

CAIRNGORMS NATURE ACTION PLAN CONSULTATION 2018 – 2023

RESPONSE FROM SCOTTISH LAND & ESTATES 14 September 2018

Do you think the aims and priorities capture the main conservation issues we should be focusing on in the Cairngorms National Park for the next five years?

Priority 1: Landscape scale conservation

To deliver conservation at a landscape scale requires the buy in of the landowners and managers concerned, and someone to co-ordinate the work across the various land holdings.

As you know, there are two landscape-scale conservation partnerships already underway in the Park, these are the Cairngorms East Cairngorms Moorland Partnership and Cairngorms Connect. The inclusive nature in which these groups have been established with landowners and land managers has been key to achieving the support from the sector.

Scottish Land & Estates (SLE) sees value in a process which brings together the many and varied interests in how land is used and managed. In this context, SLE believes the Land Use Strategy offers a generic model for the above and if taken forward could serve a very useful role in bringing different interests together to form consensus on integrated landscape-scale work. To help facilitate this there needs to be a mechanism that brings all interested parties together to exchange ideas and to achieve consensus of approach which can then be transferred into practical action on the ground.

In relation to the specific priority actions outlined in the draft plan, please see comments below.

Woodland Expansion

Forestry cover in the National Park area is already higher than the national average. In terms of increasing woodland expansion within the Park, it is necessary for the Park Authority to be clear about what it wishes to achieve through doing this.

Commercial forestry already occurs in the less mountainous areas of the Park. It is felt the draft plan fails to recognise the positive outcomes of this existing habitat which is already delivering positive outcomes against a considerable number of CNPA priority biodiversity, habitat and species conservation targets within the Park.

While SLE recognises and supports opportunities for woodland expansion within the Park, it is important CNPA acknowledges expansion of woodland will displace other land uses and species, and will not be appropriate and/or welcomed everywhere.

More trees on open moorland will directly result in some loss of habitat/landscape, putting pressure on species such as mountain hare, waders and grouse. Predation will become an issue over a larger area, productive grouse moor could become fragmented and deer management changed, with resulting socio/economic impacts. SLE supports the careful approach to woodland expansion being developed by ECMP.

For a whole variety of reasons, landowners and land managers may value other land uses more highly than additional forestry. Put simply, landowners may simply desire to farm or pursue a sporting interest over forestry.

Where woodland expansion is welcomed, private landowners should be given greater opportunity to develop well designed commercial forests that can deliver against other objectives in the plan as well as helping to meet national planting targets. It is therefore suggested that the profile of commercial forestry be raised within the draft plan.

Lastly, there needs to be a very clear case for the advantages that conversion to montane scrub would bring. If the main desire for woodland expansion is carbon storage, then it is questionable that montane scrub would do this effectively enough to justify the “opportunity cost” of not doing other things with the ground.

Nature Friendly Farming

SLE is supportive of this aim.

Waders

SLE recognises the important part wading birds play in Scotland’s rural heritage and that without action there is a real danger these birds could vanish. SLE is partner in ‘Working for Waders’ – a collaborative project established to tackle the decline of wading birds across Scotland. Collaboration is a key strength of the project and SLE would encourage CNPA to help ensure a joint-up approach is being taken. The ECMP already has a wader research project ongoing with BTO.

Integrated woodland development

Thinking about how trees might work alongside farming to benefit farmers is only one aspect of integrated land management, but it is an important and relevant one that can result in many more benefits than an eventual timber crop.

SLE is supportive of this integrated and less sectoral approach to land management and recognises the valuable opportunities forestry can bring to farming. A well designed woodland can provide shelter for stock, improve feed conversion rates and help to extend the growing season; infiltrate water run-off to reduce diffuse pollution; provide a future timber resource which can produce new and secure long term, tax free income streams; provide a valuable food source and cover for game birds and increase biodiversity on the farm and help to address climate change issues. In respect to this action, there are several funding streams available to landowners and farmers wanting to create and manage woodlands on their land and/or integrate trees into their business and increase farm viability. In addition, SRDP offers an Agroforestry option. These should all be promoted as part of this action.

Freshwater and Wetland Restoration

It would be helpful see an action which builds on the partnership ethos and one which increases engagement with land managers and offers practical advice to reduce pollution risks and encourage a catchment approach– this is likely to yield greater results.

Peatland Restoration

As an organization, SLE understands the value of Scotland’s peatlands to the environment, economy and society and our members are committed to delivering in the wider interests of Scotland..

Peatland restoration projects have taken place across the Park in recent years. Three estates in Upper Deeside have carried out schemes and the Monadhliath Deer Management Group has made a good start towards achieving landscape scale delivery of this. Having secured Peatland Action funding, the group is in the process of restoring peatlands identified as being in poor condition across 14 estates in the area – some of these within the Park boundary.

Facilitation and funding have been key requirements to achieving success. Having a project officer who can pull together the necessary funding applications and offer practical delivery work to deliver projects on the ground - giving landowners information and advice in a manner that is conducive to building a working relationship has been critical to the successful delivery of this action.

It is important that CNPA works with landowners to address any peatland issues rather than merely issuing a restoration and enhancement program. Future peatland restoration actions within the Park are likely to require the same approach and level of commitment as detailed above.

Large herbivores

With respect to the impacts of both wild and domestic herbivores, an integrated approach is required to managing grazing and browsing levels to ensure that they are sustainable in environmental terms while optimising the economic benefits to businesses and communities within the Park. In particular regard to wild deer, CNPA clearly recognises the benefit of collaborative management as represented in the eight Deer Management Groups which lie wholly or partly within the National Park. All DMGs address the particular circumstances of their areas in their Deer Management Plans. It is right that those Plans, on which CNPA is consulted, should set population targets which meet both the land management objectives of their members and the public interest as represented in the Park strategy and Nature Plan. SLE does not support the setting of overall deer density targets for the whole Park which second guesses an established and effective process which is already delivering sustainable deer populations at local level.

Priority 2: Focused action for priority species

SLE considers that it is important to take a holistic approach to conserving biodiversity and that single species management programmes should sit within a wider ecosystem approach.

There has been an ongoing movement within nature conservation away from single species or single habitat focused work towards a more integrated landscape scale approach. This shift in thinking is to be endorsed as it is important that all of Scotland is conserved and not merely the best habitats and the most iconic species. However, given the critical situation of certain species, SLE recognises there is still a place for specific targeted conservation within this wider ecosystem. If this does not occur, there is a risk that their situation will deteriorate even further, and extinction could become a real possibility. SLE therefore fully accepts that there is still a place for a specific, short list of species requiring immediate action, this should however be set within the wider ecosystem approach context.

SLE would like to make the following comments on some of the priority species identified for action.

Scottish Wildcat

SLE is a project partner and a steering group member of the SWA project. We are supportive of this action and think it appropriate that SWA is identified as the lead partner. However, the SWA project is only

funded until 2020 with yet no legacy project identified, should there not be a second lead partner identified to offer support beyond this?

It should also be noted that SLE is the Chair of the Scottish Wildcat Action Land Management sub-group which has recently been established to take forward some of the actions identified in the SWA Action Plan in relation to land management and best practice. Given the first set of actions outlined in the plan for the species, SLE would suggest CNPA works closely with this group.

Beaver

Given the northern extent to which beavers have been detected (close to Pitlochry) SLE agrees it is appropriate that CNPA starts to think about the possibility of the natural expansion of beaver into the national Park.

SLE believes the lead partner in any action on this should be CNPA (in close collaboration with landowners) and the "Scottish Beaver Forum". The Scottish Beaver Forum is an SNH led forum which provides a platform for discussion between interested groups and is responsible for the development of the Beaver Management Framework - expected to be launched later this year.

The plan refers to the lead partner being the 'Scottish Beaver Group' (and CNPA). SLE is unclear what the 'Scottish Beaver Group' is and who this is comprised of.

Once beaver receive European Protected Species status, any management should be undertaken in line with the SNH Beaver Management Framework. The framework ensures that those negatively affected by beaver have access to management controls, in addition it also sets out where management actions require a licence from SNH.

Capercaillie

SLE supports the priority action for this species. However, there is a general feeling among SLE members that greater communication is needed by the Park on conservation efforts for this species. There is generally felt to be a lack of openness, information and dialogue about the work. Those who have Capercaillie on their estate know little about the work going on by CNPA and feel the CNPA Capercaillie Project would benefit from greater landowner representation, with at least one local landowner sitting on the project steering group.

Mountain Hare

Ensuring sustainable mountain hare management is one of the main workstreams of the ECMP. Estates will be developing monitoring and management systems in line with recent research by GWCT and JHI and working with SNH. However, SLE believe that publicity in recent years about mountain hares has seriously misrepresented the position on the ground as directly experienced by our members, in particular a very recent report by RSPB and Adam Watson. SLE looks to the Park to take a balanced position and to be robust about the need to manage hare populations within the Park where the need arises.

Raptors

Again, raptor conservation is one of the main workstreams of ECMP and SLE supports the collaborative approach being developed, particularly for Golden eagles and Hen Harriers. SLE has some concern about the objective of developing of "raptor tourism" as it can have detrimental impacts on the raptors themselves. We believe that raptors, once they have achieved satisfactory conservation status, must be

seen in the context of wildlife and habitat generally. SLE will continue to work with PAWS partners on eliminating illegal killing of raptors which has now reduced to a historically low level.

Curlew

The Curlew has become an emblematic wader species and is one of the most endangered, and we strongly support a focus on helping it to recover through project such as ECMP/BTO and Working For Waders. Our members know that wader conservation requires long term action on habitat and predator control, and we would caution again about the potential impact of increased woodland cover on waders – they are simply incompatible and the Nature Plan needs to recognize that openly.

Priority 3: Involving people

In respect to the implementation of ‘guidance on engaging communities’ SLE is supportive of this and has been involved in the development of the guidance. We consider that the guidance can be a useful tool in helping our members engage with their communities on decisions that will have a significant impact.

Community engagement has improved dramatically in the last 20 years and members are positive about continuing and strengthening this. Members in the Park believe that land management is generally meeting public/community needs however, following responses to the ‘9 Big Questions’ consultation there was a general feeling amongst members that many communities may simply be seeking more engagement rather than ownership or management responsibilities.

The cost, lack of practical resources and limited capacity or confidence have been cited as barriers to effective community engagement, and we therefore see the Park Authority as having a crucial role to play in helping to facilitate better engagement.

There also remain concerns amongst some members that many people who are new to living in the Park’s towns and villages might not be well connected with the countryside and have very little first-hand experience or in-depth knowledge of rural land use and thus might not fully understand nor appreciate that land is usually managed as a business. It is our hope that any “culture change” achieved in relation to enhanced community engagement using the guidance would also address this disconnect.

In the longer-term increased collaboration and engagement will take time and will involve a change in culture. Both landowners and communities have rights *and* responsibilities in this respect. SLE is working with its members and other stakeholders to improve community engagement in relation to the guidance and would be happy to provide further detail on this work.

Do you think the targets capture the progress the Action Plan is looking to make, and do they have the right level of ambition?

SLE is not sure how helpful specific targets are. There is no description detailing how the target figures have been set, making the targets feel rather arbitrary.

A direction of travel might be easier to follow, which sets out where the Park is presently at, where it hopes to get to, how this will be delivered and monitored, delivery mechanisms (funding and support) available, what success will look like and how this will be measured.

Do you agree with the objectives for ecosystem restoration?

SLE considers it is important to take a holistic approach to conserving biodiversity and that single species management programmes should sit within a wider ecosystem approach.

Landowners and farmers across Scotland carefully manage their land and consequently deliver significant benefits for biodiversity. All of this is carried out in the context of operating a financially viable business operation. SLE members are acutely aware of the importance of having healthy functioning ecosystems in Scotland because their businesses are dependent on them.

SLE is pleased that sustainably managed moorlands for sporting and grazing are recognised in the 2063 Vision, as cultural and economic landscapes and for their benefit to rare and endangered species.

Do you agree with the objectives for sustainable land management?

SLE welcomes the movement towards valuing the environment in a more comprehensive manner, otherwise it will always remain outside the market and will never be fully valued. Managing our natural assets to provide the goods and services we need is recognised by members as being a priority.

Do you agree with the objectives for involving people?

Overall SLE is content with the objectives.

As tourism in the Park continues to grow, with estates welcoming thousands of visitors a year, the need for increased engagement and awareness raising to ensure that people are visiting the countryside in a responsible manner is imperative. There are increasing incidences of irresponsible access being taken, particularly in relation to unauthorised mountain bike trail building and an increase in access being taken to wildlife sensitive areas and issues around irresponsible dog walking – all undertaken to the detriment of sensitive sites and species.

SLE welcomes initiatives such as the ‘Tread Lightly’ campaign. Under the priority “Get more people actively and responsibly enjoying nature” we would welcome the widening or rewording of this last action to include education and awareness, we believe this is required, particularly if the Park is to encourage more people to engage to connect with nature it is important they understand and are aware how and why it is important to take responsible access to the outdoors and care for this exceptional environment which is also living, working environment visited by many.

Does the Action Plan focus effort on the right species?

In general, SLE is content with the list drawn up. Please see comments in response to question 1.

Please let us know if you have any other comments about the Cairngorms Nature Action Plan 2018-2023

Overall the actions set out in the nature plan are generally supported. Members are keen to see focus on delivering and output and for these to be strategic and economically driven. Land based businesses are perhaps overlooked as important partners in tourism and business.

Lastly it would be helpful within the actions tables to identify alongside the lead partner what the available funding and support mechanisms are for the delivery of each action.