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Ref: Safeguarding Scotland's Water Environment Consultation

The Cairngorms National Park Authority (CNPA) welcomes the opportunity to contribute to this consultation at a time when pressures on Scotland's water environment are intensifying and becoming increasingly interconnected. Climate adaptation, water scarcity, biodiversity loss, diffuse pollution, hydromorphological change are already negatively impacting the people and wildlife living within the Cairngorms National Park.

The National Park has a significant role to play in delivering the ambitions of Scottish Government in a coordinated place-based approach that cuts across policy, thematic and regulatory boundaries. Ambitions in the National Park Partnership Plan (NPPP) for integrated catchment management delivering multiple benefits for biodiversity, climate resilience and socio-economic benefit align very well with the priorities in RBMP 4 and we would like to see a RBMP framework that enables innovation in the National Park, trialling solutions to some of the most pressing issues facing Scotland as a whole.

The Park Authority and partners are currently developing the NPPP 2027 – 2032 which will describe the strategic objectives for water resource management in the National Park.



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This is a key opportunity to strengthen alignment across national policy and place-based delivery. RBMP 4 is a key source of evidence and direction for understanding pressures on the water environment in the National Park, prioritising action, and coordinating delivery across partners. It is critical that the RBMP and the next NPPP develop in tandem.

The Park Authority promotes an innovative, place-based approach to improving the water environment with plans to integrate landscape-scale ecosystem restoration, reversal of biodiversity decline, nature-based solutions to the impacts of climate change, collaborative delivery models, and blended funding approaches.

To support this approach, we would like to see RBMP 4 contain a clear emphasis on:

- place-based, catchment resilience proposals and action;
- updated approaches to water scarcity and prioritisation;
- water as a foundation for sustainable economic development;
- requirements for keystone and flagship species such as Atlantic salmon and freshwater pearl mussel integrated into targets;
- nature restoration and blue-green infrastructure highlighted as tools for climate adaptation and biodiversity recovery;
- consideration of 'smoothing the flow' incorporated within the EIA scope for material landscape-scale projects; and
- support for secure, long-term funding necessary to achieve landscape-scale change

Yours sincerely



ANDY FORD
Director of Nature and Climate Change



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