

## The LLTNPA's approach to estate management plans

### Description

I start with a belief that how the land in our National Parks is managed is central to what they do.

Currently I have an appeal being investigated by the Scottish Information Commissioner about the Loch Lomond and Trossachs National Park's refusal to provide me or to make public any information from the land management plans it has agreed with landowners. The LLTNPA, which still appears wedded to an ethos of secrecy, is claiming the entire content of these plans is commercially sensitive whereas I am arguing that it is in the public interest to know what agreements our National Parks are making with landowners.

While drafting the appeal I found in the Review of the National Park Partnership Plan 2013-14 ([see here](#)) – the last such review before these were abandoned – this:

C7	Land management plans	By 2017 25% of all private land in the National Park has a long-term management plan.	Our pilot phase is complete and evaluated. Our revised model will have been made with National Farmers Union Scotland and Scottish scheme.
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I therefore, naively perhaps, made in October a further request for all information relating to how the pilot Land Management plans had been evaluated.

The initial response appeared to confirm there had been an evaluation:

*As outlined in the 2014 review of the National Park Partnership plan, the pilot phase of land management plans (previously known as Whole Farm and Whole Estate Plans) was completed and evaluated. Relevant searches have been carried out for information about this evaluation process. Information has been located in various updates to the Delivery Group, extracts of which are attached in Appendix A.*

However, none of the extracts referred to above and sent to me ([see here](#)) – and I appreciate the time that staff must have taken to track all down – contained anything which could remotely be described as an evaluation of the Plans. I therefore submitted a review request ([see here](#)) and received a response ([see here](#)) just before Xmas. This helpfully clarifies that there was NO evaluation report but also shows that NO other meaningful evaluation of the land management plans was ever conducted. The best that the LLTNPA could come up with in terms of evaluative information it holds on the pilot (and it dates from 2016 almost two years after the LLTNPA had claimed in the report to Ministers that the pilot had been evaluated!) is this:

**From:** Land Management Adviser  
**Sent:** 29 April 2016 16:28  
**To:** Harriet Smith  
**Cc:** Alan Bell  
**Subject:** Reviews of XXXXXXXX

Hi Harriet

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As discussed, I think the time is not right to similarly re  
please let me know if you/Simon do need something r  
Thanks.

XXXXXX

XXXXXX

Land Management Adviser

## What constitutes an evaluation of a pilot?

While the word “evaluation” can be used in informal circumstances – “I evaluated what to do next” – when it comes to public authorities it has, I believe, a very specific meaning which is well reflected in the Merriam Webster online dictionary definition:

*“to determine the significance, worth, or condition of usually by careful appraisal and study”*

The information responses show that there is no evidence that the LLTNPA has conducted any such appraisal of its land management plans. Yet its Review Report to Ministers and updates to Board Members suggests otherwise. Its not clear whether this happened because the then Land Management Adviser claimed to evaluated the plans but this was never checked by senior managers (which I suspect is unlikely) or because some senior manager wanted the box ticked even if no evaluation had take place. Whatever the case its an approach to evaluation which reflects Donald Trump’s America rather than what we should expect in Scotland.

I also find this interesting because it shows the LLTNPA senior management’s cavalier approach to evidence and disregard for the truth started well before they manipulated the Your Park consultation on the camping byelaws.

## Why openness about land management plans is needed

The lack of any proper evaluation still matters because Conservation Priority 5 in the new LLTNPA National Park Partnership Plan is on Integrated Land Management and contains this commitment:

*Support land managers to plan and deliver multiple environmental and social benefits, alongside economic return, through the creation and delivery of Integrated Land Management Plans for land management businesses.*

So the LLTNPA is pressing ahead with something without knowing whether the plans which have so far been put in place work. That the LLTNPA is now trying to keep the plans it has agreed secret suggests there is something else to hide.

An indication of what this might be is given in the LLTNPA’s response which does at least reveal four of the estates/farms which have been involved so far:

- Benmore Farm
- Protnellan (sic)
- Inverlochlarig
- Loch Dochart

All are clustered around Glen Dochart/Balquhidder and two at least have developed hydro schemes (the Park planning portal is down so unable to check whether Loch Dochart scheme is on Loch Dochart farm). This raises questions about the extent to which the LLTNPA has been taking account of landscape considerations in the agreement it has reached with landowners and before the impacts

are considered by the LLTNPA as planning authority.

## What needs to happen

The failure to evaluate properly the land management plans agreed between the LLTNPA and Landowners is, to my mind, a serious failure in governance and reflects the LLTNPA's failure to take an evidence informed approach to what it does. I would like to see the LLTNPA Board do two things:

- First, to affirm that it is committed to a change in direction which involves developing an evidence based approach and, as part of that, to make the evidence on which it bases its decision public. Anything else and we are in the world of Donald Trump and his post-truth approach to government.
- Second, to commit to remedying past deficiencies in how it has used evidence. As part of this it could instruct its Audit Committee to start to focus on the things that matter, including standards for evaluation and what information the LLTNPA holds which could be made public

## Category

1. Loch Lomond and Trossachs

## Tags

1. Governance
2. landed estates
3. LLTNPA
4. secrecy

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