

Agenda Item	<b>3</b>
Report No	<b>BSAC/21/21</b>

## HIGHLAND COUNCIL

**Committee:** **Badenoch and Strathspey Area Committee**

**Date:** **21 December 2021**

**Report Title:** **Cairngorms National Park Partnership Plan – Highland Council Response**

**Report By:** **Executive Chief Officer, Performance and Governance**

### 1. **Purpose/Executive Summary**

- 1.1 This report and appendix provides a draft response to the Cairngorms National Park Partnership Plan consultation.

### 2. **Recommendations**

Members are asked to agree the Council's submission at **Appendix 1**.

### 3. **Implications**

- 3.1 Resource - There are no direct implications for the Council as a consequence of this report.
- 3.3 Community (Equality, Poverty and Rural) – there will be many impacts on the local communities in the Park Authority area. The equality impact assessment undertaken for the draft Plan focuses on the potential impact of the Partnership Plan in relation to the National Park's communities, residents and visitors, as well as stakeholders, investors and the business community. Specifically, it focuses on groups with protected characteristics under the Equality Act 2010. The Park Authority has also provided a fact sheets on population and housing and on the economy to inform consideration of the draft Plan.

3.4 Climate Change / Carbon Clever – there is a strong emphasis in the Plan on climate and the environment and the Council's Climate Change team has reviewed the draft plan and responded to the relevant questions. The Park Authority has undertaken a Strategic Environmental Assessment and provided a range of fact sheets on climate change, conservation, landscape and heritage to inform consideration of the draft Plan.

3.6 Risk, Legal, Gaelic. There are no direct implications as a consequence of this report.

#### **4. Overview**

4.1 The Cairngorms is the UK's largest national park at 4,528 sq km (6% of Scotland's land mass) and is home to one-quarter of the UK's rare and endangered species. Around 18,000 people live in the Park across the areas of Aberdeenshire, Angus, Highland, Moray, Perth and Kinross, and the Park hosts two million visitors every year.

The National Park has four distinct aims as set out by Parliament:

- To conserve and enhance the natural and cultural heritage of the area.
- To promote sustainable use of the natural resources of the area.
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public
- To promote sustainable economic and social development of the area's communities.

The National Park Partnership Plan is intended to set out how all those with a responsibility for the Park will co-ordinate their work to tackle the most important issues.

4.5 The consultation is divided into three sections: Nature; People; and Place. Each section includes long-term objectives up to 2045 (the year Scottish Government has committed to achieving net zero), which are supported by a set of policies for the next five years. The Partnership Plan is in turn underpinned by a series of action plans. The draft Partnership Plan is available online at <https://cairngormsviews.commonplace.is/>

#### **5. Engagement Process**

The Council has been involved in the pre consultation phase with officers attending a number of partnership meetings held to discuss the drafting of the Plan which in turn were informed by informal engagement with local Members. The Cairngorm National Park Authority also presented the draft Partnership Plan at the last meeting of the Area Committee, where it was well received. Alongside this, officers from across a number of Council departments have worked through the draft Plan and associated questions to produce the attached proposed formal response.

## **6. Next Steps**

- 6.1 The closing date for the consultation is 17 December 2021 but this has been extended to enable the Council to submit a formal response via a special meeting of the Badenoch and Strathspey Area Committee.

Designation: Executive Chief Officer –

Date: 13 December 2021

Author: Kate Lackie

### **CNPA Consultation responses: HIGHLAND COUNCIL**

The Highland Council welcomes the opportunity to respond formally to the Cairngorm National Park Partnership Plan. In preparing this response, the Highland Council has been able to engage with the pre-consultation phase and is grateful for the opportunity to help form the development of the Plan.

Whilst there are some detailed responses to the specific questions raised in the consultation itself, the Council first wants to acknowledge the extensive engagement undertaken by the Park Authority; the comprehensive nature of the plan; and the strong vision and ambition for the area that this presents. The Council remains committed to working in partnership with the Cairngorm National Park Authority to make this area one of the best places to live, work and visit; and to restate our joint commitment to sustaining it into the future.

Before turning to the specific questions in the Partnership Plan consultation there are a few more general of points that the Council would like to set out and which do not obviously fit anywhere else. These are provided below, following which the Council's response is set out according the questions in each of the consultation's themes and headings.

#### **General comments**

There are many interconnecting priorities between all three headings of Nature, People and Place – for example - the priorities related to stabilising population and sustaining the young population which relate to the provision of housing etc under the place theme. Consequently, it will be important to ensure that these inter-relationships are picked up in the implementation and operation of the Plan.

The focus on housing is welcome and entirely appropriate as one of the most important priorities for the area. However, in addition to affordable housing there needs first to be available housing and so looking at how to increase and protect availability of housing should also be given prominence.

In terms of the capital strategy, the Plan could take greater cognisance of the relationship with adjoining geographic areas. This is particularly true in the case of the major communications corridors running through the Park and which link to adjoining centres in Highland (and Moray) with the central belt. In terms of capital investment, it is unclear what major investments are planned within the Park from the Draft NPPP. If there is more within the CNPA's Action Programme for the Cairngorms National Park Local Development Plan that is sufficiently strategic or 'key' it may be worth including in the Plan as well.

Lastly, throughout the plan, where there are targets – for example the increase in trees or amount of peatland restored - it would be helpful to include baseline data where it exists and if it doesn't, then this should be stated. In the case of the indicators for game bird management, it is not entirely clear whether the intention is to gather baseline data or is it to increase/reduce numbers so clarification here would be helpful.

## Nature

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

Broadly agree with the objectives and targets for the National Park. They are comprehensive that are both relevant and current and set out a basis for planning targeted action with the right people and the right organisations. Objective A17 brings in the broader context for working with communities and communities of interest.

**Is there anything missing from the list of objectives that you think we should prioritise?**

**Objective A2** – 35,000ha of predominantly native woodland creation by 2045 is a positive and ambitious target and this is very much welcomed by the Highland Council. It is however important to also recognise within the Plan the prime importance of retaining and safeguarding *existing* woodland resources in relation to protection of habitats, biodiversity, carbon storage/ sequestration as well as wider public health and wellbeing benefits associated with woodlands.

**Objective A2** – Wherever possible, the use of biodegradable tree shields should be prioritised over plastic shields.

**Objective A16** – this should mention the need to minimise degradation of woodland through livestock overgrazing.

**Objective A7** – The ambition of reducing the carbon footprint of farming is the right ambition, but it should be recognised that some farms will struggle to reach net zero using existing technology and farming methods. Perhaps this objective could include language around a landscape approach, which makes it clear that individual farms can contribute to a net zero landscape without achieving it themselves?

**Objective A8** – the targeting of rural payments in this way is particularly welcome and the Highland Council is keen to work with CNPA in the proposed Regional Land Use Partnership. It would be very helpful to target action around land provision for community food growing. This would have wider economic, environmental and health and wellbeing outcomes.

**To what extent do you agree or disagree with the overall outcomes for nature, people and place we have proposed?**

Overall, the Council agrees with the outcomes reflected.

**Do you have any other comments?**

**Objective A1** – 2045 is the date identified as the *latest* the CNP will reach net zero. This is in line with, but not exceeding, national targets. Might a future revision include an interim target for a well-defined “low-carbon Cairngorms”, or perhaps a ratcheting up of the net zero ambition to “2040/2035 at the latest”?

**Objective A11** - Could this objective refer to land ownership? The aim of 50% of land being managed primarily for ecosystem restoration is desirable, but this land use is often more easily pursued by landowners who do not need to make income from all their land. Could this objective perhaps reference how subsidies/other support might allow smaller landowners to manage their land for ecosystem restoration *and* for income?

## People

<b>To what extent do you agree or disagree that these are the right objectives and targets for the National Park and why?</b>
The Highland Council agrees that these objectives provide a comprehensive framework to take forward the 'People' objectives.
<b>Is there anything missing from the list of objectives that you think we should prioritise?</b>
<b>Objective's B1 and B2.</b> Could both objectives reflect the excellent partnership work that is already in place by, for example, reading 'Work with partners' to ensure the resident population etc. 'Work with partners to stabilise or increase etc. Particularly as partnership working is reflected so well in the Actions Section.
<b>Objective B1.</b> Noting that the objective in B2 is to 'increase the proportion of young people and working age people in the National Park', could the same objective be included in B1 in order that the resident population not only stabilises, but also increases?
<b>B5 –</b> This objective refers to a skills shortage which affects all parts of Highland. Partnership working across Highland, with new training courses and the expansion of existing training courses for young people seeking work with rural employers should be highlighted.
<p><b>B7, 8 and 9 –</b> the objectives to increase community participation and involvement in ownership and community led priorities are very welcome. There are potentially two missing aspects however:</p> <ul style="list-style-type: none"> <li>- community capacity building and working with partners to achieve this which is essential to support and enable these objectives.</li> <li>- community led local development priorities. This is an important aspect and fits with the wider place principle approach and a further element to this is how this links with CNPA priority setting.</li> </ul> <p>Therefore, the Council would welcome the inclusion of a reference to increasing involvement in the shaping of CNPA service planning, design and decision making. There could also be a stronger message about the interlinking elements between this section and that of place i.e. community priorities etc are shaped round their sense of place.</p>
<b>To what extent do you agree or disagree with the overall outcomes for nature, people and place we have proposed?</b>
The Highland Council agrees overall with the outcomes reflected.
<b>Do you have any other comments?</b>
Is there an opportunity to consider individual business sectors (e.g. niche businesses) and how growth and diversification could be supported particularly with the provision of fibre/superfast broadband.
In the Actions Section at B6, B7, B8, B9 – can Local Authorities be included in the list of partners given the partnership working that is already in place with e.g. Community Action Plans in Badenoch & Strathspey?

**Place**

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

The Highland Council agrees that these provide a comprehensive framework to take forward the 'Place' objectives

**Is there anything missing from the list of objectives that you think we should prioritise?**

**Objective C6, C7** – the Highland Council welcomes the inclusion of these objectives in the Plan. A reporting mechanism for notifying the relevant authorities of damage or chance finds from erosion should be put into place for historic environment assets.

In the Actions Section at A1, C3, C4 is there scope for including community transport groups such as the Badenoch & Strathspey Community Transport Forum (and also other such community transport groups if they are active in other local authority areas)?

**To what extent do you agree or disagree with the overall outcomes for nature, people and place we have proposed?**

The Highland Council agrees overall with the outcomes reflected.

## Actions and policies:

### Have you got any comments on the actions or policies we have proposed?

**General:** Is there opportunity, in light of the pandemic, to include contingency planning for businesses in light of events that may impact on the economy, economic recovery?

#### Actions (2022 – 2027)

**A2** – it is noted that the Park will *‘Work with land managers to ensure existing woodlands are managed for a range of benefits including timber production, public access, biodiversity etc.’*

A2 would also benefit from a commitment (or separate policy, as part of Policy A2) to provide protection and enhancement of existing trees and woodland from threats, including development, especially where that resource is designated (i.e. as Tree Preservation Orders or is listed in the Ancient Woodland Inventory). We would like to see a presumption against any activity that degrades, damages or negatively affects these important woodland habitats.

**Action B1 and B2** – needs to also reflect delivery of locality planning and local place plans

**Action B3** - The historic environment should be included alongside natural heritage in the evidence base as this also makes a tangible contribution to the local economy. For example, Ruthven Barracks and the historic planned town of Grantown-on-Spey.

**Action B6-9** – should also include the Local Authority as a partner.

#### Policies 2022-2027

The ambitions set out in Policy A1-A6 are welcome and set a positive direction for the Partnership Plan. It would, however, be useful to include more detail on the policies, including (for example) how they will be delivered, and by stating which species are most important in the National Park etc.

**Policy C3** – We recommend the addition of a statement that acknowledges that all new development will preserve and enhance the character and appearance of the National Park’s Conservation Areas.

**Policy C3(4)** – We welcome the intention to retain and enhance local character. However, this policy should be extended to include the rehabilitation of redundant historic buildings in any setting, not just those located in rural areas. This would not only help protect the National Park’s sense of place, but it would also ensure existing carbon reservoirs within the fabric of historic buildings are not lost with the resulting negative contribution to climate change.

**Policy C4(1)** – the policy should also include managing the effects of visitor numbers on the historic environment/cultural heritage. It is recommended that the wording is changed to include ‘...pressures on natural *and cultural* heritage...’

**Policy C6** – This policy is welcome. However, it is noted that there are currently no formal mechanisms in place (outwith development management) for providing historic environment advice or input to the Park. We feel there are opportunities to strengthen our partnership in this regard to help improve recognition and protection of the historic environment. The Highland Council would welcome discussion on how this could be achieved.



**Policy C6(2)** – It is important to recognise a link between C6(2) and peatland restoration.  
**Policy C6(3)** – This should include reference to protecting and enhancing Inventory Battlefields (specifically Battle of Cromdale, to the east of Grantown).

**Factsheet NPPP 2022 Landscape and Cultural Heritage**

There is an outdated reference to the Royal Commission on Ancient and Historical Monuments of Scotland. The further information section should include a link to local authorities online Historic Environment Records. For the Highland section of the Park, this can be found at <https://her.highland.gov.uk>.

Although the Plan has a number of policies that directly relate to cultural heritage and the historic environment, we feel that the historic environment would benefit from a more detailed and wider consideration. There is, for example, no indication of the scale of the historic environment's contribution to the National Park, and this is further reflected by the absence of reference, for example, to ensuring sustainable peatland restoration or woodland creation through minimising impacts on historic assets. Whilst we accept that, in the context of a climate and ecological emergency, the natural environment may be reasonably prioritised, this should not be at the expense of, or lessen the important role that the historic environment plays in relation to nature, people and place.

There are opportunities to further develop partnership working with key partners, including local authorities and local authority specialists that provide advice to the National Park. Furthermore, there are opportunities to realise joint benefits from projects and policy development work, especially where that work could take place across administrative boundaries. To this end the Highland Council would welcome a regular National Park/Local Authority liaison meeting focused on matters regarding the countryside and natural and cultural heritage.

## Technical Questions

**Do you think these are the right principles for capital investment in the National Park and what key infrastructure projects should the National Park focus on over the next five years?**

**What are the key issues that you want the Regional Land Use Framework to focus on in the Cairngorms National Park?**

**What level of detail is needed for a Regional Land Use Framework to be of use to funders, communities and to land managers?**

**In the context of the National Park Partnership Plan and as the Regional Spatial Strategy, are there other strategic developments that you consider should be identified?**

### General points

The Highland Council welcomes the inclusion on the Indicative Regional Spatial Strategy diagram of the A9, Highland Main Line and Digital and also the approach to identifying areas for peatland priority, agricultural priority and woodland expansion. Likewise, the identification by CNPA of a hierarchy of settlements on the map should help focus thinking about the strength and resilience of community networks.

There would be benefit in having a clearer correlation between the regional spatial strategy diagram/legend and the relevant provisions set out elsewhere in the NPPP e.g. the A9 and Highland Main Line items on the diagram/legend should link across to Policy C1 point 3.

Some additional text may be required in order to draw the link between some features e.g. the legend refers to the Aviemore & Cairngorm Priority Area, but that term does not appear to be used elsewhere within the NPPP.

There may also be benefit to acknowledge the major rivers - the lochs are shown on the diagram but the rivers are also a key component of the blue infrastructure of the Park which it is suggested need to be pulled out as a priority in their own right.

The Highland Council's IRSS identified a number of 'Important Gateway' locations into Highland, including recognition that the National Park very much forms one of those gateways into Highland and this is a concept that CNPA may wish to consider reflecting.