

LINK Consultation Response

Cairngorms National Park Partnership Plan 2022-2027.

Draft for public consultation

16 December 2021



Scottish
Environment
LINK

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

Response

Scottish Environment LINK is pleased to respond to the consultation for the Cairngorms National Park Partnership Plan. Many of our members have responded directly. This response draws together key priorities for our members but does not include the detailed areas of work that individual members work on and have commented upon.

There is much that we welcome and endorse in this draft plan. We welcome the recognition of the interconnectedness of various policy areas and the wider context within which this plan sits, including the climate emergency, biodiversity crisis and the sustainable development goals. We are pleased to see the national park's commitment to playing its part in transforming the way our land is used to meet these environmental challenges and how improving the health and wellbeing of both residents and visitors is a priority.

We also welcome the leadership of the national park in demonstrating how Scotland as a whole can adapt to the nature and climate challenges and act to mitigate the impacts of the ongoing climate crisis and biodiversity loss in Scotland. In addition, the park has a role in showing best practice in the management of outdoor recreation and introducing measures to manage visitor pressures in popular areas which can be exemplars to learn from elsewhere in Scotland, especially following a time when larger numbers than normal have been visiting the outdoors due to the Covid pandemic.

Therefore, while we are very supportive of this park plan in principle, we would urge the park authority to consider whether there are opportunities to be more ambitious in the targets to increase the speed at which the transformation required is achieved, particularly in relation to the response to biodiversity loss and climate change.

We have commented below on those issues which are of most interest to our members, so some questions are not answered.

Overall

1. To what extent do you agree or disagree that these are the right objectives and targets for the National Park?

Strongly agree

2. Why do you say that?



We support and endorse the general direction of the plan and the priorities identified. There is a very high value in agreeing and adopting a shared vision on the priorities for the Cairngorms National Park. Agreeing and working towards a collective and ambitious vision that can deliver the necessary progressive action towards the nature and climate emergencies is an appropriate approach and establishes CNPA as a leader in delivering effective action and demonstrating how progress can be made. We would encourage CNPA to push for ambition. In the context of the current nature and climate emergency, not only do we in Scotland, and the rest of the world, need to see immediate and effective action to halt temperature rises and halt the loss of biodiversity, there is the potential in such positive action for sustainable and high quality, rewarding jobs and building sustainable communities. This provides the mandate for a change in direction and increasing the speed of that change.

Nature

A1 – Net zero by 2045.

We support this objective, but given the urgency of the climate crisis, we would hope that the national park could reach this target well before 2045. There is significant potential for carbon sequestration within the park compared to many other parts of Scotland, through peatland restoration and native woodland expansion, for example. The commitment to annual reporting is welcome and we suggest that this process is used to continually reassess the overall objective with a view to setting an earlier target date and becoming carbon negative before 2045 and allowing iterative targets assessment and definition.

A2 – increase the amount of woodland cover

We support the objective of woodland expansion within the park, especially the commitment that the majority of this expansion will be natural regeneration of native woodland through reduction of deer numbers and without the use of planting and fencing. We believe this is the best way of creating resilient woodland with all the benefits to ecosystem services that we need in terms of carbon sequestration and biodiversity and enhancing the landscapes within the park.

The current Scotland's Forest Strategy (2019-2029) aims to 'increase forest and woodland cover to 21% of the total area of Scotland by 20323. The park plan is aiming for 23% by 2045. We recommend that there is a commitment to review the percentage in 2026 and increase it to be more ambitious. There is room to avoid planting on important open ground habitats and we recommend there is a commitment to accommodate a network of stepping stone woodlands alongside woodland expansion targets.

It would be helpful to underline the importance of woodland restoration. The need to improve management of existing woodlands to benefit biodiversity and carbon should also be included in this objective and funds from Heritage Horizons could help with maintenance/ongoing management not currently covered by forestry grant schemes.

A3 – Peatland restoration

We strongly support this objective and would urge the national park to seek to increase its target area for restoration, given that 15% of Scotland's peatlands are located within the park.

Whilst recognising the target is a minimum, with approximately 90,000 Ha of degraded peat in the Park, the target would ideally be more ambitious. The action to restore a minimum of 6,500 within 5 years is only a modest increase on the 5,000ha target in the previous park plan (2017-2022) and we would suggest this target should be more ambitious.



The carbon baseline and annual reporting in Objective A1, should highlight the contribution that peatland restoration can make to the park's pathway to net zero and enable a higher target to be set for 2027 and 2045. This should also be used to secure increased government funding to deliver Scotland's targets and to secure private finance.

We would also point out that any new tracks created for the purposes of peatland restoration should require planning permission and be restored afterwards, to ensure the park's policy (set out under Policy A4) of an assumption against new hilltracks is not inadvertently undermined.

A4 – Deer management

We support this objective and the reduction in deer density across the national park. It should be explicitly stated that deer management helps tackle climate and nature emergencies rather than delivering 'biodiversity enhancements'. High deer numbers are impacting on the delivery, and cost, of other plan objectives including woodland expansion, regeneration, and peatland restoration. We are concerned that the target of 5-8 deer per sq km by 2030 is not ambitious enough. There is now a wealth of experience within the Park, from private, public and NGO landowners, that deer numbers need to be reduced far below this target in order to bring grazing and browsing pressures low enough for woodlands to regenerate. The urgency of the climate and biodiversity crises suggest that this target should be reduced and we believe a number of 2-3 deer per sq km should be the target.

A5 – Reduce intensity of game bird management

We support this objective and would like to see the licensing of grouse moors as a first step in reducing many of the negative environmental impacts of this activity. We welcome the inclusion of released gamebirds as well as grouse moor management: we have concerns at the current unregulated nature of game bird releases within the national park. Furthermore, we would like to see a commitment to introducing regulation by the national park to control these releases. An urgent first step would be to 'establish baseline numbers of gamebirds released'.

A6 – Muirburn

We strongly agree that muirburn should be banned on deep peat, and we recommend aligning the definition of deep peat with recent research and the NatureScot review of the 50cm criteria in 2022. We recommend that no muirburn is carried out on peatland soils over 30cm in depth. Ending burning on upland peat (where peat depth >30cm) is supported by a wide range of environmental NGOs and other interests and is consistent with the action required to tackle the climate and nature emergencies and deliver Scottish Government commitments to restore damaged peatlands.

We acknowledge the park's policy to regulate muirburn through licensing on shallower peat soils, but all muirburn should require licensing, including burning for agricultural purposes. This should be clearly included in the NP Plan.

A7 - Farming

We support this objective which will bring benefits to farmland habitats within the national park, which are very important not only for carbon and biodiversity but also as a setting for outdoor recreation.

We recommend that the Regional Land Use Partnership brings together stakeholders to determine geographical priorities for delivering carbon and biodiversity aims. We recommend that soil testing and nitrogen balance sheets are included in nature and carbon farm plans.



The Regional Land Use Framework should include maps of carbon rich soils, priority species, high nature value farming areas, land management, existing initiatives etc. in order that measures are targeted, and biodiversity gains are not replaced by carbon reduction and loss of habitats upon which declining species depend.

LINK member organisations should be included as partners on nature friendly farming projects, many of whom have delivered success in such projects over the years. It is key that the Heritage Horizons project 'Cairngorms Future Farming' works with existing partners and initiatives to avoid approaching landowners with competing objectives. The Regional Land Use Partnership should facilitate this.

A8 – Rural payments

We support this objective and the development of rural land use partnerships as a means of delivery. Rural publicly funded payments should deliver public goods including biodiversity restoration, climate mitigation and improved access via paths and other infrastructure for outdoor recreation. Any influence the national park can have in this regard on the design of future rural payments schemes would be welcomed.

A9 – River restoration

We support this objective.

A10 – Ecological networks

Scottish Environment LINK members have long supported the call for an ecological network to be created across Scotland. Therefore, we are pleased to see this ambition within the national park and hope that those local authorities surrounding the park will be involved in helping to extend the network beyond the boundary.

LINK and our members are calling on Scottish Government to include a Scottish Nature Network as a national development in the National Planning Framework 4 and for nature networks to be delivered through spatial plans such as Local Development Plans, Regional Spatial Strategies and Regional Land Use Frameworks.

The concept of 'net biodiversity gain' in developments could be helpful in delivering this objective. Policy A5 – 6 states: 'Supporting off-site mitigation from development that contributes to ecological networks': 'net biodiversity gain' should be added to this policy as a further mechanism to deliver nature networks.

A11 - Ecosystem restoration

We support this objective. However, an earlier draft of the plan circulated to partners stated 'primarily' for ecosystem restoration, we would strongly recommend that this word is added back in as it means the aim and desired outcome of land management is more clearly defined and easily measured and helps deliver the primary aim of the National Park.

A12 - Nature index

We welcome this objective and the investment CNPA has made over the last 18 months into development of the Cairngorms Nature Index with partners, including LINK members. This is the basis of an ecosystem-based approach and will be used as a basis to monitor progress of the Cairngorms Nature Action Plan, Park Partnership Plan and Regional Land Use Framework. This is a very good example of CNPA taking the lead and demonstrating good practice.

A13 – Designated sites



We support this objective. We recognise that the picture for designated sites in the CNP is complex: vast areas are designated (46% of the CNP is SPA or SAC) with 81% of features in favourable condition. Yet other sites in the National Park that are of outstanding importance for natural heritage and include biodiversity hotspots, have no protection of any sort. The Park Plan should help ensure the value of these exceptional sites is better secured.

The Plan should introduce measures to recognise sites of particularly high natural heritage value, and identify opportunities to establish appropriate land management incentives, and other means, to better secure their future.

A14 Protected species

We welcome this objective. We also support the action to apply Scottish Government Policy to facilitate species re-introduction.

Whilst we support the action to 'reduce wildlife crime' this appears to be a target and should be broken down into clearer action. We support the establishment of a CNPA led partnership raptor project, increasing monitoring, on the ground presence and intelligence sharing as well as landowner liaison. Reducing wildlife crime has been a commitment in previous park plans and Cairngorms Nature Action Plans and targeted staff resource is required from CNPA to address this.

A15 – Private green investment

We welcome this objective. The Scottish Government has committed to invest at least £500m in the natural economy over the course of this parliament, but ongoing work in LINK with our members clearly indicates that more than £500m is needed annually in Scotland to deliver priority actions for nature alone. Public, private and third sector investment will be needed to close this funding gap and we welcome the fact that CNPA is looking to enable and encourage increased private sector investment in nature. The Global Finance Institute estimates that Scotland needs to spend a minimum £1.5bn a year above current government commitments to meet its nature related outcomes.

While we support the aims of this objective, we would suggest that the national park needs to act with urgency to ensure this emerging market is used to bring public benefits, and potentially creates a model for other parts of Scotland. We are concerned that currently green finance is skewed towards tree planting of a limited number of species and there is a need to ensure that a large amount of green finance does not drive land management that is not appropriate in all locations. There is a need to steer green finance towards a range of carbon and biodiversity projects that also demonstrate community benefit. There is a need to ensure that any private investment is targeted in a way which ensures public benefits are delivered and does not lead to higher land prices or the exclusion of communities from decisions about the way land is owned and managed.

A16 – Nature based solutions

We support this objective. Nature based solutions must clearly deliver for nature and climate: there is a clear need to ensure that such solutions have positive impacts for biodiversity and do not degenerate into any form of green washing. This is clearly a concern for the whole of Scotland but the CNPA is in a strong position to demonstrate the value of nature based solutions for nature, climate and local communities.

A17 – Involvement of people in decision-making

We support this objective and its aims. It reflects the aims of our strategy to 2030 and those of LINK members.

Given that this is a national park, we would make the case for involving both local communities of place and the wider communities of interest. However, we are not sure that the current target indicator, which relates to



surveys of the public, is going to demonstrate the level of engagement in how decisions are made within the park. The related objective B7 clearly shows how local residents can be more effectively engaged, but we would suggest the national park works with partners to engage different interests in aspects of the park's management.

People

B3 – Wellbeing economy

We support this objective. With regard to the outdoor sector, we believe that there is potential for extending the season for visits to the national park beyond the busiest summer months. This would help to secure employment beyond seasonal jobs.

B11 – Improving mental and physical health

We support this objective. Any actions that are taken within the national park with regard to the role of Heritage Horizons should be shared for others to learn from, especially in rural areas outwith the park.

B12 – Diversity of visitors

We support this objective. LINK's member organisations are also working hard to be more diverse and inclusive in their memberships and activities and we would be pleased to work with the national park on delivering this agenda.

B13 - Volunteering

We strongly support this objective and encourage more people to get involved in understanding more about the national park, whether as volunteer rangers or participants on schemes like the John Muir Award or the Ramblers Out There Award.

Place

C1 – Visits to the park

We understand the concerns regarding high numbers of visitors at peak times and the pressures this brings on communities and infrastructure. Increasing negative impacts on biodiversity (in some areas) should also be referenced in the 'why are we proposing this objective?' section. However, while we support the aims within this objective to encourage longer stays and a longer visitor season, there is a potential role for the park, which is better resourced to deal with visitors than most local authorities, to trial measures to manage demand in honeypot areas which can then be used by other authorities and land managers, adapted for their own specific contexts.

C2 – Exemplar of sustainable tourism and management of protected areas

We strongly support this objective. We recognise that it is a difficult balance to protect wildlife and habitats while also supporting people to enjoy their access rights responsibly.

C3 – Travelling around the park



We support this objective. There are many examples from mountain areas in Europe where public transport is used extensively by visitors to travel around the area and the national park can learn from this international experience.

C4 – Improve path networks

We support this objective. LINK members have, for a long time, called for the national park to become an exemplar for active travel in rural areas as this presents particular challenges for choosing where to invest in segregated paths when population levels are low and spread out.

C5 – Visitor infrastructure

We support this objective. We would also point out that, along with campervan facilities, we believe there is also a need for low cost camping options within the park, including pop up campsites for busy weekends during the peak season with minimal facilities. Camping away from formal sites is a lawful activity but can cause cumulative impacts on the environment in popular places.

C6 – Promoting path networks

We recognise that the majority of visitors to the park will use paths for their activities and it is important that these are well maintained. We also understand that using path networks helps both to reduce disturbance on wildlife and also helps land managers to manage their land, given that it is easier to anticipate where people are likely to be. However, we would caution that any signage or other information needs to be very carefully worded so that the message is about responsibilities, and any reasonable requests to stick to paths are time limited and justified. It is important not to give the impression that people must stick to paths at all times, which is not in accordance with the Scottish Outdoor Access Code.

C7 – Cultural heritage

We support this objective. Understanding the cultural heritage of the park is hugely important to the enjoyment of those who live and visit the park.

C8 – Housing

Managing housing growth and implementing an affordable / social housing model is key for sustainable communities and meeting biodiversity targets. Balancing the location of housing against nature needs would be best managed through better data and planning procedures. Nature networks and state of nature measures will be key to that decision making. NPF4 will be key and LINK and our members are responding to the current consultation.

C10 – Community management of land

We support this objective. We believe that in general it is easier to deliver projects that provide public goods, such as new path networks, when the land is owned or managed by the community, rather than a private landowner.

Technical questions

2. What are the key issues that you want the Regional Land Use Framework to focus on in the Cairngorms National Park?



The key issues for the Cairngorms RLUF are the critical role land (its use and management) must play in tackling both climate change and biodiversity loss as well as other environmental issues e.g., water quality. The RLUF should give funders, communities and land managers as clear a sense as possible of land use priorities and help to target funding and action in broad terms. Adopting an ecosystem approach, following the example of the Scottish Borders Regional Land Use Pilot, would help the framework balance land uses and identify where nature based solutions are best implemented.

The biological diversity and uniqueness of the species and habitats of the National Park, with the high proportion of some species populations, makes it particularly crucial that conservation management and specialist habitats are not compromised by net zero measures. Climate adaptation should also be considered as should habitat connectivity and delivery at landscape scale.

The need for change within existing land uses should also be considered in order to move to more sustainable systems and practices, although the primary land use may remain the same.

Incorporation of social and economic issues are also key. If we need to use and manage land to meet environmental imperatives, and the RLUF can help to identify what and where these changes are, it should also consider what opportunities and threats might arise for people and the economy as a result and how can these be dealt with.

3. What level of detail is needed for a Regional Land Use Framework to be of use to funders, communities and to land managers?

The level of detail in the RLUF should be sufficient to address issues/find solutions at a regional level to meet higher level (Cairngorms or Scotland wide) targets and outcomes.

4. In the context of the National Park Partnership Plan and as the Regional Spatial Strategy, are there other strategic developments that you consider should be identified?

A Scottish Nature Network must be a key strategic development that will require planning and coordination to work.

This response was compiled on behalf of LINK members working in the Cairngorms National Park area and in the topic areas covered by this consultation. This work sits within LINK's Land Use and Land Reform Group with input from members of other LINK Groups. Members have also submitted their own responses.

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Scottish Environment LINK the voice for Scotland's environment

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