

Consultation Title: Cairngorms National Park: Economic Action Plan 2019-2022

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To: CNPA

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Scottish Land & Estates (SLE) is a member organisation that uniquely represents the interests of both land managers and land-based businesses in rural Scotland. SLE has members with interests in a great variety of land uses which makes them well placed as important delivery partners in meeting the Aims of the CNPA. We therefore welcome the opportunity to respond to this consultation.

We should note from the outset that some SLE members have indicated to us a reluctance to contribute to this consultation because there is a perception that views of land-based businesses are not being listened to. While we understand that the CNPA must take account of a variety of sometimes opposing views in reaching its conclusions, there is a growing perception that CNPA strategies and plans do not reflect the concerns, needs or aspirations of those who live or work within the Park and is resulting in an apathy on the part of many to respond to consultations.

Another recurrent view from our members is that there needs to be a reprioritisation of CNPA resources to focus on delivering for the local economy – one of the four Aims of the Park. There is a current perception that most of the resources are focused on supporting the other Aims, particularly; natural and cultural conservation and promotion of enjoyment of the Park.

Questions

- 1. Are there any other significant economic trends, challenges, opportunities or data sources that we should be taking into account in developing this Economic Action Plan?**

[The Economic, Social and Environmental Contribution of Landowners in the Cairngorms National Park](#) highlighted that direct income from activities carried out by respondents totalled £28.1M. Of this income, 21.6% is from agricultural land, 15.9% is sporting, 11.2% is retail, 10.6% is holiday accommodation, 8.3% is forestry, 6.9% is residential accommodation, 4.8% is agricultural tenancies, 4.7% is heritage, 4.7% is recreational

businesses, 4% is conservation and 2.9% is renewable energy. Figures for additional indirect income outputs and direct expenditure (excluding staff) were also collated. While these patterns may have changed since the publication of this report, it is still a useful data source which can help identify some of the economic priorities of land-based businesses in the Park.

The [Cairngorms Business Barometer 2018-19](#) highlights that business support from external organisations continued to receive a low rate and “for the first time since 2012/13, businesses recorded an overall reduction in customers and turnover”. It also noted, “there were notably fewer businesses that increased or planned to increase buildings and infrastructure investment compared to 2017/18.” And, “medium and long term confidence fell to their lowest levels since 2012/13...”. The Business Barometer should be used as a key indicator around which the CNPA can focus its priorities for action on the economy.

Tied to the point made in the opening paragraphs, it is an ongoing concern among members that the important role of sporting estates to the economy (as well as conservation and cultural heritage) of the Cairngorms has been under-valued. While we welcome the inclusion of other traditional sectors such as forestry and agriculture, country sports remain conspicuous by its absence in this draft.

Country sports provides employment and attract local people and visitors to the rural areas of the Park at varying times of the year. They will not only pay for the shooting or stalking but also boost other local business such as hotels, bed and breakfasts, restaurants and shops and they play an important role in conservation. Multi-million pound capital investment also comes to Cairngorms communities as a result of country sports. For example, the investors responsible for the Fife Arms and Gairnshiel Lodge redevelopments initially came to the area for stalking and grouse shooting.

Similarly, for snow sports, other competitive sport and the centre of excellence for mountain training at Glenmore Lodge; the CNP is the home of more Olympians per head of population than any other community in the UK. This is a point which should be better marketed to ensure recreation in the Park is less seasonal and less dependant on a few areas/facilities.

There is also continued concern among SLE members that there is no mention of quarrying and only one brief mention of renewable energy in the consultation. Renewable energy is a growing sector for many rural businesses and it is particularly important in the context of the climate emergency. Our members have also noted that the CNPA could prioritise the establishment of a network of electric vehicle charging points across the Park.

SLE members have also previously raised concerns about the length of time it takes to move applications through the planning system and on delivery. Requests from the planners regarding trees and paths, for example, were seen to be unreasonable and inconsistent. Members expressed frustration that they are trying to diversify their businesses and meet the Park's outcomes by offering facilities and attractions which could engage locals and visitors within the Park but often find the planning system to be a deterrent. We are also concerned that moves by CNPA in relation to hill tracks will have a detrimental impact on hill farming, country sports and forestry activities some of which are already economically marginal and under threat from a predicted reduction in support as a result of Brexit. This will only reduce the diverse nature of the Park's economy, making it less resilient to future challenges. Hill

tracks can be a useful means of managing access, both motorised and non-motorised, and of minimising disturbance to wildlife and vulnerable habitats.

In submissions to previous consultations SLE has also expressed concern that projected housing numbers do not meet with the needs of local estate businesses looking to grow in the area. Our members have also expressed concern that the methodology behind the Housing Needs and Demands Assessment do not take into account people not on the housing waiting list but who nonetheless want/need to live in the Park. There is a mismatch here between the projected numbers in population growth and the potential servicing needs of the expected increasing visitor numbers. The CNPA records an increase in numbers of visits to the Park from 1.3 million to 1.85 million (42% over 14 years) between 2003 and 2017. However, the CNPA only looks to accommodate an increase in population of only 7% over the period 2020 to 2030; a rate well below the rate required to keep pace with servicing visitor needs alone. Furthermore, 7% over ten years goes on way to enabling diversification of the local economy, nor does it make allowance for the predicted lower proportion of working age people.

It is not possible to meet expectations for the aims of the Park unless there is a response to either constrain visitor numbers or enable businesses and community services to grow in line with the need to service those visitors. Commuting is not an option; the tourism and land-based industries are dependent on split shift working and people being on call.

Additional data sources to those mentioned above that the CNPA could consider when developing this Economic Action Plan, include:

1. [2011 Census](#) – Data on topics such as population, ethnicity, health, housing and accommodation etc. (Almost 10 years out of date).
2. [ScotPHO Health and Wellbeing Profiles](#) – These profiles present 56 health related indicators for Scotland as a whole and 32 local authorities across Scotland. Each profile provides a rich picture of both health determinants (e.g. education, employment, housing) and health outcomes at a local level. (might not get a good economic picture, no CNPA specific data).
3. [Improvement Service](#) – Provides a range of data and analysis tools (including a community profiler, interactive mapping of Scottish Neighbourhood Statistics data), designed to improve understanding of, and help plan responses to, income and employment across Scotland's neighbourhoods.
4. [Local Government Benchmarking Framework](#) – A high-level benchmarking tool designed to support senior management teams and elected members to ask questions about key council services.
5. [NOMIS](#) – Official labour market statistics from ONS.
6. [Scottish Household Survey](#) – Primarily collects information on social justice and transport, although a wide range of other topics such as employment, training and unemployment are covered.
7. [Scottish Index of Multiple Deprivation \(SIMD\)](#) – Provides a index of deprivation based on: income; employment; housing; health education; skills and training; geographic access to services and telecommunications; and crime.
8. [Scotland's statistics](#) – Provides a wide range of economic related data mostly at a variety of different geographies. It includes figures on employees by industry,

business sites by industry, earnings, labour market indicators and a variety of benefits data.

2. Do you support these Actions to deliver the economic strategy as set out in the Cairngorms National Park Partnership Plan? Please explain why.

SLE members are concerned that CNPA is focussing too heavily on the promotion of tourism to the detriment of other economic activities. While the benefits of tourism are many and welcome, its impact needs to be managed in a sustainable way. This is becoming more difficult to achieve as tourism in the areas has increased by 23% in ten years. Long term economic sustainability and stability which benefits a local population all-year-round can only really be achieved through having a diverse economy. Examples of increased pressure from tourism are abundant to see on the NC500 route and the impacts of an economy over-reliant on one industry (oil and gas) in Aberdeen City and Shire is still being felt. It is our hope that the CNPA can learn from these examples without going through similar difficulties first.

Priority 1 – build on strengths

Living Wage; if this is something that CNPA are looking to implement internally that is a matter for them. If it is for individual businesses, this may impact on the ability of some to recruit. This could have a detrimental impact on the fragile rural economy and it is therefore important that each business should be able to consider such a policy on their own terms. It should not be mandatory, rather the CNPA should act as an enabler, signposting businesses to support and information which can help them transition to the living wage if appropriate.

Forestry challenge fund pilot; this could be welcomed, as the grant available is currently insufficient to make a meaningful difference to larger schemes. However, we consider it should be managed appropriately as we consider that trees should be planted where and when there will be a net increase in employment and economic activity over the existing land use. Where possible woodland expansion should be integrated with other land uses including farming, country sports and tourism.

Rural development frameworks; Largely welcome the idea of long-term planning for land-use, business development and housing as many estates already do this. However, any pilot needs to establish that this exercise will not become a burdensome requirement that puts undue pressure on small estates and communities lacking in resources. Additionally, this exercise must be one which delivers on the outcomes. Some of our members have indicated that something akin to this had been developed in the precursor to the CNPA but had not been acted on. SLE would welcome further involvement in this where appropriate.

Agriculture regionalised approach to future support; SLE would appreciate further clarity on this proposal. This area needs special consideration in respect of possible EU changes, the climate emergency and meeting the Park Aim (b) together with other Aims. We consider policy must be tailored to ensure that enhancing productivity, business resilience and environmental benefit are top priorities. In our paper [#Route 2050](#) we have suggested the following priorities for the rural sector:

- Enabling rural businesses to understand their carbon footprint and ways to reduce it
- Increasing access to skills training and knowledge for improving efficiency
- Access to capital and knowledge to improve productivity and resilience
- Improving the use of data by government and business to target investment.

It is important to consider broadening of the economic base and slowing outward migration as listed in Annex A, Policy 3.1 d) and f) in the priorities for action. Also, addressing the climate emergency should be given more prominence under sustainable use of the natural resources. Once again, SLE members can be key delivery partners in contributing to carbon sequestration under forestry, farming and moorland policies.

Priority 2 – supporting and attracting business

Community & Business-led housing delivery; good to see housing delivery included as part of approach for attracting business. However, SLE members are concerned with Scottish Government policy and regulation which does not incentivise property owners to refurbish and rent out existing houses to residents or build new houses to rent on land they own.

Support business; we note priorities for community-led and social enterprise models but other 'traditional' models should not be neglected. To further reinforce this point we highlight the Cairngorms Business Barometer which indicates low levels of approval for existing business support in the Park.

Priority 3 – Education, training and skills development

Circular economy and adaptation to climate change; we welcome a business-led approach to this. Investment in infrastructure in this sector should include adequate access, facilities and training for forestry, renewable energy production, processing and value adding products produced locally. This is crucial to ensuring that a diverse economy can have an appropriate and sustainable skills base required for future growth.

Priority 4 – Infrastructure and capital investment

Housing delivery; we don't object to a review of vacant and derelict land and property, stalled development sites and impacts of short term lets, but this must be carried out in a transparent and inclusive manner. We would expect the impact of short term lets in CNPA to be different to the experience in Edinburgh, for example. There is a need to establish what is meant exactly by public interest development in the context of the Park, particularly when you consider the Park has a large transient visitor population.

Most domestic accommodation rented in the Park is privately owned, however, taxation and recent legislation have combined to discourage the private rented sector from providing more domestic accommodation to rent. Also, instead of building homes which are then subsequently sold as second homes or for people to retire in the area, the Park's economy needs to diversify from tourism and changes need to be made to legislation to encourage property owners to provide more houses to rent to residents and people working locally.

In order to provide sustainability, housing delivery needs to include consideration of public transport, space for community facilities, business, ecological enhancement, learning and recreation.

Given the current focus on tourism, motor homes and camper vans need to be better welcomed and facilitated. It is our understanding that the Rural Tourism Infrastructure Fund will be opening again and we would welcome the opportunity to discuss how SLE members can help with this.

Priority 5 – Community and enterprise

Investment in community-led development; SLE welcomes work to secure this after the end of the current LEADER programme ends.

Developing an entrepreneurial culture; we welcome the inclusion of this programme of events however, this could be strengthened by directly involving HIE / Scottish Enterprise to help deliver specific support to entrepreneurs in the Park. This could be similar to the programme of action for young people also mentioned in this priority.

3. Are these delivery and monitoring arrangements appropriate for the Economic Action Plan? Please explain why.

Delivery and monitoring arrangements seem appropriate but need to be measurable, measured and acted upon. As we have demonstrated, SLE members can be important delivery partners in meeting the aims of the Economic Action Plan. We therefore hope that CNPA can adequately recognise the insight and knowledge land managers have with regards to their rural businesses which help the communities within the Park thrive.