

Analysis of responses to promoting recreational opportunities responsibly				
Respondents	Type of respondent L = land manager; U = user or promoter, P = public agency	Is there an issue to be addressed?	Does the proposed policy help address the issue?	What changes to the draft Policy are required and what further work should be undertaken?
Helen Todd, Ramblers Scotland	U	Yes	Yes	The guidance should include information on cumulative impacts; the role of education and information should be included;
Gavin Taylor, Ecurie Neep Mountain Bike Club	U	Yes	Yes	Expresses a concern that the policy is used inappropriately by those wishing to deter bike access without just cause; refers to other solutions to deal with impact e.g. trail improvement and maintenance
Alan Rankin, ACDMO & CCC	U	Not convinced	No	Lack of clarity as to why the guidance is needed; if it is required then should be written more positively; need to better engage with activity providers and this should have been done prior to the consultation; need for specific examples of the current problems and whether there have been any dissatisfied customers; asks whether SOAC does not cover this effectively; CNPA should lobby SNH for changes to the Code rather than threaten businesses; suggests redirecting resources towards a Web2.0 presence and influencing writers; increase awareness of responsible businesses working through ACDM; promote SOAC.
Debbie Greene, SNH	P	Yes	Yes	Frame the guidance within the context of SOAC 3.63; clarify when land managers should be approached; acknowledge the shortcomings of such guidance in reaching target audiences with rapidly evolving social media; comments on the 'self-regulating' potential of websites/blogs
Simon Blackett, Invercauld Estate	L	Yes	Partially	Supported the SRPBA response
David Jardine, FCS	P	Yes	Yes	Additional action required to hold an annual meeting of relevant parties to raise awareness, disseminate information, protected species info etc; potentially able to assist in helping to shape future changes to SOAC; extend guidance to those hiring recreation equipment;
Thomas McDonnell, Glenfeshie Estate	L	Yes	Yes	Recommends stronger wording to put a greater onus on those promoting access opportunities; need to highlight seasonal impact such as mountain biking after a thaw; over use of facilities can also cause problems e.g. DofE groups always camping at the same location; further thinking required on including "or their representative groups"

Anne Gray, SRPBA	L	Yes	Partially	Need to consider whether a policy is required or whether the issues could be better dealt with through targeted promotion of existing messages i.e. taking 3.63 and LRSA together; need to include specific examples of the problems; need to avoid resentment by careful choice of language; need to address cumulative impacts in the document; policy should tease out the role of promoters in considering whether the activity can be undertaken responsibly and encouraging their audience to make responsible decisions; there should be a role for the CNPA in resolving issues of dispute between parties; include information on costs of providing access and highlight potential payback mechanisms.
Stuart Benn, RSPB	L	Yes	Partially	Need to explain that as well as access legislation, environmental legislation also applies; need to also consider those taking quiet enjoyment and wildlife watching; need for a map based approach which would require the promoter to demonstrate mitigation against negative impacts; guidance should also include best practice advice and relevant research into wildlife disturbance; need to clarify how disagreements in interpreting the guidance would be resolved.
Vicky Hilton, Crown Estate	L	Yes	Partially	Include reference to wildlife disturbance, land management, livestock and environmental issues.
Fergal MacErlean, freelance writer	U	Yes	Partially	Include guidance for mountain bikers on damage caused to fragile upland paths.
Johnnie Grant	L	Yes	Partially	More thought needs to be given into how to reach the target audience and the most effective means of influencing those who write promotion material; the role of CNPA should be to gather evidence, carry out informal investigations and bring the interested parties together; greater cross reference is required to various sections in the SOAC and the Park Plan.
Hebe Carus, MCofS	U	Yes	Yes	Further thought required on how best to promote it and on its practical implementation.
Mountain Innovations	U	Not convinced	No	Consultation process should have engaged with activity providers at an earlier state; there is a lack of specifics in the policy; the policy should be developed at a national level by SNH to avoid possible contravention with the access legislation.
Fiona McNally, PFAP	P	Yes	Partially	Include reference to SOAC; consider at what stage contact with land managers should occur; include access officer contact details; explain where best practice promotion advice can be found; consider data protection in relation to land manager database; consider branding criteria for all promotion material within the National Park.

Timothy Poole, Caper BAP group	P	Yes	Partially	Needs greater specificity in relation to the environment, particularly in relation to sensitive species and habitats; any promotion of events between April and August in caper sensitive areas should be with the prior agreement of SNH and the land manager.
Dave Windle, NEMT	U	Yes	Partially	Would like to see promotion encouraged at specific facilities e.g. Wolftrax and loch Morlich, and limited within the core environmentally sensitive area; requires stronger guidelines on group size and nature of the activity; agrees to anchoring the policy with SOAC and pleased with emphasis on dialogue with land managers
Keith Taylor, Loch Morlich Watersports	U	Yes	Partially	Need to consider impacts of promoting an area that already has a very high level of recreation and the wider impacts associated with informal camping and potential irresponsible behaviour; more consideration of impacts on other users should be given greater stress. (Wider issues on irresponsible behaviour were also raised which will be dealt with separately from this policy.)
Fred Gordon, Aberdeenshire Council	P	Yes	Partially	Needs to better reflect a neutral position and not give the impression that access promotion is a problem; needs to better link with SOAC and not try to change the SOAC message; further consideration needs to be given to feasibility of contacting land managers; contacting the access officer should be the first port of call.
Beallich	U	Not convinced	No	Lack of clarity as to who the guidance is aimed at; there should be prior consultation with the target audience otherwise it might appear as a decree from on high; needs to complement the access legislation and not go beyond it; note that not all landowners welcome a call; no need to mention the surface as it takes away from peoples' sense of discovery; language should be toned down to use "consider" rather than "should"; simplify text in the complaints section; clarify what is meant in relation to grant conditions.
Paul Corrigan	U	Yes	Yes	Welcomes the overall "guiding" tone in the text.
Roger Searle	U	Yes	Partially	Whilst there is a need to address issues, how effective a policy will be in achieving this is open to question.
Jim Gillies, FCS	L	Yes	Partially	It is virtually impossible to control cyclists; make specific references to NNRs; problems have come about through shortfalls in the access legislation, particularly with regard to commercial groups and in the lack of recourse open to land managers when things go wrong; need greater distribution of CNPA guidelines on promotion; historical use of an area is unlikely to be affected by this policy; question how you raise awareness of the sensitive nature of the area to visitors.
Jane Pritchard, Perth & Kinross Council	P	Yes	Yes	Need to consider what happens if land manager does not want promotion without justifiable reason; policy is onerous on CNPA in relation what they will be obliged to do in relation to their own promotion; use grant aid and Brand as an incentive; further incentives might be possible through web links or shelf space for material produced.

Jan Crane Photography	U	Yes	Partially	Providing a contact point is not always practical as articles can be submitted without authors name being included; can also give concerns over confidentiality and privacy.
Polly Freeman, Atholl Estates	L	Yes	Yes	Making contact with the land owner is to be welcomed as experience has shown that minor tweaks can avoid future problems.
Eric Baird, Glen Tanar	L	Yes	Yes	Need accurate directory of land managers; link direct to SOAC; refer specifically to maps.
Helen Webster, Walkhighlands.co.uk	U	Yes	yes	Policy has right balance in relation to contacting land managers; possible need to spell out the difference in scale depending on where the promotion occurs e.g. a blog as against a publication with a large print run; people are generally compliant with SOAC but more work is required with regards to dogs; circulating problems to other access forums in the Highlands would be useful; more info required on perceived and actual problems.
Mike Dales, Scottish Canoe Association	U	Yes	Yes	Several good examples that could be used in assisting those developing material e.g. not promoting specific sites for wild camping; make more specific references to impacts on wildlife, consider seasonal issues too.
Drennan Watson, Cairngorms Campaign	U	Yes	Partially	Requires a categorisation of recreational activities in the National Park accompanied with a system of zoning which will enable users to make their own judgements. Both should be incorporated in a recreation strategy.
LEADER and Brand management		N/A	N/A	Once agreed final version of the policy will provide a suitable set of criteria to apply to the brand.