

By email: economy@cairngorms.co.uk

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Please find RSPB Scotland's response to the Cairngorms National Park Economic Action Plan 2019-2022 consultation below.

Q1. Review of change in strategic context (pp9-11).

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

We welcome that the importance of climate change and biodiversity loss have been highlighted at the start of this section and it is noted these have implications for land use, housing, transport and tourism. However, the plan could go further in providing detail on how such implications (and ensuing economic trends) will be addressed in the park. For example, by providing charging points for electric cars, investment in cycle routes and infrastructure and greening measures and micro-renewables in housing and other developments.

RSPB Scotland recognises that the CNPA is delivering a lot of climate action through peatland restoration but could do more across other sectors and has decarbonisation responsibilities as a public body:

<https://www.gov.scot/policies/climate-change/decarbonisation-in-the-public-sector/>

We welcome the statement '*we need to ensure that growth in the park economy is sustainable and helps to meet the target of net zero emissions and biodiversity targets*'.

Q2. Priority themes and actions (pp12-17)

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

Priority Theme 1 Building on economic strengths of the Park

The principle aim of the Park is '*To conserve and enhance the natural and cultural heritage of the area*'. To meet this aim (and the statement above) the park must ensure that the Cairngorm Mountain masterplan and any developments it approves have no adverse impacts on international, and nationally protected wildlife sites, supporting important breeding birds and habitats.

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The use of a biodiversity net gain approach could be investigated to encourage wildlife tourism and help restore the natural capital of the Park. Although this may be delivered for individual developments through the planning system; research could be carried out, or supplementary planning produced to enable delivery.

Priority Theme 2 - Supporting and attracting business

Providing support to businesses which seek to address climate change and biodiversity loss should be included here. This is different to 'adapting to climate change' as proposed in Priority Theme 3.

Priority Theme 3 – Education Training and Skills Development

There is an opportunity to train people in how they can reduce the carbon footprint of their business and 'green' their work. Many people come to the Park for its natural beauty and wildlife. If businesses can address the increasing concern and awareness of the public in terms of climate change and biodiversity loss (highlighted in the strategic context section), then that could be a real benefit for their trade and contribute to the Park's overall strategy.

Priority Theme 4 - Infrastructure and Capital Investment

We welcome the inclusion of the Tomintoul and Glenlivet Landscape Partnership and Peatland action in this section. Cairngorms Connect should also be included in the list of 'Capital Investment Priorities' due to the economic value of the project, provision of employment and natural capital.

RSPB Scotland continues to have concerns over aspects of the A9 dualling, particularly the Crubenmore to Kincaig section. A robust set of detailed mitigation measures and monitoring will be required to ensure that An Camas Mòr does not have an adverse effect on internationally designated sites for capercaillie thus ensuring that biodiversity targets are met and priorities delivered in the Cairngorms Nature Action Plan.

Priority Theme 5 – Community and Enterprise

We would encourage entrepreneurial training and education for young people to address the challenges of climate change and biodiversity loss. It is key that future residents and businesses in the park have the skills and knowledge to address these challenges in business models.

Q3. Delivery and monitoring (p18).

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

The delivery and monitoring could contain quantitative targets. We welcome enhanced communications around natural capital.