



The Mountaineering Council of Scotland

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Dear Sir

Cairngorm and Glenmore Partnership: Consultative draft strategy for the long term management of Cairngorm & Glenmore

The Mountaineering Council of Scotland (MCoS) welcomes the opportunity to comment on the draft strategy for this important area. After a statement of who we are, we make some general comments on the draft strategy and then answer the questions set out in the consultation, making a number of observations in doing so.

The MCoS is an independent organisation with almost 13,000 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland. We also act on landscape matters in Scotland for the 75,000 members of the British Mountaineering Council which contributes direct financial support to our policy work.

The MCoS interest is in the hills and crags, with the lower ground important as an approach route and setting. Glenmore is valued as a place where one can walk from natural-seeming forest to the Arctic-Alpine summits. It is also valued as a point of easy access to a wild environment. The graphic on page 5 illustrates well why the area is so important to our members and to many, many others. Many of our members, of course, will have other interests in low-ground walking, water-sports, skiing, cycling, nature-watching, etc. but our comments here are from the perspective of mountaineering interests.

The starting point for the management of Glenmore and Cairngorm must be the natural environment, rightly described in the consultation document as “An exceptionally high quality natural environment”.

We agree with the draft strategy when it states that there is an obligation to not only conserve but to actively enhance the conservation value of Cairngorm and Glenmore. Economic value must be achieved by building on this base, not at its expense. This approach has not always been evident in past decisions made by individual members of the Cairngorm and Glenmore Partnership.

We hope that the statement of intent made by this draft strategy indicates a desire to do better in future. Much of the language in the draft strategy, however, is sufficiently vague as to largely allow business as usual to continue. We therefore reserve judgement to see what practical actions emerge and what impact they make.

The main focus of the consultation seems to be on the corridor from Coire Cas car park to Aviemore, and on Glenmore rather than Cairn Gorm, which certainly places the focus on the area experiencing greatest visitor numbers and pressures.

There is very little mention of the mountains or higher corries and no cross-linkage made with Natural Retreats' emerging plans for redevelopment of the ski centre.

Mention is made of working with on-site businesses and neighbouring landowners but it not clear how much they are signed up to the draft strategy. For some of them, there could be significant implications: for example, Glenmore Lodge and Rothiemurchus Estate.

Question 1:

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?

Glenmore is a great cul-de-sac, sitting between the Kincardine Hills to the north and the Northern Corries and Carn Elrig to the south, leading the eye over forest and loch to the rampart of the Cairngorm plateau. Such an extensive basin is almost unique among Scottish landscapes, and for much of it to have survived largely unspoilt is remarkable. It is the gateway to the mountains as well as a destination in its own right for non-mountain activities. It can best contribute to the wider area by maintaining and enhancing this distinctiveness; keeping accommodation and other built facilities limited, discreet and sympathetic to the environment, clustered at the northeast end of Loch Morlich but otherwise limited and dispersed, with the day lodge area at Coire Cas something of an exception.

On the latter, we consider that there exists substantial scope for the environment of the day lodge, car parking and ski area, and in turn the visitor experience, to be improved through the regular cleansing and removal of assorted debris resulting from ski operations.

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?

With the exception of the ill-judged promotion of the An Camas Mor development and continuing doubts about the ecological and financial sustainability of Cairngorm Mountain, it is our impression that the direction of travel in the area has broadly been about right.

However, we agree that the core Glenmore facilities appear dated and that the cumulative consequences of a succession of *ad hoc* decisions over the years have not been beneficial.

Referring to the SWOT analysis, we broadly agree with the strengths identified though we must note that those who have never accepted the necessity of the funicular visitor management system keep raising the idea of having restrictions removed, without regard to the pressure that would ensue on vulnerable habitats.

We agree with the threats identified.

We broadly agree with the weaknesses, though identifying stopping points for photographs seems remarkably trivial in a 'strategic' document. More significantly, it is difficult to see behind the bundle of weaknesses around co-ordination, consistency and cross-selling to identify what practical impact their reduction or elimination would have. If a consistent identity is sought, will that be in addition to or replace existing identities – to be concrete, will the signs be branded CNP or FCS or Cairngorm and Glenmore Partnership? And if not CNP then how will that help wider brand identity across Strathspey, still less across the Park as a whole?

We have a similar difficulty with the opportunities. What practical actions would 'improving the connectivity of the visitor experience' make? Would such actions adversely affect the landscape and ecology? Would they change visitor numbers or pressures? For the avoidance of doubt, the MCofS is not unsupportive of the opportunities identified, and particularly the first and last bullet-points which could provide an over-arching theme. It is simply that we find it difficult to assess how substantial the outcomes might be and how this might impact on our members' interests.

We would suggest that all 'change or improvement' should be able to pass the test of addressing the first and last 'opportunities' bullets:

- Being part of a bigger landscape scale vision for woodland expansion and habitat restoration
- An exemplar of integration between conservation and visitor experience

Any proposed development that is not at worst neutral in its impact towards the achievement of these goals should be ruled out.

Question 3:

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

The MCofS agrees with the general thrust as shown in the 'future direction' graphic on page 12. It is expressed in such broad terms that it would be difficult not to.

However, we must take issue with the concept of Glenmore and Cairngorm's northern slopes being "An accessible wildness at the heart of the Cairngorms National Park". From the perspective of hill-walkers, the 'heart' of the Cairngorms is not Glenmore and the northern slopes (harsh though they can be) but the genuinely wild interior.

For climbers, it is more dispersed but we might suggest the Shelter Stone Crag. This is not to suggest that the northern corries and adjoining plateau are not of very high importance both for recreation and conservation. Rather it is to point out the dangers of misrepresenting an accessible edge of wildness and unwittingly encouraging people to proceed beyond their level of competence. The accessibility of this 'edge' also highlights the challenge of absorbing, and indeed encouraging, increasing numbers of people in areas of vulnerable ecology and sensitive landscape.

While the MCofS would support improving public transport, paragraph 7.5 fails to understand that for those seeking to access the mountains via Glenmore, the journey is simply a means to an end, not part of a 'visitor experience'. Experience from National Parks in the USA suggests that public transport such as shuttle buses needs to be cheap, frequent and run very early and very late to provide a realistic alternative to personal transport for activities such as mountaineering and 'back-country' access.

The map on page 13 suggests that priority will be given to 'mountain recreation and education' in the ski area. We would like to see this qualified to ensure that it is achieved in ways consistent with the conservation of natural heritage.

Question 4:

Do you agree with the proposed approach and suggested headline areas of work identified?

If not, what would you add or change?

While some hyperbole is inevitable in documents of this type, such as referring to the area as being at the heart of the Cairngorms National Park, such geographical nonsense as "Cairngorm and Glenmore lie at the heart of the mountain plateau..." (para. 8.1) cannot be allowed to stand. The area covered by the draft strategy barely reaches one part of the edge of the extensive dissected plateau that constitutes the geographic heart of the Cairngorms. The people of Braemar may also have a different perspective.

We support the goals and activities to "Enhance habitats and species conservation on a landscape scale". We particularly welcome the commitment to "Continue to operate effective visitor management on Cairngorm Mountain".

We support the goals and activities to "Enhance the visitor experience to match the quality of environment". We would anticipate that further consultation will take place on the details of proposed actions such as rationalising and co-ordinating car parking provision.

We support the goals and activities to "Support and enhance the regional economy".

We support the goals and activities to "Create outdoor recreation and learning opportunities for all". We assume that this refers to learning of the kind already undertaken at Glenmore Lodge and not more generic outdoor 'classrooms' that can be located closer to settlements and do not need to be in a pressured zone in a National Park.

Our support for all the activities proposed is qualified by a need to see the detail of implementation before we could form a final view on whether they are consistent with our members' interests, and the interests of the wider Cairngorms user and resident population.

For example, while the intention to rationalise and co-ordinate car parking provision appears reasonable, we could not support it if it meant in practice there would be fewer places, in less convenient locations, with higher charges.

We hope you find these comments helpful.

Yours sincerely,

David Gibson
Chief Executive Officer