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Dear Debbie,

Consultation on Proposed Extension of Cairngorms NNR and Their New Functions

Thankyou for attending the liaison meeting of the NGOs concerned with the Cairngorms Park Plan, and also for the opportunity to comment on them. I regret also being a little late in responding to your request for views. The three key issues raised seem to be the extension of the reserve, the fulfilment of the NNR functions as newly defined, and the proposal for naming reserves after the estate they occupy.

We comment on these below and refer to paras in your consultation document.

Extensions to the NNR

We welcome the extension and hope that your negotiations for further extensions are successful.

New Functions of NNRs and Their Fulfillment

Of the functions of NNRs, para 7 says they are showcases, and that, "They are managed in ways that puts nature first, and also offers special opportunities for people to enjoy and learn from them." These are welcome functions, but we would raise two caveats.

The phrase "puts nature first" can have various interpretations. There has, in the past, been considerable confusion as the basic meaning of such a term when managing NNRs in the Cairngorms. In my report to SNH, as a private consultant, in 1993¹, I strongly drew attention to this, stating,

"Is or is not the natural evolutionary process a key attribute, possibly the overarching key attribute, of the Cairngorms NNR and associated designated areas such as the Eastern Cairngorms SSSI?"

Time has moved on since then. A key change is the Natura 2000 programme. This has imposed designations with strict protection against ecological damage. However, Natura 2000 designations are often focused narrowly on habitats or species rather than broad evolutionary ecological processes, and contain no provision for ecological restoration!

¹ Conservation in the Cairngorms – a Report and Critique Prepared for SNH North East Region page 7, by R D Watson, Landwise Scotland.

Will the terms “puts nature first” bridge these gaps, or has something central been lost in the functions of the Cairngorms NNR? If so, how shall it be restored?

A second caveat concerns the widespread persecution of non-protected species that has long been the normal practise on grouse moors in particular, through snaring, trapping and shooting. Small mustelids and others have long been heavily culled this way. However, there is every sign the practises are becoming more intensively followed and even species like mountain hares now killed. This is causing increasing public concern. Where would this fit within the term “puts nature first”?

Proposal to Name Parts of the Reserve after the Estates on which they Occur. (Para 21)

This proposal is made on the grounds that it would be confusing to have an NNR with the same name as the National Park but which covers only a portion of the Park (The enlarged NNR would not cover just a “small” portion of the park as stated in para 21).

We regard this as a confused and potentially damaging proposal and are firmly opposed to it on the following grounds

- 1) The Primary Identity of the area is vested in the words “**The Cairngorms**”, not in the term Cairngorms National Park, which in itself does not cover all of the Cairngorms. It was not part of the concept of the National Park that it should subsume all other identities.
- 2) NNRs are primarily ecologically based designations. Spatially, the ecology of Scotland can be broadly understood along three parameters – from north to south as changing latitude takes effect, from east to west as the balance between atlantic, oceanic and continental influences changes, and from high to low altitudes. The Cairngorms reflect the second parameter to some extent, but par excellence are the demonstration of the effects of altitude, wonderfully interwoven with the influence of a diverse underlying geology. Chronologically, across the broad reaches of more recent geological times, like a descending mantle, are laid the pre-glacial, glacial, and post glacial landscapes in a manner unequalled in the UK.

This ecological and geological continuum was at the heart of the then NCC’s case in its opposition to the proposed downhill skiing extensions at the 1981 Lurchers Gully Public Inquiry and supported by the reporter who concluded of the Cairngorms, “—and because the study and appreciation, whether structural or biological, of the Cairngorms must be that of an entity ranging from the valley floor to the highest top. This view has my support because it is logical.” There could hardly be a better summary of SNH’s rationale behind the creation of the suite of Cairngorm NNR sites and it is surely still at the heart of SNH’s concept of the Cairngorms.

The first and most influential piece of information that the public meets of an NNR is its name. That name, should reflect the above all-encompassing continuum. That is solely captured by the term Cairngorms as in **The Cairngorms National Nature Reserve!**

- 3) The idea to name NNRs after the estates they occur on is inherently unsound on several grounds.

Firstly, the names of the estates concerned may be well known (though not necessarily to the visiting public SNH seeks to educate) but boundaries of

estates and boundaries of NNRs upon them often do not coincide, and this in itself can lead to confusion.

Secondly, estate boundaries are simply human ownership boundaries on the map and seldom relate to underlying ecological or geological boundaries. To name NNRs after entities irrelevant to such key considerations carries no logic.

Furthermore, there is a constant confusion between estates as areas of land and estates as social constructs – as evidenced in paras 20 and 21. Para 21 states that estates within the Cairngorms have “-- a well established name and identity, -- “. As already stated, a large part of the visiting public have no such knowledge of estate identities, but the statement is basically wrong. One has only to consider examples such as the acquisition of a series of land areas from several other estates by the RSPB to create a new estate boundary and related social construct, the breakup of Seafield Estates, and the even more recent division of Ogilvie estates in the Angus Glens to realise this. At the same time, even while boundaries may remain constant, the estates as social constructs may change radically– as evidenced by the third Danish owner in succession in Glen Feshie, each of whom could pursue different policies regarding environmental conservation.

- 4) Lastly the four aims of the Park, including the economic functions, are laid out with little clear prioritisation, except for a caveat that, where national environmental conservation and economic or other local needs collide, there should be a presumption in favour of the national environmental and conservational interest. This is a weak and negative safeguard and, in such circumstances, there is considerable advantage in having an all-encompassing NNR name that both reflects that overall structural and biological continuum, *and makes clear where nature is put first, precisely because the National Park is there on such terms!*

For these considerable reasons, we strongly favour the entire suite of NNRs to bear the name **“The Cairngorms National Nature Reserve!”**

I would be happy to discuss any of the above points with you or your colleagues.

Yours sincerely,

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