

Cairngorms National Park Partnership Plan 2022-2027

7 January 2021

Introduction to the John Muir Trust

The John Muir Trust is a community focused conservation charity dedicated to the experience, protection and repair of wild places across the UK. Founded in 1983, we care for some of the finest wild places in the UK, including Ben Nevis, Helvellyn and Sandwood Bay. Alongside communities nationwide, we work to inspire greater involvement in wild nature, and over 25,000 members, supporters and partners contribute to our work. We campaign to protect wild places and speak up for their benefits, and we repair and rewild land in our care for the common good.

Consultation response

The John Muir Trust is pleased to respond to the consultation on the Cairngorms National Park Partnership Plan 2022-2027. Overall, there is much that we welcome and endorse in the draft plan, and we commend the National Park for demonstrating how land managers can act to mitigate the impacts of the ongoing climate and biodiversity crisis in Scotland. Based on our remit, we have commented below on selected issues, which are of particular relevance to us as a conservation organisation and a landowner in Scotland.

To what extent do you agree or disagree that these are the right objectives and targets for the National Park?

Strongly agree.

Why do you say that?

We support and endorse the general direction of the plan and its identified priorities, and we very much welcome the importance placed on addressing the twin biodiversity and climate crisis. We would, however, encourage the Cairngorms National Park to push for ambition. In the context of the nature and climate emergency, we need to set progressive targets in order to halt climate change and reverse the loss of biodiversity. The Cairngorms National Park has a unique opportunity to establish itself as a leader and an exemplar in delivering effective action and demonstrating how progress can be made. Positive action also has the potential to deliver sustainable and high-quality jobs, as well as building resilient communities, which provides a strong mandate for upping ambition and increasing the speed of change.

Is there anything missing from the above list that you think we should prioritise?

The Cairngorms National Park has a significant potential to lead on nature-based solutions to the twin biodiversity and climate crisis and become a net carbon sink, as a direct result of how land is managed in the park. We currently do not know what the future holds for agricultural and farm subsidies, and we do not yet have a clear strategy for biodiversity. These policy gaps could be an opportunity for the Cairngorms National Park Partnership Plan to show leadership.

To what extent do you agree or disagree with the overall outcome for nature we have proposed?

We strongly agree with the overall outcome for a carbon negative and biodiversity rich National Park with better functioning, better connected and more resilient ecosystems.

Do you have any other comments?

Thank you for consulting the John Muir Trust on the draft Cairngorms National Park Partnership Plan 2022-2027 and for extending the response deadline. Our detailed comments are included below.

Nature

A1 – Ensure the Cairngorms National Park reaches net zero by 2045 at the latest and contributes all it can to helping Scotland meet its net zero commitments.

While we support the objective to contribute to helping Scotland meet its net zero commitments, we would encourage the National Park to be more ambitious. Not only does the aim to achieve net zero by 2045 fail to reflect the urgency with which climate change must be tackled, it also fails to reflect the considerable potential for carbon sequestration within the National Park, e.g. through peatland restoration and native woodland expansion. This potential is greater than in many other parts of Scotland – the Cairngorms National Park should therefore be more ambitious and aim to achieve net zero before 2045 and be carbon negative by 2045.

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.

We welcome this objective, especially the commitment to the expansion of native woodland through natural regeneration and the reduction of deer numbers, which is preferable to tree planting and fencing. However, if the woodland target is to be met, deer densities in the National Park need to be lowered drastically and should be well below the proposed 5-8 per square kilometres (cf. A4). We would also recommend that objective A2 emphasises the importance of woodland restoration and improved management of existing woodlands in order to benefit biodiversity and carbon. Scotland's forests need to become more resilient to disease, severe weather and longer-term climate change, and forests with mixed trees and healthy components of native species will be more resilient to future threats. Such an approach would benefit biodiversity, make woodland more attractive places for recreational pursuits and improve ecosystem services such as soil conditions and water quality.

A3 – Restore and manage peatland within the National Park to reduce carbon emissions and improve biodiversity.

We strongly support the peatland restoration target, which is also an opportunity for both skills development and job creation within the National Park. We would, however, urge the National Park to increase its target area for restoration, given that 15% of Scotland's peatlands are located within the park. The target to restore a minimum of 6,500ha within the next 5 years is a minor increase from the 5,000ha target in the previous park plan from 2017-2022, and we would therefore urge the National Park to be more ambitious. Increasing the target would also help the National Park realise its aim to become net zero and carbon negative before 2045.

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 this objective, but we strongly maintain that the deer density target needs to be lowered to 2-3 per square kilometre, rather than the stated 5-8 per square kilometre. At the very least, the density target needs to be under 5 per square kilometre if we are to enable significant natural regeneration and the expansion of native woodland. We recognise that red deer are a natural part of the National Park, but at high densities they can have severely detrimental impacts on vegetation, including tree regeneration, peatlands and other sensitive habitats. We therefore urge the National Park to set a more ambitious target for the reduction of deer numbers. With ambitious deer management targets, there will need to be more skilled stalkers in the National Park, which would create job opportunities for local communities.

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.

We welcome this objective, which aligns with the Scottish Government's announcement in November 2020 to introduce a new licencing scheme for grouse moors, accompanied by a new Code of Practice, within the next five years. A new licencing scheme would aim to protect wildlife and habitats on grouse moors by prohibiting or restricting certain activities and increasing reporting and monitoring of grouse moor operations.

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.

We welcome this objective, which is consistent with the Scottish Government's intention to introduce a ban on muirburn on deep peat (as part of new licencing scheme for grouse moors), as action required to tackle the biodiversity and climate emergency and deliver the Scottish Government's commitments to restore damaged peatlands. We would, however, emphasise that all muirburn should require licencing, including burning for agricultural purposes, and that this should be clearly set out in the plan.

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.

We welcome this objective and the aim to put in place carbon and biodiversity management plans. However, we would suggest working with all land managers within the National Park to reduce their carbon footprint and create carbon and biodiversity plans, rather than just focussing on farmers.

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.

Funding to support farmers and crofters to take action to reduce carbon emissions and enhance biodiversity should be a core aspect of how Scotland addresses the climate and nature emergency. We therefore welcome this objective and the development of a Regional Land Use Partnership and Framework as a means of delivery. Rural publicly funded payments should deliver public goods, including biodiversity restoration, climate mitigation and improved access via paths and other infrastructure for outdoor recreation, and any influence the National Park can have on the design of future rural payment schemes would be welcomed.

A9 – Restore and connect rivers to thriving wetlands and floodplains as part of wider restoration of the National Park’s freshwater systems, helping to mitigate the impacts of climate change.

We support this objective, which would generate wider environmental and socio-economic benefits through e.g. carbon sequestration, recreational opportunities, wildlife habitats, and improved water quality. Restoring river systems would also increase natural storage capacity and reduce the risk of flooding, thus lowering the financial investment needed to tackle downstream flood damage.

A10 – Connect habitats and ecosystems across all different types of land use in the National Park to create an ecological network, which will bring wider landscape, biodiversity and people benefits.

We welcome this objective but would suggest emphasising and including areas of high wildness in the spatial planning for ecological connectivity. Overall, we would like to see the draft plan include a greater recognition of and emphasis on wild places and wild land – these are assets for realising long term ecological restoration. Additionally, we believe that there is a role for the Cairngorms National Park to introduce incentives for nature recovery and ecosystem restoration, e.g. through public recognition of land managers and partners who are creating nature networks or through data transparency for farmland carbon and biodiversity audits. Furthermore, we recommend that the plan includes a requirement for developments within the National Park to contribute to the Park’s ecological network and deliver ‘net biodiversity gain’.

A11 – Enhance ecosystems across the National Park by increasing the area of land managed principally for their restoration.

We support this objective, and we welcome the commitment to “ecosystem restoration”. We are, however, disappointed to see that there is no target for 2027 for this objective. It would be beneficial to set interim targets in order to work towards achieving the 50% by 2045 target.

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.

We welcome this objective and commend the Cairngorms National Park for taking the lead and demonstrating good practice in terms of monitoring species, habitats and ecosystems.

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.

We support this objective but would recommend that the National Park introduces measures to recognise sites of particularly high wildness and natural value and identifies opportunities to establish appropriate land management incentives and other means to help ensure the value of these sites. Overall, we would like to see the draft plan include a greater recognition of and emphasis on wild places and wild land, which do not have any statutory protection but have been acknowledged as nationally important under existing National Planning Policies and wild land continues to be recognised in the draft Fourth National Planning Framework.

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.

We strongly support this objective and the action to apply Scottish Government Policy to facilitate species re-introduction. We also support the action to “reduce wildlife crime”, although we believe this target should be broken down into clearer action. We support the establishment of a Cairngorms National Park Authority-led partnership raptor project with the aim of increasing monitoring, on the ground presence and intelligence sharing, as well as landowner liaison. Targeted staff resources is required from the Cairngorms National Park Authority to address this, and condemnation of wildlife crime should be consistent.

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.

We welcome this objective. A combination of public, private and third sector investment is needed to address the biodiversity and climate crisis, and we welcome the fact that the Cairngorms National Park Authority is looking to enable and encourage increased private sector investment in nature. That being said, we are concerned that green finance is currently skewed towards tree planting of a limited number of species, and that it does not always drive appropriate land management. There is a need to steer green finance towards carbon and biodiversity projects, which also demonstrate community benefits and does not lead to higher land prices or the exclusion of communities from decisions about the way land is owned and managed. We would suggest that the National Park acts to ensure that this emerging market is used to deliver public benefits.

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.

We support this objective and urge the National Park to monitor how nature-based solutions are delivering clear and positive impacts for nature, climate and local communities, in order to avoid any form of greenwashing.

A17 – Ensure a wider range of people are involved in, benefit from and support activities that protect and enhance nature and tackle climate change in the National Park.

We support this objective.

People

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 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 to reduce waste and our wider impact on the environment.

We welcome this objective, particularly the emphasis on year-round employment and well-being for communities across the National Park. Further to this, we would suggest extending the tourist season beyond the busy summer months, which would help secure year-round employment rather than just seasonal jobs, while also helping to spread out visitor impacts.

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 welcome this objective and encourage support for apprenticeship schemes within the National Park, particularly for young people. In addition to creating opportunities, the National Park with its partners, should keep in mind the barriers young people face to accessing opportunities. Reducing these barriers is an important consideration for widening opportunity and increasing the likelihood that every young person in the park can consider a future of living and working there. Informal learning opportunities, which perhaps more landowners and managers could provide with guidance and support from the National Park Partners, are valuable for gaining foundation skills which then support development into formal training pathways.

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.

We support the objective to increase the area of land that is in community ownership, or where the community is directly involved in its management.

B11 – Help improve the mental and physical health of the people of the National Park.

We support this objective, but we would recommend including an emphasis on people's connection to nature and wild places, as research has shown how beneficial nature is for people's mental and physical health and wellbeing.

B12 – The visitor profile to the National Park will be more diverse, with a greater proportion of visitors from disabled groups, lower socio-economic backgrounds and minority and ethnic groups. Targeted support will be provided to programmes and projects that reduce inequalities for residents and visitors alike and help to make the Cairngorms 'a Park for All'.

We strongly support this objective. The John Muir Trust is developing its own Equality, Diversity and Inclusion (EDI) action plan that will be implemented through a “Wild Places for All” programme, which aims to support people from all walks of life to experience wild places. We would be pleased to work together with the Cairngorms National Park on achieving and delivering this objective.

B13 – Engage with people across the National Park through formal and informal education, increase the number of volunteer days spent caring for the National Park, and ensure that young people have a significant role in helping to manage the National Park.

We strongly support this objective and welcome the reference to the John Muir Award, as well as the emphasis on the importance of nature connection and conservation learning opportunities. This objective complements B5 and we suggest the Park Partnership pro-actively identifies and supports pathways from formal and informal education to skills and training opportunities within the park.

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.

We welcome this objective but would recommend that unsustainable pressure on biodiversity and wild places from growing visitor numbers (in some areas) should also be referenced in the ‘why are we proposing this objective?’ section.

C2. Secure the National Park’s place as an international exemplar in sustainable tourism and the management of protected areas.

We strongly support this objective. In March 2021, the Trust published a report on “Frontline realities: rural communities and visitor pressures”, which documents visitor pressures experienced by local people living in some of Scotland’s remote and popular destinations in Highland Perthshire, Lochaber, Skye, Lewis, Harris, Assynt and Northwest Sutherland. The report contains recommended actions for Local Authorities, Scottish Government, local communities, Visit Scotland as well as the John Muir Trust. One of the recommendations for Local Authorities is “the creation of Destination Management Plans that put local communities at the heart of tourism developments and balance community, environmental, and economic impacts and benefits”. Supporting communities or partnerships to create Destination Management Plans for tourist hotspots within the park could be part of the National Park’s strategy for managing tourism sustainably. The full report is available at: https://www.johnmuirtrust.org/assets/000/001/444/Visitor_Management_Report_09.03.2021_final_lr_original.pdf

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

We support this objective. There are many examples from across Europe, where public transport is used by visitors to access remote areas and tourist destinations, and the Cairngorms National Park can draw inspiration from this international experience.

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

We strongly support this objective. The Trust's 'Wild Land Management Standards' on 'facilities and heritage' could help to inform sensitive approaches to creating and improving path, cycle and access networks in the Park. Please see our Wild Land Management Standards webpages for more information: <http://www.wildlandmanagement.org.uk/management-standards/facilities-heritage>

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.

We support this objective but would recommend including a target for low-cost camping options within the National Park, in addition to campervan facilities. Over the last couple of years, we have seen an increase in inappropriate roadside camping, which has led to negative impacts on both local communities and the natural environment. The trend indicates that there is a need for pop-up campsites with minimal facilities during busy weekends and the peak tourist season.

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.

We support this objective. The Trust's 'Wild Land Management Standards', particularly those on 'facilities and heritage' and 'communities and visitors' could help to inform sensitive approaches to enabling access to the Park's wild places. Please see our Wild Land Management Standards webpages for more information: <http://www.wildlandmanagement.org.uk/>.

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