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The Area of the National Park and its Boundary

The proposal

4-1 Ministers' proposal for a National Park outlined a general area for consideration, corresponding with the larger of two indicative areas set out in our advice to Government of 1999. The proposal indicated that consideration of the area must take account of the conditions in section 2(2) of the Act, including natural and cultural heritage values, distinctive character and coherent identity, and the special needs of the area. The requirement for SNH to act as reporter indicated that we should assess the area against these criteria, using an objective framework as a basis for comment on the proposal. The proposal also noted that Ministers will wish to ensure that the overall size and location of the Park are appropriate to the effective and efficient administration by the Park Authority of its functions and delivery of its purpose.

SNH consultation document

4-2 In the period before we were asked to be the reporter, SNH consulted informally with the Cairngorms Partnership's Peer Groups and with representatives of the five local authorities to develop three options for consultation on the area of the Park.

Option A was the smallest of the three areas, containing the mountain core of the central Cairngorms and the most closely-linked adjacent straths. These included central Strathspey between Newtonmore and Carr-Bridge, and upper Deeside between Ballater and Braemar. More southerly areas in Perth and Kinross and Angus were excluded.

Option B took in a significantly larger area, including Laggan, and Grantown-on-Spey to the north, the Forest of Atholl to the south-west and the Angus Glens to the south-east. In the north-east, the area extended as far as the existing Cairngorms Partnership boundary.

Option C was the largest option and was significantly larger than the current Cairngorms Partnership area. This option also took in additional areas, extending into the Ben Alder Forest in the west, slightly further into Rannoch and Tummel to the south-west, as far as Kirriemuir

and Brechin in the south-east, and around Tarland in the east.

4-3 In the consultation document we invited views on:

- the approach which SNH proposed to use to advise Ministers on the area – basically an assessment of smaller sub-units against each of the three conditions from the Act (the sub-units used in the consultation paper are shown in Map 1);
- any social, economic or environmental information about any of the sub-units which would be relevant to the assessment exercise;
- which of the options we had developed were preferred and why, making clear that other suggestions for the area were also welcome; and
- the principles which should be used to define the detailed boundary at a later stage in the process.

The approach to the assessment of the area

Comments generated

4-4 Nearly half of those who commented were in complete agreement with the proposed approach to the assessment of the area, and most of the remainder suggested only relatively minor changes or qualifications. A similar picture emerged from the community-led consultation and open public meetings, with much positive comment about the approach used and few fundamental criticisms.

4-5 Several contributors stressed the need for common sense and flexibility rather than rigid adherence to the sub-unit boundaries. Some respondents felt that the three conditions from the Act should be weighted with, for example, natural heritage quality or coherent identity assuming precedence. A converse view was also expressed, emphasising that no single factor should determine the inclusion or exclusion of particular areas. Some contributors stressed that economic need alone should not be a basis for

Table 4-1: Information suggested by respondents for consideration when assessing the Park area against the legislative conditions

inclusion of peripheral areas, as other mechanisms can address this issue outside National Parks. A number of respondents argued that the area should be determined from first principles, without reference to the availability of funding.

4-6 A few respondents raised more substantial objections to the proposed approach to the assessment. Some argued that the assessment should not be undertaken against the sub-units, but against other geographic areas such as water catchments or deer management group areas. Several contributors, including the Cairngorms Recreation Forum, also argued that the potential area should be assessed as a whole rather than as an aggregation of sub-units, or that the individual sub-units themselves lacked coherent identity. Some respondents felt that the area analysis should have been undertaken first and included in the consultation document or, more generally, that the area of the designation should be determined and agreed before consideration of the administrative and funding arrangements, in recognition of the interdependence of these issues.

4-7 Many respondents suggested additional points for consideration in relation to specific locations. These are summarised in the discussion of the Park area which follows and, where possible, included in the assessment exercise. Some respondents also referred to further published or unpublished information held by local authorities; public agencies; voluntary bodies; Local Enterprise Companies; Chambers of Commerce; known authorities on the cultural heritage (including Gaelic), and various other organisations. A number of contributors also commented on the information which should be considered in relation to all of the sub-units (Table 4-1) and, where possible, this has been used in the assessment.

Legislative conditions from the National Parks (Scotland) Act 2000	Information suggested by respondents
Natural and cultural heritage importance	<ul style="list-style-type: none"> ● Landscape quality (including wild land qualities) ● Nature conservation designations (including potential World Heritage Site listing) ● Rare or highly-valued species (raptors were frequently highlighted) ● Biodiversity Action Plan habitats/species ● Integrity/continuity of large scale ecosystems (e.g. forest habitat networks, freshwater ecosystems) ● Areas of importance to the population biology of deer and grouse ● Recreational resources ● Cultural traditions (including Gaelic and crofting) ● Sporting traditions (e.g. shinty and curling) ● Historic features (e.g. military and drove roads) ● Potential for environmental education
Distinctive character and coherent identity	<ul style="list-style-type: none"> ● Landscape character ● Ecological character ● Historic links to Cairngorms ● Present-day cultural links to Cairngorms (i.e. do communities 'look to' the Cairngorms massifs?)
Special needs of the area	<ul style="list-style-type: none"> ● Link together environmental and economic factors and provide a vibrant economy ● Recognise the significance of particular economic sectors (including tourism, outdoor recreation, field sports, agriculture, fisheries and forestry, distilleries) ● Manage pressure for development which can damage the special qualities of the area ● Recognise the importance of natural and cultural heritage to national and local economies ● Manage recreation in order to protect the value of recreational experiences and minimise potential impacts ● Complement alternative existing management mechanisms ● Provide buffer zones around sensitive areas ● Sustainable development and marketing initiatives ● Provision of Ranger Services ● Reflect patterns of land ownership (including land reform issues) ● Reflect the potential of towns to serve as Park gateways ● Provide adequate supplies of affordable housing ● Provide sources of energy generation and solutions to waste management issues

Discussion

4-8 We acknowledge the validity of the suggested alternative approaches to the assessment of the Park area, but would argue that there is no single perfect way to address this complex issue. We consider that the objections raised can and should be accommodated by sensible application of the suggested approach.

4-9 SNH has completed the assessment as proposed in the consultation document, paying attention to the suggestions noted above and other information which has been supplied. This assessment is presented in Annex D and the results are shown on Map 2. It should be emphasised that this exercise is not intended to determine the precise boundary of the National Park but it has been used to help identify the broad location and area of the Park, based on the three conditions from the Act. The results of the assessment are used in the following sections of the report.

The area of the proposed Park

Comments generated

4-10 Views on the potential area of the Park featured in most written responses, and in all open public meetings and local community consultations. Some contributors addressed no other issue. There was no overall consensus on the optimum area of the Park, with significant support for all three options described in the consultation document, and many suggestions for other areas. There was considerable variation between the views emerging from different elements of the consultation, which are summarised in Table 4-2.

4-11 Option A, or slightly modified versions of it, was advocated in more full written responses than any other option. Option A was also the clear preference emerging from most of the local community-led consultation exercises where a clear preference was expressed. In marked

Table 4-2:
Preferred area options indicated by different elements of the consultation process

Number of full written responses expressing a preference for one option (with or without suggested changes)		
Option A (the smallest option)	93	33%
Option B	68	24%
Option C (the largest option)	74	26%
Other (including Cairngorms Partnership area)	50	17%
Number of responses to the summary leaflet expressing a preference for one option (with or without suggested changes)		
Option A (the smallest option)	119	27%
Option B	86	19%
Option C (the largest option)	215	49%
Other (including Cairngorms Partnership area)	21	5%
Recorded comments at open meetings expressing a preference for one option (with or without suggested changes)		
Option A (the smallest option)	38	31%
Option B	55	44%
Option C (the largest option)	24	19%
Other (including Cairngorms Partnership area)	7	6%
Proportion of community-led consultation reports which revealed a majority view for one option (with or without suggested changes)		
Option A (the smallest option)*	13	65%
Option B	6	30%
Option C (the largest option)	1	5%

* The Highland Perthshire Community Partnership study also identified a majority view in favour of Option A.

contrast, Option C attracted much greater support among responses on summary leaflets. The balance of opinion at open public meetings was not always easy to assess, but the largest option was generally not popular and there was a broad preference for Option B.

4-12 The full range of area preferences was reflected in written responses both from within the Cairngorms and further afield, although support for the larger options was noticeably greater among those living outside the area. For example, taking all written responses, 47% of those living outside the area and 46% of those adjacent to it preferred Option C, with or without modifications. For those living within the area, the most popular area was Option A, or a similar area, with 38% support.

4-13 There was also a considerable divergence of views between the five relevant local authorities. Perth and Kinross, Highland and Moray Councils generally favoured the inclusion of large parts of their respective areas, implying support for the larger area options. Aberdeenshire Council, while noting that they were not convinced that the case for the Park had been made, preferred the inclusion of a smaller part of their area, approximating to the indicated boundary of Option A. Angus Council also preferred the inclusion of a smaller part of their administrative area, essentially the heads of Glens Clova and Prosen, intermediate between Options A and B.

4-14 A variety of arguments were advanced in favour of Option A. Many contributors felt that only the mountain core is widely regarded as the Cairngorms. This was often expressed in converse terms, by asserting that the low-lying straths are of a different, more managed character and would be inappropriate to a Cairngorms National Park. Many respondents put forward a related view, but with a greater emphasis on the interests of local communities, arguing that towns and villages at the margins look outward, relating less to the Cairngorms than to these other areas. Many respondents also felt that the nationally important features of the natural heritage are concentrated in the mountain core, and that a focus on this area would best protect these prime assets and also provide an inspiring showpiece befitting the name 'National Park'.

4-15 These views were accompanied by a variety of pragmatic arguments, the most common being that a small Park would be better funded and more able to make a difference, while a large Park might be under-resourced and ineffective. A smaller, less diverse area was also felt to be easier to manage, partly because the management aims could be more clearly defined and partly because of a greater perceived coincidence in local attitudes and expectations within the Park. A significant minority of contributors made a related point, arguing that adequate representation of local interests would be harder to achieve on the Park Board if the area was large and diverse. A few respondents, including the Town and Country Planning Association Scotland, argued for Option A to minimise the number of local authorities involved, thereby simplifying liaison and co-ordination by the Park Authority.

4-16 A few respondents favoured Option A from a standpoint of opposition to the principle of a National Park, concern about restrictions on particular recreational or commercial activities, or because of perceived disadvantages of being close to the edge of a National Park. These views generally reflected a wish to minimise the sphere of influence of the Park Authority. A significant number of contributors, who were variously sympathetic or opposed to the concept, suggested that a small Park could be established on a trial basis, and expanded if the concept had been proven to work.

4-17 The main arguments in favour of Option C included a commonly-held view that a larger, more diverse area would facilitate integrated management by accommodating a wider range of land uses and economic activities. The most frequently cited example was the diversion of tourism and other recreation away from sensitive areas to more robust sites within the Park. Much support for this option was linked to the potential for zoning, in which areas further from the central Cairngorms massif were envisaged as 'buffer zones' to protect the mountain core. Many respondents also argued that the inclusion of more settlements would allow the Park Authority to meet better the aims of sustainable social and economic development. A number of contributors stated that a larger area would not necessarily be more difficult to manage, drawing parallels

with local authorities such as Highland Council which have extensive geographical coverage.

4-18 Some support for a larger Park was based on the view that much of the mountain core is already managed with a strong emphasis on conservation or, conversely, that peripheral areas were subject to more pronounced land management problems, such as high deer populations. A few contributors felt that a larger Park was an inherently more inspiring vision. However, the single most frequent view among proponents of a large Park was simply a desire to protect the largest possible area.

4-19 The intermediate Option B, sometimes with modifications, was favoured by a minority of written contributors but was more popular at open meetings. This option was often seen as a reconciliation of the benefits and disadvantages of Options A and C. In particular, a significant number of respondents who favoured this option felt that Option A broadly represented the core of the Cairngorms area from a natural and cultural heritage standpoint, and envisaged the surrounding area included within Option B as appropriate for inclusion to allow the effective and sensitive management of the Park.

4-20 Various other suggestions were also proposed. A minority of contributors favoured the existing area of the Cairngorms Partnership, essentially because this was seen as tried, tested and recognised. A smaller number of contributors argued for a Park even smaller than Option A, focusing on the mountain core and excluding all of the adjacent straths and settlements. Proponents of this view argued that conservation and development are fundamentally contradictory and would inevitably lead to conflict, or simply that this would concentrate resources in the most important area. At the other extreme, a few contributors argued for a much larger Park, sometimes encompassing all of the Highlands and Islands, or a substantial extension of the area, most commonly into Highland Perthshire, which some respondents clearly regard as worthy of National Park status. One or two respondents also advocated subdivision of the Cairngorms into two or more contiguous Parks, based on ecological, cultural or administrative considerations.

SNH view as natural heritage adviser

4-21 In our advice to Government in 1999, we identified a minimum and maximum area of a National Park in the area and indicated that, although there may be advantages in terms of management of the natural heritage, the strongest arguments for inclusion of the larger area are based on socio-economic grounds. We considered that it was important not to extend the area so far that it begins to include territory which is not of outstanding importance to the nation for its natural and cultural heritage.

4-22 The central Cairngorms and the Lochnagar/White Mounth massifs, along with their surrounding straths, contains extensive upland landscapes of strong wild-land character, which are nationally recognised assets for outdoor recreation. The area has outstanding concentrations of landforms, habitats and species of national and international value, which do much to define the character and identity of the Cairngorms. These natural heritage resources are both fragile and subject to a wide range of competing pressures, and would clearly benefit from the integrated management which the Park would provide. The area of the proposed Park should encompass these areas, and some surrounding land, to allow for the sensitive and sympathetic management of this resource. Extension of the area of the Park beyond the straths immediately surrounding the Cairngorms and Lochnagar/White Mounth massifs would reduce the benefits provided by the designation to the natural heritage.

Discussion

4-23 There is no clear consensus on the preferred area of the Park when the consultation exercise is viewed as a whole. Significant bodies of opinion clearly favour all three of the options which were presented, and any recommendation made by SNH as reporter will not necessarily find favour with many of those who expressed an opinion. The results of the assessment exercise (Annex D and Map 2) indicate that while the most central sub-units most clearly meet the conditions from the legislation, many of the surrounding sub-units also have a strong case for inclusion within the Park.

4-24 We consider that a number of key points raised during the consultation exercise provide particularly helpful guidance on the overall size of the Park. Among the arguments we heard, we concur with the view that if the area of the Park were to be relatively tightly defined, the Park Authority could deal more effectively with the special needs which are characteristic of the Cairngorms area. We also agree with Highlands and Islands Enterprise and others who argued that many of the potential socio-economic benefits of the designation can be maximised by ensuring that the Park has a strong and identifiable image and, if the area is extended very far from the Cairngorms massifs, these benefits would be diluted.

4-25 Several strong arguments were nonetheless advanced in favour of a larger Park, including the increased potential to promote integrated management by accommodating a wider range of land uses and activities. This implies that the Park should incorporate enough ground around the montane core to realise these benefits. The commonly expressed view that the benefits of National Parks should be applied to the largest possible area is acknowledged, but must be set against the need to ensure effectiveness of this new designation, and also satisfy the desire expressed by many that the initiative should make a visible and positive difference to the way in which the area is managed.

4-26 In such circumstances, and drawing on both the results of the consultation and assessment exercises, we consider that a recommendation for the size and location of the Park can best be developed by starting from Option A (sub-units 1, 2, 3 and 5) as there was general agreement on the inclusion of at least this minimum area. However, we do not consider that the case for Option A on its own is particularly compelling. The area contains the highest ground of the Cairngorms and its associated straths in Upper Deeside and Strathspey, including many features of natural and cultural heritage value, and the area has strong character and identity associated with the Cairngorms. Nevertheless we believe that a Park focussed on this relatively restricted area would not necessarily be the best means of ensuring that the Park Authority could deliver the four aims of National Parks in a

collective and co-ordinated way, as required by the third legislative condition. In our judgement, inclusion of a greater proportion of the hill ground surrounding the Cairngorms massifs, and a larger extent of the straths associated with the mountains, and the communities they contain, will have advantages in terms of the management of the area in the long term.

4-27 Having identified that all the sub-units included within Option A should be included, the surrounding areas need to be considered individually, with reference to the assessment exercise, and taking into account the views expressed during the consultation, in order to develop a robust and rational recommendation for the whole Park.

Reporter's Advice

On balance, the arguments advanced in the consultation favour a National Park which includes the central Cairngorms and Lochnagar/White Mounth massifs, along with peripheral land to incorporate those straths and their communities which are most closely linked to them.

On the basis of the views expressed during the consultation exercise and the assessment exercise presented in Annex D and Map 2, we conclude that the following sub-units should be entirely included within the Park:

- **Cairngorms massif, Rothiemurchus and Glenmore (sub-unit 1)**
- **Carn Ealasaid and Tomintoul (sub-unit 2)**
- **Lochnagar/White Mounth, Glen Muick and Upper Deeside (sub-unit 3)**
- **Mid-Strathspey (sub-unit 5)**

The inclusion of adjacent areas is considered in subsequent sections of this report.

SNH advice as natural heritage adviser

SNH supports this recommendation. On natural heritage grounds alone a National Park which is tightly focussed on the central Cairngorms and Lochnagar/White Mounth massifs would be favoured.

4-28 The inclusion of areas adjacent to the sub-units specified above is considered in the following sections of the report under five broad geographic headings: Badenoch and Strathspey; Strath Avon, Glenlivet and Ben Rinnes; Deeside and Donside; the Angus Glens; and Highland Perthshire and Drumochter.

Badenoch and Strathspey

Comments generated

4-29 Badenoch and Strathspey corresponds to the north-western flank of the potential Park (sub-units 4, 5, 19 (part) and 21-27). There was broad support for the inclusion of central Strathspey between Newtonmore and Carr-Bridge (sub-unit 5), which fell within area Option A. The most obvious exception to this consensus was the small number of respondents who argued for the exclusion of all settlements from the Park. A few contributors, both from within and outside the immediate area, also called for the exclusion of Aviemore because of what were seen as inadequate design standards. Against this overall background there were varying levels of support for the inclusion of additional areas, and several strong themes emerged as set out below.

4-30 There is a substantial body of opinion in favour of westward extension to include the whole of Badenoch. This view was sometimes based on the quality of the natural and cultural heritage, including the Pictish fort of Dun da Lamh and the historic Corrieyairack Pass. More often, however, this argument rested on the strong community links between Dalwhinnie, Laggan and settlements further to the north-east. This view was advanced by many Strathspey residents and came across strongly at an open public meeting in Newtonmore. Local community consultation in Laggan also indicated some support for the inclusion of this community, while Kinlochlaggan residents had no wish to be included. A related argument for westward extension was based on the need for integrated management of the Upper Spey. Its proponents included the Scottish Environment Protection Agency and the Highland Council. Integrated management of this catchment was seen as beneficial to the natural heritage of the Spey,

including economically-important freshwater fisheries. These views should be set against the opinions of a significant number of respondents who felt that areas west of Dalwhinnie and Laggan are not of Cairngorms character and identity.

4-31 The inclusion of Gaick and Glen Tromie (sub-unit 4) also enjoyed some support, often based on continuity with the mountain core and a potential role as a buffer zone. The Highland Council and some other respondents also regarded Drumochter as a natural gateway to the Park, indicating that this area should be included. These arguments were tempered, in the view of a few contributors, by past modification of the area for hydro-power generation, which was felt to have degraded the water courses and some moorland landscapes. A few respondents noted the management advantages supporting the inclusion of a smaller area of this sub-unit encompassing the upper Feshie catchment.

4-32 There was clear support, both locally and from further afield, for the inclusion of Grantown-on-Spey (sub-unit 26). Many contributors viewed Grantown as an attractive designed village, with affinities to similar villages such as Newtonmore and Tomintoul, and strong cultural links to the Cairngorms. Grantown was also felt to have a close economic dependence on the Cairngorms, and to be well-placed as a potential gateway. Conversely, there was significant local concern about the potential economic effects of this community being excluded from the Park.

4-33 A smaller body of opinion also favoured inclusion of Dava Moor and Lochindorb (sub-unit 27), on grounds of the natural and cultural heritage, including native pinewood remnants, and strong social ties to the rest of Strathspey. Fewer contributors commented on the suitability of the Upper Dulnain (sub-unit 25), with little consensus on this area's inclusion. Arguments in favour of this area were based largely on its natural heritage value, including native woodland and upland habitats, but were balanced by a perception that the area is of different character to the Cairngorms.

4-34 A minority of contributors commented specifically on the Creag Meagaidh and Ben

Alder massifs (in sub-units 24 and 23), often arguing that these areas are very different from the central core and would sit uneasily in a Cairngorms National Park. Some respondents specifically disagreed with this view, or felt that these areas would derive management benefits from inclusion. A very small number of correspondents, including sportsScotland, drew attention to the opportunities for water-based recreation on Lochs Ericht and Laggan and other lochs to the west, arguing either for inclusion of these lochs to facilitate management, or expressing the view (from a recreational standpoint) that no such need exists.

SNH view as natural heritage adviser

4-35 Badenoch and Strathspey contains many areas of high natural heritage value – including the Caledonian pinewoods, birchwoods, moorlands, wetlands and broad, open straths with views to distant mountains – which are strongly associated with the identity of the Cairngorms. The area offers an abundance of opportunities to enjoy the natural heritage and this underpins a significant part of the local economy.

4-36 We note the considerable landscape, ecological and recreational assets of the upper Spey catchment, Creag Meagaidh and Ben Alder areas (sub-units 23 and 24) but consider that the natural heritage of the area west of Newtonmore has stronger affinities to the western Highlands. We therefore have reservations about the inclusion of the land to the west of Newtonmore and Dalwhinnie on these grounds and consider that their special needs can be met in other ways.

4-37 The natural heritage value of the Upper Dulnain area (sub-unit 25) and parts of Dava Moor (sub-unit 27) is not outstanding, nor is the landscape character of the area particularly characteristic of the Cairngorms area. The natural heritage management needs are subject to fewer competing demands and the potential benefits of integrated management are less strong than elsewhere in the area. On this basis we could not support inclusion of these areas on natural heritage grounds.

Discussion

4-38 There is a significant weight of opinion in favour of extending the Park further westward into Badenoch, by including the upper Spey catchment, in order to maintain community links and facilitate integrated catchment management. Taking the community aspects first, the arguments in favour of maintaining the social links between the settlement of Laggan and Newtonmore/Dalwhinnie clearly carry considerable weight. However, it should be noted that support for inclusion was rather equivocal in Laggan, and many residents have considerable doubts about the proposal.

4-39 Turning to Creag Meagaidh and the remainder of the upper Spey catchment, we did not find the arguments for inclusion particularly compelling. While Creag Meagaidh has considerable merits we considered it too remote from the central Cairngorms massif and of different character to merit inclusion within the Park. A National Park in the Cairngorms could not include all related catchments in their entirety without extending to the sea. A significant extension to cover the headwaters of one major river would logically imply similar expansion elsewhere, including the Tay catchment, grossly distorting the Park area. In addition we consider that a National Park is not necessarily the best way to address catchment-wide issues, and more appropriate mechanisms will be developed as a result of the European Union's Water Framework Directive. The Park Authority would have an important role to play in liaison with other interests to achieve integrated management of freshwater resources, a point which was recognised by the Scottish Environment Protection Agency in its response.

4-40 The arguments in favour of including all or part of Gaick and Glen Tromie (sub-unit 4) depended largely on the special management requirements, particularly the need to maintain the integrity of the adjacent area of the central Cairngorms massif. This function would most clearly be served by including the Upper Feshie catchment which has a close topographic association with, and influence upon, downstream areas in the mountain core. Inclusion of a wider area, extending westward to the A9, would provide a larger zone for deer

management purposes and take in areas of significant natural heritage and recreational value around Drumochter. The arguments for inclusion of this area are closely related to consideration of the Forest of Atholl (sub-unit 17) to the south.

4-41 We agree with the widespread support and range of arguments in favour of the inclusion of Grantown-on-Spey. Local consultation in Cromdale and Advie suggested a balance in favour of support for inclusion, and we agree that the western flank of the Hills of Cromdale has a character typical of the Cairngorms straths. Opinion on the inclusion of adjacent moorland to the north of Grantown was more ambivalent,

although inclusion of the Lochindorb/Dava Moor area was promoted by a number of contributors because of the combination of natural and historical significance.

4-42 The arguments in favour of including the Ben Alder Forest or the Upper Dulnain appear unconvincing in terms of the three conditions from the Act, particularly that concerning the character and identity of the area. There was little consensus for inclusion of this area, as implied either by the balance of preferred options for the general area of the Park, or the specific comments on these areas made by contributors.

Reporter's Advice

The Park should include central Strathspey between Newtonmore and Grantown-on-Spey, taking in both communities and Carrbridge. To the east of Grantown we recommend inclusion of the Hills of Cromdale including the communities of Cromdale and Advie (in sub-unit 26). Further consideration of the most appropriate boundary will be required to the north of the River Spey near to Advie.

The Upper Dulnain area (sub-unit 25) and the ground close to Lochindorb (sub-unit 27), along with neighbouring moorland above Glen Tulchan (in sub-unit 26), should be excluded.

To the south and west, the Park should include the settlement of Laggan and the area immediately to the north and east, encompassing Glen Banchoir and parts of the Monadhliath, extending to the summit ridge (in sub-unit 24). The Park should also take in the Gaick and Glen Tromie (sub-unit 4), on the grounds of maintaining continuity with the central Cairngorms massif to the east.

The Ben Alder Forest (sub-unit 23), Strathmashie (sub-unit 22) and the westernmost parts of the Spey catchment (west of Laggan in sub-unit 24) should be excluded.

SNH advice as natural heritage adviser

SNH supports this recommendation but notes that the case for inclusion of areas to the west of Newtonmore is not strong when considered on natural heritage grounds alone.

Strath Avon, Glenlivet and Ben Rinnes

Comments generated

4-43 The Strath Avon and Glenlivet areas (sub-unit 7) are dominated by straths extending northwards from the central Cairngorms, with Tomintoul as the principal settlement. The Ben Rinnes area (sub-unit 6) is dominated by the hill of the same name, and lies to the north of Glenlivet and Strath Avon.

4-44 The Lecht ski area attracted many comments, and a few contributors favoured exclusion because the development was seen as visually intrusive and inconsistent with Park status. A greater number of comments supported inclusion of the whole of the ski area, which was seen as broadening the range of recreational opportunities within the Park, to encourage high standards of management.

4-45 There is clearly a diversity of opinion on the remainder of this area, and few other consistent themes or consensus views emerged from the consultation. Local meetings in Tomintoul and Glenlivet did not attract large turnouts, but there was support for establishment of a Park and inclusion of these communities. A view was expressed at the Glenlivet meeting that the area was disadvantaged by comparison with high profile areas such as Deeside, and that Park status would confer a stronger identity for tourism. A few respondents to the wider consultation, including Moray Council, also considered that these communities would derive economic benefits from Park status and argued for their inclusion. The Crown Estate noted the closely-knit character of these communities, suggesting that the area be included in its entirety.

4-46 Some contributors to the wider consultation suggested that these areas should be included on grounds of high natural heritage quality and because Glenlivet Estate and Ben Rinnes were already managed in line with the aims of National Parks. The inclusion of Ben Rinnes was also encouraged on grounds of a common landscape and geological character with the central Cairngorms. On a practical level, Park status was also seen as a mechanism which

would help source funding for footpath maintenance, the key management issue affecting this hill.

4-47 A significant weight of opinion also argued for the exclusion of these areas which were seen, to varying degrees, as distinct from the central Cairngorms massif and adjoining straths. A few contributors commented that Ben Rinnes felt too remote from the heart of the Park. Others, including sportsScotland, noted the limited potential for informal recreation in these areas, at least by comparison with the central Cairngorm plateau and glens, or felt that the wider natural heritage was too undistinguished to merit inclusion. A few contributors argued for exclusion on grounds of perceived interference with commercial activities, including the forestry and distilling industries.

SNH view as natural heritage adviser

4-48 As statutory adviser on the natural heritage we agree that Ben Rinnes has high local landscape and recreational value but are not convinced that these features, nor the area's management needs, merit inclusion within the National Park. The Strath Avon and Glenlivet areas have broadly similar character to each other. Although they comprise an attractive combination of agriculture, moorland and woodland, along with many excellent recreational opportunities, they are not of outstanding natural heritage value. On natural heritage grounds they do not therefore merit inclusion within the National Park.

Discussion

4-49 The Glenlivet and Strath Avon areas (sub-unit 7) are geographically close to the central Cairngorms, but are of quite distinct character, dominated by straths with an attractive mix of moorland, forestry and farmland. The area already provides a significant focus for tourism, based largely around Glenlivet Estate. In the assessment exercise, the area met all three of the legislative conditions, but only partially, and it is therefore a matter of fine judgement whether the area should be included within the Park. The arguments against inclusion of the area point to

the disadvantages of including marginal areas which dilute the overall identity of the area. On balance, however, we were persuaded that the area comprising the two straths forms an important part of the approaches to the central Cairngorms massif, and inclusion would help address some of the socio-economic and management needs of the area, while adding to the diversity of the Park.

4-50 The case for inclusion of Ben Rinnes (sub-unit 6) is weakened by the distance of this area from the central Cairngorms massif, although it is noted that the two areas have some features in common. The limited complexity of the management issues which affect this hill suggest that a targeted initiative, focussing on visitor management, would address these concerns more efficiently than inclusion within a National Park.

Reporter's Advice

The Park should include Strath Avon and Glenlivet areas (sub-unit 7). Further consideration of the most appropriate boundary will be required in the vicinity of Bridge of Avon and to the north of Glenlivet.

The Ben Rinnes area (sub-unit 6) should not be included within the Park.

SNH advice as natural heritage adviser

SNH advises that the case for inclusion of Strath Avon and Glenlivet is not strong on natural heritage grounds alone.

Deeside and Donside

Comments generated

4-51 Upper Donside and Deeside represent the eastern flanks of the potential Park area (principally sub-units 8, 9, 10, 28 and 29).

4-52 Upper Donside (sub-unit 8) did not attract a particularly large volume of specific comment during the consultation exercise. Discussion at a public meeting in Strathdon suggested a general preference for the larger Park options, indicating that there was some local support for inclusion of the area. Various supporting arguments were also advanced

through the wider consultation exercise, including the perceived role of the area as one of the straths which provide the Cairngorms area with its classic identity; the benefits of including such areas for management purposes to provide a 'buffer' for the mountain core; and the need to ensure an overall balance of land-use and socio-economic activity within the Park. There was also some specific support for inclusion of the whole of Morven, primarily on grounds of recreational value and topographic continuity with high ground to the west. A few respondents argued for exclusion of the area, suggesting that the quality of the area's natural heritage, including its recreational resources, was not distinguished, and was not comparable to other straths around the Cairngorms. The area's inclusion was also considered by some to have relatively few management benefits. The contribution of the area to the character and identity of the Cairngorms was disputed, and many felt the area to have more in common with the more intensively managed lowlands to the east.

4-53 The inclusion of Tarland and the Howe of Cromar area (sub-unit 29) attracted a significant level of support, with several respondents citing the rich archaeological heritage or the need to maintain social links with adjoining areas. The balance of opinion, however, seemed to favour exclusion. A significant number of contributors, including the local landowners, variously argued that the area was of different character to the remainder of the Cairngorms area, had stronger links to the Aberdeenshire lowlands, or simply that there was little local enthusiasm for inclusion. Several respondents considered that the area was not a significant tourist attraction, holding little interest for visitors.

4-54 The range of preferences for the overall area of the Park suggests a strong consensus that Upper Deeside, west of Ballater, and the headwaters of the Don should be included although this view was not entirely unchallenged. The mid-Deeside area, between Ballater and Dinnit, taking in the southern slopes of Morven, Glen Tanar and moorland rising to Mount Keen attracted much specific comment, which revealed a strong measure of support for inclusion in the Park. This view was echoed by local consultation in Ballater and was largely based on the quality of the natural heritage, including the National

Nature Reserves of Dinnet and Glen Tanar. A number of respondents, including sportscotland, also cited the importance of the area for informal recreation, including the approaches to Mount Keen and Glen Tanar itself. Several contributors felt that the eastern gateway to the Park would sit well within this area, for example at Dinnet.

4-55 The adjacent areas of Ballogie and Birse, and Finzean (in sub-units 9 and 10) also attracted a good deal of comment, with less obvious consensus. The very thorough community-led consultation in Ballogie and Birse indicated strong support for inclusion, but equivalent consultation in Finzean concluded, by a small margin, that the community would rather remain outside the Park. The view was that Finzean is distinct from the Cairngorms in terms of landscape, outlook and aspirations, and with very little economic dependence on tourism. A detailed submission from Birse Community Trust argued for inclusion of the whole of Birse Parish, drawing attention to the area's natural heritage value, and the rich archaeological and wider cultural heritage, including the historic Fungle and Firmouth rights of way, and the unique status of the Trust itself. This diversity of views about inclusion of the area was also reflected in the views from further afield. A number of respondents argued for inclusion of the area on a similar basis to the adjacent Glen Tanar, sometimes citing the Forest of Birse as an important natural and cultural heritage feature. However, a significant number of consultees argued that this area was too remote or distinct from the area of strong Cairngorms identity to warrant inclusion.

4-56 The area immediately around Aboyne (sub-unit 28) also attracted many comments, revealing a marked and fairly even polarisation of opinion. Many felt that Aboyne was of lowland character, and too remote from the central core, with one local resident saying that the Cairngorms felt like 'somewhere we have to go'. Other contributors expressed the related view that the area looks east and has links to the Aberdeen commuter belt. The case for inclusion of Aboyne included the view that this town would make an attractive Park gateway. A few correspondents also argued that this managed landscape complemented that of Upper Deeside, and was itself of intrinsic value.

SNH view as natural heritage adviser

4-57 With a few specific exceptions, the Strathdon area is not of particularly high natural heritage value. The landscape of the area is characteristic of the straths which surround the Cairngorms massifs, but it has been significantly modified by extensive coniferous plantations on hill tops. The opportunities for enjoyment of the natural heritage are relatively few at present, by comparison with other areas. SNH does not therefore see a convincing case on natural heritage grounds for inclusion of upper Strathdon.

4-58 The Tarland and Aboyne areas are generally not of high natural heritage quality and are of a landscape character not readily identifiable with the Cairngorms. The natural heritage in these areas is also in less urgent need of the integrated management framework which a Park would provide.

4-59 The natural heritage of Birse parish is of considerable value, particularly with respect to the continuity of moorland and pinewood habitats with Glen Tanar. The landscape of this area is, however, broadly intermediate between upland and lowland north-east Scotland. There is only limited coherence with areas of strong Cairngorms identity. The special needs of the area, in terms of the natural heritage, may be addressed by other mechanisms and do not provide a strong case for inclusion in the Park by comparison with other areas. Although the case is marginal, we do not consider that the natural heritage of Birse conforms sufficiently closely to the legislative conditions to favour inclusion on natural heritage grounds.

Discussion

4-60 The case for inclusion of Strathdon (sub-unit 8) is finely balanced and in many respects is very similar to the Glenlivet and Strath Avon area (sub-unit 7) discussed above. Decisions on inclusion of these two areas require a consistent approach. In the assessment exercise, the Strathdon area was judged to meet all three of the legislative conditions to a partial extent which, taken together, provided a strong case for inclusion within the Park. The strath is relatively

narrow in its upper reaches and the distribution of housing in the area is largely along the bottom of the glens, making the settlements linear and dispersed. Coming to a decision about how far down the strath to bring the Park boundary, without splitting communities, is likely to be problematic.

4-61 The area comprises one of a number of glens, including the Dee and Avon, which radiate outwards from the central Cairngorms massifs. Although the predominance of relatively even-aged commercial coniferous forestry has detracted from the landscape quality of the area to some extent, the area has a distinctive character. In terms of special management needs, there are certainly opportunities for the enhancement the natural and cultural heritage of the area, and also considerable potential to promote the enjoyment of these features in a way which brings social and economic benefits to the area. On balance therefore, we believe that National Park status would help to address the special needs of the area and it should be included within the Park as far east as, and including, Glen Buchat.

4-62 The overall balance of opinion and the area assessment suggest that the Tarland area (sub-unit 29) should be excluded as it does not meet the legislative conditions, particularly those relating to the identity of the area and the special management needs.

4-63 There is clear support from consultees for including mid-Deeside to the east of Ballater, taking in Dinnet and Glen Tanar (in sub-unit 9). This conclusion is strongly supported by the assessment of the area against the legislative criteria from the Act. There was less agreement on extending the Park to the east beyond Dinnet. The area immediately around Aboyne did not rate highly against any of the three conditions from the Act, and it should be excluded.

4-64 There is a strong case for treating the Ballogie and Birse, and Finzean areas (in sub-units 9 and 10), all of which fall within Birse Parish, as consistently as possible. Although we note the considerable local support for inclusion of Ballogie and Birse, we concluded that these areas do not contribute significantly to the distinctive identity of the Cairngorms and that they relate more strongly to the NE lowlands. In addition, the special management needs of the area are being addressed through the Birse Community Trust. While there is much commonality between the objectives of the Trust and a National Park, we do see that there is strong case for inclusion of the area that it covers within the Park. The role of the Park Authority in linking to adjacent areas should, once again, be emphasised, along with the continuing need for support from the relevant bodies for initiatives such as the Birse Community Trust.

Reporter's Advice

The Park should include the Strathdon area (sub-unit 8) as far east as, and including, Glen Buchat, mid-Deeside (sub-unit 9), including the settlement of Dinnet, and the whole of Glen Tanar. Further consideration of the most appropriate boundary will be required in the vicinity of Logie Coldstone and Dinnet.

Ballogie and Birse, Finzean (in sub units 9 and 10), Aboyne (sub-unit 28) and most of the Howe of Cromar area (sub-unit 29) should not be included in the Park.

SNH advice as natural heritage adviser

SNH advises that the case for inclusion of the Strathdon area is not strong on natural heritage grounds alone.

The Angus Glens

Comments generated

4-65 Many respondents commented specifically on the Angus Glens (sub-units 11-14). The strongest overall view was that at least part of the glens should be included within the Park and various supporting arguments were advanced for this. The quality of the natural heritage was often highlighted, including the fine landscapes of upper Glen Clova (sub-unit 13) and Glen Esk (sub-unit 11), the botanical richness of Caenlochan, and the recreational resources of the area. Some respondents also argued for inclusion of the headwaters of these rivers on grounds of integrated catchment management.

4-66 A few respondents suggested that the Park should extend further east, taking in Fettercairn and the Cairn O'Mount, in part because of the geological interest of this area. A larger number of respondents, including Angus Council and sportsScotland, considered that the Park should only take in the heads of the glens. These were variously seen as important in terms of natural resources and recreational opportunities and were considered to be 'Cairngorm-like' areas. A number of contributors expressed the view that only these areas were really necessary for adequate recreation management. There was little consensus on the preferred cut-off point, although several contributors suggested the line of the Highland Boundary Fault which crosses Glen Clova at Dykehead.

4-67 Much local support was expressed for inclusion of the Angus Glens, with respondents citing perceived visitor management and economic benefits or, conversely, concern about loss of existing tourism if the area were excluded. A number of contributors, including the Farming and Wildlife Advisory Group and the National Farmers' Union of Scotland, encouraged the inclusion of lower-lying farmland to increase the diversity of land-use within the Park and to safeguard rural employment. Local consultation in Kirriemuir also revealed strong support for inclusion of the area with local business interests seeing an opportunity to raise the profile of the town and reverse recent, adverse economic trends. This case was reinforced by Angus

Council who, while not supporting inclusion of these communities within the Park, considered that Brechin, Kirriemuir and Edzell should assume "gateway" status.

4-68 Only a small number of respondents believed that the Angus Glens should be entirely excluded from the Park. This view was based on various perceptions, including views that these areas are of different character to the Cairngorms, are well-managed already, or would experience a large influx of visitors with disruption of land management. A more substantial number of contributors, however, drew a distinction between the upper and lower reaches of the glens, arguing that the farmed character of lower straths was out of keeping with the proposed Park. This distinction was also extended to Kirriemuir and other towns at the foot of the glens, which were seen as having little role in provision for, or management of, visitors. There was also a view that many communities in this area look outwards towards the Mearns and Dundee and lack strong cultural or economic links to the mountain core. Some contributors felt that these towns were simply too far from the Cairngorms to be included.

SNH view as natural heritage adviser

4-69 As statutory natural heritage adviser, SNH notes the exceptional importance of the former extent of Caenlochan National Nature Reserve for alpine plant communities. The landscape of the upper parts of the Glens and the plateau area is very similar in character to the granite plateaux of the central Cairngorms, and the area north west of Glen Clova falls within the Deeside and Lochnagar National Scenic Area. Several of the glens are of considerable recreational value, with many popular hills and noted historic routes. The integrated management framework offered by a National Park could offer substantial benefits to the natural heritage.

4-70 The lower parts of the Angus Glens contain some significant birchwoods and the land in between them has significant areas of open moorland. These features, while of considerable local value, are not outstanding in natural heritage terms. The farmland to the south of the

Highland Boundary Fault is not of significant natural heritage value.

Discussion

4-71 There is a clear balance of opinion in favour of including the upper Angus Glens (in sub-units 11, 13 and 14), which are of strong upland character, high natural heritage value and considerable recreational importance. The lower reaches assume an increasingly managed, agricultural character, culminating in lowland landscapes which have little in common with the Cairngorms. There is much less clear support for the inclusion of these areas.

4-72 The potential benefits of a diversity of land use within the Park are acknowledged, as is the need to maintain a working countryside. The inclusion of large areas of lowland agricultural land would, however, raise distinct management issues with their own resource implications, shifting the focus of the Park. The marked contrast in land use and economic activity in the lower reaches of the Angus Glens suggests that the

interests of these areas might be better served by other mechanisms, rather than by inclusion in a National Park.

4-73 The communities of these areas are generally dispersed, with continuous sparse settlement extending up the glens from the adjacent lowlands. It is therefore difficult to define a threshold at which a boundary might be drawn without dividing these communities to some extent. A relatively limited extension of the Park into the Angus Glens could encompass the areas of greatest value to the natural and cultural heritage and for recreation while minimising such divisive effects. We concur with the view that inclusion of the upper glens is sufficient to address the key management issues, and note that the National Parks Act also allows Park Authorities to support initiatives outside the Park area in pursuit of the National Park Plan. Under these circumstances, the views of adjacent communities should be carefully considered in decision making by the Park Authority, with particular attention paid to participation and representation issues.

Reporter's Advice

The Park should include the heads of Glens Esk, Clova, Prosen and Isla, (in sub-units 11, 13 and 14) which are of strong mountain character, but should not extend into the adjacent agricultural lowlands. It would seem appropriate for the Park boundary to cross these glens in the vicinity of the Tarfside (following the Firmounth), Wheen, Glenprosen Lodge, and Auchavan respectively.

The Park Authority should liaise closely with Angus Council and other relevant bodies to maximise the positive and minimise negative impacts on adjacent areas, including the lower parts of the Angus Glens and Kirriemuir.

SNH advice as natural heritage adviser

SNH supports this recommendation.

Highland Perthshire and Drumochter

Comments generated

4-74 The south-western sector of the potential Park area falls within Highland Perthshire (sub-units 15-20), and this extensive area attracted much comment. The key issues appear quite distinct in different areas, with varying degrees of consensus on the case for inclusion.

4-75 Rannoch and Tummel (sub-units 18 and 20) lie at the extreme south-west of the suggested area. Very few contributors specifically advocated their inclusion but, when they did so it was often as a prerequisite for including Loch Rannoch, the Black Wood of Rannoch or Schiehallion, rather than because of the quality of the areas themselves. A few contributors also noted the importance of tourism and outdoor recreation to the local economy. The exclusion of these areas was advocated by numerous respondents, usually because they lacked the distinct identity of the Cairngorms and were remote from the central massifs, or because the natural and cultural heritage were said to be undistinguished.

4-76 Much debate was focussed on Pitlochry (in sub-unit 18) and here opinion was clearly divided. Public meetings organised by Pitlochry and Moulin Community Council suggested a measure of support for inclusion, and a clear view that the town could have a major role to play in the Park's future because of its size, location and existing facilities. A number of contributors to the wider consultation, including Perth and Kinross Council and tourism interests, also favoured inclusion. Arguments in support of this view included economic benefits through the provision of accommodation and services for visitors, with several respondents suggesting that Pitlochry would make an appropriate southern gateway to the Park. The exclusion of Pitlochry was also advocated by a large number of contributors, usually because of perceptions that the town has a distinct character and identity of its own and that the community looks to the south and west. A number of respondents felt that Pitlochry already has a thriving tourism industry, and that the social and economic benefits which a Park may bring were more in need elsewhere: therefore, the town should be excluded.

4-77 The range of views on Blair Atholl (in sub-unit 17) echoed those expressed in relation to Pitlochry, and many respondents considered the two together. Perth and Kinross Council suggested that a National Park "gateway centre" be established at Blair Atholl and a few other respondents expressed similar views, noting the village was at the foot of Glen Tilt, an historically important and currently popular access route to the mountains. By contrast, other contributors felt that the Park should avoid the area altogether, sometimes suggesting that Drumochter should be the point of entry from the south. Local consultation in Blair Atholl and Struan also revealed a diversity of views on the Park area, with perhaps a slight preference for inclusion of this community. Greater doubts about the benefits of inclusion were evident in Killiecrankie and Fincastle, with a majority in favour of a small Park which would be sufficiently distant to prevent any knock-on effects on the community.

4-78 Local consultation in Highland Perthshire was supported by an opinion survey undertaken by Highland Perthshire Communities Partnership across areas to the south of Killiecrankie. This did not indicate a strong desire for that area to be included in the Park, as it was seen as having a separate identity, itself of considerable value in promoting local businesses. This study also indicated that many local residents preferred the area to be well outside the Park, because of concern that any adverse effects on peripheral areas would be amplified in Highland Perthshire, which would lie between the two proposed National Parks.

4-79 The mountain hinterland of the Forest of Atholl (sub-unit 17) also attracted diverse opinions. A significant number of contributors considered the area to be of national importance for the natural heritage, citing features such as Beinn a'Ghlo and the Drumochter Hills SSSIs, along with upland raptor populations. Many also felt that the area conforms to the second condition in the Act, sharing a distinctive character and coherent identity with the central Cairngorms, although this view was by no means universal. The greatest disagreement, however, seemed to focus on the third of the legislative criteria. Many respondents cited practical benefits which might flow from designation, including integrated management of the Tilt

catchment and the management of deer and recreational use. Others disagreed with this perception, arguing that management problems are better addressed by other means or that no such problems exist.

4-80 The western half of the Upper Garry catchment (sub-unit 19) lies to the west of this extensive tract of hill country across the A9. The case for inclusion of this area was based primarily on the landscape and ecological value of the Drumochter Hills, and the opportunity for integrated management of both the catchment and the visual envelope around the A9 corridor. Others felt that this area was of distinct ecological character or was too remote from the central Cairngorms, sometimes arguing that the A9 transport corridor made a logical if somewhat pragmatic boundary within a continuous gradation of Cairngorms character extending outwards from the core. Several contributors also felt that much of this area is of unexceptional landscape quality, implying at least partial exclusion on natural heritage grounds.

4-81 The areas to the north west of Spittal of Glenshee (sub-unit 15) and east of Gleann Fearnach and Kirkmichael (sub-unit 16) attracted less specific comment. A meeting at Kirkmichael suggested that the latter area should be included, largely because of perceived benefits for land management and the wider rural economy. In the wider consultation, however, there appeared to be more support for the inclusion of Spittal of Glenshee and Glas Tulaichean (sub-unit 15) than the moorland and enclosed farmland to the south. Points in favour of the Kirkmichael area included the quality of the natural heritage, with native woodland remnants and moorland raptors. Arguments for exclusion of the area centred on the distinct character of the area, by comparison with the central Cairngorms and its surrounding straths, and the perceived adequacy of existing management mechanisms.

SNH view as natural heritage adviser

4-82 As statutory adviser on the natural heritage SNH notes the significant natural heritage value of the Glas Tulaichean, the Forest of Atholl, Beinn a' Ghlo, Drumochter Hills and Glen Tilt areas. Although the landscapes and ecosystems of

these areas differ in some respects from the central granite plateaux, they are of outstanding natural heritage value. The integrated management of these resources could offer significant benefits both to the areas themselves and to the adjacent mountain massif, notably through restoration of hill tracks and adjustments to grazing management to allow woodland and scrub regeneration. SNH supports inclusion of the above areas within the Park on natural heritage grounds.

4-83 The more southerly and western parts of Highland Perthshire are of national importance for their natural heritage. However, these areas have a distinct landscape and ecological character which is quite different from the Cairngorms massifs and their immediately surrounding straths. Therefore SNH does not support their inclusion within the National Park on natural heritage grounds.

Discussion

4-84 Assessment against the criteria in the National Parks Act and the balance of opinion from the consultation exercise, suggest that Tummel and Rannoch areas (sub-units 18 and 20) should not be included within the Park. These areas do not exhibit strong identity with the Cairngorms, and the National Park is not an appropriate mechanism to deal with their special needs.

4-85 Pitlochry is an attractive town with strong local character, a well-established tourism industry and a strong degree of economic dependence on the natural and cultural heritage. The town is nonetheless far removed from the central Cairngorms massif and has a distinct southward and westward orientation, making claims for Cairngorms character and identity rather tenuous. Pitlochry also has a rather indirect relationship with the Cairngorms area in terms of visitor management, and is frequently visited as a destination in its own right or en route to the Rannoch and Tummel areas. These arguments suggest that Pitlochry should not be included in the Park. The concerns expressed by some local residents are nonetheless recognised, and it is important to emphasise the role of the Park Authority in liaising with surrounding areas to minimise adverse effects.

4-86 The Forest of Atholl, Blair Atholl and Drumochter (in sub-units 17 and 19) raise more complex questions. This area has much in common with Gaick to the north (sub-unit 4), and there is a valid argument that all of these areas should be included or excluded as a single unit. The most compelling arguments in favour of inclusion would appear to be the high quality of much of the natural and cultural heritage and also the principle that inclusion of such an area is desirable around the most sensitive mountain massifs. Although Blair Atholl shares many similarities with Pitlochry, the town is more closely linked to the Cairngorms as a direct access point to Glen Bruar, Glen Tilt and Beinn a'Ghlo. The Drumochter Hills are also of particular value for outdoor recreation and nature conservation, and are of similar character to the Forest of Atholl. Although several respondents identified the road and rail corridor at this point as an appropriate line to define the gradual transition from the Cairngorms to the mountains of the west, inclusion of the Beinn Udlamain mountain group to the west of the A9 would provide a more satisfactory entrance point to the National Park

for those visitors arriving from the south and may help address recreational management issues on these hills.

4-87 The inclusion of Blair Atholl would nonetheless raise some difficult practical issues. As in the Angus Glens, the communities in this area are quite dispersed, with scattered development along the Garry to east and west, and the boundary could not easily include them in their entirety. Inclusion of Blair Atholl would also invite a natural continuation of the boundary along the western Garry watershed or the A9 corridor. We concur with the arguments against inclusion of the whole watershed and would re-emphasise that integrated catchment management will inevitably need to be addressed by the Park Authority in liaison with other bodies. However, the A9 corridor is also a less than ideal boundary, taking in some undistinguished but highly visible ground and creating a rather prolonged period of entry to the Park for visitors approaching from the south. In addition, extension of the Park to Blair Atholl would bring the boundary close to Killiecrankie, against the specific preference of local residents. In this instance, as elsewhere around the Park margins, it is important to stress the responsibility of the Park Authority to minimise adverse effects on surrounding areas by close partnership working.

4-88 The arguments for inclusion of the Kirkmichael area have been relatively muted, and many of the considerations noted in relation to the lower Angus Glens (above) are equally applicable here. The undoubted very rich cultural heritage of the area, which includes many prehistoric and post-medieval sites, is acknowledged, as is the natural heritage value of the area's moorland habitats. However, much of this area is of transitional character between the higher ground to the north and lowland mixed agricultural landscapes to the south, and does not conform easily to the character and identity of the Cairngorms. The more mountainous area to the immediate north, including Glas Tulaichean and Carn an Rìgh, is of stronger Cairngorms character and has close topographic and recreational links to those parts of the mountain core which are commonly approached from Glen Ey. The area to the south of Spittal of Glenshee also provides a good natural entrance point to the Park.

Reporter's Advice

The Forest of Atholl (sub-unit 17) should be included in the Park along with the Beinn Udlamain mountain group to the west of the A9 (in sub-unit 19). Blair Atholl should be included, but the further consideration should be given to the precise boundary in this area.

The Rannoch, Tummel, Pitlochry and Ben Vrackie areas and the ground to the south and west of Dalnaspisdal Lodge (sub-units 18, 20 and parts of 17 and 19) should not be included in the Park. The Kirkmichael area should be excluded but the park should take in Glas Tulaichean and Spittal of Glenshee (in sub-unit 15) to the north.

SNH advice as natural heritage adviser

SNH supports this recommendation but notes that only the inclusion of Glas Tulaichean, the Forest of Atholl, Beinn a' Ghlo, Drumochter Hills and Glen Tilt areas could be supported on natural heritage grounds alone.

Summary of recommended Park area

4-89 Implementation of all the reporter's advice described above would lead to a National Park covering the area shown in Map 3. The Park would include the two Cairngorms massifs and the surrounding hill ground, straths and glens along with many of their communities. This area is largely intermediate between Options A and B from the consultation document, although closer to the latter. The area of the Park would be more than 4,500 km² and we estimate that there would be around 16,600 people resident in the Park. The Park would be by far the largest National Park in Britain (Table 4-3) although it is significantly smaller than the Cairngorms Partnership area.

Table 4-3: Relative size and population of the proposed National Park

	Area (km ²)	Estimated population
Proposed Cairngorms National Park	4580	16600
Cairngorms Partnership Area	6516	22000
Proposed Loch Lomond and the Trossachs National Park	1764	13825
Lake District National Park	2292	42239
North York Moors National Park	1432	25500

4-90 Ministers will wish to consider the size and location of the Park with reference to the effective and efficient administration by the Park Authority of its functions, and delivery of its purpose. On balance, while a smaller Park may be justifiable on natural heritage grounds alone, we consider that the Park we have described above would be more appropriate to the four aims of National Parks in Scotland. Conversely, for a larger Park, the Authority may be disadvantaged by having less clear focus, a reduced sense of identity, and the additional administrative complexity of a larger area. The area we have recommended would provide a reasonable degree of separation from the Loch Lomond and the Trossachs National Park, and should minimise any undesirable effects on intervening parts of Highland Perthshire. The management of peripheral effects will, however, require careful consideration by the Park Authority and the appropriate local authorities.

4-91 The concept of zoning has been widely applied in National Parks and other protected areas elsewhere, and was frequently mentioned during the consultation exercise. The Cairngorms are particularly amenable to such an approach, with a relatively remote mountain massif surrounded by populated straths, and the recommended area has been developed with this in mind. The detail of any zoning system should be developed by the Park Authority, on the basis of further widespread consultation associated with the Park Plan.

4-92 The recommended area of the Park is primarily focussed on areas of national value for their natural and cultural heritage, and which are closely identified with the Cairngorms. With appropriate management and attention to the special needs of the area, we consider that this Park could inspire widespread recognition and acclaim among both residents and visitors.

Establishment of the detailed Park boundary

SNH consultation document

4-93 As noted above, the consultation exercise was primarily focussed on the general area of the Park rather than the detail of the boundary which will encircle it. If Scottish Ministers decide to proceed with the designation, a suggested boundary will be required for the draft Designation Order. We suggested in the consultation document a number of guiding principles which could be used to determine the exact boundary, and sought comment on them.

Comments generated

4-94 Most of the respondents who addressed this issue were in broad agreement with the suggested principles, but a number of points attracted varying amounts of comment.

4-95 Many respondents, including the Scottish Environment Protection Agency, supported the proposal to use water catchments, where possible, as Park boundaries. These were generally seen as forming reasonably clear natural thresholds, but support was also frequently linked to the

desirability of integrated catchment management. Many contributors also cautioned against the use of rivers and lochs as boundaries, arguing that land use and development on both sides of the valley could affect landscapes and ecosystems inside the Park, or simply that both sides are usually of similar character. A number of contributors suggested that individual straths should be within or outside the Park. A small but significant number of respondents disagreed with the use of watersheds, arguing for more extensive definitions of the boundary to prevent inappropriate development near to skylines, which will often be highly visible from within the Park.

4-96 There was strong agreement with the suggestion that towns and villages should not be divided by the boundary, and several respondents widened this to include more dispersed communities. Numerous respondents also emphasised the importance of consultation, particularly at local level, during the development of a detailed boundary.

4-97 We suggested in the consultation document that land ownership should not be a major factor in the determination of the boundary, although land management should be considered. This point attracted a good deal of comment and a significant number of respondents, including the Timber Growers' Association, the Scottish Landowners' Federation, and several individuals considered that the subdivision of ownership units might create unacceptable administrative complications. The importance attributed to deer management was reflected by several suggestions that the boundary should reflect patterns of deer movement, perhaps following Deer Management Group boundaries.

4-98 The suggested principles presumed against the use of relatively 'transient features' such as field margins, paths and roads, and this point also attracted a fair amount of comment. A significant number of respondents noted that roads are permanent features for most practical purposes and are readily recognisable on the ground, thus constituting appropriate boundaries. A slightly smaller number of contributors were opposed to the adoption of roads on grounds of 'artificiality' and because of possible planning difficulties where one side of the road falls outside the Park.

4-99 A variety of other issues were raised by smaller numbers of respondents, including the proposal of "porous" or "feathered" boundaries to encourage flexible management at the margins of the Park. A very small number of contributors suggested that the creation of 'islands' of undesignated land within the boundary would lead to management problems and should generally be avoided.

4-100 A few contributors suggested changes to the overall process by which the detailed boundary might be developed, but there was no consensus of views on this point. Suggestions included the exclusive use of school catchments, community council boundaries or, to simplify electoral arrangements, polling district boundaries. It was also suggested that 'existing' boundaries should be used throughout as a point of principle. A very small number of respondents disagreed fundamentally with the intended approach, suggesting the establishment of a provisional boundary for a trial period, or that boundaries are unnecessarily divisive and should be avoided altogether.

Discussion

4-101 There is clearly a strong feeling that water catchments make logical boundaries and that watercourses, conversely, are unsatisfactory. In general we would agree with these views, but would note that no one principle will suit all locations. The exclusive use of water catchments would only allow the boundary to be very crudely defined, often including areas which do not fulfil the legislative criteria for designation. We acknowledge concerns about inappropriate development just outside the Park, but would argue that this very real issue can and should be addressed by close working arrangements between the Park Authority and adjacent authorities.

4-102 We note the concerns expressed by some respondents about the subdivision of land holdings by the Park boundary, but would argue that careful attention to land management (as distinct from ownership) should be sufficient to minimise administrative complexity for land owners. In general, we would argue that different patterns of management will either correspond to

ownership boundaries or, where they occur within one ownership unit, will already be subject to different economic circumstances. This issue will clearly nonetheless require careful attention during development of, and consultation on, any potential boundary, and we would particularly acknowledge the importance of deer management.

4-103 We consider that the suggested principles should be broadened to ensure that individual communities as well as towns and villages are, where possible, either inside or outside the Park. We also accept the suggestion that the principles should include a presumption against the establishment of isolated islands of undesignated land within the Park boundary. We concur strongly with the importance of both local and wider public consultation as the detailed boundary is developed.

Reporter's Advice

On the basis of the consultation we have undertaken, we recommend that if Ministers choose to proceed to a draft Designation Order, the principles noted below should be applied during the development of a detailed boundary:

- **wherever possible the boundary should follow an easily distinguishable and permanent natural feature;**
- **where administrative boundaries follow such features, they should be adopted;**
- **towns and villages and, where possible, their surrounding communities, should normally either be wholly included within or excluded from the National Park;**
- **the nature and location of public or private land ownership in the area should generally not be a determining element for the National Park boundary because this may be subject to change, but consideration should be given to the potential impact of the National Park boundary on land management operations;**
- **transient features such as field boundaries, paths or roads, all of which are likely to change in the future, should be avoided, where possible;**
- **when field boundaries, paths or roads are used because of the absence of other features, they should be wholly included within the National Park area;**
- **where watercourses are used, they should be wholly included in the National Park although consideration should be given to the dynamic nature of many watercourses which generally make these features unsuitable for the definition of legal boundaries;**
- **the boundary should be prepared on Ordnance Survey maps at 1:10,000 scale and should be accompanied by a written description; and**
- **the boundary should be subject to further detailed consultation.**

Wherever the final boundary is defined, it will be vital for the National Park Authority to work with local authorities to minimise any adverse impact on the land and communities outwith the boundary.

SNH advice as natural heritage adviser

SNH supports this recommendation.