.”

(The Crown Estate)

“Agree - although there needs to be a balance between visitors seeking the wildness stated and the space to pursue outdoor activities, which underpin some of the economy.”

(Aberdeenshire Council)

- 3.9 Some respondents including land-owning estates and the Forestry Commission Scotland said that, while agreeing with the descriptions given, there should be more recognition of the role of that farming, forestry and recreational activities (and ‘management’ more generally) play in shaping the landscape.

“We broadly agree with the descriptions of the special qualities. However we believe the Plan should recognise more explicitly that land based business (farming, forestry and sporting) deliver the landscapes and habitats that contribute so significantly to the Park’s qualities.”

(Edinglassie Estate)

“FCS agrees with the description of the special qualities of the National Park, but note that while the appearance of much of the National Park is of “wildness”, it is in fact managed and if the objectives of the NP are to be achieved then sensitive management of land with characteristics of wild land should continue. Forests are often both managed and perceived as having high levels of ‘wildness’.”

(Forestry Commission Scotland)

- 3.10 Scottish Land and Estates were concerned that the term ‘wildness’ was not defined.
- 3.11 NGOs and voluntary organisations were generally positive about the special qualities listed and the descriptions of the natural habitats and landscapes.



“We agree with these descriptions, and are particularly glad to see its mountains listed first... these provide the basis for most of the Park’s special habitats and landscapes, and almost all of its ‘wildness and space’.”

(North East Mountain Trust)

3.12 Several of the respondents expressing disagreement raised concerns about the language used in the descriptions. Private individuals felt that some of the phrases used were “emotive”, “romantic” and as a result “inaccurate”. There were recurring objections to the use of the phrases “mountain folk” and “forest folk”.

3.13 Some respondents noted the diversity of communities living in the Cairngorms and suggested that the descriptions overlooked this.

“The use of the terms "Mountain Folk" and "Forest Folk" while poetic and romantic is not particularly realistic or helpful. You could equally have said, probably with more justification, that the Park is a place of pensioners, youngsters and the working population, or indeed town, village folk, country folk, and visitors.”

(Aberdeenshire Council)

“The most significant effect of the mountains is not the geomorphology; the effect is making communications and linkages between communities difficult with a huge diversity in communities and cultures as a consequence.”

(Rothiemurchus Estate)

3.14 Some respondents including land owners/ managers and private individuals felt that the descriptions exaggerated the “uniqueness” of the park in relation to its habitats and species and also its prominence as a venue for particular sports.

“Mountains within the Cairngorms National Park are unique the same as mountains elsewhere will have unique features... The CNP area is not unique within the UK in containing activities relevant to its mountain and woodland habitat.”

(Alvie and Dalraddy Estates)

“The Cairngorms represent a very important element of the culture of Scottish mountaineering, but to claim a central position is to overlook the importance of Lochaber, Glencoe and Skye, which does not strengthen the case being made... Authors have sometimes got a bit carried away with enthusiasm [on ‘Landscape qualities’].”

(Private individual)

3.15 The Cairngorms Campaign and the Scottish Wild Land Group felt that it was unnecessary to replace the detailed descriptions given in the previous (2007) Park Plan and were concerned that the section was too summarised.



“..the briefer and more general the description of a quality is, the easier it is to ignore it and the more difficult it is to point out that a proposal may damage it.”

(The Cairngorms Campaign/ The Scottish Wild Land Group)

Question 3: Are there other special qualities you think should be explicitly identified in the National Park Plan?

Type	Yes	No	Neither/ Both	No Response
Private individuals	4	3	0	26
NGOs/ voluntary organisations	5	2	3	4
Other public bodies	1	0	0	12
Land owners/ managers	2	0	1	5
Community organisations	1	1	0	6
Other private businesses and business interests	0	0	0	7
Local authorities	1	0	0	2
Total	14	6	4	62
Percentage	17%	7%	5%	75%
Percentage of those responding	58%	25%	17%	

3.16 Over a quarter of respondents (24) answered this question. While a quarter of those responding (6 – 29%) felt that the Park Plan adequately covered the special qualities, nearly two-fifths (14 – 58%) felt that other elements should be explicitly identified. Four respondents (17%) gave comments that did not directly answer the question.

3.17 The most frequent comment was that there should be more emphasis on the people who live and work in the Park

“We believe that the individual communities (as people rather than buildings or landscape) should also be identified in the Plan as they are a vital part of the Cairngorms National Park.”

(Blair Atholl & Struan Community Council)

“The Plan as it stands is too light on people related issues. While it emphasises volunteering in relation to Outcome one it does not give any substance to how community engagement will be affected.”

(Action of Churches Together in Scotland (ACTS))

3.18 Some respondents felt that the Plan should emphasise the remoteness of some areas of the Park.

“..qualities of remoteness are not given sufficient emphasis.”

(Ramblers Scotland)



“We would like “remoteness” (of areas, not settlements) to be given higher priority in the document as a whole; while “the long walk in” concept has its critics, there is no doubt that physical remoteness brings its own mental and physical health benefits, as well as biophysical ones such as low disturbance levels to soils and wildlife.”

(North East Mountain Trust)

- 3.19 A couple of respondents felt that the quality of the views in the Park should be highlighted and one individual commented on the “visual and sensory qualities” including the quality of the air. NGOs argued that there should be a wider description of woodlands and also wetlands in the Park.

“The woodland focus is on pine and birch at a landscape scale. This should be broadened to include other woodland types, such as riparian woodlands and aspen rich woodlands.”

(Scottish Native Woodlands)

- 3.20 One landowner/ manager felt that the Plan should comment on the area’s “long history of mostly careful management and sensitive development based on long term planning and investment”

(Rothiemurchus Estate)

Question 4: Do you think the long-term outcomes should be updated and condensed? If so, how?

Table 3.3: Responses to Q.4 by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	5	4	2	22
NGOs/ voluntary organisations	5	4	1	4
Other public bodies	3	2	0	8
Land owners/ managers	4	2	0	2
Community organisations	0	1	1	6
Other private businesses and business interests	2	0	1	4
Local authorities	2	0	0	1
Total	21	13	5	47
Percentage	25%	16%	6%	57%
Percentage of those responding	54%	33%	13%	

- 3.21 Nearly two-fifths of respondents (21 – 58%) felt that the long-term outcomes should be updated and/or condensed. One third (13 – 33%) felt that the long-term outcomes should not be significantly amended. Thirteen per cent did not directly comment on whether the long-term outcomes should be updated or condensed.

- 3.22 A number of respondents found this section of the Plan confusing and some organisations commented on the three ‘strategic outcomes’ rather than the 23 long-term outcomes. There was further confusion about how these related to the 10 five-year outcomes in the next section. For example, the North East Mountain Trust and Aberdeenshire Council both said that they welcomed the reduction of outcomes from 23 to 10 for 2012-17 not recognising that they

cover distinct timescales. The John Muir Trust suggested rewording the section (including summary paragraphs) to provide greater clarity on what the long-term outcomes aim to achieve.

- 3.23 Of those supporting amending the 23 outcomes, several felt that there were too many and that they covered too many themes to be helpful. Some respondents made detailed suggestions about where the outcomes could be combined.

“..the previous list was too long, and it attempted to serve too many different themes, for some of which the Park does not have either the resources or any statutory engagement.”

(ScotWays)

- 3.24 Two public bodies (Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA)) felt that the outcomes need to be updated to reflect developments in national policy, particularly on climate change and other environmental planning issues.

“We recommend updating them to better address recent national priorities such as mitigating and adapting to climate change; delivering an ecosystems approach; natural approaches to flood management; using green spaces including paths to deliver health, wellbeing, and attractive places to live, visit & do business; protecting peat and carbon rich soils.”

(SNH)

- 3.25 Scottish Enterprise felt that the outcomes needed updating to take more account of the challenges articulated elsewhere in the Park Plan and they felt that the outcomes *“could be more explicitly related to demonstration of success”*.

- 3.26 Other organisations such as the Woodland Trust Scotland and Scotia Homes suggested specific outcomes that they would like to see reviewed or given greater priority in the Plan. Edinglassie Estate felt that *“there should be a comprehensive review of the long term outcomes as part of the 5 year Plan process”* and that this should consider how compatible the outcomes are with each other and whether there is any conflict with the aims for Scottish National Parks set out in the 2000 Act.

- 3.27 Of those that disagreed with amending the long-term outcomes, several argued that the outcomes remain relevant and continue to meet the needs of the Park.

“..the Trust believes that, despite the introduction of new strategies, policies and guidance at national, regional and local levels, the original outcomes remain relevant and cover the essential elements the Cairngorms National Park should be concerned with over the period 2012 to 2017, and beyond.”

(John Muir Trust)



“FCS believes that the long-term outcomes meet the diverse needs of the National Park well.”

(Forestry Commission Scotland)

3.28 Other respondents, including NGOs/voluntary organisations and landowners/managers, felt that condensing the outcomes could potentially ‘dilute’ their importance and there was concern that valuable information would be lost. One organisation, SCNP, felt that the outcomes should be expanded to provide a strong framework and support informed decision-making.

Question 5: Do you agree the set of 10 outcomes provides the right focus for the next five years? If not, what else is more important?

Type	Yes	No	Neither/Both	No Response
Private individuals	5	6	1	21
NGOs/ voluntary organisations	3	3	4	4
Other public bodies	4	2	1	6
Land owners/ managers	1	3	0	4
Community organisations	1	1	1	5
Other private businesses and business interests	3	2	0	2
Local authorities	1	1	0	1
Total	18	18	7	43
Percentage	22%	22%	8%	52%
Percentage of those responding	42%	42%	16%	

3.29 There was a mixed response to this question with similar proportions of those responding agreeing (18 – 42%) and disagreeing (18 – 42%) that the 10 five-year outcomes provide the right focus – although a higher proportion disagreed.

3.30 Although some positive responses were caveated, most of those that agreed felt that the outcomes set the right tone and sufficiently covered key issues.

“They appear to cover the key areas of development, and are both generic and specific enough to allow both traditional and innovative approaches to be adopted and promoted.”

(John Muir Trust)

“FCS believes that the outcomes are well articulated and provide the necessary focus.”

(Forestry Commission Scotland)

3.31 However, some of those that disagreed (including community organisations and landowners) felt that the outcomes were too generic and could provide more detail on what is intended.



- 3.32 Several respondents from across respondent groups felt that the outcomes should say more on economic sustainability in the Cairngorms despite the economy being referred to at Outcome 6.

“...the aims focus too much on the special qualities/wildlife issues and are insufficiently balanced with the importance of maintaining the social and economic viability of communities within the Park.”

(Boat the Garten and Vicinity Community Council)

“We do not consider that the focus for 2012 – 2017 entirely covers the outcomes that are required to improve the economic prospects within the Park. One additional outcome should be to increase tourism and housing opportunities by embracing new development that fits the aims of the Plan.”

(Rodger Builders)

- 3.33 Alvie and Dalraddy Estates felt that there should be more emphasis on increasing productivity and encouraging the Cairngorms to be more “self sufficient and sustainable”. Aberdeenshire Council felt that the outcomes should specifically address the development of renewable energy facilities in and around the Park.

- 3.34 Some NGOs/ voluntary organisations felt that the outcomes should be more explicit on sensitive development. While The Cairngorms Campaign / The Scottish Wild Land Group suggested an additional outcome, SCNP felt that Outcome Seven should be reworded and that there should be a requirement for more “scientifically based decision making” on land use and development.

- 3.35 Other respondents felt that there should be greater emphasis on the provision of affordable housing.

“The issue of affordable housing has not been addressed at all adequately and remains a matter of increasing importance.”

(Private individual)

- 3.36 SNH felt that there should be greater emphasis on “*climate change adaptation, particularly work to enhance the resilience of habitats, species and land use to climate change*”. The Scottish Wildlife Trust argued that the outcomes should include a focus on enhancing the biodiversity and landscape “*at a Park scale*”.

- 3.37 There was some discussion around how the five-year outcomes relate to national priorities. Rothiemurchus Estate felt that the list should be condensed into a single CNPA outcome. They argued that there are sufficient national policies in place (including Planning Advice Notes) and suggested that the outcomes are duplication and add to bureaucracy. However, Scottish Enterprise felt that there should be clearer links between the outcomes and national objectives.



“There is an opportunity for the Park to demonstrate more explicitly its contribution at a national level to other Scottish Government priorities which are major drivers of partners’ activities and resource allocation, e.g. within Government Economic Strategy and the priority of ‘Sustainable Tourism’”.

(Scottish Enterprise)

3.38 Other respondents suggested merging outcomes (for example, Woodland Trust Scotland felt that outcomes 2 and 3 would be delivered by the same actions) and Visit Scotland felt that it would be helpful if the outcomes were given priority rankings.

Question 6: Which are the most important outcomes?

Outcome highlighted	1	2	3	4	5	6	7	8	9	10	Other
Private individuals	2	5	5	5	0	1	3	1	0	1	2
NGOs/ voluntary organisations	3	5	3	7	3	0	5	1	1	3	0
Other public bodies	1	3	3	2	1	0	1	1	0	1	0
Land owners/ managers	0	1	1	0	1	4	3	3	2	1	2
Community organisations	0	0	0	0	0	2	1	0	2	1	0
Other private businesses and business interests	1	0	1	1	1	2	2	1	0	1	0
Local authorities	1	1	1	1	1	1	1	1	1	1	0
Total	8	15	14	16	7	10	16	8	6	9	4
Percentage	7%	13%	12%	14%	6%	9%	14%	7%	5%	8%	4%

3.39 This question asked consultees which of the ten outcomes were most important to them. Thirty-four consultation respondents gave an answer to this question with some highlighting only one outcome and one respondent stating that all were equally important.

3.40 Table 3.5 shows that across all respondent groups the outcomes that were considered the most important were 2, 3, 4 and 7 each with 12 to 14 per cent of comments. Clearest concern for these four outcomes came from private individuals. Generally, these were viewed as the outcomes that sought to protect the Park’s environment.

“The most important outcomes are: Outcome 2, Outcome 3, Outcome 4 and Outcome 7. These relate to the value of the natural and cultural heritage and the imperative of conserving and enhancing it.”

(Private individual)



“..the most urgent attention needs to be given to outcomes 2, 3, 4 and 7, concerning the quality and connectivity of habitats, the conservation of important species, the qualities of wildness and the quality, location and size of new built development respectively.”

(The Cairngorms Campaign/ The Scottish Wild Land Group)

3.41 NGOs and voluntary organisations also focused on outcomes 1, 5 and 10 which cover awareness and conservation (1), advice and support for land managers (5) and benefits from recreational activities.

3.42 Land owners/ managers also highlighted outcome 6 which focuses on economic growth and diversification as being important. Alvie and Dalraddy Estates augmented this and said:

“The most important outcome is to develop a more sustainable, self sufficient and resilient rural economy.”

(Alvie and Dalraddy Estates)

3.43 Outcomes 7 and 8, which cover settlements retaining their distinct sense of place and the transition to a low carbon economy, were also considered important by land owners/ managers.

Five-year Outcome 1: More people will learn about, enjoy and help to conserve and enhance the special natural and cultural qualities of the Park.

Question 7A: Do you agree that five-year outcome 1 is an appropriate one for this National Park Plan to 2017?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	4	0	2	27
NGOs/ voluntary organisations	7	0	1	6
Other public bodies	2	0	0	11
Land owners/ managers	0	2	0	6
Community organisations	3	0	0	5
Other private businesses and business interests	2	0	0	5
Local authorities	1	0	0	2
Total	19	2	3	62
Percentage	23%	2%	4%	75%
Percentage of those responding	79%	8%	13%	

3.44 Over a quarter of the consultation respondents (24 – 28%) answered this question which asked whether outcome one was appropriate for the National Park Plan. Of those that did answer this question, 79 per cent (19) broadly felt it was appropriate. Only eight per cent of those who answered (2) said the outcome was not appropriate or needed to be changed. A further 13 per cent (3) commented but did not clearly agree or disagree.



3.45 The main concern raised was that outcome one focused mainly on people from outside the area visiting the park, and increasing their numbers. This was an issue for several respondents. There was some concern that increased visitor numbers could have a detrimental impact on the Park.

“We need to be aware of the dangers of attracting more visitors to an area that includes among its attributes seclusion, wildlife and a wilderness experience. For those that reside in this area or visit we agree that we should endeavor to improve their enjoyment and understanding of the area”

(Alvie and Dalraddy Estates)

3.46 Others, such as the RSPB, felt that the outcome did not sufficiently focus on local communities.

“Whilst local people are mentioned in this section, it does seem more targeted towards visitors where we see both audiences as important.”

(RSPB)

3.47 Some suggested that it should be reworded to take account of these concerns.

“[This is] an appropriate outcome, but this outcome should be reworded to ensure that it does not simply imply that more people are to be encouraged to visit the Park.”

(Badenoch and Strathspey Conservation Group)

3.48 However, one respondent emphasised the opportunity to attract more people to the Park:

“The more people who appreciate the Park, the bigger lobby support it and so we agree that this is an important outcome.”

(North East Mountain Trust)

Question 7B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	5	0	0	28
NGOs/ voluntary organisations	3	0	1	10
Other public bodies	1	1	1	10
Land owners/ managers	0	0	1	7
Community organisations	2	0	0	6
Other private businesses and business interests	2	0	0	5
Local authorities	1	0	0	2
Total	14	1	3	68
Percentage	17%	1%	4%	82%
Percentage of those responding	78%	6%	17%	



- 3.49 Just over one fifth of consultation respondents (18 – 21%) answered this question which asked whether they agreed with the packages of work. Of those who did, 78 percent (14) broadly agreed with the work packages or made positive comments about the work packages. Only one respondent indicated they did not agree or that the work packages needed to be changed. Seventeen per cent (3) of the respondents who commented on this area made other comments.
- 3.50 Respondents provided few additional comments on why they did or did not feel that the work packages would deliver the outcome. A few respondents said the work packages would “possibly” deliver the outcome or “contribute” to it. Scottish Natural Heritage felt that the proposed package of work would be insufficient. However, Aberdeenshire Council said:

“It is recognised that the packages of work represent a fair spread given likely limited resources.”

(Aberdeenshire Council)

- 3.51 A few respondents reinforced the importance of the Cairngorms Rothiemurchus and Glenmore Group Strategy. One private individual asked for a work package to target adults living in the Park.

Question 7C: Are there better packages of work that would deliver the outcome?

- 3.52 Sixteen per cent of consultation respondents (14) answered this question which asked for better packages of work that would deliver the outcome. Some of the comments made by respondents in response to question b are also relevant to question c and are outlined here.
- 3.53 There was strong support for marketing the Park more effectively and supporting learning and interpretation.

“There would also need to be further effort at developing, promoting and monitoring responsible recreational behaviour; and increasing understanding of what that means for different activities in the main types of recreational settings in the Park.”

(Scottish Natural Heritage)

- 3.54 Specific suggestions included:
- A few respondents emphasised the need to ensure materials were improved, and of a good quality.
 - As well as improving marketing and educational activities, Scottish Natural Heritage suggested that a further package of work should be added to develop ways of making it easier for visitors to donate.
 - Respondents suggested a range of activities for people to learn about, interpret and access the Park. These included talks, films, digital downloads and working with teachers to build their skills and confidence to teach outdoors.

3.55 Several respondents highlighted the role that particular groups could play in the development and delivery of work packages, suggesting that the draft Plan highlight these. Suggestions included that:

- there are opportunities to work more with local groups and organisations to deliver promotional activities;
- ranger services are key delivery partners, but may need to be strengthened; and
- Glenmore Lodge may have an important role.

3.56 Individual respondents also suggested:

- learning from adventure centres in other countries;
- developing a better understanding of the impact of different visitor types, and taking a more selective approach to tourism; and
- recognising the importance of land management techniques.

Question 7D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money.

3.57 Sixteen per cent of consultation respondents (14) answered this question which asked what they could do to deliver the outcome.

3.58 Respondents made a number of different suggestions:

- A few respondents, including a community organisation and a voluntary organisation, offered support and coordination;
- A local authority highlighted existing tourism and business support and a potential cultural heritage programme;
- An NGO drew attention to existing resources;
- An NGO offered to act as a coordinating body for climbing and walking clubs; and
- Three private individuals emphasised the opportunity for people to contribute as volunteers.

Question 7E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	1	3	1	28
NGOs/ voluntary organisations	2	0	1	11
Other public bodies	0	0	1	12
Land owners/ managers	0	1	0	7
Community organisations	1	1	0	6
Other private businesses and business interests	1	0	0	6
Local authorities	0	1	0	2
Total	5	6	3	72
Percentage	6%	7%	3%	84%
Percentage of those responding	36%	43%	21%	

- 3.59 Only sixteen per cent (14) of the respondents answered this question which asked whether they agreed with the indicators and targets suggested for this outcome. Of those that did, 36 per cent (5) broadly agreed. Forty-three per cent (6) said they disagreed or suggested that the indicators and targets need to be changed. A further 21 per cent (3) commented but did not clearly agree or disagree.
- 3.60 A few respondents highlighted the difficulties in measuring the financial contribution of visitors, or asked for clarity about what was meant by this. This included a local authority, who agreed it is important to understand “visitor payback”, particularly in the current economic climate.
- 3.61 A voluntary organisation commented that the targets are ambitious.

Question 7F: Can you tell us about better indicators or more appropriate targets?

- 3.62 Only six per cent (5) of the respondents to the consultation specified better indicators or more appropriate targets. Some comments made in relation to question E are relevant to this and are outlined here.
- 3.63 Several respondents were concerned that the indicators and targets focused on measuring the delivery of work packages, rather than the difference made or the impact.

“The targets are only about numbers and not about ‘quality’. 100% increase does not indicate any satisfaction or if it was worth it.”

(Aviemore and Vicinity Community Council)

- 3.64 These respondents suggested more outcome focused indicators such as:
- improved visitor satisfaction (gathered using a customer survey);
 - the number of people leaving with a better understanding;
 - the number of visitors to the Park;
 - those used in the SNH environmental indicators framework; and
 - information which would allow the Park to compare itself with other attractions.
- 3.65 Several respondents, including a local authority and a public body, felt that baseline information and actual numbers should be provided in the targets, rather than simply including percentage change targets.

Question 7G: Can you provide data for better indicators?

- 3.66 Only one respondent, a private individual, answered this question which asked whether they could provide data for better indicators. The respondent suggested that Cairngorm Mountain Limited could provide data about the number of people involved in activities.

Five-year Outcome 2: The quality and connectivity of habitats will be improved, enhancing the landscape at a Park scale

Question 8A: Do you agree that five-year outcome 2 is an appropriate one for this National Park Plan to 2017?

Table 3.9: Responses to Q.8A by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	4	1	1	27
NGOs/ voluntary organisations	8	1	0	5
Other public bodies	3	0	0	10
Land owners/ managers	0	2	1	5
Community organisations	1	2	0	5
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	18	6	2	60
Percentage	21%	7%	2%	72%
Percentage of those responding	69%	23%	8%	

3.67 Under a third of consultation respondents (26 – 30%) answered this question which asked whether outcome two was appropriate for the Park Plan. Of those that did answer, 69 per cent (18) broadly agreed the outcome was appropriate. Twenty-three per cent (6) said the outcome was not appropriate or needed to be changed. A further eight per cent (2) commented but did not clearly agree or disagree.

3.68 Several respondents expressed broad support for the emphasis placed on wild land (particularly native woodland and wetland) within this section of the Plan.

“The prominence given in this section to native woodland and wetland restoration is most welcome to RSPB Scotland given our long history of working on these issues.”

(RSPB Scotland)

3.69 There was some concern that particular habitats had not been included, and that these may be neglected as result.

“The National Park is important for all its habitats. We feel that the mistake that is continually made is that of concentrating on one or two species or habitats to the detriment of others.”

(Aviemore and Vicinity Community Council)

3.70 Respondents called for additional habitats to be a priority for the Plan. These included:

- species rich grassland;
- moorland; and
- upland habitats, including arctic alpine habitats.



- 3.71 There was some concern that this outcome emphasised connectivity and expansion at the expense of managing existing habitats. SNH emphasised the need to expand the outcome to cover habitat diversity, in order to improve resilience. On a similar theme, the Woodland Trust for Scotland suggested the benefits should include greater biodiversity and ecological adaptation.
- 3.72 In addition, a cautious and considered approach to expansion was proposed because of the potential impact on other habitats.
- 3.73 Two land managers suggested that the comparative productive capacity and carbon storage capacity of particular woodlands (particularly non-native woodlands) should be considered in the Park Plan.

“While recognising the habitat and landscape benefits of native woodland, the requirement to provide for ‘increased carbon storage in woodland’ is better served by productive conifer plantations which ultimately produce material which can be utilized, thus locking carbon into products and structures.”

(Seafield and Strathspey Estates)

Question 8B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Table 3.10: Responses to Q.8B by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	2	1	0	30
NGOs/ voluntary organisations	1	1	1	11
Other public bodies	1	2	1	9
Land owners/ managers	0	0	1	7
Community organisations	1	0	1	6
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	7	4	4	71
Percentage	8%	5%	5%	83%
Percentage of those responding	47%	27%	27%	

- 3.74 Seventeen per cent of consultation respondents (15) answered this question which asked whether they agreed that the proposed packages of work identified would deliver outcome two. Of those who did answer, 47 per cent (7) broadly agreed. Twenty-seven per cent (4) broadly disagreed or said the work packages needed to be changed. A further 27 per cent commented but did not clearly agree or disagree.
- 3.75 Some questioned the need to increase native woodland. Alvie and Dalraddy Estates suggested that increasing the area of native woodland would not help improve productivity or contribute to the local economy in the way that non-native woodland might. This was reinforced by the Forestry Commission, who suggested that it would be helpful to avoid undue emphasis on only native species.

“Well designed multi-purpose woodland using traditional conifer forestry (larch/ Spruce/ Fir/ Pine) as well as Scots pine and broadleaves can also deliver this outcome as well as many other benefits.”

(Forestry Commission Scotland)

3.76 SNH suggested that particular types of woodland, areas or projects should be prioritised in the work packages to deliver outcome two, and clear actions identified. They encouraged the Plan to make links to work outside the Park and highlighted the need to deliver actions already identified by the Catchment Partnerships - rather than focusing on further development.

3.77 While Alvie and Dalraddy Estates supported the use of fencing as an “essential management tool” the Cairngorms Campaign and the Scottish Wild Land Group asked for a presumption in favour of natural regeneration without the use of fencing.

Question 8C: Are there any better packages of work that would deliver the outcome?

3.78 Ten per cent of consultation respondents (9) answered this question which asked for better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are also outlined here.

3.79 A few respondents, including the Woodland Trust for Scotland, called for a programme to identify and restore Plantations on Ancient Woodland Sites (PAWS). These were seen as being important, and under threat of further loss.

“We think they should include a commitment for all PAWS in the area to be under a process of restoration and protection of semi-natural and high value habitats for conservation.”

(Woodland Trust Scotland)

3.80 Some respondents highlighted particular habitats that should be emphasised or which may need additional work packages developed. For example, the Mountaineering Council for Scotland called for work to address the specific challenges of upland habitats and SNH asked for a greater emphasis on the management of blanket bogs.

3.81 Other suggestions for additional or better packages of work included:

- using Local Biodiversity Action Plans to deliver Park Plan priorities;
- targeting native woodland creation close to where people live;
- riparian woodland management; and
- the work of SNH to bring designated sites into favourable condition.



Question 8D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money.

3.82 Twelve per cent of consultation respondents (10) answered question d which asked what they could do to deliver the outcome.

3.83 Respondents made a number of different suggestions. These included:

- two NGOs offered to help coordinate volunteers;
- a community organisation offered leadership, co-ordination, skills and advice;
- a local authority offered continued support to deliver the Local Biodiversity Action Plan and other partnership work;
- another NGO offered access to data to identify areas for expansion;
- other NGOs offered support on specific projects or access appropriate funding; and
- a public body said it would work with land managers to bring features on designated sites into favourable condition.

Question 8E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	No	Neither/ Both	No Response
Private individuals	1	2	0	30
NGOs/ voluntary organisations	2	3	1	8
Other public bodies	1	2	0	10
Land owners/ managers	0	2	1	5
Community organisations	0	1	0	7
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	6	10	2	68
Percentage	7%	12%	2%	79%
Percentage of those responding	33%	56%	11%	

3.84 Twenty-one per cent of consultation respondents (18) answered this question which asked whether they agreed with the indicators and targets suggested. Of those that did answer this question, 55 per cent (10) broadly disagreed with the targets and indicators or said they needed to be changed. One third (6) broadly agreed. A further 11 per cent (2) commented but did not clearly agree or disagree.

3.85 A few respondents questioned the usefulness and meaningfulness of these indicators and targets. In particular, they were concerned about measuring the total area of particular land use as it is not an indication of good management, quality or connectivity.

“Simply measuring the overall increase in area of woodland (if found) would give no indication of qualitative changes and no indication of – indeed would hide – losses of established woodlands.”

(The Cairngorms Campaign and the Scottish Wild Land Group)

- 3.86 A range of respondents were concerned that the indicators were too simplistic. For example, Aberdeenshire Council felt that focusing on these targets may have a negative impact on other habitats not mentioned.

“There is a need to take care that these targets do not have a negative impact on other important habitats such as species rich grassland.”

(Aberdeenshire Council)

- 3.87 Several respondents suggested the targets for woodland expansion were unambitious, given indicative figures.
- 3.88 SEPA were uncertain that the target to increase active flood plain by five per cent over five years was achievable and suggested better links to the River Basin Plan.

Question 8F: Can you tell us about better indicators or more appropriate targets?

- 3.89 Only eight per cent of consultation respondents (7) answered this question which asked for better indicators or more appropriate targets. Some comments made in relation to question E are relevant and have been outlined here.

- 3.90 The main points were:

- A few respondents suggested specific indicators and targets should be developed for habitats other than woodland (including wetland and upland habitats) and specific types of woodland (such as pinewoods, riparian woods, montane woods and productive woods).
- A few respondents suggested that there should be targets relating to the delivery of specific projects within the work packages.
- Two respondents suggested doubling the target for the area of woodland, as they considered the existing target under ambitious.

- 3.91 Other individual suggestions included:

- An indicator for water quality.
- An indicator to measure increase in natural tree and scrub regeneration.
- An indicator for upland habitat – such as the proportion of upland routes surveyed by COAT that are “fit for purpose”.
- An indicator relating to the successful proportion of existing habitat brought into appropriate management.
- Targets beyond five years.

- 3.92 SNH suggested using existing methods of assessing woodland connectivity in the Park area.



Question 8G: Can you provide data for better indicators?

3.93 Only three per cent of consultation respondents (3) answered this question which asked whether they could provide data for better indicators.

3.94 Suggestions included:

- one local authority offered baseline data on particular projects; and
- an NGO suggested that the Forestry Commission could provide data on where native woodland currently exists.

Five-year Outcome 3: The species for which the Cairngorms National Park is most important will be in better conservation status in the Park

Question 9A: Do you agree that five-year outcome 3 is an appropriate one for this National Park Plan to 2017?

Type	Yes	No	Neither/ Both	No Response
Private individuals	4	1	2	26
NGOs/ voluntary organisations	4	1	1	8
Other public bodies	4	0	0	9
Land owners/ managers	1	1	0	6
Community organisations	2	1	0	5
Other private businesses and business interests	2	0	0	5
Local authorities	1	0	0	2
Total	18	4	3	61
Percentage	21%	5%	3%	71%
Percentage of those responding	72%	16%	12%	

3.95 Over a quarter of consultation respondents (25 – 29%) answered this question which asked whether outcome three was appropriate for the Park Plan. Of those that did answer, 72 per cent (18) broadly agreed this was an appropriate outcome. Sixteen per cent (4) said the outcome was not appropriate or needed to be changed. A further 12 per cent (3) commented but did not clearly agree or disagree.

3.96 Few respondents offered further comments on why they agreed or disagreed. But, there were different views on the need to target specific species, and which species these should be. The RSPB and the Cairngorms Campaign and the Scottish Wild Land Group called for more detail on which species would be targeted. However, the Woodland Trust and a private individual disagreed with the outcome's focus on particular species and proposed it should be replaced.

“No. We think this should be measured as a habitat improvement and enhancement objective rather than the species which will be the beneficiaries.”

(The Woodland Trust for Scotland)



3.97 Aberdeenshire Council recognised the diversity of opinion on this issue:

“The Park Authority has to appreciate that there will be many differing views as to what the priority species for the Park will be.”

(Aberdeenshire Council)

Question 9B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Type	Yes	No	Neither/ Both	No Response
Private individuals	2	1	2	28
NGOs/ voluntary organisations	1	1	1	11
Other public bodies	0	0	3	10
Land owners/ managers	0	0	1	7
Community organisations	1	0	1	6
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	6	2	8	70
Percentage	7%	2%	9%	81%
Percentage of those responding	38%	13%	50%	

3.98 Nineteen per cent of consultation respondents (16) answered this question which asked whether they agreed that the packages of work would deliver outcome three. Of those who did answer, 38 per cent (6) broadly agreed, 13 per cent (2) broadly disagreed or said the work packages needed to be changed. A further 50 per cent (8) commented but did not clearly agree or disagree.

3.99 Respondents emphasised the need to develop the work packages further, with others and across boundaries.

3.100 SNH suggested that further packages of work would be needed to develop innovative solutions for managing recreational behaviour, and promoting responsible behaviour, in sensitive sites. They said there was a need for work to engage land owners and managers not participating in wildlife estates. Sportscotland strongly supported the need to improve understanding. A private individual reinforced the importance of improving understanding and awareness among estate staff.

3.101 Edinglassie Estate emphasised the importance of updating the local biodiversity plan, with input from a full range of stakeholders.

Question 9C: Are there any better packages of work that would deliver the outcome?

3.102 Ten per cent of consultation respondents (9) answered this question which asked for better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are also outlined here.



3.103 Specific suggestions included:

- The production of a habitat network to prioritise habitat creation.
- The re-introduction of particular species to generate pride.
- The National Park Authority could join the Partnership for Action Against Wildlife Crime.
- Increased monitoring and recording to identify species distribution.
- Awareness raising to reduce the impact of recreation.
- Linking the work to Rural Priorities and successor schemes.

Question 9D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money.

3.104 Nine per cent of consultation respondents (8) answered this question which asked what they could do to deliver outcome three.

3.105 Respondents made a number of different suggestions. These included:

- a community organisation offered skills and advice;
- a local authority offered continued support through the LBAP;
- two NGOs offered support to provide or coordinate volunteer labour;
- one NGO offered to help provide advice to land managers;
- an NGO offered data on the location of accessible woodland; and
- a public body offered ongoing support and the opportunity to work with the organisations they fund to contribute to the outcome.

Question 9E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	No	Neither/ Both	No Response
Private individuals	2	1	0	30
NGOs/ voluntary organisations	0	3	0	11
Other public bodies	0	1	1	11
Land owners/ managers	0	0	2	6
Community organisations	1	1	0	6
Other private businesses and business interests	1	0	0	6
Local authorities	0	1	0	2
Total	4	7	3	72
Percentage	5%	8%	3%	84%
Percentage of those responding	29%	50%	21%	

3.106 Sixteen per cent of consultation respondents (14) answered this question which asked whether they agreed with the indicators and targets suggested. Of those who did answer, half (7 - 50%) broadly disagreed or said the targets or indicators needed to be changed. Over a quarter (4 – 29%) broadly agreed and a further fifths (3 – 21%) commented but did not clearly agree or disagree.

3.107 The most common concern was that the indicators and targets were not sufficient to measure progress towards outcome nine effectively. Respondents said they were unclear how the information would be gathered; and were concerned that the measures were not outcome focused or “SMART”.

“Something as important as this deserves good-quality SMART indicators and targets. The proposed indicators and targets are measuring inputs and not outcomes.”

(North East Mountain Trust)

“The indicators do not give any indication of how successful the ‘outcome’ is.”

(Aviemore and Vicinity Community Council)

3.108 SNH suggested that the target for uptake of the Wildlife Estates could be more ambitious. However, Edinglassie Estate highlighted that it is still in its pilot stage.

3.109 SEPA suggested the indicators, targets and data should link with the River Basin Management Plan.

Question 9F: Can you tell us about better indicators or more appropriate targets?

3.110 Only six per cent (5) of consultation respondents answered this question which asked for better indicators or more appropriate targets. Some comments made in relation to question E are relevant and have been outlined here.

3.111 Building on earlier points, a few respondents proposed indicators which focused on measuring whether particular species were doing better as a result of the work packages. These were seen as more meaningful measures of success.

3.112 Specific suggestions included measuring:

- the increase in habitats that the species rely on;
- the decrease in wildlife crime;
- the removal of invasive species;
- the increase in occupancy of golden eagles;
- the number of birds of prey involved in the raptor project found poisoned; and
- the prevalence of behaviours which negatively impact on this outcome (such as vehicles, fence removal and irresponsible muirburn).

3.113 A private individual highlighted the opportunity to use data gathered by the Forestry Commission, RSPB, SNH and other organisations to understand changes for species and habitats.

Question 9G: Can you provide data for better indicators?

3.114 Only one respondent, an NGO, answered this question which asked whether they could provide data for better indicators. They suggested the Forestry Commission as a good source of information.

Five-year Outcome 4: The qualities of wildness in the Park will be greater

Question 10A: Do you agree that five-year outcome 4 is an appropriate one for this National Park Plan to 2017?

Type	Yes	No	Neither/ Both	No Response
Private individuals	5	1	3	24
NGOs/ voluntary organisations	10	1	0	3
Other public bodies	2	0	2	9
Land owners/ managers	1	3	0	4
Community organisations	1	1	0	6
Other private businesses and business interests	1	0	1	5
Local authorities	0	1	0	2
Total	20	7	6	53
Percentage	23%	8%	7%	62%
Percentage of those responding	61%	21%	18%	

3.115 Nearly two-fifths of consultation respondents (33 – 38%) answered this question which asked whether outcome four was appropriate for the Park Plan. Of those that did answer, 61 per cent (20) broadly agreed the outcome was appropriate. Twenty-one per cent (7) said the outcome was not appropriate or needed to be changed. A further 18 per cent (6) commented but did not clearly agree or disagree.

3.116 Almost all NGOs broadly supported this outcome, because of its focus on wildness and the recognition in this section of the special qualities in the Park.

“The Trust welcomes the commitment made to protect the relative wildness of the National Park . . . Wild land is increasingly becoming recognised as an internationally important resource. The threat to wild land from inappropriate development is of significant concern to the Trust.”

(John Muir Trust)

“The Mountaineering Council of Scotland strongly agrees with the need for this outcome to conserve the special qualities of the Park. We welcome recognition that CNP wildness is affected both by a view from within the Park outwards, as well as a view of the Park from beyond the boundary and within the Park.”

(The Mountaineer Council of Scotland)



3.117 The most common concern about this outcome was the emphasis on enhancing or increasing wildness within the Park. Several respondents, including a local authority, an NGO, public body, land manager, and a private individual questioned how realistic this concept is - particularly while delivering the other outcomes set out in the Park Plan.

“The Council does not believe you can create wildness. The partners cannot deliver the other nine outcomes without having an impact on wildness.”

(Aberdeenshire Council)

“We support the inclusion of an outcome concerned with wildness, although we are not convinced that an increase in wildness is deliverable or required.”

(Scottish Natural Heritage)

3.118 While some respondents supported the use of the term “wildness”, a range of respondents felt it needed greater definition.

“We could not identify anywhere in the document a definition of ‘wildness’. It is likely to mean something different to different people.”

(Edinglassie Estate)

“A better approach to defining wildland and wildness is needed.”

(Badenoch and Strathspey Conservation Group)

3.119 Glenprosan Estates and a private individual reinforced their support for the CNPA’s approach to opposing wind farms in the National Park because of their threat to wildness. However, a private individual expressed an opposite view - they felt that the CNPA’s opposition to wind farms close to National Park is “totally and utterly wrong”, given the threat of global warming.

Question 10B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Type	Yes	No	Neither/ Both	No Response
Private individuals	2	2	2	27
NGOs/ voluntary organisations	1	4	1	8
Other public bodies	0	1	0	12
Land owners/ managers	0	0	0	8
Community organisations	1	0	1	6
Other private businesses and business interests	1	0	0	6
Local authorities	0	1	0	2
Total	5	8	4	69
Percentage	6%	9%	5%	80%
Percentage of those responding	29%	47%	24%	

3.120 About a fifth of consultation respondents (17 - 20%) answered this question. Of those who did answer, nearly one half (8 – 47%) broadly disagreed that the packages of work would deliver the five year outcome or said they needed to be changed. Over one quarter of those who responded to the question (5 – 29%) broadly agreed with the proposed packages of work. A further quarter commented but did not clearly agree or disagree. Although most NGOs agreed that outcome four was appropriate, they were most likely to disagree with the packages of work to deliver it.

3.121 The main criticism was that the work packages would be insufficient to deliver the outcome and associated targets– respondents felt they needed to be more extensive and ambitious.

“There is not enough in the work packages to ensure that the ambitious outcome of a 10% increase can be delivered . . . There is a notable mismatch between the objective to increase wildness, and the proposed packages of work which will mainly work to maintaining the existing resource.”

(Scottish Natural Heritage)

3.122 In particular, some questioned the emphasis on development within this section of the Plan and suggested that the Park Plan should more strongly oppose development.

“The packages of work fall far short of what is needed. . . . Development and wildness are two opposite ends of the spectrum. Two out of four proposed work packages talk about development.”

(North East Mountain Trust)

3.123 Several respondents were particularly critical of the statement on hill tracks, using it as an example of an area where the Park Authority needs to take a stronger approach.

“There is a need for the CNPA to be more pro-active in encouraging or requiring the removal of hill tracks and other undesirable developments, as well as preventing them, or not granting them planning permissions, in the first place. Specifically, it is insufficient that ‘land managers will all follow best practice guidance on the design and maintenance of hill tracks’ – this means ‘build hill tracks nicely’...”

(The Cairngorms Campaign and the Scottish Wild Land Group)

Question 10C: Are there any better packages of work that would deliver the outcome?

3.124 Ten per cent of consultation respondents (8) answered this question which asked for better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are also outlined here.



3.125 In general, respondents felt that the work packages needed to be strengthened.

3.126 Specific suggestions included:

- Removing features that presently degrade wildness.
- Stronger work packages which remove or reduce hill tracks.
- More policy and guidance on wind farms and other large scale development outside the Park.
- Work to manage deer populations and reduce fencing.
- Reducing housing development.
- Activities to manage people and their behaviour within the Park.
- Supplementary planning guidance integrated into the Local Development Plan.
- A commitment that all PAWS will be restored.

Question 10D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money.

3.127 Fewer than one in ten consultation respondents (7 – 8%) answered this question which asked what they could do to deliver the outcome.

3.128 Respondents made a number of different suggestions. These included:

- A community organisation offered skills and advice.
- A local authority highlighted their role in planning policy and assessment.
- An NGO highlighted their role in encouraging awareness and respect of wildness.
- Another NGO offered support to promote restoration of PAWS.
- A public body offered advice on strategic policy and the impact of specific proposals.

Question 10E: Do you agree with the indicators and targets suggested for this outcome?

3.129 One in ten consultation respondents (8 – 10%) answered this question which asked whether they agreed with the indicators and targeted suggested. Of those who did answer this question, 38 per cent (3) broadly agreed and 63 per cent (5) broadly disagreed.

3.130 In line with earlier comments about Outcome 4, the main concern was that that the target was ambitious, given the work packages proposed. A couple of respondents also suggested that “wildness” is too difficult to measure.

Question 10F: Can you tell us about better indicators or more appropriate targets?

3.131 Only 10 per cent of consultation respondents (9) answered this question which asked for better indicators or more appropriate targets.

3.132 Building on earlier comments, a few respondents suggested it was more appropriate to have a target which “maintained” wildness or prevented its reduction, rather than to try and increase it.

3.133 Specific suggestions included:

- An indicator relating to existing areas of high wildness value (to prevent loss of quality).
- Measuring the acreage of areas brought into different use (such as removal of non-native woodland).
- Using tourist and population numbers.
- Developing specific indicators relating to the delivery of the work packages.

Question 10G: Can you provide data for better indicators?

3.134 There were no responses to this question.

Five-year Outcome 5: There will be a better targeted programme of advice and support for land managers in the Park that delivers the National Park Plan

Question 11A: Do you agree that the five-year outcome 5 is an appropriate one for this National Park Plan to 2017?

Table 3.17: Responses to Q.11A by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	5	0	1	27
NGOs/ voluntary organisations	4	0	2	8
Other public bodies	1	1	0	11
Land owners/ managers	2	0	1	5
Community organisations	2	0	0	6
Other private businesses and business interests	2	0	0	5
Local authorities	1	0	0	2
Total	17	1	4	64
<i>Percentage</i>	<i>20%</i>	<i>1%</i>	<i>5%</i>	<i>74%</i>
<i>Percentage of those responding</i>	<i>77%</i>	<i>5%</i>	<i>18%</i>	

3.135 Just over a quarter of consultation respondents (22 – 26%) answered this question which asked whether outcome five was appropriate for the Park Plan. Of those who did answer, 77 per cent (17) broadly agreed the outcome was appropriate. Five per cent (1) said the outcome was not appropriate or needed to be changed. A further 18 per cent (4) made other comments on the outcome but did not clearly agree or disagree.

3.136 A few NGOs emphasised the important role of land management in delivering the other outcomes in the Plan, and therefore supported the emphasis on advice and support.

“The Trust welcomes the identification of opportunities to deliver targeted, focused programmes of advice and support for land managers in the Park. This can help to alleviate some conflicts of interest and provides a degree of transparency and confidence.”

(The John Muir Trust)

3.137 SNH suggested this outcome (which is actually a way of delivering the other outcomes) could be changed to a package of work.

3.138 Private individuals asked for a similar outcome for communities, individuals and businesses and suggested better recognition of farming in the Park Plan.

Question 11B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Table 3.18: Responses to Q.11B by Stakeholder Group				
Type	Yes	No	Neither/Both	No Response
Private individuals	1	0	2	30
NGOs/ voluntary organisations	1	1	0	12
Other public bodies	0	1	0	12
Land owners/ managers	0	0	0	8
Community organisations	2	0	0	6
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	6	2	2	76
Percentage	7%	2%	2%	88%
Percentage of those responding	60%	20%	20%	

3.139 Just over one in ten consultation respondents (10 – 12%) answered this question which asked if they agreed that the packages of work identified would deliver outcome five. Of those who did answer, just over half (6 – 60%) broadly agreed. Twenty per cent (2) broadly disagreed or said the work packages needed to be changed. A further 20 per cent (2) commented on the work packages but did not clearly agree or disagree.

3.140 SNH felt that there needed to be more focus on improving communication about wider public benefits among a range of stakeholders, including local communities.

3.141 The Woodland Trust felt that the approach relied too much on the status quo.

Question 11C: Are there any better packages of work that would deliver the outcome?

3.142 Six per cent of consultation respondents (5) answered this question which asked for better packages of work that would deliver the outcome. Some

comments made in relation to question B are relevant and are also outlined here.

3.143 Suggestions for additional or better packages of work included:

- New grants and more coordinated access to existing grants to engage with landowners and managers.
- An enhanced advisory service for those involved in forestry and agriculture.
- Better engagement with local communities.

3.144 Respondents also suggested:

- Working with stakeholders to agree what is required to achieve better coordinated delivery of advice.
- The Moorland Forum could coordinate some aspects of the work.
- Ensuring that grants are only provided to organisations which deliver positive results.

Question 11D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money.

3.145 Five per cent of consultation respondents (4) answered this question which asked what they could do to deliver the outcome.

3.146 Respondents made a number of different suggestions. These included:

- a land manager emphasised the need to engage with land managers and representative organisations further;
- an NGO offered support with woodland creation and PAWS restoration;
- a public body offered advice on public benefit priorities, support to deliver Scotland Rural Development Programme, and offered National Nature Reserves as locations for demonstrating management for nature conservation; and
- an NGO offered to be consulted on advice being considered for land managers.

Question 11E: Do you agree with the indicators and targets suggested for this outcome?

Table 3.19: Responses to Q.11E by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	1	1	0	31
NGOs/ voluntary organisations	0	1	0	13
Other public bodies	0	1	0	12
Land owners/ managers	0	0	0	8
Community organisations	2	0	0	6
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	5	3	0	78
<i>Percentage</i>	<i>6%</i>	<i>3%</i>	<i>0%</i>	<i>91%</i>
<i>Percentage of those responding</i>	<i>63%</i>	<i>38%</i>	<i>0%</i>	

3.147 Fewer than one in ten consultation respondents (8 - 9%) answered this question which asked whether they agreed with the indicators and targets suggested. Of those that did answer, 63 per cent (5) broadly agreed with the targets and indicators. Thirty-eight per cent (3) broadly disagreed or said the targets or indicators needed to be changed.

3.148 SNH felt the indicators and targets could be improved and suggested that the indicator for the number of land management units receiving rural priorities contracts should be modified (given that arrangements for supporting land managers are likely to change after 2013).

3.149 A private individual felt that the target for satisfaction for training and skills support should be 100 per cent.

Question 11F: Can you tell us about better indicators or more appropriate targets?

3.150 Only one consultation respondent, the Woodland Trust, suggested a better indicator. They suggested measuring habitat improvements (or other actions which result from the advice provided).

Question 11G: Can you provide data for better indicators?

3.151 Only one consultation respondent (1%), who also answered question F, answered this question which asked whether they could provide data for better indicators. They suggested that Forestry Commission data could be used to identify progress towards habitat improvements.

Five-year Outcome 6: The economy of the Park will have grown and diversified, drawing on the Park’s special qualities

Question 12A: Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Type	Yes	No	Neither/ Both	No Response
Private individuals	4	3	2	24
NGOs/ voluntary organisations	1	5	1	7
Other public bodies	2	1	1	9
Land owners/ managers	5	0	0	3
Community organisations	2	0	1	5
Other private businesses and business interests	4	0	1	2
Local authorities	2	0	0	1
Total	20	9	6	51
Percentage	23%	10%	7%	59%
Percentage of those responding	57%	26%	17%	

3.152 Two-fifths of consultation respondents (35 – 41%) answered this question which asked whether outcome six was appropriate for the Park Plan. Of those who did answer, 57 per cent (20) broadly agreed the outcome was appropriate. A further 26 per cent (9) said the outcome was not appropriate or needed to be changed. A further 17 per cent (6) commented on the outcome but did not clearly agree or disagree.

3.153 Most respondent groups were very supportive of this outcome, saying it was important to support the local economy. However, five out of seven of the NGOs that responded were not supportive of this outcome, with only one broadly agreeing it was appropriate.

“The FSB agrees with growth and diversification of the economy of the Park but in this economic downturn this will be a challenge and “survival” is the current property within the business sector.”

Federation of Small Businesses – Badenoch and Strathspey Branch

3.154 A few respondents who broadly disagreed did so because they felt it was unrealistic to try to grow and diversify the economy substantially, in the current economic circumstances.

“For the CNP to promote an outcome that refers to the previous CNP economy as ‘fragile’ and ‘with relatively low wage structures’ and looks forward to an economy that will have grown substantially, appears not only unrealistic, but insensitive to the difficulties faced elsewhere in Scotland.”

(The Cairngorms Campaign and the Scottish Wild Land Group)

3.155 The other main concern was that this outcome may conflict with other outcomes, or indirectly undermine the special character of the Park.



“We do not support this Outcome as presently worded. We believe that the wording needs to be tighter to ensure that business success is not measured across all businesses but reflects those businesses that add to rather than “drawing on” the character of the Park.”

(North East Mountain Trust)

3.156 In contrast, a range of other respondents called for the National Park Authority to support the development of the economy. In particular, respondents emphasised the need to:

- develop better evidence about customer needs;
- encourage greater supply of land for housing development;
- support the development of existing sectors within the Park (rather than focusing on new sectors); and
- further develop destination venues.

3.157 Individual respondents also suggested this section of the Park Plan could:

- be clearer about what is meant by “diversification” and which sectors might be further encouraged;
- be clearer about the statistical information about employability locally (which one respondent challenged); and
- develop specific outcomes relating to tourism, economic growth and infrastructure development.

Question 12B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Type	Yes	No	Neither/ Both	No Response
Private individuals	2	0	1	30
NGOs/ voluntary organisations	1	1	0	12
Other public bodies	0	0	2	11
Land owners/ managers	0	2	3	3
Community organisations	0	0	2	6
Other private businesses and business interests	2	0	0	5
Local authorities	2	0	0	1
Total	7	3	8	68
Percentage	8%	3%	9%	79%
Percentage of those responding	39%	17%	44%	

3.158 One in five consultation respondents (18 – 21%) answered this question which asked if they agreed that the packages of work identified would deliver outcome six. Of those who did answer, 39 per cent (7) broadly agreed, 17 per cent (3) broadly disagreed, and 44 per cent (8) commented but did not clearly agree or disagree.

3.159 Several respondents felt there needed to be greater detail within the work packages, particularly the work package 4 (which relates to infrastructure), which could have significant resource implications.

“There would be benefit in more detail being provided around the nature, delivery, timescales, costs and benefits of the work packages. For example, high speed broadband and transport connectivity represent potentially significant physical development investment.”

(Scottish Enterprise)

3.160 A few respondents, including community organisations and land owners, were supportive of work to improve access to housing. Some called for further detail about what would be done to progress this.

“We support the recognition that if business development is to increase in the next five years, that suitable housing for workers must be in place to support this economic development.”

(Dunachton Estate and The Crown Estate)

3.161 Two land owners felt the work packages should focus more on supporting and strengthening existing land based industries in the Park.

“It is disappointing the draft Plan makes no specific references to growing and developing the farming, forestry and sporting industries. . . The Plan should be identifying work that will be carried out to assess how landed business can expand and their potential be maximized.”

(Edinglassie Estate)

3.162 On the other hand, SNH felt there should be a stronger emphasis on the special qualities of the park within the work packages.

“We suggest considering whether more action is needed on the special qualities aspect of this outcome.”

(SNH)

Question 12C: Are there any better packages of work that would deliver the outcome?

3.163 Ten per cent of consultation respondents (9) answered this question which asked for better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are also outlined here.

3.164 Specific suggestions included:

- Work packages to manage the built environment or greenspaces.
- Trialing approaches to manage recreation in sensitive environments.
- Learning from existing businesses within the Park.
- Work to maintain local services.
- Activities to reduce the barriers to private sector investment.
- Using the Scottish Rural Development Programme as a funding source.
- Support for specific types of business to access credit and funding.



Question 12D: What can you/ your organisation do to deliver the outcome? E.g provide leadership and co-ordination, provide skills and advice, provide money?

3.165 Seven per cent of consultation respondents (6) answered this question which asked what they could do to deliver the outcome.

3.166 Respondents made a number of different suggestions. These included:

- a local authority suggested that the Council, RSLs and housing trusts play a key role;
- a local authority highlighted its business advice and planning roles;
- a housing developer offered to contribute, providing finance;
- a public body offered strategic policy and guidance on the Sustainable Tourism strategy, and help to support business development;
- another public body emphasised its role in engaging with businesses; and
- a private individual offered support and advice.

Question 12E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	No	Neither/ Both	No Response
Private individuals	1	1	1	30
NGOs/ voluntary organisations	0	1	0	13
Other public bodies	0	1	1	11
Land owners/ managers	0	0	0	8
Community organisations	0	1	0	7
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	3	4	2	77
Percentage	3%	5%	2%	90%
Percentage of those responding	33%	44%	22%	

3.167 One in ten consultation respondents (9 – 10%) answered question E which asked whether they agreed with the indicators and targets suggested. Around two-fifths of those who answered the question (4 – 44%) broadly disagreed with the indicators and targets or said they needed to be changed. A third (3 – 33%) broadly agreed with the proposed targets and indicators. A further fifth commented but did not clearly agree or disagree.

3.168 A few respondents highlighted concern about the indicator and target relating to the number of jobs created. In particular, there was concern that new businesses would not necessarily lead to a net increase in good quality jobs.

“We do not think that relating jobs created to population increase is necessarily relevant. This is a complex area; for example new supermarkets often claim they are creating a large number of jobs

when in fact they are replacing a multitude of jobs already existing in the surrounding area.”

(Blair Atholl & Struan Community Council)

3.169 Other comments included:

- The targets are very ambitious – given the time it might take for the economy to recover.
- The indicators need to capture a range of business activity – including self employed people and casual workers.
- GVA is a discrete measure, unrelated to inflation.

Question 12F: Can you tell us about better indicators or more appropriate targets?

3.170 Only eight per cent of consultation respondents (7) suggested better indicators or improved targets. Some comments made in response to question E are relevant and are outlined here.

3.171 Suggestions included measuring:

- net employability growth (rather than job creation);
- progress in infrastructure and housing (particularly affordable housing);
- population increase; and
- the effectiveness of efforts to enhance and protect the specific qualities of the Park.

3.172 Scottish Enterprise highlighted a range of information that is available from the Royal Deeside Destination Management Organisation area which may be helpful:

- Average expenditure per person per day.
- Total expenditure by staying visitors.
- Associated Gross Value Added (of staying visitors).
- Total number of commercial bed spaces.
- Number of days visiting friends or relatives.
- Number of staying visitors (excluding visiting friend or relatives).
- Total number of visitor days.
- Length of stay.
- Associated direct employment.

Question 12G: Can you provide data for better indicators?

3.173 Only three per cent of respondents (3) commented on this question which asked whether they could provide data for better indicators.

3.174 Specific suggestions were made by two local authorities:

- one offered to provide data on the numbers of business start-ups in the area; and
- the other offered to provide figures on housing supply.



Five-year Outcome 7: Settlements and built development will retain and enhance the distinct sense of place and identity within the landscapes of the Park

Question 13A: Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Type	Yes	No	Neither/Both	No Response
Private individuals	5	1	2	25
NGOs/ voluntary organisations	5	1	0	8
Other public bodies	2	0	0	11
Land owners/ managers	2	2	0	4
Community organisations	2	1	0	5
Other private businesses and business interests	3	0	0	4
Local authorities	1	0	0	2
Total	20	5	2	59
Percentage	23%	6%	2%	69%
Percentage of those responding	74%	19%	7%	

3.175 Under a third (27 – 31%) of consultation respondents answered this question which asked whether outcome seven was appropriate for the Park Plan. Of those who did answer, 74 per cent (20) broadly agreed that the outcome was an appropriate one. Nineteen per cent (5) said the outcome was not appropriate or needed to be changed, and a further 7 per cent (2) commented but did not clearly agree or disagree.

3.176 A few respondents who broadly agreed with the spirit of the outcome, felt that it contradicts the approach the National Park Authority has taken to development in the past.

“Almost every example of a new build housing development containing more than one or two houses which has occurred since the Park was established, has failed to retain the indigenous character of settlements, far less enhance its character.”

(Scottish Campaign for National Parks)

3.177 However, other respondents suggested that a balanced and realistic approach needs to be taken to development. As a result, some raised doubts about how realistic the expectations outlined in this section might be.

“Realism about delivering this without curbing excessive growth is needed.”

(Badenoch and Strathspey Conservation Group)

3.178 A Community Council and a land owner felt that this outcome should place a stronger emphasis on the importance of affordable local housing.

“It is noted that the aims of the Park are to protect and enhance the sense of place within the Park. However, this outcome does not go far



enough to recognise that the Park also requires new housing, and that there will be a degree of housing development within the Park.”

(The Crown Estate and the Dunachton Estate)

3.179 Two respondents asked for greater clarity about the approach to dispersed settlements or developments outside existing settlements, given their importance in the area.

3.180 Other comments made by individual respondents included suggestions that the outcomes and associated text should:

- take better account of the landscape;
- make clear there are a range of different distinct places within the Park;
- recognise the importance of mixed use development; and
- recognise the importance of people to the sense of place.

Question 13B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Table 3.24: Responses to Q.13B by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	1	0	1	31
NGOs/ voluntary organisations	1	2	2	9
Other public bodies	0	1	1	11
Land owners/ managers	0	1	0	7
Community organisations	2	0	0	6
Other private businesses and business interests	2	0	0	5
Local authorities	0	1	0	2
Total	6	5	4	71
Percentage	7%	6%	5%	83%
Percentage of those responding	40%	33%	27%	

3.181 Fewer than one in five consultation respondents (14 – 17%) answered this question which asked if they agreed that the packages of work identified would deliver outcome seven. Of those that did answer, 40 per cent (6) broadly agreed and one third (5 – 33%) broadly disagreed or said the work packages needed to be changed. A further 27 per cent (4) commented but did not clearly agree or disagree.

3.182 The main issue, raised by a few respondents in their responses to questions B and C, was that there should be a stronger emphasis on access to affordable housing and associated support within the work packages. A range of respondents, including land owners, a local authority, and private individuals commented on this.

“The packages appear to assist in delivering protection for the various distinct senses of place. . . . In order for settlements to be well functioning however there has to be the availability of housing for all income levels and all members of the communities.”

(Aberdeenshire Council)



3.183 Scottish Enterprise and SNH expressed concern about the “Quality In Design Package”, suggesting it may not be the best way of reaching the target audience or may be costly. SNH asked for greater clarity on how it would be used, and one respondent proposed the use of Supplementary Planning Guidance instead.

Question 13C: Are there any better packages of work that would deliver the outcome?

3.184 Nine per cent of consultation respondents (8) answered this question which asked for better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are also outlined here.

3.185 Specific suggestions included:

- promoting the use of screening and small scale developments within existing settlements;
- reduced promotion of the area as a place to live and visit;
- awards and recognition schemes for good design and craftsmanship;
- using the landscape framework and Sustainable Design Guide to inform new development; and
- a programme for environmental improvements in existing settlements.

3.186 Individual respondents suggested this section should place a stronger emphasis on:

- the role of the local community and the private sector;
- material issues for the care of the landscape within the Local Development Plan; and
- delivering the Government’s place-making agenda.

Question 13D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money?

3.187 Nearly one in ten consultation respondents (8 – 9%) answered this question which asked what they could do to deliver the outcome.

3.188 Respondents made a number of different suggestions. These included:

- a community organisation offered skills and advice;
- a local authority highlighted its planning role and potential support to improve public or open spaces;
- a housing developer emphasised their role in delivering this outcome;
- a public body offered advice on strategic policy and guidance and suggested trialing new ways of involving communities; and
- another public body highlighted the Rural Property Support Scheme and the Rural Petrol Station Grant Scheme.

Question 13E: Do you agree with the indicators and targets suggested for this outcome?

Table 3.25: Responses to Q.13E by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	1	2	0	30
NGOs/ voluntary organisations	1	3	0	10
Other public bodies	0	2	0	11
Land owners/ managers	0	0	0	8
Community organisations	0	2	0	6
Other private businesses and business interests	0	1	0	6
Local authorities	0	1	0	2
Total	2	11	0	73
Percentage	2%	13%	0%	85%
Percentage of those responding	15%	85%	0%	

3.189 Fifteen per cent of consultation respondents (13) answered the question which asked whether they agreed with the indicators and targets suggested. Of those that did answer, 85 per cent (11) disagreed or said the indicators or targets needed to be changed. The other 15 per cent (2) broadly agreed with them.

3.190 The main concern was that the indicator was insufficient and too narrow to be the only measure of progress towards this outcome. A number of respondents, including a local authority, two NGOs, a private business, a private individual and two public bodies expressed this view or asked for substantial additional indicators or targets.

3.191 Some of these respondents felt that the target and indicator did not cover important elements of the outcome or was too focused on delivery – rather than impact.

“This indicator is rather narrow and should be wider than just high street improvement projects. In addition, the target is just to complete all the projects. That could be one or a hundred. It is an input, not an outcome, and needs to be more specific.”

(North East Mountain Trust)

3.192 Others, such as Scotia Homes, felt that the delivery of other elements of the work packages needed to be measured.

“It is considered that the number of indicators should be extended beyond High Street improvements to include all developments over specific scale.”

(Scotia Homes)



Question 13F: Can you tell us about better indicators or more appropriate targets?

3.193 Eight per cent of respondents (7) answered this question which asked for better indicators or more appropriate targets.

3.194 Specifically, respondents proposed measuring:

- Community and visitor satisfaction – with places and the landscape.
- The number of developments that increased the biodiversity value of development site.
- The amount of development around settlements and the proportion of developments informed by landscape guidance.
- The number of landscape character areas affected positively or negatively by settlement expansion or development.
- The value of projects such as the high street improvement projects.
- Employment.
- Property take up rates.
- Data from the Carbon Trust to understand the extent of considerable building activity.

3.195 Some respondents also suggested that specific targets and indicators should be developed to measure the delivery of other aspects of the work packages.

Question 13G: Can you provide data for better indicators?

3.196 No respondents answered this question.

Five-year Outcome 8: Business and communities will be successfully adapting to a low carbon economy

Question 14A: Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Type	Yes	Disagree	Neither/Both	No Response
Private individuals	4	1	3	25
NGOs/ voluntary organisations	4	1	1	8
Other public bodies	3	0	1	9
Land owners/ managers	1	0	3	4
Community organisations	2	0	0	6
Other private businesses and business interests	2	0	0	5
Local authorities	1	0	0	2
Total	17	2	8	59
Percentage	20%	2%	9%	69%
Percentage of those responding	63%	7%	30%	

3.197 Under a third of consultation respondents (27 - 31%) answered this question which asked whether outcome eight is appropriate for the Park Plan. Of those who did answer, 63 per cent (17) agreed the outcome was appropriate. Only

seven per cent (2) of those who responded broadly disagreed or said the outcome needed to be changed. A further 30 per cent (8) commented but did not clearly agree or disagree.

3.198 Several respondents explained they agreed with the “aspiration” and “ethos” of this outcome. However, there were also concerns.

3.199 Several respondents, including NGOs, private individuals and a land owner questioned the extent to which this outcome was an appropriate one for the National Park Authority. For example, there was concern that it would attract activity and resources which may be better focused on other outcomes.

“We question how relevant this is to the Park. The work packages as outlined are essentially national, and there is nothing of specific relevance to the Park. . . . The problem with this sort of outcome is that it attracts scarce resources away from locally more important issues (without in any way, saying that at a national level this is not extremely important).”

(North East Mountain Trust)

3.200 A few respondents, whilst agreeing with the outcome, felt it was at odds with the approach the National Park Authority has taken in recent times – particularly in relation to wind farms and housing.

3.201 Specific suggestions to improve the outcome or related text included:

- emphasising the role of renewable energy schemes; and
- taking account of the need to adapt to indirect effects of climate change.

Question 14B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Type	Yes	No	Neither/ Both	No Response
Private individuals	1	1	1	30
NGOs/ voluntary organisations	0	3	2	9
Other public bodies	0	3	2	9
Land owners/ managers	0	0	1	7
Community organisations	2	0	0	5
Other private businesses and business interests	1	0	0	6
Local authorities	1	1	0	1
Total	5	8	6	67
Percentage	6%	9%	7%	78%
Percentage of those responding	26%	42%	32%	

3.202 About one in five consultation respondents (19 – 22%) answered this question which asked if they agreed that the packages of work identified would deliver outcome eight. Of those that did answer, 42 per cent (8) disagreed or said the work packages needed to be changed. Twenty-six per cent (5) broadly



agreed with the work packages. A further 32 per cent (6) commented but did not clearly agree or disagree.

3.203 A few respondents reinforced views put forward in relation to question A, and questioned the local relevance of the work packages.

“The proposed outcome is fine, but the delivery is far from convincing. . . however, apart from influencing land use, most of what needs done will be down to national government, given the scale of the changes required.”

(Scottish Campaign for National Parks)

3.204 Some felt that the existing packages were insufficient and should be developed further.

3.205 Suggested changes to existing work packages included:

- Including “innovation” under work package 1 (which relates to training, advice and demonstration).
- Ranking the actions in order of priority – beginning with increasing energy efficiency in existing stock; then more energy from local renewables; and demand for locally produced food and timber products is increased.
- Adding the work of the Highland Council to improve the energy efficiency of private sector housing to work package 4 (piloting ways of reducing energy).

Question 14C: Are there any better packages of work that would deliver the outcome?

3.206 Nine per cent of consultation respondents (8) answered this question which asked for better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are also outlined here.

3.207 Specific suggestions included developing new packages or improving existing packages to:

- reduce carbon dioxide emissions for new developments;
- deliver the waste reduction and improvements to waste management schemes;
- manage habitats to improve the sequestration of carbon;
- implement core paths;
- develop demonstration sites for land and species management in relation to climate change;
- deliver enhanced capacity for carbon storage; and
- raise awareness.



Question 14D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money?

3.208 One in ten consultation respondents (8 - 9%) answered this question which asked what they could do to deliver the outcome.

3.209 Respondents made a number of different suggestions. These included:

- a community organisation offered skills, advice and leadership;
- a local authority offered support on work package 4 (which relates to piloting ways of reducing the energy needs of old buildings);
- another local authority emphasised existing work;
- an NGO offered to work with the Park Authority to deliver a system to support land managers maintain carbon stores; and
- a public body highlighted its role in reducing carbon emissions from its own operation and offered to share experience and provide advice on carbon management of land. It also proposed working with the National Park Authority to establish a climate change demonstration site.

3.210 In addition, a public body suggested that Transport Scotland should be added as a delivery partner for work package 2 (which relates to infrastructure improvements).

Question 14E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	2	2	1	28
NGOs/ voluntary organisations	0	0	0	14
Other public bodies	0	2	0	11
Land owners/ managers	0	0	0	8
Community organisations	1	1	0	6
Other private businesses and business interests	0	0	0	7
Local authorities	0	1	0	2
Total	3	6	1	76
Percentage	3%	7%	1%	88%
Percentage of those responding	30%	60%	10%	

3.211 About one in ten consultation respondents (10 - 12%) answered this question which asked whether they agreed with the indicators and targets suggested. Of those that did answer, 60 per cent (6) broadly disagreed or said the indicators and targets needed to be changed. Thirty per cent (3) broadly agreed with the indicators and targets. In addition, one respondent commented but did not clearly agree or disagree.

3.212 A community group, a local authority and a public body questioned how the energy efficiency of existing stock might be measured. One suggested that a baseline was not available.

“We question whether there is a baseline for energy performance of the existing building stock within the Park. If not, we would suggest this needs to be baselined before a reduction target can be set.”

(Scottish Enterprise)

3.213 Two private individuals and a community group felt there should be indicators relating to other cycle journeys as well as journeys by public transport.

3.214 One respondent reinforced earlier comments, saying they felt the targets and indicators did not adequately focus on the benefits of the outcome.

Question 14F: Can you tell us about better indicators or more appropriate targets?

3.215 Six per cent of consultation respondents (5) commented on this question which asked for better indicators or more appropriate targets.

3.216 Specific suggestions included measuring:

- fuel poverty (perhaps based on a Scottish Government data);
- the number of cycle paths – instead of cycle journeys;
- broadband access;
- improved accessibility by non-car modes using accessibility modeling; and
- adaptation measures to flooding.

Question 14G: Can you provide data for better indicators?

3.217 Only one respondent, a local authority, answered this question. They proposed further discussions about sharing data.

Five-year Outcome 9: The Park’s communities will be more empowered and able to develop their own models of sustainability

Question 15A: Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Table 3.29: Responses to Q.15A by Stakeholder Group				
Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	5	0	2	26
NGOs/ voluntary organisations	3	1	1	9
Other public bodies	1	0	1	11
Land owners/ managers	0	1	1	6
Community organisations	1	0	0	7
Other private businesses and business interests	1	0	1	5
Local authorities	2	0	0	1
Total	13	2	6	66
Percentage	15%	2%	7%	76%
Percentage of those responding	61%	10%	29%	

3.218 A quarter of consultation respondents (21 – 24%) answered this question which asked whether outcome nine was appropriate for the Park Plan. Of those that did answer, 61 per cent (13) broadly agreed it was appropriate. Only 10 per cent (2) broadly disagreed or said it needed to be changed. A further 29 per cent (6) commented but did not clearly agree or disagree.

3.219 Several respondents welcomed the inclusion of an outcome which focused on communities.

“The Council strongly supports actions that empower communities and release their enterprise potential”

(Aberdeenshire Council)

3.220 There was some concern, from two NGOs and a private individual, about the wording of this outcome. It was felt it may need to be reworded to ensure that community activity operates within a wider agreed framework for the Park.

“We believe that the wording of this outcome needs to be tightened up. As written, this could lead to a series of self-governing communities, inwardly focused, lacking cohesion to the wider Park, and following a non-national agenda.”

(The North East Mountain Trust)

3.221 The John Muir Trust also suggested the outcome may need to be reworded.

“We are somewhat concerned . . . particularly in relation to the potential for communities to develop and implement projects, and to generate income and maintain the facilities and services they want. This could potentially provide a back-door for larger scale development to occur.”

(The John Muir Trust)

3.222 A few respondents highlighted challenges in delivering this outcome:

- there are particular challenges engaging scattered communities;
- community councils can be unrepresentative; and
- funding is needed to support community development activities.

3.223 Individual respondents also suggested:

- expanding this outcome to cover communities of interest as well as communities of place; and
- including private sector developers in delivering community activities.

Question 15B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Table 3.30: Responses to Q.15B by Stakeholder Group				
Type	Yes	Disagree	Neither/Both	No Response
Private individuals	2	0	2	29
NGOs/ voluntary organisations	2	0	0	12
Other public bodies	0	0	1	12
Land owners/ managers	0	0	0	8
Community organisations	1	0	0	7
Other private businesses and business interests	1	0	0	6
Local authorities	2	0	0	1
Total	8	0	3	75
<i>Percentage</i>	<i>9%</i>	<i>0%</i>	<i>3%</i>	<i>87%</i>
<i>Percentage of those responding</i>	<i>73%</i>	<i>0%</i>	<i>27%</i>	

3.224 Thirteen per cent of consultation respondents (11) answered this question which asked whether they agreed the packages of work identified would deliver outcome nine. Of those that did answer, 73 per cent (8) broadly agreed with the work packages. A further 27 per cent (3) commented but did not clearly agree or disagree.

3.225 Highland Council, although broadly supportive of the approach, was concerned about the wording in relation to work package 2 (which focuses on housing). They suggested further discussion about what the National Park Authority hopes to achieve. A private individual highlighted their view that housing should be a key priority within the work packages.

3.226 The Mountaineering Council for Scotland was concerned that this outcome is at odds with the An Camas Mor proposal, which has caused community dissatisfaction. Aberdeenshire Council suggested that the work package to deliver affordable housing has not been followed through in the Main Issues Report.

Question 15C: Are there any better packages of work that would deliver the outcome?

3.227 Ten per cent of consultation respondents (9) answered this question which asked if there are better packages of work that would deliver the outcome. Some comments made in relation to question B are relevant and are outlined here.

3.228 Specific suggestions included:

- Using the planning system to support the development of balanced and sustainable communities and to enable provision of affordable housing.
- Working with village champions.
- Providing funding and support to community organisations.

Question 15D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money?

3.229 Six per cent of consultation respondents (5) answered this question which asked what they could do to deliver the outcome.

3.230 Respondents made various suggestions. These included:

- Two local authorities proposed that Registered Social Landlords could bring expertise and resources.
- One local authority said it would continue to support community groups and support the delivery of this outcome through planning activities.
- An NGO offered support to work with the communities in Nethy Bridge, Boat of Garten, Kingussie and Ballater.
- A public body suggested it could fund community projects.
- A public body offered support to develop social enterprises.

Question 15E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	2	2	0	29
NGOs/ voluntary organisations	1	0	0	13
Other public bodies	0	0	1	12
Land owners/ managers	0	0	0	8
Community organisations	0	1	0	7
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	5	3	1	77
<i>Percentage</i>	<i>6%</i>	<i>3%</i>	<i>1%</i>	<i>90%</i>
<i>Percentage of those responding</i>	<i>56%</i>	<i>33%</i>	<i>11%</i>	

3.231 One in ten consultation respondents (8 – 10%) answered this question which asked whether they agreed with the indicators and targets suggested for this outcome. Of those that did answer, half (5 – 56%) broadly agreed with the indicators and targets. One third (3) broadly disagreed or said the indicators and targets need to be changed. One respondent commented but did not clearly agree or disagree.

3.232 Although many broadly agreed, several respondents, including a community council, a local authority, an NGO and private individuals, raised concerns about the indicators. They felt additional indicators were needed or the existing indicators needed to be replaced to better demonstrate the progress made towards the outcome.

3.233 For example, Aberdeenshire Council suggested that it would be better to measure the elements of community plans which are being delivered well

(rather than whether they are just delivered). They also highlighted a lack of indicators relating to affordable housing.

3.234 The Mountaineering Council for Scotland also felt there needed to be a more meaningful measure of the difference being made.

“There needs to be a measure of community satisfaction and empowerment.”

(The Mountaineering Council for Scotland)

3.235 There was particular concern, from a Aberdeenshire Council and private individuals, about the second indicator (which relates to the number of communities with community development trusts).

“The second indicator and target is of little benefit and indeed may be counterproductive. A community trust is only as good as what it achieves and may just drain resources without achieving anything”

(Aberdeenshire Council)

3.236 A private individual, who had previously been involved in community trusts, felt they are not necessarily a good mechanism for achieving the outcome.

Question 15F: Can you tell us about better indicators or more appropriate targets?

3.237 Only three per cent of respondents (3) answered this question which asked for better indicators or more appropriate targets. Some comments made in relation to question E are relevant and are outlined here.

3.238 Respondents suggested there is a need to develop new indicators that measure:

- the effect of community plans;
- the extent to which communities and public agencies are working together;
- achievements in affordable housing; and
- community satisfaction and empowerment.

3.239 Specific suggestions included:

- The number of communities where expenditure by local organisations exceeds a certain amount per head of population.
- The number of learning communities rated ‘good’ or better in terms of community capacity building by Her Majesty’s Inspectorate of Education.

Question 15G: Can you provide data for better indicators?

3.240 Only one respondent, a local authority, answered this question which asked whether they could provide data for better indicators. The respondent suggested that communities and agencies should provide evidence of the level of community capacity.



Five-year Outcome 10: The Park’s recreation opportunities will have improved the health and enjoyment of residents and visitors

Question 16A: Do you agree that the five-year outcome is an appropriate one for this National Park Plan to 2017?

Table 3.32: Responses to Q.16A by Stakeholder Group				
Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	6	0	0	27
NGOs/ voluntary organisations	5	2	1	6
Other public bodies	3	1	1	8
Land owners/ managers	2	0	0	6
Community organisations	1	0	0	7
Other private businesses and business interests	2	0	0	5
Local authorities	1	0	0	2
Total	20	3	2	61
Percentage	23%	3%	2%	71%
Percentage of those responding	80%	12%	8%	

3.241 Over a quarter of consultation respondents (25 - 29%) answered this question which asked whether outcome 10 was appropriate for the Park Plan. Of those who answered, most (20 - 80%) broadly agreed it was appropriate. Only 12 per cent (3) broadly disagreed or said it needed to be changed. A further 8 per cent (2) commented but did not clearly agree or disagree.

3.242 Some respondents welcomed the inclusion of an outcome which related to recreation, health and wellbeing.

“It is an important role for national parks to be seen as making a significant contribution to health and wellbeing.”

(Scottish Campaign for National Parks)

3.243 However, two NGOs and a land owner were concerned about the consequences of promotion of recreation opportunities. The John Muir Trust highlighted the importance of prioritising the special qualities of the Park.

“The John Muir Trust broadly agrees with the aims of Outcome ten . . . Providing the opportunities for more people to enjoy the Park is important, but this should not occur at the expense of many of the other special qualities identified.”

(The John Muir Trust)

3.244 The RSPB said that this section of the Plan should be revised to take account of this.



“The impression is that during the last few years, recreation has been over-promoted in the Park to the detriment of the natural environment and we need to ensure that this is redressed. We would ask for an explicit statement here that “recreational development and activity must be sensitive to the area’s special qualities and not detracted from them.”
(RSPB)

3.245 Seafield and Strathspey Estates said there is a need to educate those participating in recreational activities of responsible access.

3.246 The Woodland Trust did not agree with the outcome, because it would be too difficult to measure progress towards.

“Research tells us that there is a direct link between health and exercise, however, we think it would be difficult to measure changes in health and enjoyment in the Park.”

(The Woodland Trust)

3.247 SNH and a private individual suggested the outcome could be broadened to include a wider range of recreational activities – including those mentioned in the community visions as well as other activities like bird watching and snowboarding.

3.248 Individual respondents also suggested:

- that this outcome fits well with local health priorities and health and transport frameworks; and
- there should be a greater emphasis on the role of recreation in attracting visitors.

Question 16B: Do you agree that the packages of work identified for this five-year outcome would deliver it?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	2	1	1	29
NGOs/ voluntary organisations	4	0	0	10
Other public bodies	1	2	0	10
Land owners/ managers	0	0	1	7
Community organisations	1	0	1	6
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	10	3	3	70
Percentage	12%	3%	3%	81%
Percentage of those responding	62%	19%	19%	

3.249 Seventeen per cent of consultation respondents (15) answered this question which asked whether they agreed that the packages of work would deliver outcome ten. Of those that answered, 62 per cent (10) broadly agreed. Nineteen per cent (3) broadly disagreed or said the packages needed to be

changed and the same proportion (3 - 19%) commented but did not clearly agree or disagree.

3.250 Several respondents, including a community organisation, NGOs and a public body, highlighted the importance of core paths and welcomed the focus on maintaining existing paths and promoting them.

“We strongly agree with the intention to promote the core path network and other promoted routes.”

(Sportscotland)

3.251 ScotWays suggested there is a need to prioritise recreation on low ground in developing the core path plan. The North East Mountain Trust warned that core path networks need to be taken carefully, and emphasised they would strongly oppose the development of new paths in the sensitive inner core of the Park.

3.252 Ramblers Scotland and SNH suggested it is important to develop better links between cycle routes for cyclists.

“One major disincentive to travelling by bike or on foot is lack of off-road routes which connect settlements or places of interest.”

(Ramblers Scotland)

3.253 A few respondents emphasised the need to raise awareness of opportunities, responsibilities and safety issues in appropriate ways with people using the Park for recreational activities. The North East Mountain Trust felt that the Park should not focus resources on activities (such as health promotion) which should be delivered at a national level.

3.254 A few respondents, including SNH, mentioned their support for work package 2 (which relates to community planning).

3.255 A few respondents commented on the development of a mountain bike development cluster. Rothiemurchus Estate was supportive of a new cluster, but felt that the cluster should be across the Highlands – rather than within the National Park. SNH said it was unconvinced that a cluster would be a good solution to the needs to increase the overall levels of cycling for transport and leisure.

3.256 SNH suggested the work packages should place a stronger emphasis on work packages which enhance enjoyment of the special qualities within the Park.

Question 16C: Are there any better packages of work that would deliver the outcome?

3.257 Thirteen per cent of consultation respondents (11) answered this question which asked if there are any better packages of work that would deliver the outcome. Some comments made in response to question B are relevant and are outlined here.

3.258 Specific suggestions included:

- Maximising opportunities as a result of different events coming up (such as sporting events in 2014 and the commemoration of John Muir's death).
- Development of off-road routes (alongside specified paths).
- Restoring past bridges.
- Developing public transport to the Cairngorms.
- Developing and promoting access to other activities – such as bird watching.

Question 16D: What can you/ your organisation do to deliver the outcome? E.g. provide leadership and co-ordination, provide skills and advice, provide money?

3.259 Eight per cent of consultation respondents (7) answered this question which asked what they could do to deliver the outcome.

3.260 Individual respondents made various suggestions. These included:

- a community organisation offered skills and advice;
- a local authority offered advice, financial support, and support for core path development and COAT;
- an NGO highlighted their role in promoting walking opportunities and coordinating volunteers;
- a public body offered support to explore the experiences of and target specific users to use the Park;
- another public body offered advice and potentially financial support with various projects; and
- a private individual highlighted the role of Cairngorm Mountain Limited in providing guided walks.

Question 16E: Do you agree with the indicators and targets suggested for this outcome?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	3	1	0	29
NGOs/ voluntary organisations	0	1	0	13
Other public bodies	0	0	0	13
Land owners/ managers	0	0	0	8
Community organisations	0	1	0	7
Other private businesses and business interests	1	0	0	7
Local authorities	1	0	0	2
Total	4	3	0	79
Percentage	5%	3%	0%	92%
Percentage of those responding	57%	43%	0%	

3.261 Eight per cent of consultation respondents (7) answered this question which asked whether they agreed with the indicators and targets suggested. Fifty-



seven per cent (4) broadly agreed. Forty-three per cent (3) broadly disagreed or said that the indicators and targets needed to be changed.

3.262 A few respondents felt that the indicators are not good measures – although there was recognition that measuring changes to peoples’ health and wellbeing was difficult. In keeping with earlier comments, a few respondents emphasised the need to measure any negative impacts on the environment as a result of increased recreation.

Question 16F: Can you tell us about better indicators or more appropriate targets?

3.263 Ten per cent of consultation respondents (9) answered this question which asked for better indicators or more appropriate targets.

3.264 Individual respondents suggested the indicators and targets could be improved by:

- measuring public awareness;
- measuring whether work packages are successfully delivered;
- clarifying whether visitor or resident numbers were referring to “the number of people in the Park”;
- measuring the provision and take up of public transport; and
- measuring opportunities for recreational opportunities and usage.

3.265 Specific suggestions included measuring:

- the number of miles of core paths completed or improved;
- the status of species of concern;
- the number of people with access to a health walk opportunity;
- the number of adults making one or more visits to the outdoors each week;
- the number of people taking part in health walks in the Park; and
- the number of people taking part in guided walks in the Park.

Question 16G: Can you provide data for better indicators?

3.266 No respondents answered this question. However, SNH drew attention to ongoing work with the National Park Authority to boost the National Park sample in a new national survey.

Question 17: Do you agree with the key principle on page 58?

Type	Yes	Disagree	Neither/ Both	No Response
Private individuals	8	2	0	23
NGOs/ voluntary organisations	6	3	1	5
Other public bodies	4	0	0	9
Land owners/ managers	4	0	0	4
Community organisations	2	0	0	6
Other private businesses and business interests	2	1	0	4
Local authorities	1	0	0	2
Total	27	5	1	53
Percentage	31%	6%	1%	62%
Percentage of those responding	82%	15%	3%	

3.267 Over a third (33 - 38%) of respondents commented on whether they agreed with the key principle on page 58. Of those who did respond, 82 per cent (27) said they agreed, and one respondent provided additional comments or made suggestions.

3.268 Several respondents welcomed the idea of taking a balanced approach. This included a few public bodies (who felt this took account of their own interests), and two land owners.

“Yes, taking a balanced approach is absolutely necessary to meeting the aims and outcomes of the Park Plan.”

(Mar Estate)

3.269 However, some respondents, particularly NGOs, mentioned the importance of environmental protection when taking a balanced approach. The Woodland Trust Scotland felt that there is a need to have a categorical statement about the protection of native woods and trees of high value for conservation, and an obligation to enhance the area. On the other hand, two land managers and another business who supported the principle emphasised the importance of improving the economy in the long term.

3.270 In addition, Aberdeenshire Council and Mar Estate (who were supportive of the principle) asked for the Plan to include a way of measuring whether progress was being made towards this principle.

Question 18: If not, why not?

3.271 Only seven per cent of consultation respondents (6) answered this question which asked for further comments on why they did not support the principle. Some comments made in relation to question 17 are relevant and are included here.

3.272 Two NGOs and a private individual questioned how meaningful this principle was, suggesting that it does not add anything to the Plan or the existing aims set out in legislation.



“In part this “principle” is unarguable. – land use management and use always delivers multiple benefits (and perhaps losses) . . . in general we are not convinced that this attempt to supplant or complement the objectives of the Park as laid down in the relevant Act is very useful.”

(North East Mountain Trust)

3.273 An NGO, a private business and two private individuals drew attention to the aims of the National Parks Act, which they felt were not completely reflected in the principles.

“The principle states that ‘long term outcomes, always ensuring that the special qualities are conserved, and where possible, enhanced’. However, according to . . . the National Parks (Scotland) Act 2000 – to conserve and enhance the natural and cultural heritage of the area is the primary principle objective.”

(The Woodland Trust Scotland)

Question 19: Do you agree with the opportunities and threats identified, if not why?

Type	Yes	No	Neither/ Both	No Response
Private individuals	4	3	0	26
NGOs/ voluntary organisations	4	5	2	3
Other public bodies	2	1	2	8
Land owners/ managers	1	2	2	3
Community organisations	0	0	1	7
Other private businesses and business interests	1	0	0	6
Local authorities	1	0	0	2
Total	13	11	7	55
Percentage	15%	13%	8%	64%
Percentage of those responding	42%	35%	23%	

3.274 Just over one third of respondents answered this question (31 - 36%). Of those responding, 42 per cent (13) agreed with the opportunities and threats identified, and 35 per cent (11) disagreed. However, many of the responses included caveats with, for example, respondents stating that they agreed but suggesting an amendment or addition. Nearly a quarter of respondents (7 – 23%) did not clearly state whether they were in agreement or not.

3.275 Aberdeenshire Council agreed with the ‘SWOT’ analysis given in the Plan and particularly supported the inclusion of affordable housing and energy inefficient housing. They felt that a *“further opportunity should be to explore other tenures and methods of delivering affordable housing”*. The Mountaineering Council for Scotland supported the opportunities and threats identified especially the focus on ‘wildness’.

3.276 SCNP and SEPA both agreed with the content but felt that there should be stronger reference to the wildlife and ecological benefits that farming can bring.



“Under the Farmlands category we suggest consideration is also given to opportunities for farmland to also contribute to improvements to ecological status through reductions in diffuse pollution through land management practices.”

(SEPA)

3.277 Forestry Commission Scotland were supportive of the opportunities and threats in relation to woodland and forestry but called for the approaches to be augmented.

“FCS would suggest that in addition the use of traditional, but not necessarily native forest species, is recognised as appropriate in some parts of the NP, that thinning is encouraged as a positive management intervention and that the preparation and adoption of long term forest plans are promoted.”

(Forestry Commission Scotland)

3.278 Among those disagreeing, there were a range of suggested changes or additions in relation to the habitat types. In terms of farmlands, Alvie and Dalraddy Estates challenged the perceived threat to iconic wild bird species and argued that the biggest threat to such species is *“climate change, the increase in predators and disturbance”*. They also argued that food production within the Cairngorms is an opportunity. North East Mountain Trust took an alternative view and argued that the limited viability of farming represents an opportunity and that public support mechanisms *“should be utilised (and modified through pressure on Scottish and other governments) so as to best serve Park objectives, i.e. public (and not private) goods and services”*. Sportscotland felt that another opportunity that should be noted is access and recreational improvements / provision made available through farm subsidy payments.

3.279 The Cairngorms Campaign / The Scottish Wild Land Group felt that there were key weaknesses and threats in relation to farming:

“Rising energy costs, and also the increasing shortage of certain key farming skills such as those of skilled shepherds (also referred to under Threats). Other Threats include the ageing population of certain sectors, including hill farmers, and the lack of new entrants to those sectors.”

(The Cairngorms Campaign / The Scottish Wild Land Group)

3.280 In relation to woodland and forestry there were concerns raised by some land owners / managers who argued that the comment on single exotic species was overstated that a more significant threat is the timber industry.

“The reduction in establishment and restocking of woodlands for timber production since 1988 is a major weakness and threat to our timber processing industry as this will result in a decline in future timber yields and source of raw material for our sawmills and



processors. This weakness is far more important than a lack of natural tree lines or blocks of single exotic species.”

(Alvie and Dalraddy Estates)

3.281 Two respondents felt that the high deer population in the Park should be specifically noted as a threat as it inhibits natural regeneration.

“Management of wild deer populations is one challenge where significant progress needs to be made.”

(Badenoch and Strathspey Conservation Group)

3.282 Some respondents including private individuals and Scottish Native Woodlands questioned whether “reduced profitability of commercial forestry replanted with native species” was a threat as stated.

“Is this a threat, given that much of the commercial forestry in the Park already consists of native species, or is it a mindset?”

(Scottish Native Woodlands)

3.283 Several respondents commented on the opportunities and threats in relation to rivers, lochs, wetlands and floodplains. These mainly related to tensions between recreational use and habitat preservation. While private individuals raised concerns about impact on wildlife some NGOs and other public bodies focused on improving recreation. SportsScotland argued that there is an opportunity to address conflicts between canoeists and anglers on river use. Edinglassie Estate felt that there should be more focus on developing the economic benefits from salmon and trout fishing.

3.284 There were some more general comments on the SWOT analysis mainly relating to the overall approach to land use. Mar Estate noted that the section highlights the opportunity of “managing the balance of land uses and pressures for land use change” and the threat of “loss of land to other uses” but felt that *“there is no clear direction on how the tension between these is to be dealt with”*. ScotWays felt that the section focuses the Plan on conservation rather than recreation or economic development.

“...it has to be noted that the approach taken in this section is shifting the balance back towards a conservation-led approach, where the recreation values of the area are beginning to be somewhat squeezed out, because of the emphasis on action for land cover and processes, for example, in the listing of the most significant opportunities (p.66).”

(ScotWays)



Question 20: What are the particular opportunities and threats that you think the Plan should address between 2012-2017?

3.285 Many of those responding to this question reiterated the issues they had raised at Question 19 and some highlighted issues that had not been covered in the Draft Plan.

3.286 Some respondents including NGOs/ voluntary organisations and private individuals felt that preserving wildness was a key issue – particularly in the face of development within the Park.

“There is great urgency to address the threat of a reduced sense of wildness as a result of the visual impact of development. The minimum should be to achieve no loss between 2012-17 as wildness is extremely rarely gained, and frequently lost both through incremental development as well as major development. Enhancing wildness is dependent on protection before it is lost.”

(Mountaineering Council for Scotland)

3.287 However, Mar Estate felt that economic development requires some land to be allocated and developed for alternative uses.

“The most sustainable locations for that to happen are in or adjacent to existing settlements. This is the key opportunity that the Plan should address between 2012 and 2017.”

(Mar Estate)

3.288 Aberdeenshire Council reiterated their concern for energy efficiency and provision of affordable housing but raised the issue of limited funding from the Scottish Government.

“What will have to be considered is that in order to deliver new affordable housing it will for the majority have to be part of larger private development to allow for cross subsidisation. The public funding will not be available from Scottish Government without a form of cross subsidy from the private sector.”

(Aberdeenshire Council)

3.289 North East Mountain Trust felt that reduced central funding was a key threat for the five year period. They also stated that there is a significant opportunity for the Park in the revision from 2014 of the Common Agricultural Policy (CAP) and particularly the Scottish Rural Development Programme.

“[The revision] provides a significant opportunity for requesting and utilising changes that will benefit the Park, e.g. retargeting of funding away from large-scale farming in other, lower-nature-value parts of Scotland.”

(North East Mountain Trust)



3.290 Ramblers Scotland highlighted “the lack of safe, sustainable routes to services (footpaths/ cycleways)” (highlighted in the towns and villages section) as a key issue to be addressed in the period.

3.291 SCNP felt that the key threats were the degradation of grasslands and moorlands as a result of overgrazing (particularly by deer) and the threat to woodlands from inappropriate development. They felt that national policy on land use presented opportunities for the Park.

“The main opportunities arise from the convergence of the Government’s Land Use strategy as a vehicle for creating new initiatives and the very fact that the NPA has a responsibility to find new ways of doing things which are truly sustainable.”

(SCNP)

Question 21: Policy Direction One - Enhance the special landscape qualities

A – Do you agree with the proposed approach?

Type	Yes	No	Neither/ Both	No Response
Private individuals	5	1	1	26
NGOs/ voluntary organisations	8	0	0	6
Other public bodies	3	1	0	9
Land owners/ managers	0	2	2	4
Community organisations	2	0	0	6
Other private businesses and business interests	0	0	0	7
Local authorities	0	0	0	3
Total	18	4	3	61
Percentage	21%	5%	3%	71%
Percentage of those responding	72%	16%	12%	

3.292 Under one third of respondents answered this question (25 - 29%). Of those responding, there was strong support for Policy Direction One with 72 per cent (18) saying that they agreed with the approach. There was support for the policy direction from all of the stakeholder groups that responded with the exception of land owners / managers.

3.293 Several of those that agreed said that they supported the aim of conserving and enhancing wildness and landscape qualities. North East Mountain Trust stressed that all development, including “enhanced access” may reduce these qualities.

“We would like to see that the supplementary guidance on wildness is given special emphasis. All planning applications should be required to address the implications of the proposed development in the light of the wildness guidance.”

(North East Mountain Trust)



3.294 ScotWays while supporting the emphasis on wildness/ landscape quality expressed concern that the Plan does not include a “*coherent statement on landscape*” and argued that the text for the policy direction is “*incomplete in not covering the impacts of development and other land use change*”. The Cairngorms Campaign / The Scottish Wild Land Group went further and said that they have “*very serious misgivings about the CNPAs assessment of landscape*” principally because of the example of the proposed development at An Camas Mòr.

3.295 SCNP supported the policy direction but were concerned about moves to rationalize National Scenic Areas (NSAs) within national parks particularly if NSAs become absorbed within the national park designation. They also related concern on this issue to previous development proposals in the Park.

“If anything, as the premier accolade, NSAs within national parks should be strengthened with better management regimes and better accessibility.”

(SCNP)

3.296 Of the land owners / managers disagreeing with the policy direction, Rothiemurchus Estate felt that it was unnecessary to introduce a Landscape Framework. Edinglassie Estate stressed the need for consultation with land managers before the Framework is completed. Alvie and Dalraddy Estate argued that there was an overemphasis on landscape qualities ahead of other economic activity in the Park.

“Whilst landscape is important to many visitors few come to the Cairngorms National Park area specifically for its landscape. More often they are attracted by recreation opportunities. There is concern that the over emphasis on tourism could dominated and damage other economic activities.”

(Alvie and Dalraddy Estate)

B – Would you suggest a different or additional policy approach?

3.297 Just seven respondents proposed a different or alternative approach in relation to Policy Direction One.

3.298 Rothiemurchus Estate were opposed to the idea of a Landscape Framework and felt that encouraging best practice in land management should be an appropriate approach.

“The landscape should be formed by good practice in terms of biodiversity, sustainable land use management, building and urban design.”

(Rothiemurchus Estate)

3.299 Scottish Natural Heritage were concerned that the policy directions are “*quite vague and generic*”. They felt that there should be more detail on the work packages that will deliver them and said that there should be more



explanation of “*how the landscape framework should be used to inform land use decisions*”. They were also concerned that the policy was very ambitious and they recommend “*focusing on the qualities that are in particular need of enhancement*”. They also recommend that the approach to ‘enhance habitat connectivity’ is “*expanded to ‘enhance habitat condition, diversity, scale and connectivity’*”.

3.300 The Cairngorms Campaign/ The Scottish Wild Land Group felt that the phrase ‘Conserving and enhancing these qualities needs work on a big scale...’ should be reworded to say ‘...needs work on a range of scales from the smallest to the very large since “*the qualities that make up the landscape exist on a whole range of scales*”. They also said that they were “*unclear how wildness may act as a proxy for landscape qualities*” and recommended that “*the CNPA provides information on the criteria it used to assess high to low wildness qualities to enable people to better interpret the map*”.

3.301 Ramblers Scotland argued that procedures should be in place “*to ensure that the 2011 Supplementary Planning Guidance on wild land is a material consideration in the determination of every planning application in the National Park*”. They also said that they would like the CNPA to retain the National Scenic Areas within the Park “*to maintain a clear focus on the most significant landscapes*”.

Question 22: Policy Direction Two - Enhance biodiversity

A – Do you agree with the proposed approach?

Type	Yes	No	Neither/ Both	No Response
Private individuals	5	1	1	26
NGOs/ voluntary organisations	5	1	0	8
Other public bodies	3	0	0	10
Land owners/ managers	1	2	1	4
Community organisations	2	0	0	6
Other private businesses and business interests	0	0	1	6
Local authorities	0	1	0	2
Total	16	5	3	62
Percentage	19%	6%	3%	72%
Percentage of those responding	67%	21%	12%	

3.302 Just over a quarter of consultation respondents answered this question (24 – 28%). Of those that did, a majority (16 – 67%) agreed with the proposed policy direction. Five respondents (21%) disagreed. Most of the respondent groups expressed support although this was not the case for landowners/ managers or local authorities.

3.303 Most of the respondents that gave a positive answer did not give detailed responses. North East Mountain Trust welcomed a broader approach to biodiversity:

“We see the benefit of complete habitat health, rather than targeting specific species. Extending specific monitoring and protection beyond designated sites provides an opportunity to demonstrate the positive benefits of “National Park” designation.”

(North East Mountain Trust)

- 3.304 A couple of respondents said that they supported the proposal but raised some concerns with the drafting. SCNP felt that there needs to be greater knowledge of the impacts of development on biodiversity in order to achieve the commitment to ‘no net biodiversity loss’.

“We do have concerns, however, about the statement to have ‘no net biodiversity loss’, given the current level of knowledge available for EIAs. There needs to be a step change in knowledge of the likely effects of development on biodiversity and a more rigorous examination of the application of the precautionary principle. It is SCNP’s view that within a national park, to borrow a phrase, ‘it is not business as usual’ and NPAs have to boost their expertise so that environmental assessments are not developer-led as at present.”

(SCNP)

- 3.305 Edinglassie Estate said that there will be external factors which will impact on biodiversity at sites including climate change. They also argued that land managers should be consulted in the calculation of ‘net biodiversity loss’.

“The Plan does not set out how ‘net biodiversity loss’ would be calculated although the presumption proposed is laudable. This policy is something that should be developed with land managers and could be progressed in conjunction with the Wildlife Estates Scotland Initiative.”

(Edinglassie Estate)

- 3.306 Among those disagreeing, there was some concern about the focus on designated sites.

“We should look at our habitats and environment as a whole and not pick out designated features on designated sites. Some of these designations and their condition classification are questionable.”

(Alvie and Dalraddy Estates)

- 3.307 Aberdeenshire Council raised concerns that the approach would mean developers could seek to ‘pay off’ the impact of development rather than make appropriate biodiversity enhancements.

“We would be concerned that there is a risk that developers will use the ‘biodiversity fund’ rather than make on-site biodiversity enhancements or that the proposals that would otherwise be refused on biodiversity grounds can ‘pay off’ their impacts. We would also query the legitimacy of seeking developer contributions and whether paragraph 11 of Circular 1/2010 Planning Agreements would be met.”

(Aberdeenshire Council)



3.308 Woodlands Trust Scotland did not feel that the proposal for ‘no net loss’ goes beyond what they would expect from the CNPA.

“We do not agree that a presumption of no net loss is going beyond ‘business as usual’. We would expect the CNP Authority to be aiming for conserving and enhancing biodiversity, for example, investing in increased areas of native woodland will aid the NPA and its officers to enhance delivery of their duty to further the conservation of Biodiversity as defined in the Nature Conservation (Scotland) Act 2004.”

(Woodlands Trust Scotland)

B – Would you suggest a different or additional policy approach?

3.309 Eleven respondents suggested a different or additional policy approach in relation to Policy Direction Three.

3.310 Some felt that the focus should cover a wider geographical area rather than designated sites.

“It would be useful to include an objective to enhance the states of key habitats and species beyond designated sites (eg via habitat connectivity, diversity and increasing patch size, rather than simply to monitor them).”

(Scottish Natural Heritage)

3.311 Other respondents felt that there should be a more pro-active approach in favour of biodiversity.

“There should be a presumption in favour of biodiversity not a ‘no net biodiversity loss’ approach regardless of the circumstances.”

(Alvie and Dalraddy Estates)

3.312 Scottish Wildlife Trust felt that the policy should include enhancing the national ecological network (which is referenced under ‘Greening the Environment’ in National Planning Framework 2).



Question 23: Policy Direction Three - Expand and enhance woodland

A – Do you agree with the proposed approach?

Type	Yes	No	Neither/ Both	No Response
Private individuals	4	1	2	26
NGOs/ voluntary organisations	3	3	2	6
Other public bodies	3	0	1	9
Land owners/ managers	1	2	0	5
Community organisations	2	0	0	6
Other private businesses and business interests	0	0	0	7
Local authorities	0	0	0	3
Total	13	6	5	62
Percentage	15%	7%	6%	72%
Percentage of those responding	54%	25%	21%	

3.313 Twenty-eight per cent of respondents (24) answered this question. A majority of those responding (13 – 54%) agreed with the proposed approach for Policy Direction Three. A quarter disagreed (6 – 25%) and more than a fifth (5 – 21%) gave a response that did not clearly agree or disagree.

3.314 Those in agreement generally supported the objective of woodland expansion.

“In principle this section is very positive and links appropriately with the Forest and Woodland Framework.”

(Seafield and Strathspey Estates)

3.315 Some respondents, while supporting the proposal were uncertain how ambitious it is and also raised concerns about interaction with other land uses such as farming or recreation.

“...on the one hand, better land for better quality trees might well interact adversely with farming, while more semi-natural woodland could affect valued open country, and there are well known and difficult issues over how best to implement woodland recovery.”

(ScotWays)

“[Support] but only if it recognises the importance of farming and food production and is developed in a way compatible with this other major land use.”

(Action of Churches Together in Scotland – ACTS)

3.316 North East Mountain Trust said that they supported the approach but only on the basis that Policy Directions One and Two are given sufficient emphasis and that *“potential conflicts are well-managed.”*



“Targets for expansion of woodland cover should be driven by landscape character and habitat quality, not simply by a national figure. It should be established that species are appropriate to a particular local area.”

(North East Mountain Trust)

3.317 SEPA said that they support the promotion of natural flood management in the approach.

“Natural features and characteristics include those which can assist in the retention of flood water such as floodplain, woodlands and wetlands. The safeguard of such features from inappropriate development within the Plan would assist with contribution to a sustainable approach to flood management.”

(SEPA)

3.318 There were some objections to the proposal. Edinglassie Estate did not feel that the Park is an appropriate place for woodland expansion.

“While we recognise that the Scottish Government has a policy objective of increasing woodland cover to 25% of the land area we question whether it is correct that the Park should be seen as the appropriate place for any expansion. The reality is that if woodland area is to increase then this will be at the expense of farmland and/or moorland.”

(Edinglassie Estate)

3.319 A number of respondents disagreed on the basis that they felt the CNPA should focus more on the promotion of native natural woodland.

“A National Park is not there to promote productive woodland but to promote natural native woodland. And of course also natural native woodland has economical benefits.”

(Private individual)

B – Would you suggest a different or additional policy approach?

3.320 Ten people commented on this part of the question. Some felt that the policy on woodland expansion should be linked with considerations around wood production.

“There should be a presumption in favour of expanding woodland but this should be coupled with wood production. The final decision will be made by the land occupier. Our landscape benefits from a diversity of land uses.”

(Alvie and Dalraddy Estates)

3.321 Rothiemurchus Estate felt that the policy direction should recognize the need for timbers that can be harvested in summer as well as winter months to make operations sustainable.



3.322 Other comments were more focused on conservation. Woodlands Trust Scotland felt that a commitment to double the area of native woodland would aid the delivery of many of the Plan's aims.

"The map on page 73 highlights the potential to achieve a doubling of native woodland. Native woodland is one of the most biodiverse habitats in the country. To deliver the Biodiversity duty defined in the Nature Conservation (Scotland) Act 2004 an increase in native woodland cover is essential. We would like to see more emphasis on this in the Plan and acknowledgement of all the benefits native woodland can bring."

(Woodlands Trust Scotland)

3.323 Ramblers Scotland wanted to see greater protection for specific woodlands.

"We would also like woods of high conservation value, particularly those close to settlements, to be protected from development."

(Ramblers Scotland)

3.324 Two respondents felt that there needs to be focus on the enhancement of woodland in mountainous habitats.

"...we would recommend a wide definition of "woodland" that explicitly encompasses montane scrub and that the policy of expanding and enhancing applies to this habitat as well as the more generally recognised native woodland types."

(Mountaineering Council for Scotland)

3.325 Scottish Natural Heritage (SNH) felt that the approach should consider wider issues than currently covered and that there should be a detailed analysis of the appropriate level of woodland coverage.

"We recommend expanding the 'policy approach' about enhancing woodland cover and connectivity so that it also covers increasing woodland patch size and age class and species diversity. These are also required to enhance woodland condition and improve resilience to external changes e.g. climate change. We think further analysis of constraints and trade-offs is needed before deciding whether 25% is the right level of woodland cover to aim for in the Park. An alternative style of target that would be easier to justify would be to aim to increase the size of the small patches of woodland (eg between 2 and 5Ha). We'd be happy to work with you to develop a suitable target along these lines."

(SNH)

3.326 SNH also argued that a collaborative approach across land management units is "essential" in order to achieve the desired connectivity and flood management benefits.



Question 24: Policy Direction Four - Enhance resilience of habitats and land use to climate change

A – Do you agree with the proposed approach?

Table 3.39: Responses to Q.24A by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	6	0	1	26
NGOs/ voluntary organisations	6	0	0	8
Other public bodies	3	0	0	10
Land owners/ managers	1	0	1	6
Community organisations	1	0	1	6
Other private businesses and business interests	0	0	0	7
Local authorities	0	0	0	3
Total	17	0	3	66
Percentage	20%	0%	3%	77%
Percentage of those responding	85%	0%	15%	

3.327 Nearly one quarter of respondents answered this question (20 – 23%). There was considerable support for Policy Direction Four among those who responded, with 85 per cent (17) expressing support and no respondents disagreed with the approach. Three respondents (15%) gave comments that were ambiguous.

3.328 SEPA said that they particularly welcomed the references to habitat networks, floodplain functionalist and erosion control and they also welcomed the promotion of protection of the floodplain. However, they note that:

“...there are other significant flood risk policies which the Planning Authority could be considering, such as avoidance of development in areas at risk and we request that consideration be given to their inclusion.”

(SEPA)

3.329 Edinglassie Estate agreed with the approach but felt that *“the policy could usefully refer to the protection of moorland recognising its function in relation to carbon storage”*.

3.330 The Cairngorms Campaign and The Scottish Wild Land Group supported the policy and made an additional comment on the issue of increasing biomass.

“We would add that ‘implications’ for ‘Increasing biomass’ also includes (by virtue of both increased biomass and increased porosity of soils) reduction of both rate and amount of run-off from land, thus reducing flood peaks and contributing to less extreme flows and better river quality. Such positive results are strongly to be supported.”

(The Cairngorms Campaign / The Scottish Wild Land Group)



3.331 North East Mountain Trust also supported the approach but felt the policy should go further on tackling climate change – although they felt that this should be supported by national resources.

“...we feel [the approaches] do not go far enough and simply seek to mitigate the effects of climate change. We wish to see a more active approach with the aim of slowing the causes of global warming. However,...national resources should be used for this and Park resources used on Park specific aspects such as conservation of the unique environment.”

(North East Mountain Trust)

B – Would you suggest a different or additional policy approach?

3.332 Six respondents made comments in terms of a different or alternative approach. The Mountaineering Council for Scotland noted the uniqueness of high altitude habitats and the potential for greater connectivity.

“...high altitude habitats and species are faced with a unique challenge. Where connectivity can be enhanced, this needs to be a priority as should any other measure to enhance the resilience of these habitats.”

(Mountaineering Council for Scotland)

3.333 SNH focused on the requirements to ensure that habitats are resilient to climate change.

“To enhance the resilience of habitats to climate change requires improving habitat condition, scale and diversity, as well as enhancing connectivity. Diverse biological communities are thought to be more likely to adapt to climate change and climate variability than impoverished ones, and where there is high genetic diversity the ability for a species to remain in an area is enhanced. We recommend the first policy approach is expanded to cover these issues.”

(SNH)

3.334 SNH also noted that they are currently producing Adaptation Guidelines as part of their Climate Change Action Plan. This will include action points that they think would be useful to incorporate here, including: *“making space for natural processes; improving habitat management; reducing other pressures (e.g. grazing); and taking an adaptive approach to management”*. They also highlight the importance of blanket bog, peatlands and carbon-rich soils in storing carbon and the benefits management to minimize erosion.



Question 25: Policy Direction Five - Contribute to a low carbon economy

A – Do you agree with the proposed approach?

Type	Yes	No	Neither/ Both	No Response
Private individuals	7	2	0	24
NGOs/ voluntary organisations	5	1	1	7
Other public bodies	2	0	1	10
Land owners/ managers	2	3	0	3
Community organisations	2	0	0	6
Other private businesses and business interests	1	0	0	6
Local authorities	0	0	1	2
Total	19	6	3	58
Percentage	22%	7%	3%	67%
Percentage of those responding	68%	21%	11%	

3.335 A third of respondents commented on Policy Direction Five (28 – 33%), with a strong majority (19 – 68%) agreeing with the proposed approach. Six respondents (21%) disagreed. There was support for the approach from most respondent groups but stronger opposition from land owners/ managers.

3.336 Those in agreement supported a strong policy in relation to climate change and there was specific support for the presumption against wind farms and spatial guidance on the provision of renewable energy generation.

3.337 John Muir Trust supported the policy direction but were cautious about the wording in relation to low impact energy generation particularly in terms of scale and windfarms.

3.338 Land owners / managers that disagreed felt that there should be more autonomy on land use. And one argued that a focus on local production would reduce carbon consumption.

“Land use will primarily be dictated by the land occupier, mapping significant carbon stores is likely to be an academic exercise of little practical use. Producing our needs locally will often save more carbon through reduced transport requirements than reducing greenhouse gas emissions from land use practices.”

(Alvie and Dalraddy Estates)

3.339 There was some opposition to the presumption against development of windfarms.

“I do not agree with the blanket presumption against wind farms as I believe the Park should be encouraging sustainability and local self-sufficiency where possible.”

(Private individual)



3.340 SportsScotland felt that guidance on renewable energy should consider issues in relation to recreational activities.

“In relation to the proposed guidance on sensitivities to renewable energy, it will be important to include recreational sensitivities as part of this assessment. Scottish Government policy as set out in the Scottish Planning Policy is clear on the need to take recreational interests into account in considering renewable development.”

(SportsScotland)

B – Would you suggest a different or additional policy approach?

3.341 Eleven respondents suggested a different or additional policy approach in relation to Policy Direction Five.

3.342 A number of respondents felt that there should not be a presumption against the development of windfarms. John Muir Trust agreed that the Plan should have a presumption against large windfarm developments but felt that:

“...it should not necessarily restrict all windfarm developments - this may not be prudent given current Scottish Government guidance, nor practical given the potential of some sites within the National Park to support small-scale, sensitively-sited community schemes.”

(John Muir Trust)

3.343 Scottish Wildlife Trust and The Cairngorms Campaign / The Scottish Wild Land Group both highlighted the issue of carbon sequestration.

“The CNPA should implement or commission research into the carbon sequestration potential of various types of land (wetlands, peatlands, woodlands, moorlands, etc) particularly to determine the carbon sequestration potential of land, currently under high grazing/burning pressure, should the regime be changed to one of low grazing/no burning, which allowed natural regeneration of woodland, increased ground biomass and increased carbon storage in soils.”

(The Cairngorms Campaign / The Scottish Wild Land Group)

3.344 SNH felt that there should be an additional policy approach supporting the use of public transport and active travel.

3.345 Aberdeenshire Council felt that the policy should have greater focus on the benefits derived from the production of timber.



“Greater emphasis needs to be placed on the potential gains from extensive commercial woodlands which offer low carbon and long term affordable heating fuel for homes and businesses, and especially in helping to reduce fuel poverty long term. It has the added benefit of providing local employment, is truly renewable and helps to displace imported energy.”

(Aberdeenshire Council)

3.346 One individual felt that the policy direction should include provision for low carbon housing standards and a requirement that no new housing development should result in an increase in commuting – housing should be built near existing development and employment opportunities.

Question 26: Policy Direction Six - Provide high quality recreation opportunities

A – Do you agree with the proposed approach?

Table 3.41: Responses to Q.26A by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	4	0	0	29
NGOs/ voluntary organisations	6	2	0	6
Other public bodies	2	1	0	10
Land owners/ managers	1	3	0	4
Community organisations	2	0	0	6
Other private businesses and business interests	0	0	0	7
Local authorities	0	0	0	3
Total	15	6	0	6
Percentage	17%	7%	0%	76%
Percentage of those responding	71%	29%	0%	

3.347 Nearly one quarter of consultation respondents answered this question (21 - 24%) with a strong majority (15 – 71%) agreeing with the proposed approach. Six respondents (21 - 29%) disagreed.

3.348 Most of those supporting the approach did not give detailed comments. One community organisation felt it is important that people can enjoy recreation in less sensitive areas.

“Agree with proposed approach. We think it is important to encourage visitors to enjoy the recreation facilities of less-sensitive areas which can often offer very similar experiences to those in more sensitive habitats while reducing the environmental impact.”

(Blair Atholl and Struan Community Council)

3.349 SCNP agreed but stressed that there needs to be a focus on ensuring recreation is delivered in a sensitive way.

“Yes, with the emphasis on quality. This will require pro-active leadership on the part of the NPA to understand what is happening on the ground so that conflicts with conservation and land management concerns are minimised.”

(SCNP)

3.350 Most land owners/ managers felt the policy does not fully recognise the recreational opportunities in the Park. Edinglassie Estate felt that there should be more recognition of shooting, stalking and fishing and that *“the Plan should also examine how conflicts between recreational activities are mitigated”*. Mar Estate felt that the section (and map) doesn't recognise the *“benefits and opportunities”* available on the eastern side of the Park.

3.351 ScotWays and North East Mountain Trust both felt that the approach was too general and requires further detail. For example, ScotWays called for more recognition of access rights and greater promotion of responsibilities for those accessing land.

3.352 Sportscotland felt that the Policy Direction should give more detail on what the visitor pressures are in different areas of the Park.

“It is important to fully understand who is responsible for visitor pressure, what specifically the pressures are and...to take a positive and evidence based approach to tackling the pressures that exist.”

(Sportscotland)

B – Would you suggest a different or additional policy approach?

3.353 Ten respondents suggested a different or additional policy approach in relation to Policy Direction Six.

3.354 The most frequent comment was that policy must ensure recreation does not have a detrimental impact on the environment. For example, the Badenoch and Strathspey Conservation Group felt that *“the CNPA should ensure recreation is not promoted without due consideration of environmental and other impacts”*. Ramblers Scotland felt that a Recreation Strategy should be developed to help address conflicts.

“We would like to suggest the Park develops a Recreation Strategy which would tie together the core paths plan, outdoor access strategy and the work of COAT [Cairngorms Outdoor Access Trust] within a zoning framework. This would help identify any conflicts between recreational land management practices, such as commercial stalking and shooting, and outdoor recreation patterns.”

(Ramblers Scotland)



3.355 SNH noted that the aim of the policy direction (quality recreational opportunities) is slightly different from the related 5 year outcome (improving health and enjoyment via recreation) and felt that this “*seems a little confusing in the absence of any further explanation*”. They also felt that to meet the overall policy direction:

“...an additional ‘policy approach’ focused on further improvements to the existing path network to improve its functionality and the quality of recreational experiences is probably needed.”

(SNH)

3.356 Sportscotland reiterated their view that there needs to be a strong evidence base for approaches in relation to recreation. They felt that there should be evidence gathering on the “*impacts from recreation on the natural heritage*” and also those visiting the Park.

“It is important that visitors are not treated as an amorphous group and to properly understand the different sectors that visit the Park and what their differing characteristics and needs are and the potential challenges they present.”

(Sportscotland)

Question 27: Policy Direction Seven - Target proactive advice and public support to help land managers deliver multiple benefits

A – Do you agree with the proposed approach?

Table 3.35: Responses to Q.27A by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	4	0	2	27
NGOs/ voluntary organisations	2	0	2	10
Other public bodies	3	0	0	10
Land owners/ managers	2	0	1	5
Community organisations	2	0	0	6
Other private businesses and business interests	1	0	0	6
Local authorities	0	0	0	3
Total	14	0	5	67
<i>Percentage</i>	<i>16%</i>	<i>0%</i>	<i>6%</i>	<i>78%</i>
<i>Percentage of those responding</i>	<i>74%</i>	<i>0%</i>	<i>26%</i>	

3.357 Among the 22 per cent of those responding, there was significant support for Policy Direction Seven, with 74 per cent (14) expressed support and no respondents disagreed with the approach. Five respondents (26%) gave comments that were ambiguous.

3.358 Most of those agreeing did not give detailed comments. North East Mountain Trust said that they welcomed an integrated approach.



“We welcome an integrated approach to support, advice and training to/for land managers. Training to encourage preferred behaviour is particularly important. In terms of finance, we favour a move away from payments for actions (or avoidance of a harmful action) to a system of payment on desired outcome.”

(North East Mountain Trust)

- 3.359 SEPA said that they support “the emphasis on Catchment Management approaches in this section”. SNH supported the approach but felt that it reads more like an action than a ‘policy direction’.

“A better alternative may be to word the ‘policy direction’ something like ‘manage land to deliver the best combination of multiple benefits’ and then ‘targeting advice and support’ could be a delivery mechanism.”

(SNH)

- 3.360 Mar Estate emphasised the need for partnership in this policy direction.

“The approach needs to be a partnership approach and subject to consultation with landowners. The public benefit priorities that are yet to be identified need also to take a balanced approach that recognises the specific requirements of field sports and avoids conflict between land uses.”

(Mar Estate)

B – Would you suggest a different or additional policy approach?

- 3.361 Eight respondents suggested different or additional approaches. SCNP stressed the need for the Park Authority to take a strong lead and provide a ‘one stop shop’ approach.

“...the NPA needs to negotiate a position of influence, where it can offer a one stop shop of advice to develop National Park values and at the same time offer a hierarchy of opportunity for land managers to development more public benefits.”

(SCNP)

- 3.362 Woodland Trust Scotland felt that it would not be practical to rely on existing resources to provide advice and said that a “*specific new advisory service for the CNP area is our recommendation for making this approach work*”.

- 3.363 SNH repeated their view that some of the section reads more as specific actions rather than approaches. And they said that they “*would welcome inclusion of the first policy approach (about identifying public benefit priorities) as a 5 year work package*”.

- 3.364 One private individual felt that it is important to “*improve the coverage and coordination of Ranger Services and to secure improved public benefit*”. This respondent suggested that Ranger Services could be provided through a partnership arrangement similar to COAT.



Question 28: Policy Direction Eight - Develop sustainable patterns of settlement growth, infrastructure and communications

A – Do you agree with the proposed approach?

Table 3.36: Responses to Q.28A by Stakeholder Group				
Type	Yes	No	Neither/ Both	No Response
Private individuals	3	3	2	25
NGOs/ voluntary organisations	2	4	2	6
Other public bodies	4	0	1	8
Land owners/ managers	1	1	0	6
Community organisations	2	0	0	6
Other private businesses and business interests	2	0	0	5
Local authorities	0	0	0	3
Total	14	8	5	59
Percentage	16%	9%	6%	69%
Percentage of those responding	52%	30%	18%	

3.365 Nearly one third of respondents commented (27 – 31%). Half said that they agreed with the approach (14 – 52%). Nearly a third (9 – 30%) disagreed and 18 per cent (5) gave responses that did not commit either way.

3.366 Those supporting the approach gave a number of additional comments. Blair Atholl and Struan Community Council felt that the policy could be worded to reflect the importance of connecting the communities within the Park. Rothiemurchus Estate said that there are more communities than those highlighted on the map in this section.

3.367 John Muir Trust generally agreed with the approach but stressed that there needs to be *“caution to ensure that the aspiration is ‘sustainable development’ and not necessarily ‘sustainable economic growth’”*. They note that the former *“recognises the inter-dependencies between economic development, environmental protection and social inclusion”*.

3.368 The most common objections to the policy direction related to the proposed approach to settlement development including the establishment of a new community at An Camas Mòr. Many of the comments repeated views given in response to the Main Issues Report. SCNP felt that the approach to settlement development is counter-productive.

“It is our view that the CNPA will not achieve its objectives here because it has entered into a self-perpetuating cycle which will result in more commuting to conurbations outside the Park, more holiday and second homes inside the Park and an attractive location to retire with all the modern conveniences.”

(SCNP)

“A plan like An Camas Mòr should be only the result of an economic demand – because there is a demand for workers there has to be



another development. And not to build another development and to try to increase the employment.”

(Private individual)

- 3.369 One individual was concerned that the policy will not address the issue of affordable housing within the Park or the issue of second homes and unoccupied properties.

“There is no evidence to show that the number of houses being proposed in the area will improve the shortfall of social housing needs for Park workers. The empty homes, 2nd and 3rd homes, within the Park should be paying for the loss of businesses through increased council taxation or similar.”

(Private individual)

- 3.370 Some respondents sought greater clarity on what improvements would be made to the A9. And SportsScotland said that it is as important that opportunities for walking and cycling provision are considered.

B – Would you suggest a different or additional policy approach?

- 3.371 Ten respondents proposed a different or additional approach.

- 3.372 Mountaineering Council for Scotland felt that only the first ‘policy approach’ should be implemented to deliver the housing needs of the Park and that this would be a more sustainable approach than that being considered.

- 3.373 Land owners/ managers considered the needs of small and scattered communities. Rothiemurchus Estate argued that these should be enabled to grow at a rate that is acceptable to the community. Alvie and Dalraddy Estates said that they would like to see *“a more favourable approach to more housing in the countryside particularly where it is associated with land use”*.

- 3.374 Aberdeenshire Council and a private individual felt that there should be more focus on affordable housing.

“There is not as strong an emphasis on the delivery of affordable housing, which is a shift from the current plan. Why is this the case?”

(Aberdeenshire Council)

- 3.375 SEPA said that there needs to be consideration of sustainable waste management.

“We recommend that Policy Direction 8 is amended to include reference to the sustainable management of waste and the development of infrastructure which will enable the population of the National Park to increase recycling and reduce waste generation, through links to the relevant Local Authorities Waste Strategies.”

(SEPA)



3.376 SNH felt that there should be a reference in the section to the Local Development Plan and the Sustainable Design Guide. They also felt that since the policy addresses transport infrastructure *“there should presumably also be policy approaches to support active travel, and the availability and use of a variety of forms of public transport and vehicle-sharing”*.

Other substantive comments

3.377 Some of the respondents gave additional comments. Most of the comments reiterated points highlighted elsewhere in the consultation or related to specific local detail. The following issues were raised that are substantive to the questions in the draft Park Plan consultation (and the Main Issues Report):

- Consultation process – some community groups felt that the consultation paper was off-putting with too many questions. One group felt that the public consultation exercises did not give sufficient time for views to be considered.
- Delivery – several respondents felt that there needs to be strong emphasis on joint and partnership working to take the Plan forward. Aberdeenshire and Highland Councils felt that there needs to be further consideration of the role that Delivery Groups play. Aberdeenshire felt that these groups have become too large and unfocused and suggested that smaller teams should lead delivery. Scottish Land and Estates indicated that their members were concerned that the draft Plan does not fully address delivery, and delivery mechanisms needed to be addressed.
- Clarity – respondents raised concerns about the clarity of the Plan document which some described as long and complex. There were comments in relation to the document’s layout, clarity on how the objectives and different types of outcome relate to one another, and concerns that there are too many targets and indicators.
- Transport – some respondents felt that the Plan does not sufficiently cover issues around transport to and from (rather than within) the Park. These respondents felt that there could be more recognition of role that the Regional Transport Partnerships (and individual councils) have to play in the Park’s interconnectedness – and it’s accessibility to visitors.
- Sense of ownership – Scottish Land and Estates indicated that their members did not have a sense of ownership of the National Park.

Annex One - Consultation Respondents

Local authorities

Aberdeenshire Council
Highland Council
Perth and Kinross Council

Other public bodies

Aberdeen City and Shire Strategic Development Planning Authority
Forest Enterprise Scotland (part of Forestry Commission Scotland)
Forestry Commission Scotland (FCS)
Highlands and Islands Enterprise (HIE)
Historic Scotland
Nestrans (North East of Scotland Transport Partnership)
Scottish Enterprise
Scottish Environment Protection Agency (SEPA)
Scottish Natural Heritage (SNH)
Sportscotland
Tactran (Tayside and Central Scotland Transport Partnership)
Transport Scotland
Visit Scotland

NGOs/ Voluntary organisations

Action of Churches Together in Scotland (ACTS) Rural Committee
Badenoch & Strathspey Conservation Group
The Cairngorms Campaign
Cairngorms Outdoor Access Trust
John Muir Trust
Mountaineering Council for Scotland
North East Mountain Trust
Ramblers Scotland
Royal Society for the Protection of Birds (RSPB)
Scottish Campaign for National Parks (SCNP)
Scottish Native Woodlands
The Scottish Wild Land Group
Scottish Wildlife Trust
ScotWays (Scottish Rights of Way and Access Society)
Woodland Trust Scotland

Land owners/ managers

Alvie and Dalraddy Estates
The Crown Estate
Dunachton Estate
Edinglassie Estate
Glenprosen Estates
Mar Estate
Rothiemurchus Estate
Seafield and Strathspey Estates

Other private businesses/ business interests

Cairngorms Business Partnership

Federation of Small Businesses – Badenoch and Strathspey Branch

Forest Holidays

Rodger Builders

Scotia Homes Ltd

Scottish Land and Estates

WalkDeeside

Community organisations

Aviemore & Vicinity Community Council

Blair Atholl & Struan Community Council

Boat of Garten and Vicinity Community Council

Cromar Community Council

Grantown-on-Spey and Vicinity Community Council

Kincraig and Vicinity Community Council

Laggan Community Association

Nethy Bridge and Vicinity Community Council

Private individuals

35 individuals