

Hamish Tench,
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Dear Hamish,

Comments on the Draft Park Plan

Thankyou for taking the time to attend a meeting with NGOs and hear our points of view with patience along with your colleagues, and also for the opportunity to comment on the Draft Plan in writing.

We are very supportive of a great many of the proposed measures in the Draft Plan, such as the aim to develop sustainable deer management, and efforts to provide “affordable housing.” We do however, as we explained at our meeting, have serious concerns about the Plan as developed in the three relevant documents. If we press these concerns somewhat heavily, it is because we realise that this Plan and associated documents will do much to decide the success or failure of the National Park as an entity and of the CNPA as its sponsor and hence it is important that its quality is high.

Andrew Thinn, in his Foreword to the State of the Park Report, says “Sound planning is based on good evidence, identifying what we know, and also, what we do not yet understand.” The documents, as they stand, do not adequately meet that requirement. We feel that although there is much in the statements of intended action, the Park Plan could not be sustained in, for example, in open debate.

We have considered all four documents together as they individually have functions that collectively lead to the Park Plan and our concerns cover the analytical structure, content, process and the communication of the Plan. We discuss our concerns under these headings, drawing out broad issues rather than entering into detailed comment:-

1) Analytical structure and process

The CNPA, as essentially an enabling and facilitating agency influencing broader landuse over which it has no authority, cannot use a model like a Business Plan with clearly specified aims and quantified, time limited objectives, but must pursue a rather more open ended, participative approach. Notwithstanding this, certain key analytical steps are essential. The park plan and its supporting documents are intended to solve problems and map the way to an envisioned future. They must therefore be structured around the basic problem solving analysis as outlined in Figure 1.

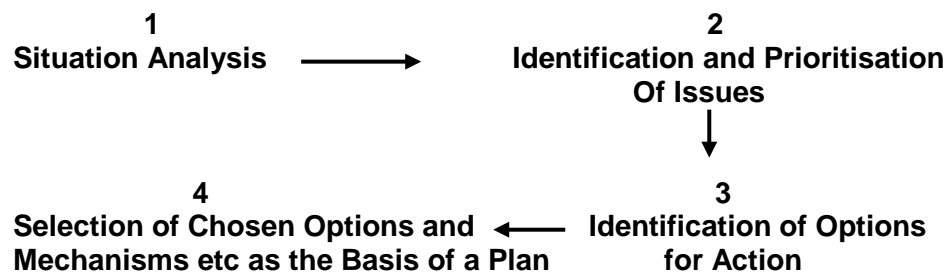


Figure 1 Main Elements of Plan Development

The process is of course not linear, but cyclical, as in the basic management cycle. Collectively, this framework should create a single narrative that leads convincingly to a set of proposed actions. Our concerns lie with the fact that major parts of these basic steps are missing. The Situation Analysis, for example, must contain not only a description of species present, biodiversity, landscape etc, but fundamentally a good description of historical trends within the resource, the key drivers of these trends, and a prognosis of their likely future impacts. However, the State of the Park Report is so brief and imperfect on Trends and Observations that the report is at best a snapshot of the Park at one moment in time. Major relevant trends are not even listed and there is little significant use of historical data even where it is accessible.

Without any systematic analysis of problems, trends and prognosis, the priorities, in the document on Priorities (which suddenly become “Themes”) lack any evidential basis. Deer management, for example, is suddenly a priority – on the basis of a brief statement (page 13) that does not grasp the overall nature and significance of deer management.

2) Content

The lack of such analysis creates, we feel, major problems for the content. If we take for example some of the core themes and issues that lie at the heart of the *raison d’être* of the Park, some of the difficulties become apparent. The Montane Zone is briefly discussed on page 28 of “Looking to 2030” This is an area that has a cluster of well researched and well publicised specific problems, and a kind of area about which, globally, there are well founded management principles. But neither these problems nor the potential application of the management principles are discussed. The theme entirely disappears in “Priorities for Action” and hence the suite of related issues is not really addressed. As the John Muir Trust, in its submission, states,

“Wild Land and Montane areas

The Trust is concerned about the very limited references to “wild land” and “montane” areas. There is a reference to visitors “highlighting the perception of wildness and tranquillity” as a major reason for visiting, as if wildness and tranquillity do not actually exist in the Park. The Cairngorms is a unique place which the CNPA have a duty to safeguard. They are not there to safeguard “the perception” but the actuality.

Since the Park “has the largest area of high ground and most extensive tracts of montane habitats above the natural tree-line in the UK.”, the Trust would like to see more extensive exploration of the threats to montane areas and more detailed actions listed. In the same way, more explicit recognition of the fact that wild land is the cornerstone of the Park’s special qualities should be included along with discussion of the threats to it and actions needed to protect wild land.”

Similarly, the Ramblers Association, considering an issue closely related to the montane zone, states

“Wild land/vehicle tracks

There is not enough emphasis given to the issue of high altitude vehicle tracks in the document, which we feel has become a major problem within the park. High altitude tracks are mentioned in SPR p18 but not highlighted as causing great concern. There is further mention in Looking to 2030, p27-28, but again no real acceptance of the massive ongoing intrusion and huge loss of wildland areas within the park due to the proliferation of vehicle tracks. There needs to be some form of control over the creation of new tracks, and a firm policy towards restoring existing tracks within the plan to reflect the prominence and urgency of this problem and show that it is being tackled. We suggest this should be covered in the Priorities for Action document, Conserving & Enhancing the Park’s Biodiversity and Landscapes, with clear action points given.”

To take another example of a core theme, the Caledonian Pine Forest remnants and the urgent need for action on many of the OCPF remnants has long been identified. The theme is briefly discussed on page 39 of “Looking to 2030” and the need to encourage regeneration as a key issue specifically stated, but the subject does not figure in “Priorities for Action.”

We would point to hydrology as a key theme that is missing, given the broad suite of high lochs, wetlands, and river systems carrying designations, the advent of River Basin Management Planning, local catchment management initiatives, and the growing pressure on water resources in some parts of the Park.

If we consider other key issues, the tendency of tourism to overdevelop and inflict ecological and social damage that outweighs its economic benefits, is a global problem that intensifies in protected areas like the Cairngorms. It is emerging as a key issue in Badenoch and Strathspey. Indeed it is the major cause of the lack of “affordable housing” identified in the previous section in “Priorities for Action.” But in that document, this problem is simply not discussed and the link to the lack of “affordable housing” not made.

We feel that these problems partly arise from the lack of analysis that substantiates the choice of priorities, and also that would bring out the interactions between issues such as deer management, forest restoration, biodiversity management, and agriculture. As a result, Integrated Land Management, as a priority, is treated as a sectoral issue, when in fact it is the overarching process. This leaves the Draft Plan without a foundation on which to build – hence lacking any well prioritised aims, objectives, sense of budgeting etc. It lists a series of intentions, many or all of them commendable, but with little direction or supporting rationale provided by the other documents.

There is however, at least one other cause of the lack of specific consideration of themes and issues and we consider as the first issue under Process below.

3) Process

There are two matters here we would like to take up.

“Looking to “2030” contains a substantial section on “Communities Living and Working in the Park” but no section on the National and indeed International Communities in whose name the Park was declared. We have urged CNPA, in the past, to tackle the problem whereby there was a well financed, well structured and commendable process of engagement with local communities, but a lack of a parallel process for engagement with the national community and none we are aware of for engaging with the international one.

As a result, we feel, consistent biases run throughout the documents. The economic and cultural significance of sporting estates is exaggerated while the economic and cultural and economic significance of outdoor recreation or wildlife-focused activities are largely ignored despite the existence of good data. The red deer problem is quietly largely ironed out of the document (EG In section 5b on page 30 of the “Looking to the Future”) including their indirect impacts on other wildlife. As stated above, the issue of the loss of roadless wild area has long been a major issue in the Cairngorms and was one of the issues that led to the declaration of a National Park. But the whole issue is very underplayed.

Those from outwith the Park, “visitors” etc, through sections on tourism etc, are subtly treated as persons to be educated, accommodated and entertained – not people with a stake in it, extensive knowledge of it, and a right to a say in it. Throughout the document there is a lack of recognition of the communities of interest outwith the Park. This is a serious omission. There is more practical experience and scientific knowledge outwith than within the Park. This needs to be recognised as it makes the document appear parochial and of only local importance.

A second aspect regarding process that we feel needs consideration is the relationship of the Park Plan to the many other plans that are being developed, including River Basin Management Plans and associated local catchment initiatives, revised functions for NNRs and their extension in the Cairngorms with associated management plans, management of Natura 2000 sites, reform of the CAP, the Cairngorms Biodiversity Plans, and indeed your own Cairngorms Local Plan. The Park Plan seems to have evolved in isolation from these, or if it has not, then this is not apparent from the text.

Since CNPA must achieve its goals by voluntary integration of many such efforts, we feel it is important to be clear how the Park Plan integrates with them

4) Communication

We feel there needs to be a more careful use of basic terms and language throughout the series of documents, and greater intellectual clarity. Terms such as “objective” are misused and confused with “aims”. “Priorities” in one report become “Themes” in another, etc. While examples such as these may seem minor, collectively they lead to intellectual confusion.

We would also urge that greater use is made of diagrammatic and other visual aids in demonstrating such things as the interactions between factors, ecological processes, etc as more suited to many people.

As stated at the beginning, we have made our points strongly, and regret if the tenor of our submission is critical. But this reflects our belief that it is important that CNPA produced a workable, quality Park Plan and we have tried to say how the problems we have identified could be tackled. We would be happy to discuss any of the issues raised with you.

Yours sincerely,

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