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Economic Action Plan 2019 - 2022, Cairngorms National Park Authority (CNPA).

Consultation Response from the Cairngorms Campaign.

The greatest disappointment in the Economic Action Plan 2019 – 2022 is the complete absence of any significant changes in approach to address the crisis we are facing with climate change and loss of biodiversity. While there is recognition of the need to do this in Section 4 “Review of Changes in Strategic Context” the actual content of the Action Plan could have been written 15 years ago with some minor changes to reflect technology developments. There is no change in content that addresses the crisis the planet is facing and there are many actions that continue to contribute to the problem. It is vital that an economic action plan addresses this as what “is good for the economy” has historically been used to justify development and is the reason humans have created this planetary crisis. What “is good for the economy” must be scrutinised more thoroughly and the consequences of development grasped in their entirety.

We would like to see a stop to actions contained in the plan that add to emissions causing climate change and biodiversity loss. Since this is a 3 year plan this should include actions that may be resolved after three years, for example car transport may be more acceptable when electric cars are more common and powered by non-environmentally damaging fuels. Here are some examples of the actions contained in this plan that should be halted:

1. Construction: Stop building houses that will be used for second homes and only provide houses that meet the needs of people living or working locally, to reduce travel and ensure these houses can remain so.

The “Economic Action Plan” contains the statement that “The proposed Local Development Plan (LDP) 2020 will, once approved, increase the proportion of affordable housing from 25% to 45% in some communities” and the target numbers over 30 years show that over half of new housing will be unaffordable.

Construction is a significant contribution to both climate change and biodiversity loss and the CNPA should only enable the construction of houses that directly support the local businesses and ensure that these are emission neutral.

It is a reflection of the failure of housing policies to see that, on page 11, “More housing is being bought as second and holiday accommodation and there are signs of increasing community concern about the social impact of holiday homes” as this has been a problem since before the CNPA was formed. A step change in attitude is essential.

Stop the proposal to build a new town at An Camas Mòr, which is on green space and will destroy the numerous species there, adding to biodiversity loss. You have received objections from many conservation organisations about this development and it is clearly felt to be against the number one aim of the National Park. There are few better examples where the “economy” is being used to destroy the natural environment.

2. Stop approving stop gap solutions for skiing on Cairngorm until a carefully considered master plan is produced. Downhill skiing and everything associated with it adds to the climate change crisis and the working practices on Cairngorm are adding to biodiversity loss. Downhill skiing is not an essential and there are alternatives for people to enjoy. Again the human race has to address the need that some of our “nice to haves” have to be given up, at

least for a while, otherwise we will have much larger problems to handle and such activities will disappear as an option anyway.

3. **Stop promoting driving around the Cairngorms, for example the “snow road”.** In addition to emissions, vehicles produce brake dust, rubber from tyre wear, litter, noise and death for wildlife.
4. **Stop allowing the Cairngorms to be publicised as an “eco-tourism destination” just because it involves nature and instead raise awareness on the difference between the ways in which one can be a true environmentally friendly tourist.** For example driving a fossil fuel emitting car or flying is not an eco-friendly holiday. It would be less of a negative impact on the environment to take public transport to and around a city for a vacation.

There are a number of actions that should be started to help turn around the loss of biodiversity and make a contribution to reducing emissions that damage the environment. Here are a few suggestions

1. Redefine the use of the word sustainable, and maybe use different terminology, but ensure the actions underlying the use of the term are credible and used only when it is factually correct. The word “sustainable” has been so abused and is so commonly used to justify anything of “economic” value that it has lost all credibility.
2. Be more specific when talking about “affordable” and whether these houses will stay “affordable” in perpetuity. Define what affordable means e.g. the % of National Park households that are likely to be able to buy or rent such accommodation. Again the word is used too generally and with a continuing housing need is losing credibility. Like “sustainable” it comes across as a term used whenever someone wants to justify a new housing development.
3. All new building should be to ultra-low energy building standards to reduce demand on energy supplies, such as passivhaus, see https://en.wikipedia.org/wiki/Passive_house These standards are already in use, as in Norwich for social housing, see <https://www.theguardian.com/artanddesign/2019/jul/16/norwich-goldsmith-street-social-housing-green-design>.
4. Raise awareness of the Climate Change crisis and loss of biodiversity with visitors. For example on the CNPA website talk about it on the front page. Illustrations of the most threatened species in the Cairngorms could be used and why they are affected. Explain what visitors could do to make a difference by having articles on the “most climate friendly” activities at the front of the website. For example, encouraging people to stay 3-4 days in one location and explore it in more detail by walking or cycling rather than driving around and staying just one night with all the consequent cleaning every day for the owner/business. Move less environmentally friendly activities down the website and explain their impact.
5. Plan an electric transport charging network around the National Park
6. Work towards all electric and/or hydrogen public transport and extend the network to and from popular destinations.
7. Start working with businesses to remove all single use plastic in the National Park
8. Develop a climate positive rating for businesses that is a “journey” over several years to match national plans. Make it a programme that, now, would be considered tough and stretching. It would probably be necessary to begin with awareness training and workshops and encourage adoption of existing practices and then continuing so that as new ideas and technologies arise they can be adopted and the business can progress up the standard. One could imagine a staged approach with each stage named after a threatened species. We need something much more than the “green tourism” award which seem to be earned by having some recycling bins in place and hand driers rather than paper towels in the toilets.
9. One of the problems with the Park communications within each plan is that the net effect of the CNPA plans is never reported. For example, figures quoting tree planting or peat land restoration are provided but not the overall net balance allowing for losses from activities such as hill roads, felling, muir burning and construction. Consequently there is no visibility of the net impact which is what is most relevant.

The above are just some initial ideas and we are sure that if the CNPA was to make a change in its approach and really face up to the challenges of climate change then a lot could be achieved.

To repeat what stated at the start of this response – the “economy” and consequent consumerism has driven the destruction of our natural resources. To address the crisis the human race has created we have to make, what may seem now to be, radical and difficult changes and shift our thinking. If we do not then the future for billions of people and our natural environment will be devastating. So we are asking the CNPA to have a good hard look at this economic action plan, take it to pieces and rebuild it with the climate crisis and biodiversity loss in mind, while taking care of the least well off in our society. We realise that this may not seem easy as there are many current influences that act in opposition, influences that are accepted as good for us, despite evidence to the contrary. A three year economic action plan can only contain a part of what is needed. The most significant achievement that could be made immediately is to change the direction of travel.

On behalf of the Cairngorms Campaign



9th September 2019