

Introduction, Background & Summary

The Cairngorms Business Partnership (CBP) is a membership funded chamber of commerce for the Cairngorms National Park. We have almost 400 member organisations representing all sectors and geographies of the National Park. We also operate as the Destination Management Organisation for the National Park through our brands VisitCairngorms and SnowRoads.

The CBP welcomes the long and positive relationship we have with the Cairngorms National Park Authority (CNPA) and the many partnership projects we have worked on and continue to work on. Most recently SnowRoads, VisitScotland Growth Fund, VisitScotland Expo, Cairngorms Business Barometer and many more.

We recognise the many positive areas of work undertaken by the Authority to support businesses in the Cairngorms and appreciate these. Throughout this document we have focussed on where we feel there is more opportunity to work together in the collective pursuit of the national park aims. We have asked questions throughout the document both to improve our understanding of the work of the Authority and to continue and enhance the conversation about how we can collectively achieve even more.

In 2018 the CBP established an Economic Strategy subgroup which met a number of times culminating in a meeting with Gavin Miles, Head of Planning for the Cairngorms National Park Authority, on 6th September 2018. The purpose of the meeting was to input at an early stage into the Economic Strategy and a summary of that meeting was shared and agreed with the Authority.

We welcome many of the actions contained within the draft EAP including for example promotion of community-led housing delivery using the Rural Housing Fund. We believe, however, that the impact on collective delivery of the four aims of the National Park could be much greater if they were delivered in the context of an Economic Strategy with the following ambition, which was the output of the work leading up to and including the meeting on 6th September 2018:

“The primary ambition of the economic strategy of the National Park should be: To sustain and grow the population of young and working age people in the National Park (in line with the National Park Partnership Plan) and ensure the National Park is an attractive place that encourages business to invest”

In isolation we do not believe the actions laid out in the Draft EAP will deliver this ambition but could form the basis of a strategy that could move us towards its delivery.

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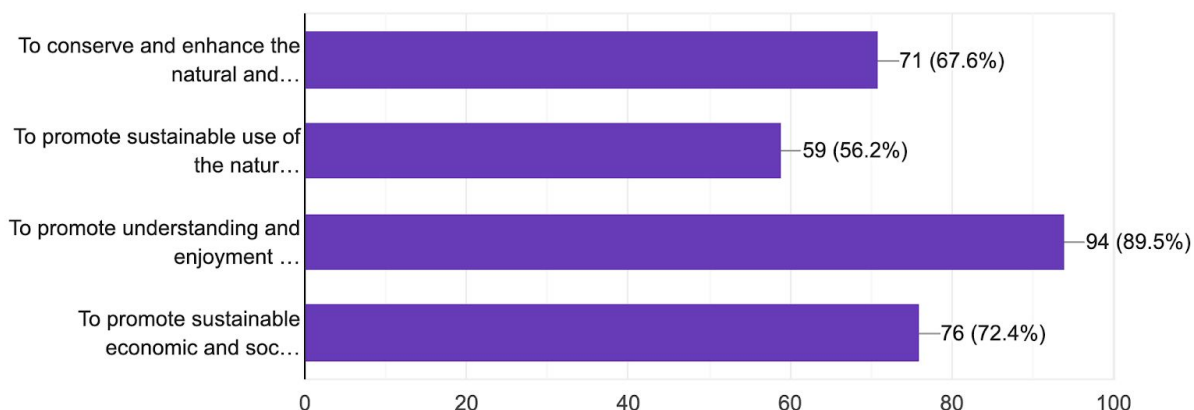
We thank the CNPA for giving us a little more time to compile our response to the draft EAP consultation. The consultation has been conducted at what is the busiest time of year for most of our members. With regards to the process that has been followed we would like to clarify the following:

- **Question 1: The CBP met with CNPA in September 2018, the output of that meeting was shared and agreed as a fair reflection. The consultation documents, which we do not believe take significant account of our input, were approved for consultation by the CNPA Board on 6th December 2018. Why was the decision taken not to run the consultation at that time when it could have benefited from both better engagement with business and informed the LDP consultation?**
- **Question 2: Given the above some of our members have specifically requested that the consultation remain open until the end of January 2020. Can this be done?**

As part of our engagement with members we asked businesses to tell us which aims (of the National Park) they felt their businesses contributed towards. The results are shown in the following chart:

The Cairngorms National Park was established with the objective of collectively pursuing four aims. The pr... you believe your business contributes.

105 responses



The above demonstrates how businesses play a significant role in the collective delivery of all four statutory aims of the National Park. We recommend that the EAP is changed so that it recognises the contribution of the local economy towards such collective delivery and explains that a strong and sustainable economy supports all four statutory aims.

Specific Feedback

Introduction, Strategic Context & Economic Strategy (P 1-8)

Throughout this section, and others, the document refers to the delivery of ‘the economic strategy which is set out in the Cairngorms National Park Partnership Plan 2017-2022’. The Partnership Plan refers to the now expired strategy and lists an economic strategy as a sub strategy on page 15. Annex A within the consultation document is not what we would describe as an economic strategy . It is therefore not clear what the economic strategy referred to is.

- **Question 3: To which strategy are the references in the draft EAP being made?**

We recommend that the EAP is developed with the CBP and other partners in a ‘bottom-up’ fashion to formulate an economic strategy and delivery plan that can be at the heart of the next statutory Park Plan.

The National Context section refers to ‘invest in infrastructure to deliver housing, improved access to services and connectivity, enabling improved sustainable and inclusive economic growth’. Whilst elements of the draft EAP will contribute towards this, we do not believe it has the tools to make significant progress towards this aim or the aims of the National Park.

This section of the draft EAP also refers to the National Parks (Scotland) Act 2000 (the Act), section 9(6). The text states that if it appears there is a conflict.... The Act states:-

“In exercising its functions a National Park authority must act with a view to accomplishing the purpose set out in subsection (1); but if, in relation to any matter, it appears to the authority that there is a conflict between the National Park aim set out in section 1(a) and other National Park aims, the authority must give greater weight to the aim set out in section 1(a).”

We would suggest the key statement is ‘if it appears to the authority’ and in this regard we would ask:-

- ***Question 4: What is the process within the CNPA for deciding 1, if there is a perceived conflict and 2, what proportion of greater weight is applied?***
- ***Question 5: Do the CNPA Board retain this power? If it is delegated to officers to whom and how is it delegated?***

- ***Question 6: What conflicts have been identified in the drafting of this plan***

We recommend that an economic strategy, alongside other strategies, would help to both decide on perceived conflict and the appropriate weighting to be applied.

We believe clarity on these issues is important to help us understand the process the CNPA applies to giving weight to four aims of the Park.

Given the complexity of the overlapping public sector boundaries highlighted on page 6 of the draft EAP, the contribution of the private sector to delivery of all four aims of the Park and the National Park Authority's statutory purpose as outlined in the Act, we believe it is essential that the Authority takes a leadership role in the development and delivery of an Economic Strategy for the National Park.

We recommend that the Authority takes on this leadership role and, considering the importance of the local economy to the delivery of all four statutory aims, that the Authority's resources, whilst limited, are so balanced to enable this.

The first aim of the National Park is *'to conserve and enhance the natural and cultural heritage of the area'*

The draft EAP rightly refers to the importance of *natural capital*; also of importance to our economy and our communities is *cultural capital*.

For example, we have a very special sporting culture that has produced the most Olympians per head of population in the UK. This is unique and implies something special about the culture of the area that needs to be protected, enhanced and promoted. The strength of this culture is a key part of what is needed to attract and retain particularly young workers to the Park.

We recommend that work is undertaken to better understand and articulate our cultural capital for the benefit of the economy and our communities and to ensure it can be conserved and enhanced.

The infographic on page 8 is dated June 2015:

- ***Question 7: Is this data to be updated and improved as part of the data gathering exercise for the next statutory Park Plan including a measure of economic value added? Will the CBP and others be consulted about what data is needed to help develop an effective economic strategy?***

Changes in Strategic Context (p9-11)

The key strategic challenge for the economy of the National Park is the forecast depopulation of young and working age people within the National Park and the significant demographic shift towards an ageing population. This prediction concerns us greatly.

The draft EAP highlights success in increasing visitor numbers by 42% since the establishment of the National Park. Whilst there has been modest population growth during this period this had not been in the working age demographic. The key challenge for the visitor economy is that growth in the working age population has not matched, and therefore enabled, effective and high quality management of growth in visitor numbers. This has led to the significant pressures we are now seeing in relation to housing, transport, lack of skilled labour etc.

In our survey of members in preparation for this response, the top priorities identified for business were as follows (in order of the greatest priority first):-

1. Affordable Housing
2. Digital Infrastructure
3. Physical Infrastructure (including visitor information centres)
4. Attracting inward investment
5. Improve Public Transport
6. Access To Skills Development
7. Higher Education Provision

All of this comes under the umbrella of our key ambition for an economic strategy stated on page 1.

Whilst we welcome many of the initiatives contained within the draft EAP, they will not be sufficient to make significant progress on the above key strategic challenges; the recommendations we have made above are intended to seek to address this.

We recognise the ability, and track record, of the CNPA in leveraging significant investment in the National Park. We would be very supportive and keen to work in partnership to leverage investment that improves some of the infrastructure challenges we face as if we are to deliver on our potential then we need the infrastructure to support this.

Within the key challenges the potential impact of a transient visitor levy has not been mentioned.

- ***Question 8: What does the Authority believe the impact of a potential transient visitor levy will be?***

We believe that such a levy could put significant additional pressure on an already fragile economy. We therefore recommend that the EAP takes a stance against such a levy being introduced within the CNP.

Themes and Actions (p12-17)

The identified themes will enable improvements and can be mapped to the key priority areas identified by businesses. We believe that these themes could be more effective if better aligned to our stated key ambition (page 1) and more clearly aligned to the priorities that would drive towards achieving this ambition.

Our key queries in relation to the themes are:-

- ***Question 9: how will success be measured against these priorities? How will we know when they have been achieved?***

Theme 1 - Building on Economic Strengths of the Park (P13)

Wages - whilst noble we believe this ambition in isolation is misguided as it does not recognise the inherent weakness and fragility within in our economy particularly in relation to retail, food and beverage and tourism. This ambition could be a measure of success of an economic strategy rather than an action within itself as if the economy is successful, wages levels should be pushed upwards.

Ski Centres - Ski centres are important to our winter visitor economy.

- ***Question 10: Who will lead on this work? Should this be broadened to include other visitor facilities and infrastructure as highlighted as a priority in our survey of members?***
- ***Question 11: Can we consider how we can build on the cultural heritage our ski areas have (see page 1)?***

At the CBP member events held to discuss the draft EAP it was noted that the document does not mention key elements of the economy that are a strength. For example, farming and renewable energy. The plan at the moment talks about building the case for a regionalised

approach... to agriculture. This could however be more ambitious, specific and measurable given the length of the EAP.

- **Question 12: Can the EAP be reconsidered to take a more holistic view of the strengths and potential opportunities within our economy, including agriculture and renewables for example?**

Theme 2 - Supporting and Attracting Business (p14)

Community and Business led housing delivery will contribute towards the needs of the National Park. The example of BSW Timber has already run into challenges with timeframes and support. We recognise the additional and careful consideration that needs to be given to any development to ensure it protects and/or enhances our natural and cultural heritage.

We recommend that promotion of work / lifestyle benefits is undertaken in conjunction with improving infrastructure. This will help businesses attract and retain staff.

An area where there could be an immediate win in this respect is if the CNPA worked proactively to deliver An Camas Mor. CBP would be happy to use our channels to promote this if the infrastructure was in place to deliver the promise. An Camas Mor seems to be the best way of achieving this in the short term.

- **Question 13: Can CNPA take a proactive and supportive role to ensure that An Camas Mor is delivered?**

Theme 3 - Education, Training and Skills Development (P14)

CBP are happy to lead on circular economy opportunities, subject to adequate resources and funding being available to support this work. We would not want to frame this as businesses 'adapting to climate change' however. We do not need to adapt to climate change we need to reverse it and businesses can best contribute to this, with public sector support, by continuing to deliver the four aims of the National Park.

Digital Training - CBP would be happy to deliver and/or facilitate the delivery of digital training. This should not be limited to the tourism sector and we would like to work with CNPA to identify a budget to achieve this (none is currently identified). At the moment this action point is not resourced and we need to make this clear and add CNPA and perhaps HIE/SE to the lead as they will need to fund this work.

Skills - As part of an effective economic strategy we should be identifying skills gaps in our economy and identifying partners to help close those gaps. We are unclear how this statement

will move us towards that however. We would suggest a piece of work is undertaken to move this forward and we would be happy to support CNPA in doing this or identifying an appropriate body to do so.

Theme 4 - Infrastructure and Capital Investment (p15)

Housing delivery is critical to the success of any economic plan or strategy. We recommend that the Authority does more to lead on delivery, for example by creating and leading task forces for key developments to help remove any barriers that may or may not be identified in the review that has been suggested in the draft EAP (which we welcome). We maintain it is unfortunate that the draft LDP was prepared prior to the draft EAP as the latter could have informed the former.

Feedback from member businesses has suggested that the Authority is excellent at providing pre planning advice and guidance. We are grateful for the Authority's assistance to our members in this way. However, once the planning application is submitted the 'planning process' kicks in and key economic development advice and support is diminished.

This challenge could stem from the fact that economic development is integrated within the planning team of the CNPA.

- ***Question 14: Could CNPA separate economic development and planning and establish procedures for 'chinese walls' within the Authority, right up to board level, so businesses can continue to receive support and guidance and not jeopardise the important planning process?***
- ***Question 15: Is it possible for CNPA to consider a process for taking a more risk based approach to planning?***
- ***Question 16: Would the CNPA consider establishing and leading 'task force' teams to deliver key developments such as An Camas Mor?***

We would suggest that the list of investments in the draft EAP is not included in the final document. Whilst positive it has some notable omissions and is not relevant to any strategy moving forward.

At the CBP events held to discuss the draft EAP it was suggested that the Authority could take a more proactive role in deciding what type of investment we want in the National Park. It was recognised that once a planning application is received it can only be reviewed and opined on in line with the statutory planning process. However, the Authority could be more proactive in

targeting the types of investment that we feel are most appropriate to achieving the aims of the National Park.

- **Question 17: Will the CNPA include this within the EAP and work with the CBP and Enterprise Agencies to establish how we can agree and target specific inward investment opportunities that would enhance the National Park and help deliver on the aims? To support this we suggest the creation of an economic strategy group.**

We recommend that through existing channels such as the CTP and a new Economic Strategy group we could look more strategically at the types of investment we want to see and work with public sector partners to target and attract those investments. The CBP would be very willing to play a full and active role in this and would be prepared to consider, with appropriate support from the Authority, chairing an economic action group.

In relation to infrastructure, the Authority could take a lead in ensuring that people can move around the whole of the National Park in an electric vehicle and this could be included as a measurable ambition within the EAP. Much of the infrastructure is probably already in place and CBP would support packaging and promoting this through our networks.

Priority Theme 5 - Community and Enterprise (p17)

We would suggest that 'developing' our entrepreneurial culture is retitled as 'enhancing' our entrepreneurial culture as innovation and entrepreneurship are an established part of our cultural heritage and economy.

Young people - as outlined on page 1, this needs to be the driving force of the strategy rather than an action.

Delivery and Monitoring (p18) & Summary

We believe there could be more measurable and specific outputs in the draft EAP and would be happy to discuss what these could be. Overall we are in agreement with and supportive of the vast majority of the actions and our comments are primarily focussed on our belief that working collectively we could achieve much more. We would offer our full support to the Authority to lead the alignment of other agencies to support a more ambitious economic strategy for the National Park.

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Question 18: What resources, outwith the Authority's statutory planning function of restricting inappropriate development, will the Authority put towards delivery of the EAP?

Question 19: What mechanisms will be in place to ensure the EAP can adapt to changing economic circumstances during its existence? We recommend an economic action group is established and believe this could help achieve this.

We hope the above comments are helpful and we would welcome the opportunity to discuss these further with the Authority. We look forward to the Authority's responses to the questions we have raised and positive engagement with the Authority as the process moves forward.