

Cairngorms National Park  
Partnership Plan 2017 – 2022  
Consultation Report  
December 2016

**THE  
BIG 9**

**#BigParkBigQuestions**



# THE BIG 9

## Formal Responses



**319** consultation responses received with  
**72%** submitted online through Survey Monkey

## Engagement



Over **250** people attended **7** issue specific meetings across the National Park



Meetings held with all Community Councils and Local Authority Area Committees in the National Park



**4,400** hits on the consultation webpages; and  
**1,100** views of the issue specific video clips

## Social Media



**140** tweets using #BigParkBigQuestions



**260** re-tweets



**140** likes



**110** hashtag clicks



**440** URL clicks



A total of **1,780** people engaged and interacted with the consultation through twitter

# **CONTENTS**

CONTENTS .....	1
1. INTRODUCTION.....	2
ABOUT THIS REPORT .....	2
2. BACKGROUND TO THE CONSULTATION .....	2
CONTEXT .....	2
OVERVIEW OF CONSULTATION.....	3
EVENTS PROGRAMME .....	4
WEBSITE, SOCIAL MEDIA AND PRESS ENGAGEMENT .....	5
OVERVIEW OF CONSULTATION RESPONSES .....	6
3. RESPONSES TO THE CONSULTATION QUESTIONS .....	7
VISION .....	7
CONSERVATION .....	10
CONSERVATION CHALLENGES.....	11
ISSUE 1: LANDSCAPE SCALE CONSERVATION .....	14
ISSUE 2: DEER AND MOORLAND MANAGEMENT .....	25
ISSUE 3: FLOOD MANAGEMENT .....	32
VISITOR EXPERIENCE.....	38
VISITOR EXPERIENCE CHALLENGES .....	39
ISSUE 4: VISITOR INFRASTRUCTURE .....	41
ISSUE 5: ACTIVE CAIRNGORMS.....	50
ISSUE 6: LEARNING AND INCLUSION .....	57
RURAL DEVELOPMENT .....	65
RURAL DEVELOPMENT CHALLENGES.....	66
ISSUE 7: HOUSING .....	68
ISSUE 8: COMMUNITY CAPACITY AND EMPOWERMENT .....	78
ISSUE 9: ECONOMIC DEVELOPMENT .....	84
RESEARCH PRIORITIES.....	97
GENERAL COMMENTS .....	100
POLICIES.....	103
APPENDIX I – LIST OF RESPONDENTS .....	121

# **I. INTRODUCTION**

## **ABOUT THIS REPORT**

This report provides an analysis of responses to the consultation on the Cairngorms National Park Partnership Plan 2017-2022, which took place from 27 June – 30 September 2016. The report summarises the responses to the consultation, identifying trends and issues where appropriate. Its purpose is to help inform the final version of the Partnership Plan.

## **2. BACKGROUND TO THE CONSULTATION**

### **CONTEXT**

The Cairngorms National Park Authority (CNPA) is in the process of producing a new National Park Partnership Plan for the period 2017-2022. The Partnership Plan is the management plan for the Cairngorms National Park and sets out how all those with a responsibility for the Park will co-ordinate their work to tackle the most important issues.

In particular, the National Park Partnership Plan:

- sets out the vision and overarching strategy for managing the Park;
- guides the work of all public bodies and other partners to deliver the aims of the Park;
- provides the strategic context for the Local Development Plan;
- sets out the regional land use framework for the Park; and
- shows how the Park will contribute to the Scottish Government's core purpose and national outcomes



## OVERVIEW OF CONSULTATION

In order to inform the development of the new Partnership Plan, a consultation document was produced to seek views on:

- the big challenges we should be addressing and the issues we need to tackle;
- what would make the biggest difference to tackling these; and
- the proposed policy direction

The consultation document did not aim to cover everything relevant to the Park, but instead outlined nine big issues (the 'Big 9') on which views were sought. A public consultation was undertaken on the Big 9 issues over a 14 week period from Monday 27 June until Friday 30 September 2016.

The main aims of the consultation were to:

- reach target audiences and inspire them to engage in the consultation process;
- raise understanding about the Big 9 issues facing the Park and gather views and proposed solutions;
- make people aware of why the National Park is important for Scotland; and
- gather evidence of support for the agreed strategic direction/proposed solutions for the next National Park Partnership Plan

To ensure the consultation was as inclusive as possible and met the National Standards for Community Engagement, a VOICE report was prepared and the consultation proposals were discussed and approved at an Inclusive Cairngorms meeting held on 14 April 2016.

Hard copies of the consultation document were made available for public viewing in CNPA's offices (Grantown-on-Spey and Ballater), and at all council offices and libraries within the National Park. Copies of the consultation documents were also published on CNPA's website (see further details below).

All key stakeholders were notified of the start of the consultation, and hard copies of the consultation documents were sent to all Community Councils within the Park, all constituency MPs and MSPs within the Park, and relevant Local Authority Leaders.



## EVENTS PROGRAMME

A programme of consultation events was undertaken in order to reach and engage with target audiences. Events were arranged to address each of the Big 9 issues, with CNPA Board Members and Officers also being assigned to lead and champion each of the issues. The programme of consultation events is summarised below:

<b>Big 9 Issue</b>	<b>Event</b>
<b>Landscape Scale Conservation</b>	Cairngorms Nature Seminar - 28 June Grantown Show - 11 August
<b>Deer &amp; Moorland Management</b>	Cairngorms Nature Seminar - 28 June Cairngorms Deer Advisory Group (CDAG) – 28 September
<b>Natural Flood Management</b>	Spey River Catchment - 20 June Dee River Catchment meeting Grantown Show - 11 August
<b>Visitor Infrastructure &amp; Information</b>	Local Outdoor Access Forum (LOAF) - 6 Sept Cairngorms Economic Forum – 22 Sept
<b>Active Cairngorms</b>	Active Cairngorms meeting - 28 June Local Outdoor Access Forum (LOAF) - 6 Sept Association of Cairngorms Communities (AoCC) - 13 September
<b>Learning &amp; Inclusion</b>	Association of Cairngorms Communities (AoCC) - 13 September Inclusive Cairngorm - 8 September Local Outdoor Access Forum (LOAF) - 6 Sept
<b>Housing</b>	Housing Seminar - 20 September
<b>Community Capacity &amp; Empowerment</b>	Association of Cairngorms communities (AoCC) - 13 September
<b>Economic Development</b>	Cairngorms Economic Forum - 22 Sept
<b>All 9 issues</b>	Local Authority Area Committees
<b>All 9 issues</b>	Community Council Meetings

In total, over 250 people attended the specific consultation events plus many more who attended community council meetings.

## WEBSITE, SOCIAL MEDIA AND PRESS ENGAGEMENT

In addition to the consultation events, extensive use was made of the CNPA's website to promote the consultation. The Big 9 consultation document was published online along with summary information and detailed supporting evidence for each of the big issues. A short online video clip was also produced for each issue to provide viewers with easy-to-access background information and encourage them to engage with the consultation.

The consultation website was viewed extensively, with over 4,400 visits to the main consultation homepage being recorded during the consultation period. The video clips were also viewed extensively, with a total of more than 1,100 views being recorded during the consultation. A full summary of website visits and video views is provided below:

	NPPP home page	Big 9 Issue								
		Issue 1: Landscape Scale Conservation	Issue 2: Deer & Moorland Management	Issue 3: Flood Management	Issue 4: Visitor Infrastructure	Issue 5: Active Cairngorms	Issue 6: Learning & Inclusion	Issue 7: Housing	Issue 8: Community Capacity & Empowerment	Issue 9: Economic Development
<b>Webpage visits</b>	4,408	571	570	277	321	333	196	443	194	220
<b>Video Views</b>	138	228	146	86	78	133	56	87	100	66

An online response form was also made available on CNPA's website, and the majority of respondents used this to submit their comments (see further details below).

In addition to the website, significant use was made of CNPA's social media channels to promote the consultation process. Extensive use was made of Twitter and *#BigParkBigQuestions* was used to promote the consultation and encourage responses. Tweets were programmed to focus on each of the Big 9 issues at different times during the consultation period. There were a total of 140 tweets using *#BigParkBigQuestions*, and these were re-tweeted 260 times. A total of 1,780 people engaged and interacted with the consultation through Twitter.

Finally, a campaign of press articles and press-releases was used to raise awareness of the consultation through the media. Six press releases were issued during the course of the consultation, and articles covering the Big 9 consultation were featured in *Hollywood Magazine*, a range of local newspapers and also on local radio.

## OVERVIEW OF CONSULTATION RESPONSES

A total of **320 responses** were received to the consultation. The responses came from a range of organisations and private individuals, as summarised below.

<b>Respondent Type</b>	<b>No. of Responses</b>	<b>% of Total Responses</b>
Local Authorities	4	1.3
Other Public Bodies	8	2.5
NGOs/Voluntary Organisations	45	14.1
Land Owners/Managers	15	4.7
Business Interests/Private Businesses	26	8.1
Community Organisations	11	3.4
Private Individuals	211	65.9
<b>Total</b>	<b>320</b>	<b>100.0</b>

As the table above shows, the largest group of responses came from private individuals (c66%). The next largest groupings were NGOs/voluntary organisations (c14%) and business interests/private businesses (c8%). Nearly 5% of responses came from land owners/managers (principally land owning estates) and just over 2% came from other public bodies. 11 responses were received from community organisations (primarily Community Councils and Associations). Although this accounts for only 3.4% of all consultation responses it indicates that a large proportion of all 24 Community Councils/Associations within the National Park responded to the consultation. Similarly, 4 of the 5 local authorities within the Park area responded to the consultation (accounting for 1.3% of the total consultation responses).

Overall, approximately 71% (227) of all consultation responses were submitted via the online survey on CNPA's website. This further highlights the success of the online presence of the consultation.



### 3. RESPONSES TO THE CONSULTATION QUESTIONS

#### VISION

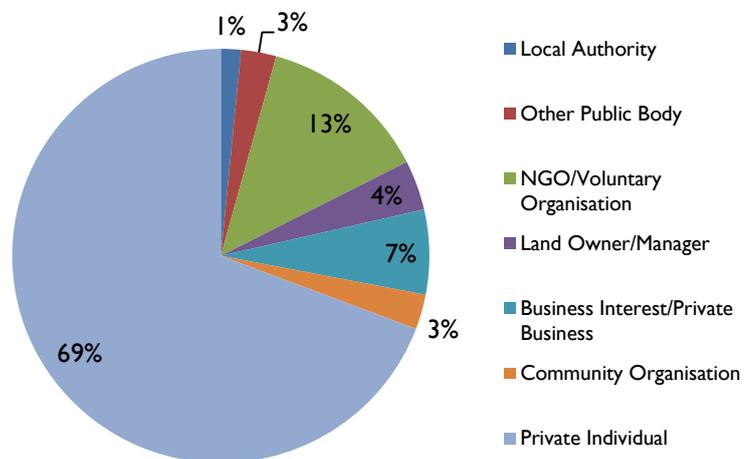
**Question: We think the vision and long term outcomes remain relevant and propose to retain these unchanged as the starting point for the next Partnership Plan for 2017 onwards. Do you agree?**

##### Overview

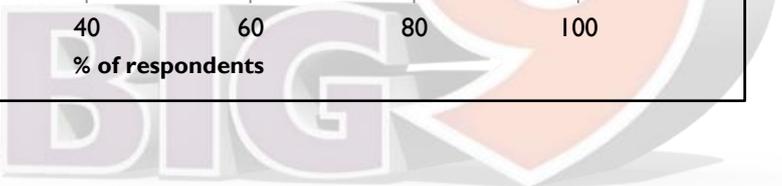
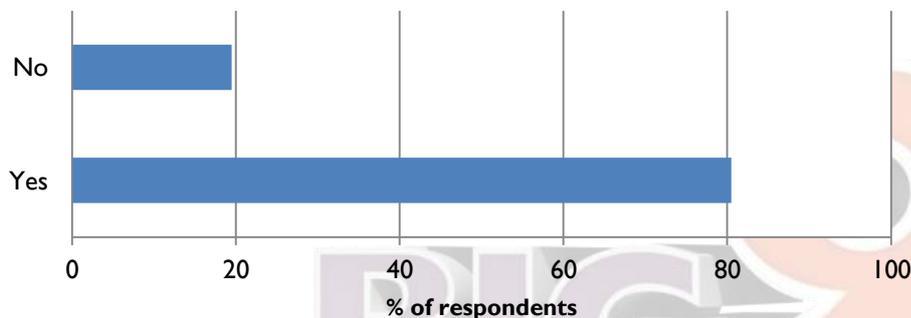
81% of all respondents answered this question. Responses were received from a range of stakeholder groups as shown below, with private individuals forming the greatest proportion (69%).

Respondent Type	No. of responses
Local Authority	4
Other Public Body	7
NGO/Voluntary Organisation	34
Land Owner/Manager	10
Business Interest/Private Business	17
Community Organisation	7
Private Individual	178
<b>Total</b>	<b>257</b>

Response by stakeholder group



Do you agree that the vision and long term outcomes remain relevant?



### Key points raised

- Significant level of agreement (81%) that the vision and outcomes remain relevant for the next Partnership Plan.
- Many respondents who both agreed and disagreed with the question were of the view that conservation and natural environment should be at the forefront of the vision and outcomes.

### Discussion

The majority of respondents were in agreement with the vision and felt that the long term outcomes remain relevant for the next Partnership Plan 2017.

Of those in agreement, many continued to emphasise that nature conservation should be at the forefront of the Partnership Plans vision, aims and outcomes. Many felt that conservation should be the overriding focus, with one landowner of the view that the authority needs to give greater weight to the aims set out in the National Parks (Scotland) Act 2000 (the Act). Others added specifically that the vision should clearly refer to the Sandford principle where conservation is prioritised in the event of a conflict between outcomes. A number of respondents raised concerns about land management practices and their impact on the qualities of the National Park. However, one NGO was of the view that that traditional moorland management for sheep, deer and grouse does help to fulfil the aims of the Act which include promoting sustainable use of natural resources and sustainable economic and social development.

A number of respondents queried whether the phrase ‘where nature and people thrive together’ is achievable and others felt that ‘sustainable economy’ should be defined. Respondents also felt that there should be greater reference and explanation of cultural heritage.

Those who did not agree with the vision also raised similar issues to those who did. A number of respondents felt that conservation should be a priority over the other outcomes and there should be a greater focus on wildlife protection. Reference was again made to the need for the vision and outcomes to clearly set out adherence to the Sandford Principle.

Some respondents felt that the vision is not specific and forward looking enough. It was felt that it is not clear what is being aimed for. Concern was expressed about the compatibility of the outcomes.

Some stakeholders felt that greater reference should be made to investment in people who live and work in the National Park. Reinforcing the ‘Parks for All’ message was also suggested along with promoting accessible experiences with the National Park. Support was again expressed for greater recognition of cultural heritage assets in line with the Act.

It was highlighted that there should be an ambition to reduce the National Park’s carbon footprint with a strategic vision including improving public transport infrastructure and

reducing car reliance of both residents and visitors. Finally it was raised that the role and importance of the Partnership Plan needs to be more clearly stated along with how it influences other policies and plans.





## CONSERVATION CHALLENGES

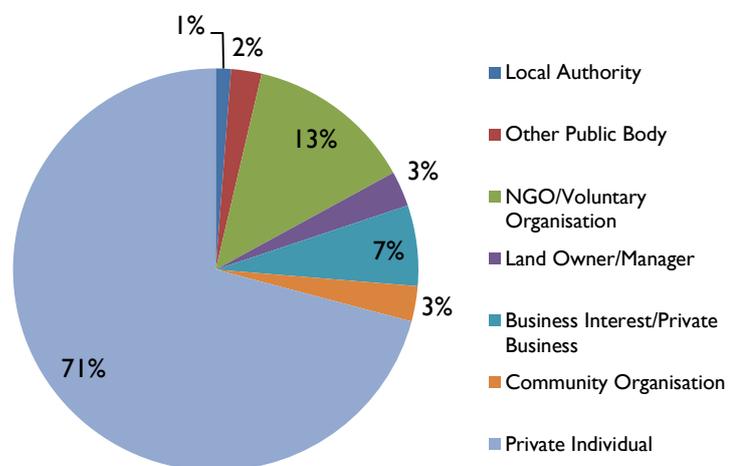
**Question: Do you agree these are the big conservation challenges we should be addressing through our next Partnership Plan?**

### Overview

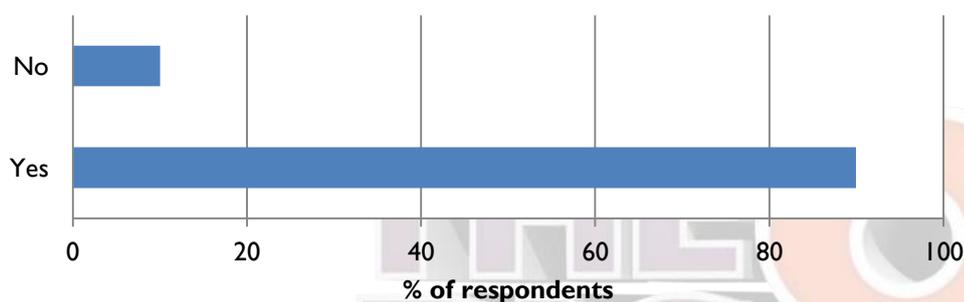
Most (77%) respondents answered this question. Responses were received from a range of stakeholder groups as show below.

Respondent Type	No. of responses
Local Authority	3
Other Public Body	6
NGO/Voluntary Organisation	33
Land Owner/Manager	7
Business Interest/Private Business	16
Community Organisation	7
Private Individual	175
<b>Total</b>	<b>247</b>

**Response by stakeholder group**



**Do you agree these are the big conservation challenges?**



## Key points raised

- The vast majority of responders agreed with the conservation challenges.
- Many responders, mostly private individuals, did not think the methods to address the challenges were compatible with grouse moorland management practices.
- A small number of responders disagreed with the challenges, either because they were opposed to grouse moors or in support of them.

## Discussion

The vast majority of responders agreed with the conservation challenges, especially in relation to landscape scale habitat restoration.

Many responders cautioned that while they agreed with the challenges, they were unconvinced that they were achievable without significant changes to the way grouse moors were managed. Many felt the existence of grouse moors was incompatible with achieving the vision and outcomes within the NPPP and that practices such as muirburn should cease. Others felt that not enough was being done to prevent wildlife crime within the National Park and that this was also incompatible with the NPPP's vision and outcomes.

Several responders were dissatisfied with the use of the term 'restoration' as they were unsure about what it meant in practice. For example, many asked what point in the past habitats were to be restored to.

Others were dissatisfied with the use of the word 'diversity' in relation to species as they argued that, without greater definition, it could include non-native and invasive species. Others felt that efforts should be focused on the species that were already present within the National Park and that the introduction of greater diversity should be a lower priority.

While mostly supported, some disagreement was found in relation to woodland expansion and the related protection of capercaillie. In terms of capercaillie, it was questioned whether it was appropriate to expend so much energy trying to support a fragile population when the species is common in other parts of Europe. It was felt that resources would be better allocated to other forms of conservation and wider management aims. Consequently several new issues were suggested:

- Balancing the management needs for different landscape vegetation types;
- Practical threats to delivery including threats to financial support for farming and sporting interests.

It was also suggested that the key questions should have included: "What can be done to support heather moorland and bog habitats? The answer to this, according to the poser of the question, included pro-active support by the NPPP of responsible heather moorland management within the National Park.

Inclusive Cairngorms requested that a new target about flood management be added to “Identify vulnerable groups at risk from flooding”. They also requested that a new big challenge be added: “Ensuring people across all equality groups have access to the environment.”

One NGO suggested the addition of the following considerations:

- Set targets for specific geographical areas;
- Target specific invasive non-native species in addition to mink;
- Adopt a Policy that landscape planting avoids non-native species;
- Set a direction of travel regarding use of non-natives in forestry schemes and forest plans.

There was a request for more information on the types of conservation issues in the consultation as it was felt that many people did not understand or were engaged with the issues.



## ISSUE I: LANDSCAPE SCALE CONSERVATION

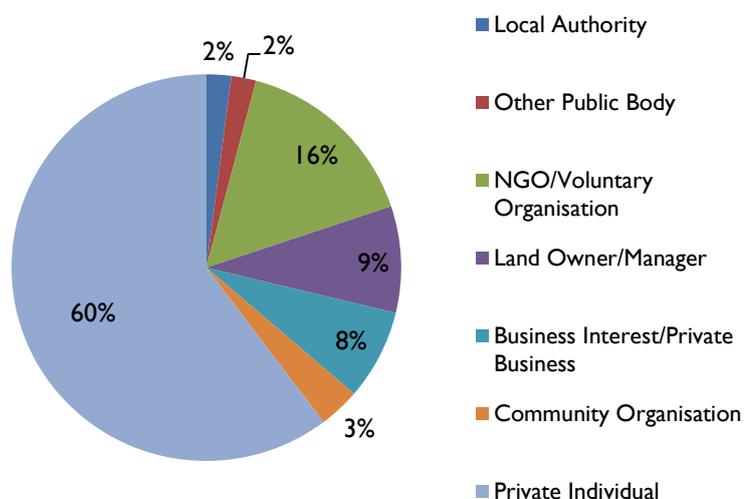
### Question 1: What more can be done to encourage woodland expansion and active woodland management in appropriate places?

#### Overview

Just under half (46%) of all respondents answered this question, with responses coming from a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	3
Other Public Bodies	3
NGOs/Voluntary Organisations	23
Land Owners/Managers	13
Business Interests/Private Businesses	11
Community Organisations	5
Private Individuals	88
<b>Total</b>	<b>146</b>

Response by stakeholder group



#### Key points raised

- The issue was deeply polarised with many arguing for and against woodland expansion.
- The issue of moorland management was brought up by many businesses, organisations and private individuals, with some arguing for its protection and others for it to be reformed.
- Greater clarity was requested on the location and nature of woodland expansion.
- Education, public engagement and more generous funding were seen as key to encouraging further expansion.

## Discussion

The complexity of the issue was recognised by many responders. The point was raised that it is not unique to the National Park, but is ongoing throughout Scotland. It was advised that the CNPA keep a watching brief on national developments.

Partnership working was seen as a positive way of expanding and managing woodlands. It was noted that there are currently many different organisations working towards the same goals for expanding woodland and should be brought together to work cohesively. Community involvement and volunteering was identified as a practical means of expanding and managing woodlands and building consensus. Examples included arranging planting days with schools, youth groups and local communities. Education about the benefits of woodlands was also seen as an important step, with landowners, land managers, tenants and the general public all being targeted. To some, these methods were seen as preferable to further regulation.

Several comments were received around the economics (or economic impacts) of woodlands. The cost of woodland management and expansion was raised along with concern over the economic viability of native hardwood woodlands as opposed to commercial softwoods.

The availability of funding to incentivise landowners was highlighted. Targeted forestry grant schemes to promote different types of woodland expansion were suggested, including help for riparian planting and upland woodland expansion. Several respondents felt that woodland expansion would largely need to be driven by long term economics. Some identified a need for changes to legislation and new grant schemes as important for ensuring landowners, farmers and crofters are not disadvantaged financially if they decide to convert some of their land into woodland (which could lose existing agricultural grants). The reduction in Forestry Grant Scheme (FGS) support for native woodland creation was perceived as a very significant scaling back in planting of such woodlands in Scotland.

It was suggested that one possibility for encouraging improvements in woodland condition might be the introduction of a level of cross-compliance in woodland grants, so that those in receipt of woodland expansion grants also have to protect existing woodland. This could be supported through the FGS using a Sustainable Management of Forests grant.

Some argued that natural regeneration was preferable over planting and was seen as preferable to replanting felled woodland. Others suggested more interventionist approaches such as the creation of nurseries to grow young native trees, and then planting more mature trees in expansion areas.

The location of woodland was also seen as important. The mapping of appropriate areas was suggested by several respondents, often linked to the opinion that the NPPP needed to provide more clarity about the nature of woodland expansion, including where and what

type of trees. One individual suggested that minimum areas should be set aside for woodland on the large estates within the National Park.

A number of responses were raised in relation to the management of moorlands. Stopping muirburn, subsidies for grouse and pheasant shooting and reducing deer numbers were all raised as means of expanding woodland and scrub. Some respondents asked that cull numbers / maximum deer densities should be set. Conversely, other respondents argued woodland expansion should not take place on heather moorland.

One respondent believed grazing cattle would help woodland expansion. Others requested the reintroduction of herbivorous mammals (beaver, wild boar, bovids) integrated with re-introduction of large predators, including wolves and Lynx.

There was a desire to encourage woodland planting schemes of mixed native species that increase connectivity and support local biodiversity. The planting of appropriate native species was an issue for many respondents. Attention to the role of fuelwood, especially of rapidly growing deciduous species such as birch, was also asked for.

One individual was of the opinion that CNPA policies and publications have grossly understated and undervalued the outstanding Landscape and Conservation values, the importance of the relict post glacial remnants of the Old Caledonian Pinewoods (OCPs), and the need to protect their special qualities. They argued that no attempt has been made to distinguish between these ancient self-regenerating boreal remnants and more modern plantations of Scots pine, all being described as Native Pinewood.

It was asked that the implications of the location, scale, style and detailed design of tracks associated with woodland expansion be considered, including for biodiversity; flooding, run-off and erosion; recreation.

Many were also keen to point out that woodlands were very difficult to create and maintain in some of the challenging environments within the National Park. The careful consideration of this policy was requested. The relaxation of the rules under the SRDP for the delivery of woodland was also raised a solution.

Concern was raised about the implications woodland expansion would have on current land use practices. It was argued that landowners and managers may value other land uses more highly than additional forestry. For example, landowners may wish to spread their land management interests and therefore spread risk. They may not wish to change from more labour intensive uses which could threaten local jobs and communities, and they may simply have a desire to farm or pursue a sporting interest over forestry. Scots pine plantations were seen as being able to lend themselves to multiple purposes, so agro-forestry and activity & wildlife tourism were considered possible and that these opportunities could be promoted. Greater concern was placed on the expansion of montane scrub as this, it was argued was not commercially viable and displaced existing land uses that were considered to be more highly valued. It was argued that woodland expansion should not be perused at the

detriment of local jobs. Restoring montane woodland was however strongly supported by those with an interest in nature conservation.

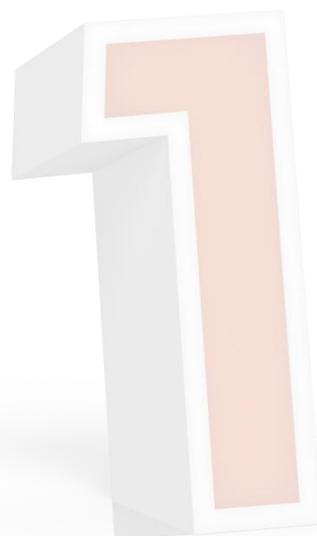
Concern was also raised about the effects of climate change and that the management of woodlands would need to take this into account, particularly if the area was likely to receive greater levels of rainfall.

Concern was also raised about the potential effects of woodland expansion on the historic environment. It was requested that ensuring the historic environment is protected and managed sustainably was added to the scope of the issue. Concern was also raised about its effects on sensitive habitats, including peatlands, bogs, floodplains and montane habitats.

Some questioned the policy direction and argued against woodland expansion, often citing the importance of moorland habitat as a reason. Rather than woodland expansion, some suggested that the focus should be on transforming the management of large areas of commercial forestry that still exist within the National Park. Others preferred to see greater emphasis on improving the condition of existing native woodland. The latter would require managing herbivore impacts, and in some areas removing non-native species.

One respondent asked that the NPPP acknowledge the perception of tension between Capercaillie and Rural Development. More clarity was requested on the types of new woodland desired, including its location and the types of species. They noted the draft Capercaillie Framework is a good start but, to engage the public, it needs to go out for consultation.

Some respondents highlighted the recreational importance of woodlands and asked that management should take both the effects of people on biodiversity and the rights of people to enjoy these areas, into account.



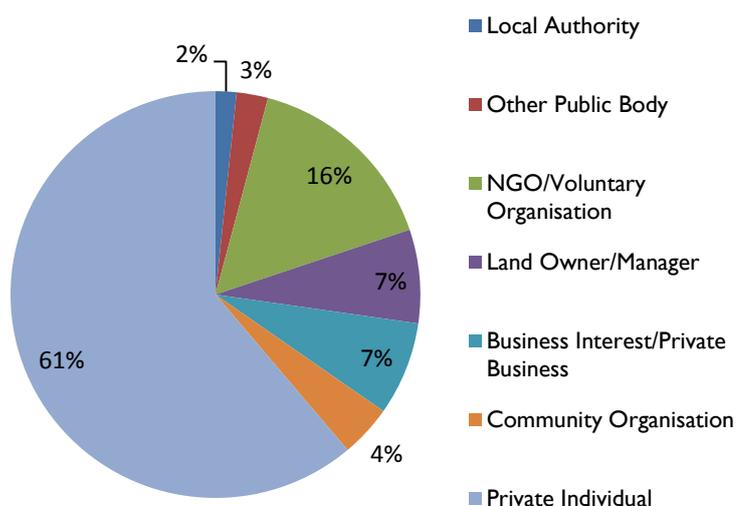
**Question 2: What are the best ways to support collaboration at a landscape scale?**

**Overview**

Just over a third (38%) of all respondents answered this question, with responses being submitted by a range of stakeholders.

<b>Respondent Type</b>	<b>No. of responses</b>
Local Authorities	2
Other Public Bodies	3
NGOs/Voluntary Organisations	19
Land Owners/Managers	9
Business Interests/Private Businesses	9
Community Organisations	5
Private Individuals	74
<b>Total</b>	<b>121</b>

**Response by stakeholder group**



**Key points raised**

- The issue was deeply polarised with many arguing for and against the activities of the National Park’s land managers and estates.
- Many responding to the consultation felt that partnership working was the best means of delivering landscape scale conservation. Some felt that these partnerships already existed.

**Discussion**

Several respondents suggested that better communication is needed between landowners, communities, conservationists and other stakeholders. Continued support for existing groups like Deer Management Groups was expressed and setting up fixed term groups as the need arises was also suggested. Others felt that there should be greater internal and cross boundary working. One means of coordinating this is the appointment of a dedicated project officer or officers who would engage with land owners and stakeholders and work through barriers which may be encountered. Education programs targeted at the different land users and age groups - owners, tenants, local communities etc. - was also suggested.

One specific suggestion was to adopt a new approach to farmland conservation based on 'Farmer Clusters (see Dent, 2013). The idea is to identify hotspot farms which are already producing excellent conservation, and ask them to persuade their friends and neighbours to form a cluster of farms around their own hotspot in order to expand the conservation gain. The NGO stated that they had made approaches to a number of hotspot farmers they know, and that the idea had been met with immediate enthusiasm. Those farmers wanted the support of the NGO, CNPA and SNH in engaging, enthusing and supporting the neighbouring farms that might form the cluster.

Another specific suggestion was that the RSPB's approach to landscape scale conservation be followed - 'How to implement landscape-scale conservation: A recipe for success' (2015).

Some respondents highlighted examples of what they believed to be good examples of collaborative working e.g. Deer Management Groups, the East Cairngorms Moorland Partnership, Catchment Initiatives and Partnerships and the Peatland Restoration Project. Others suggested new partnerships, for example an agreement between NESBReC and the CNPA that any wildlife sightings or data from surveys could be sent to NESBReC and that NESBReC is operating a biological recording system on behalf of the CNPA.

The economics of woodlands was again raised as a means of encouraging landscape scale, with suggestions of timber being used for fuel wood and encouraging industries that use wood as a primary resource. Others felt that economic factors should not be the driver when making decisions about the landscape and that ecological science should lead the way. Others felt that funding from government was important.

The mapping of areas for collaboration was suggested. This partly came out of a desire to recognise that 'one size doesn't fit all' and that different approaches are required to accommodate the demands for community resources, recreation, and biodiversity etc. Clearly mapped areas of priority for contrasting woodland use, it was argued, would be a good first step to allow oversight, to explain how trade-offs are managed and enable different interest groups to feel included and accommodated in planning. A zonal approach to the prioritisation of woodland and its different uses was highlighted.

Some felt that the best way to ensure collaboration is to work with land owners and managers to achieve their existing goals while adding to other conservation efforts. Others disagreed arguing that they did not believe voluntary management or collaboration would work, citing the opinion that estates and partnerships such as deer management groups had been doing a poor job. They believed that direct intervention from the Government was needed to tackle the issue.

The need for better interpretation for visitors to the National Park was identified, to both enhance their understanding of the natural environment they have come to enjoy and enable them to make knowledge based decisions which will enable them to have a zero or positive

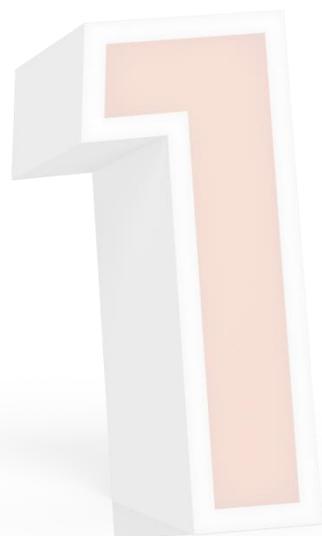
impact on the environment. Included in this is a better understanding of the Scottish Outdoor Access Code.

The provision of homes for people who work in, care for and manage the natural environment and manage visitors to the National Park was highlighted.

Specific habitats were highlighted, including the importance of creating and maintaining connectivity between woodlands.

Some highlighted the status of specific species such as freshwater pearl mussel, Scottish wildcat, red squirrel and capercaillie and that the focus should be on the conservation of these. Others disagreed about the focus on capercaillie, arguing that since it was common in other parts of Europe, its' conservation in Scotland should be a lower priority.

One responder noted that there is no mention of farmland or lowland ground in the 'Landscape Scale Conservation' section. They felt that the National Park's varied farmland forms an important ecosystem but has not been included in the issue which focuses on forest and upland practices. They argued that farming practices should be included.



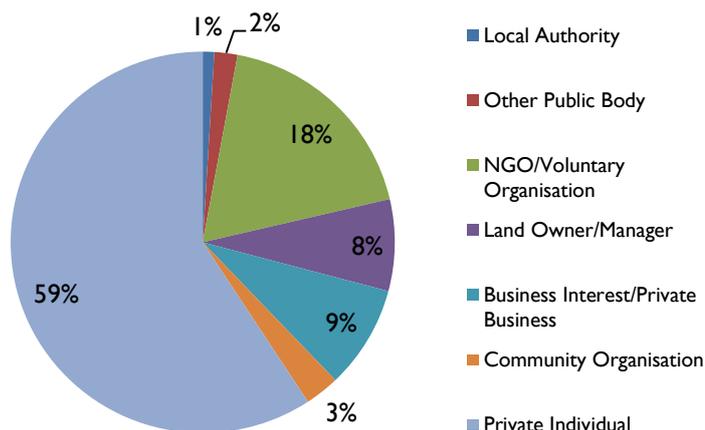
### Question 3: How can designated sites help deliver large scale ecosystem restoration?

#### Overview

Just under a third (33%) of all respondents answered this question, with responses being submitted by a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	1
Other Public Bodies	2
NGOs/Voluntary Organisations	19
Land Owners/Managers	9
Business Interests/Private Businesses	9
Community Organisations	3
Private Individuals	61
<b>Total</b>	<b>104</b>

Response by stakeholder group



#### Key points raised

- The management of designated sites could be used as an exemplar for management in other areas as well as a place to trial innovative new approaches to conservation.
- Connectivity between designated sites was seen as being important to both the condition of qualifying interest / features as well as the wider environment.
- Clarity is needed as to what 'restoration' means.
- Designated sites and the wider environment are in different and varied ownerships and therefore a considerable amount of partnership working is required.

#### Discussion

Examples were given where designated sites have already helped to drive large scale ecosystem restoration, especially woodland expansion and restoration in locations including Glen Feshie, Abernethy, Kinveachy, Mar Lodge, Ballochbuie and Craigellachie.

Suggestions were also put forward for how specific types of designated sites might be managed for the best outcome. For example, for many upland open ground habitats, restoration can be largely secured through managing grazing and trampling pressure by herbivores. In other situations, for example peatlands or wetland habitats, restoration may

require different management interventions (e.g. blocking drainage channels; re-seeding) or even developing new techniques.

Several respondents made the point that designated sites could be used to demonstrate and develop examples of best practice, to show good ecosystem management techniques and exemplar management that could extend beyond their boundaries. However, caution was added that focussing efforts solely on designated sites could detract from regional restoration works and recognition of wider areas of ecological importance (which may not be designated).

Others argued that designated sites should be used to research and demonstrate management options that will improve site quality and enhance land use such as shooting, stalking, fishing and farming. Demonstrating that sites can be restored without impacting on land management will be one of the most persuasive ways of achieving landscape scale ecosystem management.

Given the large area of the National Park protected by various types of designated sites, some were of the view that there is a unique opportunity to demonstrate wider ecosystem restoration using the designated sites as a basis for action. The benefits of broad-scale restoration would constitute a hugely informative resource and evidence base for other large-scale projects even where designated sites are not so prevalent. A coherent large-scale restoration plan would form the basis for this.

One NGO was keen to point out that there is clear evidence that designated sites already deliver significant benefits for nature conservation and society. They also said that they would be supportive of 'flexibility' where this will clearly result in the delivery of even greater benefits from designated sites for nature conservation.

The importance of the condition of qualifying features / interests was raised. It was argued that ensuring the landscape scale features / interests of sites are in favourable or improving condition will help deliver improved ecosystem function. Some felt that conservation objectives need to be better defined.

Connectivity between designated sites and habitats to support species such as capercaillie was seen as important by many responding to the consultation. It was argued that the biggest issue with these sites was not the sites themselves, but the areas around them. The management on non-designated sites can have a significant impact on designated areas. It was also expressed that designated sites should be increased in size, and both the connectivity between them and the ecological value of the surrounding countryside should be enhanced.

It was argued that there are problems with overlapping designations often conflicting with one another. While it is important that designations protect the most important sites and features, it was considered that reviewing how the existing designations work together was worthwhile. Furthermore, it was argued that targets for renewable energy development,

forestry expansion and food production can sometimes be in direct conflict with protected area objectives but can also offer significant opportunities for enhancing or complementing protected areas. Therefore, a coordinated, integrated and strategic approach must be taken to land use if the natural heritage in the wider countryside is to be protected and enhanced. The Scottish Land Use Strategy and National Planning Framework 3 should provide a mechanism to guide and inform the choices we make about land use and land management at a national, regional and local level in Scotland.

The point was made that designation site boundaries do not adhere to ownership/management boundaries but instead highlight the unique and special quality of a geographical area. Therefore in order to bring sites into favourable status, collaboration between different land managers, farm tenants and in partnership with the support of Scottish Natural Heritage (SNH) is required.

One respondent felt that there needed to be the better promotion and understanding of the Scottish Outdoor Access Code in relation to protected areas. They argued that the provision of well managed high quality facilities for outdoor recreation is critical to the landscape conservation approach; urgently required for Capercaillie and for other species. They also linked this to the provision of housing, arguing that there is space for well-designed houses and workspace in the countryside, set in forest clearings in the traditional way which would minimise impacts on the landscape. Others argued for greater separation of between recreation and conservation areas.

Capercaillie are the subject of considerable debate with some arguing for greater connectivity between sites to support their population and others questioning conservation objectives relating to their protection.

One NGO was of the opinion that there should be a core area in the National Park where nature comes first. While they recognised that there were some very good examples of habitat restoration taking place in the National Park they felt that overall objectives were failing at a landscape scale. There was however recognition that efforts are part of a longer term process.

It was argued that with the layering of multiple interests by designation, aiming to achieve 100% performance on all could result in nothing being done. Consequently the CNPA and others need to provide the leadership to ensure continuing sustainable management and use, with pragmatic application of designation constraints to support the achievement of the Aims of the Park in a co-ordinated way.

The opinion was expressed that designated sites should retain their current level of effort and funding and that they should sit, as the jewels in the crown, of a larger landscape that is better able to deliver environmental outcomes. However, there was also concern over whether or not it was realistic to devote the same amount of effort and budget to protect sites on top of finding funding to deliver larger scale ecosystem restoration. It was suggested that a more pragmatic approach may be needed that seeks small changes to land

management practice over a large area, in such a way that the working countryside is more compatible with environmental objectives and does not create unworkable restrictions. One respondent for example, argued that it was important not to be waylaid with a few minor pilot projects in tiny areas and instead to consider a wider approach. They cited the way that Norway has completely re-imagined its approach to forestry support by actively managing / reducing grazing pressures and encouraging a climate of support and understanding of the value of recovery of the woodlands.

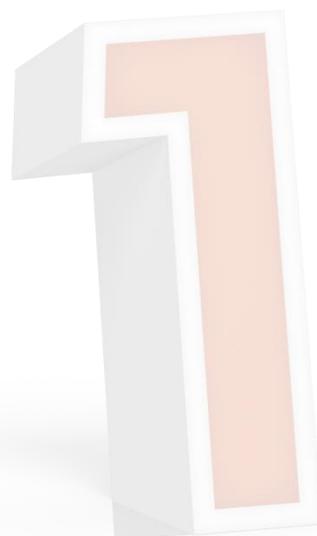
One NGO felt that the objectives of the NPPP did not go far enough and that there should be an aspiration that all protected areas in the National Park should be in favourable condition as opposed simply stating that they should be higher than the national average.

Concern was raised that there were too many groups with overlapping and unfocussed or overly specific interests and there needs to be a register on the CNPA website to ensure all interested can be appropriately informed.

Concern was raised over the suitability of certain designated sites and the accuracy of monitoring of qualifying/ protected features. One responder believed that politics and other pressures have biased the choice of what features to designate and/or their condition.

Some felt that sites are both a help and hindrance and that the presence of designated sites was of limited value in delivering large scale ecosystem restoration, unless they can lever in new funding sources. A post-Brexit scenario provides uncertainty and possibly opportunity in this regard.

Other comments included one respondent of the view that control of pet dogs on protected sites could help meet broader conservation objectives. Another queried the term 'restoration' and what the end product is meant to be i.e. what would the landscape and ecosystems look like. Finally a number said that they were not sure how to respond to the question as they felt that they were unclear as to what the terminology meant at all.



## ISSUE 2: DEER AND MOORLAND MANAGEMENT

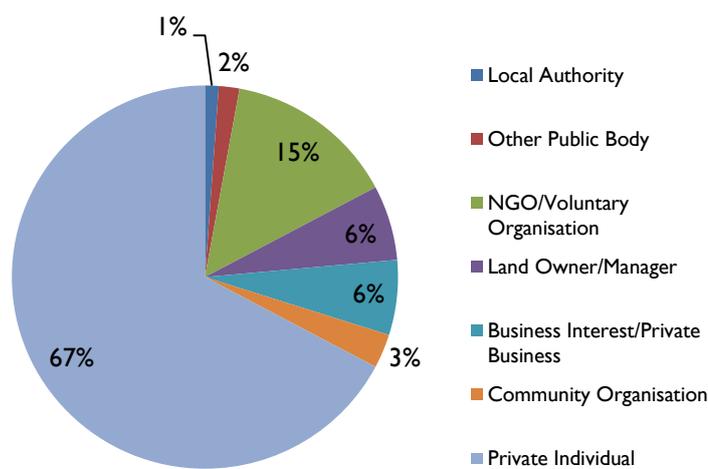
### Question 1: Should the Park Partnership Plan set guidance on the appropriate range of deer densities necessary to deliver the public interest?

#### Overview

Just over half (54%) of all respondents answered this question, with responses coming from a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	2
Other Public Bodies	3
NGOs/Voluntary Organisations	25
Land Owners/Managers	11
Business Interests/Private Businesses	11
Community Organisations	5
Private Individuals	117
<b>Total</b>	<b>174</b>

Response by stakeholder group



#### Key points raised

- Polarised views between the majority of private individuals and environmental NGOs, who felt the Partnership Plan should include deer density guidance, and the majority of land owners/managers, who felt deer density guidance is better left to Deer Management Groups and Plans
- Greater definition of the “public interest” was sought by many
- Scottish Natural Heritage recommended it would be more useful to outline the public interest outcomes that are highest priority for delivery in the Park

#### Discussion

The nature of responses to this question varied significantly – particularly between the different stakeholder groups.

In general terms, the majority of private individuals and environmental NGOs that answered this question felt that the NPPP should set guidance on the appropriate range of deer densities to deliver the public interest. The local authorities and most of the other public

bodies that responded to the question were also broadly supportive of setting density guidance within the Plan. Conversely, the vast majority of land owners/managers that answered the question did not believe it would be appropriate for the NPPP to include guidance on deer densities. Business interests and private businesses responded with mixed views, with some expressing clear support for setting density guidance within the Plan and others expressing clear opposition. Community group representatives responded with similarly mixed views, highlighting the need to achieve a balance between sporting and conservation interests.

Respondents across all stakeholder groups raised questions over the term “public interest”, with a number suggesting that this is open to interpretation and should be more clearly defined within the NPPP.

Those that supported setting deer density guidance within the NPPP expressed views that deer numbers should be managed to allow the whole ecosystem to flourish, and that appropriate densities should be based on the achievement of wider ecological priorities such as regeneration of native woodland and montane scrub, carbon sequestration, and flood mitigation. Respondents also stated that any such guidance should be based on the carrying capacity of key habitats, and others felt that including guidance within the NPPP would help establish consistency and provide a reference point for agreement. The importance of being able / willing to enforce any guidance on deer densities was stressed by some respondents. A number of responses called for ‘re-wilding’ opportunities to be explored, whilst others were in favour of reintroducing natural predators such as lynx and wolves to control deer numbers.

Of those respondents who were against setting deer density guidance within the NPPP, many felt that guidance/decisions on deer densities should be left to Deer Management Groups (DMGs) and Deer Management Plans (DMPs), which have a better appreciation of local issues, and to individual land owners / estates. Doubts were expressed over the ability of the NPPP to provide guidance on appropriate density ranges across the National Park, and questions were also raised by some as to why there should be a focus on deer and not other grazing animals. Some of those who were against setting deer densities within the NPPP pointed out the value of deer to the National Park’s economy. For example, it was noted that red deer are one of Scotland’s most iconic species and support local employment by drawing large numbers of visitors to the area for wildlife watching as well as for sporting reasons.

In more practical terms, a variety of respondents questioned how appropriate deer densities would be determined, and a number highlighted the need for close working with partners such as Scottish Natural Heritage and DMGs to set appropriate densities based on scientific and environmental research.

SNH commented that the key priority for the NPPP should be to encourage all parties to ensure the effective delivery of actions set out in the recently prepared DMPs. They

recommended that it would be more useful for the NPPP to set out the public interest outcomes that are highest priority for delivery within the Park through engagement with deer managers rather than to give guidance on deer densities, which they felt would be challenging to produce in any meaningful way. In addition, they suggested that the NPPP could promote working towards a future evolution of DMGs and DMPs into broader wildlife management groups and plans.

One respondent suggested a possible alternative approach based on setting guidance for deer weights and for browsing impact. They suggested that reductions in deer weights and/or browsing pressures not compatible with other conservation objectives could trigger increased cull levels until they are remedied.

In more general terms, one local authority recommended that the deer and moorland management issue should give greater attention to the protection and sustainable management of the historic environment.



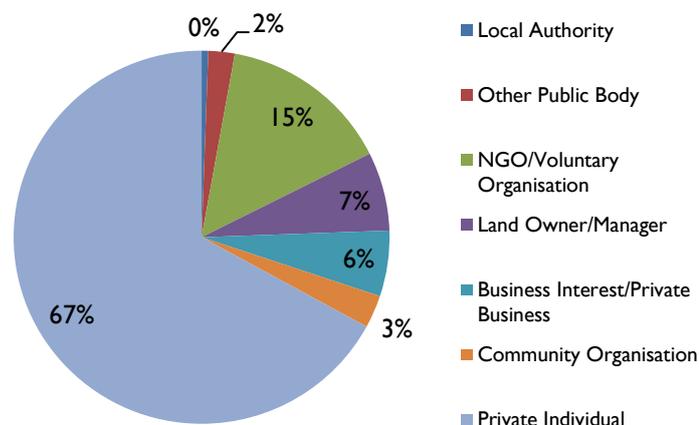
**Question 2: How can management for grouse be better integrated with wider habitat and species enhancement objectives such as woodland expansion, peatland restoration and raptor conservation?**

**Overview**

Just over half (55%) of all respondents answered this question, with responses being submitted by a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	1
Other Public Bodies	4
NGOs/Voluntary Organisations	26
Land Owners/Managers	12
Business Interests/Private Businesses	10
Community Organisations	5
Private Individuals	118
<b>Total</b>	<b>176</b>

**Response by stakeholder group**



**Key points raised**

- Strongly polarised views between those who felt management for grouse is incompatible with wider habitat and species enhancement objectives, and those who felt integration can/is being achieved
- Support expressed for more collaborative working, sharing of good practice, and testing/demonstration of new approaches in the National Park
- Desire for stronger approaches to addressing wildlife crime

**Discussion**

As with the previous question in relation to deer, the responses to the question on grouse management varied significantly, with often strongly opposing views being expressed.

In general terms, there was a clear group of respondents (largely private individuals and environmental NGOs) that expressed concerns over the extent to which grouse moor management can be integrated with wider habitat and species enhancement objectives. In particular, they expressed concerns about management practices including: muirburn;

drainage; the use of medicated grit; the use and construction of access tracks; fencing for animal control; raptor persecution; and the culling of other species such as mountain hares.

Many of these respondents felt that management for grouse was fundamentally incompatible with wider conservation objectives and stated that there should be an outright ban on moorland management for grouse to allow 're-wilding' to take place. Others commented that the most detrimental impacts seem to be associated with moors that are intensively managed for driven grouse shooting. Some therefore advocated a shift towards a less intensive approach to moorland management with a greater focus on walked-up grouse shooting. A large number of comments called for regulation through the licensing of gamebird shooting, along with stricter punitive measures for illegal activities, and called for the NPPP to take a leadership/enabling role in this respect.

Conversely, there was a clear group (including the majority of land owners/managers but also representatives from a range of other stakeholder groups) who felt that management for grouse is already well integrated with wider conservation objectives. A number of these respondents wished to emphasise the rarity of heather moorland habitat internationally, its importance in supporting other rare species such as curlew, lapwing, golden plover and other waders, and the significant contribution that it makes to the special character of the National Park. Respondents from this group pointed out that a range of peatland restoration and woodland regeneration projects have taken place across the Park in recent years, including on land holdings that run grouse shoots, and that it is possible to run good grouse shooting on moors that have a range of breeding raptors. Others also commented on the importance of moorland areas in terms of local employment and as one of the factors that attracts visitors to the area.

SNH proposed four cross-cutting work areas to help to improve the delivery of public benefits on grouse moorland. These included: improving a shared definition and understanding of healthy moorland ecosystems and sustainable moorland management; improving management standards; communicating key messages more effectively; and tackling wildlife crime.

A number of respondents suggested that the NPPP should promote further collaboration between landowners, statutory bodies and other key stakeholders to raise awareness of issues, share best practice and build on the progress that has already been made on habitat/species enhancement within the National Park. SNH commented that national projects are underway to improve guidance on sustainable moorland management, and recommended that the NPPP could usefully promote the National Park as a location to trial and demonstrate best practice in implementing these. Others suggested the use of training, along with demonstration projects and sites, to show how habitat/species enhancements have been implemented elsewhere. One respondent proposed a sustained education programme amongst the public as well as land managers to highlight key issues in relation to upland land management. Existing groups such as the East Cairngorms Moorland Partnership

were cited as being useful for collectively exploring ways in which management for grouse can deliver greater public benefit.

There were also suggestions that the NPPP should be used to promote the testing and demonstration of innovative approaches to addressing upland management issues. For example, a number of respondents felt that consideration should be given to introducing hunting bye laws for grouse shooting estates within the National Park. The RSPB suggested that a pilot grouse moor estate licensing project could be promoted within the Park.

Some felt that the NPPP should provide clear statements to support high standards in moorland management, including by promoting the Moorland Forum's developing Principles of Moorland Management, the Wildlife Estates Scotland initiative, and the forthcoming updated Muirburn Code. Others suggested that the Partnership Plan could identify 'no burn zones' to enable peatland and woodland regeneration in key areas, with some respondents stating that burning on areas of deep peat should be prohibited.

A number of respondents felt that employing dedicated project officers could help to build positive relationships with land owners/managers, citing the way that this had contributed to recent successes in terms of peatland restoration. The importance of providing financial support to incentivise habitat and species enhancement projects was also raised, with a number of stakeholders indicating a willingness to explore opportunities for peatland restoration if further funding were made available.

The wildlife value of heather moorland was reiterated by some respondents, who were concerned that there would be no overall benefit if this habitat were lost in order to create more woodland. However, a number of stakeholders indicated that riparian areas presented significant opportunities for woodland expansion within grouse moors.

A range of respondents felt that the NPPP should place more emphasis on tackling wildlife crime. Collaborative projects such as Heads Up For Harriers were cited by some respondents as the best way forward to make progress on raptor conservation, whilst others advocated the licensing of raptor population control. SNH suggested mechanisms to address wildlife crime including strengthening wildlife law enforcement capacity, new and expanded efforts on awareness raising, and using a wider range of available sanctions against land holdings or individuals where there is evidence of wildlife crime taking place (e.g. restricting the use of general licenses, withholding permission to use the Park brand and other accreditations/awards, and suspending public sector funding).

In more general terms, one local authority recommended that the deer and moorland management issue should give greater attention to the protection and sustainable management of the historic environment. SEPA also requested that there should be additional references to protecting existing soil resources. They therefore recommended that the fourth bullet point in the 'Issues' section of the consultation document should be reworded to refer to "...*protecting and restoring*...".

One respondent recommended that the Cairngorms Connect partnership should be added to the list of 'Mechanisms for Delivery' within the consultation document.



## ISSUE 3: FLOOD MANAGEMENT

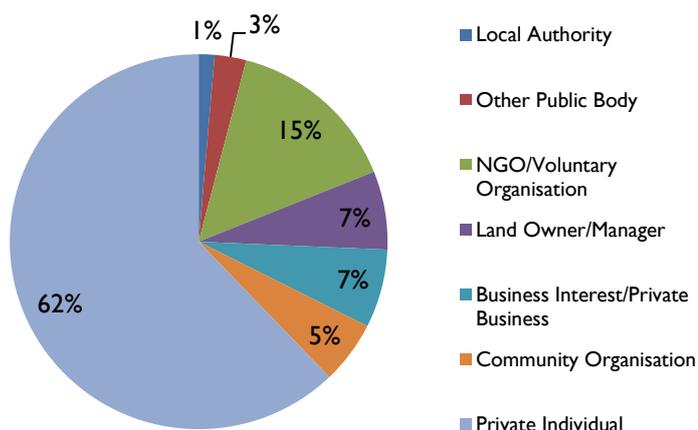
### Question 1: What land use changes are needed to deliver more effective natural flood management and how can they be supported/funded?

#### Overview

Just under a half (46%) of all respondents answered this question, with responses coming from a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	2
Other Public Bodies	4
NGOs/Voluntary Organisations	22
Land Owners/Managers	10
Business Interests/Private Businesses	10
Community Organisations	8
Private Individuals	92
<b>Total</b>	<b>148</b>

#### Response by stakeholder group



#### Key points raised

- A number of land use changes were suggested, the most common being woodland expansion, peatbog restoration, reforming grouse moor management and remaindering watercourses.
- There were polarised views on damming and blocking drains, with most arguing for and a minority arguing for the opposite.
- Two additional issues / objectives were identified:
  - Provision of adequate buffer strips along/around all waterbodies; and
  - Ensuring the historic environment is protected and managed sustainably.

#### Discussion

Common suggestions for land use changes were woodland expansion and tree planting, particularly in upland and montane environments and riparian corridors, the restoration of upland peatbogs, ponds and wetlands, ending or reducing current grouse moor management practices such as muirburn or ensuring that such practices are appropriately done, reducing

grazing by deer and domestic animals, re-meandering straightened watercourses, reinstating floodplains and other land use changes which 'roughen the ground' thus slowing the flow of water and allowing natural floodplains to flood. A more complex solution is to ensure that the peak flows from various parts of a catchment do not coalesce downstream at locations vulnerable to flooding, but rather pass that location at different times.

Other possible solutions commonly mentioned were the creation of large woody debris or 'leaky' dams, timber bunds and blocking of moorland drains. Some respondents recommended the reintroduction of species such as beaver to facilitate dam making and drain blocking. Conversely, other respondents believed that clearing ditches, drain reinstatement and the dredging of rivers could reduce flood events. Official, well-funded flood plans and infrastructure improvements were seen as useful, providing dialogue between all users of the National Park and community awareness.

Several respondents suggested that there should be no development on land with a 1 in 200 year probability of flooding. Another also suggested that re-assessing the planning assessment of the likelihood of flooding in the changing climate is needed. Further requests were made to consider flooding when allocating sites in the next LDP. However, SEPA were pleased to see that the issue of inappropriate development in areas of high flood risk is already highlighted in the NPPP. They argued that the cornerstone of sustainable flood risk management is avoidance of flood risk in the first instance. SEPA noted that they would expect a precautionary approach should continue to be applied when considering land use planning and land use vulnerability in the National Park, regardless of any potential improvements from natural flood management.

One respondent was keen to highlight the links between flooding and Issues 1 and 2 of the NPPP and that it was important that these issues are considered collectively.

One respondent highlighted a potential scheme at An Camas Mor where they claimed that there is an opportunity for combining a 2MW hydro- electric scheme with flood water retention. Other respondents also cited dams as good means of managing catchments.

It was noted that there needs to be a coordinated response to flooding, including communication protocols to support residents, businesses and visitors. However they believed that the barrier to progress was the perception that the planning process is too difficult and too long by which time the incentives may have dropped, so improvement to that would assist. It was noted that Local flood risk management plans set out the highest priorities in relation to flood management. In order to support delivery, promoting better understanding amongst stakeholders and local people on the causes and consequences of flooding, and the respective pros and cons of natural and other flood management techniques in different types of situations is needed.

Several respondents, including businesses, government bodies, NGOs and private individuals suggested that the emphasis of the issue should be on 'natural flood management'. SEPA however noted that Natural Flood Management was identified as a way of restoring

functioning river systems. While they supported a catchment approach to address flood risk, they also highlighted that the current understanding of the benefits of incorporating natural features into flood mitigation measures is still in its infancy. They therefore cautioned that any proposals for natural flood management practices will need to be carefully considered to ensure that they are appropriate and do not increase flood risk elsewhere.

SEPA are of the opinion that more prominence should be placed on flood avoidance and safeguarding the functional floodplain and requested that this be moved to the top of the list of issues.

Some suggested that there should be regular monitoring of existing drainage measures.

It was also suggested that the economic benefits of natural flood management measures is emphasised; for example, preventing agricultural run-off ensures that top soil is not lost and similarly that fertilisers and pesticides are not lost to river systems but instead do the job they are intended to do. Measures which slow the flow and also improve water quality are beneficial to wild fisheries. Planting schemes can provide shelter for livestock and can be commercial in nature. It was suggested that a role for the CNPA could be to identify the measures that landowners and managers may be willing to fund because they confer a business benefit and ensure that owners and managers in the National Park are aware of these.

Concern was however raised over the economic impact of these land use changes, with one respondent stating that the challenge in delivering such measures is ensuring that they occur in a way that either enhances or at least has a neutral impact on the economic viability of land holdings. For example it was argued that in some instances there are little or no financial benefits to land use changes and choices need to be made by landowners and managers over whether they undertake commercial activity or whether they do something for the environment or that is in the public interest.

If there is no economic benefit to the landowner, it was argued that funding and other support such as information and advice is very important. Under such circumstances it was also argued that funding must be made available to encourage and compensate adequately for changes in land use. It was argued that financial risks should not be borne by the landowner/land manager. Funding sources such as SRDP were raised as possible funding sources. Several respondents proposed that subsidising shooting estates should be stopped and the money used for habitat restoration and flood management.

It was suggested that the issues concentrated too much on large scale flooding and that smaller events such as paths and bridges being washed away should also be looked at. The issue of small scale flooding, it was argued, affects many users and impacts on people's ability to get around or their enjoyment of the countryside. This smaller scale flooding can badly affect local access for walkers and cyclists etc. and therefore affects other issues in the Big 9, e.g. Issue 5 Active Cairngorms. It was asked if there was an alternative to insurance as a means of replacing damaged paths. Another suggestion was assessing the potential impacts

of increased speed of run-off, deposition of sediment into water courses through track erosion, and consequent additional flood risk when considering new and re-routed paths and tracks.

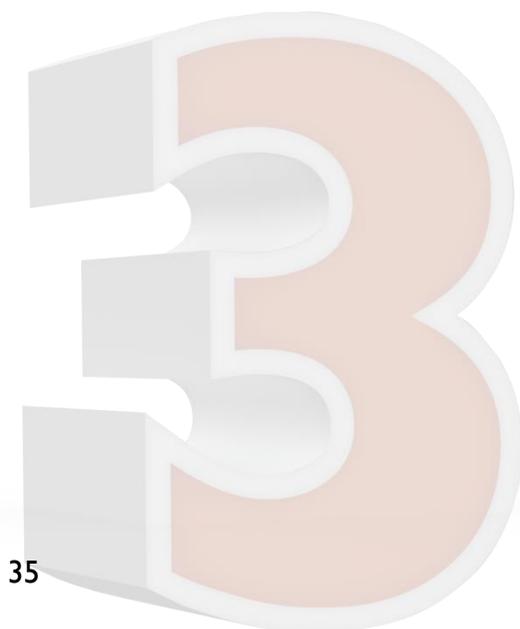
SEPA were of the opinion that small watercourses and surface water flooding should also be taken into consideration as well as the more populated areas and larger rivers. Adding an appropriately worded bullet point to the Targets/Preferred Direction box may be one way of including these issues within the NPPP. A suggested bullet point is below:

*'Provision of adequate buffer strips along/around all waterbodies'*

One respondent argued that flood defence/management proposals would have a potential impact on the historic environment both directly and indirectly (i.e. direct impact where defences/management occurs, indirect potentially downstream of installed management/defences as flood/river pattern is managed and changed). They therefore felt that there was scope to add a new issue to the NPPP:

*'Ensuring the historic environment is protected and managed sustainably'*.

It was also raised that there is a need to be prepared to react to future flood events in a way that minimises the impact on our economy and communities.

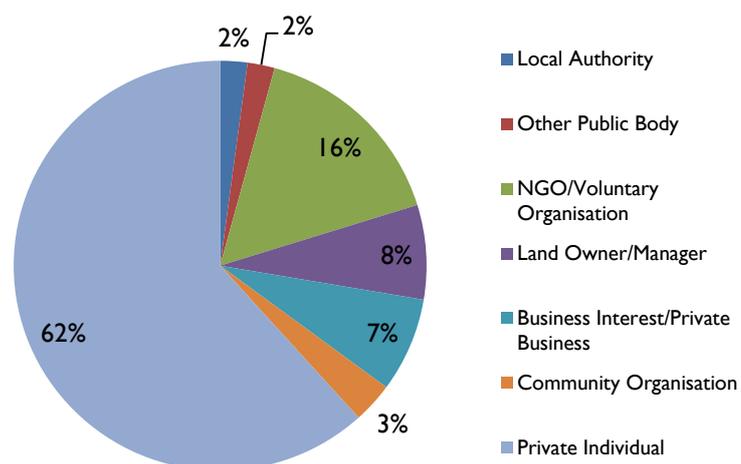


## **Question 2: How can catchment management partnerships be better used to help deliver natural flood management as part of flood risk management?**

### **Overview**

Just under a third (29%) of all respondents answered this question, with responses being submitted by a range of stakeholders.

<b>Respondent Type</b>	<b>No. of responses</b>
Local Authorities	2
Other Public Bodies	2
NGOs/Voluntary Organisations	15
Land Owners/Managers	7
Business Interests/Private Businesses	6
Community Organisations	3
Private Individuals	58
<b>Total</b>	<b>93</b>



### **Key points raised**

- It was felt that catchment management partnerships are able to provide strategic direction in identifying methods and priorities for natural flood management.
- Partnerships can play a role in bringing various interests together.
- Catchment Management Partnerships already promote many best practice approaches which also deliver flood management benefits.

### **Discussion**

The main feeling about catchment management partnerships was that they were able to provide strategic direction in identifying methods and priorities for natural flood management. SNH felt that partnerships are well-placed to promote key messages about natural flood management, partly through demonstration sites, and have credibility that helps to communicate the message across and hence increases the opportunity for NFM measures to be replicated and up-scaled.

Partnerships were identified as having an important role in gaining a better understanding of how floods are generated in a catchment and how land use and management affects the speed and volume of flood flows.

The ability of partnerships to play a role in bringing the various interests together enables areas of potential conflict to be tackled and hopefully reach a general consensus and level of understanding to support the delivery of practical projects on the ground.

The current work of partnerships was highlighted by SNH who made the point that they already promoted many best practice approaches which deliver flood management benefits e.g. buffer strips to intercept soil and water runoff, peatland grip blocking, tree planting, river bank restoration. The point was made that there are a range of scales of NFM measures, for example from large scale tree planting to placing woody debris in streams. Different NFM measures are also appropriate in different parts of a catchment or in association with different land uses. Catchment management partnerships are used to working in this multi-scale way across a catchment.

The point was raised that from a flood risk management perspective that NFM measures may make a small contribution towards reducing or slowing flows on large flood events but they can also be used to manage smaller scale floods or more localised flooding. Small scale measures may make a useful contribution to local flooding issues to the sub catchment of a larger river catchment.

Caution was raised about the ability to fund catchment wide natural flood management projects. There was a view that securing on-going funding for the partnerships to continue to deliver will be challenging given current public sector funding constraints and therefore new funders are likely to be needed.

Several respondents did not answer the question directly but asked for woodland expansion, the introduction of European beaver, drain blocking, reform of grouse moor management and slow release dams to be used as natural flood management techniques.





## VISITOR EXPERIENCE CHALLENGES

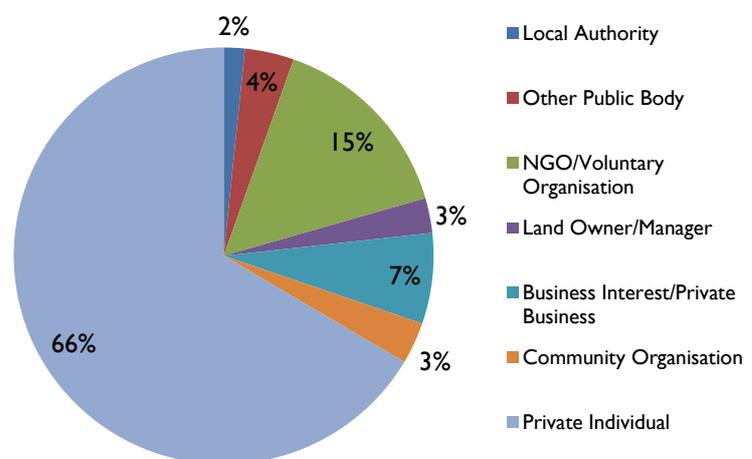
**Question: Do you agree these are the big challenges we should be addressing through our next Partnership Plan?**

### Overview

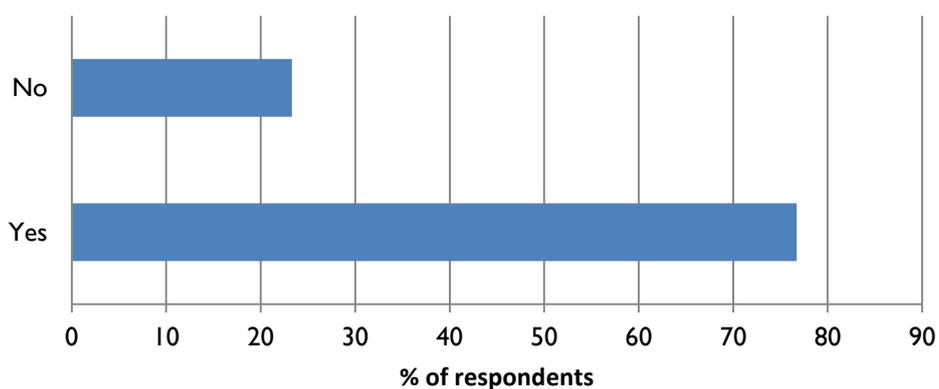
Just under half (58%) of all respondents answered this question. Responses were received from a range of stakeholder groups as show below.

Respondent Type	No. of responses
Local Authority	3
Other Public Body	7
NGO/Voluntary Organisation	28
Land Owner/Manager	5
Business Interest/Private Business	13
Community Organisation	6
Private Individual	123
<b>Total</b>	<b>185</b>

**Response by stakeholder group**



### Do you agree these are the big visitor experience challenges?



**BIG**

### Key points raised

- Significant level of agreement that these are the big visitor experience challenges.
- General support that there is continued need to balance the protection of the environment with supporting and enhancing visitor experience.

### Discussion

The majority of respondents (77%) agreed that these are the big visitor experience challenges that should be addressed through the next NPPP.

Of those in agreement, a number stressed that these priorities must be balanced with the need to protect the natural environment. Others identified that the quality of tourism experience could be improved with a friendly welcome while others supported greater learning and education about the National Park for both residents and visitors as well as greater promotion for health and well-being. One respondent highlighted the need for future plans to take better account of Scotland's disabled population.

It was raised that recreation opportunities, infrastructure and development should be appropriate to the context of the National Park. One respondent felt that there are limits to the expansion of the tourist offer whilst another felt that economic activities should always be considered when enhancing visitor and recreation opportunities and utilising non-seasonal development.

Others highlighted the need to raise the profile of the National Park as a UK and international destination, along with developing the CNP branding. Prioritising digital connectivity was identified by a number of stakeholders who felt it is essential in providing information and access to services for visitors.

It was also added that active travel and improved transport infrastructure are central to visitor experience and that the Cairngorms Outdoor Access Trust should be identified as a mechanism for delivery.

Of those who disagreed with the challenges, many also raised similar points surrounding the need to balance increasing visitors with the qualities of the natural environment that make the National Park so special. A number of respondents suggested appropriate visitor management, such as restricting access to particularly sensitive areas and promoting recreation in less sensitive locations. It was also highlighted that there is a need to educate and promote responsible behaviour in the National Park.

Respondents also highlighted other issues that they feel are 'big challenges' including the provision of visitor accommodation at all levels, the loss of tourist information centres (such as Grantown), transport, which is a critical challenge for both residents and visitors, and skills development to serve visitors.

## ISSUE 4: VISITOR INFRASTRUCTURE

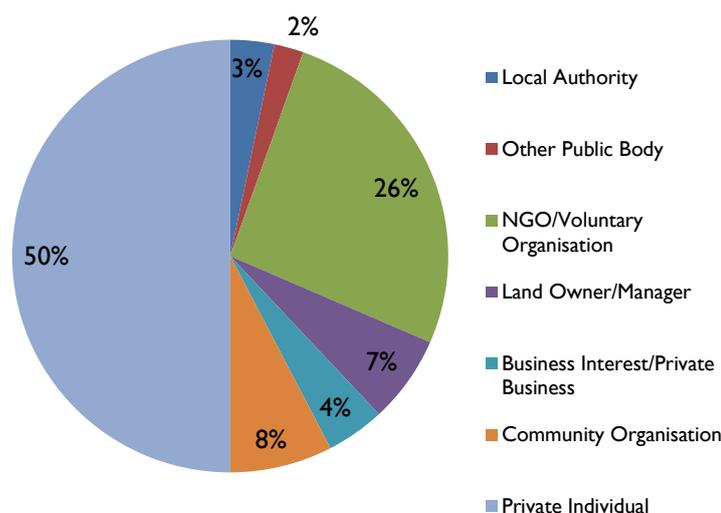
### Question 1: Have the right visitor infrastructure investment priorities been identified, or are there others that should be included?

#### Overview

Over a quarter of respondents answered this question (29%).

Respondent type	No. of responses
Local Authorities	3
Other public bodies	2
NGO's/ Voluntary Organisations	24
Land Owners / Managers	6
Business Interests / Private Businesses	4
Community Organisations	7
Private Individuals	46
<b>TOTAL</b>	<b>92</b>

Response by stakeholder group



#### Key points raised:

- Support expressed for identified visitor priorities.
- Additional opportunities identified to encourage and develop accessible active travel routes, particularly around settlements.
- Need to improve accommodation provision and visitor information both online and through visitor information services.

#### Discussion

Private individuals (50%) and NGO's/Voluntary Organisations (26%) formed the greatest proportion of respondents to this question.

There were a number of respondents who felt that visitor infrastructure in the National Park is already good. However others felt that there is an imbalance in terms of investment in infrastructure and visitor numbers across the Park with some of the view that there is a

western bias with greater focus in Badenoch and Strathspey – particularly around Aviemore, Glenmore and Cairngorm. NGO's including the John Muir Trust and COAT felt that the focus on visitor infrastructure and experience should be extended across the whole Park.

#### *Path networks*

A large proportion of respondents to this question agreed that core paths should be an infrastructure priority. Many respondents acknowledged that progress has been made on the National Parks path network, however many opportunities for improvement were identified with one respondent highlighting greater investment in paths is needed – particularly in upland areas - for protecting the fragile environment as they guide users in an environmentally considerate way. COAT suggested reviewing the Core Paths Plan in future to see if there would be advantages in increasing the network.

Agreement was expressed for Active Cairngorms aim of 100% of core paths being barrier free and signposted by 2020. However it was raised that the importance of local networks should not be forgotten and the path grading system for Scotland should be used. However concern was raised by some NGO's about the resources and capacity required to maintain an extensive network of paths, particularly following severe events such as the flooding around Ballater. One individual felt that the Plan appears to 'lack ambition' in respect of improving path networks and that work needs to be carried out to calculate what is required to deliver the necessary works. One NGO suggested that more funding for path maintenance could be generated from car parking such as has been done at the Spittal of Glenmuick car park. It was also raised that completion of the Mountains and People's Project by 2020 should be identified as an investment priority.

A number of respondents from across all stakeholder identified that the path network in the east of the Park requires attention. One NGO expressed concern that there does not appear to be any plans assessing the adequacy of overall path infrastructure and future needs – the paths in the eastern part of the National Park are fragmented and not adequate. It was also felt that investment to extend the Deeside, Speyside and linked path infrastructure should be prioritised. Another respondent identified the GT22 (Tomintoul to Glenmore via Dorback) as requiring specific investment.

#### *Active travel*

A number of Voluntary Organisations /NGOs were of the view that an investment priority should include developing and improving green and active travel networks (and their interconnectivity). It was also suggested that these routes should seek to cater for a wide range of users and abilities and there should be accessible information about them. Sustrans expressed was in support for a proposed Active Travel Hub in Aviemore, while other respondents were of the view that the path networks need to better connect to communities to support their use as active travel routes (which is important for achieving NP aims).

### *Recreation infrastructure*

A number of stakeholder groups felt that there are a number of opportunities to develop and improve key recreational and visitor infrastructure. It was highlighted that the existing built infrastructure desperately needs attention and support. There are many vernacular buildings falling into disrepair which is an important part of the area's history and culture. Use should be made of these buildings for a range of uses which could support tourism.

A number of respondents – both individuals and NGOs – felt that there was 'untapped scope' for Aviemore to become a mountain biking hub through the development of 'world class' facilities. It was also suggested that there should be investment in promoting snow and winter activities such as cross country/Nordic ski routes as well as canoeing (including improving launching/landing facilities).

Specific reference was made by a number of respondents to Glenmore and Cairngorm. One individual was of the view that these infrastructure projects seem to be lacking 'ambition or imagination'. Another felt that the Glenmore consultation did not identify appropriate solutions to the issues whilst others were of the opinion that Cairngorm looks like an 'eyesore' and further concerns were raised by the John Muir Trust in respect of landscape impact.

It was also suggested that Tomintoul & Glenlivet is included with Cairngorm and Glenmore for improvements ensuring that HLF investment is matched by the quality of visitor experience.

It was raised by some respondents that more investment is needed in accommodation provision. Currently accommodation is costly and there are no more affordable options that would enable people to get more in touch with nature such as eco hostels / bothies or places where people can stay to volunteer or for educational field visits. It was also suggested that there should be greater promotion of the National Park for educational uses and field trips.

A number of respondents highlighted that existing caravan and camping facilities are insufficient and there is a need for more sites for camping. The issue of wild camping was also raised and it was felt that any solutions should be proportionate, low key and sensitive.

### *Scenic Routes*

Some Voluntary organisations expressed support for more scenic routes, potentially with a more biodiversity focus. Other respondents, including an NGO suggested capitalising on the investment in the A9 dualling and pursuing a more ambitious initiative to develop larger layby/pull-ins with viewpoints with supporting interpretation/information.

### *Transport infrastructure*

A high number of respondents from across all stakeholder groups were of the view that good transport infrastructure is vital in supporting visitor experience. However many highlighted that there is a significant lack of public transport infrastructure and there is poor integration between transport types which is not conducive to easy movement within the National Park. It was raised that public transport is non-existent in some areas for example between Tomintoul and Ballater / Braemar. As a result, visitors and residents are highly dependent on cars, even just to access local path networks or activity hubs e.g. Cairngorm Mountain.

It was also added that road infrastructure (outwith the A9) could be improved with one respondent specifically highlighting the Gairnside to Crathie and Donside to Deeside Roads.

### *Cultural Heritage*

A number of respondents highlighted the need to support and promote cultural heritage in enhancing visitor experience. Historical features and Gaelic music and language were identified as mechanisms for encouraging engagement in cultural heritage. Aberdeenshire Council feel there is scope to add a 'protection and management' of historic environment as an issue to emphasise awareness of it. Another respondent highlighted the need for improved display, information and interpretation of historic heritage.

### *Visitor Information*

There needs to be a focus on educating visitors (and residents) of our collective role in preserving the beauty and wildlife of the National Park (particularly dog control, litter, damage). In addition, it suggested by one landowner that more information could be provided within communities to educate visitors about the surrounding countryside including its economy, environment and community.

A number of respondents expressed support to strengthen and improve ranger services which are an important delivery mechanism for visitor experience. It was felt that investment is needed in training and equipping individuals to work in ranger services however Highland Council felt that reducing CNPA funding to the Ranger service is counterproductive and could affect partnership working.

Some respondents felt that tourist information centre provision should be improved, with one suggesting that they should be developed in all communities across the National Park. It was also raised that they should be open in evenings and weekends, as well as more year round and do not necessarily have to be provided by VisitScotland. Moray Council also highlighted that visitor information should tie in with and refer to surrounding areas.

Improve CNPA web page to provide more information and specifics in terms of experiences within the National Park and suggest routes/things to do for first time visitors to enable them to see the best of the National Park. It was also raised that that the National Park

should be a world leader in customer service standards and there need to be more mechanisms to help deliver this. In connection with this, another respondent felt it is important that attractions, services and facilities can be easily contacted and booked online as well as the development of some form of App that could provide accessible visitor information.

#### *Other*

Other issues raised included signage - one respondent felt that there is unnecessary signage whereas others felt that it could be improved and more brown signage for visitor attractions are needed. It was also raised that disabled access, parking and facilities should be improved including picnic benches for wheelchairs. The National Trust for Scotland also highlighted the importance of the support structures which keep adventurous visitors safe (Heading for the Scottish Hills, Avalanche information service and Mountain Rescue) as being an ongoing priority.

It was also highlighted by the NGO stakeholder group that there needs to be a strong focus on effective partnership working to deliver improvements, particularly where there are financial and investment constraints. The Highland Council mirrored this view, suggesting more innovative solutions and shared services will be required.



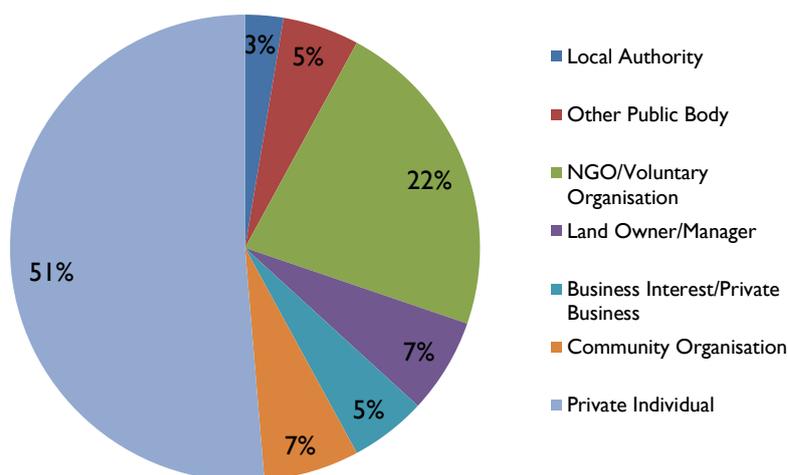
## Question 2: How can the quality of visitor welcome be improved?

### Overview

24% of respondents answered this question.

Respondent type	No. of responses
Local Authorities	2
Other public bodies	4
NGO's/ Voluntary Organisations	17
Land Owners / Managers	5
Business Interests / Private Businesses	4
Community Organisations	5
Private Individuals	39
<b>TOTAL</b>	<b>76</b>

### Response by stakeholder group



### Key points raised:

- Visitor experience and welcome could be improved through greater availability of information about basic services as well as what the National Park has to offer both online and through the development of more tourist information services.
- Staff and business training initiatives such World Host and CNPA's 'Make it Yours' to help give visitors an improved and more informed welcome.
- Support for improved visitor interpretation on travel routes (including paths) along with a greater range of accommodation provision.

### Discussion

The majority of respondents who answered this question were private individuals (51%). There were a range of suggestions for improving the quality of visitor welcome, with many stakeholder groups raising similar issues.

#### Visitor information

Individual and other public body groups, including SNH highlighted the importance of personal interaction in providing a good visitor welcome. Respondents from most stakeholder groups identified training initiatives as a way of improving visitor welcome,

building local knowledge and promoting the National Park. Suggestions included using schemes such as WorldHost, Discover Aberdeen & Aberdeenshire, VisitScotland QA scheme, CNPA's 'Make it Yours' and potentially via the Country Sports Tourism Group (for sporting businesses). It was also raised that there should be a consistent message / narrative for visitors which focuses on the natural environment and promotes the 'Park experience'.

SNH suggested visitor welcome could be improved through business networking and information exchange. In addition, familiarisation opportunities for businesses specifically in relation to natural heritage would also be beneficial. Another individual suggested that awareness raising between businesses could help them understand what each other offer, support collaborative working and improve visitor welcome and experience.

One individual identified the need for specific training for accommodation providers which focuses on improving visitor welcome and encouraging hospitality excellence. Another suggested facilitating training for land managers and co-ordinating this with training for National Park Rangers.

One Local Authority was of the view that new and improved Rangers services are important for delivering a high quality welcome within the National Park. Furthermore, a landowner felt that the Partnership Plan should include how Ranger bases will be used in the future and strategic level discussion is required regarding resourcing for rangers.

Some individuals felt that greater participation from local communities should also be encouraged such as through volunteering opportunities and for example getting local people involved in guiding and leading walks for visitors.

The availability of visitor information was raised by a number of stakeholders. It was felt by the Cairngorms Local Outdoor Access Forum and others that the availability of basic information needs to be improved including parking information, how to access path routes and where toilets are located. It was also felt that better signage could support this.

Others suggested developing tourist information hubs (potentially private tourism businesses with extended season opening) in strategic areas such as Aviemore which can offer a 'one stop' place for information and guidance. CBP suggested developing visitor information points with National Park branding that could replace community run Visitor Information centres. It was also raised that limited opening times of many visitor facilities, especially in the off season make it difficult to engage with visitors and may put them off returning. Ensuring the availability of timely information for visitors is key for supporting visitor welcome.

The need to deliver broadband/4G was also raised along with improving online information. CBP suggested that consideration should be given to CBP running the visitor facing element of the CNPA website as the most important source of visitor information.

### *Visitor attractions and infrastructure improvements*

A greater sense of arrival was identified by the Cairngorms Business Partnership as being important for improving visitor welcome and it was highlighted that the A9 offers an opportunity to do this. SNH also expressed support for the A9 as a scenic route and improving visitor welcome in Dalwhinnie as a gateway location. It was also suggested that improved visitor interpretation and signage throughout the National Park could promote cultural heritage such as Gaelic language and culture.

A number of respondents highlighted that improvements to path networks would help improve visitor welcome and experience. It was suggested the national Path Grading system for Scotland should be used. Sustrans suggested incorporating the old logging way and sections of the Speyside Way into the NCN to level additional route awareness. They also identified the need to utilise Active Travel routes and identified a need to develop relationships with public transport providers.

Respondents from a number of stakeholder groups raised the need to retain and support a natural environment as a key part of improving visitor welcome and experience. One respondent expressed concern about the development at Cairngorm which they felt should not be permitted where it reduces the quality of the landscape. Others highlighted that action needs to be taken to improve Cairngorm (remove decaying buildings and litter) to develop new uplift facilities that can be used in both summer and winter.

### *Accommodation provision*

A number of respondents were of the view that the current accommodation provision does not meet the needs of visitors. One felt that there is a need for more basic accommodation (such as bunk house), particularly to support 'green tourism'. Others highlighted that there is the lack of basic campsites in the National Park and felt that the National Park Authority should support the establishment of more campsites whilst continuing to manage areas popular for wild camping. It was noted however that camping and caravanning are often listed together however they have different users seeking contrasting experiences which should be recognised. It is suggested that data is collected to better understand the trends surrounding this issue.

### *Other*

VisitScotland highlighted that they would welcome the opportunity to work with CNP to look at piloting a 'total quality destination approach to visitor infrastructure...and experience'. This would include examining and gathering data on aspects such as web presence, information, transport and attractions to highlight gaps in existing infrastructure provision and weaknesses in visitor experience. VisitScotland and others highlighted the importance of partnership working and the need for businesses to work together as well as with the National Park Authority to improve the marketing of the Park and to develop a consistent brand image.

It was also raised that the targets for the 'Visitor Infrastructure and Experience' section need to be more focused with timescales. In addition a mechanism for delivery should include the refreshed Tourism Development Framework. VisitScotland are also working with CNPA on a new Customer Experience Information Strategy which should be acknowledged in the Partnership Plan.

The National Trust for Scotland also highlighted that the National Parks Interpretation Strategy should ensure it explains accessing the hills to visitors and a Gaelic policy in line with national best practice.



## ISSUE 5: ACTIVE CAIRNGORMS

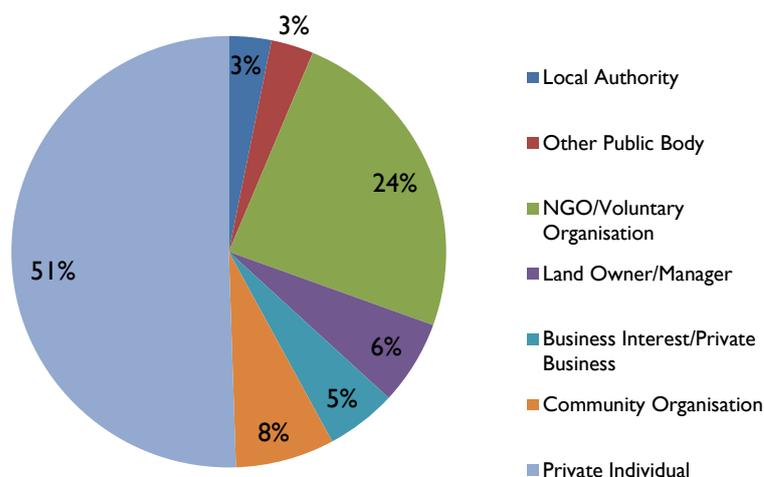
### Question 1: How can levels of physical activity among residents and visitors be increased?

#### Overview

30% of respondents answered this question.

Respondent type	No. of responses
Local Authorities	3
Other public bodies	3
NGO's/ Voluntary Organisations	23
Land Owners / Managers	6
Business Interests / Private Businesses	5
Community Organisations	7
Private Individuals	48
<b>TOTAL</b>	<b>95</b>

Response by stakeholder group



#### Key points raised:

- A greater range of activities for all abilities is needed along with suitable infrastructure such as accessible path networks, particularly around communities.
- Working in partnership to support initiatives to encourage increased activity for everyone.
- Improved public transport and indoor facilities.

#### Discussion

##### *Promoting physical activity*

The majority of respondents to this question were private individuals (51%). A number of respondents in this group felt that physical activity has to be individually motivated and only so much can be done to encourage people. Other respondents highlighted that visitors tend to already be active and that's why they come to the area, so different approaches are required for each group.

One individual was of the view that activities requiring a more modest fitness level should be promoted to attract a wider audience. Too much emphasis on adventure sports can be physically and financially intimidating. The NHS explained that often social connection is a greater motivation to physical activity so directing people to enjoyable and accessible opportunities can be more successful. The NHS and respondents from a number of stakeholder groups expressed support for promoting and focussing on activities connected with the identity of the National Park such as enjoying nature, ranger led walks, nature trails and orienteering (competitive and non-competitive). Another respondent suggested 'taster' and 'learning' sessions in different activities could be provided whilst one Community Organisation suggested accessible trails that focus on the cultural and natural heritage of the area.

Making it easy for people to participate in activities such as free and low cost opportunities is important. A number of NGO's highlighted that individuals need support (through groups) to build confidence to become more independent and adventurous. Another suggested that training could be provided - such as simple map reading and navigation - to help build people's confidence.

VisitScotland was of the view that enhancing the quality and ease of accessing information about activities within the National Park online and through social media could help increase activity. Another individual suggested creating an 'Activity pass' for visitors allowing discount on local interactive activities e.g. Cairngorm, Landmark and Wildlife Park.

#### *Working with Active groups*

A number of other public bodies and NGO groups identified the opportunity for a partnership approach between activity providers and professionals throughout the National Park to engage with people and promote activities. SNH further supported this adding that a strategic partnership with the NHS and other health and social care organisations is needed to encourage physical activity using a wide range of approaches. A number of respondents from across stakeholder groups suggested closer working with a range of community organisation such as Schools, Sports and Leisure services and sports clubs to promote what they offer.

It was suggested that more adventurous activity providers could promote and offer incentives to local residents particularly to encourage them to get involved. An NGO felt that there should be greater mention of adventure recreation as it is what the area is known for and it plays an important role in getting people active.

Individuals and the RSPB suggested that CNPA could sponsor activity programmes or organise challenge events such as an annual Walk Cairngorms event with opportunities for all abilities. In addition, Sustrans expressed continued support for the 'Walk to Health' scheme and suggested potentially developing a 'Cycle to Health' scheme. Inclusive Cairngorms encouraged the promotion of 'Wee walks' (not 'health walks') and suggested more could be done on branding.

Walking groups and health walks were also highlighted by a number of respondents including community groups as being successful mechanisms for promoting physical activity and should continue to be supported. Another NGO expressed support for initiatives such as the Spirit 2012 programme including regular volunteer-led health walks. Ramblers Scotland also expressed support to form volunteer led walking groups that could cater for a wider range of abilities.

It was suggested by another that schools should establish walking groups as well as other initiatives such as Active Schools balance bike project, Cycling Scotland's 'play on pedals' and 'Safe Routes to Schools'.

A couple of NGO's suggested land based volunteering and education activities could be used to encourage people and families to get active. Another highlighted the opportunity that the new volunteer co-ordinator for CNPA will provide in support environmental volunteering including Rangers. Support for a 'pro-active and well-resourced Ranger Service' was expressed by one landowner which they felt is key to increasing participation and providing a range of outdoor activities.

#### *Path and recreation Infrastructure*

Respondents from across all stakeholder groups were of the view that ensuring and maintaining high quality infrastructure and information for outdoor recreation and active travel is key for encouraging physical activity. Many felt that path networks and walking routes should be promoted across the National Park with others identifying a need for more long-distance trails, cycle paths and active travel routes around towns and villages to encourage increased activity. It was highlighted by a number of respondents from all stakeholder groups that paths need to be accessible for all abilities including disabilities, families and push chairs. It was noted by others that dedicated cycle routes should be established along main routes (Aviemore to Grantown and Carrbridge to Grantown were suggested) and places of interest and where there is high car usage. Providing cycle infrastructure such as bike shelters /parking/wash facilities is also important to make cycling easy.

The National Trust for Scotland noted that core paths should be accessible for all and should take cognisance of 'A Good Practice Guide to Countryside for Disabled People' and grade paths based on 'Path Manager's Guide to Grading Version 3'.

It was raised that paths and routes should be well signposted with appropriate information, particularly in more upland paths to help encourage less confident walkers to go further. One individual felt that more needs to be done in Glen Feardar, Deeside where there are no leaflets or marked routes to promote it. In addition, one Local Authority felt that path improvements in places such as Glen Feshie and Loch Morlich could be extended and also supported by appropriate signposting and web resources.

A couple of respondents expressed support for developing mountain biking trails and a centre near Aviemore while Transform Scotland expressed particular support for developing Aviemore as an active travel centre which could improve connectivity to the surrounding area. Some individuals felt that walking and cycling/mountain biking routes should be separate as mountain biking can be hazardous to walkers. However others were of the view that they should be able to co-exist.

### *Public Transport*

The need for improved public transport to support more joined up activity opportunities was highlighted by CLOAG e.g. bike on bus/train and cycle back. Public transport provides access to recreation facilities and therefore needs to be better equipped to carry equipment such as bikes. One landowner highlighted that transport links are only referred to in relation to Aviemore and other places in the National Park such as Braemar should also be highlighted.

### *Indoor facilities*

It was raised by some private individuals that indoor facilities are also important for encouraging activity particularly in the darker winter months. Strong support was expressed by a couple of respondents for the existing Highland High-life system which they felt is successful. It was also suggested that free admission or introductory sessions would encourage activity.

### *Other*

Partnership working was highlighted by Sustrans who felt that a collaborative approach involving strategic partners is central to improving public transport and identifying joint priorities for improving walking and cycling infrastructure, facilities and activities.

One landowner raised the issue that the Land Reform (Scotland) Act 2003 introduced free non-motorised access which means that landowners cannot charge for mountain bikers using their land. This means that there is little incentive for estates to improve or develop facilities to increase activity. One business interest added that whilst they are supportive of improving infrastructure that facilitates physical activity, there has to be a business case to do so.

It was raised by a couple of NGOs that country sports provide opportunities to increase physical activity which has not been acknowledged.



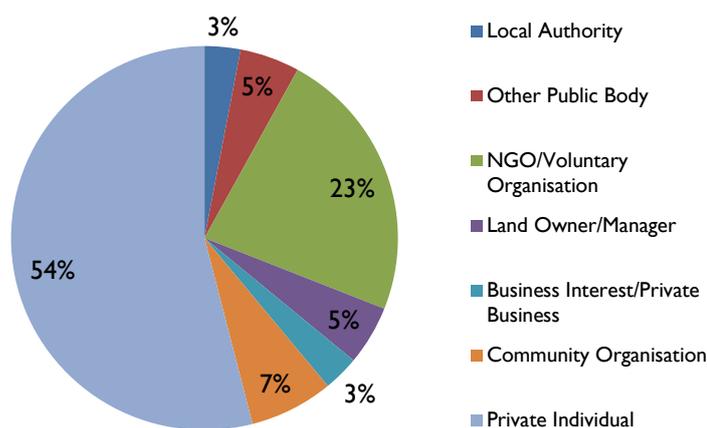
**Question 2: How can environmental volunteering opportunities be better co-ordinated and promoted to engage people?**

**Overview**

20% of respondents answered this question.

<b>Respondent type</b>	<b>No. of responses</b>
Local Authorities	<b>2</b>
Other public bodies	<b>3</b>
NGO's/ Voluntary Organisations	<b>15</b>
Land Owners / Managers	<b>3</b>
Business Interests / Private Businesses	<b>2</b>
Community Organisations	<b>5</b>
Private Individuals	<b>35</b>
<b>TOTAL</b>	<b>65</b>

**Response by stakeholder group**



**Key points raised:**

- Increasing awareness of volunteering opportunities – such as a central portal for opportunities within the National Park.
- Improved facilities to support volunteers including affordable accommodation
- Good volunteering co-ordination and partnership working including with Ranger Services.

**Discussion**

The majority of respondents to this question were individuals (54%).

*Engaging and encouraging volunteers*

Private individuals expressed the view that volunteering is more meaningful and successful where objectives are longer term and clearly communicated so individual volunteers can see the progression of their work. It was also highlighted that volunteering needs to be educational for volunteers to develop practical skills and experience or contribute to their Continuing Personal Development.

One individual expressed the view that environmental volunteering has declined due to factors including increased financial constraints on students, impracticality of accessing the countryside and welfare /Health and Safety impositions for organisations. Another highlighted that for volunteering to be successful, volunteers like a range in the type of volunteering as well as the length of time such one-off events and short term as well as longer term regular volunteering.

It was also suggested by one individual that there should be greater participation from local communities in contributing to visitors' experience. Another highlighted that the focus should not just be on environmental volunteering but farm volunteering too.

A number of respondents from across stakeholder groups highlighted that volunteering opportunities are not well advertised and people have to search to find them. Therefore it was suggested that a focused online portal or dedicated volunteering website could be developed to provide information about all opportunities in one place. It was also highlighted that opportunities could be promoted through social media. Advertising more widely was also suggested to promote 'volunteer holidays'.

A number of individuals and community organisations suggested working in collaboration to set up volunteering projects with education providers from primary through to university as well as other voluntary organisations (Scouts, JMT). In addition it was suggested working with partner organisations such as Trees for Life, the Woodland Trust and Scottish Nature to develop link with Schools across Scotland. It was felt that Schools should inform and encourage children to volunteer. The John Muir Trust highlighted the success of the Junior Ranger Project and John Muir Awards in supporting volunteering which is continuing in influence and engage young people as well as all other age groups.

It was also suggested that volunteering opportunities could be promoted through services such as for older people to engage a range of individuals. One stakeholder highlighted that volunteering needs to be accessible and affordable to encourage people to participate. The need for suitable and affordable accommodation (such as bothys and/or hostels) for volunteers was raised. Volunteers need somewhere they can stay, meet others and share skills. It also needs to be possible for volunteers to stay for different lengths of time.

Transport infrastructure was also identified as important to support volunteering – with a small population in the National Park, it needs to be accessible to people outwith the area.

#### *Volunteer co-ordination*

Many stakeholders highlighted that successful volunteering often relies on good co-ordination. To improve co-ordination and promotion some NGO's recommended signposting and utilising existing initiatives for such as Volunteer Scotland and relevant local groups such as COAT for walk-leaders, Active schools and Community Sports Hubs for sporting activities etc. Other individuals and business interests suggested establishing community volunteer co-ordinator roles to provide a focal point of volunteering

information and opportunities. Others suggested liaison between Ranger services, Catchment Management Partnerships and Biodiversity Partnerships. However NHS Highland and others felt that overall co-ordination would be best provided through CNPA.

Support was expressed by a number of stakeholders (including NGOs and Landowners) for the new CNPA Volunteer Co-ordinator to manage and promote volunteering opportunities more centrally. It was acknowledged by one Landowner that the post is only for 3 years and there is a need to make volunteering more self-sustaining and integrated with communities to ensure longevity.

SNH and other stakeholders highlighted the important of Ranger services in supporting strategic outcomes and providing and supporting volunteering opportunities. It is important that it continues to be financially supported.

#### *Other*

SNH highlighted it may be beneficial for all organisation who offer volunteering opportunities to share their experience, practice and policies. Further to this, one individual suggested that a small conference to discuss the opportunities and challenges of Volunteering with relevant bodies including FCS, NTS, RSPB, education providers.



## ISSUE 6: LEARNING AND INCLUSION

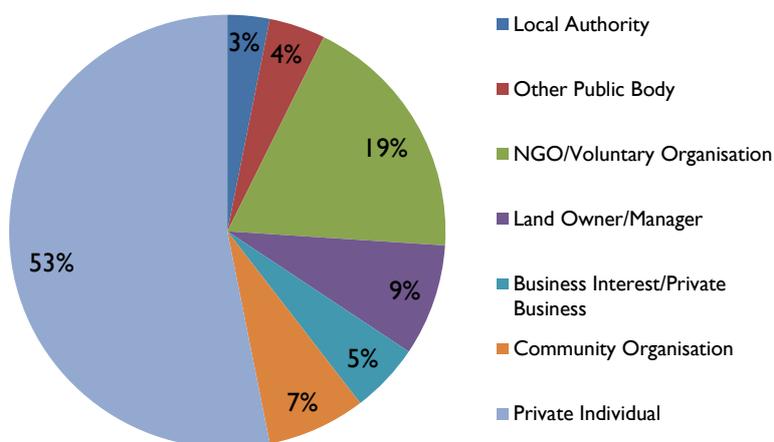
### Question 1: How can children across Scotland have the opportunity to visit and learn from being in the Cairngorms National Park?

#### Overview

30% of respondents answered this question.

Respondent type	No. of responses
Local Authorities	3
Other public bodies	4
NGO's/ Voluntary Organisations	18
Land Owners / Managers	8
Business Interests / Private Businesses	5
Community Organisations	7
Private Individuals	51
<b>TOTAL</b>	<b>96</b>

Response by stakeholder group



#### Key points raised:

- Incorporating it into the School curriculum which can also support the Curriculum of excellence.
- Overcoming barriers such as costs through the provision of more accommodation to suit different needs and budgets.
- Compiling resources for teachers and other education providers to learn about opportunities in the National Park and associated practicalities.

#### Discussion

The majority of respondents from all stakeholder groups generally agreed that all children should learn about the natural environment and supported the principle of outdoor based learning. However some individuals and other public bodies queried whether it would be more appropriate for schools and groups to focus on outdoor learning opportunities in green and wild spaces closer to home which may be more practical and affordable.

SNH in particular recommended expanding the target for every child to visit the Cairngorms National Park in their School life to 'Contribute to the RAFE aspiration for every child to experience regular outdoor learning and play close to home and to have visited some of Scotland's special places including National Parks, National Nature Reserves, Biosphere Reserves and World Heritage Sites'. It was felt this would engage a wider range of partners, draw on more places and reduce the length of journeys for children.

### *Learning Experience*

Respondents from across all stakeholder groups felt that one of the biggest opportunities for children to learn about the natural environment and the National Park is through integrating it into the School curriculum. A number of NGO organisations and public bodies identified the opportunity for this to tie in with/contribute to the Curriculum of Excellence. It was also highlighted that there should be opportunities for all ages from primary through to secondary. One individual suggested referring to the 'Learning for Sustainability' report.

Engaging and working more closely with education providers was suggested as important for encouraging outdoor learning and promoting the opportunities within the National Park.

It was also suggested that trips could be planned into or form part of the curriculum for specific subject areas e.g. Geography. It was also suggested by one public body that learning trips to the National Park could also involve skills development and / or practical volunteering.

Another felt that adventure should be included in the outdoor learning agenda, while others suggested opportunities for education on deer management as well as Gaelic language.

Strong support was expressed by a number of stakeholders – including individuals, other public bodies and NGOs for the John Muir Award which is an important mechanism for delivery and promoting outdoor learning.

Collaboration with education initiatives such as the Royal Education Trust, Inbewu Scotland and the Scottish Countryside Alliance and Countryside Learning Scotland Programme was suggested by a number of respondents including NGO's, Landowners and business interests. The Countryside Learning Scotland Programme was highlighted as an opportunity to provide guidance for secondary age pupils about rural employment and has a new discretionary payments scheme supporting vocational rural skills training. It was raised that school children should be better informed about employment opportunities in the countryside with opportunities for practical experience. Support was expressed for this to be part of the Curriculum for Excellence.

Continued support for Ranger Services was recommended by one NGO for inclusion as a mechanism for delivery. A number of stakeholders including NGOs and community organisations expressed strong support for Ranger services in facilitating outdoor learning. It

was felt that greater support is needed to assist and support groups visiting the National Park including those disabilities and special needs, and Rangers are an important part of this. One landowner highlighted the importance of rangers in supporting learning events and education programmes such as the John Muir Award and Junior Ranger programme. They also highlighted that Rangers have links with education groups such as the Outdoor Woodland Learning Group (OWL). One business expressed disappointment that CNPA funding has been removed to Highland Council.

### *Barriers*

A number of stakeholders highlighted possible barriers in bringing school children to visit the National Park including the cost of travel, time (depending on where the group is travelling from), availability and affordability of suitable accommodation and health and safety.

It is acknowledged by many that the costs to visit, stay in and learn about the National Park are beyond the means of many. A number of stakeholders highlighted the need to make it more affordable for people and children to visit which could include improved and more affordable public transport, accommodation or camping facilities and increased support for outdoor activity providers.

A number of respondents suggested providing free and subsidised transport for schools. The value of the National Parks Travel Grant Scheme was however recognised by a number of stakeholders who felt it should continue to be supported.

### *Facilities*

A number of individuals and NGO's highlighted that whilst the National Park currently has outdoor learning centres – such as Glenmore Lodge and Lagganlia - more outdoor education and residential facilities are needed. It was raised that a wider range of facilities to suit different budgets is required. One NGO identified there are few places to stay particularly in the east of the National Park, whilst one individual suggested redeveloping Derry Lodge for adults and school groups.

A number of respondents from NGOs and Landowners supported residential learning experiences for schools and suggested that rural businesses sites such as farms and estates could support the learning experience (and increase awareness of the 'working' side of the National Park). It was also suggested by one landowner that land based businesses could form a link with one school for example outwith the National Park to provide regular (e.g. annual) visits for them to learn about the Countryside. It was also suggested that financial support could be provided for landowners to provide this service and encourage others to do so.

It was also highlighted that there is little reference in the consultation to the role of Local Authority Outdoor Education Centres.

### *Opportunities and Information*

It was suggested that where it is not possible for children to visit the National Park or even undertake outdoor learning, rangers and other outdoor learning professionals could go to them. It was felt that they can still learn about the National Park from their classroom. One NGO suggested that online learning resources for teachers and pupils could be developed so children can 'virtually' learn about and visit the National Park if it is not possible for them to actually go. The Schools Intranet system GLOW could also be used for this.

One individual suggested increased promotion of the National Parks outdoor learning opportunities in all Schools is needed and it must be easy for them arrange. A number of respondents including NGO's and landowners suggested developing resources such as information packs or a 'quick guide' to curriculum experiences in National Park for teachers and educational professionals to learn about, plan and prepare for a visit to the National Park. Resources should be available online and can be used to promote the National Park as a destination for outdoor learning. It was also added that information about what is free and accessible needs to be easy to find.

### *Partnership Working*

Working in partnership with other public and private sector organisations to develop and provide CNPA accredited courses and experiences was suggested. The Local Authorities also highlighted that the Learning and Inclusion section of the Partnership Plan should include detail on partnership working along with the CBP who welcomed an opportunity to work in partnership to market outdoor learning opportunities through education, voluntary and third sector organisations.

### *Other*

Other suggestions for supporting outdoor learning in the National Park included commissioning Learning for Sustainability Scotland to review current opportunities and identify possible enhancements. VisitScotland also identified potential opportunities to tie in initiatives with 2018 The Year of Young People. HIE also recommended they are identified as a mechanism for delivery.



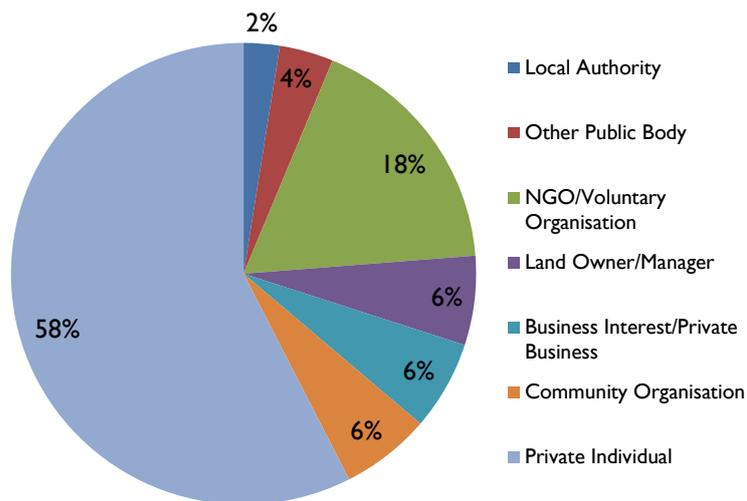
**Question 2: What else could be done to help under-represented groups visit and experience the National Park?**

**Overview**

25% of respondents answered this question.

Respondent type	No. of responses
Local Authorities	2
Other public bodies	3
NGO's/ Voluntary Organisations	14
Land Owners / Managers	5
Business Interests / Private Businesses	5
Community Organisations	5
Private Individuals	46
<b>TOTAL</b>	<b>80</b>

**Response by stakeholder group**



**Key points raised:**

- Utilise initiatives including the John Muir Award, and Community Leadership programme.
- Provide training and support to outdoor providers to support under-represented groups to access activities, working with relevant partners, charities and organisations.
- Increased provision of suitable and affordable accommodation that can make visiting the National Park more accessible.

**Discussion**

A high proportion of private individuals responded to this question (58%). Overall the majority of respondents agreed that encouraging under-represented groups to visit and experience the National Park was a positive.

*Engaging with under-represented groups*

Accessing and effectively engaging with under-represented groups was acknowledged by many stakeholders as being key to engaging them with the National Park. One individual

suggested utilising existing representatives from these groups for advising how to engage. Another identified properly resourced outreach work with local communities and groups including the elderly, low-income and migrant groups living in and around the National Park. One Local authority suggested increased involvement in Health and Social Care integration.

Some individuals and NGOs suggested working with partners, charities and organisations (including the Council of Ethnic Minority Voluntary Sector Organisations (CEMVO)) who support vulnerable and under-represented groups to create opportunities for more people to visit the Park. Commissioning the Scottish Council for Voluntary Organisations to review their membership organisations and explore potential of engaging with them was also suggested. It was suggested by another individual that material about the National Park could be produced and delivered through 'ambassadors' across Scotland. However one Local Authority highlighted the need to ensure there is a sufficient balance between supporting and encouraging the people living in the National Park and others who come to visit.

Others suggested specific encouragement, support and training for outdoor providers to support and enable older and disabled people to access activities (Inclusive Cairngorms and Equal Adventure for example). Another respondent identified youth groups as a potential opportunity to engage with under-represented groups. It was noted however that consideration of cultural differences is needed – the focus should not be on specific groups which could lead to generalisations.

#### *Initiatives*

It was suggested that initiatives such as the John Muir Award and Community Leadership Programme could help encourage under-represented groups to engage with and visit the National Park. The John Muir Trust highlighted that 25% of John Muir Awards recipients have been from disadvantaged backgrounds. Being a free to use and un-bureaucratic is part of the reason it works so well for under-represented groups.

VisitScotland also highlighted their #ScotSpirit campaign which helped under privileged families experience a holiday in Scotland. They suggested that CNPA could play a key role in future initiatives. They also added that there are other possible initiatives CNPA could be involved in.

Some public bodies and NGOs suggested building links with Black and Minority Ethnic (BME) groups to help build confidence of under-represented groups that they are welcome in the National Park through a clear message that discrimination is unacceptable. They also suggested that the Scottish Government should be approached about funding to support group visits for under-represented groups as part of the Natural Health Service.

Another individual suggested taster sessions for activities could be held to encourage people in and around the National Park to get more involved.

## *Barriers*

Understanding and identifying the barriers and challenges faced by under-represented groups was identified as being key in encouraging them to visit the National Park. A number of other public bodies and NGOs, including SNH, suggested referring to the report *Scotland's National Parks and National Nature Reserves -Overcoming barriers to engagement (2009)* which identifies and addresses barriers. The John Muir Trust highlighted some of these barriers including a lack of awareness, understanding, relevance, priority and time to visit the National Park. In addition practical barriers included cost, transport and equipment. One individual suggested fear of the countryside/nature, lack of public transport and perception.

Funding and financial constraints were identified by a number of respondents as a barrier for under-represented groups, highlighting that greater funding is required to support disadvantaged (including those with mental health problems) and under-represented groups to visit the National Park.

The need for appropriate and affordable accommodation was also highlighted by some NGOs, including affordable camping options. It was also suggested that the 'Cairngorms on Shoestring' idea should be reinvigorated/ brought back.

## *Facilities*

It was raised by one individual that there is no mention of the role of outdoor education centres in the National Park such as Glenmore Lodge in helping under-represented groups. Badaguish was also identified by one community organisation as important for supporting under-represented groups and working with facilities such as this should be encouraged. However many stakeholders felt there is a shortage of appropriate facilities and accommodation (including camping) to enable under-represented groups to visit and experience the National Park.

In addition the physical infrastructure for disabled and under-represented groups was identified as being inadequate. One Landowner highlighted that there is a perceived shortage of disabled facilities in the National Park. In addition, some NGO's highlighted the need for more accessible paths and car parking networks, whilst another identified the need for better (and easy to use) gates, hard accessible paths and improved availability of disabled toilets. Another identified that gender neutral accommodation and toilet facilities are required.

## *Opportunities*

The need for more cost effective, accessible and inter-connected public transport infrastructure was highlighted as being important for encouraging and enabling under-represented groups to visit the National Park. Discounted travel for these groups was

suggested as well as prioritising travel grants for particular areas/schools. Particular support was expressed for the CNPA travel grant.

Some stakeholders suggested that web based information on accessibility and assistance in the National Park should be developed and promoted as well as improving CNPA literature, marketing and promotional material are representative of the wider population. One community organisation suggested that there should be greater promotion of the National Park as a 'Park for all' and should be identified as a Target.

It was also added by one NGO that supporting the provision of accessible paths is important but also providing alternative natural experiences (sensory, touch, sound trails etc) which could be promoted amongst under-represented groups and organisations.

One Local Authority felt that an experienced Ranger service is key in supporting environmental education and underrepresented groups. Investment in this increased / reconsidered. Another Landowner highlighted that the Ranger services can work with partner organisations to provide opportunities for under-represented groups such as Earth for Life. They felt that there are further opportunities to deliver familiarisation days in the National Park which could be co-ordinated by CNPA.

It was suggested by one Landowner that there should be a central administration of interest matched to estates, farms and woodland who can host special interest groups. In addition, one private business highlighted the work that they are currently doing to support active nature play experiences for children in the National Park. They welcomed any support from CNPA to enable them to work with more excluded groups.

It was suggested lottery funding and sponsorship from other organisations and businesses should be explored to enable under-represented groups to visit the National Park.

#### *Others*

It was noted by a Local Authority that Equality Impact Assessments should be carried out on all policies to help identify actions required to further support and enable access to the National Park.





## RURAL DEVELOPMENT CHALLENGES

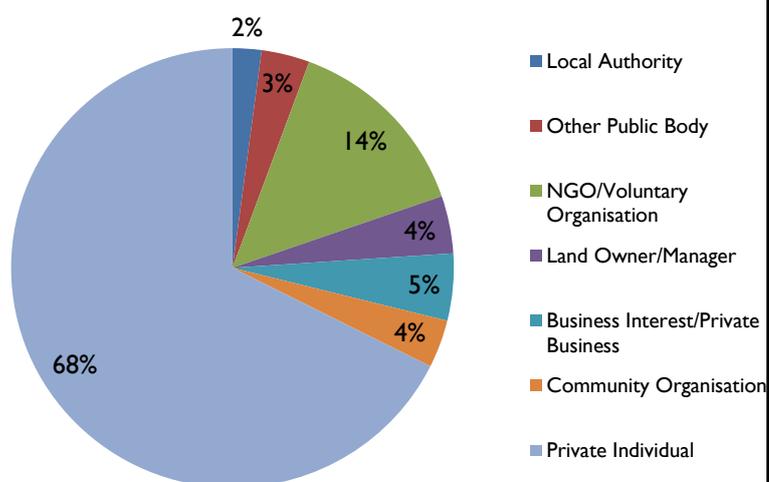
**Question: Do you agree these are the big rural development challenges we should be addressing through our next Partnership Plan?**

### Overview

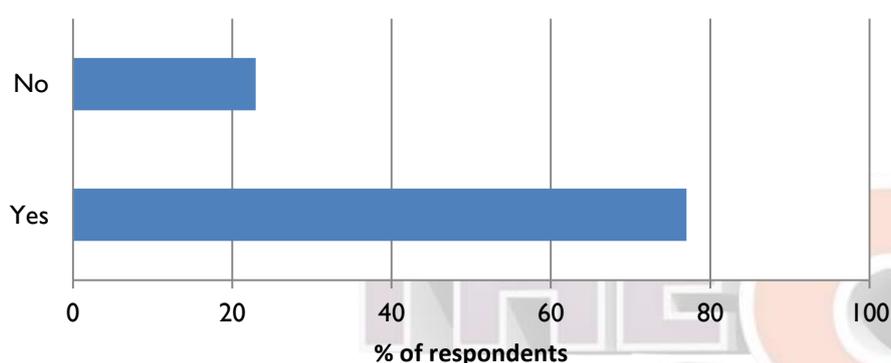
Just under half (44%) of all respondents answered this question. Responses were received from a range of stakeholder groups as show below.

Respondent Type	No. of responses
Local Authority	3
Other Public Body	5
NGO/Voluntary Organisation	20
Land Owner/Manager	6
Business Interest/Private Business	7
Community Organisation	5
Private Individual	96
<b>Total</b>	<b>142</b>

Response by stakeholder group



Do you agree these are the big rural development challenges?



### **Key points raised**

- Significant level of agreement with the big rural development challenges.
- Of those who disagreed, some feeling that development should not be a priority in a National Park.
- The need to put in place post-Bexit arrangement to replace funding sources for rural development projects (e.g. LEADER and SRDP) was identified as a priority by some.

### **Discussion**

There was substantial agreement with the rural development challenges outlined within the consultation document, with around 77% of respondents agreeing these are the right priorities for the NPPP.

Of those respondents that agreed with the rural development challenges, a number went on to stress the necessity of ensuring that development does not adversely impact on conservation objectives. However, others felt that meeting the development needs of communities should be prioritised over protection of the environment. Other respondents stressed that new developments must be of a size, density and design suitable for a National Park, and of the highest standards of sustainability. One respondent stated that development around town centres should be prioritised over green-field development, and that new development should conform to standards such as Designing Streets.

23% of respondents did not agree that the rural development challenges were appropriate. Of these, a number did not agree that development should be a priority for the National Park at all. They felt that wildlife protection should be the over-riding priority for the NPPP. One respondent questioned what the Economic Strategy of the National Park was, while another felt that the Economic Strategy is relevant to all outcomes and therefore questioned why it was only referenced in the Rural Development section of the consultation document. One respondent felt that the NPPP should include more support for retaining and expanding existing land related businesses such as farming, forestry and sporting activities. A number of respondents stated that too much focus was being placed on community-led development and that development should also meet the needs of businesses. One comment felt that community-led initiatives tend to falter when public sector start-up funding declines or initial enthusiasm wanes and therefore suggested that the NPPP should place more emphasis on public and private sector activity.

The need to put in place post-Brexit arrangement to replace existing funding sources for rural development projects (e.g. LEADER and SRDP) was identified as a priority by a number of respondents.

## ISSUE 7: HOUSING

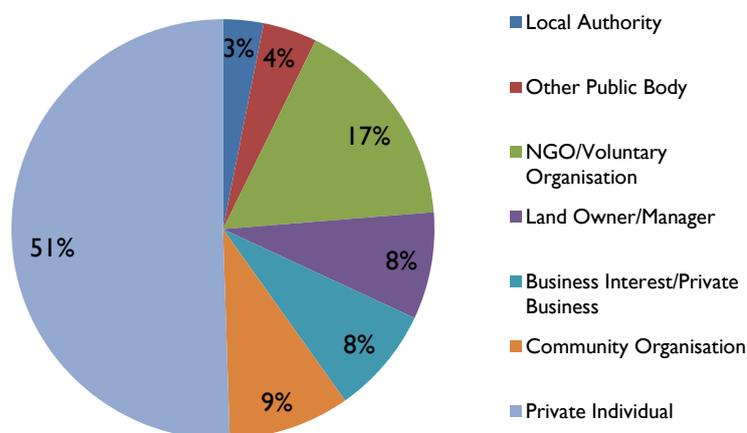
### Question 1: How can more housing that is affordable to people working in the National Park be delivered?

#### Overview

Just under a third (30%) of all respondents answered this question, with responses coming from a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	3
Other Public Bodies	4
NGOs/Voluntary Organisations	16
Land Owners/Managers	8
Business Interests/Private Businesses	8
Community Organisations	9
Private Individuals	49
<b>Total</b>	<b>97</b>

Response by stakeholder group



#### Key points raised

- There is an issue of affordability within the National Park and this is having negative social and economic effects.
- Current affordable housing policy could be made more effective, with solutions including greater levels of social housing development and the use of occupancy conditions of for sale dwellings.
- There were polarised views on how housing should be delivered, with some arguing for small sites and plots and others arguing for further land allocations.
- That the CNPA should lobby Scottish Government for legislative changes.

#### Discussion

The lack of affordable housing was raised by a large number and broad range of respondents, including private individuals, NGOs and businesses.

Business representatives, including the Cairngorms Business Partnership, raised concern that the lack of affordable housing was inhibiting economic growth and hence suppressing Economic Development and the achievement of the Cairngorms National Park Economic Strategy. This related to both house prices and rents.

There was concern that people of median and below median wages could not afford to live near their places of employment and that for many of these workers, social housing was not a solution, either due to its lack of availability or due to the fact that they did not qualify to occupy it. One example of a sector where the proximity of accommodation to work place was important was the tourism sector, which contributes significantly to the National Park's economy. It was argued that workers in this sector often worked 'unsocial' hours, split shifts and often for multiple employers and therefore a reasonable commute was essential. The loss of key workers such as teachers and nurses was also considered an issue.

The spatial nature of affordability was also recognised by some, who argued that there was an ongoing honeypot effect in places like Aviemore, Ballater and Blair Atholl.

There was some concern over the definition of 'for sale affordable housing', with suggestions for definitions, such as £70,000 for a 3 bedroom semi, proposed. There was a consensus that social housing delivered by housing associations was an important part of its provision. However, there was a view that there is a lack of social housing within the National Park and that more should be built. Furthermore, many felt that rules for social housing occupation were problematic in some areas, with some arguing that local people and people working in the area should be given priority.

Some respondents asked that the National Park Authority look to examples of affordable housing provision in other authorities, such as Highland and Eilean Siar. Other respondents suggested looking further afield, to the wooden and modular buildings of Scandanavia. However, others proposed their own suggestions, such as the increased provision of 'shared equity' housing, limiting the size of new dwellings, providing more flats, requiring new developments to deliver at least 50% of units as some form of affordable dwelling, requiring applicants to agree the selling price of land and who they will sell it to prior to issuing consent, prioritising affordable home delivery within developments, more estate housing and the use of occupancy conditions linked to income, locality and / or profession. The issue of the perpetuity of affordable housing was raised by a few respondents and it was argued that occupancy criteria would be a means of addressing this. There was also support for the CNPA's policy on affordable housing exception sites. One respondent was keen to point out that there should not be a 'one size fits all' policy for affordable housing.

One respondent argued that a reformation of the Park's economic system was required and that without better pay, local workers would not be able to compete with the wealth of incomers.

A further solution proposed, largely by landowners and those with an interest in housebuilding, was the maintenance of the current land supply coupled with provision of additional housing allocations. For example, several respondents argued that An Camas Mor would provide innovative methods of ownership and tenure and a public aspiration for 40% affordable housing. Conversely, some respondents used the consultation to raise objections to specific sites currently allocated in the LDP, including An Camas Mor, near Aviemore and

Site HI, in Ballater. It should be noted that the consultation on the NPPP is not an opportunity to propose or object to specific sites.

Some respondents questioned the current settlement Strategy. For example, one respondent argued that growth around Aviemore needed to be constrained and housing and other developments directed towards other communities. It was argued that this would strengthen economic viability in other communities, and help to improve transport links. Some respondents even questioned the need to deliver any new housing at all, with one calling for a population cap on the National Park, essentially enforced by not providing any further housing.

Levels of second home ownership were also linked with locally high property prices. Some asked for a reduction in the second home and self-catering holiday stock to increase the occupied housing stock. It was suggested that a tax on second homes and empty homes could help fund the delivery of affordable housing elsewhere.

Many private individuals, NGOs and community organisations thought that future housing developments should be on a small scale. Generally, it was argued that these should be located within or adjacent to existing small communities and housing groups. It was suggested by some that Local Authorities should provide serviced plots for this purpose. Some argued that planning regulations should be relaxed on these types of development, indeed the view of several respondents was that the planning system was currently too difficult to navigate for some and this was limiting development.

Many private individuals and community groups felt that there should be greater emphasis on local homes for local people and those who work within the National Park. It was argued that housing need should be defined at a more local level, not Park wide. Questions were asked about the evidence base and the need for further analysis, particularly around levels of local need and the impact that the dualling of the A9 would have on house prices.

Many felt that certain aspects of housing policy were not within the gift of the National Park Authority or its partners to deliver. The Scottish Government was seen as being key to implementing certain policy or legislative changes and it was argued that the NPPP should form the basis for lobbying for these changes. These included lobbying for the level of affordable housing within private developments to be greater than 25%, rent controls, banning second homes that are not made available to rent for at least 30 weeks a year, higher funding for housing associations, occupancy conditions on new dwellings and requirements that consents be delivered within a specific time scale.

Many considered that empty buildings should be bought back into use. Some argued that this should occur before any further sites were developed. The condition of existing stock was however considered an issue and housing deprivation, including fuel poverty, was highlighted as being extremely problematic for some. It was suggested that refurbished this housing to a good insulation standard would provide wider options for local people. Relating

to this, it was argued by many that new dwellings should be sustainably designed and built. Encouraging district heating was suggested by some.

There was some concern over the affect new housing development might have on the natural environment. To some no new housing was acceptable while others argued that the location and scale of housing needed to be considered carefully. One respondent argued that there was a current policy bias towards keeping landscapes unspoiled is driven by and benefits the middle class and that parts of the National Park may need to appear to be less 'unspoiled' in order for housing and economic needs to be met.

The design and layout of sites was considered to be important and that CNPA should demonstrate it is making a real difference by helping to safeguard and reinforce the special natural and built heritage qualities of the National Park and coming up with more innovate delivery mechanisms for addressing local housing needs.



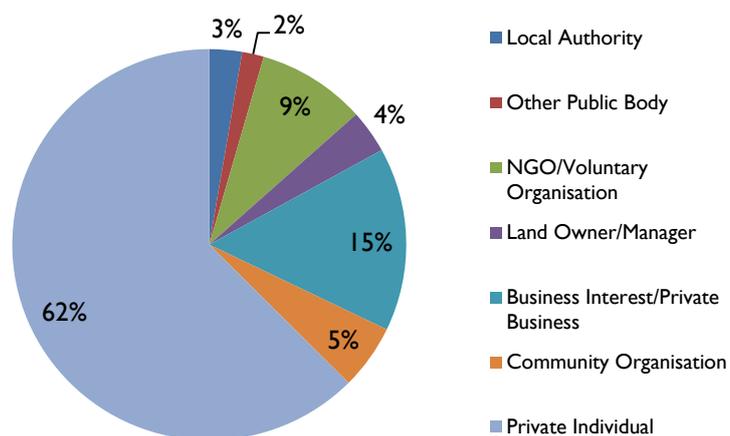
## **Question 2: How can the proportion of second home ownership in the National Park?**

### **Overview**

Just over a third (35%) of all respondents answered this question, with responses being submitted by a range of stakeholders.

<b>Respondent Type</b>	<b>No. of responses</b>
Local Authorities	3
Other Public Bodies	2
NGOs/Voluntary Organisations	10
Land Owners/Managers	5
Business Interests/Private Businesses	17
Community Organisations	6
Private Individuals	70
<b>Total</b>	<b>113</b>

**Response by stakeholder group**



### **Key points raised**

- Strongly polarised views between those who felt the proportion of second home ownership in the National Park was problematic and those who did not.
- Support expressed for more disincentives to second home ownership through various forms of taxation or occupancy clauses on new dwellings
- Objection to reducing the proportion of second homes owing to concerns on the economy and local businesses.

### **Discussion**

The responses to this issue were highly polarised, with some arguing for tighter controls on second home ownership and others arguing against the aim to reduce the proportion of second homes. There was also a clear distinction between the types of respondents, with community groups, NGOs and private individuals tending to argue the former and business interests tending to argue for the latter. It should be noted however that there was a great level of diversity within these groups relating to what were considered appropriate responses or interventions.

It was argued that the statement that there was 'high' proportion of second homes is subjective. Some argued that second home owners contributed to the National Park's economy and that attempting to reduce their proportion would have a negative effect on

the economy and local businesses. It was argued that second homes were an important part of the mix of housing and of the local economy; providing those who finance infrastructure with a higher degree of confidence. It was also suggested that many second home owners discover how they can operate a business within the National Park and if they do not, many of their children often do too.

A substantial proportion of responses were from builders and other tradespersons working in the construction industry. These largely followed the same template and argued that a substantial percentage of their work came from second or holiday homes and that a reduction in the proportion of these would negatively affect their business.

The spatial dimension of second home ownership with the National Park was recognised, with some arguing that policies to reduce the proportion of second homes should be focused on specific problem areas, because in many areas of the National Park, it was not a problem.

There was also the view that the issue of second home ownership was not a matter for the CNPA to address but one for the Scottish Government or Local Government through land and building transaction tax, tax treatment of income and application of double council tax. It was recognised that these are relatively new measures and therefore it would be beneficial to allow these to 'bed-in' before applying further disincentives.

Some argued that restrictive measures were unnecessary and simply increasing the land supply and providing more new housing would counter any negative effects, regardless of what the proportion of second homes was or will be in the future. If the proportion of affordable housing was high, then there would be a good supply of dwellings not available to second home purchasers. Another 'spatial planning' solution was to make it easier to subdivide large dwellings to provide smaller, flatted accommodation.

Many on both sides of the argument saw merit in Local Authorities using their powers to raise council tax on second homes and using the revenue from this to fund the provision of affordable housing. There was some doubt however that this would have broader effects in terms of reducing the demand for second homes. Concern was raised over the number of residences registered as holiday homes, but primarily used as second homes, and thus avoided any taxation through small business rates release; it was suggested that these should be identified and taxed as second homes.

Other forms of taxation were also suggested as disincentives to second home ownership, including a tourist tax and an increase in the sale tax on second homes.

Occupancy conditions on new dwellings was suggested by a number of respondents, but the nature of these conditions varied. Some argued that conditions should stipulate a minimum occupation period for dwellings (e.g. 50% of the year). Others argued that all new build homes should be owned by the local community / long term community residents and that these should be the owner's primary residence or place of work, for example one

respondent suggested that new housing should only be sold to people who had lived in the National Park for a period of 5 years.

Some respondents suggested direct interventions around existing second homes, including using compulsory purchase orders and taking advantage of the provisions of the Land Reform Act.

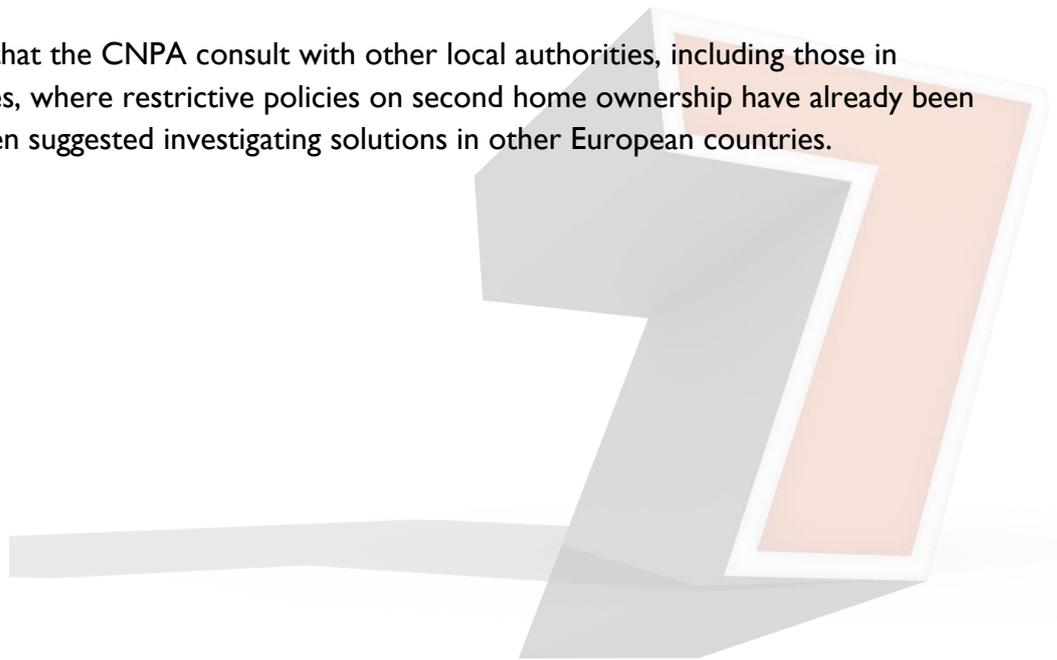
Several respondents argued for controlling the proportion of second homes through design. For example, one suggested that second homes tended to be larger and had views in comparison with first rung of the ladder homes, so the solution, they argued, was to build a lower proportion of large houses on 'estate' type developments. Others disagreed with this assertion, arguing conversely that building small houses and flats were attractive propositions for many prospective second and holiday home owners.

Some offered caution however, arguing that second homes that were used as holiday lets should not be discouraged as it was important that the National Park offered a good range of accommodation for visitors.

It was also suggested that housing churn, resale and profiteering could be reduced if new homes were large enough to be flexible and adapted over time i.e. they could be increased in size depending on occupational need; sub-divided for future single person income / rental, or converted for home-office requirements.

It was suggested that more data on the number of empty homes within the National Park would be useful as tackling these would help to boost housing provision and would, in most cases only have a positive impact on the area. It was recognised however that there were some properties which were not worth bringing back into use. For example very remote houses which have been empty for a significant period of time, have poor access and few utilities.

It was suggested that the CNPA consult with other local authorities, including those in England and Wales, where restrictive policies on second home ownership have already been applied. Some even suggested investigating solutions in other European countries.



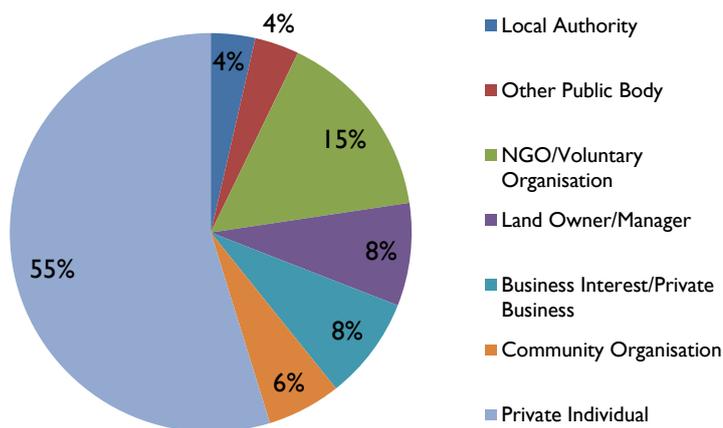
**Question 3: How can best use be made of the existing land supply (e.g. what types of housing should be prioritised)?**

**Overview**

Just over a quarter (26%) of all respondents answered this question, with responses being submitted by a range of stakeholders.

Respondent Type	No. of responses
Local Authorities	3
Other Public Bodies	3
NGOs/Voluntary Organisations	13
Land Owners/Managers	7
Business Interests/Private Businesses	7
Community Organisations	5
Private Individuals	46
<b>Total</b>	<b>84</b>

**Response by stakeholder group**



**Key points raised**

- Most respondents recognised the role of the planning authority and the planning system in allocating and delivering land.
- The importance of maximising affordable housing provision was raised.
- Need for a robust evidence base to inform policy and allocations.

**Discussion**

There were no strong collective opinions arising from this question. Most respondents recognised the role of the planning authority and the planning system in allocating and delivering land.

Several respondents were keen highlight the importance building good quality, affordable, sustainable and eco-friendly housing, with Ardgeal, near Kincaig offered as a good example. A range of tenures were suggested including rental and owner-occupier. It was argued that the focus should be on the development of ‘communities’ where people are encouraged to live and learn. Some respondents argued that this development should be small scale and community driven. It was argued that all new housing should be accessible to people who live and work in the National Park.

That sites should deliver the maximum amount of affordable housing was also argued for. In some instances, land should deliver 100% affordable housing. It was also argued that the

CNPA should follow the example of the Lake District National Park and not permit any open market housing within the National Park. Once again, the point was raised that local people and local workers should get priority over this housing. Others however claimed that this could hinder the delivery of certain projects, especially in relation to converting / refurbishing older buildings, where site overheads were very high or where there was no demonstrable need for affordable housing.

Some argued that sites needed to provide a range of housing, not just affordable housing. It was also noted that changes in the age profile of the National Park would lead to specific needs arising, such as more accessible and sheltered housing. Another suggestion was that where a business wanted to employ more staff then they would need to contribute to the cost of providing new housing.

There was some concern about new dwellings becoming second homes. Solutions included building affordable housing that was not available to prospective second home owners and creating opportunities for hutting, which would theoretically relieve pressure on housing stock.

The nature of housing need was raised with some respondents questioning NRS' population and household projections, doubts about the relatively low levels of growth projected. It was suggested that local area surveys should be carried out to ascertain need for the various communities within the National Park. Others however, drew on the projections to argue that they indicated that due to falling average household sizes, future housing should be smaller in scale, with a presumption against residences with more than two or three bedrooms. Others highlighted the importance of the HNDAs in deterring housing need and housing strategies in delivering the right sort.

There was a perception that many of the allocated sites in the National Park were being landbanked. Solutions to this included taking advantage of the provisions of the Land Reform Act, changing primary legislation to shorten the time planning consents were live and encouraging the development of smaller sites and single plots. In relation to small developments, it was suggested that public money could be used to provide services and infrastructure. Others were not convinced that helping communities make the most of the right to buy land in order to secure local housing solution was feasible given the financial requirements involved in securing and delivering development.

Some respondents did not believe that land was truly limited and where it was it was mainly due to infrastructure and planning restrictions. In response, it was suggested that a phased approach to infrastructure could be allowed. Others argued that there was sufficient land within proximity to the existing communities.

Some highlighted the importance of the forthcoming LDP's settlement strategy and that sites should be targeted in the most appropriate and sustainable way, to encourage public transport or walking/cycling, avoiding flood-prone settings, working with the natural

environment to maintain greenspace and provide corridors through expanding urban developments. Aviemore was raised as an example of such an appropriate location.

Some respondents were keen to see incentives for developing empty properties, both residential and non-residential. It was stated that while these developments cost more than new build they had a much lower impact on the environment and would help to preserve the National Park's built heritage. It was also argued that larger underused dwellings could be subdivided into smaller units.

One respondent was concerned that while many people were supportive of new housing there were others who had moved to the area for its peace and space who were opposed to development. This, they argued, raises the issue of divisions within a community and how the views of the whole community can be considered rather than vocal minorities.

Several respondents highlighted the special landscape and ecological qualities of the National Park and that the choice of sites and nature of development should not negatively effect these. One respondent argued that the CNPA has an opportunity to co-ordinate the delivery of mitigation to protect the capercaillie from increased harm as a result of new residential development. They suggested that the example of strategic mitigation in relation to the Thames Basin Heaths (TBH) Special Protection Area in South East England should be followed as a model for similar strategic mitigation in the Cairngorms National Park. They also suggested that the CNPA explore the possibility of introducing a broader 'green infrastructure' levy on new developments to fund the management and enhancement of habitats within the National Park.

One respondent argued that too much emphasis was being placed on housing in the NPPP. It was argued that past approaches to delivery were ineffective and had had an adverse effect on the environment.

Some respondents used the consultation to object to sites in the current LDP including An Camas Mor near Aviemore and Site HI in Ballater. Others used it as an opportunity to support sites, such as An Camas Mor. It should be noted that the consultation on the NPPP does not provide the opportunity to offer support or object to specific sites.

Some argued that there should be a moratorium on house building until other ways to improve occupancy and bring down rental prices have been tried. Others simply argued that there should be no more housing.

Broader comments were also made about the use of land. One respondent argued that there was a great need for short lease small office accommodation to encourage many of the micro businesses operating out of 'front rooms' in the National Park to grow and expand. Many businesses, they said, face the same challenge, when looking to expand, finding the right affordable premises in which to expand.

## ISSUE 8: COMMUNITY CAPACITY AND EMPOWERMENT

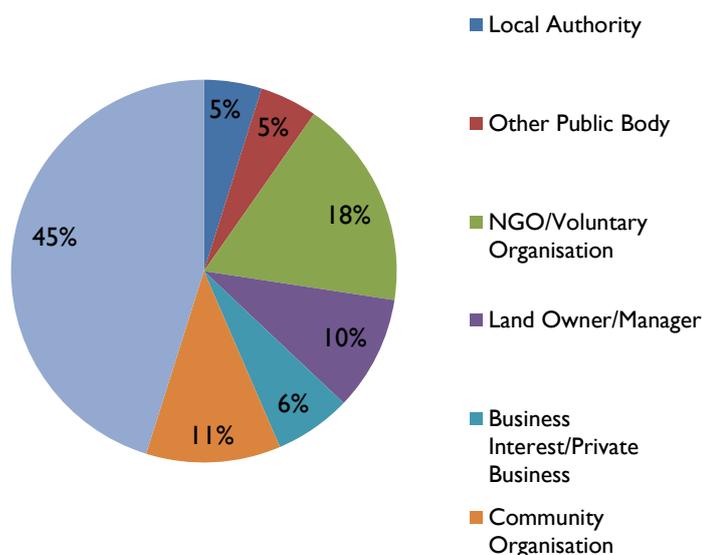
### Question 1: Are there sufficient support structures available to help build capacity and encourage empowerment, particularly in the most fragile communities?

#### Overview

19% of all stakeholders responded to this question.

Respondent type	No. of responses
Local Authorities	3
Other public bodies	3
NGO's/ Voluntary Organisations	11
Land Owners / Managers	6
Business Interests / Private Businesses	4
Community Organisations	7
Private Individuals	28
<b>TOTAL</b>	<b>62</b>

Response by stakeholder group



#### Key points raised:

- Greater financial and professional support is needed to build capacity and support development of community projects.
- Strong support for maintaining and expanding use of community development officers and organisations.

#### Discussion

Private individuals formed the largest proportion of respondents to this question (45%) however responses from across all stakeholder groups were varied. A number of respondents agreed that there are sufficient support structures in place while some did not, however in many cases, similar issues were raised for both.

Community organisations and private individuals raised a number of similar issues in response to this question. Respondents in this group largely felt that there are a number of

ways to further support communities and encourage empowerment. Some respondents felt that a major issue is the capacity of communities (available time, energy, local knowledge, consistent agreement and effort) to make things happen and the difficulties they encounter in respect of understanding funding, bureaucracy and interacting with authorities and stakeholders. One respondent queried what defines a fragile community while it was also raised that there are also specific interest communities as well as a national community of interest that are also important and should be supported.

Views were expressed that improved financial and professional support is needed, particularly to help build communities' capacity to set up projects including income generating assets. It was also suggested that Rural Appraisal techniques could be used to help identify what local people most value in terms of support mechanisms to enhance engagement.

Community volunteering was also raised as an issue whereby in some communities the same people end up volunteering repeatedly. Some respondents therefore felt that the need to support (one respondent suggested expenses for example) and engage with the right volunteers should be mentioned as a Target / Preferred Direction in the NPPP.

A number of other public bodies and NGOs acknowledge that the Cairngorms National Park has good examples of strong community capacity. However, it was queried whether this is equally distributed across the National Park. Some raised the issue that many communities may not have the necessary skills and time to progress projects and initiatives and therefore support is very important. One respondent from this group expressed particular support for income generating assets for communities which could be supported by the Scottish Land Fund. One respondent identified the important role of LEADER funding in building community capacity with another raising concern over the future uncertainty of these funds and the impact this may have.

Respondents from these groups suggested there could be more engagement with communities of interest such as hillwalking groups or Gaelic community initiatives.

The local authorities highlighted the valuable role of community development organisations – in the case of the Cairngorms National Park the Marr Area Partnership and Voluntary Action Badenoch and Strathspey – which they feel should continue to be funded and identified as mechanisms for delivery. It was further raised by one Local Authority that there is a need to engage a broader range of community members in the planning of support mechanisms alongside support services from a range of agencies and organisations involved in the sector.

The landowners/managers and business groups provided more varied responses to this question, with some feeling that there are sufficient support structures for communities already in place. Reference was made to Tomintoul and Glenlivet where a lot of work has been done, and it was suggested that there are opportunities for estates to act as delivery partners in community capacity building and could be identified as a mechanism for delivery.

However, a couple of respondents raised the issue of what happens once public funding ends and felt that safeguards need to be in place to ensure community projects are self-sustaining for the future and before funding stops.

One respondent did raise concern in respect of enabling communities to take control over income generating assets which could be taken to threaten income generating assets by private parties as private investment is very important in supporting rural development. Another mirrored this view with the thought that whilst there is a need to support community empowerment and sustainability, it must be ensured that public sector funds are not used to displace existing economic activity within the National Park.

It was also suggested that enterprise agencies, such as Highlands and Islands Enterprise should be identified as a mechanism for delivery.

Respondents from across all stakeholder groups highlighted that broadband could play a key role in supporting community capacity. In addition, respondents from other public bodies, local authorities, community organisations and private individuals expressed strong support for maintaining and expanding the existing support from Community Development Officers and community development organisations.

In addition, a meeting was held with the Association of Cairngorms Communities to discuss the consultation. As well as raising a number of the issues already highlighted, they emphasised the need for continued support to help communities update their Community Action Plans and take forward projects. It was also raised that communities should look beyond community councils and associations for support and input from a wider range of people. There were mixed views in respect of identifying a new spatial priority area with some in support but concern expressed over its impact on funding and support in other areas.



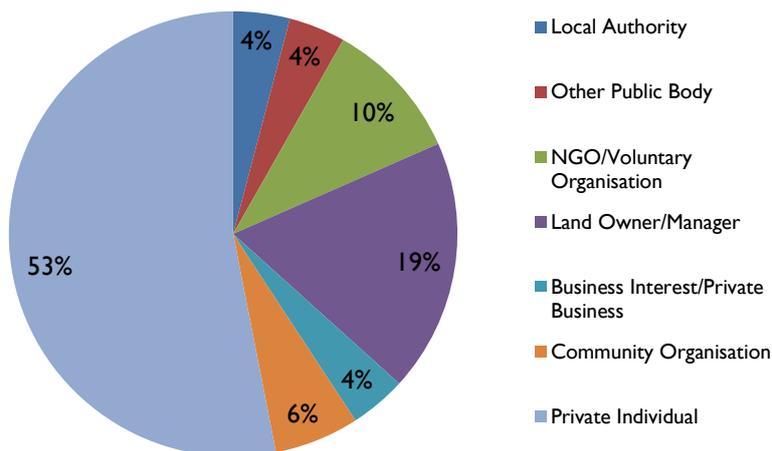
**Question 2: How should communities be supported to maximise opportunities provided by the Community Empowerment Act and Land Reform Act?**

**Overview**

15% of all respondents answered this question.

Respondent type	No. of responses
Local Authorities	2
Other public bodies	2
NGO's/ Voluntary Organisations	5
Land Owners / Managers	9
Business Interests / Private Businesses	2
Community Organisations	3
Private Individuals	26
<b>TOTAL</b>	<b>49</b>

**Response by stakeholder group**



**Key points raised:**

- Increased support to participate in terms of training, information, funding and encouragement
- There is a need to maximise participation across whole communities to avoid inequalities.
- A number of respondents highlighted the need for discussion and communication between communities and landowners before pursuing this route.

**Discussion**

Over half of respondents to this question (53%) were private individuals. This group along with community organisations made a number of suggestions about how communities can be supported to maximise opportunities provided by the Community Empowerment Act and Land Reform Act. These included providing information through community councils and community organisations, knowledge sharing, local area workshops and awareness raising events as well as producing information that can be understood by everyone. Community organisations identified the need for training and it was suggested that a specialist team could be set up to provide education and advice in this area.

Some respondents expressed concern about how the powers should be used with one suggesting greater support for mediation and arbitration with existing private landowners to resolve issues. It was also suggested that there should be incentives for communities with genuine conservation interests. One respondent felt that good and responsible land management is needed and there is no guarantee that transferring it to the community will do that. They added that land management skills, training and experience are needed.

Local authorities, other public bodies and NGOs identified that the Community Empowerment Act provides both opportunities and challenges for community involvement.

Local authorities in particular mirrored the view that communities will require support to participate in terms of training, information, funding and encouragement but added that a clear strategy to do this should be developed by partners named in the Act, including CNPA. It was suggested by a number of local authority and other public organisation respondents that spatial data on public assets and land ownership could be compiled and shared to help communities understand patterns of ownership.

It was also raised by these respondent groups that there needs to be attention on maximising participation across whole communities to avoid increasing inequalities. One respondent expanded on this point with the view that communities need to be fully involved in assessing their needs and agreeing outcomes appropriate to their locality. It was suggested that all available channels of information and involvement should be used to engage with members of the community regularly in different local facilities. Engaging with agencies on equal terms was also suggested.

Suggestions from other public bodies and NGOs also included considering how an ecosystem approach could help provide a framework for involving communities in expressing their values in respect of the natural environment, encouraging communities to work with service providers to influence delivery, and supporting the potential for a collaborative approach to Community Planning Partnerships.

Greater concern was raised by land owners and managers as well as business interests in respect of this issue. It was felt by one that CNPA should not be seeking to maximise opportunities under the Community Empowerment Act and Land Reform Act but optimise opportunities only where they align with the statutory aims of the National Park.

Most respondents felt that estates and landowners should be open to conversations with communities without the need to use the Community Empowerment and Land Reform Acts. They largely felt that early and open discussions between landowners and communities are best practice to see if a solution can be reached. One respondent explained that they already work closely with the community who will approach the estate directly to discuss particular issues. It was also raised that many land and estate owners already provide free facilities to communities which is not fully recognised.

Others raised concern about the economic sustainability of community run projects. A number of respondents highlighted that estates and landowners often have financial challenges or run at an economic loss and there needs to be greater understanding by communities of the responsibilities, including running and capital costs of owning and managing an asset. One respondent felt that CNPA should ensure Community Councils understand how the Acts can be used to deal with barriers to action where landownership is causing an issue.

The continuing need for the support of community development partnerships was expressed across a number of stakeholder groups.

#### *AoCC Meeting*

Whilst there was limited discussion about the Community Empowerment and Land Reform Acts, many of the comments raised at the AoCC meeting were applicable. They reflected the need for appropriate support to help communities understand what the legislation means and how projects communities can be taken projects forward.



## ISSUE 9: ECONOMIC DEVELOPMENT

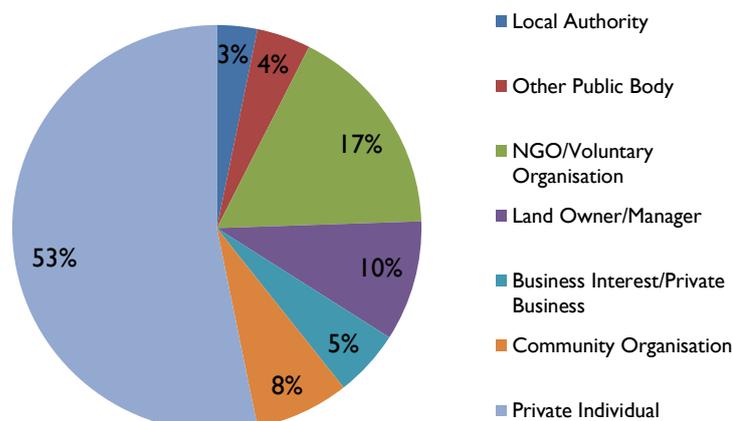
### Question 1: How can the National Park tourism sector be strengthened?

#### Overview

Just over a quarter (29%) of respondents answered this question.

Respondent type	No. of responses
Local Authorities	3
Other public bodies	4
NGO's/ Voluntary Organisations	16
Land Owners / Managers	9
Business Interests / Private Businesses	5
Community Organisations	7
Private Individuals	50
<b>TOTAL</b>	<b>94</b>

Response by stakeholder group



#### Key Points raised:

- Strong support for strengthening the wildlife offering within the National Park and developing eco-tourism.
- The quality and standard of facilities, customer service and information needs to be improved.
- Digital connectivity and accessibility (particularly public transport) should be prioritised.
- Landowners highlight that greater recognition is needed to the contribution of country sports in supporting a year round economy.

#### Discussion

##### *The Natural Environment*

Over half of the respondents who answered this question were private individuals (53%). The importance of the natural environment was highlighted by the majority of this stakeholder groups as being an important attraction for visitors. It was expressed that

tourism should only be strengthened where it will not have an adverse impact on the environment. Concern was raised by a number of respondents about issues relating to raptor persecution which could have a negative impact on tourism. Many of these respondents felt that wildlife crime was an issue and there needs to be greater focus on helping to support and increase the diversity and numbers of wildlife species (it was queried how many visitors actually get to see the species that the National Park is known for), to attract more visitors and particularly wildlife watchers. It was felt that greater emphasis should be on promoting wildlife and making it more accessible to visitors through species protection, habitat restoration and reintroduction of key species such as Lynx, Beaver and European Brown Bear. Another suggestion by an NGO to improve the nature offering was the creation of a flagship restoration programme of natural treeline succession which would be unique in the UK and has the potential to attract visitors.

Across most stakeholder groups there were a number of suggestions that the National Park could promote itself for eco-tourism as well as strengthening the brand as a 'wilder, nature based experience' and 'great adventure' destination.

A number of respondents highlighted the continuing need to support and develop activity based tourism including walking and cycling by promoting joint use of routes including the National Cycle Network and path networks. One NGO was of the view that there needs to be greater emphasis on visitor (not tourist) infrastructure which is land scape and wild life oriented and not necessarily on being physical active (accessible tourism).

The majority of landowners and some NGOs were of the view that country sports – shooting, stalking and fishing – should be utilised, promoted and expanded as an important part of tourism offer in the Park. A number felt the contribution of sporting tourism to the rural economy had not been fully recognised through the consultation documents. Visitors who come to the area for country sports bring substantial benefits to local businesses including local accommodation providers, catering, retail, game dealers as well as other land based businesses such as local fencing contractors. The season also extends through to February which supports a more year round visitor economy. It was felt more could be done in collaboration to maximise the experience of sporting visitors so they can enjoy other attractions in the National Park. Opportunities could include wildlife and photography tours which could be promoted by the National Park. This group of stakeholders also highlighted business potential to market the game of the Park as high quality organic food product.

This stakeholder group also felt that fiscal and planning incentives would encourage businesses to develop within the National Park.

#### *Facilities and Services*

Others felt that there should be more facilities beyond winter sports while another suggested the development of specific tourism sectors such as health/spa tourism. Stakeholders across a number of groups felt that there is a need to improve the quality and

standard of facilities, services and information within the National Park. Quality of place should be prioritised, particularly in key towns such as Aviemore and Ballater. A couple of respondents felt that instead of focusing on increasing the numbers of visitors, there should be focus on improving the quality of offering and increasing average tourist spend.

The need to maintain and enhance the quality and variety of visitor accommodation was raised by individuals, other public bodies and NGOs. It was raised by one that campsites are all organised, formal and expensive which leads to anti-social wild camping. Others suggested introducing wild camp facilities and infrastructure as well as creating of a 'cabin sector' such as in Norway.

It was commented that the tourism sector should be professionalised and skills development in this area should be supported to improve the profile of the sector as a career choice. This could help to improve visitor welcome, treatment and quality of experience.

### *Connectivity*

A number of respondents across all stakeholder groups identified phone signal and broadband coverage/availability as a problem that needs to be addressed to strengthen visitor experience and the wider tourism sector. Linked with this, it was suggested that a consolidated online experience could enable people to easily book accommodation and activities online and encourage visitors to come to the National Park.

### *Promotion*

Partnership working was identified by a number of other public bodies and NGOs as an opportunity to strengthen tourism. It was raised that CNPA should continue to work with strategic partners such the Cairngorms Business Partnership and working with VisitScotland to identify shared priorities and share information that can help identify what visitors are looking for. Another respondent identified the need for a more co-ordinated National Park Tourism collaborative effort which includes tourism promotion and advisory services.

A number of other public bodies and NGOs felt that better advertising both outwith (more globally) and within Scotland itself will help strengthen the tourism sector. This should be done through the promotion of the historical, cultural – including specific reference to Ballater Station - and natural attractions. There was also support for promoting the National Park and surrounding areas to their mutual benefit.

### *Transport*

Transport and accessibility was raised by a number of respondents who felt that improved public transport is critical to strengthening tourism along with the continued development of cycling and active travel infrastructure. The Local Authorities' identified investment and improvement of infrastructure as being vital in supporting economic growth and tourism. Specific reference was made to the A95 corridor which is the most important freight route

for the whisky industry. A route study was undertaken by the Moray Economic Partnership which identified the road is not in full accordance with the Design Manual for Roads and Bridges.



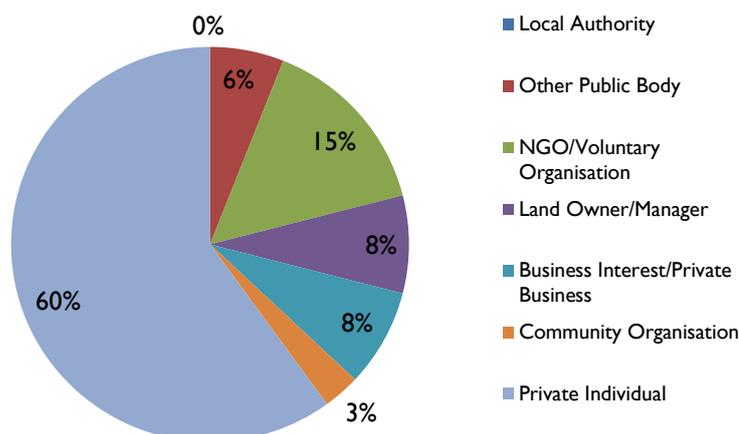
**Question 2: How can businesses be better connected with the natural environment for economic benefit?**

**Overview**

One fifth of respondents (21%) responded to this question.

<b>Respondent type</b>	<b>No. of responses</b>
Local Authorities	<b>1</b>
Other public bodies	<b>4</b>
NGO's/ Voluntary Organisations	<b>10</b>
Land Owners / Managers	<b>6</b>
Business Interests / Private Businesses	<b>5</b>
Community Organisations	<b>2</b>
Private Individuals	<b>40</b>
<b>TOTAL</b>	<b>68</b>

**Response by stakeholder group**



**Key points raised:**

- Increase businesses understanding of the value of the environment.
- Identify opportunities to develop eco-tourism, wildlife tours and forestry (and associated district heating) sectors.
- Continue support for opportunities to develop outdoor recreation as an attraction.

**Discussion**

Many respondents from across all stakeholder groups acknowledged the existing importance of the natural environment to businesses within the National Park and many identified that their businesses are already connected and dependent on this.

*Raising awareness*

Some NGOs and Business Interest respondents felt there is an opportunity to support and encourage businesses to tap directly into the economic benefit of being within the National Park. It was raised that a number of enterprises are already doing this well such as the Cairngorm brewery. One felt that more needs to be done to help businesses understand why the National Park Brand is important and can benefit their business.

A number of respondents suggested educating, investing in capacity building and running courses for businesses and their staff about the value of the environment and encouraging them to be more actively involved in conservation would improve their environmental practice.

Private individuals expressed the views that partnerships should be built to support businesses which restore natural capital and that all businesses should set a good example and have long term environmental sustainability objectives which can be monitored. Another suggested imposing higher environmental standards through planning.

### *Business opportunities*

This group were of the view that opportunities exist to develop business in eco-tourism, wildlife tours and eco-sensitive forestry. One added that businesses could work together for example accommodation providers linking up with tour providers for mutual benefit.

It was also highlighted by SEPA that district heating also provides a considerable opportunity within the National Park which would support the National Park Economic Strategy' priorities for forestry and is a renewable source of energy. Renewable energy more widely was identified as an opportunity to develop business in a more environmentally sustainable way.

The importance of supporting outdoor recreation (including walking, cycling, riding, canoeing) to the economy was highlighted by a number of respondents. One suggested developing the Cairngorms and Aberdeenshire as a new destination for mountain bike tourism by gaining support from businesses and improving the areas national and international profile. Another suggested monitoring routes such as the Speyside and Deeside Ways to identify opportunities to encourage business and improve visitor experience. The A9 was also highlighted as an opportunity to improve active travel linkages which will benefit businesses.

It was suggested by both some NGO's and landowners that the focus for further economic activity should be sporting, farming and forestry. It was felt that these businesses should be rewarded for the natural capital they protect and enhance. Encouraging farms to become LEAF accredited or take part in agri-environmental schemes can not only reduce costs but improve income for the business.

A number of respondents also felt there is a real opportunity to strengthen and promote the National Parks food and drink sector. Using the CNP brand on products of a particular standard or developing a National Park brand for food and drink could expand existing initiatives. Further support is needed to help link farmers to local markets and enhance their capacity to market their produce.

Concern was raised that country sports have a negative impact on the environment and wildlife. One respondent was of the view that subsidies could be used to help businesses

diversify from intensive land management and field sports. It was also raised that land is part of a circular economy and should not be used solely for profit. There is a need to work towards a land management culture that appreciates habitats and wildlife. RSPB suggested that a target could be to have a local population equipped with the skills to participate in land management functions which could be supported apprenticeships hosted by land owning government agencies.

#### *Mechanisms for reducing environmental impact*

SEPA highlighted the Regulatory Reform (Scotland) Act 2014 as a mechanism for connecting businesses with the environment. Reference was made to their Regulatory Strategy which ensures regulated businesses are reducing their impact on the environment by reducing carbon, material use, water and waste. It was suggested that the Regulatory Strategy – One Planet Prosperity – should be identified as a mechanism for delivery. SNH also referred to the Natural Capital Protocol (2016) which aims to support better business decisions by considering how people interact with nature.

#### *Others*

Other public bodies felt that economic development must have very high regard to conserving the natural environment. Improving broadband was suggested to support diversification of the economy, provide alternative employment opportunities and provide a means of informing visitors about the natural environment they are in.



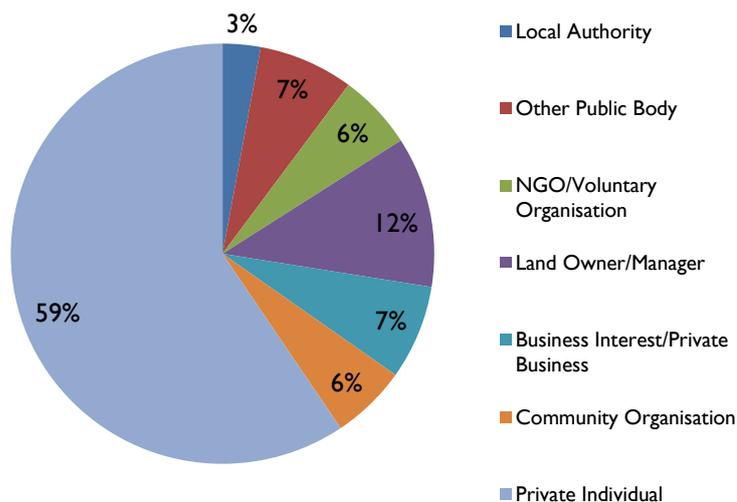
### **Question 3: What more can be done to diversify the National Park's economy beyond tourism?**

#### **Overview**

One fifth of respondents (22%) responded to this question

<b>Respondent type</b>	<b>No. of responses</b>
Local Authorities	<b>2</b>
Other public bodies	<b>5</b>
NGO's/ Voluntary Organisations	<b>4</b>
Land Owners / Managers	<b>8</b>
Business Interests / Private Businesses	<b>5</b>
Community Organisations	<b>4</b>
Private Individuals	<b>41</b>
<b>TOTAL</b>	<b>69</b>

**Response by stakeholder group**



#### **Key points raised:**

- A number of respondents highlighted a shortage of business and industrial units, particularly affordable.
- More flexible planning needed to support the delivery of business development.
- Opportunities exist to develop food and drink sector as well as building on the natural and cultural qualities of the Park.
- Need to improve digital connectivity, broadband and transport infrastructure.

#### **Discussion**

Over half (59%) of respondents to this question were private individuals. However a number of responses across all stakeholder groups raised similar issues in respect of how to diversify the National Park's economy beyond tourism.

Many respondents from across all stakeholder groups were of the view that is a shortage of small business and industrial units which is providing a barrier to new businesses and businesses locating within the National Park. Other respondents highlighted the need for a range of business units from small to large scale that are affordable, particularly for new

businesses. It was also expressed that financial support is needed to encourage small scale businesses and entrepreneurship such as start- up grants provided in collaboration with enterprise organisations.

Promoting the use of Business Improvement Districts within the National Park was also suggested by one NGO as a mechanism for encouraging collaboration among businesses and raising funds to improve the vitality of towns and villages and support existing businesses.

For smaller commercial developments, it was suggested by a number of respondents including private individuals and business interests that planning controls could be relaxed as a way of encouraging business development. Others called for a functional delivery based planning system and policies that welcome diversified business investment. It was also suggested that more planning support for businesses could be provided.

#### *Diversification opportunities*

A number of landowners and business interests' felt that there should be greater support for existing economic activities including land based - forestry, agriculture, sporting, quarrying - and utilising opportunities to create a more positive perception of these activities by showing and teaching the public how they operate as businesses. This also provides an opportunity to link land-based industries with tourism through tours and behind the scenes experiences.

These stakeholder groups also made specific reference to the role of forestry as an important opportunity to support diversification from tourism. This could be done through forestry expansion along with strengthening and developing timber production and processing (including wood fuel supply and delivery) from native species such as scots pine. It was suggested that Reforesting Scotland could support work/information gathering to identify opportunities within the National Park.

A number of stakeholder groups suggested small and appropriately scaled renewable energy projects, particularly hydro would support diversification. One landowner also felt there needs to be a focus on bringing more technical, scientific and manufacturing businesses to the National Park.

One individual suggested that marketing needs to 'go beyond tartan, whisky, castles and shortbread'. However a number of respondents were of the view that local products, particularly food and drink provide a significant opportunity to diversify the National Parks economy. Others felt there are opportunities to utilise and promote the production of high quality niche market food products such as cheese and whisky as well as indigenous species such as venison, grouse, duck and geese. Encouraging supply and demand for produce will encourage development associated with these sectors including abattoirs, game and other processors within the National Park. As highlighted in the previous question, it was suggested that there could be a 'Made in the Cairngorms' status for products.

Private individuals however felt that businesses should focus on the natural qualities of the National Park (particularly environmental) such as re-wilding. One felt that increased community ownership of land resources is needed, with another supporting the development of a sustainable hunting industry outwith the control of private landowners.

Other public Organisations highlighted the need to build more on heritage and promote the National Park as an accessible and inspiring place to live in and do business. This could help encourage more small scale and home based professional and creative businesses. HIE felt that creative industries should be encouraged to make better connection to both the natural and cultural capital of the National park, and particularly Gaelic heritage. It was suggested that HIE, Scottish Enterprise, FCS and the Business Gateway should be identified as mechanisms for delivery.

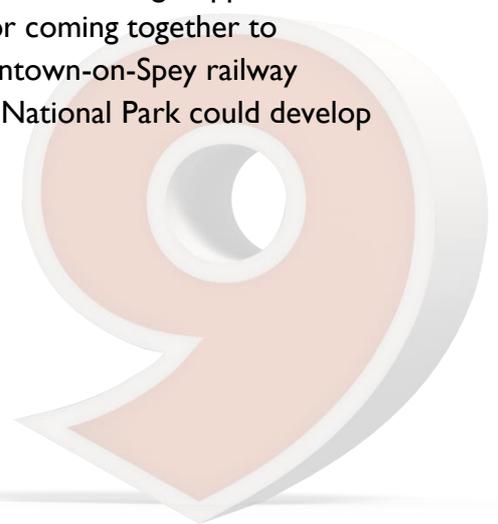
Some stakeholders felt that higher and further education opportunities need to be strengthened. This could be done by improving transport infrastructure to education providers, continuing support for the Skills Development Programme and creation of more modern apprenticeships for farming, fishing, catering and land management. The development of a Tourism Academy was also suggested.

### *Infrastructure*

Digital connectivity and broadband provision has been identified as one of the biggest opportunities across all stakeholder groups. Many highlighted the logistical constraints of geographical remoteness within the National Park however improved digital connectivity means that technology and digital industries can exist anywhere.

A number of business interests highlighted that diversification relies on improved transport infrastructure such as A9 dualling. In order for the National Park to diversify more investment in road and transport infrastructure is needed to improve logistics for businesses. Public transport was also identified as an issue.

The Cairngorms Business Partnership expressed support for a more strategic approach to significant investment projects with the public and private sector coming together to support, influence and lobby for example in relation to the Grantown-on-Spey railway extension. It was also suggested by a Business Interest that the National Park could develop a diversification strategy such as has been done in Aberdeen.



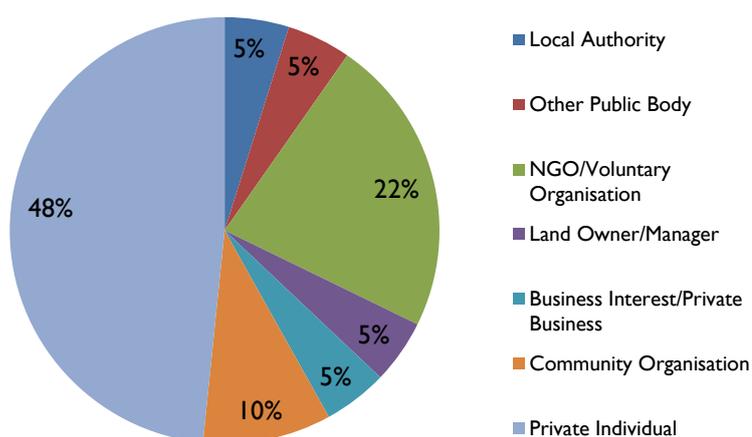
**Question 4: Have the right key infrastructure priorities been identified or are there others that should be included?**

**Overview**

Nearly one fifth of respondents (19%) answered this question.

Respondent type	No. of responses
Local Authorities	3
Other public bodies	3
NGO's/ Voluntary Organisations	14
Land Owners / Managers	3
Business Interests / Private Businesses	3
Community Organisations	6
Private Individuals	30
<b>TOTAL</b>	<b>62</b>

**Response by stakeholder group**



**Key points raised**

- General support for the priorities identified, particularly digital connectivity
- Transport – particularly public transport provision - was highlighted as requiring further support. SNH also identified that green networks and sustainable transport options should be supported to contribute to a low carbon economy.
- Infrastructure priorities should reflect the aims of the National Park.

**Discussion**

The largest proportion of respondents who answered this question were private individuals (58%) who largely agreed with the infrastructure priorities identified.

*Digital infrastructure*

There was continued support from most stakeholder groups for improving digital connectivity and superfast broadband. VisitScotland felt there is a need for a concerted effort to roll out broadband as quickly as possible to benefit businesses. In addition mobile capacity is inconsistent which again critical for small businesses. VisitScotland research

showed that mobile and wifi capacity is the single biggest issue for visitors. A number of respondents felt that this should be prioritised and greater support should be provided to communities to develop solutions. One community organisation specifically welcomed the Cairngorm Community Broadband project.

It was also raised that businesses need a greater online presence and many need to make more effort to provide ‘inspiring, informative, factual and relevant’ content for visitors as well as enabling visitors to book online. Greater focus on skills development and business advice needs to be prioritised to enhance the National Parks competitiveness.

### *Transport*

The issue of transport infrastructure was highlighted across all stakeholder groups. It was raised that connectivity into the National Park is very important such as improving rail-air links to Inverness. A number of community organisations highlighted that greater investment in all public transport (and public transport integration) is needed and should be prioritised. Rail infrastructure was raised by a number of stakeholders as being an area in need of improvement – both the infrastructure and service provided. Another respondent also queried whether the proposed Strathspey railway extension could function as a commercial passenger line too.

SNH added that green travel networks should also be included as part of supporting a low carbon economy. It was also felt that investment should be focused on improving conditions for sustainable modes of transport – provision of electric charging points, buses, trains, walking and cycling – would help improve connectivity between locations and bring significant social and environmental benefits. Core paths and long distance routes which are important for tourism should be supported. One respondent expressed concerns that Active Travel enhancements are only focused in Aviemore and should be spread more widely.

Local road infrastructure needs to be maintained, not just the principal routes such as the A9. It is also important that there is provision for keeping roads open in winter to enable people to work and travel. Another respondent raised that there is a need for safe long term parking and improved provision of informal camping and campervan parking locations.

### *Scale and delivery of Infrastructure priorities*

Concern was expressed by one NGO group that the scale of infrastructure projects could potentially damage the National Park’s environment. A couple of respondents raised concern about An Camas Mor. Both felt that it is unsustainable and would have a detrimental impact on habitats. It was felt smaller scale development and infrastructure is considered more appropriate in the context of the National Park.

Some respondents felt that the infrastructure priorities listed were all projects currently being undertaken by CNPA and would happen whether or not located within a National

Park. It was felt that a more strategic approach is needed by identifying infrastructure projects that are required to meet the aims of the National Park. Another felt that there should be greater focus in the Plan on ways in which conservation and sustainable land-use could improve job opportunities and forestry expansion. One individual felt there should be a greater focus on improving infrastructure on the Ballater and Braemar side of the park as it is felt there is western bias.

The importance of partnership working was raised by one Local Authority who were of the view that opportunities should be sought to work proactively with key partners such as HIE to develop specific targeted strategies and build on the Partnership Plan's policies.

It was queried by one respondent how the infrastructure priorities will be delivered and whether they have committed funding. It was felt that this information should be provided to determine whether a project will realistically be delivered.

#### *Other*

Other suggestions for infrastructure priorities included building on the Cairngorm brand itself –as most activity within the Park is associated with it – and improving further education within specifically Badenoch and Strathspey. The RSPB also added the Osprey centre; Insh Marshes and Dell of Killiehuntly for visitor management should also be investment priorities.



## RESEARCH PRIORITIES

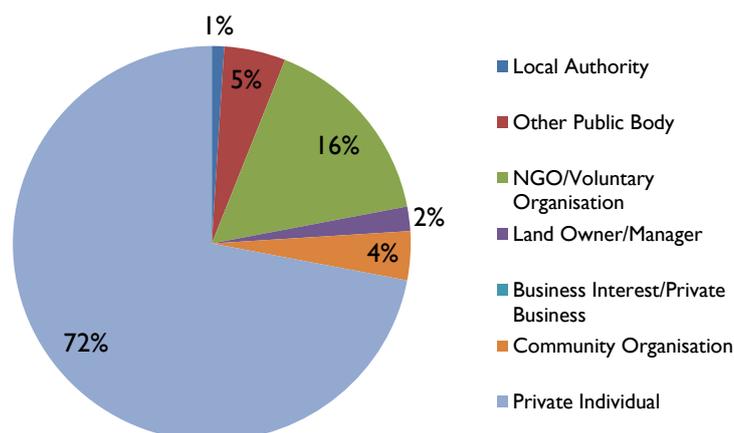
### Question: What are the key research priorities for the next five years and why?

#### Overview

27% of respondents commented on research priorities for the next 5 years.

Respondent Type	No. of responses
Local Authorities	1
Other Public Bodies	4
NGOs/Voluntary Organisations	14
Land Owners/Managers	2
Business Interests/Private Businesses	0
Community Organisations	3
Private Individuals	62
<b>Total</b>	<b>86</b>

#### Response by stakeholder group



#### Key points raised:

- Research needed into conflicts of land management and options for change.
- Detailed research on specific species is needed, particularly in respect of climate change impacts.
- Continued need to monitor and understand visitor needs and activity.

#### Discussion

The majority of respondents who answered this question were private individuals (72%).

#### Land management

The majority of respondents from across all stakeholder groups felt that there is scope for research relating to the National Park's environment and wildlife. A number of respondents raised the issue of land management and how further research is needed into the impacts - including economic and public benefits / dis-benefits - of land management in the National Park including country sports and woodland expansion. Suggested research included wildlife re-introductions, re-wilding and modernising of managed moorland (learning from the Scandinavian example was referred to as well as connectivity mapping to support ecosystem

function), upland habitat and montane woodland restoration, impacts of muirburn on water quality, flood risk and natural flood management and peatland restoration. The RSPB identified the need to examine all land management conflicts and actions to resolve these. The conflicts can exist between intensifying grouse moors with raptor persecution and ecosystem services; woodland expansion with open landscape species and recreational disturbance on protected species and habitats.

Specific research was suggested in respect of the impacts and opportunities for semi natural woodland regeneration such as its contribution to climate change, soil, reducing erosion and wildlife and landscape benefits as well as economic benefits.

Specific reference was made to the need to examine breeding and populations of birds of prey species, mountain hares (including developing sustainable cull plans) as well as other species including Pine Martens, Hedgehogs and Red Squirrels. It was also added that further research is needed in respect of the conservation requirements for Capercaillie as well as wading birds including Curlew and Lapwing (particularly in Grassland and livestock dominated areas). SNH also added that further understanding of the needs of freshwater pearl mussels is needed to address the decline in the River Spey.

It was highlighted by some respondents that a greater understanding of the impacts of climate change on the National Parks wildlife and habitats is needed to understand adaptation and mitigation measures.

Some felt that greater research is needed into the prevention of wildlife crime and how wildlife and their habitats can be protected. It was queried what opportunities and incentives there are to move away from practices that have a negative impact on biodiversity and wildlife, as well as the need for further research to understand the economic and job implications of changing approach.

#### *Visitors*

Some raised the need to further examine the balance between people and wildlife, particularly how to mitigate the disturbance to habitats and wildlife from increasing visitor numbers and supporting development. One individual noted that continued visitor research is needed to monitor changes and understand visitor perceptions and motivations while SNH added that greater understanding of the levels and patterns of recreational activity is needed.

The John Muir Trust added that studies into the benefits of connecting people with nature are needed both in the National Park and more widely. This could include examining the benefits of outdoor learning through structured educational programmes.

#### *Other*

It was highlighted by a couple of respondents that further understanding and research is needed into land reform and the Community Empowerment Act.

One NGO felt there is a need for research in transport modal share as part of reducing dependence on private car and identify where public transport and active travel links are most needed. Sustrans added that a strong evidence base will be needed to justify investment in cycling and walking infrastructure for securing future investment.

Research into options for affordable housing was also highlighted by one community organisation.



## GENERAL COMMENTS

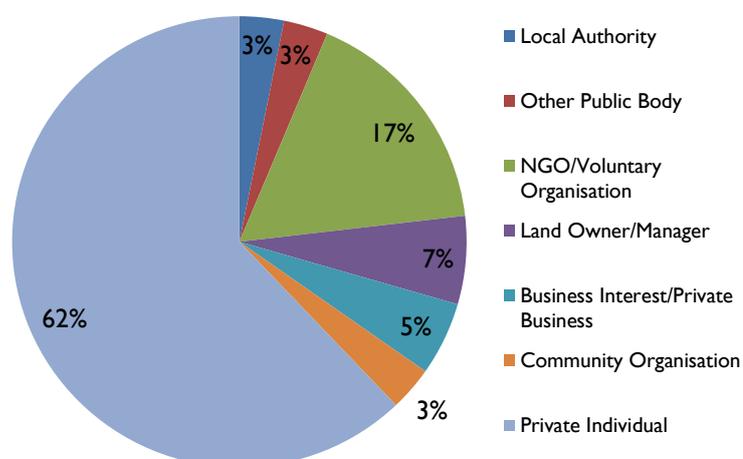
**Question: If you have any other general comments on the proposed content of the Cairngorms National Park Partnership Plan 2017-2022, please let us know**

### Overview

30% of respondents made additional general comments.

Respondent Type	No. of responses
Local Authorities	3
Other Public Bodies	3
NGOs/Voluntary Organisations	16
Land Owners/Managers	6
Business Interests/Private Businesses	5
Community Organisations	3
Private Individuals	59
<b>Total</b>	<b>95</b>

Response by stakeholder group



### Key points raised:

- There is a need to include specific and measurable targets and actions.
- Availability of funding and resources could impact on the delivery of the Partnership Plan.
- Effective partnership working is needed along with greater clarity about roles.

### Discussion

Over a quarter of respondents made general comments in addition to the specific questions. Some respondents used the general comments to provide their full response to the questions, so where these have been covered in the relevant sections, have not been repeated here.

A number of respondents raised issues already identified in other sections of the consultation including the protection of wildlife and the natural environment, re-wilding, protection of heather moorland and its management, cultural heritage, active travel, public transport, path infrastructure, the A9 dualling, housing, visitor infrastructure and experience and broadband. As such, these issues have not been repeated here.

A couple of respondents also raised issues and development proposals specific to settlements including Grantown and Kingussie. However these will be covered (or are best considered through) through the Local Development Plan.

#### *Structure and content*

One respondent highlighted that there is little explanation of the relationship between the draft plan and the current NPPP, and how it has informed the consultation draft. Another respondent highlighted that there is little reference to links with development planning in the document.

A couple of respondents queried why the 9 issues were specifically chosen whilst another Landowner queried whose key issues and questions these are, as they did not feel they reflect those experienced by land managers seeking to achieve the objectives of the National Park. They also expressed concern that the interconnection between the issues is not clear as the delivery of the themes are inextricably linked.

Others felt that the targets and actions are unspecific and vague so it is unclear what the CNPA is hoping to achieve. The final Plan should include measurable targets and details of the resources required to deliver the Plans outcomes. It was also raised by a Landowner that the mechanisms for delivery should include relevant private businesses and their representative bodies.

#### *Natural Environment*

It was noted by some respondents that there is little relating to the National Park's Special Qualities as well as landscape restoration and restoring natural processes. Another respondent was of the view that ensuring high standards of design is key in preserving the special qualities of the National Park. A number of others raised the issue of hill tracks which they felt are having a detrimental impact on the landscape as well as increasing use of motorised vehicles, eroding sensitive areas and polluting water courses.

In addition, one landowner felt that in order to tackle climate change and create a low carbon economy, a change of approach in respect of renewable energy is needed.

#### *Resources*

Some respondents expressed concern about the resources required to address the big issues, particularly with changing public sector funding. One respondent felt that that Partnership Plan should be reviewed as the BREXIT settlement becomes clearer by 2019.

The uncertainty of the future of European funding also has the potential to impact on the National Park and delivery of the Partnership Plan. It was noted by one local authority that the loss of agri-environment funds and programmes such as LEADER could have serious implications for landscape and community development. One NGO added that agriculture

and CNPA's role in the debate and discussion about the future of farming in Scotland should have been raised as an issue.

#### *Partnership working*

A number of respondents highlighted the need for effective partnership working and greater clarity around roles. One public body raised that there are too many partnerships and queried whether it is clear what their role is and relationship to each other. One Local Authority raised that the delivery mechanisms should be reviewed to reflect the groups that the CNPA brings together and those that the CNPA are involved in but led by others. Further detail is required on who is leading specific priorities and the local authority was keen to explore new opportunities to build broader delivery partnerships.

Another local authority raised that there is currently no mechanism in place for partnership working between the Authority's archaeology services and CNPA which will be important in terms of cultural heritage. If the National Park is proposing increased woodland expansion for example, the necessary checks for the sustainable management of historic assets are not in place.

It was also raised by some landowners that more could be done to work in partnership with land based businesses in delivering the Partnership Plan which could be facilitated by Scottish Land and Estates.

#### *Evidence papers*

Some respondents made raised helpful information on detail set out in the supporting evidence papers which are noted.

#### *Other*

One NGO felt that there needs to be a greater emphasis on equalities including policies and also needs to say it is available in other formats. In addition, the Plan should be closely aligned with the National Park's Gaelic Language Plan.



## POLICIES

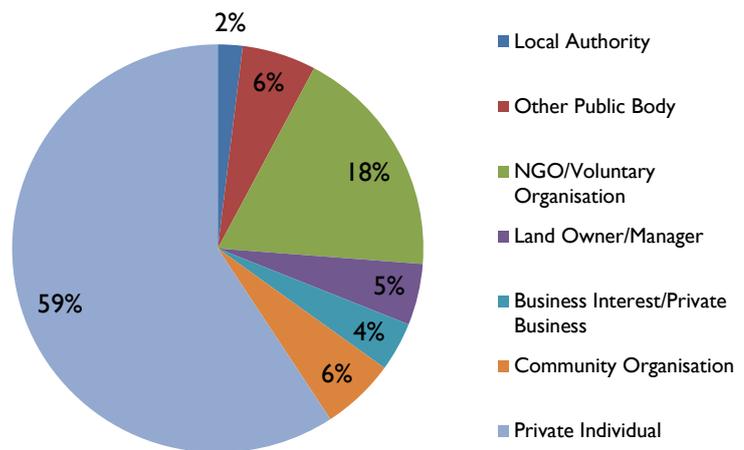
### Question: Do you agree that the proposed policies are appropriate?

#### Overview

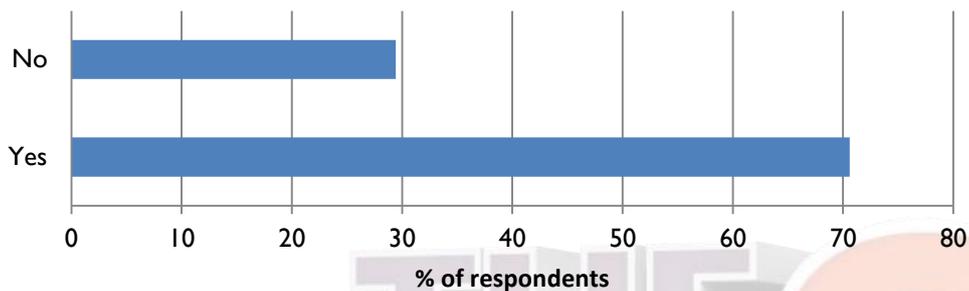
Less than a quarter (21%) of respondents answered this question. Responses were received from a range of stakeholder groups as show below.

Respondent Type	No. of responses
Local Authority	2
Other Public Body	6
NGO/Voluntary Organisation	14
Land Owner/Manager	5
Business Interest/Private Business	4
Community Organisation	6
Private Individuals	61
<b>Total</b>	<b>103</b>

Response by stakeholder group



#### Do you agree that the proposed policies are appropriate?



## Key points raised

- The issues of moorland management and woodland expansion were brought up by many businesses, organisations and private individuals, with some arguing for and against the NPPP's policy approach.
- Some asked that conservation policies be given greater weight than rural development and visitor experience ones.
- The issue of affordable housing and how to address it within the National Park was raised by many responders.

## Discussion

### Policy I.1

Grow the economy of the Park by strengthening existing business sectors, supporting business start-ups and diversification, and increasing the number of workers employed in the Park through:

- a) supporting the diversification of existing landbased businesses;
- b) encouraging growth of business sectors that draw on the special qualities of the Park such as sustainable tourism and food and drink;
- c) broadening the economic base of the Park into sectors such as creative industries, renewable energy, and making stronger links with higher and further education;
- d) increased provision for business land where there is an identified need and demand; and to support the use of land for small business, particularly within settlements;
- e) slowing outward migration of young people; to encourage their return; and the inward migration of workers to the Park to meet business and community needs;
- f) provision of a housing land supply that meets identified need and demand, supports migration of young people and workers to the Park, and maintains vibrant communities;
- g) securing ways to reduce the proportion of vacant and second homes to support community vibrancy and ensure the overall housing supply best meets local needs.

Policy I.1 received the greatest number of responses to the question, with a number of responders suggesting amendments or additions to its wording.

Some expressed concerns over criterion f and g, which represent the housing element of the policy. Some were concerned that a high level of development would harm existing communities. Others feared that the policy was seeking to raise the provision of housing land supply and that large sites such as An Camas Mor were inappropriate. Others suggested amendments. For example one responder believed that criterion f) should be supplemented to reflect a policy focus on building affordable housing for rent and purchase.

The issue of second and empty homes was raised. One responder who represents business

interests within the National Park did not believe that the case has been adequately made that the proportion of vacant and second homes is too high and needs to be reduced. They did however agree that vacant homes need to be brought back into the housing stock as quickly as possible. Indeed further support was raised for filling empty homes, for example SNH stated that they supported criterion g) in view of the challenge in finding sites suitable for housing allocations that won't have adverse effects on the Park's special landscape qualities or on designated sites.

Discussion was also had around the provision of land for economic development. Support was offered for the diversification of our rural economy. One responder suggested the inclusion of an explicit reference to other technology-based businesses delivering through the digital economy. It was also stated that the economy was already dominated by tourism and that encouraging the further growth in tourism is not appropriate if it adversely impacts on other industries. There was also a request that further policy context around making more commercial units available be provided, particularly those suited to the 'incubator' model for small and growing businesses.

Other responders expressed concern that "increased provision for business land where there is an identified need and demand" should not be a Policy. They argued that given the many demands on a highly constrained land supply in the CNP that they We would like to see the provision of business land being handled 'on a level playing field' through the development planning process.

It was suggested by SNH that a more explicit policy direction for agricultural businesses in the CNP be added in light of the prospect of new farming subsidy systems following Brexit.

There was discussion around the use of the term 'young people' under criterion e) and f). Responders raised the belief that encouraging returning young people was essentially the same as encouraging inward migration of workers. They believed that young people should only be encouraged to return to the area to create a viable life for themselves and their families. They went further arguing that the infusion of new ideas and experiences does much to enhance communities. Rather than seeking to pin people down, it was argued that a positive policy would be to welcome and encourage this cross-fertilisation of ideas; and to encourage movement in and out of communities. Consequently they felt that the term 'young people' should be removed from the policy as they are by implication included within the term 'workers'.

Concern was raised that economic growth would have adverse environmental effects.

### **Policy 1.2**

Enable sustainable patterns of settlement growth, infrastructure and communications by:

- a) consolidating the role of the existing main settlements of Aviemore, Ballater, Grantown-on-Spey, Kingussie and Newtonmore, as well as new community at An

Camas Mòr, as the most sustainable places for future growth and the focus for housing land supply while maintaining the integrity of designated sites;

- b) providing any additional flexibility in future land supply for housing at small sites around a wider range of settlements;
- c) supporting sensitively designed improvements to the A9 and other trunk roads and main railway line as an integral part of enhancing the connectivity of the Highlands;
- d) planning and improving integrated and sustainable local transport networks that allow for safe travel off-road and link with public transport;
- e) planning and supporting improvements to the information technology network;
- f) planning and supporting improvements to the mobile communications network that improve access to new generation technology and minimise the need for visually intrusive infrastructure.

Policy 1.2 received a wide range of comments.

Several respondents argued that the settlement strategy should place sustainability at its core and that transport, infrastructure and communications should be key consideration in detriming the location and level of growth.

One organisation with an interest in land management argued that settlement growth should reflect local demand. They went further arguing that designated sites should not prevent the allocation of land for development. SNH supported the policy for this reason but recommend rewording it to more explicitly reflect the SPP travel modes priorities/Transport Scotland travel hierarchy i.e. no travel as the first choice, then walking, cycling, public transport, private car, with air travel as the last resort. The Cairngorms Business Partnership also picked up on the issue of sustainable travel and recommended that criterion d) be amended to reflect the need for improved public transport for both residents of our communities and our visitors. One Community Council argued that the provision of high quality public transport was fundamental to reducing the national Park's carbon footprint/

One Deeside landowner requested that specific reference to Braemar be included within the policy to reflect the investment that was planned for the settlement. They also asked that greater promotion be offered the Deeside area of the National Park in general. It was also asked that greater clarity be provided as to what a "wider range of settlements" meant. It was asked if it just referred to settlements mentioned within the current LDP, or did it apply more widely? Again there was particular concern about how this applied in Deeside and it was cautioned that careful monitoring to ensure that such a flexible approach does not negatively affect demand and development opportunities in this area.

One NGO expressed disappointment with the policy stating that it "to be more or less just continuing the CNPA's current approach to housing and settlement growth", which they believe is unsustainable. They argued that the policy needed to be far more nuanced and needed to reflect the constrained nature of the land supply. They were also concerned that

there was no reference to appropriate scale, or priority for types of tenure of developments and dwellings and therefore felt that the policy did not set the strategic context for the delivery of housing across the National Park. They suggested changing the wording of the policy as follows:

“Enable sustainable patterns of settlement ~~growth~~ **development**, infrastructure and communications by:”

The NGO was also of the opinion that reference to An Camas Mòr should be removed from the policy. It should be noted however that the consultation does not provide the opportunity to object to sites that already have planning permission or are allocated in the current LDP.

Overall they considered that: Policy 1.2 would encourage the unconstrained growth of open market housing, which they argue would be inappropriate in the National Park.

One private individual felt that consolidating the existing settlements would not achieve the levels of house building required to meet the NPPP’s aims. They felt that a plan was needed to build new settlements.

Highland and Islands Enterprise simply endorsed the components of this policy.

### **Policy 1.3**

Support development of a low carbon economy, with a particular focus on:

- a) increasing renewable energy generation, especially biomass and hydro, that is compatible with conserving the special qualities of the National Park and maintaining the integrity of designated sites. Large-scale wind turbines are not compatible with the landscape character or special landscape qualities of the National Park. They are considered inappropriate within the National Park or where outside the Park they adversely affect its landscape character or special landscape qualities;
- b) supporting businesses and communities to use less energy, reduce emissions, improve the energy efficiency of existing buildings, generate low impact renewable energy and plan for a changing climate;
- c) maximising the benefits to communities through direct use of locally generated energy or where sold to the grid, reinvesting income to support community development;
- d) promoting high standards of sustainable design and efficient use of energy and materials in construction.

Generally, support was offered for the development of a low carbon economy and the guidance on wind farm development. However, there was also recognition that many of the policy’s aims would be challenging to achieve. One responder also cautioned that measures should not come at the cost of affordable housing. One respondent suggested that criterion d) was insufficient and that the policy should set out “to achieve world class performance in terms of resources use and re-use, and energy efficiency” . This, they believed was a more

enforceable policy statement to guide planning and building consents.

A great deal of discussion was had around the concept of community benefit. One community council was keen to ensure that communities had the ability to develop their own schemes flexibly. Another responder was of the opinion that much community benefit from the financial planning gain across Scotland has been of low impact to the local economies. They felt that the policy was an opportunity to raise the bar for this within the National Park and thereby securing benefit for the local communities. However, they qualified this with the belief that the policy needed to provide much clearer and exacting guidance on how to maximise economic benefit for the communities.

One NGO noted that they would like to see water courses and aquatic habitats receive the same attention to wind turbines, given they argued, that run-of river hydro schemes can severely reduce water flow, and reduce aquatic health by interrupting the water-borne pathway for migration. They also requested guidance on the types of biomass that the CNPA would encourage. It was also asked if coppice rotation of woodlands, or methane combustion from anaerobic plants were being considered as part of the drive for a low carbon economy? Policies, it was stated, should be providing unambiguous and enforceable guidance.

HIE endorsed the policy, but suggested it should also make explicit the linkage between encouragement of carbon reduction and the reduction of the necessity of commuting, which in turn is facilitated through availability of affordable housing close to where people wish to work. Development of business land should thus facilitate jobs near existing communities.

SNH supported the policy but recommend adding a new point about encouraging business, where feasible, to be located to reduce the need for travel (particularly by private car), and to make use of active travel opportunities through provision of facilities for staff, new businesses locating close to active travel networks/providing connections to such networks, and/or locating near to public transport provision.

They also agreed that large-scale wind turbines were not compatible with the landscape character or special landscape qualities of the National Park. They considered turbines to be inappropriate within the National Park or where outside the Park they adversely affect its landscape character or special landscape qualities. They would welcome further discussion of the exact wording / accompanying guidance on wind turbines as they are of the opinion that it would be helpful to have more clarity on the scale of adverse effect that is inappropriate. It's likely that most wind turbine development in these locations would have some degree of adverse effect, individually or cumulatively.

However, a responder with an interest in land disagreed that large scale wind turbines were not compatible with the special qualities of the National Park. They were of the opinion that the designation should not prevent such developments, both within and outwith its boundary, from taking place. They felt that the elevated plateaus surrounding the National

Park were perfect for such developments and argued that the needs of residents, our society, environment and economy should be balanced against designated sites and their designated features.

While SEPA considered that waste issues are currently satisfactorily addressed through the Cairngorms National Park Local Development Plan, they believe that the NPPP provides an additional opportunity to support the delivery of Scotland's Zero Waste Plan and the ambitions to maximise the reuse of resources and recycle up to 70% of all waste by 2025. In order to achieve this, they recommend including additional wording to criterion (b)

b) 'supporting businesses and communities to use less energy, reduce emissions, improve the energy efficiency of existing buildings, generate low impact renewable energy, **reduce, reuse and recycle resources** and plan for a changing climate';

SEPA also consider that the benefits that could be delivered through district heating should be appropriately referred to, and recommend rewording section (c) to read:

c) 'maximising the benefits to communities through direct use of locally generated energy, **for example through district heating**, or where sold to the grid, reinvesting income to support community development;'

#### **Policy 1.4**

Support and build the capacity of communities to deliver their aspirations, with a particular focus on:

- a) supporting communities to plan for their own futures, develop and implement projects, engage the support of partners and share good practice;
- b) supporting innovative approaches to providing affordable housing to meet local needs;
- c) aligning community planning processes to simplify support to communities;
- d) engaging communities effectively in the long term management of the National Park and in projects or programmes that affect them.

HIE welcomed the policy to build capacity within communities and to include community-based solutions as part of the mix of solutions to address the urgent issue of affordable housing. Another responder supported the policy, but noted that most communities are run by volunteers, who as well as helping to run their communities have other lives to live. Another responder asked that the policy be amended to include support for business that provides for the needs and aspirations of local communities.

SNH recommend clarifying that this policy applies to communities both of place and interest, and considering whether any additional points are required to reflect the needs of the latter.

#### **Policy 2.1**

The management and use of land should deliver multiple benefits – delivering the best possible combination of the National Park Partnership Plan’s long-term outcomes, always ensuring that the integrity of designated sites is maintained; and that the special qualities are conserved and, where possible, enhanced. This will be supported by:

- a) a long-term planned approach by landbased businesses to delivering environmental, economic and social benefits;
- b) support for land managers to plan and deliver environmental and social benefits underpinned by sound economic businesses;
- c) research to support an ecosystems approach to management.

One responder felt that the policy should make reference to food production and ‘sound economic business’ .

One responder argued that only those land based activities that support and enhance the key natural heritage habitats, attributes and species across the whole park should be supported.

SEPA had a minor rewording recommendation for this policy: “The Management and use of the land.....designated sites maintained; and that the special qualities **of the Park** are conserved and, where possible enhanced”.

## **Policy 2.2**

Enhance the resilience of habitats, species and land use to climate change with a particular focus on:

- a) collaborating on land use and flood management, including natural flood management, through river catchment management plans;
- b) enhancing the health and connectivity of habitats;
- c) securing effective management of peat and carbon-rich soils.

Generally, the thrust of the policy was supported, with a few caveats and amendments.

The CBP suggested adding that proposals under criterion a) need also to ensure that the economic viability of the designated sites for the landowner are also maintained.

Another responder with an interest in land use stated that while they agreed with the desire to make our habitats and land use more resilient to climate change and with collaboration on flood management, they disagreed that the integrity of designated sites should be maintained where it interferes with collaborative flood management and the protection of our land and its use.

Another responder requested that policies on upland management, intentions to retain flood waters within the catchment, retention of riparian woodlands, presume against increasing run-off and the construction of man-made engineered flood embankments etc be

added. The highlighted the importance of the Dee, Don and Spey as designated habitats and that they should be properly supported in this section.

SNH's view was that it will be important to establish robust mechanisms to enable the "health and connectivity of habitats" to be measured, monitored and reported. They added that proposals arising from the river catchment management plans will always ensure that the integrity of designated sites is maintained. SNH also recommend rewording to criterion c):

c) securing effective management of peat and carbon-rich soils **and restoring them where they are degraded.**

SEPA welcomed the reference to river catchment plans, and welcomed the opportunity to contribute to these and help to co-ordinate their development. They also requested that one of the policies in policy section 2 should include a direct reference to protecting, and where required, improving the water environment in the Cairngorms. They thought that it may sit best in Policy 2.4 and have suggested the rewording of that policy. They also requested that the last bullet point of Policy 2.2 be amended as follows:

c) securing ~~effective management of peat and carbon-rich soils~~ **protection and sustainable management of peat and carbon-rich soils.**

HIE endorsed Policy (and policies 2.2 to 2.8). However, in addition, the highlighted that Gaelic was an important cultural asset and it would be useful to add a reference to the benefits to be gained from supporting this aspect of cultural heritage.

### **Policy 2.3**

Conserve and enhance the special landscape qualities with a particular focus on:

- a) conserving and enhancing wildness qualities;
- b) maintaining and promoting dark skies;
- c) enhancements that also deliver habitat improvements;
- d) enhancing opportunities to enjoy and experience the landscapes of the Park.

The few responders who commented on the policy both supported and objected to its contents.

Support was caveated with the opinion that views should be maintained from the low ground by managing trees and woodlands. It was also felt that easy grade paths should be a key part of enhancing opportunities to enjoy and experience the landscapes of the Park

One objection was received, who argued that perceptions of wildness should take precedent over economic development and contributions to mitigate climate change.

Another respondent argued that the policy needs to be strengthened. They felt that wildness qualities must be retained and increased and that there should be a presumption

against development and land uses that undermine and detract from these key landscape attributes. They felt that the use of the term “a particular focus” was not defensible in planning terms; and consequently the policy would not likely be effective.

#### **Policy 2.4**

Conserve and enhance habitat quality and connectivity, with a particular focus on:

- a) woodland enhancement and expansion, especially montane, farm and riparian woodlands;
- b) wetland enhancement;
- c) delivering a combination of ecosystem services including natural flood management, carbon sequestration and storage, timber and food production.

A range of comments were made on the policy, both in support and objecting to its contents.

Support was found for the expansion of productive forestry as well as forestry that delivered ecosystem services.

Several responders asked if the policy’s remit could be extended to include a particular focus on heather habitat management while another objected to the expansion of montane scrub woodland. One responder also questioned the value of wetland enhancement.

SEPA recommended the following amendment to the policy’s wording:

Conserve and enhance habitat quality and connectivity, with a particular focus on:

- a) woodland enhancement and expansion, especially montane, farm and riparian woodlands;
- b) wetland **conservation and** enhancement;
- c) protection and improvement of the water environment;**
- d) delivering a combination of ecosystem services including natural flood management, carbon sequestration and storage, timber and food production.

SNH raised concern that woodland expansion could have negative effects on certain protected sites. For example they cite that some SACs (e.g. Beinn a’Ghlo and Cairngorms), would be adversely affected as a consequence of the potential for loss of qualifying open ground habitats due to conversion to woodland; and) some golden eagle SPAs (e.g. Cairngorms Massif), due to potential loss of foraging habitat. In order to address this they recommended that the opening line of the policy be altered as follows:

Conserve and enhance habitat quality and connectivity **while ensuring the integrity of designated sites is maintained**, with a particular focus on:

It was also requested that all Core Paths, priority community routes, wider networks, long distance routes etc. are signed, promoted and graded (where appropriate) using new Path

**Policy 2.5**

Conserve and enhance the species for which the Cairngorms National Park is most important, with a particular focus on:

- a) species whose conservation status is in decline or at risk;
- b) tackling and reducing the impacts of invasive non-native species;
- c) engaging people on species that are important in the National Park.

A mixture of responses were received about this Policy, some in support and some objecting to its contents

One responder stated that they disagreed that all species locally in decline or at risk should be conserved. They cited that capercaillie and ptarmigan were not endangered globally and therefore allocating resources towards their conservation was wasteful. They argued that promoting a particular species as important when it is perceived as a threat to the livelihood of some land occupiers could risk alienating land occupiers from the Cairngorms National Park Authority. They added that the CNPA should not dictate what residents perceive as important species.

Another responder felt that the policy should go further and recognise that maintaining the habitats that support these iconic species is most important in maintaining their good health. They also felt that recognising bio-invasion was missing from the policy. They argue that bio-invasion is a serious threat and one in which prevention and early intervention are very significant, and far less expensive to correct by being proactive rather than by reactive measures. It was added that during the current period of climate change our habitats are losing resilience and at increased risk from negative impacts of invasive non-native species. They felt that the CNPA should have targets for specific geographical areas and habitats to be Invasive Non-Native Species-free. Integration with planning policy, guidelines, and planning permission conditions that recognise gardens introduce invasive species into the countryside beyond the garden fence

One responder recommended the inclusion an additional criterion:

- Promoting biological recording of species in the Park

**Policy 2.6**

Support collaboration across ownership boundaries and between interests to reduce conflicts in species and wildlife management including:

- a) deer and moorland management;
- b) wildlife crime;
- c) species reintroductions.



Very few responders commented on Policy 2.6. Those that did expressed support for collaboration and co-operation across ownership boundaries and between interests. One responder qualified their support being dependent on the species to be reintroduced. Another suggested that particular species reintroductions could be identified in the Plan for active investigation and implementation.

### **Policy 2.7**

Conserve and enhance the cultural heritage that helps to create the sense of place and identity of communities within the Park by:

- a) protecting archaeological sites and their settings and promoting understanding of their significance;
- b) ensuring appropriate advice and investigation for archaeology is used to inform proposals for land use change;
- c) protecting and enhancing the built heritage and designed landscapes;
- d) promoting opportunities to enjoy and celebrate the cultural heritage of the Park.

This policy was broadly supported by the few responders who commented on it.

However, it was felt that the policy did not allow for partnership working between the relevant Local Authority Archaeology Services and the CNPA. Aberdeenshire Council suggested that in order to successfully deliver this policy aim an agreement should be sought between the key stakeholders over the provision of up-to-date and accurate information on the location of archaeological sites, and the provision of appropriate expert advice over the management of those sites with regard to development management, forestry, land management, and tourism. They added that Aberdeenshire Council Archaeology Service would welcome the opportunity to explore the options for such a partnership.

Concern was also expressed that there was no mention of aiding community heritage groups, which do work producing leaflets or delivering on projects to enhance their local heritage both for locals and visitors.

Clarification was also asked as to what 'cultural heritage' meant.

### **Policy 2.8**

Enhance the design and sense of place in new development and existing settlements, in particular:

- a) enabling new development which contributes positively to the sense of place;
- b) promoting a high standard of sustainable design, energy efficiency, sustainably sourced materials and construction in new development;
- c) supporting the retention and enhancement of local character;
- d) facilitating the rehabilitation of redundant rural buildings and recycling of resources;
- e) ensuring road upgrades and improvements respond to local landscape character.

Concerned was raised about the way in which existing settlements have been historically expanded with one responder arguing that housing schemes were out of character with the original village and architecture. They were concerned at the breakdown in interest and support between residents in settlements and their surrounding rural economy.

Another responder cautioned that, while they supported the policy, they should not be implemented at a barrier to development taking place.

One responder recommended an additional two criterion:

- “promoting active travel and public transport provision, reducing the reliance on the private car” and
- “using design awards and design review forums to both encourage and recognise high quality design and share good practice”.

There was support for the rehabilitation of redundant rural buildings and recycling of resources as well as for the use of locally sourced materials in construction. SEPA supported the policy because it promotes a high standard of sustainable design, energy efficiency, sustainable sourced materials and construction in new development.

### **Policy 3.1**

Provide a welcoming and high quality National Park experience for all by:

- a) delivering a visitor/customer experience that spans organisational boundaries;
- b) providing high quality co-ordinated information setting visitor experiences in the context of the National Park;
- c) enhancing the provision of ranger services to deliver visitor welcome and resource protection;
- d) building on the National Park brand and the promise it delivers.

Support was offered for the desire to provide visitors a high quality experience. Furthermore, support was offered for the co-ordination of information setting visitor experience in the context of the locality, the district, the Highlands and Scotland. This support was however on the condition that the co-ordination of visitor information and experience was not just within the Cairngorms National Park and that it reflected what was on offer in the broader highland area. It was argued that the Cairngorms National Park should not be advertised and promoted as a visitor destination at the expense of rural areas elsewhere in Scotland.

Support was provided for Policy 3.1 (as well as 3.2 and 3.3) providing they are looking to encourage visitors to all areas of the National Park.

The provision of ranger services to co-ordinate and manage visitor facilities and experiences as well as to interpret and inform about our cultural and natural heritage was supported. However it was also noted that 'Supporting the network of ranger services in the National

Park' has been removed from the policy and replaced with bullet c) we believe that it is important that the National Park Authority continues to enable, support and enhance existing professional private sector ranger provision. SNH recommend rewording criterion c) to:

c) enhancing the provision of ranger services to deliver visitor welcome and ~~resource protection~~ **promote responsible access.**

SEPA welcomed part c of this policy because it enhances one of the mechanisms which can help secure resource protection in the National Park.

### **Policy 3.2**

Promote sustainable tourism management with a particular focus on:

- a) co-ordinated promotion and management of the Cairngorms National Park as a visitor destination;
- b) ensuring high quality facilities and infrastructure are designed to manage the effects of visitor pressures on the natural heritage and communities;
- c) implementing and reviewing the strategy and action plan for sustainable tourism in the Cairngorms National Park.

No comments were received on policy 3.2.

### **Policy 3.3**

Provide high quality opportunities for access and recreation, with a particular focus on:

- a) ensuring a high quality functional network of core paths and long distance routes;
- b) promoting the health benefits of outdoor recreation;
- c) identifying areas where particular management measures are needed in relation to delivering a high quality visitor experience, safeguarding sensitive environments and maintaining the integrity of designated sites;
- d) promoting responsible behaviour in enjoying and managing access.

In general, the few responders who commented on the policy were supportive of its contents.

Concern was however raised at the perceived lack of provision for ongoing maintenance of path networks and associated facilities.

SNH suggested the addition of a new criterion about enhancing volunteering opportunities. They suggested that this criterion could alternatively be included under Policy 3.4.

SEPA welcomed the policy, particularly point c. However, depending on the exact meaning that is intended, they also suggested that the following rewording may strengthen the policy:

- c) identifying areas where particular management measures are needed in relation to

delivering a high quality visitor experience **whilst** safeguarding sensitive environments and maintaining the integrity of designated sites.

#### **Policy 3.4**

Provide opportunities for inspiration, learning and understanding through engaging with people, with a particular focus on:

- a) young people;
- b) opportunities to deliver the curriculum for excellence;
- c) promoting a sense of shared ownership and responsibility towards Scotland's National Parks and rural environment

There was broad support from the few responders who commented on the policy.

SNH suggested the addition of a new criterion about enhancing volunteering opportunities. They suggested that this criterion could alternatively be included under Policy 3.3.

SEPA welcomed this policy because it aims to promote a sense of shared ownership and responsibility towards the rural environment. Another responder offered support providing that it was recognised that 70% of the rural environment is farm land producing good healthy food which everyone needs.

Support for the provision of opportunities for learning and understanding our natural and cultural heritage along with current economic activities and land use was also offered.

Given the range of organisations involved who contribute to the Curriculum for Excellence, it was suggested criterion b) should read:

b) opportunities to ~~deliver~~ **support the delivery of** the Curriculum for Excellence.

This it was argued would demonstrate the collaborative approach for this national outcome.

A further request was that the policy make explicit mention of the need to encourage more Further and Higher Education activities taking place within the Park area.

#### **General comments**

As would be expected a large number and wide variety of general comments were submitted about the policies of the NPPP.

A number of comments were made specifically relating to the conservation policies, with many of these focusing on issues around moorland management, woodland expansion and raptor persecution. Several respondents argued that without changes to moorland management practices or changes to the way government interacted with the grouse shooting industry, then it would be difficult to affect woodland expansion or reduce wildlife

crime. Another felt that wildlife crime was not dealt with in the policies at all and suggested that monitoring, investigating and prosecution were needed to deter those who would break the law.

Conversely, one respondent felt that too much criticism was being directed towards moorlands and that they were one of the National Park's most special features. They felt that they should not be subordinate to woodland and that there was room in the National Park for both types of vegetation cover.

Several respondents commented that working in partnership was key to delivering the policies and to ensuring that they benefit not only biodiversity, but also local communities and visitors to the National Park. Another responder however was of the opinion that the CNPA would achieve little in the way of ecosystem improvement until it "accepts that it cannot achieve this as an 'enabling' organisation". They argued that the CNPA needed a much bolder vision and a much more driven transformative leadership.

One responder asked that the CNPA play an active role in identifying appropriate species for reintroduction and the time scales and mechanisms for doing so. They also argued that the advice given over the years by the Deer Commission for Scotland and its predecessors should be carried through and that political and practical support be offered to landowners which reduces the head count of red deer and sheep on their land and moves away from economic models based on hunting and shooting. They felt that this was essential if woodland cover was going to be significantly increased within the National Park.

Another responder felt that the order of the Long Term Outcomes should be changed so that "Long-term outcome 2: A special place for people and nature with natural and cultural heritage enhanced" (along with its associated policies) was listed first. This they felt would reflect first National Park Aim as set out in the National Parks (Scotland) Act 2000. Indeed it was argued by another that Nature conservation should be top priority within the NPPP. A resilient natural environment, they argued, was crucial to mitigate the effects of climate change and other human induced environmental changes (eutrophication, acidification, etc.).

Only one comment specifically related to Visitor Experience and this simply asked that CNPA and its partners continue to make improvements and be 'one step ahead', otherwise they felt, the National Park would lose visitors, revenue, negatively impacting on the economy and causing people to move away.

There were a number of general comments specifically relating to Rural Development matters. One responder felt that the NPPP's policies were too concerned with what they felt were forms of unsustainable economic development, citing additional housing and development of renewable energy schemes as examples. They argued that quality, sustainable development will be available now and in the future with sufficient funding and support, so the focus should be on the natural environment. The Highland Council

welcomed the policy directions on housing. Another responder asked why certain business sectors were to be picked out for support. They felt that public bodies should not subsidise 'failing businesses'

Many more general comments were received, which did not relate to any specific policy areas.

General support was received from a number of respondents, including Local Government, Community Councils, other public bodies, NGOs and private individuals.

RSPB Scotland were concerned that the inclusion of these policies appears to be inconsistent with the approach taken to the consultation as a whole, which seeks comments on general issues. They believed that it would be more appropriate for the CNPA to draft revised policies and consult on them once they had considered the feedback received in relation to the current consultation, as logically, they argued, that should inform the proposed policies. They however welcomed the commitment made by CNPA to work with partners such as RSPB to continue to develop the NPPP and set clear priorities and a policy framework.

Another NGO felt that the policies should be re-ordered to better reflect the listing of the four aims set out by the National Parks (Scotland) Act 2000, and stated at the start of the NPPP. They felt that the emphasis on nature/culture is what differentiates the National Park from most other pieces of land on the planet and gives it a uniquely special ethos.

Paths for All offered examples of documents that reflected the wider policy context within their area of interest:

- The National Walking Strategy
- The Scottish Government's Active Scotland Outcomes Framework
- Physical Activity Strategy
- National Physical Activity Implementation Plan
- Cycling Action Plan for Scotland
- A Long-Term Vision for Active Travel in Scotland 2030

Bòrd na Gàidhlig noted that there was no mention of Gaelic in the NPPP even though the Cairngorms National Park Authority and many of the public sector partners across the park area have approved statutory Gaelic Language Plans. They felt that it would be useful if the NPPP could clarify the Cairngorms National Park Authority's support for Gaelic and how this will be promoted across the partners. They felt that Gaelic should be mentioned in the NPPP as a 'special quality' of the National Park. They argued that there should be targets in the NPPP connected with conserving and enhancing cultural heritage along with natural heritage, in order to fully meet the statutory obligations of Park. They felt that it may be the case that a further high-level aim is required to make it the Big 10, suggesting new

outcome that reads:

“that everyone who visits the Cairngorms National Park leaves knowing more about the natural and cultural heritage of the area”

One responder felt that there in practice there were two National Parks, with a dividing line from Grantownon-Spey to the Linn of Dee.

Scottish Campaign for National Parks did not wish to comment in detail on the proposed policies but were concerned that they should all adhere to SMART principles. They felt that a number of the policies were fairly general and there should be more specific, measurable, action orientated, resourced adequately and make a real difference in the 5 year Plan timescale. They asked that the final NPPP contain a refined list of policies and related actions have clear targets and named partners to lead delivery with some idea of scale of resource implications.

One responder asked who the ‘partners’ of the NPPP were. They felt that business and commerce interests, developers, and the ‘game’ shooting industry were undesirable.

There was a request that quantified targets be included within the NPPP for monitoring purposes.

Another responder asked that the National Park should be established as a World Heritage Site and that its boundary be expanded towards Fort Augustus to better protect its surroundings from renewable energy developments.

The opinion that there was too much emphasis on people within the NPPP was also expressed. A more ‘American’ National Park model was suggested and that all the land within the Cairngorms National Park be nationalised.

One responder felt that there was not enough detail within the NPPP and that more definite plans needed to be proposed.



## **APPENDIX I – LIST OF RESPONDENTS**

### **Local Authorities**

The Highland Council

Moray Council

Angus Council

Aberdeenshire Council

### **Other Public Bodies**

Norwegian Institute for Nature Research

Forestry Commission Scotland

Scottish Water

Highland and Islands Enterprise

VisitScotland

SEPA

NHS Highland

Scottish Natural Heritage

### **NGOs/Voluntary Organisations**

The Heather Trust

Natural Resources Scotland

Real World Riding

Transform Scotland

Badenoch & Strathspey Community Transport Company

Caledonian Foresters

Teemouth bc

Friends of the Earth Falkirk

Deeside Gliding Club, Aboyne



Highland Folk Museum  
Walk on the Wildside  
Mountaineering Scotland  
Feis Spe  
Let's get mad for wildlife  
Speyside Moorland Group  
Royal Botanic Garden Edinburgh  
Scottish Ornithologist's Club, Lothian Bird Recorder  
Scottish Countryside Alliance  
Braemar Outdoor Group  
The National Trust for Scotland  
Scottish Moorland Group  
Tayside Biodiversity Partnership  
Ourland Badenoch and Strathspey  
Tomatin Moorland Group  
North East Mountain Trust  
Scottish Raptor Study Groups  
Sustrans Scotland  
Paths for All  
River South Esk Catchment Partnership  
Ramblers Scotland  
RSPB Scotland  
Scottish Gamekeepers Association  
Tomatin Moorland Group  
John Muir Trust  
Grampian Moorland Group



Tomintoul & Glenlivet Development Trust  
Cairngorms Campaign  
Bòrd Na Gàidhlig  
Inclusive Cairngorms  
Scottish Campaign for National Parks  
Association of Deer Management Groups  
Badenoch and Strathspey Conservation Group  
Game & Wildlife Conservation Trust (Scotland)  
Cairngorms Local Outdoor Access Forum  
Cairngorms Outdoor Access Trust

**Land Owners/Managers**

Phoines Estate  
Atholl Estates  
Corrour Estate (Lochaber, by Roybridge)  
Dalhousie Estates  
Pitmain Estate  
Mar Estate  
Bidwells  
Invercauld Estate  
The Crown Estate Scotland Portfolio  
Wildland Ltd and Glen Feshie Estate  
Dunnecht Estates  
Seafield Estates  
Allargue Estate  
Badenoch Land Management Ltd  
Rothiemurchus Estate



## **Business Interests/Private Businesses**

Cairngorm Collectables

Cateran Camping

Crubenbeg Highland Holiday Cottages

Coast2Coast Architects

Dunrobin Sporting

James Shooter Photography

auld alliance antiques

Landcare NorthEast

Ballater (RD) Ltd

Aviemore Adventure, holiday cottages in Aviemore

An Camas Mor LLP

JM Osborne & Co. Limited

AW Laing Ltd

Painter & Decorator

Grantown Enterprises Ltd

Ingram Builders Ltd

Badenoch Roofing Ltd

Roots and Shoots Highland CIC

W J Sellars Builders Ltd

SAB plumbing and Heating Engineers

Ingram Builders

Scottish Land & Estates

Cairngorms Business Partnership



### **Community Organisations**

Killiecrankie & Fincastle Community Council

Ballater & Crathie Community Council

Kincraig & Vicinity Community Council

Cromar Community Council

Aviemore & Vicinity Community Council

Blair Atholl and Struan Community Council

Inveresk Community Council

Kincraig and Vicinity Community Council

Kingussie Community Council

Laggan Community Council

Boat of Garten and Vicinity Community Council

### **Private Individuals**

211 private individuals

