

CAIRNGORMS NATIONAL PARK: ECONOMIC ACTION PLAN 2019-2022

Summary of Consultation Responses

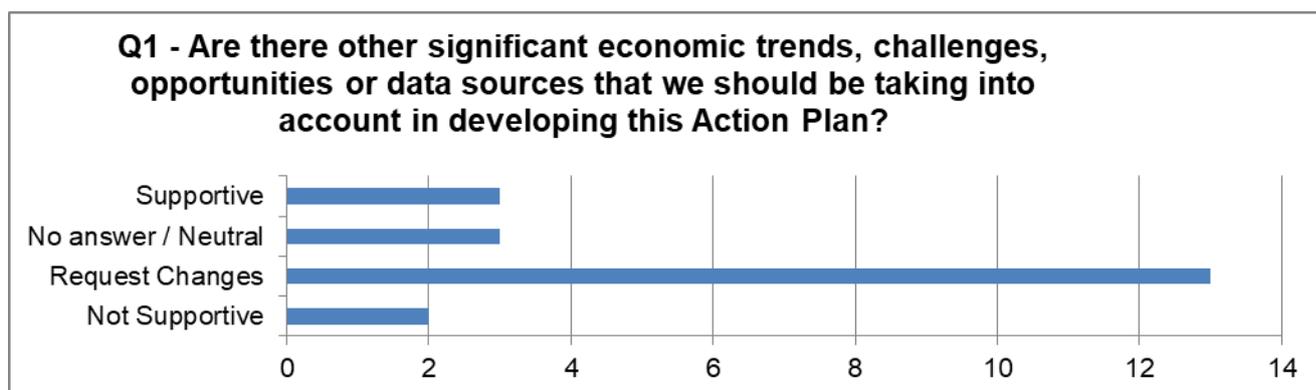
I. Introduction

- I. A total of 21 written responses were received and these are summarised in this report under headings that related to each of the three questions that were asked. The respondents are listed below.

Ref	Name/Organisation
AC	Aberdeenshire Council
AE	Alvie Estate
AGCT	Aviemore and Glenmore Community Trust
BNG	Bòrd na Gàidhlig
BSCG	Badenoch and Strathspey Conservation Group
CC	Cairngorms Campaign
CBP	Cairngorms Business Partnership
FSB	Federation of Small Businesses
GB	Gordon Bulloch
GBA	Grantown Business Association
HIE	Highlands and Islands Enterprise

Ref	Name/Organisation
HC	Highland Council
NK/PW	Nick Kempe/ Parkswatchscotland
RT	Rothiemurchus Team
RSPB	Royal Society for the Protection of Birds Scotland
SCNP	Scottish Campaign for National Parks
SE	Scottish Enterprise
SLE	Scottish Land and Estates
SNH	Scottish Natural Heritage
TGDT	Tomintoul and Glenlivet Development Trust
WTS	Woodland Trust Scotland

2. Trends, Challenges, Opportunities or Data Sources

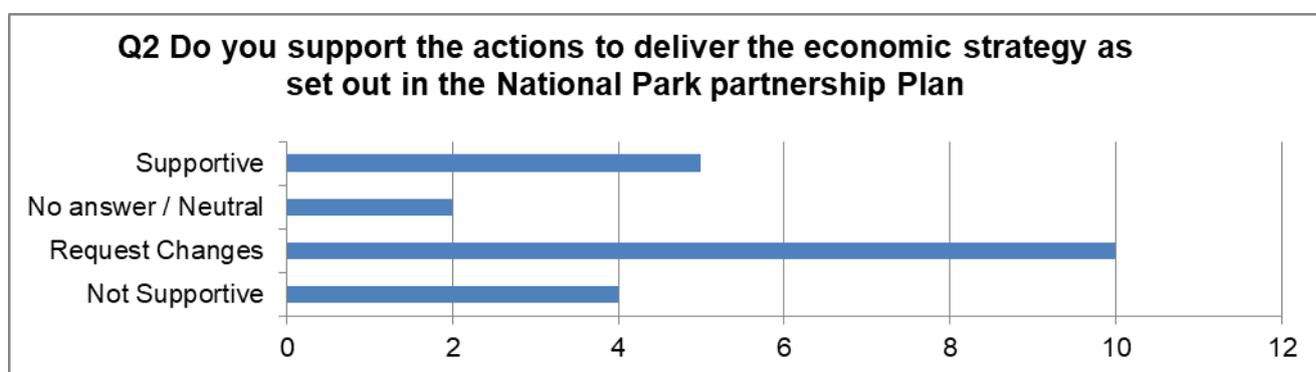


2. The following were suggested as additional data that should be utilised further:

Natural heritage data improvement should/could be an aim (for example the Ancient Woodland Inventory (AWI) is unreliable)	WT, RSPB
2011 Census	SLE
Economic Value Added	CBP
Economic, Social and Environmental Contribution of Landowners in the CNP (2013 Report) can help identify some of the economic priorities of land-based businesses in the Park	SLE
Business Barometer	SLE
Numbers using food banks	RT
House prices (e.g. House prices and rents by travel to work area and house type (excluding detached homes)...expressed as a % of the average for Scotland	RT
Number and frequency of homes advertised to rent as long term/permanent homes	RT
Proportion of affordable homes that provide a fair opportunity for people in local jobs to rent or buy.	RT
Number of suitable open market homes to rent and buy that are lived in by people in local jobs where they don't need a car to travel to work	RT
Business premises availability and rents	RT
Time taken to fill an advertised job	RT
Permanent/seasonal employment and average length of employment	RT
Outcomes achieved from support for Forestry, Farming and Heritage land use and the levels of public support where applicable	RT
TGDT happy to provide its data on visitor numbers etc.	TGDT
ScotPHO Health and Wellbeing Profiles	SLE
Improvement Service provides a range of data and analysis tools (including a community profiler, interactive mapping of Scottish Neighbourhood Statistics data)	SLE
Local Government Benchmarking Framework	SLE
NOMIS	SLE
Scottish Household Survey – e.g. social justice and transport	SLE

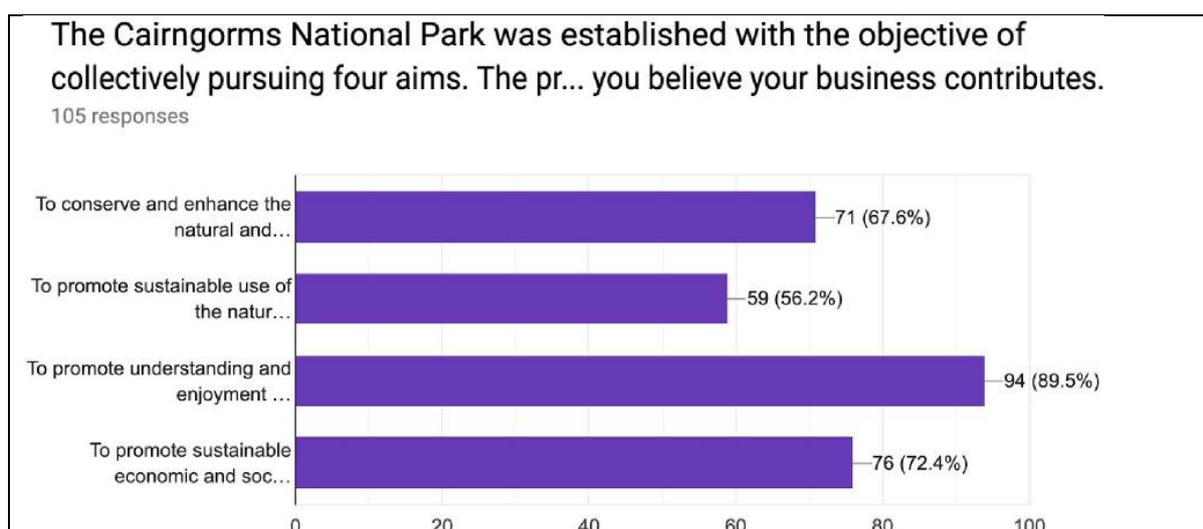
SIMD (index of deprivation based on: income; employment; housing; health education; skills and training; geographic access to services and telecommunications; and crime)	SLE
Scotland's statistics (wide range of economic related data mostly at a variety of different geographies. It includes figures on employees by industry, business sites by industry, earnings, labour market indicators and a variety of benefits data)	SLE
% employment in retail should be included	GBA
Rural payments and data provided through the EU/others for nature conservation projects	SCNP
Financial contribution (of) renewables to the rural economy	SCNP

3. The proposed Action Plan: Themes and Actions



Theme I. Building on Economic Strengths of the Park

3. During the consultation period the Cairngorms Business Partnership undertook a survey of members, asking which of the four Park aims each business felt it was contributing towards. The results are summarised below:



4. In their commentary on these results the CBP noted “The above demonstrates how businesses play a significant role in the collective delivery of all four statutory aims of the National Park. We recommend that the EAP is changed so that it recognises the contribution of the local economy towards such collective delivery and explains that a strong and sustainable economy supports all four statutory aims.” (CBP)

Tourism

5. Several respondents considered the plan over-emphasised tourism whilst greater resilience would be achieved with a more diverse and less seasonal economic base (SLE, AE, RT), particularly in the Aviemore area (RT). Some felt that investment should be focused on providing a more sustainable, all-season tourist economy, (one therefore less affected by snow conditions), with more emphasis on spend per visitor rather than increasing the numbers of visitors (which may eventually be detrimental to tourism itself) (AE, BSCG). One respondent suggests that related monitoring should include more than just visitor numbers (AE), whilst another considers there has been a lack of actions to make tourism sustainable (NK/PW).
6. Some felt that Motorhomes need to be better facilitated, suggesting commercial provision of serviced parking areas (RT, SLE) whilst others suggest a general **lack of visitor facilities** in terms of public toilets, parking, overnight camping facilities, visitor information, litter facilities and retail outlets (AE). Some suggested that where serviced camping space is provided then motorhomes, ‘inappropriate’ parking and wild camping should be actively discouraged/prohibited (AE, RT).
7. Action to encourage and promote **Adventure Tourism** is suggested for this (and/or the Tourism Action Plan) (SE, AGCT) – opportunities for collaboration/expansion may be provided with the ‘Extreme North’ project proposed by ‘Opportunity Northeast’ (this aims to capitalise on North East Scotland’s natural assets to make it a world-class destination for adventure sports tourism) (SE).
8. Planning and investment in the diversification/development of **ski centres** supported. However it is questioned who will lead the process, how we can build on the cultural heritage of ski areas and whether consideration should be broadened to include other visitor facilities and infrastructure (highlighted as a priority in CBP survey of members) (NK/PW, CBP).
9. Other suggestions from separate respondents:
 - a) **Ebikes** provide an opportunity, with facilities and the identification/creation of suitable trails suggested (ACGT).
 - b) Raising awareness of climate change and biodiversity loss amongst visitors along with what they can do to help (CC).
 - c) **Request Glenshee masterplan** (similar to that at Cairngorm) (AC).
 - d) Tourism and its impact are unevenly spread around the park (AE).
 - e) Infrastructure will be needed for new visitor attractions (AGCT).
 - f) **A9 dualling** might usefully incorporate work to include lay-bys and viewpoints (SNH).
 - g) A **transient visitor levy** would be detrimental, due to significant additional pressure on an already fragile local economy. Question raised as to the CNPA's opinion on this (CBP).

- h) **Sport and outdoors cultural heritage:** snow sports, other competitive sport and the centre of excellence for mountain training ... should be better marketed to ensure recreation in the Park is less seasonal and less dependent on a few areas/facilities (SLE).

Living Wage

10. Promotion of the living wage supported by some respondents (NK/PW, AC, GBA).
11. However others expressed reservations, considering the values behind the idea noble, but mandated adoption of a living wage misguided, as it does not recognise the inherent fragility and potential recruitment issues within the local economy (particularly in relation to retail, food and tourism). They suggested businesses should be able to consider the living wage based on their particular circumstances and that the living wage should be a measure of success for the economic strategy rather than an action (CBP, SLE).

Cairngorm Mountain

12. Two respondents suggested a specific objective to support sustainable development within the existing ski area (RSPB, AGCT). This may be supported by extending an old logging way up to Cairngorm, in order to providing a walking/cycling route and reduce car use (AGCT). However another suggestion was to stop actions in the EAP that add to emissions and exacerbate climate change/biodiversity loss – with gap solutions on Cairngorm Mountain being one example (CC).
13. Other suggestions from separate respondents:
- a) Cairngorm Mountain Ski uplift facilities are crucial to long-term economic sustainability and it is important to identify a viable way forward (HC).
 - b) SNH are keen to assist with, and advise on, the development of Cairngorm Mountain (SNH).
 - c) Cairngorm Mountain is an example of where public sector management and administration has failed (AE).

Land Use

14. CNPA should invest more/encourage investment in supporting and value adding farming and forestry products, renewable energy and utilising our natural resources such as minerals, farm/forest products and wild game. Agriculture policy must be tailored to ensure that enhancing productivity, business resilience and environmental benefit are top priorities (AE, SLE).
15. Rural development should include **diversification** to include sectors beyond tourism e.g. within farming/the land based sector and with more emphasis on renewables, quarrying and value added local produce (AC, AE).
16. **Woodland expansion should be linked to improving economic viability and employment** - trees should only be planted where they will integrate with existing land uses, and increase employment and economic activity over existing land use (AE, SLE).

17. Ongoing concern among SLE members that the **important role of sporting estates/field sports** to the economy and other NP aims has been under-valued and remain conspicuous by their absence in the proposed EAP (Multi-million pound capital investment comes to Cairngorms communities as a result of country sports eg the investors responsible for the Fife Arms and Gairnshiel Lodge redevelopments initially came to the area for stalking and grouse shooting) (AE, SLE).
18. EAP lacks any assessment of **quarrying** (AE, SLE).
19. Other suggestions from separate respondents:
 - a) A **Forestry challenge fund pilot** could be welcomed (although the grant available is currently insufficient to make a meaningful difference to larger schemes) (SLE).
 - b) Land Use Issues: should be assessed more fully as a main area of economic activity that CNPA do have influence over (NK/PW).
 - c) EAP has an **absence of actions relating to land-use** (SCNP).
 - d) **Land Use Strategy important re climate change** and public funding should be targeted on land uses that have a '**public good**' element (WT).
 - e) **Land managers** have insight and knowledge with regards to their rural businesses (which help communities thrive) (SLE).
 - f) **Presumption against large scale renewables** adversely affects renewable energy production over an area equivalent to 15% of Scotland's land area (AE).
 - g) EAP has **insufficient consideration of farming, forest production, renewable energy and processing of locally produced products** (AE).
 - h) **National Parks have huge potential for supporting new forms of land-use** (e.g. enabling the sort of ideas and projects developed by organisations such as Reforesting Scotland) (SCNP).
 - i) EAP should ensure that our core rural land uses remain economically viable (AE)
 - j) Additional data (such as data on rural payments/EU and others (payments) for nature conservation projects) could be utilised to inform **new models of countryside management**: e.g. reporting of grant funding for forestry fences could form basis for discussion on whether money might not be better spent on reducing deer numbers (SCNP).
 - k) **Rewilding** will not produce the goods and services we require and consume (AE).
 - l) **Waste** produced in the Park should be recycled in the Park (AE).
 - m) **Muirburn** contributes to climate change as well as other environmental and health impacts - EAP should promote land use changes that reduce muirburn (BSCG).
 - n) Further **clarity welcomed re any regionalised approach to future support of Agriculture** (SLE).
 - o) Moves by CNPA in relation to **hill tracks** will have a detrimental impact on hill farming, country sports and forestry activities some of which are already economically marginal (SLE).

Theme 2. Supporting and Attracting Businesses

Local and Other Businesses

20. **CNPA's (limited) resources should be re-focused to enable a thriving local economy**, given the importance of the local economy to the delivery of all four statutory National Park (NP) Aims (CBP, SLE, SE).
21. Other suggestions from separate respondents:
- a) **Rural Development Frameworks** – HC experience re land use planning, business development and housing policy can contribute to progressing rural development frameworks (HC).
 - b) **Convention of the Highlands and Islands (CoHI)** talent attraction group – HC is a member and can add value to action plan activities re supporting and attracting businesses (HC).
 - c) **New investment for example to provide infrastructure**: CBP recognise the ability and track record of the CNPA in leveraging significant investment. CBP are keen to work in partnership to leverage investment that improves some of the infrastructure challenges we face (CBP).
 - d) **Attracting New business sectors**: There is potential for diversification towards new/higher value sectors such as life science, creative industries, renewable energy and specialist technology (RT).
 - e) **Developing an entrepreneurial culture** - SLE welcome the inclusion of this programme of events to develop an entrepreneurial culture. Efforts could be strengthened by directly involving HIE/Scottish Enterprise to help deliver specific support to entrepreneurs (SLE).
 - f) Support for action re **supporting business with start-up and growth opportunities** - particularly those that fit with the ethos and traditions of the Park (such as food, timber, sport, learning, heritage, health, music and dance) and/or diversify the economy (RT).
 - g) **Lack of investment south of Aviemore** - CNPA should consider whether the A9 dualling might bring an opportunity for additional road services facilities in the area (HIE).
 - h) EAP should emphasise importance of **diversifying the economy** into new industries (HIE).
 - i) EAP should give more recognition to importance of technology and advanced engineering and have a **new theme of Technology, Data and Innovation** (HIE).
 - j) Public sector investment should not be used to develop businesses in competition with the private sector (AE).
 - k) EAP should acknowledge the situation of **small businesses** and the negative effects on them from larger developments that benefit from subsidies (BSCG).
 - l) The proposed **new distillery (at Craggan)** should be included in the capital investments examples (GBA.)
 - m) Suggest action on **new modes of business support**, progressed in partnership with business associations (GBA).
 - n) **VAT threshold** is a barrier to employment and growth - employment law is stifling recruitment in small businesses trading below the VAT threshold (GBA).

- o) Small businesses are unlikely to read EAP as they may feel **EAP is too high level** and does not relate to them (GBA).
- p) **Austerity cuts mean reduced or no small business support** (GBA).
- q) Economic, Social and Environmental Contribution of Landowners in the Cairngorms National Park (2013 Report) highlighted that direct income from activities carried out by respondents totalled £28.1M – although from 2013 the report is still a useful data source which can **help identify some of the economic priorities of land-based businesses in the Park**.
- r) **Sequencing of plans** - EAP could have informed the LDP if prepared in advance (CBP).
- s) **Economic Steering Group should include and listen to local business representatives**.
- t) Cairngorms **Business Barometer indicates low levels of approval for business support** (SLE).

Investment

- a) CBP members reported that attracting inward investment is a key factor for economic development. They recommend that through existing channels such as the CTP and **a new Economic Strategy group** we could look more strategically at the types of investment we want to see and work with public sector partners to target and attract those investments. CBP would be very willing to play a full and active role in this and with appropriate support from CNPA, would consider chairing an economic action group (CBP).
- b) CNP is too dependent on public investment and the role of private investment needs to be reviewed (although **Cairngorms Connect** is a rare example of helpful private investment) (NK/PW).
- c) AC keen to work with CNPA on **Invest Aberdeen** (the inward investment hub for the City Region) and the **Digital Boost programme** (AC).
- d) It is important to engage with the private sector and lever private investment (SE).
- e) Investment in infrastructure should support economic activities other than tourism (AE).
- f) Investment should include adequate access, facilities and training for forestry, renewable energy, processing and value adding local products (AE, CBP).
- g) The list of specific investments should be removed - whilst positive it has some notable omissions and is not relevant to any strategy moving forward (CBP).

Increasing the proportion of young and working age people

- 22. Support expressed for **actions to increase the young/working age population** – for example promotion of work/lifestyle benefits, economic opportunities and CNP as a place. Some actions could involve working with young people to maximise opportunities and address barriers to living and working in the Park. CBP consider that attracting Young people to stay/immigrate should be the primary focus of the economic strategy (SE, CBP, NK/PW).
- 23. The situation could be improved by utilising **CNP cultural capital** – for example the **special sporting culture/high number of Olympians per head**. This asset can be protected, enhanced and promoted to attract young people to live in the CNP

(aligned with the proposed theme 2 action 'Attracting talent and Investment'), whilst also fostering a culture of personal development, skills development, fitness and training. CBP recommend further research and consideration to better understand and articulate our cultural capital (for example regarding ski areas) - to ensure it can be conserved and enhanced for the benefit of the economy and communities (RT, CBP).

24. Concerns expressed that the increase in the (Working age) population has not kept pace with the growth in visitor numbers and this is likely to create issues with staffing/quality of provision (RT, CBP, SLE).

Theme 3. Education, Training and Skills Development

Climate Change Response

25. A number of respondents comment that **Climate change and Biodiversity loss (CCh/Bd) should have greater emphasis in plan and CNPA actions.** Reasons include that CCh/Bd are the most important issues facing the Park/its economy, whilst it is also noted that nature conservation has primacy among the NP aims. One action re a circular economy is considered insufficient and a new approach/ambition/actions are required to address the declaration of a Climate Emergency (as raised at a consultation meeting with Scottish Environment Link). The EAP should include more analysis of impacts/opportunities – for example impacts on infrastructure from an increase in extreme weather, increased flood risk and the effect on natural resources (such as salmon and soils). The EAP should show more ambition and involve people in designing solutions/setting out how economic activity can contribute to solutions rather than increasing problems (WT, NK/PW, SNH, GB, SCNP, AE, BSCG, SCNP).
26. CNPA: the plan could prioritise the establishment of a network of **electric vehicle charging infrastructure** to ensure that people can move around the whole of the National Park in an electric vehicle (this could be included as a measurable target/indicator)(CBP would support packaging and promoting this through our networks) (SLE, RSPB, CBP, CC)
27. **All new housing in the National Park should be carbon neutral** (some suggest Passivhaus category)/have high standards of design and high energy efficiency (NK/PW, SNH, BSCG, CC).
28. **Training** should be provided (including for young people) in how people can understand and reduce their carbon footprint, improve efficiency, identify entrepreneurial opportunities and encourage biodiversity as part of their current and future business/work. It is key that residents and businesses in the park have the skills and knowledge to address climate and biodiversity challenges, for example in business models (RSPB, NK/PW, SLE, BSCG).
29. **Business support** should be provided to address climate change and biodiversity loss (especially those businesses which seek to take action) (RSPB, NK/PW, SLE).

30. **Circular economy** - A number of respondents commented on this:
- a) A **business-led approach is suggested** (CBP are happy to lead on circular economy opportunities, subject to adequate resources and funding being available) (SLE, CBP).
 - b) Circular economy should form part of the strategic context of the Economic Action Plan and be given greater prominence in the actions (SNH, BSCG).
 - c) Opportunities could be identified by **engagement with key stakeholders** to understand where circularity could complement other activity and offer opportunities for business.
 - d) Analysing material flows and waste generated by key sectors/organisations may identify helpful actions such as setting strict targets for waste disposal and landfill (the hospitality industry may have particular issues re food waste). **Zero Waste Scotland** could be helpful re opportunities in key sectors and has case studies on Edinburgh, Tayside, North-East Scotland (SNH, BSCG).
 - e) Scope for a **Monitor farm/Pilot Project** (one area of interest may be upland livestock systems) (SNH).
 - f) The **Circular Economy Investment Fund** has support available to target sector businesses (SNH).
 - g) AC keen to work with CNPA on the **Circular North East programme**.
 - h) Measures might include: optimising the **energy efficiency of buildings**, making buildings **self-reliant for water supply** and waste management, using **green energy sources**, greater resource efficiency in agricultural practices (livestock production in particular) (SNH).
31. EAP should not include actions that add to CCh/BI emissions – for example construction, gap solutions for ski-ing on Cairngorm Mountain without a considered masterplan, actions that promote driving (e.g. Snow Roads). We should stop promoting the Park for eco-tourism and instead raise awareness of the different ways people can be environmentally friendly (BSCG, CC).
32. Other suggestions from separate respondents:
- a) Investment in **natural capital** should be a key principle on which to base economic strategy and a Priority Theme from which actions flow. These can include specific plans to identify risks and opportunities relating to natural assets, target investment, enhance skills, improve long-term resilience and build businesses utilising natural capital assets. Another focus could be investing in the growth and diversification of business sectors that draw on the special qualities of the Park (such as sustainable tourism/food/drink) and **identifying value chains** that link natural assets with local business needs and potential investors (SNH).
 - b) Plan could go further in providing detail on how implications (and ensuing economic trends) will be addressed - for example re **investment in cycle routes/infrastructure**, greening measures, **micro-renewables** in housing and other developments (RSPB).
 - c) Develop a **climate positive rating for businesses** along with a training programme (CC).
 - d) EAP should refer to climate change mitigation before adaptation ('we do not need to adapt to climate change we need to reverse it') (CBP).
 - e) **Lack of actions re low-carbon transport** and the negative impacts of **A9 Dualling** are not assessed) (NK/PW).

- f) Work towards **all electric and/or hydrogen public transport and extend the network** to and from popular destinations (CC).
- g) Review of policies for Forestry and Farming required re climate change (RT).
- h) **Energy transition** will be a greater factor going forward (SE).
- i) Plan is not clear how the Priority Themes align with delivery of national priorities – for example re climate change, biodiversity loss and natural capital (SNH).
- j) SLE members can be key delivery partners in contributing to **carbon sequestration** under forestry, farming and moorland policies (SLE).
- k) Investment in nature through **nature-based solutions** can be a cost-effective way of managing Climate risks to the economy (and be enhanced by work to connect the value with wider community and economic benefit, such as through natural flood management) (SNH) we should plan for anticipated changes in climate including increased frequency and intensity of flood events. Hydro dams could help (AE).
- l) Waste Water Treatment Works - EAP should refer to the problem from low water flows and elevated temperatures associated with climate change (BSCG).
- m) Engagement with UNWTO Tourism for Sustainable Development Goals (SDG's) (SNH).
- n) **Construction** is a major contributor to climate change and biodiversity loss (BSCG).

Skills

- 33. Three respondents expressed **support for the inclusion of training and skills action** (TGDT endorse support for **CLP** (Cairngorms Learning Partnership), SLE#Route 2050 report priorities include training/knowledge for **improving efficiency**) (CBP, TGDT, SLE).
- 34. Support for a **training priority around technology and digitalisation** (CBP in conjunction with CNPA/HIE/SE would be happy to deliver and/or facilitate the delivery of digital training for all relevant sectors although funding would need to be identified - for example from CNPA/HIE) (Visit Aberdeenshire keen to collaborate with CNPA re their digital skills for tourism businesses training) (SE, CBP).
- 35. Highland Council's **Business Gateway Service** has provided a range of advice and assistance to SMEs in the area and Aberdeenshire council keen to work with CNPA re Business Gateway services (HC, AC).
- 36. Other suggestions from separate respondents:
 - a) A skills plan may help identify opportunities for sectoral growth or potentially new sectors. Skills Development Scotland (**SDS**) recently prepared a **Skills Action Plan for Rural Scotland**: <https://www.skillsdevelopmentscotland.co.uk/media/45683/skills-action-plan-for-rural-scotland-summary-report.pdf> (SE).
 - b) SLE#Route 2050 report priorities include government bodies and businesses **improving the use of data to target investment** (SLE).
 - c) Highland Council have a **role in skills development as the local educational authority** (and work closely with Skills Development Scotland) (HC).

- d) **Unclear how skills gaps and partners to help close those gaps will be identified.** Further research is required (CBP would be happy to support CNPA in doing this or identifying an appropriate body to do so) (CBP).

Theme 4. Infrastructure and Capital Investment

Housing

37. There is a **shortage of affordable/suitable housing** (which affects organisations capacity to attract and retain employees) (RT, CBP, SLE, AE).
38. **An Camas Mòr:** some would appreciate a greater sense of urgency from CNPA/SG/other stakeholders so that the vision for a new well-designed, exemplar, sustainable community has the public infrastructure situation resolved and the community can be commenced in 2021. (CBP would be happy to use their channels to promote this if the infrastructure was in place to deliver the promise) (CBP suggest **CNPA creates and leads a task force for this and other key developments**) (RT, CBP). However another respondent suggests ACM is stopped due to it being on green space and adding to biodiversity loss (CC).
39. There were a number of suggestions for increasing the availability of housing for local people/increasing housing supply:
- Enhancing **community and business-led housing delivery supported**, (although it is reported that BSW Timber has already run into challenges with timeframes and support) (NK/PW, CBP).
 - Affordable housing should be **affordable in perpetuity** (BSCG, CC).
 - There should be a **change in legislation/taxation to enable more homes for rent for locals** (Scottish Government policy and regulation does not incentivise property owners to refurbish and rent out existing houses to residents or build new houses to rent on land they own) (AE, SLE).
 - Increased tourism is having a negative effect through **increasing numbers of second homes** (AE).
 - A **residency criteria should be introduced** (so new builds are for residents) (AE).
 - Support for **smaller housing schemes** (AC).
 - Support for more focus on **retrofitting of old buildings** (BSCG).
40. Housing Assessment eg Housing Needs and Demand Assessment (**HNDA**) **inadequate - it omits substantial numbers who do not apply for housing** as they have no expectation of obtaining a home. **Other surveys should be commissioned and additional surveys reviewed** (an example is the Highlands Small Communities Housing Trust detailed report for An Camas Mòr) (RT, SLE).
41. Other suggestions from separate respondents:
- Sustainability - housing delivery needs to include holistic consideration of factors** including public transport, space for community facilities, business, ecological enhancement, learning and recreation (SLE).

- b) No objection to a **review of vacant and derelict land and property, stalled development sites and impacts of short term lets** – however any review must be carried out in a transparent and inclusive manner (CBP).
- c) CNPA urgently need to develop ways to **significantly reduce the level of new housing** as construction is a major contributor to the problems of climate change and biodiversity loss (BSCG).

Natural Heritage

42. Suggestions from separate respondents:
- a) **Investment in natural capital** should be a key principle for the economic strategy and ideally a Priority Theme from which actions flow (for example actions around investment in growth and diversification for business sectors such as sustainable tourism/food/drink that utilise the special qualities of the Park or actions identifying value chains linking natural assets/local business needs/potential investors) (SNH).
 - b) **Investment in landscape scale ecosystem projects** should be an action (and has successfully attracted private funding previously) (WT).
 - c) **Forestry and woodland** is important both for itself and as an asset for Tourism. Woodland creation and protection (particularly Ancient Woodland) is important (WT).
 - d) **Replacing hill farming with large scale forestry** could have having negative effects on habitats and landscape (AE).
 - e) More potential **opportunities for Heritage Land Use**, including countryside activities and the cultural heritage (RT).
 - f) Concerns over the **impacts of the A9 dualling** (for example Crubenmore to Kincaig section) (RSPB).
 - g) **An Camas Mòr (ACM)**: A robust set of detailed mitigation measures and monitoring will be required to ensure that ACM does not have an adverse effect on internationally designated sites for Capercaillie or compromise achievement of biodiversity targets and other priorities in the Cairngorms Nature Action Plan (RSPB).
 - h) Scope for greater emphasis on the **linkages between business and nature** (SNH).
 - i) Possible development of **Landscape Enterprise Network** (SNH).
 - j) Plan should be clear that economic projects should not have a negative biodiversity impact (WT).
 - k) Increasing numbers of tourists has a negative effect on environment (AE).
 - l) Environmental education opportunities such as exhibitions, signage on walks, rangers and guides (AGCT).
 - m) Construction is a major contributor to climate change and biodiversity loss (BSCG).

Theme 5. Community and Enterprise

43. There is **no mention of economic problems of community high streets/high streets need more support** (need change in consumers attitude to shopping locally) (GB, GBA).

44. Suggestions from separate respondents:
- a) **Social and Economic Development should be considered together** - it is critical that employees/people can live in sustainable, balanced, confident, strong, resilient and supportive communities close to family, friends, employment, transport options (RT).
 - b) Need to **make towns attractive places for people of all ages to live** (FSB).
 - c) Community-led development; SLE welcomes work to secure this after the end of the current LEADER programme ends (SLE).
 - d) Questionable whether the survey points for the current visitor survey would capture many mountain bikers, so it is **possible that input from mountain bikers is not being captured** (AGCT).
 - e) **Complementarity noted re the Cairngorm LEADER Local Action Group strategy objectives with those for North and South Aberdeenshire LAGs** ... particularly around building community capacity; growing the economy; attracting and retaining young people; and improving transport and wider connectivity, including digital (SE).
45. HIE suggest **changes to the list of Actions and Lead organisation(s)** (pages 13-17).
- a) Under Priority Theme 3 “Local Provision of Further and Higher Education” should be added as an action with UHI as lead organisation.
46. Suggestions for other participants on listed actions:
- a) Wages - CNPA, HIE, SDS (and possibly CBP and FSB?).
 - b) Tourism - CNPA, Visit Scotland, CBP (as the DMO).
 - c) Cairngorm Mountain - SNH, wider community (rather than Community Trust).
 - d) Economic and social data - HIE, SE.
 - e) Investment in community-led development – HIE.
 - f) Developing an entrepreneurial culture - HIE.
 - g) Housing delivery - Local Authorities? (HIE)

Other Comments and Information

- a) EAP insufficient re key elements of the economy that are a strength/could be reconsidered to take a more holistic view of the strengths and potential opportunities within specific elements of our economy for example, **farming and renewable energy**. Renewable energy is a growing sector for many rural businesses and it is particularly important in the context of the climate emergency, whilst although the plan talks about building the case for a regionalised approach to agriculture, it could be more ambitious, specific and measurable (CBP, SLE).
- b) **Inequality/Inclusive growth** - should be highlighted/reviewed further, given the much greater awareness of in-work poverty nationally and CNP being one of most unequal places in Scotland (SE, NK/PW).
- c) **Rural development Framework**: idea of long-term planning for land-use, business development and housing welcomed (many estates already do this) and SLE would welcome further involvement in this where appropriate. Any pilot framework needs to establish that this exercise will not become a burdensome

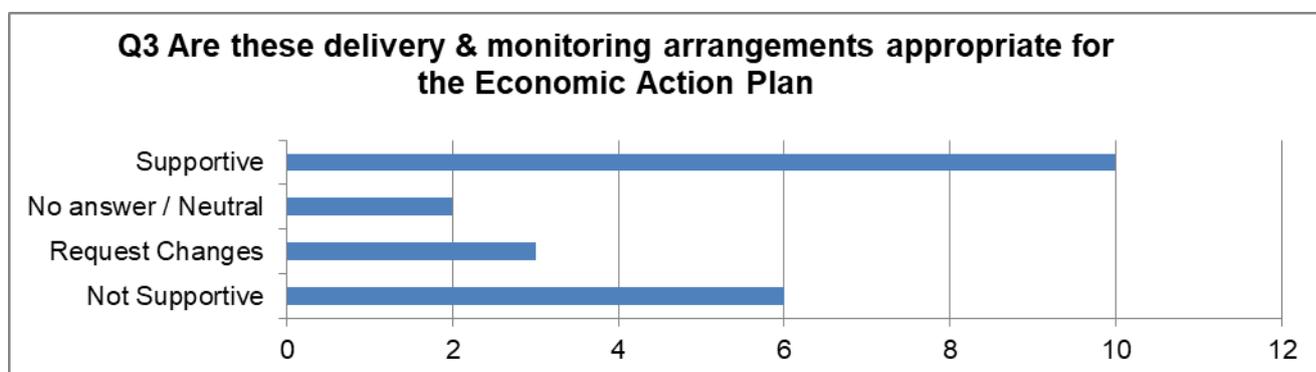
requirement on small estates and communities with limited resources. Some SLE members indicated that something akin to this had been developed in the precursor to the CNPA but had not been acted on. TGDT would like to be involved in a Rural Development Framework pilot with CES (Community Energy Scotland?) (SLE/TGDT).

- d) **Flexibility:** EAP needs to be (more) flexible re changes in the economic environment. Questioned what mechanisms will be in place to ensure the EAP can adjust actions in response to changing economic circumstances? CBP recommend establishment of an economic action group which could help with responsiveness. (CBP, NK/PW).
- e) **Top Down/Bottom up:** EAP needs to be more bottom up/is more likely to achieve real change from a series of bottom up discussions among businesses, local residents and other stakeholders focussed on how to develop the economy/change land-use (CBP, NK/PW).
- f) EAP should set a target to phase out single use **plastic** in the Park and lead the way in substitution of agricultural plastics (BSCG, CC).
- g) **Cairngorms Connect** should also be added to the list of 'Capital Investment Priorities' due to the economic value of the project, provision of employment and natural capital (RSPB).
- h) SLE members can be important delivery partners (SLE).
- i) Proposed plan has positive elements but would not deliver strategy discussed at 09-2018 meeting between CNPA and CBP **The primary ambition of the economic strategy of the National Park should be: To sustain and grow the population of young and working age people in the National Park** (in line with the National Park Partnership Plan) and ensure the National Park is an attractive place that encourages business to invest" (CBP).
- j) 'CBP met with CNPA in September 2018, the output of that meeting was shared and agreed as a fair reflection. The consultation documents, which we do not believe take significant account of our input, were approved for consultation by the CNPA Board on 6th December 2018. Why was the decision taken not to run the consultation at that time when it could have benefited from both better engagement with business and informed the LDP consultation? Therefore some CBP members have specifically requested that the consultation remain open until the end of January 2020 – can this be done?' (CBP).
- k) Key factors for economic development (not mentioned under specific topics) include:
 - i. Digital Infrastructure/Connectivity (CBP, FSB).
 - ii. Physical Infrastructure (including visitor information centres) (CBP).
 - iii. Improved Public Transport (CBP) (HIE noted the Moray Growth Deal overlaps with the Park and should improve public transport through the bus service initiative) (HIE).
 - iv. Excellent Transport Links (FSB).
- l) SLE #Route 2050 report priorities include access to **capital and knowledge** to improve productivity and resilience (SLE).
- m) **Competitive Capitalist System:** EAP includes no analysis of the impact on the National Park, such as impact on wages (NK/PW).
- n) Land Ownership should be assessed due to its impacts on economy and employment (NK/PW).

- o) Changes in strategic context section should include Community Empowerment Act 2015 and enhanced role of communities re service delivery, asset ownership and economic prosperity (TGDT).
- p) **Brexit** may create both opportunities and challenges re any changes in trading environment and the value of pound (SE).
- q) **HIE's Draft Strategic Framework – Cairngorm and Wider Area** will also provide further local context and provide opportunity for alignment, collaboration, leverage but there will need to be care to avoid duplication of effort and resource (SE).
- r) Public grants for private landowners (e.g. for farming and forestry) needs to be reviewed (NK/PW).
- s) Some of the actions are quite high level and will need some more detailed planning (by leads/partners) around delivery milestones including time frames. There may be scope for the Plan to align with or reference the SG economic priorities around International, Innovation and Inclusive growth. The diagram (p12) could benefit from demonstrating how the themes relate to the key drivers/economic factors and then linking to the strategic opportunities and how they connect to the economic strategy priorities in Annex A (SE).
- t) Actions around wages, circular economy and social enterprise could be more powerfully included as cross-cutting actions rather than stand-alone i.e. how are these areas promoted in the way we develop sectors (Theme 1) or in the way capital investment priorities are delivered (Theme 4)? (SE).
- u) **Key responsibilities for the co-ordination/delivery of the Plan will need to be defined** and benefit from inclusion of the private sector (given potential leverage opportunities and to help secure 'buy in' from businesses) and community representation (SE.)
- v) EAP does not mention Opportunity North East (AC).
- w) There is a danger of turning what was an active and dynamic diverse growing economy into a moribund museum dominated by tourism and the public sector (AE).
- x) Cultural aims should be strengthened (Culture should be in Priority Theme 1 and be part of the opportunities infographic) and include reference to **Gaelic culture and language**, Gaelic Tourism Strategy for Scotland and the CNPA Gaelic Language Plan (BNG).
- y) The plan refers to an economic strategy but not clear what that economic strategy referred to is? (the Partnership Plan refers to the now expired strategy whilst Annex A within the consultation document is not what we would describe as an economic strategy) (CBP).
- z) CBP raised questions regarding resolving any **conflicts between NP priorities** - How these are to be resolved? What is the process within the CNPA for deciding if there is a perceived conflict and what proportion of greater weight is applied? Do the CNPA Board retain this power? If it is delegated to officers to whom and how is it delegated? What conflicts have been identified in the drafting of this plan? CBP recommend that an economic strategy, alongside other strategies, would help to both decide on perceived conflict and the appropriate weighting to be applied (CBP).
- aa) EAP needs action points on how opportunities can be taken and threats overcome (FSB).
- bb) New action on historic architecture needed to identify landlords and assist with applications for funding (GBA).

- cc) EAP needs more emphasis on A9 dualling opportunities (HIE).
- dd) EAP appears to consist mainly of a regurgitation of old material (NK/PW).

4. Delivery and Monitoring of the Plan



- 47. Two respondents reported some reluctance to contribute to the consultation, due to a perception that the views of land-based businesses are not being listened to and that CNPA strategies and plans do not reflect the concerns, needs or aspirations of those who live or work within the Park (SLE, AE).
- 48. Other suggestions from separate respondents:
 - a) Given the complexity of the issues, it is essential that the **CNPA takes a leadership role in the development and delivery of an Economic Strategy** for the National Park. CNPA could also be more pro-active re targeting the types of investment that are most appropriate to achieving the National park aims. Questioned whether the CNPA can include this within the EAP and work with the CBP and Enterprise Agencies to establish **how to agree and target specific inward investment opportunities?** To support this CBP suggest the creation of an **economic strategy group**. (CBP).
 - b) Support for CNPA role as a facilitator that enables **collaboration between stakeholders**, particularly outside of the established 'bubbles'. Suggested stakeholders include: local people, Scottish Government (SG), Scottish Environmental Protection Authority (SEPA), Scottish natural heritage (SNH), Scottish Executive Rural Payments and Inspections Directorate (SERPID), Historic Environment Scotland (HES), Environment Scotland, Transport Scotland re Trunk Roads, Homes for Scotland, Local Government(s) (including housing, education, roads and planning departments), Visit Scotland, utilities, private sector organisations, Royal Society for the Protection of Birds (RSPB), Scotrail (RT).
 - c) Recommend that the CNPA does more to lead on delivery, for example by creating and leading **task forces for key developments** to help remove any barriers (one example would be An Camas Mòr) (CBP).
 - d) Promote an understanding with SG and others that the Cairngorms is a very special area that justifies adjustments to normal policy (RT).
 - e) **Planning** - CBP report a positive engagement and responsiveness from CNPA for pre application discussions, however they feel that for Planning Applications,

the planning process leads to lack of responses/delays. They query whether CNPA could separate economic development from planning and establish procedures for 'Chinese walls' within the Authority (right up to board level), so businesses can continue to receive support and guidance but not jeopardise the important planning process? CBP also question whether it is possible for CNPA to consider a more risk based approach to planning? (CBP).

- f) Also questioned what resources, (out with the Authority's statutory planning function of restricting inappropriate development), will the Authority put towards delivery of the EAP? (CBP) EAP includes no evidence of resources to deliver plan (GB).
- g) Suggest to the Minister to mention **An Camas Mòr** as a priority in the Action Plan as in the current Economic Strategy (RT).
- h) Tomintoul and Glenlivet Landscape Partnership (TGLP) legacy needs CNPA support to maximise the benefits (TGDT).
- i) Scope for **a greater degree of integration between this plan and the other subsidiary CNPA action plans** (SNH).
- j) Not much point in dedicating much resource to monitoring a **plan which is already in many senses out of date due to global warming and Brexit** (which if it goes ahead will terminate many of the funding streams with no alternatives being put in place.). Substantial changes to the EAP likely to be needed over the next three years and CNPA need a different way of doing this (SCNP).
- k) Consider HIE's failure to engage with stakeholders, co-operate with the "Glenmore" Strategy or provide a masterplan at Cairn Gorm as challenging the Park's credibility (SCNP).
- l) Requests from planners regarding trees and paths (for example), were seen to be unreasonable, inconsistent and to inhibit economic diversification (SLE).
- m) Collaboration: queried how the success of collective working monitored/reported and whether participants in partnership working feel they are listened to and able to contribute? (RT). Cairngorm Mountain situation indicates CNPA and HIE need to collaborate more effectively (NK/PW).
- n) CNPA communications have a problem in that the net effect of all Plans is not reported (for example they need to provide a net balance between tree planting and peat restoration gains compared with losses from hill roads, felling, muir burning and construction (CC).
- o) Add BNG to Economic Steering Group to act as culture champion (BNG).
- p) The Plan should identify some 'quick wins' to establish support and allow it to gain real traction and impact (SE).

Indicators, Data, Monitoring

49. Several respondents considered there were general issues with the proposed indicators, data and monitoring:
- a) Suggested targets and indicators set for rural development in the National Park Partnership Plan do not neatly reflect the range of EAP actions proposed.
 - b) Proposed indicators insufficient to determine whether the EAP has been successful or questioned how success will be measured against the 5 priority themes.
 - c) Should include quantitative targets.

- d) More specific targets and indicators need to be developed and they need to be 'measurable, measured and acted upon'.
 - e) Should not measure success in visitor numbers or government investment.
 - f) Sustainability of the economy should be given a higher priority (HC, WT, CBP, SLE, AC, RSPB, AE).
50. Two respondents felt additional clarity was needed on **who is responsible for the actual delivery** or how the body responsible for delivery is determined (ACGT, GB).
51. Suggestions from separate respondents:
- a) Monitoring should not be too onerous - **A high-level RAG status could be applied to each of the high-level actions** (assuming that each project developed against the actions will have its own monitoring arrangements in place) (SE).
 - b) Combining demographic, social, economic and infrastructure trends together for the whole Park **hides huge anomalies between different communities within the Park** (e.g. from tourism and its impact) - monitoring of supply and demand should be split by community (AE).
 - c) Questioned whether the data is to be updated and improved as part of the data gathering exercise for the next statutory Park Plan (to include a measure of economic value added) and whether CBP and others will be consulted about what data is needed to help develop an effective economic strategy? (CBP).
 - d) Economic data on p8 is more than 4 years old and a question was raised whether the data will be updated prior to the next park plan? CBP would like to be involved in deciding what data would effectively inform economic strategy (CBP).
 - e) Plan should include a **set of indicators that are assessed as part of the proposed annual review**.

Cairngorms National Park Authority
November 2019