

The consultation on the Lomond and Trossachs National Park Partnership plan

Description

The [official consultation](#) on the draft Loch Lomond and Trossachs National Park Partnership Plan (NPPP) 2018-23 closes on Monday 3rd July. The NPPP is the key document governing what the LLTNPA is supposed to do over the next five years so its important people respond. In this post I will take an overview of the consultation documents and then, in three further posts, will consider the three themes in the consultation, Conservation and Land Management, Rural Development and Visitor Experience, which broadly mirror the National Park's statutory objectives. I hope people with an interest in our National Parks will respond to the consultation and that these posts may inform those responses. Its easy to be cynical about consultations, and I believe the LLTNPA consultation demonstrates just how hollowed out consultation processes have become, but public pressure does work. A good example is the pledge which was added to the Cairngorms National Park Partnership Plan to eliminate raptor persecution over the next five years. Pressure needs to be exerted on the LLTNPA to radically up its game.

Where is the review of the current NPPP?

A rational starting point for developing any new plan should be a review of existing plans, covering matters such as successes, failures and consideration as to what needs to change. The current NPPP, 2012-17, was initially reviewed on an annual basis, at a meeting chaired by the Environment Minister. The Reviews are available on the LLTNPA website [NPPPlan](#) but you will never come across these if you go straight to the consultation pages and there is no mention of them in the consultation documents nor is there any explanation of why the last one was in 2014. Had the reviews been undertaken as originally intended, the information from them could have been fed into the new planning process. Instead, publicly at least, there is a huge hole.

What the last review in 2014 does show is that the LLTNPA was facing certain serious issues and was lacking data on critical issues.

National Park Indicator	Baseline
% of designated site features in favourable condition	83%
Number of whole farm or estate plans	0
% of water bodies achieving high/good status	48%
% of land under woodland	27%
Number of hectares of peatland (soils and habitats) improved	35 hectares
Number of buildings on the buildings at risk register	16
% of visitors satisfied with cleanliness of countryside	86%
% of residents and visitors that feel safe	93%
Numbers of overnight stays	2,003,000
Hotel capacity	19,851

Extract from NPPP Review

Note how the LLTNPA classed a drop in percentage of designated conservation sites in favourable conditions with an “equals” symbol, meaning there was nothing to worry about. And, were the LLTNPA to have collected data on % of visitors satisfied with cleanliness of the countryside I suspect there would have been a massive drop from 86%. This raises the question about whether the LLTNPA is now simply operating in a post-truth environment, that its not collecting and reporting data because it would not support its marketing hype. Other measures from 2013-14 were even worse: a drop in the percentage of new affordable housing from a baseline of 75% to 43% and a drop in new business start ups.

Where is the consultation on the issues the LLTNPA is facing?

The consultation documents do not ask people to consider the issues the National Park faces, quite a contrast to the Cairngorms National Park Authority consultation which was based around “The Big 9” issues they had identified. The only place that there is any consideration of the issues is in the [Strategic Environment Assessment](#) which most people won’t read as nowhere in the consultation does it suggest this might be worth reading. I can see why, because the SEA explains how the consultation should have been undertaken:

“the dynamic assessment of environmental objectives / targets with trends data can help to identify emerging environmental issues that should ideally be addressed early on.”

It then goes on to highlight *“the most critical environmental issues (problems and opportunities) that should be considered in the development of the NPPP 2018-2023”*. Nowhere does the LLTNPA explain how these issues have informed the development of the NPPP, indeed its not clear they have been considered at all.

Its well worth looking at Appendix 3 to the SEA to see how the LLTNPA is actually doing. Here is an example:

Landscape and cultural heritage	
<ul style="list-style-type: none"> • Designated landscapes: the Park contains three National Scenic Areas (NSAs): Loch Lomond; the Trossachs; and the River Earn (Comrie to St Fillans stretch). There are also three designated Garden and Designed Landscape sites (see Figure 4.3). • Agriculture: registered agricultural land accounts for 55% of the Park’s land. • Wild land: the park is home to two designated wild land areas¹¹: Ben Lui¹²; and 	Landscape impacts: increased cumulative impacts on landscape from different forms of development (e.g. housing, minerals, energy) within and outwith the Park.
	Infrastructure pressures: growing demand for infrastructure upgrade due to increased tourism and visitor numbers.

And here’s another: *“The Park has 27 designated sites assessed as being in “unfavourable” condition due to grazing pressures.”*

So we have a draft NPPP which makes almost no mention of the serious issues the NPPP faces. This is a fundamental failing, nay a dereliction of duty – the plan has no foundations.

An outcomes based plan

Instead of considering the evidence and what issues it faces the draft NPPP starts and ends with a

consideration of outcomes. It appears that what is driving this is the Scottish Government's National Outcome framework.

NATIONAL PARKS DELIVERING FOR SCOTLAND

This Partnership Plan aims to address issues and opportunities within Loch Lomond & The Trossachs National Park, while ensuring delivery of national priorities and achieving benefits for Scotland beyond the Park boundaries.

By leading successful partnerships, our National Parks can contribute significantly to the Scottish Government's Programme for Scotland, which is aimed at achieving:

A resilient and growing economy, an education system that enables true equality of opportunity for all, public services that are efficient, fair, flexible and valued, and a vibrant, open and inclusive cultural life.

Source: A Plan for Scotland, The Government's Programme for Scotland 2016-17

Our National Parks can make a significant contribution to many of the Scottish Government's stated priorities including:

- Making our Education System World Class With Equal Opportunities for All
- Growing a Productive, Sustainable Economy with More Jobs and Fair Work
- Transforming Public Services – Nurturing the NHS, Working for a Healthier Scotland, and Making Scotland Safer
- Putting People in Charge and Creating Opportunities

National Parks bring clarity of focus in addressing a range of interrelated rural issues at a regional and local scale ensuring better co-ordinated delivery and best use of limited public resources. This also makes our Parks a perfect place to innovate and develop new solutions.

This Plan seeks to promote partnerships and activities that can:

- Manage and improve the condition of our natural assets on a **landscape scale**
- Promote, test and prototype innovative solutions to rural issues
- Widen the range of benefits that the National Park's outstanding environment can provide to Scotland's people and its visitors

If our National Parks really have a “significant contribution” to “making our Education system world class”, why then is there no commitment to re-open outdoor education centres throughout the National Park?

While our National Parks can contribute to some national outcomes, actually that's not their primary purpose, which is to meet their statutory objectives. The Plan though, instead of considering how it can meet those statutory objectives, is full of meaningless claims to be contributing to certain outcomes.



Near the top of each section in the plan there is this graphic – a graphic illustration of priorities. While the civil servants must be slaving all this does is make the LLTNPA look like a meaningless pawn controlled by central government.

The outcomes themselves, are very worthy – it would be hard to object to any of them – but so broad as to be meaningless.

WHAT OUTCOMES WILL WE FOCUS OUR EFFORTS ON TO ACHIEVE THIS VISION?

CONSERVATION OUTCOME	CONSERVATION OUTCOME	CONSERVATION OUTCOME	CONSERVATION OUTCOME
C1	C2	C3	C4
The Park's natural resources are enhanced for future generations: important habitats are restored and better connected on a landscape scale.	The Park's special landscape qualities and sense of place are conserved and enhanced with more opportunities to enjoy and experience them.	The natural environment of the Park is better managed to help mitigate and address the impacts of climate change.	New catchment-scale partnerships deliver better integrated management of the land and water environment providing multiple benefits for people and nature.

Conservation outcomes from the NPPP

If they were meaningful the LLTNPA should be able to explain the extent to which the outcomes are being met at present. They have made no attempt to do so. The problem is the first two consultation questions are devoted to asking people if they agree with these very broad statements:

CONSERVATION

- Do you agree with the overarching Conservation vision?
- Do you agree with the 4 Conservation outcomes?
- Do you agree with the 11 Conservation priorities?
- Do you have any specific comments on the priorities or outcomes?
- Are there areas that you think are important and that are not covered by the priorities?
- Is your organisation willing to sign up to the delivery of the priorities and, if so, what/how does your organisation intend to contribute?
- Are there other organisations that you think should be included as delivery partners?

Its unlikely any people will disagree. The Park has then identified a number of priorities for each outcome without any analysis of why that priority makes sense and again the priority is so broadly defined its rarely possible to tell what if anything the LLTNPA and its partners are planning to do:

OUR PRIORITIES FOR ACTION:

CONSERVATION PRIORITY 3

The Park Authority will work to conserve and enhance qualities of wildness, cultural heritage features, tranquillity and dark skies by positively managing developments and projects to protect these qualities and by supporting targeted projects which enhance them.

CONSERVATION PRIORITY 4

Supporting projects that enhance opportunities to enjoy landscapes particularly along major transport routes and around settlements and also that better meet the different travel mode needs of visitors, communities and businesses. Priorities include:

- Implementing a strategically planned and designed upgrade to the A82 between Tarbet and Inverarnan;
- Continuing to review landslip management measures on the A83 at The Rest and Be Thankful.

CONSERVATION PRIORITY 5

Landscape enhancements that also deliver improvements for nature such as woodland creation, wetland restoration or tackling invasive non-native species.

CONSERVATION PRIORITY 6

Safeguarding and restoring tranquil loch-shores through the Your Park and Respect Your Park Initiatives.

Extract from conservation priorities. In this slide only under priority 4 does the LLTNPA give an indication of what might be going to happen.

The danger is that anyone who agrees with the priorities as proposed will be treated by the LLTNPA as agreeing to whatever actions they have or have not planned to do. It is amazing that under the conservation of landscape priority the only two actions are actually about altering, one might say “destroying”, the natural landscape.

The secret and biased consultation process

The draft plan does not explain how its been developed or how priorities might have been selected. To know this you need to read the LLTNPA’s Annual Report approved by its Board this week:

“The close of the year saw the Board approve our new draft National Park Partnership Plan 2018-23 for consultation following a hugely positive workshop with a wide range of stakeholders to discuss important issues and potential priorities. This presented an opportunity to reflect on the achievements of the current plan.

To this end, a comprehensive discussion paper was developed and a day-long event was held for partners that have a role to play in the delivery of the new Plan”

So why is the comprehensive discussion paper not public and why has the LLTNPA not told the public what it believes these achievements were? (I have asked for these to be made public immediately).

What I do know is that the LLTNPA selected the invitees to the consultation meeting very carefully and the range of “stakeholders” was limited: recreational and other organisations were not invited to the

main workshop though there was a later briefing. No wonder the NPPP gives no consideration to issues like the destruction of landscape and failures in conservation in the National Park.

Nowhere in the NPPP are the organisations which represent people who visit the National Park treated as partners or even key stakeholders. A fundamental failing – although of course the glossy brochure is full of photos of the people such organisations represent.

How does the NPPP fit with other Strategies and Policies?

Unlike the Cairngorms NPPP, which attempted to describe how their NPPP fitted with out plans that had been agreed for the area, the LLTNPA makes almost no mention of other local plans or targets and how they might feed into the NPPP. There are references to national plans and strategies, but generally this is again at a very high level and so broad as to be meaningless.

Part of the issue is that the LLTNPA has far fewer plans and strategies than the CNPA and those that it does have tend to be focussed on developments (Callander and Balloch). It does though have a biodiversity plan, Wild Park 2012 ([see here](#)) with lots of detailed actions and targets. How this fits with the NPPP, how its informed priorities and whether the LLTNPA is committed to a new biodiversity action plan is unclear.

The draft NPPP would have us believe it is joined up to everything when the reality is it appears joined up to almost nothing and practically empty of real commitments from either the LLTNPA or the organisations it has identified as its partners.

Not all of this is the fault of the LLTNPA, much comes down to austerity – our public authorities are no longer being allowed to plan to do things which could improve everyone's lives. But in my view our National Park Authorities out loud about resources, not just for themselves but for other partners, if any of its statutory objectives are to be achieved.

What needs to happen

People and organisations need to put pressure on the LLTNPA and the Scottish Government. A good start would be to respond to the NPPP objecting to the failure by the LLTNPA to review progress under the existing NPPP, consider the multitude of information about what is actually going on in the Park

and the serious issues it faces. People should then use that reality to inform what issues they would like the LLTNPA to address in the new plan.

The LLTNPA needs to ensure that the new NPPP is based on a proper analysis of the evidence it holds and needs to take a critical look at how its being doing in relation to its statutory objectives.

I will cover the detail of this in posts over the next 10 days.

Category

1. Loch Lomond and Trossachs

Tags

1. LLTNPA
2. Minister Environment
3. planning
4. Scottish Government
5. vision for National Parks

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