

The Cairngorms National Park Partnership Plan consultation

Description

The National Park Partnership Plan is a five year plan which sets out the overarching framework for what happens in our National Parks, the contribution of the various public authorities involved and priorities for action. The current plan for the Cairngorms runs out in 2022 and the Cairngorms National Park Authority (CNPA) is in the process of producing a new one. The initial consultation, which started in June ([see here](#) to respond) ends today. Meantime the draft plan is due for publication this week and was considered in secret at the CNPA Board Meeting on 10th September:

CONFIDENTIAL SESSION

Motion to consider following item in confidential session

- | | | |
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| 10 | FOR DECISION
NPPP 2022-2027 Draft for Consultation
<i>Grant Moir, CEO</i>
<i>Gavin Miles, Head of Strategic Planning</i>
<i>Oliver Davies, Head of Communications & Engagement</i> | Paper 5 |
| 11. | AOB | |
| 12. | Date and Venue of Next Meeting
Friday 26 th November 2021 – venue TBC | |

There are reasons therefore to be sceptical about whether *any* contribution to the initial consultation has actually influenced the new plan. Perhaps we would know if the discussion at the CNPA Board Meeting had not taken place in secret. The lack of transparency about how the most important document governing what the CNPA does has been developed hardly inspires confidence [see update at end of post].

The biased initial consultation

That the views of the public don't really matter is also suggested by the way the initial consultation was structured. The CNPA has already decided on the key themes without reference to the existing National Park Partnership Plan:

- People and nature
- Economic recovery

- Achieving net zero
- Local communities
- Visitors to the Park
- A Park for everyone

These themes are both loaded and muddled. Nature or conservation more generally, one of the statutory purposes of the National Park, doesn't get its own theme, whereas outdoor recreation comes under three: People and Nature, Visitors to the Park and A Park for Everyone! Contrast this the current NPPP which has nine priorities, three of which are about conservation: landscape scale conservation, deer management and moorland management.

The implication is the CNPA no longer believes nature matters in its own right. Instead of asking people what they thought about the progress that had been made to tackle existing conservation priorities, or acknowledging the worsening environmental crisis and asking what the CNPA needs to do about this, the initial consultation says "we'd like your views on how people and nature co-exist within the National Park".

If you don't know the answer, you could do worse than look at the progress update from the September Board Meeting on the commitment in the current NPPP to eliminate raptor persecution ([see here](#)):

3e.	Eliminating the illegal killing of raptors through increased wildlife crime enforcement capacity and recognition for good management	Appointment of and assistance to special constables Raptor tracker project	Raptor persecution eliminated/negligible in CNP	Special constables appointed – March 2018. Review March 2019 Wildlife crime raptor tracker developed and tested in 2019	Special constable pilot now completed. Really useful for visitor management but less useful as a tool to combat wildlife crime Software issues have delayed testing of new raptor tracker. Likely to be tested on chicks 2021.	Raptor persecution an ongoing problem in certain areas, including poison Elsewhere, good breeding success among golden eagle & first breeding of sea eagle in Eastern Cairngorms. Red-throated diver harrier breeding confirmed at recent previous locations.
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The sad truth is that people cannot co-exist with nature across much of the National Park as there is almost no nature left. The explanation for this ecological desert is that red grouse, red legged partridge, pheasant and red deer have been promoted for sporting purposes at the expense of other species.

The muddled thinking behind the consultation is illustrated by the themes that cover Outdoor Recreation. On the one hand the CNPA asks under the Visitors to the Park theme:

"What is your view about the number of visitors coming to the National Park at present (c.two million per year)?"

There is no context for this, nothing about the levels of visitors across the National Park or the adequacy of visitor infrastructure, so the question is almost meaningless – though possibly rabble rousing (the number, two million, will be used by those who don't want people on their land). But then, on the other hand, the next theme is all about making the National Park more accessible and the CNPA asks:

“What practical measures would help you and other people explore and enjoy the Park more easily?”

So do the CNPA want more visitors, less visitors or are they hedging their bets?

A second major flaw in the initial consultation is that of the twelve questions asked about the six themes, four are not open-ended but rather ask people to comment on a statement. For example, under People and Nature:

“To what extent do you agree with the following statement: ‘There is a good balance between people and nature within the National Park’?”

People should be wary when they hear public authorities and politicians talking about “balance”. It’s often used as a means of defending the status quo, as in “how can we balance the interests of landowners with those of the public”? Rather than aim for balance, it would have been far less biased if the CNPA had asked separate questions about what it needed to do for nature and what it needed to do for people, as in the last NPPP, and then consider how to resolve any conflicts. The statement itself lumps together everything from local residents walking their dog to muirburn. It invites a totally different answer depending on what issue you are considering. It is not fit for purpose.

Because of these flaws I spent very little time responding to the initial consultation but if you want to do so, there is still time today and you can read my response [here](#).

A better way to comment?

In early September, towards the end of the initial consultation period, the CNPA launched an interactive map ([see here](#)) which allows people to raise the issues that they – rather than the National Park – think matter.

The responses so far are very informative. They include matters such as: low paid jobs in the tourist industry; lack of affordable housing for people working in those low paid jobs; poor services for local communities, from ambulances to recycling centres to broadband; lack of public transport; dangerous sections of road; the poor state of footpaths and lack of walking routes around local communities; lack of tourist infrastructure from toilets to picnic areas etc.

The one area where there have not been very many comments at present is land-management but it appears people have started to get on the case:

Victorian ‘land management’ practices have left our countryside the most deserted in Europe. Scotland’s natural environment is forest and forest is what our planet needs right now. Currently our landscape is barren and devoid of natural flora and fauna, it is a depressing desert and we are killing the ecosystems and the wildlife within it. Shame on us. To promote its current state as beautiful is a crime of our responsibilities to safeguard our planet and its species. Our national parks must make the strongest of leads to work with government and halt this method of ‘land management’ without further delay. We must let trees regenerate and wildlife return, our future depends upon it. Climate emergency. There will be no economy when there is no planet. No planet B.

It seems a shame that the interactive map was not launched earlier so that what people said could

have been used to inform the plan that is due to be published this week. Still, the good thing is it appears the online map consultation may remain open during the formal consultation period and provides a means of people telling the CNPA what really matters. That will provide one way to judge the formal draft NPPP after it is launched this week and may provide the first major test for the new Green Minister for National Parks, Lorna Slater. Watch this space!

Update 24th September

I was delighted to be informed today that the confidential session of the Board to discuss the National Park Partnership Plan has now been made public ([see here](#)). I will comment further in due course.

Category

1. Cairngorms

Tags

1. climate change
2. CNPA
3. conservation
4. Governance
5. landscape
6. Local communities
7. natural environment
8. outdoor recreation
9. Tourism

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Author

nickkempe