

The Highland Council

Badenoch and Strathspey Area Committee
6 September 2016

Agenda Item	9
Report No	BSAC/14/16

Cairngorm National Park Partnership Plan 2017 – 2022
Consultation Response

Report by Director of Development and Infrastructure and Inverness City Area Manager

Summary

The Cairngorms National Park Partnership Plan 2017 – 2022 consultation document has been published for comment. This report advises Members of the main themes in the Draft National Park Plan and will be forwarded to the Cairngorms National Park Authority as the Council's feedback.

1. Background

- 1.1 The National Park Partnership Plan is the National Park Plan required under section 11 of the National Parks (Scotland) Act 2000. The Cairngorms National Park Authority (CNPA) has started work to replace the current Cairngorms National Park Partnership Plan. Consultation is currently underway and responses are invited by 30th September 2016.
- 1.2 Following this consultation, responses will be collated by CNPA and a report of the consultation published. This will be used to further inform a draft Partnership Plan and following any subsequent changes, will be submitted to Scottish Ministers for approval in Spring 2017

2. Cairngorm National Park Plan 2017 - 2022

- 2.1 The Cairngorms National Park Partnership Plan is the statutory management plan that is intended to set out how the aims of the Cairngorms National Park Authority will be delivered across the National Park area.
- 2.2 The National Park Plan has two significant functions: It should provide an agreed vision and strategic framework for what the National Park should become and deliver for the future, as well as a way of focussing available resources to achieve that in a collective and co-ordinated way.
- 2.3 The plan should also coordinate the work and use of resources by the public sector in particular. Although the CNPA prepares the plan, it should be reflective of other public bodies priorities. In addition it requires to be a plan that the private and voluntary sectors, and the community, are involved in

- developing and implementing.
- 2.4 The Highland Council response to the CNPA Park Partnership Plan consultation document is attached at Appendix 1.

4. Implications

- 4.1 There are no Resource, Legal, Equalities, Climate Change / Carbon Clever, Gaelic, Rural or Risk implications in this report.

Recommendation

Members are asked to consider and agree the response to the Cairngorms National Park Partnership Plan consultation 2017 – 2022.

Designation: Stuart Black, Director of Development and Infrastructure and David Haas, Inverness City Area Manager

Date: 26 August 2016

Author: Liz Cowie, Ward Manager, Nairn and Badenoch & Strathspey

Background Papers:

Appendix 1 – Highland Council Response

CAIRNGORMS NATIONAL PARK PARTNERSHIP PLAN 2017 – 2022 DRAFT CONSULTATION RESPONSE

INTRODUCTION

The Highland Council (THC) welcomes the opportunity to comment on the key issues for the Cairngorms National Park Partnership Plan 2017 - 2022.

The Council is in general agreement with the Cairngorm National Park Authority (CNPA) vision and the key long term outcomes of Conservation, Visitor Experience and Rural Development. The Council is also in broad agreement with the main issues that are directly related to each of these outcomes. However we do have a number of comments, observations and concerns and these are reflected under each of these issues and included in general comment below.

It is helpful to reflect on the Partnership Plan at the present time given consideration of local priorities for the Council and therefore opportunities for closer collaboration between our organisations. These priorities are appended to this report.

CONSERVATION

The Council is generally in agreement with the overview of conservation measures (pg. 14 / 15) but would suggest clarification on who is involved in e.g. control of non-invasive species in terms of co-ordinated action, and more detail of the partners involved in building support and enthusiasm for nature.

Issue 1 – Landscape Scale Conservation

The Council broadly welcomes the approach to woodland expansion / management. However our view is that there is a need for an integrated approach to land management i.e. that woodland habitats do not exist in isolation and that there will be overlap with other species, open land, other habitats and land use and with for example, deer, waders, wetlands, grouse moors, recreation etc. As such, early engagement with key stakeholders is vital to identify a clear vision. It would be helpful for CNPA to reference their approach to conflict resolution.

We would also comment that Scottish Land Use Strategy and National Planning Framework 3 should provide a mechanism to guide and inform land use and land management at a both a national and local level.

Issue 2 – Deer and Moorland Management

The Council is generally supportive; however guidance on deer densities is required within the Park, ideally based on carrying capacity of key habitats.

Wider public interest is mentioned with regard to deer management groups. Has this public interest arisen due to consultation? It is not clear what defines public interest. We would be interested in the CNPA definition of this.

The Council would like to see a more environmentally friendly approach to moorland management which continues to support grouse shooting but also allows for habitat and species recovery for example peatlands, woodlands.

Further we would support CNPA reinforcing and monitoring the use of the Muirburn code.

Issue 3 – Flood Management

We would suggest the Issue title is revised to 'Natural' Flood Management, as THC is the Flood Authority with the main role / responsibility towards Flood Risk Management.

In areas where the potential for natural flood management (NFM) has been identified, development plans could be zoned (or constrained) to avoid inappropriate development and promote NFM. There needs to be change in land use guidance and policies that puts more of an emphasis on techniques that work with NFM. Land managers should be encouraged to consider SUDS and NFM, and seek funding from the Environmental Cooperation Action Fund through SNH. There is funding available for progressing NFM on a catchment scale. There is also funding available through SRDP.

Catchment management partnerships (CMP's) could take an even greater educational role in liaising with land owners / managers to promote NFM. Discussion with landowners on how NFM techniques can work alongside their current working practices, or how small adaptations to current working practices can have a benefit to catchment areas would be beneficial. CMP's can liaise with Local Authorities to help deliver the actions within Local Flood Risk Management Plans, and can also seek opportunities from infrastructure development in the area.

We would therefore ask what the CNPA sees as their role as in NFM initiatives and would welcome the opportunity to work in combining approaches where appropriate.

VISITOR EXPERIENCE

We broadly agree with what is outlined as all partners work to deliver Tourism Scotland 2020, the national tourism strategy. THC view is that mechanisms for delivery have to be dynamic and ambitious, particularly in the context of Ward 21 and its communities.

The Council agrees with the aim of enhancing the quality of the Park as a tourism destination and also agrees with the points made about infrastructure. However quality is also dependent on the actual businesses and people involved, and there is a need to provide support, and to invest in these areas, with partnership approaches.

Issue 4 – Visitor Infrastructure and Information

The Council supports finding innovative solutions to ensure continued provision of services and quality of experience for visitors. While investment is welcome where possible, there are also instances where even with capital investment, issues over ongoing costs will remain. The provision of public toilets is one example where innovative solutions and shared services that create private sector opportunities should be explored.

A key delivery mechanism for the visitor experience is the use of Countryside Rangers. We understand that changes are underway across the Park regarding how these services are to be delivered. However we feel that reducing CNPA financial input into the existing experienced HC Ranger service has been counterproductive, resulting in reduced hours available, and affecting partnership working. Delivering a consistent high quality visitor welcome through new and improved information and ranger

services, as well as partnership working to support businesses and visitor attractions, is vital.

The Council believes that there should be stronger emphasis on the Scottish Outdoor Access Code and initiatives promoting responsible access across the Park.

Issue 5 – Active Cairngorms

The Council is broadly supportive of what is outlined and will continue to support the development of community recreation opportunities and facilities that compliment this.

The CNPA is looking in the right places to increase activity levels. Whilst having increased visitor numbers, most visitors are motivated to be active in order to explore the Park. More of a challenge may be among residents and targeted effort at this group should be considered through local initiatives and partnership working.

CNPA is ideally placed to further promote / support a broader one stop shop approach for volunteering opportunities within the Park and existing frameworks could be built on.

Issue 6 – Learning and Inclusion

The Council's view is that there is scope for inclusion of detail on partnership working with Local Authorities in this section.

With regard to children across Scotland having the opportunity to visit and learn from being in the Cairngorms National Park, an early target could be to focus, promote and subsidise school visits to the Park areas within an easy days travel. Consideration also to be given to further development of web based resources.

In terms of under-represented groups visiting and experiencing the National Park, again an experienced Ranger service is vital to providing environmental education. Investment should be reconsidered / increased. Marketing and targeting relevant web based information and material to underrepresented groups is also a possibility.

Engaging more people across Scotland in making the most of the Cairngorms National Park through learning and recreation is an admirable goal and it is true that the Park is a national resource. Consideration should be given to whether there is the right balance between supporting those living and working within the Park area and those who come to visit.

RURAL DEVELOPMENT

The Council believes there is an opportunity to include more 'Localism' language in this outcome. Consideration should also be given to reordering the housing challenges outlined on page 39 to give greater weight and emphasis to the second bullet point.

The Council welcomes the proposal to identify a new Spatial Priority area for the South Badenoch area to include Kingussie, Newtonmore, Laggan and Dalwhinnie. However it is our view that a stronger directional statement on partnership approaches could be included with regard to deliver the Economic Strategy on page 39

Issue 7 – Housing

The Council welcomes the focus on housing provision throughout the consultation document and would support continued dialogue and focus on this major issue.

Affordable housing is recognised as a main priority. More sites could be zoned in priority areas. Initial feasibilities should also be carried out to ensure sites are economically deliverable. Once a site is zoned, presumption should be for the Development Planning process to be as quick as possible to attract developers to the area. Minimum density levels would assist in the delivery of more affordable homes rather than high value / low density.

The reduction of second home ownership is a complex area with legal, commercial and economic implications. If use is restricted, the commercial viability of housing development is also restricted which may mean developers will work elsewhere. The main issue is to increase allocation of housing land to allow both affordable and open market (including second and holiday) homes to be developed

In terms of making best use of existing land supply, an option could be to consider increasing the percentage of affordable homes from 25 % to 50 %, but equally this could have a negative impact on the commercial viability of sites.

Issue 8 – Community Capacity and Empowerment

The Council would welcome more co-ordinated approaches to community development. Many communities are able to access appropriate and high quality support through organisations such as Voluntary Action Badenoch Strathspey. However there is a need to engage a broader range of community members in the planning and design of support mechanisms alongside a coordinated range of support services from the full range of agencies and organisations involved in the sector. Agencies are required through The Requirements for Community Learning and Development (Scotland) Regulations 2013 to:

- identify target individuals and groups
- consider the needs of those target individuals and groups for CLD
- assess the degree to which those needs are already being met
- identify barriers to the adequate and efficient provision of relevant CLD.

Highland has created both area Community Partnerships and within each area, CLD Partnerships, to facilitate this process. It would be appropriate for the work of CNPA around this issue to be planned within, and as part of, these structures and their planning framework so that priorities are aligned.

In terms of communities being supported to maximise the opportunities provided by the Community Empowerment Act and Land Reform Act, it is important that communities are fully involved in assessing their needs and agreeing the outcomes that are appropriate to their locality. An important element of the support required to assist communities to engage with agencies on equal terms involves agencies changing established approaches so that we move from consultation to engagement. Communities will require support to participate in terms of training, information, funding and encouragement. The range of provisions in the legislation offer communities powerful tools to engage and take control of agendas and assets. It is important that

they are supported to do this and sustain it. A key element in making progress toward strong communities is tackling socio-economic inequalities. The partners named in the Community Empowerment Act, including the CNPA, will be required to develop a clear and coherent strategy and commitment to do this. This should involve the use of shared data with partners. This should also involve targeting distinct communities and groupings to ensure they can participate in ongoing engagement and the activities offered by CNPA and its public, voluntary and private sector partners.

The Council believes that more use of collaborative language and phraseology is required within this section of the plan, particularly around the mechanisms for delivery, thereby reflecting the partnership approach which is critical to achieving improved outcomes for communities.

Issue 9 – Economic Development

The Council views this as a key priority area for Ward 21. Investment and improvement to infrastructures is vital to support economic opportunity and growth. However there is broad agreement for what is outlined.

In addition to the core support provided to the business community via the Cairngorm Business Partnership other support comes from THC main business development services, namely Business Gateway, business loans, Graduate Placement Grants, Employment Grants.

There are wider arguments for infrastructure investment in the Park area and in particular in Ward 21. Opportunities should therefore be sought to work proactively with key partners such as HIE to develop specific targeted strategies and to further build on the policies outlined at policy direction 1.1.

A discussion would be welcome on review of key infrastructure projects and consideration of others that could be included.

ADDITIONAL AREAS FOR CONSIDERATION

Capital Investment Priorities / Delivery Mechanisms

The Council recognises the capital investment priorities for the area. However it is suggested that a review of the delivery mechanisms is required to ensure that these reflect not only the groups that the CNPA brings together, but also those that the CNPA is involved in that are led by other organisations. Detail is required on who is leading on specific priorities.

Annex – Proposed Policies

The Council is generally in agreement with the proposed policies and in particular, welcome the policy directions on housing. However in respect of policy direction 3.4, given the range of organisations involved who contribute to the Curriculum for Excellence, we suggest this should read 'opportunities to support the delivery of the Curriculum for Excellence' to demonstrate the collaborative approach for this national outcome.

General Comment

The Council is in agreement with general headings but would seek more clarity around partnerships and the conservation vs economic development dichotomy.

Some of the language and phraseology throughout should be reflected on as it could be considered to be unhelpful in a partnership context as it implies that the CNPA guides the work of other organisations (e.g. pg. 5). It is perhaps more helpful to say that the plan guides the work of the CNPA and the issues that it wishes to work with partners on. The Partnership Plan should fully reflect partnership and collaborative working.

With regard to the role of CNPA and ways of working, the Council asks who CNPA sees as the key partners and are these partners different from e.g. Community Planning Partners (pg. 8). With reference to delivery of simpler, more effective and better value public services in the National Park (also pg. 8), we would ask what the CNPA vision is around this and how CNPA see this being delivered.

It is clear that the availability of housing continues to be a key concern and priority for communities, as is highlighted throughout this response. The Council would like to see a clearer message included in the Partnership Plan around people living and working in the National Park and how balance can be achieved to ensure that in Outcome 3, there is a sustainable economy supporting businesses and communities, so that this outcome is actually supported by a thriving community who can live in the Park.

The Council would also comment on the impact of the loss of EU funds and the impact on the CNPA. The importance of agriculture to upland management and the loss of agri-environment funds and programmes like LEADER could have serious implications for the landscape and for community development respectively.

CONCLUSION

The Highland Council continues to work with the Cairngorms National Park Authority to strengthen links and partnership working to deliver for the Ward 21 communities within the CNPA area. The Council is also keen to explore new opportunities to build on and further develop broader delivery partnerships.

THC would welcome further opportunity to discuss this response if required.

Appendix 1 – Badenoch & Strathspey Area Priorities