Sandra Middleton, Outdoor Access Officer, CNPA, 14 The Square, Granton-on-Spey

Dear Sandra Middleton,

2006-09-20

Response to Consultation on Outdoor Access Strategy

Thankyou for the opportunity to comment on the CNPA Access Strategy.

We find this a clearly written and well-structured document that, within its limits, is well conceived and proposes many actions the Campaign would support. It is particularly useful that the document refers not only to proposed actions but also to a process (eg in the form of UDAT's programme) whereby the strategy can be realised.

We do however have one major reservation about the wider situation within which the Strategy is set. In our view it leads to important difficulties in the development of an Access Strategy.

Lack of an Overarching Recreational Strategy

Para 1.5 states that

"1.5 It is important to note that this is not a general strategy for recreation. There are many forms of recreation that take place in the Park – almost too many to list. And new forms of recreation are being developed constantly, while the popularity of some of the various types of recreation changes over time. But most forms of informal recreation in the Park depend on the ability to take access to land and water, so this Strategy focuses on how that access can take place in an appropriate way."

An Access Strategy, as framed in this plan, is a subset of a Recreation Strategy, and cannot really be written without first framing such a Recreation Strategy. This is particularly relevant when one notes the statement:-

"2.10 This Strategy sits within the context of a number of other strategies, prepared for the National Park. The most significant of these and their relationships to the draft National Park Plan are outlined in Figure 2.1 on the following page."

The figure that follows shows that there is no intention to prepare a Recreation Plan as part of the Park Plan although issues like Deer Management are a separate part of it.

The Cairngorms:-

- a) are an area in which outdoor recreations are a key activity within the whole social and physical landscape, and the local economy
- b) have been declared a National Park partly because of the need to manage the conflicts between recreations,
- c) are being affected by major land reform legislation profoundly influencing outdoor recreation.

The document also says:-

"2.3 The implementation of this Strategy will have a key role to play in the collective achievement of the National Park aims."

We find it inconceivable that, in an area like the above, the CNPA proposes to produce an Access Strategy to which it attaches such importance, but no overarching Recreation Strategy within which to frame it! This has serious consequences for the quality of the Access Strategy.

Consequences of the Lack of a Recreational Strategy

1) There is a superficiality about the treatment of recreation and its management that leads to major problems. Para 3.4 begins to bring in issues that a Recreation Strategy would explore such as the "quality of experience" of recreationists, but does not explore the implications of this for an Access Strategy.

As a more obvious example, it leads fine statements of "guiding principles" and "strategic objectives" into collision. OAS policy states "there should be opportunities for people of all abilities to experience all of the principal habitat types and landscapes of the Park;" The Strategic Objective "f) states "Protect the more fragile areas of the park from pressures arising from outdoor access and recreation" (See 3.10). To anyone familiar with the Cairngorms, these statements clearly contradict oneanother.

2) A more subtle and profound effect is that the focus of Access is restricted and becomes mentally and physically canalised into a focus on paths and path networks. There is no doubt that footpaths can and do increase access in areas where, for example, arable land makes any access difficult, or around settlements where privacy of residents becomes a concern and there are good examples of this within the Cairngorms area.

However, somewhere it is lost that **access** in the land reform legislation was about **access to all land**, with certain limited restrictions; that simply wandering and adventure was an important part of access. The exclusive focus on paths, the proliferation of signs directing people here and there, the notices telling you that "visitors are welcome" (even to forests they own and paid for as taxpayers) subtly canalises the mental awareness of recreationalists in a way that actually restricts access. Indeed the constant relegation of the national community that uses the Park to the status of "visitor" is a problem that pervades CNPA documents and reveals the pattern of thinking within

CNPA, is almost colonial in its outlook when used in notices etc by private estates, and is increasingly offensive to many people.

- 3) We are concerned at the educational model that underlies the whole approach, focused on educating "visitors." Education, we accept, is an important part of a recreational strategy and the access strategy within it but the educational model is outdated and has long been abandoned in fields like agricultural extension and environmental management. It presumes a local "knowledgeable" population and an "ignorant" visiting population when the reverse is often the case with regard to ecologically or recreationally based issues in the Scottish Highlands. It is also based on a monologue style of education, pursued through interpretive centres etc, rather than dialogue. It assumes that visitors must learn about access and the park etc but makes no allowance for example, for the idea that park/rural residents need to learn about their "visitors" or from them.
- 4) Even at the more "on the ground" level, a recreational strategy would provide guidelines as to where and when paths were and were not appropriate. There are paths constructed or being constructed in places where their presence is almost certainly unhelpful. As examples, the path being constructed through the Chalamain Gap in the Northern Corries by the Forestry Commission is almost certainly a mistake. Ease of access by road and later path construction have made the Northern Corries accessible to many who would not otherwise have had access to a high mountain cirque of corries and this is, on balance, desirable. However the more difficult going created by the boulder field and other features within the Gap, have always acted as a filter to remove less able walkers, a constrained pressure on vulnerable and more remote areas. Removing such effective filters is a mistake. Another example of mistaken pathwork is the upgrading of the path via Glen Quoich to the saddle between Beinn Abhuird and Ben Avon. By following the route up via Gleann an-t-Sluggain and connecting to this path, mountain bykers are now riding from the carpark at Invercauld to this saddle, removing protection from one of the last areas of the High Cairngorms in which it was really effective.

Although these problems are inherent in this Access Strategy, they do not arise from the document itself, or even the immediate approach of the authors of the documents, which we repeat are clearly written and constructed with many good policies, aims etc that we support. They arise indirectly from the failure of CNPA at Board or Senior Management level to ensure that a proper, overarching Recreational Philosophy and Strategy was prepared as a foundation on which an Access Strategy could be built.

We would be happy to discuss any of these points further with you.

Yours sincerely,

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