

7th March 2016

Cairngorms National Park Authority
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Dear Sir or Madam

Cairngorm Glenmore Strategy

Ramblers Scotland welcomes the opportunity to respond to the consultation for the Cairngorm Glenmore Strategy. Ramblers Scotland is a membership organization, and recognised by **sportscotland** as a governing body of sport. We have 6,500 members and 56 walking groups across Scotland all run by volunteers. A number of our groups are based within and around the national park, in Badenoch & Strathspey, Inverness, Strathgairn, Perth, Blairgowrie and Moray, while many others visit and walk in the national park.

Below we answer the specific questions from the consultation document. However, as introductory comments we would like to set out that we are supportive of the general direction of the strategy. There has long been a need to improve the visitor management and visitor experience in this area while at the same time respecting the high value of the landscape, wildlife and habitats there, and the proposals set out a sensible approach to start this process. Our comments below, therefore, are mostly restricted to areas where we feel we can make additional suggestions or they focus on areas which we believe need more detail than is set out in the document.

Question1: Set in the wider context, what in your view is the distinctive character and role of Cairngorm and Glenmore? How can it best contribute to the wider area?

We agree with the strategy document that this is an important and iconic destination within the Cairngorms National Park, and that the lack of an overall strategy for visitor management has led to many of the issues identified in the document. Therefore we would like to see more consideration given to the current and also future land use within the context of the high conservation and landscape value of the area, especially given the resulting restrictions on visitor capacity this brings. As one example, the SWOT analysis in Table 2 mentions 'being part of a bigger landscape scale vision for woodland and habitat restoration' and the goal in the table below para 7.6 talks about expanding woodland, but there is then no follow through elsewhere in the document or its annexes as to what this actually means in practice and how this could potentially impact on access or on the creation of new paths. We are aware that development of the Old Logging Way was difficult given that it passed through sensitive woodland habitat and so it is likely that there will be issues in further extending the path network in this area. Yet there is an expectation in the strategy that more visitors will be attracted to the area and therefore it is likely there may be a demand for more infrastructure to accommodate them.

We support efforts to improve the visitor experience, but also would like to suggest that there does seem to be a missed opportunity at this stage not to consider this area in a much wider strategic context of the national park as a whole and what it offers visitors. For example, the Glenmore Cairngorm area has historically received a large amount of public investment through the funicular development, and therefore it would be useful to consider the opportunity cost of further investment in this area as opposed to spreading that investment around other settlements in the national park, for example within Aberdeenshire or other parts of Badenoch & Strathspey, so that other visitor facilities receive a measure support rather than only concentrating on the Glenmore area. Given that there are restrictions on the capacity of the area, alluded to earlier, surely it would make sense to look at how to encourage a shift of a proportion of visitors elsewhere within the park?

In addition, the vast majority of visitors are day-visitors who arrive in Glenmore have driven from Aviemore, so it would be sensible to frame this strategy in terms of the whole corridor between Aviemore and Cairngorm, including Rothiemurchus estate, and we wonder why this area was excluded from the SEA in the first place. We support the intention within the strategy to discourage people from driving to Glenmore, but in that case there is a need for much clearer promotion of walking and cycling routes from Aviemore, whether along the Old Logging Way or on less direct paths through Rothiemurchus. Many routes within the wider path network, including core paths, are not shown on the accompanying maps and yet there must be a huge potential to use these existing routes to encourage circular trips by bus/walking or as cycle trips to Glenmore which then return by a different route to explore the forests more widely. For visitors, the ownership of the land is not important, and the boundary between Glenmore and Rothiemurchus is not noticed.

Including this wider corridor within the strategy would also take into account the landscape considerations of maintaining a sense of entering a wilder environment after leaving Aviemore, and help to ensure that, notwithstanding the proposed development at An Camas Mor, there is no potential for new ribbon development to take place along this road to the detriment of this wilder character. The incursion of this heavily visited area leading into the heart of the Cairngorms plateau has a direct impact on the central massif, whereas, in contrast, to the eastern side of the park where there is a wide buffer zone between settlements and the plateau. Therefore, the Glenmore area is particularly important in terms of protecting this side of the park from potentially damaging development in landscape or ecological terms.

Finally, the history of development in this part of the Cairngorms has often been controversial and has involved many conservation and recreation bodies representing the public interest in developments relating to downhill skiing or the funicular railway. Therefore it is disappointing that in the 'working in partnership' section, such bodies are relegated to third place after public bodies and local businesses, and only included as stakeholders who are part of "the wider community of people who feel a close connection to Cairngorm and Glenmore." Ideally such organisations, especially those like ourselves which represent the interests of walkers and hillwalkers who make up such a large proportion of visitors to the area, should have been included at the outset as major stakeholders when this strategy was being developed, rather than at this later stage. Nevertheless, we would like to confirm our willingness to engage in the development of this strategy in the future, and suggest that one route for regular discussions with governing bodies of sport and recreation could be through the Scottish Sports Association's Outdoor Pursuits Group.

Question 2: What do you currently like about Cairngorm and Glenmore that you want to see retained? What would you like to change or improve?

The statistics on visitor activities in Table 1 are very interesting and support an approach which boosts low level walking and cycling around existing woodland tracks, with some small improvements to the network as noted in the visitor improvement plan. Notwithstanding our earlier comments about encouraging visitors to explore other areas of the national park, this approach would help the area cope with an increasing number of visitors, reduce incidences of conflict amongst different users and spread people more widely around the path network, thus reducing pressure on some routes. This lower level activity is also much more likely to be available year-round when many people are less inclined to go higher into the mountains, and would help support businesses

throughout the year. As noted above, we would suggest looking at the entire visitor experience from Aviemore to Glenmore in planning how to increase and support non-motorised visitors in this area.

With regard to the SWOT analysis, it is a shame to see that there is a growth in irresponsible visitor behaviour. However, it should be remembered that even in more remote areas, such as Corrour bothy, litter is an issue, as well as along roadsides within the park so this behaviour is not confined to visitors to Loch Morlich beach. Therefore it would be good to see the national park engaged in Scotland-wide anti-litter initiatives to tackle this issue nationally as well as local initiatives through ranger services.

Question 3: Do you agree with the proposed vision, aim and objectives? If not, what would you change?

We broadly agree with the vision, aims and objectives as set out in this section, although we suggest including an additional goal to reduce the proportion of visitors arriving by car and increase the proportion of those using buses or bicycles/on foot. However, we are surprised not to see more reference to the 'Active Cairngorms' initiative beyond a brief mention with regard to the Highland Community Planning Partnership at the end of the document. This initiative states in its introduction that 'Active Cairngorms will help our visitors access the beauty of the Park in an active way.' (para 1.7) which appears to us to be highly relevant to this plan for Glenmore.

With regard to paras 7.4 and 7.5, our comments in Question 1 relate, in terms of looking at the Cairngorms NP more strategically to support a wider spread of visitors elsewhere in the park, as well as in managing increased visitor numbers to Glenmore who approach from Aviemore by car. Firstly, the strategy needs to consider the extent to which visitors can be encouraged to visit other parts of the park beyond Glenmore. These other settlements may then benefit from visitor expenditure which is spread more widely and where path networks and other facilities already exist to offer alternative experiences, although some financial support is likely to be required. This would relate to the objective to 'Support and enhance the regional economy'.

Secondly, we fully support the intention to look at other ways of travelling to Glenmore and, in time, establish a park and ride in Aviemore. However, people will not leave their cars behind unless the alternative is easier and more enjoyable. For many visitors there is the potential for the journey to become their day's activity as they explore the woodland on tracks between Aviemore and Glenmore. There needs to be a regular shuttle bus service into Glenmore and up to Cairngorm which is clearly marketed in Aviemore with obvious bus stops and up-to-date timetables. For example, at busy times there could be electronic signage on the road leaving Aviemore showing the number of car parking spaces available at Glenmore and encouraging use of the bus instead. Similarly, there could be promotion of specific walking/cycling routes giving timings to reach Glenmore and the location of any facilities en route (picnic areas, viewpoints, shelters, cafes and shops) so that a day's activity could be promoted as a healthy day out. Visitors could cycle from Aviemore to Glenmore and return by a different route, or take the bus to Glenmore and walk back. The opportunity could also be taken along these routes to disseminate information on conservation and give messages to reinforce understanding of the importance of the habitat and species in this area and responsible behaviour. Likewise, if the businesses in the area are able to give support, there could be initiatives to include discounts or vouchers to use in shops and cafes if visitors arrive in Glenmore without a car.

Question 4: Do you agree with the proposed approach and suggested headline areas of work identified? If not, what would you add or change?

We are broadly supportive of this approach. It would be useful in para 8.1 to set out a position on deer management in this area, particularly in terms of the use of deer fencing or habitat and woodland restoration which all could potentially affect access. This relates to our introductory comments in Q1 regarding the lack of discussion on current and future land use and management. Given the importance of this area for nature conservation at an international as well as national level, there should be some exploration of how this may affect access rights, such as the need for greater management of visitors at certain times of the year if higher levels of visitors are being introduced into sensitive areas. Likewise, if more people are attracted to the higher level

montane areas, erosion could be a major issue which would need to be managed, for example by path construction. There is very little discussion overall of the management of visitors in the higher montane areas, or of how higher numbers may exacerbate erosion.

Question 5: Are there other specific issues relating to Glenmore that you think this plan should address?

To add to our comments in Q2 above relating to litter, we question the use of photos in this section of overflowing litter bins being labelled as ‘irresponsible behaviour’. We believe this actually shows that people have tried to do the right thing, but the local authority has not emptied the bins in time to avoid this accumulation. In this case, if particular locations suffer regularly from overflowing bins, then perhaps more receptacles should be provided or at the very least specific signage posted along the lines of: “if this bin is full, please take your litter home as otherwise litter can damage the environment and wildlife”.

We are pleased to see the consideration of improved ranger services in this area which we believe will help to reinforce messages around positive behaviour change.

Question 6: Do you support the proposals? If not, what other proposals would help deliver the enhancements sought?

We broadly support these proposals, although refer you to our comments above in relation to consideration of the entire visitor experience as approaching from Aviemore to Glenmore and Cairngorm.

Question 7: Any Additional Comments

As a final comment, we do have a number of concerns regarding the proposals by Natural Retreats to further develop Cairngorm Mountain. Historically our organisation opposed the plan to establish a high level visitor attraction linked to the funicular, proposing instead a gondola scheme starting in Glenmore with the focus of activities at this lower level. We are still of the view that this would have resolved many of the issues which Natural Retreats is now trying to resolve, in terms of creating an all-year-round visitor attraction in an inappropriate location for high numbers of visitors. We commented specifically to Natural Retreats last year on their outline proposals, stating that while we were not in principle opposed to their plans, there would be implications for both nature conservation and safety in attracting larger visitor numbers to the area. The growing discussion relating to calls to open up the closed system at the top station would also need a clear response; we believe it would be a serious breach of legal planning restrictions if this were to be opened up.

We trust these comments are helpful but would be very happy to discuss further at any time.

Yours sincerely

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Campaigns & Policy Manager