

Cairngorms Nature Action Plan 2018-2023
Consultation Wednesday 20 June – Friday 14 September 2018
SURVEY

Your Details

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**Please
tick**

Is your work connected to the nature sector?

Yes

☒

No

☐

Do you work for a:

Private business

☐

NGO

☒

Local Authority

☐

Public organisation

☐

Other (please specify)

☐

Fair Collection Statement

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Data Protection

Your details will only be used for purposes associated with the Cairngorms Nature Action Plan. You may request to see personal information held by the CNPA at any time.



Please tick if you are happy to receive correspondence by email



Please tick to confirm you are happy for us to hold and use your personal data according to fair collection purposes



Please note we will not store personal data for anyone aged 16 or under – **please tick if you are aged 16 or under**

The Scottish Wildlife Trust welcomes this opportunity to respond to the Cairngorms Nature Action Plan (CNAP) consultation. Following brief responses to the survey, we structure our response according to the broad 'Agendas for Action', building on our experience in contributing to the responsible management and enhancement of Scotland's natural capital and supporting biodiversity.

Key Points

- The Trust welcomes and supports the ambitions of the CNAP, noting the appropriate balance between maintenance, enhancement and restoration of ecosystems, whilst acknowledging the importance of access to nature for health, wellbeing, education, and culture.
- The 2063 visions provide a helpful reminder of what can be achieved by acting now. Given the timescale and the increasing attention paid to biodiversity, we believe there's room to be even more ambitious, however.
- We recommend making the links between Cairngorms Nature and a broader range of strategies/policies to demonstrate the wider public benefits, for example *Tourism 2020*, *Good Food Nation* (2014) and *Scotland's outdoors: Our Natural Health Service*.
- Acknowledgement of the developing Environment Strategy is also important as it will guide the priorities in a range of the other land-based strategies that have been listed by Cairngorms Nature, and the forthcoming Forestry Strategy for Scotland.
- On peatlands restoration and carbon sequestration, we recommend noting and working to overcome the present knowledge gaps in greenhouse gas (GHG) emissions flux, such as accounting for methane, to build a clearer picture of how peatland restoration contributes.
- We encourage a more comprehensive assessment, including knowledge gaps, of threats and challenges to ecosystems, especially, but not limited to, climate change impacts.

Overview

| 1. Do you think the aims and priorities capture the main conservation issues we should be focusing on in the Cairngorms National Park for the next five years? | | Please tick |
|--|-----|-------------|
| Yes, but with caveats | Yes | ✓ |
| | No | |
| <p>If not, please let us know what you think we should be focusing on and why.</p> <p>The Scottish Wildlife Trust believes the Action Plan should lay out a much more comprehensive assessment of the challenges over the next 5 years and beyond. For example, the Plan makes no mention of climate change (other than the afforestation pledges in the Climate Change Bill) as an existential challenge for conservation and the resilience of our ecosystems in Scotland. We therefore encourage a more comprehensive assessment, including knowledge gaps, of threats and challenges to ecosystems, especially, but not limited to, climate change impacts.</p> | | |

| 2. Do you think the targets capture the progress the Action Plan is looking to make, and do they have the right level of ambition? | | Please tick |
|---|-----|-------------|
| | Yes | ✓ |
| | No | |
| <p>If not, please let us know how you think they could be improved.</p> <p>We believe that the Targets for engaging with people and developing volunteer networks could be more ambitious.</p> | | |

Aims, Priorities and Action

| 3. Do you agree with the objectives for ecosystem restoration? | | Please tick |
|--|-----|-------------|
| | Yes | ✓ |
| | No | |
| <p>If not, please let us know how you think they could be improved.</p> <p>The Trust welcomes and supports the ambitions of the CNAP, noting the appropriate balance between maintenance, enhancement and restoration of ecosystems, whilst acknowledging the importance of access to nature for health, wellbeing, education, and culture.</p> | | |

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| 4. Do you agree with the objectives for sustainable land management? | | Please tick |
|--|-----|-------------|
| | Yes | |
| We believe some changes are needed | No | ✓ |
| <p>If not, please let us know how you think they could be improved.</p> <p>We would emphasise the need to explicitly reference the need for restoration of moorland (grouse and deer moors) as part of the landscape scale conservation efforts.</p> <p>Whilst the plan acknowledges changes required in management approaches it could be stronger on emphasising the need for adherence to codes of practice including Muirburn Code, Code of Practice on Deer Management and the Principles of Moorland Management: mountain hare management code.</p> | | |

| 5. Do you agree with the objectives for involving people? | | Please tick |
|---|-----|-------------|
| Yes, but with caveats | Yes | ✓ |
| | No | |
| <p>If not, please let us know how you think they could be improved.</p> <p>We agree with the principle of involving people, but the Trust would welcome greater detail in how sustainable tourism is to be achieved. Particularly, how is the balance reached between protecting the right to access nature and the need to avoid its overconsumption?</p> | | |

Species

| 6. Does the Action Plan focus effort on the right species? | | Please tick |
|--|-----|-------------|
| | Yes | |
| | No | ✓ |
| <p>If not, without adding to the number of species overall, what changes would you suggest?</p> <p>There are educational and riparian management actions that could be taken to prepare the way for a further beaver release site in the Cairngorms and/or their arrival through natural re-colonisation. The Trust of course has considerable experience in beaver management issues through the Scottish Beaver Trial and inputs to the development of the national approach to managing wild beavers and would be pleased to assist the CNPA in this area. The plan should also recognise species such as salmon from a nature, economic and cultural perspective. We would also suggest adding red deer to the species priorities given the objective in this section “to get species back on a sustainable footing ...”.</p> | | |

Overview

Do you think the Aims and Priorities capture the main conservation issues we should be focussing on in the Cairngorms for the next five years?

The aims and priorities are generally fine although we would recommend that upland or moorland restoration is explicitly added to the priorities under the Landscape Scale Conservation aim. Tackling invasive non-native species (INNS) should also be added under Landscape Scale Conservation. The CNPA is in a unique position to facilitate landscape scale approaches to tackling INNS.

Do you agree with the following objectives for ecosystem restoration, sustainable land management and involving people? If not, how do you think they could be improved – please clearly note which objective your comment relates to.

Whilst the objectives are clear they lack integration. We would suggest that these are framed more around the concept of ecological networks and are seen as the CNPA's contribution to delivering the Scottish Government's commitments towards a National Ecological Network (NEN).

We would also suggest that explicit reference is made to the value of and valuing the natural capital in the Cairngorms. This could be incorporated into the objectives around the benefits that conservation brings or more engagement with nature.

It would be worth considering whether there should be a healthy soils objective within the Plan, both in relation to protecting and conserving soil biodiversity and the wider public benefits that healthy soils provide; especially in terms of water quality and soil fertility.

There is a lack of an explicit objective to urban environments within the Plan. We would recommend that one is added to emphasise the importance of urban place-making and strengthening the connections between urban and the surrounding rural ways of life. This would also help address the increasing threat of the disconnect between people and nature and help increase the opportunity for engagement through initiatives such as citizen science.

Aim 1: Landscape Scale Conservation

We would emphasise the need to explicitly reference the need for restoration of moorland (grouse and deer moors) as part of the landscape scale conservation efforts. This will have significant benefits to the diversity of the nature of these areas as well as a range of downstream benefits; especially natural flood alleviation, reduced erosion and sediment and pollution control.

Whilst the plan acknowledges changes required in management approaches it could be stronger on emphasising the need for adherence to codes of practice including *Muirburn Code*, *Code of Practice on Deer Management* and *the Principles of Moorland Management: mountain hare management code*. It is clear (from visual observations) that even the minimum requirements of these Codes are not being met in some areas in the CNP. There is a stronger leadership, educational and communications role that could be taken through this action plan.

Aim 2: Focussed Action for Priority Species

Does the Action Plan focus effort on the right species? If not, without adding to the number of species overall, what changes would you suggest?

We welcome the inclusion of beavers within the species priority table. There are educational and riparian management actions that could be taken to prepare the way for a further beaver release site in the Cairngorms and/or their arrival through natural re-colonisation. The Trust of course has considerable experience in beaver management issues through the Scottish Beaver Trial and inputs to the development of the national approach to managing wild beavers and would be pleased to assist the CNPA in this area.

It would seem appropriate to recognise the priority of species such as salmon from a nature, economic and cultural perspective within the plan. By incorporating these species more can be done to engage with the land (forestry and moorland) and fisheries sectors.

We would also suggest adding red deer to the species priorities given the objective in this section “to get species back on a sustainable footing ...”. Red deer are a keystone species of forests and woodlands and their population levels must be one of the most significant challenges in terms of the CNPA’s ability to deliver landscape scale habitat objectives within the plan.

To make space for these changes to the species listed we would suggest that either the invertebrates or plant species lists are reduced or simply acknowledge that support for initiatives such as the Cairngorms Rare Plant project will incorporate actions for a number of species.

We also welcome the continuing focus in the Plan to better understand and manage in a sustainable way mountain hares and to tackle issues of wildlife crime; especially for raptors and freshwater pearl mussels. We hope that the Scottish Government’s Grouse Moorland Group’s report will signal the actions required to a more sustainable, better regulated and more transparent system for moorland management in Scotland. The CNPA should lead by example here.

Aim 3: Involving People

The Trust notes the ‘Tread Lightly’ campaign in the Park but would welcome greater detail in how sustainable tourism is to be achieved. Particularly, how infrastructure developments will support tourism and how pressures on sensitive habitats and species will be managed and minimised.

We are supportive of the efforts being made to engage communities in land-use choices and management. We note that case studies exploring the techniques used and the lessons learnt will have wider applicability, especially for other landscape scale partnerships and, if these are resurrected, the Regional Land Use Projects under the Land Use Strategy for Scotland.

We believe that the Targets for engaging with people and developing volunteer networks could be more ambitious.

Delivery and monitoring

We strongly support the priority to ‘investigate and trial Natural Capital Accounting’ (page 34).

The monitoring and evaluation aspects of the Plan are not detailed. We believe there is an opportunity to develop a clearer suite of ecosystem health (condition) indicators (EHI) and impact indicators to underpin the assessment of progress against both the aims and the specific actions identified in the plan respectively. The approach taken to developing these would help consolidate and inform a more integrated approach to land management. The CNPA is in a unique position to facilitate the right partnerships with Scotland’s main research providers and academic institutes to lead by example on the development of EHIs and impact indicators - including social indicators.

Conclusion

Overall, we welcome the clarity and focus of the Plan but have suggested some areas where the ambition, leadership, and demonstrative role of the Park, working with key stakeholders, could be strengthened.