

The new CNPA Partnership Plan – is this really the best our National Parks can do?

## Description

I have previously touched on elements of the Cairngorms National Park Authority draft Partnership Plan (e.g [see here](#) and [here](#)) and wanted to take a look at the Plan as a whole as it is supposed to provide the framework for what the National Park will do over the next five years. It's therefore the key document for anyone interested in what the National Park intends to do in future (which is not to claim documents are everything).

The CNPA consultation, which closes 30th September) focuses on what they have identified as major issues, or [the Big 9](#) as they have branded it. Before reading the Plan, or the nine evidence reports that accompany it, I would suggest you jot down your own list of issues and compare these to the those the Park has identified. What doing this highlighted for me was there are major omissions from the draft Park Plan.

### My Big 9

The landscape of the Cairngorms  
Wild land and natural processes  
Land ownership and use  
Recreational infrastructure  
Resources to make things happen  
The CNPA's powers and use of them  
Better paid jobs and sustainable land-use

### The CNPA Big 9

Landscape scale conservation  
Deer and moorland management  
Flood management  
Visitor Infrastructure  
Active Cairngorms  
Learning and inclusion  
  
Housing

Accessibility of the National Park

Community Capacity and empowerment

What improvements the CNPA will deliver in the next 5 years Economic Development

## Landscape

While the Plan makes a reference to the special landscape qualities of the National Park, this paragraph is about the sum total it has to say about landscape:

Landscapes constantly evolve as habitat change is implemented. Landscape change can be gradual and subtle occurring over many years e.g. grazing damage, annual incremental mature tree removal from moorland or conversely woodland/scrub regeneration onto moorland. Landscape change can be more dramatic and sudden e.g. new hill tracks, fencing, windfarms, wildfire and new forest plantations.

Don't be fooled by the heading in the Park's Big 9 "landscape scale conservation" as this is about conservation, not landscape. There is nothing in the Plan about landscape threats to the Park or what the CNPA has been doing about this, except a brief mention that it will maintain its opposition to all wind-farms in the National Park. Welcome, but is that it? Its almost as though, having taken a stand against wind-farms, the CNPA feels its stuck its neck out far enough. There is no reference to the extent of the new hill tracks that scar many of the hills in the National Park, no mention of the impact of the Beaully/Denny power line in the Drumochter, no mention of the destruction at Cairngorm, no consideration of whether attempts to mitigate hydro schemes to date have been successful nor how best to mitigate the dualling of the A9. Nothing.

The absence of any plans to protect the landscape unfortunately implies the CNPA will allow the attrition of the Cairngorms landscape to continue. Is this what National Parks are for?

## **Wild land and Natural processes**

Closely related to landscape issues, is how we protect wild land and allow natural processes to flourish. While the Plan includes the SNH wild land map there is no analysis of how wild land has been impacted on over the last 5 years. The sad fact is that the CNPA has allowed the area of remote land to reduce, mainly through a failure to control the creation of hill tracks. This is what the Plan has to say about hill tracks:

### **5.8 Hill tracks**

Tracks are a necessary component of land management, facilitating access to remoter areas enabling important habitat and species management such as deer control. However, inappropriately sited or constructed vehicle tracks can have detrimental impacts on the visual landscape, in particular where tracks extend into remote wild land areas or are on higher ground.

This view, that hill tracks are required to facilitate access to remoter areas for land management purposes, needs to be challenged. Deer used to be culled and shot without tracks and tracks have

made it much easier for estates to kill wildlife they perceive as vermin. Tracks are not necessary, they are a political and economic choice but the consultation offers us NO choice.

Moreover, while the Park considers conservation from a management perspective I could find not a single mention of restoring natural processes outside the paper on flood management. Indeed, the current re-wilding debate seems to have passed the Park by. The de-designation of the Cairngorms National Nature Reserve has allowed the CNPA simply to abandon any commitment that in the core of the National Park nature should come first. Instead, the Plan asks us to consider how to ameliorate the worst excesses of landed estates in the way they manage the land for grouse and red deer.

The management approach though is clearly failing. The CNPA's own figures show that 1/3 of the European protected sites are in unfavourable condition, almost entirely down to the way the land is being used or rather abused. The Special Protection Areas and Special Areas of Conservation were supposed to be the jewels of the crown in the National Park, until Brexit at least, and it should be to the CNPA's shame that they are still in such poor condition. The Plan will only be able to offer more of the same, and continued failures, until it starts to look at alternatives that put wildness at the core of nature conservation in the National Park.

### **Landownership and use.**

The draft Plan contains no critical analysis of the impact of current systems of landownership in the Park and proposes no ideas for change. While one of the Big 9 issues is Community Empowerment, there is no analysis of the potential for community ownership or control of land in the National Park and nothing about how the CNPA might assist communities to take over and run estates. There is no analysis either of how the different types of landowner (public agency, voluntary sector, progressive private landowners such as Glen Feshie, traditional estates) impact on the ability of the CNPA to meet its statutory objectives. Without such an analysis, it's simply not possible to devise a Plan which will deliver those statutory objectives.

### **Powers of the National Park**

The Plan contains no analysis of how the CNPA has used its powers to date and how it might do so in future. The implication of the many failures of the CNPA to enforce planning decisions effectively is that landowners can do what they want. There is hardly a reference to Development Planning in the entire document, a major omission when the CNPA does not have full planning powers and needs to work in partnership with local Councils on planning matters. There is also no consideration of how the

CNPA might use its powers better to meet its statutory objectives, whether bringing in byelaws to control hunting or ensuring that there is cross compliance between the grants the Park and its partners award and statutory objectives. I suspect for example that all the estates where illegally killed raptors have been found are in receipt of public monies of one type or another. The CNPA should be able to co-ordinate withdrawal of all public subsidies where landowners are failing to respect the objectives of the National Park.

## Resources

There is no analysis or even estimate of the resources needed to deliver the Park's statutory objectives or the Park Plan. Instead, there are references through the Plan to various pots of money that could be drawn on to meet the specific initiatives that are described in the Plan. There is no analysis of whether this is sufficient or what is really needed. The Park Plan seems to just accept the current Government narratives about austerity and that the National Park and other agencies should still devote considerable effort to scrabbling about try to find funds from wherever. This is very important because without proper resourcing, it's not possible for the National Park to firm up any clear strategic direction, and the Plan is limited to aspirational directions of travel.

## What improvement the CNPA will deliver in the next five years.

The draft Plan refers to some existing targets, contained in other plans, but contains no new ones that I could see. Where aspirations are expressed, such as that in five years time sites protected under European legislation will be in better condition than others in Scotland, there are no firm commitments. On my reading, I am none the wiser of what changes the CNPA is hoping to deliver.

## A comparison with the existing Park Plan

Having drafted this, I was concerned that I was being too critical, because there are some good things in the draft Plan (which I will cover in future posts). I therefore did a comparison between the current 2012-17 Plan <http://cairngorms.co.uk/working-partnership/national-park-partnership-plan/> and the proposed new Plan and found significant changes in approach. Here are three illustrations of this:

- The current plan has five pages on the vision, the new Plan has reduced this to 15 words (which were in the last plan): **“An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together.”** Everything that is visionary, along with the

inspirational photos, has been stripped out. Maybe this is not intentional, maybe the Board and senior staff know the vision so well that they thought there was no need to repeat it again, but for me the lack of visionary statements reinforces the impression that the CNPA has lost its vision.

- The current Plan contains a whole page on landscape qualities of the Park. Its so good, I have appended it below. The contrast with the void in the current plan is striking.
- The current Plan clearly identifies which Partners would be involved in delivering what. Now it wasn't perfect and I regret the omission of recreational organisations and many conservation NGOs from the list of partners BUT the proposed new Plan does not even contain a list of partners. While some organisations may be signed up to some of the other subsidiary plans referred to in the document (its impossible to tell without wading through all those documents too) its not difficult to identify gaping holes: Scottish Natural Heritage for example, does not appear to be included in any of the mechanisms mentioned for moorland and deer management when it has statutory responsibility for Red Deer numbers. If this really is a Partnership Plan should we not know SNH's views about deer numbers in the National Park and what it intends to do about them? You could ask similar questions with all the organisations listed as partners in the current Plan.

The muddled approach in the proposed new plan is summed up for me by this statement on **the Role of the National Park Authority**:

*The purpose of a National Park Authority is to ensure that the National Park aims are collectively achieved in a coordinated way [a quote from S9 of the National Parks Act] This means leading the vision for the National Park and the partnerships necessary for delivery.*

So where is the vision? Who are the partners and what will they do?

## **Addendum – The Cairngorms landscape**

## Summary of the Special Landscape Qualities

<b>The Mountains and Plateaux</b>	<ul style="list-style-type: none"><li>• The unifying presence of the mountains</li><li>• An imposing massif of strong granite</li><li>• The unique plateaux of vast boulder-strewn high ground</li><li>• The surrounding hills</li><li>• The drama of deep corries</li><li>• Exceptional glacial landforms</li><li>• Snowscapes</li></ul>
<b>Moorlands</b>	<ul style="list-style-type: none"><li>• Extensive moorland, linking the mountains to the coast</li><li>• A patchwork of muirburn</li></ul>
<b>Glens and Straths</b>	<ul style="list-style-type: none"><li>• Steep glens and high passes</li><li>• Broad farmed straths</li><li>• Renowned rivers</li><li>• Beautiful lochs</li></ul>
<b>Trees, Woods and Forests</b>	<ul style="list-style-type: none"><li>• Dark and venerable pine forests</li><li>• Light and airy birch woods</li><li>• Parkland and policy woodlands</li><li>• Long association with forest</li></ul>
<b>Wildlife and Nature</b>	<ul style="list-style-type: none"><li>• Dominance of natural landscapes</li><li>• Extensive tracts of natural vegetation</li><li>• Association with iconic animals</li></ul>

## Category

1. Cairngorms

## Tags

1. CNPA
2. conservation
3. grouse moors
4. hill tracks
5. land reform
6. landed estates
7. landscape
8. planning
9. vision for National Parks
10. wild land

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