

Cairngorms Campaign Office,
PO Box
Alford,
Aberdeenshire

Sandra Middleton,
CNPA,
The Square,
Grantown on Spey,
Inverness-shire

Dear Sandra,

Response to Consultation on Proposed Core Path Plan

The Cairngorms Campaign as a voluntary organisation has at its heart both i) the enjoyment and increasing understanding of the special natural heritage qualities, and ii) supporting and recognising the informal recreational value of the wider Cairngorm Area. This is a unique position and it embraces both local and national interests.

We applaud the efforts that have produced such a comprehensive and positive document. We have looked through the Final Draft Core Paths Plan and would suggest the following comments which include both statements of support and objection which we hope will be useful in adopting this plan. We recognise the statutory status of objecting and supporting comments and as such have sought to be clear where we support or object to the plan as currently presented. We also matched some of the strategies and proposals with the Local Plan to satisfy ourselves of consistency in approach between the two plans.

We are very happy to meet to discuss any details should you wish to clarify our position.

Where we make statements of support we do expect to be consulted if the action or strategy in the adopted plan is altered from this draft as we may wish to object to the subsequent proposed alterations. As objections would need to be resolved by public enquiry process it seems valid that an alteration affecting a statement of support should also similarly be agreed with the supporters.

Our comments are general in nature rather than being specific to community areas and individual routes.

We really do congratulate the CNPA on all the good hard work that has gone into this initiative. We find it is a very comprehensive coverage and is a good systematic effort at taking a park wide view of the scope and extent of key paths that support and allow access. Our comments are given recognition of these efforts and with the hope that they may contribute positively to further strengthening this Plan.

COMMENT 1:

We find evidence of a mechanistic view of a concentration on access management techniques and the absence of an overarching recreation policy: this, we find, results in a somewhat partial treatment. The evidence for our view is given in the Introduction on page 4 where the strategy suffers from a vagueness e.g. Para 1.2 quotes the act as requiring access "---sufficient for the purpose of giving the public reasonable access throughout the area." But there is a lack of a definition

of reasonable within the Core Path Plan: we **object** to this lack of definition. To judge the plan one surely needs to be able to judge "reasonable"? In the section on Loch Kinnord it even talks about the request for access by pushchairs – But is this the sort of place one should be able to take pushchairs? At present the Core Path Plan does not allow this judgement to be made. This means that the plan and specific paths may well be difficult to defend during the lifetime of the plan.

COMMENT 2:

Similarly on page 5, the "Aim of the Core Paths Plan" is meant to be defined, and says it must "meet the needs of residents and visitors by providing a range of high quality outdoor access opportunities." Yes but which needs, and what is the definition of "high quality"? In USA the forest service etc are far more specific about defining peoples' recreational needs and being specific as to which facility meets which need.

Specifically it is not possible to assess on the information presented whether the provision of access encompassing a range of restricted and specific abilities and giving a quality experience is adequately met, or similarly whether the provision for horses or for cyclists is adequately met across the area of the plan.

Given that the plan is GIS based it should have been possible to provide the information on a whole area basis of the provision for cycling, specific abilities and horse riding to allow assessment of the adequacy of the network.

We therefore object to this omission.

COMMENT 3:

In the provision of infrastructure for people with a wide and varying range of mobility needs we feel the opportunities need to be assessed more fully. In Glen Roy the interpretative boards outline the nature of the access to the parallel roads and ask people to assess their own capabilities. This does not exclude them and allows them to determine the character of access infrastructure they are comfortable with using. We would like to see a similar approach being developed in the provision of information about the access infrastructure. One a related issue is that if all access infrastructure is of such an engineered standard to meet the needs of those with highly restricted mobility budget constraints start to limit the more general access provision for the wider public. This issue is tackled recently in an American book "The Death of Commonsense".

COMMENT 4:

In the section on Developing the Core Paths Plan (page 6) we find little evidence of consulting Communities of Interest e.g nothing of the people/NGOs with a strong interest in protection of its wildlife, other than landowning conservation bodies. It is just another example of a persistent problem about the lack of an interface with the national community in general and the classification of anyone who is not a local resident as simply a "visitor" which hardly captures our relationship with the Cairngorms – or that of many of our members! We object to this limited view of non-resident recreational users. Again these users are more likely to take a park wide view of the Core Path Network, and their interests are more likely to be served by the analysis required in Comment 4 above.

COMMENT 5:

We generally support the objective and selection criteria so long as **high quality does not mean highly engineered**. We argue that designation of core path status does not mean that the linear route in its entirety has to be engineered. The higher quality, most natural routes may well only be maintained in short sections to protect vulnerable ecosystems. A wet section across a bog (if not a rare or protected habitat), or an un-bridged burn act as natural barriers for some users & tend to protect those people from straying to area that could be hazardous to them. Our contention is that high quality recreational enjoyment relies on the retention of a sense of naturalness that is destroyed by engineered paths and access infrastructure. We therefore **object** to the lack of definition in "High Quality" and would like it to be clarified that a smaller or more remote access route may be designated as a core path, but may not be engineered, may in fact be an informal way that people naturally tend to follow.

COMMENT 6:

We support the selection criteria, but feel there should be a definitive statement of treatment of potential negative impacts from the presence of a core path – such as ".... Should not cause undue disturbance of wildlife or irreversible damage to habitats"?

COMMENT 7: CENTRAL CAIRNGORMS (page 13)

We should strongly support this caveat that people need to be self-reliant in the mountains of the Central Cairngorms, but also consider there should be an equivalent caveat for the Mounth and the Monadh Liath with similar routes identified (eg Firmonth Road in the Mounth; the Old Military Roads Slochd to Carrbridge & Kinveachy , and Slochd to Aviemore via Upper Dulnain & the "Burma Road"): furthermore there is a need to define areas where such a caveat applies firstly in terms of vulnerabilities and of what an area is appropriate for, and thereafter in more detail geographically. This then provides clarity in the implementation of the plan and the management of core paths.

Comment 8: BRAEMAR (page 18)

We have been alarmed to observe how a combination of actions without thought to their overall impact, has created new problems. For instance on Marr/Invercauld

- 1) Path construction up Glen Quich to watershed with the Gairn.
- 2) Construction of bulldozed track by Invercauld Estate from the fairy glen over into upper Glen Gairn
- 3) Provision of car park at Invercauld

In combination has lead to increased ease of gaining access to the central montane core. The result is that people are now getting on their mountain bikes at the Invercauld car park west of Braemar and getting off of them on the slopes of Ben Avon!

We therefore **object** to the provision of any bridge over the Dee in the vicinity of Braemar unless it has been very carefully sited to serve the sole function of providing a round route close to the village. We do not see how it cannot but result in increased access to the montane core by mountain bikers, and in direct conflict with the "long walk in " principle promoted by NTS on Marr Lodge Estate, especially given the bike hire businesses in Braemar.

There must be a mechanism to ensure it will not have negative impacts on the less resilient and more fragile montane habitats and not cause disturbance to the

wildlife from knock on impacts. We **object** to the lack of reference to such an assessment procedure.

COMMENT 9: River Spey Core Path.

We welcome and **support** this bold move to designate the River Spey as a water based core path. This move recognises the National importance of the Spey for canoeing and kayaking, especially given the potential for multi-day voyages. This is exactly the benefits we expect from a National Park, would like to see contiguous sections of the Dee similarly designated in the next version of the Plan.

COMMENT 10:

We **object** to the underlying assumption in the text of section 3.3 that existing paths may be only "upgraded". We argue that some may need to be "downgraded" ie where such paths lead through or to particularly fragile habitats, or where a high quality naturalness exists paths may well need to be taken back or re-instated from bulldozed tracks to foot paths. To maintain a high quality outdoor experience some paths may well need to be downgraded! The evidence of a quality and improving recreational experience provided by such work is that undertaken by the RSPB on Abernethy on the tracks leading to Geall Charn.

COMMENT 11:

Our final comment on the strategy / objectives section is that we find the Plan weak in defining the protected aspect of the designated core paths. We **object** that there is a lack of a defining statement that a core path should not generally be removed, re-routed or closed. Designated core paths should only temporarily and in the exceptional circumstances be closed for justified for reasons of safety or wildlife protection. We understand that as Core Paths will carry a similar level of protection as the existing rights of way the conditions of closure and re-routing should be unambiguously laid down in this plan. The Aviemore Orbital Path shows the importance of clearly defining the limited conditions by which a path can be closed or re-routed: in this example the two areas where the encircling route breaks is through the commercial developer sites of Dalfaber and MacDonald Highland Resorts. To carry weight in planning procedures and to avoid path creation orders we feel the protection aspects of the Core Path designation needs to be clearly laid out.

COMMENT 12: Map 2 Central Cairngorms

We **strongly support** the intention of not waymarking of core paths in the montane core and that promotion of these will be restricted to roadside signs identifying access points to these routes. Similarly we **object** to possible linear or continuous path maintenance on routes such as the Lairig Ghru: the Old Grey Main is quaking in his boots that the way through the boulders at the Linn will be bulldozed and made "safe" for ill-shod feet! We wish to see wording that clearly reflects that the quality and rugged nature of the ways in the montane core will be safeguarded.

COMMENT 13: Match to Local Plan

In the -latest version of the Local Plan, para 4.41 on page 23, refers to the wild qualities of parts of the park and the need to assess development for its impact on these. Policy 7 on page 22 lays down conditions for any development on features such as its qualities of wildness. We **object** that evidence of this cross correlation is not presented, and therefore have to presume it has not happened. This policy is very relevant to the Core Path Plan when considering the positioning and extent of signposting and waymarking of routes. Similarly, engineered paths are definitely an intrusion in wild areas and the rationale for working on paths in these areas should be clearly stated as simply for control of erosion and emphatically to not ease access. It is imperative to remember that, in many circumstances, it is not the ease of access that attracts people but the difficulties and challenge.

Yours sincerely,

On behalf of the Cairngorms Campaign,

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