



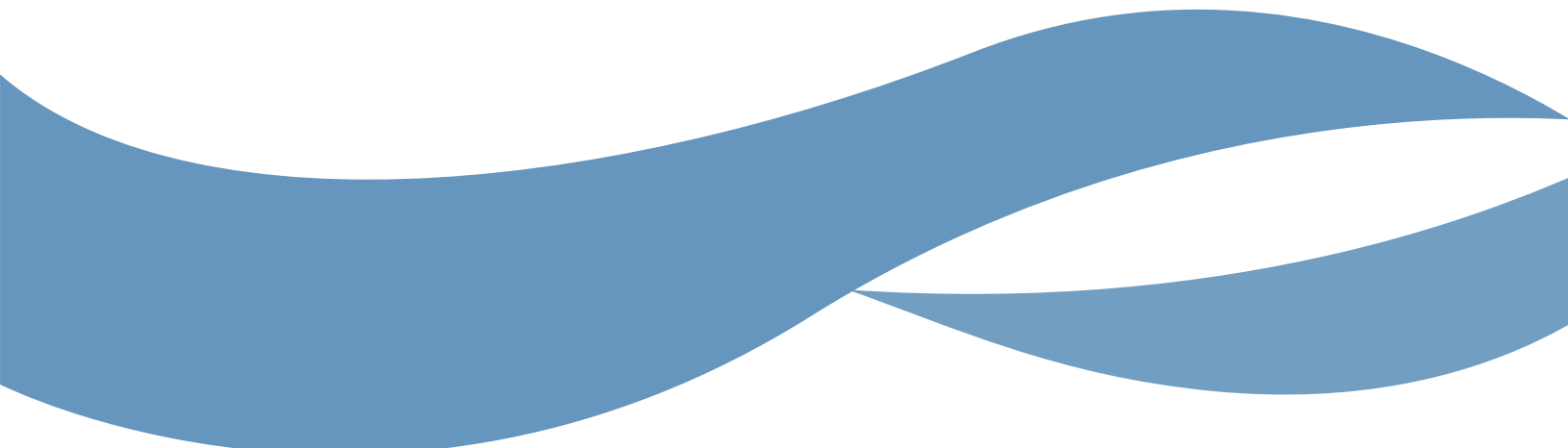
National Park Partnership Plan 2022-27

Cairngorms National Park

16th December 2021

About Scottish Land & Estates

At Scottish Land & Estates (SLE) our work helps to ensure that rural Scotland thrives. We are a membership organisation for landowners, rural businesses, and rural professionals. We promote the wide range of benefits land-based businesses provide: tourist attractions, leisure facilities and landscapes enjoyed by the public, as well as housing, employment, tourism & enterprise and farming opportunities. We represent the interests of our members and wider rural Scotland to the UK and Scottish Governments to help ensure that policy and legislation reflects the unique requirements of rural Scotland and its communities.



Introduction

The Cairngorms National Park Authority's National Park Partnership Plan is of great importance to Scottish Land and Estates' members who reside and work within the Park's boundary. The objectives and actions set out within the Plan will influence land management practices for years to come, and will influence policy and practice throughout Scotland.

On the whole, Scottish Land and Estates feels the proposed plan is a progressive document, with many objectives that would ensure that the economy of the Park continues to grow, as well as retaining its status as a key visitor destination within Scotland. We also believe that some of the policies will ensure that nature continues to thrive in the Park, with land managers being at the heart of wildlife and habitat conservation and restoration.

However, we are concerned that some key objectives, especially those found under the "Nature" banner, seem to move well beyond progressive policies without robust evidence or clear policy rationale, and may adversely affect the ability of land managers to deliver positive outcomes. Examples include Objective A2, which states that the majority of future forestry would rely on natural regeneration, without the need for planting or fencing. No justification is given for this goal which appears to be contrary to the Scottish Forestry Strategy and Scottish Government planting targets. In addition, C10 states that it plans to work with communities to ensure that the majority of land allocated for development around villages and towns in the National Park is controlled by communities or public bodies to help manage long-term development needs. Previous experience within the Park shows that attempts to engage communities in development matters have had limited success and at times have acted as a barrier to private-led affordable housing. In addition, evidence shows that it is the excessive costs and convoluted planning systems that often discourages developers to undertake projects in rural areas.

Our members are key delivery partners across the majority of actions and objectives contained in the Plan and have real concerns that the shared vision of a Park which delivers for nature, people and place would not be delivered if some policies as currently drafted are progressed. In addition, we feel that the targets and indicators for some outcomes are not effective measures of success. Our detailed response below highlights our concerns as well as suggesting alternative approaches.

Nature

A2: Increase the amount of woodland cover in the National Park to ensure bigger, more natural woodlands, expanding up to a natural treeline, providing connections across river catchments and around the central core of the mountains. The majority of this will be native woodland and will be allowed to regenerate naturally, without the need for planting or fencing. A minimum of 35,000 ha of new woodland cover created by 2045.

SLE members in the CNP, who are predominantly in the private sector, have and continue to play a vital role in helping Scottish Government achieve its ambitious tree planting targets and we welcome the ambitious target of creating 35,000ha of new woodland cover by 2045. However, we do have some concerns with how the Cairngorms National Park sees the target of 35,000+ ha being achieved and principally the exclusion of commercial forestry from this target.

We fully support opportunities for native woodland expansion and where practical for this to be delivered by natural regeneration, but we would question how realistic and indeed practical it is to suggest that the majority of the 35,000+ target will be achieved via this route.

The right tree in the right place is crucial and we would like to see a balanced approach taken integrating tree planting with other land-based businesses ensuring we get the best from land.

The process of natural regeneration and tree establishment requires there to be enough seed source, conditions need to be right to support germination and initial growth and there needs to be protection from browsing pressure. It would be helpful to understand the evidence base behind this target and if the National Park has undertaken any preliminary work on this.

On the point of fencing, it would be useful to understand why the National Park has taken the position it has when at a national level there are no plans to reduce the amount of protection provided through fencing (deer and stock) as long as value for money can be evidenced.

Fencing is an important and recognised tool in forest management enabling trees to establish and offering protection against browsing from not just deer (this is the only herbivore referenced in the entire plan) but other herbivores including sheep, rabbits, hares, and voles. The use of fencing also gives certainty with regards to meeting the management objective without risk of failure and possible grant repayment (where these have been accessed). It is we feel vital that fencing continues to remain as a tool which can be utilised for woodland management.

It is essential to have woods that balance the need to generate income through commercial forestry with biodiversity, landscape, and amenity. Commercial forestry already occurs in the less mountainous areas of the National Park and plays a significant role in sequestering carbon, providing jobs, and creating places for people and nature; yet despite this it is disappointing to see no mention of commercial forestry or any recognition of the important economic, social and environmental opportunities commercial forestry provide rural communities.

It is also important that we keep planting forests to meet demand and avoid the need to import more timber. Scotland is the only part of the UK to have set wood use targets, a vital step to decarbonise construction by substituting 'carbon-heavy' building materials like concrete and steel with low energy wood, a material that locks away carbon and which can be easily reused and recycled. It is disappointing that the Cairngorms National Park Authority seems to have chosen to completely ignore this valuable industry and the important social, economic and environmental contributions it makes.

A3: Restore and manage peatland within the National Park to reduce carbon emissions and improve biodiversity. A minimum of 35,000 ha peatland restored by 2045.

The peatland restoration challenge in Scotland is huge, and one which our members are wholeheartedly embracing. The Scottish Government, within its Climate Change Plan has a target to restore 250,000 ha of peatland by 2030, this equates to 25,000 ha per year. Last year Scotland managed to restore 6,000 ha and it has become very apparent that there is a mismatch between the aspirations of peatland restoration ambitions and the collective ability to deliver at scale.

The short term nature of funding and a lack of flexibility over timescales for implementation has meant that for many land managers peatland restoration has either been extremely challenging to deliver or work has been unable to progress. Bad weather (generally January until April but sometimes from December), the bird breeding season (February to late autumn), land management activities (deer stalking) and the time taken to process funding applications have combined to constrain the restoration window to around 6 months per year.

A shortage of access to qualified and experienced peatland contractors is limiting delivery potential with demand of qualified workers outstripping supply. This demand in contractors has also been exacerbated due to very high demand in the construction sector for machine operators and staff shortages due to Brexit or Covid.

There is a positive willingness among land managers to pursue peatland restoration and we fully support the ambitious target set within the National Park plan. However, scaling up targets can't happen without significant coordination, and it will be important that the challenges around delivery are addressed and we strongly encourage the National Park to work with others at a national level to address these.

We would like to see mention of monitoring within this objective. It is important to understand if the quality of restoration being undertaken is to a satisfactory standard. Longer term monitoring could also help provide important information on changes in peatland condition following restoration, helping to evaluate the success of different restoration techniques and allowing for knowledge transfer.

A4: Reduce deer numbers across the National Park to enable woodland to expand, restored peatlands to recover, and wider biodiversity and landscape enhancement to take place.

We support the need for further localised reductions in deer where impacts from deer remain unsustainable and act as a barrier to land use change, principally native woodland restoration, expansion, and peatland restoration.

We do however disagree with the focus the Cairngorms National Park places on deer densities and believe that assessing impacts needs to be at the heart of effective deer management, rather than a blanket density figure.

It is our view that grazing impacts should be the key consideration of the need to manage local populations and that this must be considered with the grazing impacts of other herbivores (hill sheep, feral goats, hares, and rabbits) present. The target/indicator section states that *"average red deer densities on the open range are five to eight per km² across the National Park by 2030"*. However, no explanation is given as to how this figure has been reached, and further clarity on this would be appreciated. Given the vast geographical area covered by the CNP, it seems irresponsible to give such a figure without providing evidence to justify it. Information on habitat condition that considers deer impacts is what should drive effective deer management, not a blanket limit on deer density. Deer density alone is a crude indicator to use, and it would be far preferable that Deer Management Groups (DMG) in the National Park continue to work to achieve population densities that maintain deer at a level that is sustainable locally.

Deer are an important asset of the National Park and managed sustainably produce a wide range of social, economic, and environmental benefits both locally and in the wider public interest. There are many land management businesses in the National Park who operate stalking enterprises which provide valuable revenue and employment as well as being an asset for tourism. It is therefore important that deer management strikes a balance between the climate and biodiversity crises along with the important economic and cultural role of deer in Scotland. Sweeping maximum deer densities is unhelpful to achieving this balance.

In addition, no information is provided about the ongoing cost of this deer management. If landowners and managers are expected to finance this, will support be made available by the CNPA? Given that the sporting rates that landowners pay are calculated on holding size as opposed to deer numbers, and will not alter even with reduced deer numbers, adding additional financial pressure onto these rural businesses will undoubtedly cause unforeseen issues in the future.

We are supportive of the target to contain the distribution of Sika and Fallow deer in the National Park by 2030. The practical limits of what can be achieved need to be recognised and containment of fallow deer which exist within the southern section of the National Park might be more realistic than that of Sika which are well established in the Monadhliath mountain range with individuals also observed in other areas, including Deeside.

A5: Reduce the intensity of game bird (grouse, pheasant, partridge) management within the National Park. Encourage lower density grouse shooting, as well as the adoption of best practice management techniques and sustainable pheasant and partridge shooting / releases.

Any proposed measures by the CNPA should be closely aligned with increasing strong industry standards on game bird releasing, which can be found in the British Game Alliance/Code of Good Shooting Practice and the GWCT guidance which has just been updated:

<https://www.gwct.org.uk/media/208606/Sustainable-gamebird-releasing.pdf>

GWCT guidance is already embedded in Scottish law and as a result, we do not believe there is any need for CNPA to try to invent something new. Practitioners understand and accept this guidance and it would fit with the CNPA objective of ensuring sustainability of game management. If the CNPA believe that the special nature of the Park demands lower levels of gamebird release than elsewhere then we believe further discussion is required along with information to support this policy rationale. We would like to suggest that an increase in Wildlife Estates Scotland (WES) accreditation is also considered as an indicator for this outcome.

Whilst the CNPA makes no specific reference to walked-up grouse shooting, they indicate that they still want to “encourage lower density grouse shooting” and best practice implementation. However, Government policy does not talk about “reduced intensity”. It wants to see more acceptance of losses to avian predators and regulations on muirburn and medicated grit (operations which enable higher densities), but nowhere in the response to Werritty is it advocating reduced densities of grouse per se.

Densities of grouse are already highly variable on different estates in the Park, according to natural factors and different management styles and estate objectives. There is no data on which to assess current densities or what densities might be considered desirable or economically viable so a general reduction is meaningless. It also does not acknowledge the key point that most of the conservation benefits of moorland management (e.g. wader and mountain hare breeding, wildfire protection) depend on grouse management at a sufficiently high level to justify staff and equipment to carry out predator control and rotational muirburn. A move to low density grouse management would have unintended consequences.

Additionally, we do not feel that the positive effects of existing game bird management have been acknowledged by the CNPA. For example, as was found in *“The socioeconomic and biodiversity impacts of driven grouse moors and the employment rights of gamekeepers”* report commissioned by the Scottish Government in 2020, well-practiced muirburn techniques were seen to improve biodiversity of affected areas:

[Summary Report - The socioeconomic and biodiversity impacts of driven grouse moors and the employment rights of gamekeepers \(www.gov.scot\)](https://www.gov.scot/publications/summary-report-2020-21/pages/1-10.aspx)

More recently, Denny, S *et al.* (2021) sought *“to present the current evidence-based knowledge relating to the economic, ecological and social sustainability of driven grouse shooting”*. From an economic perspective, their report concluded that *“It is unlikely that the alternative uses [to grouse shooting] that are proposed by some groups for the moorlands would deliver the same positive economic impacts, at least for a number of generations”*. The report can be found [here](#).

With regards to biodiversity, Denny, S *et al.* (2021) concluded that *“Compared with upland areas where grouse shooting does not take place, the biodiversity of ‘grouse moors’ seems to be at least as rich, if not richer.”*

Denny, S. *et al.* (2021) concludes *“We believe that our conclusions, detailed above, are supported by the currently available evidence. However, we are conscious of the danger of legislation being driven by public (non-evidence based) perceptions of issues such as animal welfare, muirburn, rewilding etc. It is important that policy makers are presented with evidence, in a form that they find useful. This report will help in the production of this useful evidence.”*

We feel that there is no need for the CNPA to deviate their proposal away from existing Government policy, especially as the rationale for doing so remains unjustified. SLE and its members are committed to working to deliver best practice and manage grouse moors sustainably.

As per our pre consultation discussions with the CNPA, we question the use of average gamebird bags per unit area as a target/indicator. This presupposes that the number of birds shot has a direct relationship with negative consequences – but given that grouse are a wild species and populations vary due to a wide range of factors then the measure is not a direct correlation with management practices. We would suggest a more positive indicator is used – and suggest that either membership of WES or BGA is considered.

Objective A5 also proposes an objective to *“reduce the intensity of(....pheasant and partridge) management within the National Park”*. As previously discussed with the CNPA, we question the evidence basis. The draft Plan states that with regards to releases of non-native gamebirds in the National Park *“....information is patchy. There is a need to get a better handle on the data around these releases, to look at the impacts on native wildlife and to ensure a better regulated system.”* We suggest that work is done to establish data on pheasant and partridge management. We fully support management in line with best practice and again suggest that WES and BGA are used as positive indicators.

A6: Stop burning on deep peatlands (currently defined as greater than 50 cm depth) and licence burning on shallower peatlands to reduce carbon emissions and encourage natural regeneration. Reduce wildfire risk by ensuring wildfire action plans are in place.

Regarding peatland, we believe the CNPA should tie their objectives in with Government policy, which is broadly that all muirburn will be licensed and muirburn on peatlands (over a depth yet to be re-defined) will be banned (Government announcement in principle November 2020). This new regulation has not yet been worked out and may not be finalised until after the new Park plan starts, and we believe it would be very confusing if CNPA objectives were not the same as what is eventually devised by Government for the whole of Scotland.

We also believe that there needs to be clear recognition that estates who practise muirburn have the equipment and skills to provide a front-line wildfire fighting resource, and that regular muirburn keeps down fuel load levels, thus reducing risk of wildfire. What the draft plan says about wildfire is correct but it needs to be more focused on effective actions. Covering wildfire and muirburn in the same objective gives the wrong impression that wildfires in CNPA are caused by muirburn. While poorly managed muirburn for grazing purposes in the north and west of Scotland has resulted in some large wildfires, analysis by the Scottish Fire and Rescue Service in 2019 showed that small scale muirburn for grouse of the type practised in the Cairngorms very rarely causes wildfires. Carefully managed muirburn is overwhelmingly a positive activity as regards preventing wildfire - this is supported by SFRS and increasingly recognised around the world.

A7: Work with farms in the National Park to reduce their carbon footprint through improved management of grasslands and soil. Help join up habitats and ecosystems through increased woodland and scrub, restoring freshwater areas and supporting a greater variety of species. Agree carbon and biodiversity management plans with farmers in the National Park to help guide activities. Carbon and biodiversity plans are in place for farms across the National Park by 2028.

We support, with caution, the use of carbon and biodiversity audits as a form of baselining. Carbon audits have previously been funded (£500 per farm business) and, following the recent Scottish Government announcement, that funding will continue as part of the National Test Programme. However, it is national subsidy support policy which will encourage land managers to have carbon and biodiversity plans in place, and it would be remiss of the CNPA to impose this prematurely.

The Scottish Government needs to continue to support research that underpins innovation in farming, forestry and other land uses to promote the uptake of new techniques and systems. It is important that businesses know their 'starting point' before undertaking improvements, and this is where baselining can add value, provided it is relevant at the individual holding level considering their specific system rather than a generic 'one-size-fits-all' approach.

There remain many unknowns with carbon and biodiversity audits where the current available software does not include all inputs and outputs to derive the carbon footprint. This needs further development to include, for example, carbon in soil, hedgerows, heather, and other land features, and where offsetting via sequestration is already taking place across all enterprises in the farm business.

We do not yet have a commonly agreed process for accurately measuring on-farm methane emissions, and the (potentially positive) impact of grass-fed livestock taking into consideration the full life cycle including carbon sequestration in grass, versus other management options. Within the CNP, at the national and international level, we must understand the true cost of importing food. By true cost, we mean not just the price on the shelf, but published research into the animal health, climate and biodiversity costs of producing, processing, transporting and consuming food from countries with different standards to those in Scotland. There is an opportunity here for the CNPA to promote an "eat local" drive within the CNP.

It is important to know what the current situation is. Therefore, biodiversity audits will be required, with funding support to incentivise land managers to take part, but we must also be realistic as to how this can

be achieved across the CNP. Many land managers will already be delivering significant biodiversity and wider-environmental benefits, but we do not have a robust process by which to accurately measure, record and value their contribution.

As part of an integrated approach to land management, it is important to understand and enable a mix of land uses. Encouraging cooperation at the landscape scale on issues such as watercourse management, flood mitigation, hedgerow planting and woodland creation will have a greater impact and deliver greater benefit than land managers working in isolation.

A8: Target rural payments to support sustainable food production, reduce carbon, increase and maintain the health of habitats and ecosystems, enhance biodiversity and help connect different habitats across the National Park. As part of this we will establish a Regional Land Use Partnership and Framework for the National Park which helps national and local government, communities, landowners and stakeholders work together to achieve net zero and find ways to optimise land use in a fair and inclusive way. Establish a Regional Land Use Partnership and Framework for the National Park by 2023.

SLE generally supports an element of targeted rural payments as outlined in Objective A8. However, rural payments subsidy support will be led by central government (Holyrood), and we know from SNP manifesto commitments that by 2025 half of all funding for farming and crofting will shift to conditional support with targeted outcomes for biodiversity gain and a drive towards low carbon approaches.

If an element of future support is to be 'conditional' then there is an expectation that some data collection will be required in order to evidence an outcomes-based approach to support. A robust evidence base is required to ensure that outcomes sought can be achieved through the changes being implemented, and appropriate levels of funding will be required to encourage uptake of data collection.

There are business efficiency and long-term business sustainability benefits for farmers and land managers in maintaining and improving their natural assets. Information and advice services are vital to assisting continuous improvement, and it is essential that rural businesses have access to skills, training, and knowledge to become more productive and resilient. There must be a realisation that if we are going to produce food, there will be greenhouse gas emissions. What agricultural businesses can do is make efficiency improvements and reduce inputs, such as nitrogen fertiliser for example, which will in turn help to reduce GHG emissions. The two are not necessarily mutually exclusive.

The plan must take an integrated approach to land use, no longer looking at forestry, farming, moorland, water quality and other policies in isolation. The focus of capital funding should be to support the achievement of outcomes, rather than prescribing exactly how to go about achieving them. Farmers and land managers should be empowered to make decisions to best deliver the outcome expected, with support and advice.

We are supportive of the RLUP pilots across Scotland, including in the CNP. In the Programme for Government and SNP manifesto, there are natural capital policy commitments, including to fund investments in natural capital for the climate (for example, peatland restoration). RLUPs are an opportunity to channel funding to incentivise this type of land use change, however the final decision on implementation must rest with the land manager.

With the RLUPs in an advisory role, cooperation between communities and land managers at the landscape scale can help to deliver wider environmental, economic, and social benefits from appropriate land management practices. It is vital that land managers engage and have a voice within these groups.

However, there is a danger that the RLUP pilot will become just another discussion group, with much of the detail on what RLUPs will mean on the ground still missing. It is hoped that some of this will be

established in phase one as the governance structures are developed. There are a variety of land uses taking place in the CNP and the composition of the RLUP pilot must be designed to reflect this.

A11: Enhance ecosystems across the National Park by increasing the area of land managed principally for their restoration. At least 50% of the National Park to be managed for ecosystem restoration by 2045.

Rural businesses play an important role in delivering for the environment and are uniquely placed to deliver positive environmental benefits, including protecting and improving the natural capital for which they are responsible. Many members are already leading the way and taking a proactive approach to restoring degraded ecosystems (tree planting, restoring natural processes and species translocations). Our members stand ready to go further and faster but to achieve this ambitious target of 50% will require partnership working and appropriate funding and support.

While we are fully supportive of the ambition to increase ecosystem restoration it is important that a balanced approach is taken, and social and economic factors are balanced alongside environmental objectives in order that the future of the CNP is sustainable socio-economically as well as environmentally, as otherwise environmental gains will be at risk. It is important that restoration is undertaken in parallel with sustainable economic development and can coexist in harmony with other sustainable land management practices.

It is also important to recognise that every area is different, outcomes can be unpredictable and unique to each site and different approaches will be appropriate in different places. The historic knowledge land managers have of their land and how the landscape is utilised should also be considered and local know-how needs to be combined with local policies to deliver action on the ground.

Specialist knowledge and support will be required for some restoration activities and to reach the ambitious targets set out in this plan is going to require a well-resourced and experienced advice service that gives land managers the necessary help in developing and implementing the appropriate management.

Finally, it would be helpful to understand the rationale behind why 50% has been identified as a target. What evidence has been used to guide the decision-making process for this target and what will be the economic and social impacts? Discussions with the Cairngorms National Park during pre-consultation stage indicated that there was no evidence-based rationale in place as to why 50% has been identified as a target. We find this deeply concerning and would expect the National Park to take evidence-led approaches to objective and target setting. It is vitally important that those who manage the land and are being asked to change their management practices fully understand the reasons as to why they are being asked to do something – otherwise buy-in will not be achieved.

A12: Develop a more complete understanding of the National Park's species, habitats and ecosystems, and help monitor progress over the long-term through a dedicated Cairngorms Nature Index. Develop and roll out the Cairngorms Nature Index by 2023.

We are supportive of this objective and have had some insight into this work through our involvement with the Cairngorms National Park Nature Strategy Group. It is important that a holistic approach is taken to conserving biodiversity and that single species management programmes sit within a wider ecosystem approach, we feel the Cairngorms Nature Index will be an asset and will allow for evidence-led decisions to be taken and allow for targeted conservation action where it is most needed.

A13: Manage sites designated to increase the diversity of species present, improve habitats, store carbon and build resilience to climate change. These benefits will be delivered alongside current

commitments to maintain and enhance designated features within the area. Designated sites contribute to an ecological network and wider ecosystem restoration.

We support this objective and recognise the important role designated sites play in delivering a nature-rich future and in addressing the biodiversity and climate emergencies. This will need to be considered carefully on a site-by-site basis however, as management prescriptions for the conservation of designated features will often conflict with those which may benefit other biodiversity and carbon objectives.

Land managers continue to play a crucial role in delivering the ambition for designated sites. We would like to see future work encourage land managers to work together at a landscape scale level as it is unlikely that biodiversity conservation goals will be met by solely protecting habitats or species or designating certain areas for management.

A landscape scale approach is essential, and we feel a stronger commitment from the Cairngorms National Park Authority could be made with regards to the development of an ecological network. There are opportunities to be had to connect designated sites with other landscape scale initiatives already taking place within the National Park for example Cairngorms Connect, East Cairngorms Moorland Partnership and the Wildlife Estates Scotland initiative.

It is essential that policies and regulations are well-designed, well-funded and well-implemented to allow land managers to deliver on this designated site commitment. Support mechanisms need to assist land managers to manage these sites and it is important that a more enabling approach is taken where policies and funding mechanisms complement one another rather than compete. It can be very difficult to match a site and its requirements to the grant scheme(s) available and it is frustrating for land managers to be told that they have a designated site in poor condition, but that there is no agreed practical and funded way of improving this has only adds to this frustration. While we appreciate some of these challenges are out with the decision-making remit of the National Park, it is important that they are understood and that the park works with NatureScot and others to address these.

Engagement is going to be key in terms of success. It will be important that the National Park Authority engages with land managers and supports them in identifying conservation goals and the reasons behind any prescribed activity for a site. Being able to identify simple result measures that indicate how a land manager knows when the target outcome(s) has been achieved for a site will encourage greater stewardship and help ensure effective delivery of this objective.

Lastly a collaborative approach involving land managers, local communities and wider stakeholders is needed which highlights the importance of designated sites. Currently very few communities and those visiting the National Park know where designated sites are or why they are important. For areas which receive high visitor footfall/pressure this is an important consideration especially for those sites which have features that are vulnerable to high levels of visitor disturbance. This presents an opportunity to both enhance the visitor experience and assist in conservation of designated features.

A14: Protect vulnerable species and ensure they get back on a sustainable footing, less reliant on targeted action and recovering within a network of habitats. Where necessary, reinforce existing populations and reintroduce lost species as part of a suite of measures to restore biodiversity in the National Park. Ensure species and habitat management adapts to a changing climate. Species Recovery Curve.

Land managers are committed to ensuring the natural and cultural heritage on the land they manage is protected, conserved, and enhanced. Most land managers are already actively engaged in and support the various conservation projects which exist within the Cairngorms National Park, both through the labours

of the hundreds of their employees who look after the CNP on a day-to-day basis and also with regards to more focused individual conservation projects.

It is important that new projects that either look to reinforce existing species and/or reintroduce lost species are considered in a balanced way and local views are fully considered with land managers, public bodies and communities working together to address the biodiversity crisis.

Decisions on reintroductions must be evidence-led and there needs to be appropriate consultation and wide-spread community support. There should also be detailed consideration of what the likely impacts would be to existing native species and land use. Where appropriate, mitigation and support measures should be in place to protect those who might be negatively impacted by any reintroduction.

There are many species for which we have international obligations; we note the detail in the summary for this target which says “tough choices about species currently seen in the National Park may have to be taken” – what is the decision-making process for making these tough choices?

A15: Attract private green investment into the National Park to fund nature’s recovery and share the benefits between communities, landowners, workers and wider society. Private finance will be as important as public money in funding nature’s recovery given the scale of the climate and biodiversity challenges we face. The Cairngorms National Park attracts a minimum of £250m of green finance for carbon and biodiversity projects by 2045.

The Scottish Government Climate Change Plan acknowledges that landowners and private investors are an important part of the solution to climate change and wants to see a collaboration between “carbon buyers, landowners and intermediaries”. If we are to achieve ambitious climate change and biodiversity targets, the public purse alone cannot support the investment that is required, and this presents an opportunity for private finance. However, it is landowners of all types and sizes that are being asked to take the risks over the long-term.

There is a misconception that large parts of Scotland are for sale to so-called ‘green investors’ to offset their own emissions, which is absolutely not the case. It is important to ascertain the motivation for private investment. There needs to be a realisation that if we want to produce things then there will be a carbon impact, but this should not all just be offset and therefore ‘exported or offshored’. Sequestration is only one part of the equation; emissions reduction is the other. Businesses must strive through technological improvements to reduce their own emissions.

There are also other elements to consider as to the wider benefits. If judged through the single lens of net-zero, then private investment is to be welcomed. However, the wider social impacts also need to be understood. For example, purchasers of land for environmental reasons have the same responsibilities as any other landowner, to involve and inform communities in what they are doing. At the same time, the impact on local jobs, and crucially housing need to be considered, as they are vital to ensure we have thriving rural communities.

It would be helpful to understand the significance of the £250m target relative to the 2045 objective. Have projects been identified within the CNP? What format or vehicle is being proposed for green finance? More detail is required.

Community benefit can be delivered in many ways, and commercially viable businesses, which create jobs, housing and wider amenity value, help deliver much of what we all want to see in a thriving rural economy. Collaboration and utilisation of all resources and expertise will help deliver the best outcomes that we all seek.

A16: Work with farmers, estates and other land-based businesses to protect, manage and restore habitats and ecosystems across the National Park. Use ‘nature-based solutions’ to support a diverse economy that will be an exemplar for rural economies across the UK. The number of land-based businesses using nature-based solutions increases.

It is important as a starting point to define what is meant by ‘nature-based solutions’, as this means different things to different people. We are not convinced there is any substance to this objective, or its relevance to the wider CNP plan. The focus should be to support the achievement of outcomes, rather than prescribing exactly how to go about achieving them. Farmers and land managers should be empowered to make decisions to best deliver the outcome expected, with support and advice. Rural businesses are expected to make significant changes over the next few years, and to support them in this, we should ensure that enhancing productivity, business resilience, and environmental benefit are top priorities.

We cannot stress enough the importance of taking an integrated approach to land use policy, rather than looking at activities such as forestry, food production, carbon sequestration and natural capital in silos. For example, there are areas where farming will always struggle to be profitable, particularly in less favoured areas, but there should be recognition of the wider benefits delivered from land management activity in those areas. Such benefits, in addition to employment and producing food, include providing habitats for wildlife, improving water quality, sequestering carbon, and natural capital for the public good. Integrated land management is at the heart of what our members do, and we are supportive of a move towards outcome-based approaches.

Landowners and land managers are custodians of the natural assets required to help Scotland meet its ambitious net-zero targets, and many have taken and continue to take positive steps to address the climate and biodiversity crises. Landscape scale projects have and continue to be a major factor in the ability to deliver objectives in key areas such as forestry, farming, renewables, and rural housing.

People

B2: Work to stabilise or increase the proportion of young and working-age people in the National Park relative to the total population.

We agree with this objective. Increasing the proportion of young and working-age people within the National Park will be crucial to the success of many of the objectives set out within the Partnership Plan.

B3: Develop a well-being economy that encourages diversification, attracts sustainable inward investment and builds on the existing strengths of the Cairngorms. Economic activity in the National Park is based on its special qualities; we will prioritise opportunities that provide year-round employment and well-being for communities across the National Park, as well as those that promote a circular economy, helping reduce waste and our wider impact on the environment.

Developing an economy within the Park that encourages diversification, attracts sustainable inward investment and builds on the existing strengths of the Cairngorms is a positive, albeit optimistic, objective.

An active push towards encouraging the diversification of business enterprises within the Park will bring greater stability to the Park's economy which, as has been shown by the ongoing Covid-19 pandemic, is key to the continued prosperity of the communities within the Park's boundaries. Sustainable internal investment into these businesses will help promote their continued growth which will ensure the continued availability of employment opportunities for locals.

Given the parameters that have been set out within this objective regarding opportunities that will be "prioritised", it would be helpful to know whether the CNPA intends to have a framework against which businesses can compare their business plans to see whether they meet the expectations set by the Park authority. Whilst we recognise that businesses that provide year-round employment, promote a circular economy and minimise their impact on the environment should be encouraged and rewarded, it would be gratifying to see that existing businesses are given the opportunity to improve their business models so they meet these same expectations and don't miss out on the chance of continued investment from the Park.

We would also be keen to hear what policies are being proposed for the development of a well-being economy in the National Park. We think the development of a well-being economy in the National Park would require increased levels of connectivity and digital infrastructure, and favourable business rates to encourage diversification. In addition, the vocational upskilling and training opportunities outlined in objective B5 would be of crucial importance to achieve this circular economy.

It is important that there is sufficient affordable housing to accommodate employment in the area. This issue has been addressed in our response to objective C8.

B5: Significantly increase skills and training opportunities for people in the National Park – with a particular emphasis on the land use sector – to ensure opportunities created by the growth in green jobs can be filled by local people.

We believe that this objective is of the utmost importance, especially when considered against objectives B2 and B3.

Increased skill and training opportunities will encourage more young people to stay and work within the Park. Many people move to urban areas for educational reasons, and then stay due to the greater opportunities for work. If these training opportunities were readily available within the Park, fewer people would feel compelled to move, thus helping to promote a circular economy. In addition, we support that

the emphasis of training provided will be for jobs within the land use sector, which emphasises the Park's desire to fully utilise its available natural capital.

We would welcome a definition of what the CNPA means by "green jobs". This is a term that has been used with increasing prevalence by public bodies throughout Scotland, but is one that is yet to be given a firm definition.

B6: Increase the area of land in the National Park that is in community ownership, or where the community is directly involved in its management.

SLE believes that the ownership structure of land is of less importance than ensuring it is effectively managed, no matter who owns it. Community ownership should not be seen as an end in itself. Ownership of all types provides positive outcomes for communities.

As the CNPA has stated there has been little appetite for large scale community ownership, more clarity will be required about how this will happen. All landowners are subject to the principles of the Land Rights and Responsibilities Statement and should as a matter of course inform and involve local communities in major changes to management practices. Whether this extends to transfer of ownership or direct involvement in the management is a matter for the individual owners.

B7: Empower individuals to make decisions about their local community through citizens' assemblies and juries. Support community councils to become stronger local democratic bodies that plan for their local areas and allocate resources.

We support the principle of collaboration and engagement between landowners and communities, including community councils, as this is a tenet of responsible land ownership which aligns with SLE's Landowner Commitment. We support the principle of devolved planning and resource allocation. There needs to be an inclusive and transparent framework for this to take place.

Place

C1: Work to stabilise the growth in the number of people who visit the Cairngorms National Park during the peak season, while ensuring their enjoyment of the National Park and time spent here increases. The focus for any growth should be on the off-peak season and on those areas that have capacity to manage extra visitors.

SLE supports the further promotion of areas less visited within the Cairngorms National Park, but cautions that the potential impact that visitor displacement will have upon more rural communities and land holdings must be considered.

Visitor awareness of the region as a year-round destination should be enhanced, with particular marketing emphasis being placed on the shoulder months. These measures will potentially reduce the visitor pressure on 'hot-spot' areas more frequently visited and demonstrate the diversity and breadth of the area to previous and new visitors. Areas with greatest potential and less significant impact are to the east of the National Park.

C3: Encourage a transformative change in the way people get to and move around the National Park.

We are supportive of this objective, and believe there are numerous changes that could be made to change the way people move in and around the Park.

We believe the CNPA should work in collaboration with national transport organisations (Scotrail, Stagecoach etc.) to promote the use of public transport for getting to/from the National Park. Make the journey part of the experience, much in the same way that families travelled to their holidays 40—50 years ago.

An increase in the provision of Park and Ride facilities within the Park would benefit those visitors who continue to arrive in their own vehicles. This could be aided with the addition of free travel passes or vouchers for use on public transport during visitors' stay. We likewise would support the development of a 'hop-on' / 'hop-off' bus network between key visitor locations.

We also believe there should be an increase in the availability and breadth of green public transport network options across the National Park. This should extend to morning and evening services across the year (weather permitting) to encourage the use and sustainability of more remote hospitality venues such as cafes and restaurants. This could be further enhanced by ensuring that all new visitor public transport infrastructure should be green - either electric or hydrogen powered.

Centres of popular visitor towns like Aviemore could be made into traffic free zones, as has been successfully achieved in other high density tourist locations. This would make the location a far more relaxing place to be, with the added benefit of less pollution.

Lastly, although ambitious, schemes such as completing the link with the Strathspey Steam Railway from Aviemore to Grantown could be considered.

C4: Improve path, cycle and access networks to be the best in Scotland.

SLE supports the expansion of the network of safe cycle routes across the area. However, funding must be made available for the maintenance of existing paths before creation of new ones commence, as the former is likely to provide much greater value for public money.

An increase in the availability of e-bikes for hire at central points and large accommodation providers would give visitors an alternative way to travel across the Park. However, consideration needs to be given

to the conservation of more remote areas of conservation sensitivity which e-bikes may open up to much greater wear and tear and disturbance.

SLE also supports the improvement in the quality of the core paths network across the area.

To promote the use of bikes in the Park, public transport (including buses and the steam railway) could offer additional bike transportation services. Also consider the option of 'a bus out – ride home' service. This would enable people to explore wider areas of the National Park

C5: Work closely with partners across the National Park to manage the impact of visitors and provide a high-quality experience. Ensure public infrastructure is of a high standard, able to cope with demand at key destinations, and consider how to best utilise areas of the National Park with capacity for increased visitor numbers.

Again, SLE supports the aims of this objectives and believes there are numerous measures that could be undertaken to achieve it.

Firstly, the CNPA will need to ensure there are sufficient 'boots on the ground' such as Rangers to engage with visitors, primarily in a welcoming role but extending to enforcement where ultimately required. Whilst there is a huge workforce of individuals currently doing this daily with the CNP, from farmers and rangers, to gamekeepers and guides, greater support for these individuals could provide a very cost-effective way of achieving this outcome.

Secondly, the CNPA should work to identify methods that will encourage visitors to stay at less frequently visited locations that are away from hot-spot areas, ensuring that these less-frequented areas share in the benefits brought by visitors and tourists.

To cope with high demand at key destinations, improved infrastructure needs to be provided at overnight stop-off points, particularly toilets and emptying facilities for motorhomes. In addition, the CNPA should look to reduce the planning and procedural burden for the creation of seasonal overnight or short-term stop-off points for motorhome users.

Regarding best utilising areas of the Park that have the capacity to help manage visitor numbers, appropriate capital funding assistance for estates who are prepared to release areas for visitor stays could help encourage more rural landowners to consider this as a viable diversification option for their land.

Collaboration between CNPA partners and other bodies/groups is already quite positive, but going forward there needs to be consensus around the challenges, objectives and actions required to deal with the problems seen during 2021/22. Specifically this includes discussions with and consideration of landowners and managers.

C6: Provide outstanding opportunities to experience the natural and cultural heritage of the National Park via our promoted path network, while minimising disturbance to vulnerable species, habitats and sites.

In conjunction with Visit Scotland, the CNPA has a significant role to play in the education of visitors, and this extends to pre-travel awareness of the locality and any specific restrictions of which they may be unaware. Land managers/owners cannot be expected to fulfil this role.

The CNPA should encourage NatureScot to take a more significant role in educating visitors in terms of responsible behaviour in the outdoors.

NatureScot see themselves of the guardians of SOAC but offer little in terms of constructive support for land managers. They additionally need to demonstrate a greater degree of consistency in terms of access management between NNR sites and other designated habitat locations.

C8: Ensure that there is sufficient housing stock to enable people to live and work within the National Park. Ensure the private rented sector provides appropriate security of tenure for people working in the National Park.

Whilst SLE agrees with the initial statement that there needs to be sufficient housing stock for those living and working within the Park, we would welcome greater clarity on what is meant by the term “appropriate security of tenure” when discussing residential properties in the Private Rented Sector (PRS).

Ensuring there is sufficient housing stock for those living and working within the Park is crucial to achieving objectives B2 and B3. Without a ready supply of houses available, those individuals looking to work in the Park will be forced to move outside of its borders, negatively impacting businesses and communities that would benefit from their presence.

To deliver on this objective, the CNPA will need to ensure that the Park’s planning process is streamlined to ensure that new development proposals are not delayed unnecessarily, and is not so overly complicated that developers are reticent about proceeding with development proposals. As found within Savills’ 2020 report on *“The Role of Land in Enabling New Housing Supply in Rural Scotland”*, published on behalf on the Scottish Land Commission, convoluted planning systems and high development costs played a far more significant role in preventing the development of new houses than the often-suggested issue of landowners withholding developable land. This report can be found [here](#).

The economics of development in rural areas of Scotland such as the Cairngorms National Park can often be challenging. In some (but not all) market areas there is not sufficient value in the completed homes to accommodate some of the costs that are driven by planning and technical conditions imposed by local authorities (and other public sector stakeholders such as SEPA and Scottish Water). These requirements can act as a barrier to development, even when there is a willing landowner and a willing developer. Recognising this at a local level would act to transform viability in a number of projects and thereby remove some of the key barriers to development that are in the public sector’s control whilst smoothing the whole land acquisition process. It is therefore vital that the development system within the CNP is seen by potential developers as being welcoming and not overly restrictive.

In addition to improving planning legislation regarding the provision of new housing developments, the use of Change of Use planning applications should also be encouraged as a means of increasing available housing stock. This may also encourage the development of empty and derelict buildings across the CNP, an issue which is of key importance to our membership.

Greater clarity on what is meant by “increased security of tenure” within the PRS is necessary. SLE and its membership are aware of the importance of the sector in providing housing to those living and working within the Park, and the promotion of good relationships between landlords and tenants has been one of SLE’s key messages in recent years. However, the existing Private Residential Tenancy (PRT) legislation is already severely balanced in favour of the tenant, reducing the control landlords have over their own properties and those who occupy them. In the rare cases that a landlord seeks to evict a tenant, the existing legislation makes it very hard for them to do so, an issue which has been exacerbated by the Covid-19 pandemic. The idea that additional measures will be put in place that will provide tenants with greater security of tenure is concerning and considered unnecessary. In our experience, landlords only seek to evict a tenant when they are in breach of tenancy. It is well understood that the more restrictions that are

placed on landlords, the more likely they will be to remove their properties from the sector. This would detrimentally impact the supply of affordable accommodation available within the CNP.

C9: Help resolve key worker and affordability issues with new housing in the National Park.

SLE would also support the inclusion of a planning policy to provide greater flexibility for housing development that provides affordable accommodation for rural businesses, as part of our position on the Wellbeing Economy. The proposed planning policies in NPF4 could be a barrier to this flexibility in planning for rural housing and this would have to be considered.

C10: Work with communities to ensure that the majority of land allocated for development around villages and towns in the National Park is controlled by communities or public bodies to help manage long-term development needs.

Effective community engagement and working with communities is in the best interests of all stakeholders in land.

The term “allocated for development... is controlled by communities” implies that as soon as the land is allocated, any final choice or input is taken away from the landowner and automatically handed to the community. If this is the case, SLE would caution that this risks overriding the legislative processes in place such as the community right to buy scheme.

This objective also implies that it is private landowners who are not delivering on long-term development needs. As referenced in C8, Savills’ report on *“The Role of Land in Enabling New Housing Supply in Rural Scotland”* showed that this was not the case. It would be useful to know why the CNPA might believe otherwise.

Therefore, while we fully support community engagement and collaboration in shaping decisions about land and communities, we are of the opinion that any final decisions on land management should remain with the land manager, provided they are practising responsible land ownership and good stewardship for the community, which includes positive community engagement.

C11: Take action to ensure villages and town centres in the National Park are thriving places where people live, shop and meet.

SLE agree that town centres in the National Park should be thriving places where people live, shop and meet. Given the relationship between privately owned land and its proximity to town centres and villages, we would like to know what the ‘action’ will look like, i.e. what policies and actions will be taken to further this objective?

We also believe that private rights vs public interest should be considered carefully in any action taken and recognise that with private landownership comes the responsibility of responsible landownership in relation to villages and towns in the vicinity, in line with our Landowners’ Commitment, and therefore encourage this from our members.

However, SLE also strongly encourages the protection and increase of rural populations within the National Park, and towns and villages should not be favoured at the expense of fragile rural communities. Again, this could be facilitated by increased affordable housing development in rural areas, which would also contribute to year-round employment in neighbouring towns and villages ensuring they are thriving places.

Policies

Policy A2: The management and use of land should deliver multiple benefits and help deliver the Regional Land Use Framework. This will be supported by:

- 1. A long-term planned approach by land-based businesses to delivering environmental, economic and social benefits.**
- 2. Supporting land managers to plan and deliver environmental and social benefits, underpinned by sound economic businesses.**
- 3. Applying a regionally-targeted approach to rural payments to deliver the most appropriate range of public benefits to the National Park.**
 - We support this policy as it is essential for businesses to have clear and long-term support and messaging from bodies to enable them to plan and develop with confidence and to ensure that desirable outcomes are possible. The sound economics of these businesses will be essential to deliver the social and economic benefits.
 - Any targeting of support and payments however must enable land managers to retain control of their business and make decisions on that basis.

Policy A3: Enhance the resilience of habitats, species and land use to climate change, pest and disease risks, ensuring that the integrity of designated sites is maintained with a particular focus on:

- 1. Collaborating on land use and flood management, including natural flood management, through river catchment management plans.**
- 2. Enhancing the health and connectivity of habitats.**
- 3. Expanding woodland on appropriate soils.**
- 4. Securing protection and restoration of degraded peatland, and sustainable management of peat and carbon-rich soils to maintain and improve their ability to store carbon.**
- 5. Prohibiting fires on deep peat and reducing burning on shallow peat soils through licensing.**
- 6. Reducing deer numbers across the National Park to facilitate woodland expansion, peatland restoration, biodiversity and landscape enhancement.**
- 7. Applying a 'green engineering first' approach to flood management and water storage within catchments in the National Park.**
 - As previously stated, more work needs to be done to move away from blanket targets for numbers such as deer and make it clear that the carrying capacity of the land will be taken into account.

Policy A5: Conserve and enhance habitat quality and connectivity while ensuring the integrity of designated sites is maintained, with a particular focus on:

- 1. Supporting woodland creation and management, especially natural regeneration that delivers more natural and native woodland cover, to create habitat connections between catchments and minimises need for fencing.**
- 2. Wetland conservation and enhancement.**
- 3. Protection and improvement of the water environment.**
- 4. Delivering a combination of ecosystem services including natural flood management, carbon sequestration and storage, timber and food production.**
- 5. Public greenspace and transport networks managed for biodiversity enhancement and habitat connectivity.**
- 6. Supporting off-site mitigation from development that contributes to ecological networks.**

- As in our answer to previous questions we have concerns around the viability of creating the scale of woodland desired, with the means outlined. The method of establishment may not be fully compatible with the policy context to deliver the speed and consistency of woodland expansion required to meet the climate challenge.

Policy A6: Conserve and enhance the species for which the Cairngorms National Park is most important, with a particular focus on:

1. Species whose conservation status is in decline or at risk.
2. Tackling and reducing the impacts of invasive non-native species.
3. Tackling and reducing wildlife crime.
4. Engaging people on species that are important in the National Park.
5. Promoting biological recording of species in the National Park.
6. Undertaking appropriate work for species reintroductions or reinforcement as required.
 - Species reintroduction must come with clear policies on how decisions are made, how balanced and fair consultations are carried out and what measures are in place to mitigate any negative impacts of reintroductions, prior to further reintroductions.

Policy B1: Deliver a well-being economy in the Cairngorms National Park by strengthening existing business sectors, supporting business start-ups, developing green jobs, supporting diversification and maintaining the number of workers employed in the National Park through:

7. Maintaining the population of the National Park and maintaining or growing the proportion of the working age population.
8. Supporting the diversification of existing land-based businesses.
9. Encouraging growth of business sectors that draw on and support the special qualities of the National Park, such as sustainable tourism and food and drink.
10. Supporting business start-ups and diversification that delivers circular economy benefits.
11. Promoting the Living Wage for the Cairngorms National Park.
12. Broadening the economic base of the National Park into sectors such as the creative industries and renewable energy, and making stronger links with higher and further education.
13. Increasing provision for business land where there is an identified need and demand, and supporting the use of land for small business, particularly within settlements.
14. Slowing outward migration of young people to encourage their return, and supporting the inward migration of workers to the National Park to meet business and community needs.
15. Providing a housing land supply that supports young people and workers and maintains vibrant communities.
16. Reducing the proportion of vacant and second homes to support community vibrancy by ensuring that new housing development best meets local needs.
17. Maximising the proportion of new housing development that is affordable in perpetuity and using short-term let control areas and licensing of short-term let properties to manage the impact of second homes and short-term lets on the housing market, and availability of housing for residents and workers.
 - Clarity will be needed on the definitions within the Wellbeing economy, particularly what constitutes a “green job”. Similarly, more detail on the means of support to be offered and how it can be accessed by new and existing businesses.
 - Planning policies which are enabling for business development will greatly enhance the desired outcomes. Particularly with renewable energy, clear signals on how this is

envisaged and how this can tie in with the wider policies will enable businesses to plan and develop further and faster.

Policy B2: Support and build the capacity of communities to deliver their aspirations, with a particular focus on:

- 1. Supporting communities to plan for their own futures, develop and implement projects, engage the support of partners and share good practice.**
- 2. Supporting innovative approaches to providing affordable housing to meet local needs.**
- 3. Supporting communities and landowners to work collaboratively on management of land for shared benefits.**
- 4. Aligning community planning processes to simplify support to communities.**
- 5. Engaging communities effectively in the long-term management of the National Park and in projects or programmes that affect them.**
- 6. Supporting community and public sector control of land for development.**
 - As with our answer to objective B6, community ownership of land should not be an end in itself, rather what can be delivered through a range of ownership models, blending private and public finance to enhance outcomes.

Policy C1: Enable sustainable patterns of settlement development, infrastructure and communications while maintaining the integrity of designated sites by:

- 1. Consolidating the role of the strategic settlements identified in the current and future Local Development Plans as the most sustainable places for future growth and the focus for housing land supply.**
- 2. Providing any additional flexibility in future land supply for housing at small sites around a wider range of settlements.**
- 3. Supporting sensitively-designed improvements to the A9 and other trunk roads and the main railway line as an integral part of enhancing the connectivity of the Highlands.**
- 4. Planning and improving integrated and sustainable local transport networks that allow for safe travel off-road and link with public transport.**
- 5. Planning and improving integrated public transport that meets the needs of residents and visitors to the National Park.**
- 6. Planning and supporting improvements to the information technology network.**
- 7. Planning and supporting improvements to the mobile communications network that improve access to new generation technology and minimise the need for visually intrusive infrastructure.**
 - As with our answer to objective C8, the complexity of the issues around availability of land, particularly for small rural developments needs to be understood. Enabling planning policies will be critical to solving issues, particular in unlocking land for housing development.

Policy C2: Support development of a low carbon economy, with a particular focus on:

- 1. Increasing renewable energy generation, especially biomass and hydro, that is compatible with conserving the special qualities of the National Park and maintaining the integrity of designated sites. Large-scale wind turbines are not compatible with the landscape character or special landscape qualities of the National Park. They are inappropriate within the National Park or in areas outside the National Park where they adversely affect its landscape character or special landscape qualities.**

2. Supporting businesses and communities to use less energy, reduce emissions, improve the energy efficiency of existing buildings, generate low impact renewable energy, reduce, reuse and recycle resources, and plan for a changing climate.
3. Maximising the benefits to communities through direct use of locally generated energy or, where sold to the grid, reinvesting income to support community development.
4. Promoting high standards of sustainable design and efficient use of energy and materials in construction.
5. Electrifying public transport, and increase cycle-carrying capacity in trains, buses, and taxis.
6. Installing electric car and bike-charging facilities as well as disabled access toilets and changing places at visitor hubs when investing in upgrades or refurbishment.
 - As with Policy B1, planning policy will be critical in the enhancement of low carbon energy production from renewable sources. Battery and power storage options will be required to meet many of these objectives.

Policy C6: Conserve and enhance the cultural heritage that helps to create the sense of place and identity of communities within the National Park by:

7. Protecting archaeological sites and their settings and promoting understanding of their significance.
8. Ensuring appropriate advice and investigation for archaeology is used to inform proposals for land use change.
9. Protecting and enhancing the built heritage and designed landscapes.
10. Promoting opportunities to enjoy and celebrate the cultural heritage of the National Park, including its arts, sports and community heritage.
 - We support this policy and the acknowledgement of current offerings as well as historically and economically important tourist offerings, which bring many benefits to the park and local communities.

Actions

Nature

Our first comment on the actions is that in most, if not all, and this is particularly true for “Nature”, land managers will play a key role in their delivery and therefore SLE and our members should be considered key partners on a wider range of actions. It is only through collaboration and strong two-way communication that the objectives can be met.

A1 will require secured funding and accurate reporting. Another action which could be aligned to this is the identification of carbon audit tools which fully reflect both the emissions generated and carbon which is sequestered through land management.

A5 actions should be undertaken in the order stated. Before any regulation there is a need to fully understand the issues.

Within A6 there does not appear to be any actions to investigate wildfire mitigation, which will be needed if muirburn is reduced. The potential to remove one mitigation without a well thought-out and actionable alternative could prove catastrophic.

People

It is vital that local employers are part of the conversation as to the specific needs for skills and employment. They can also help to deliver mentoring and apprenticeships.

For more detailed information

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