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Dear Matthew

Cairngorms National Park Authority response to the Scottish Biodiversity Strategy Consultation

Using your own knowledge and the evidence presented, to what extent do you agree that there is a nature crisis in Scotland?

1. The Park Authority agrees the evidence for biodiversity loss globally and in Scotland is unequivocal. This is directly relevant to the Cairngorms National Park as we estimate there are around 90,000 ha of impacted peatland and 57,000 ha of this has experienced some form of erosion. 20 % of all designated features are in unfavourable condition, with 29.4 % of upland features in unfavourable condition. Species decline is evident too e.g. Scottish wildcat, a once widespread species is now on the brink of extinction with the wild population being classified as functionally extinct. Caledonian pinewood specialist twin flower has declined by 44% nationally.
2. The Cairngorms National Park is one of the key places to tackle the nature crisis and the recently approved National Park Partnership Plan has this as one of its core objectives.

What do you see as the key challenges and opportunities of tackling both the climate and biodiversity crises at the same time?

3. The Park Authority agrees the twin crises are interlinked and reinforcing, building the urgency and profile of the challenges faced by all land management in Scotland. They also provide opportunity to bring in new delivery mechanisms and partners and potentially finance to deliver on the scale required. However, we need to ensure good information and evidence informs decisions and that addressing one crisis does not take precedence over the other. For example, ensuring woodland creation happens in the most suitable location to maximise benefits for biodiversity in terms of connectivity, habitat heterogeneity and quality alongside storing and sequestering carbon.
4. The Park Authority welcomes the direction in the SBS and highlighted activities to address issues that deliver for both carbon storage and sequestration and biodiversity loss and nature recovery e.g. herbivore impact on woodland regeneration and peatland restoration.

5. The Park Authority recognises and support the need for more evidence to inform rapidly evolving understandings of the carbon potential of different land use types, however this needs to be considered alongside the need to move at scale and speed.
6. There is clear opportunity to promote and support nature based solutions, develop new rural payment schemes that deliver for nature and build climate resilience, demonstrate and promote best practice and provide support for land owners and managers.

Vision

Is the draft vision clear enough? Is the draft vision ambitious enough?

7. Overall, the Park Authority welcomes the vision and level of ambition of the SBS. There is clear alignment with the new National Park Partnership Plan (NPPP) and the Cairngorms Nature Action Plan (CNAP). The Park Authority consider the NPPP and the CNAP to be the direct delivery mechanism to deliver this SBS vision.
8. Restoring ecosystem health and increasing species richness, diversity and abundance is core to achieving the 2045 vision of restored and regenerated biodiversity. Working on a landscape scale achieves greater outcomes for biodiversity and maximises opportunities for restoration, regeneration and building of resilience. The park Authority has been working at this scale for some time and continue to do so in the new NPPP.
9. The Park Authority fully appreciates the importance and benefits of involving a wide range of land managers, communities, visitors and organisations in protecting and restoring Scotland's biodiversity, fully integrating nature recovery into the wider landscape and society as a whole, and welcome the direct recognition of this in the Vision.
10. The Park Authority welcomes the ambition set out in the vision, acknowledging that more detail will be necessary in subsequent documents to clarify expectations. The infographics provide a good visual representation of what the vision looks like and we suggest greater clarity is required in some instances, particularly where there is reference to 'substantially restored' habitats and there may be a lack of common understanding around what that means in practice.

Outcomes Framework

Do the 2045 outcomes adequately capture the change we need to see? Are the 2030 milestones ambitious enough?

11. The detail contained within the forthcoming delivery plans will be critical to the successful delivery of the SBS outcomes and milestones. We look forward to being involved in the development and implementation of the SBS delivery plans where measurable outcomes and actions will be required to ensure the 2045 outcomes and 2030 milestones are realised.
12. The objectives and targets in the recently approved National Park Partnership Plan strongly align with and echo the outcomes framework in the SBS and we are therefore very supportive of the ambition and direction; notably:
 - a) SBS outcomes and milestones for farmland practices increasing biodiversity, storing carbon and protecting soils, while sustaining high quality food production are directly

reflected in the NPPP objective to ‘Work with farms in the National Park to reduce their carbon footprint, conserve soil carbon, encourage sustainable production and deliver increased biodiversity on in-by-land’. The Park Authority welcomes the recognition that a reformed agricultural subsidy scheme is central to the delivery of this outcome.

- b) SBS outcomes and milestones that enable natural regeneration of woodlands, greater diversity of woodland species and woodland age structure and increased woodland cover and connectivity are directly reflected in the NPPP objective to ‘Increase the amount of woodland in the National Park to support larger, more natural woodlands, expanding in places up to a natural treeline, providing connections across river catchments and around the central core of the mountains’.
- c) The milestone to reduce the number of deer and their impacts alongside other herbivore impacts to enable peatland restoration, natural regeneration of woodlands and increased structural diversity in our uplands is directly reflected in the NPPP objective to ‘Reduce the negative impacts of red deer and other herbivores across the National Park to enable woodlands to expand, heather loss to be reversed, peatlands to recover and wider biodiversity and landscape enhancements to take place’.
- d) Proposed freshwater outcomes and milestones for restoring catchments, improving ecological status and increasing the extent, condition and connectivity of freshwater systems are delivered through the NPPP objective to ‘Restore and connect rivers to thriving wetlands and floodplains as part of a wider restoration of the National Park’s freshwater systems, helping mitigate the impacts of climate change’.
- e) Proposed outcomes for delivering diverse nature networks, embedded in wider land use, that increase the health and resilience of ecosystems are directly reflected in the NPPP objective to ‘Connect habitats and ecosystems across all different types of land use in the National Park to create an ecological network, which will bring wider landscape, biodiversity and people benefits’.

Are there any key elements missing?

- 13. We welcome a landscape scale restoration approach, however the Park Authority feels there needs to be recognition and mechanism for targeted action for species. The Park Authority feels that whilst the recovery of habitats and ecosystems at a landscape scale is the long-term sustainable solution, there are some species that require targeted individual focus to get them back on a sustainable footing. We recommend that the Scottish Biodiversity Strategy overtly recognises this need for species conservation in the short to medium term.
- 14. There should be more recognition of protected sites, specifically the role they can play as nodes in an ecological network and the relationship between designations and ecosystem restoration, resilience and adaptability to climate change impacts. This should not however substitute or detract from the important role and recognised need for nature recovery to be fully integrated into wider land management, rather it should highlight how protected sites can add value.

What evidence and information should we use to assess whether we have delivered the Vision?

15. One of the challenges will be to further define the end points of ‘substantially restore’ and/or define the metrics which would measure progress towards the kind of change we want to see. Current metrics and data collection may be focussed on protecting existing condition, habitats and species. The vision is for the kind of change we need to see in light of the twin crises and new metrics will be needed to assess progress towards functioning habitats with assemblages that may not currently exist. A focus on habitat restoration and ecosystem functionality may mean less of a focus on monitoring individual species.
16. Existing data sets and monitoring frameworks (e.g. Water Framework Directive, WeBS, Wildlife Estates Scotland) will be a good starting point to monitor change from. We support a critical examination of what the indicators might be for the landscapes and assemblages we want to see in a substantially restored, functioning and resilient ecosystem, whilst recognising that it is important that current habitat and species data is monitored to fully understand how land management change is affecting the distribution and abundance of some species.
17. The Cairngorms Nature Index is an excellent tool to provide evidence. The CNI has been developed closely with NatureScot input and we are keen for NatureScot and Scottish Government to see the National Park as leading the way in devising a methodology to examine ecosystem health and functionality. The CNI will help define what ‘restore and regenerate’ looks like in the National Park, measure progress and provide evidence to show biodiversity benefits. This will be hugely important as there is a greater shift towards funding and other interventions being based on evidence of what works and on ecosystem restoration outcomes.

Conditions for success

Has the proposal captured the key enabling factors which are essential in order for the SBS strategy to be successful?

18. The Park Authority is very well placed, and a good example of how to create the right conditions for success. There are already a number of action plans and strategies, advisory groups, discussion fora and lines of communication with stakeholders that support strong leadership, governance and inclusive engagement.
19. Objectives in the NPPP demonstrate CNPA, and partners’ commitment to creating the right conditions for success that deliver multiple ecological and socio-economic benefits; notably objectives to:
 - a) Use private green investment in the National Park to fund nature’s recovery and share the benefits between communities, landowners, workers and wider society.
 - b) Increase skills and training opportunities for people in the National Park to meet business needs and ensure opportunities created by the growth in green jobs can be filled by residents and under-represented groups.
 - c) Improve the mental and physical health and wellbeing of the people of the National Park through greater connection with nature and the outdoors.
 - d) Increase the number of volunteer days spent caring for the National Park, taking an inclusive approach to volunteering recruitment.

- e) Support and deliver opportunities for outdoor learning, linked to the special qualities of the National Park.
 - f) Welcome visitors and provide a high-quality experience while managing their impacts through providing better infrastructure and high-quality ranger services
20. We particularly welcome the recognition of public engagement and communications as a proposed outcome, including the inclusion of a focus on young people and outdoor learning, citizen science, the engagement of local communities of place and interest, volunteering and behavioural change. The Cairngorms Nature Action Plan includes 'Involving People' as a strategic objective and we have experience to offer from our Heritage Horizons and Cairngorms Nature programmes.

Yours sincerely



ANDY FORD
Director of Nature & Climate Change