

NORTH EAST MOUNTAIN TRUST

*A Quality Future
for Mountaineers
and Hill-Walkers*



PO Box 40
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30th June 2006

National Park Plan Consultation
The Cairngorms National Park Authority
14 The Square
Grantown-on-Spey
Morayshire
PH26 3HG

Dear Sirs,

Re: CNP – Draft Plan for the Future Consultation

I write on behalf of the North East Mountain Trust to comment on the above documents. The North East Mountain Trust draws members from recreational users concerned about the future of the Scottish hills and coast. Through individual and affiliate membership we represent over 16,500 people. We are pleased to be able to comment on the next stage in the life of a mechanism that we hope will protect and enhance the special area that is on our doorstep.

A sub group of our General Council have considered the documents in detail and our comments are attached. We would be pleased to continue to discuss this and other proposals with the Authority's staff.

Yours Faithfully,

Donald Thomas
On behalf of General Council

North East Mountain Trust Comments on CNPA Consultation Plans

General

The documents are well laid out and written in good simple language. In terms of trying to engage the wider public, we think that they do a good job.

We support the idea of the two documents; one setting out a visionary future and the other setting out some realistic short-term achievable goals. They contain a lot of good material and common sense. Credibility will come from addressing park wide issues and avoiding treading on local authority toes.

In general, we have the following comments:-

- More prominence needs to be given to the concept of wild land. This is key to the park as a whole and we suggest should provide a backbone to the documents.
- More prominence also needs to be given to the concept of zoning. It is clear that this has been considered and rejected. However, we strongly suggest that the CNPA rethinks this position. We understand the argument that a rigid zoning system might have undesirable consequences in specific cases. However, we think that finding a way around some of these inconsistencies is likelier to be easier than dealing with an intransigent landowner who immediately appeals a decision to a remote inspector.

If the authority plans to base an informal zone around the 400m contour, then, we think that this should be given greater prominence in both documents. The obvious disadvantage of basing a strategy around a contour is that there maybe lower areas with particular ecologies or landscapes features that also need to be protected.

- The documents need to give more profile to the role that the CNPA can provide in terms of leadership. There is a real opportunity here to provide some leadership. Consultation and partnership always work better where there is clear leadership and the CNPA is well positioned to provide this. Most issues will be taken forward by consultation, but some issues such as deer management or hill tracks will not be resolved by partnership alone. We believe that the documents need to show that there are issues where the authority will take a strong stance. At times, good leadership requires a firmness of purpose.

A good example of where leadership could be shown in the short term is in the whole question of agricultural subsidies. As you know, these are all changing and it appears that the time is right to make a bold bid for a regime that would benefit the park, in terms of both the farmers within its boundaries and the ecology and landscapes enjoyed by everybody. The juxtaposition of farmed land and wild land is a key feature of the Cairngorms area. Most people would want this to continue.

- Too much prominence is given to laudable national issues. As issues themselves, we totally support the stance taken in the plans. However, we are not convinced that so much profile should be given to these issues. We believe that they need to be set in the context of presumably short park resources. The park will not succeed by championing an issue that may make better use of resources in a large city, such as Edinburgh or Glasgow. It will succeed by building on the specific aspects that are distinctive to the Cairngorms. The documents need to be clearer about this. Issues such as litter

or water quality are vitally important to the park itself. However, sustainable housing design might make more of an impact nationally in a more populated area.

- Although clearly identified as a priority, we would like to see more profile given to the idea of contiguous areas, allowing species to migrate across the park. Ideally, this would allow different species to flourish, but, at worst, would allow them to better cope with changes, such as climate change.
- Finally, much of the language used in the plans considers the park as a self-contained system. Aspects such as human population dynamics are discussed in a park context. However, the human population living within the park is too small to be considered self-contained and must be considered in terms of a much wider area. This also applies to many other issues such as affordable housing, waste management, etc.

Looking to 2030

- There are a lot of strategic objectives, possibly too many. Trying to find the right balance between all these objectives will either be very difficult or very subjective. As noted above, some form of zoning could be very helpful in this context.
- We suggest that this document gives more profile to understanding the dynamics of the ongoing changes, where possible using existing information. Understanding the rates of change could determine whether remedial action needs to be taken quickly or there is time for a more measured approach. This would apply to all measurable changes, including social changes, and not just ecological changes.
- 3 – We agree with the decision to make climate change a subset of responding to external changes. Yes. It's very, very important but the authority cannot take on world hunger. It's also good to not spend too much space agonising over what exactly the effects will be. The point is indeed that management has to be flexible and pro-active as changes develop.
- 3 - The document discusses separate zones and concludes that they would weaken the desired integrated approach. We think that this approach will inevitably lead to conflict as different people will have different ideas about what combination of objectives are most important in any given area. Zoning would cut out some of this disagreement.
- 5 – This would be a good place to show some firmness of purpose as referred to above.. It is unrealistic to expect that issues such as deer management or the control of the ongoing development of hill tracks can be resolved by consensus alone. Developments in existing villages are another example. The authority needs to show that, if pushed far enough, it will take difficult decisions and will act.
- 5.2.1 – “New tracks, paths, roads, etc. should not detract from the quiet enjoyment of the park” Is this strong enough? We think that, other than in very specific circumstances, there should be no new tracks, etc.
- 5.2.2 – This section refers to a landscape-scale approach. Doesn't this argue in favour of some form of zoning?

- 5.2.2 – Are additional controls needed here? For example, what about the introduction of 10,000 French, red-legged partridges on the Invercauld estate?
- 5.3 – This refers to sustainable use of natural resources. This is something that we strongly support. However, in many, if not most, cases these resources will come from outside the park. Thus, scarce park funds will be being used to support a national or global cause, relevant to everywhere, not just the park. We know that this is referred to in the park Aims. Is this the right use of scarce park funds?
- 5.4.1 – This needs to specifically acknowledge that the whole agricultural subsidies system is currently being revised. This is acknowledged in the Priorities document but is central to this whole section.
- 5.4.3 - We agree that shooting is an important source of revenue for people living in the park and accept that some moorlands need to be managed accordingly. However, the document should be clear that developments for shooting purposes should only be encouraged if there are no, or negligible, environmental disadvantages.
- 6.4 – Sustainable tourism. Yes, an important source of employment, but see comment below in 7 re the potential downsides.
- 6.6 – Sustainable design of housing – The point made for 5.3 is relevant here as well
- 6.7 – Support research into renewable energies in the park. Again, we would question whether this is the right use of their funds.
- 6.8 - Litter is a park issue but the rest of the section on waste management seems to us to be another example of our theme above on laudable objectives but maybe not the right use of scarce funds.
- 7 – Yes. This is very important. If the Authority doesn't inform and encourage responsible enjoyment of the park, it will never get the necessary level of public support. However, we think that this section also needs to address the need to have some controls here. There are many examples both nationally and globally of over-enthusiastic tourism development destroying the very qualities that people value in the area. There should be one or two strategic objectives that address how the authority will monitor and guard against over-development, in a wider context than simply recommending refusal of planning permission.
- 8.1 - Yes. We do agree that, in general, the only way forward is via a partnership approach.
- 9 - Indicators are very important and we would like to see the final list before commenting. However, it looks as though there might be a lot of indicators. Is it not possible to reduce the number of indicators addressed? If there are too many, vested interests will always be able to use a selection to prove their point. Alternatively, maybe the indicators could be ranked in importance?

Priorities for Action 2007 –2012

The priorities set out here are clearly based on the visionary plan. They are possibly rather research and data collection oriented. There might be rather little tangible progress to point to in five years time.

Does this section need to address issues such as bothies and the increasing amount of camping in areas such as Derry Lodge? Other rather specific issues could include

mountain bike tracks and canoeing. We think that these issues will require some form of action in the next five years.

- 4.2.1 – Exactly how are the CNPA going to enhance the condition of designated sites? What are they actually going to do?
- 4.2.2 - This needs to be toughened up. Existing experience shows clearly that successful deer management will need more than collaboration. What will happen if, say, an estate, consistently fails to shoot agreed target numbers? We agree that, hopefully, teeth will never need to be used. However, we think that some teeth will be necessary here.
- 4.2.4 – “Encouraging people to habitually exercise in the park” – see above on use of funds for laudable objectives
- 4.2.5 – Will amendments, etc. be sufficient to deter second/holiday homes? We can’t comment because we don’t know what they are proposing.
- 4.2.5 - Sustainable design guide – as above re use of funds