

A National Park is not a big National Nature Reserve

Description

The Draft Partnership Plan from the Loch Lomond and Trossachs National Park Authority (LLTNPA) has now been published ([see here](#)) and I have become convinced it should not be accepted without very significant changes. As it stands it fails completely to lay out how the Park should proceed in order to achieve its third objective: *to promote understanding and enjoyment of the special qualities of the area by the public*. In simple terms the Plan, as set out, appears to be for a National Nature Reserve not for a National Park.

When National Parks were established, most of us thought we understood what they were about. Firstly, the two areas chosen (Loch Lomond and Cairngorms) were spectacularly beautiful and needed to be protected from mining, quarrying, power lines, wind farms, overgrazing etc. to conserve the landscape. Secondly the random, disorganised facilities that visitors use to enjoy the landscape: the car parks, beaches, footpaths, cycle paths, forest trails, bus links, cafes, camp sites, boat trips, visitor centres etc. etc. would, we hoped, be improved and co-ordinated. Quieter parts of the Park would be promoted, Honey-Pot areas controlled. Rubbish and litter would be removed.

Various tasks within the Park, such as Public Transport, water sports, litter collection, nature conservation, hotel services and path maintenance were already being undertaken and we understood the National Park Authority was charged with co-ordinating these with an overarching Partnership Plan. *“These plans set out how all those with a responsibility in each park, across public, private and voluntary organisations, will co-ordinate their work to address the most important issues in relation to conservation, visitor experience and rural development”*. (<https://www.gov.scot/policies/landscape-and-outdoor-access/national-parks/#>)

The first National Park Partnership Plan identified what they hoped the Visitor Experience would be like:

“Our vision: We want the National Park to be an internationally-renowned landscape where... there is a high quality, authentic experience for people from all backgrounds. There are many opportunities to enjoy recreation activities and appreciate the area’s outstanding natural and cultural heritage within an internationally-renowned landscape.

What we want to achieve:

Outcome 5: Recreation opportunities

The National Park has a wide variety of well promoted and managed outdoor recreation opportunities providing for a range of abilities and interests.

Outcome 6: Water Recreation

There are more opportunities to enjoy water-based recreation and sporting activities across the Park’s lochs, rivers and coasts while maximising safety for all users and protecting the quality of water

environments.

[Outcome 7: Visitor economy](#)

The Park's visitor economy is thriving with more businesses and organisations working together to create a world-class destination.

[Outcome 8: Visitor management](#)

The most popular parts of the National Park which experience pressures are managed to ensure that the quality of environment, visitor experience and community life are protected and enhanced.

[Outcome 9: Health and learning](#)

People from a wider range of backgrounds are enjoying, valuing and helping manage the National Park. It is used more as a place for people to realise the personal health and wellbeing benefits of connecting with nature and being active in the outdoors."

Actions to meet these objectives were then detailed in an [Outdoor Recreation Plan](#).

The new Draft National Park Partnership Plan takes a totally different approach to the previous plan. Apparently, this is *"because during the period of the previous Partnership Plan, 2018-23, the context within which the National Park Authority and our delivery partners work has completely changed – we are recovering from the impacts of a global pandemic, adjusting to the UK leaving the EU, and the need to respond with greater urgency to the twin climate and nature crises has escalated significantly"*. Outdoor Recreation, far from being the *raison d'être* of the National Park, has become a threat. Climate Change and Nature Conservation are now paramount. Where restricting wild camping has offered a model, restricting access to sites of importance to nature conservation will follow.

It became clear at the explanatory Webinar on the new plan conducted by the Authority that the speaker believed that there exists some "ideal" position where there is no change in climate and no associated changes in flora and fauna. This defines what some believe to be the sustainable position. In practice there are bound to be changes, many brought about by human activity. Sometimes the change will be too fast with unpredictable and dangerous ramifications. The job of governments and their agencies is to ensure that the change is compatible with the overall welfare of the community.

There are many elements that make up welfare. The mental and physical health of the population of the West of Scotland is as much an issue to be considered as the health of the wildlife (and there actually is an immediate crisis of Obesity leading to early death). There is no doubt that where transport in the Park is concerned, the use of subsidy (which is far from sustainable in the very limited sense of users covering costs) is perfectly acceptable. The Plan needs to consider these issues. However with Climate Change and Nature Conservation (Sustainability) dictating the agenda, the management of visitors rather than the promotion of recreational opportunities becomes the Plan. The result is the overall objective is identified as "Creating A Sustainable, Low-Carbon Destination".

I do not accept the fundamental argument italicised above. Far from the pandemic and Brexit reducing the importance of Outdoor Recreation in the Park it has, in fact increased it. The pandemic itself encouraged people outdoors and significantly increased long term participation in more active

pastimes such as kayaking and hill-walking. It also encouraged “staycations”. Similarly, the main feature of Brexit has been the collapse in the value of the pound against the Dollar and the Euro, making vacations in Scotland more attractive to both. There are, as a result, huge problems of too many people at the “Honey-Pot” sites such as Luss and Balmaha and grossly congested roads in the Park, like the A82 at Stonemollan. The associated problems are parking, including facilities for overnight stays, litter and human waste. Given the situation at Balloch, development of “self-catering” villages is, surprisingly, not even mentioned. Sustainable?

The impact the proposed National Park Plan on Climate Change will be close to zero. The proposed Master Plan at Tarbet consists of an expansion of vehicle parking; much needed but hardly a step towards Zero Carbon. With the expansion of vehicle numbers and increased access to motor vehicles, any move to net zero will be the result of the move away from diesel and carbon vehicles to electric and the gradual disappearance of gas guzzlers. The speed of the transition will largely be determined by the price and the availability of charging points. Which “partner” will take responsibility for installing charging points in Car Parks in the Park? Will it be the LLTNPA?

One other factor that determines the rate of progress towards net zero in the Park, is congestion. Traffic jams have an extremely detrimental impact on fuel consumption and pollution. There will be 5 years of disruption, congestion and single lane working on the A82 if the proposed shore-side route is followed and undoubtedly similar with current proposals for the A83 Rest and be Thankful. Yet neither of these huge infrastructure projects have been mentioned by the LLTNPA in this planning document. It is difficult to believe that slowing climate change is more than a slogan to avoid identifying how the Park proposes to deal with the real problems.

I was surprised at the suggestion that there is a “Nature Crisis” in the National Park, because there does not appear to be: *“Our ecosystems are in good health and helping us to adapt to and mitigate against the climate crisis, supporting the National Park to be an overall net carbon sink for Scotland”*. Like Climate Change the adoption of this slogan will have minimal impact on global nature problems such as the destruction of the Amazonian rain forest and the rapidly declining diversity of both fauna and flora.

In 2011 the LLTNPA published a study which looked at the “Value” of the National Park. For activities where there are no charges, such as hillwalking, looking at the landscape or extracting drinking water, various techniques from environmental economics were utilised to give them values. What was unexpected was the huge annual contribution of the Park to Public Health (£95.4m). Feeling good appears to be very, very valuable to us!

Unlike Climate and Nature there is a Crisis which the LLTNPA can actually mitigate; that of Obesity. In my view Active Travel and Outdoor Recreation, backed up by cheap effective public transport, in a conserved landscape, should be the focus of the National Park and its Partners for the foreseeable future. It should be recognised that public transport could easily be marketed in relation to one-way trips such as Arrochar to Balloch. Abandoning the Outdoor Recreation Plan is exactly and completely in the wrong direction. Making no attempt to improve opportunities for Outdoor Activity in the Tarbet Master Plan is a similar missed opportunity. Not taking responsibility for the West Loch Lomond cycle path is sadly typical. The tacit opposition to opening the North-West of the Loch by rerouting the A82 higher up the hill is, in my view, a betrayal of the objectives of the Park.

Within the Draft there are proposals but they seem partial. Few of us could object to the plan for

Transport:

- *Develop a governance model in collaboration with responsible transport authorities and agencies which enables a National Park wide approach to rural transport planning.*
- *Develop new targeted seasonal transport services that provide a viable and attractive alternative to the private car to access popular National Park destinations.*
- *Gather data which demonstrates the latent demand for rural travel to inform service planning.*
- *Develop and deliver an active travel strategy that links up services and infrastructure as key parts of an integrated, connected multi-modal transport experience of the National Park.*

However does anybody seriously believe that most people will be using public transport in the park in 2030 without some very serious changes such as no cars on east Loch Lomond on summer weekends or free transport to and up the Loch for families. Will anyone use the waterbus as a “bus” if it costs £46 for a family of 4 to cross one-way to Inversnaid?

Finally, I should add a worry that the de-carbonisation plan involving peat restoration and woodland planting, which appears to be central to the proposed strategy, is based on an estimate of tourism activity from the STEAM model. STEAM estimates are based largely on tourist expenditure ratios and in the past did not appear to match physical counts or be safe. In the case of the LLTNP, which has a very large day trip market, the estimates are substantially below those estimated from traffic entry and exit statistics. In our 2011 study we were surprised indeed shocked that no-one in the Park could provide any agreed number of visitors. Given Loch Lomond Shores alone claimed 1.3m visitors in 2016, the notion that there were only 2.3m visits to the Park in total is impossible to believe. A further check is the STEAM estimate of the transport to get to the Park. Their estimate is that 15% (1 in 6) came by plane; a figure that is clearly too high and is the result of the denominator (total numbers) being far too low.

One conclusion of the 2011 study was that the LLTNPA should establish an annual analysis of traffic flows to better estimate what should be the most important measure of how it is performing; visitor numbers. It was not undertaken and, as ever, it probably has a better estimate of the number of water voles than the number of people.

Category

1. Loch Lomond and Trossachs

Tags

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