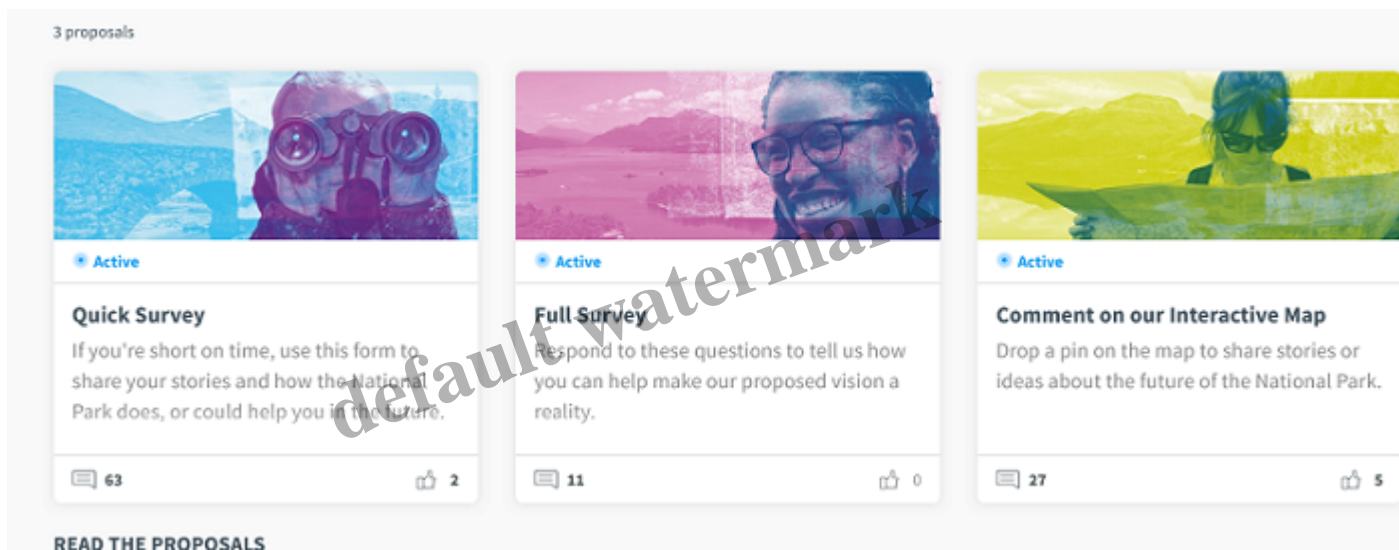


The main flaws in the draft Loch Lomond and Trossachs National Park Partnership Plan and why it should be scrapped

Description

The consultation on the Loch Lomond and Trossachs National Park Authority (LLTNPA)'s National Park Partnership Plan (NPPP) 2024-29 has been live since 26th April and closes on Wednesday. There have been few responses so far through the online platform "commonplace" ([see here](#)) despite the LLTNPA's attempts to frame the new plan as having a pivotal role in addressing the climate and nature emergencies:



Very few of the comments to date are positive about the plan and those on the interactive map, for example, draw attention to issues that have been around for a long time: lack of public transport, barriers to access, poor infrastructure

The response rate appears to be significantly lower than the number of responses to the Cairngorms National Park Authority (CNPA) NPPP consultation in 2022. That is partly because the CNPA made more efforts to engage and has better relationships with stakeholders but is also I believe a consequence of the meaningless consultation system. The Scottish Government and public authorities have conducted endless consultations on policies, strategies and so-called "plans", most of which have ignored the concerns raised by respondents or made any difference, and people are now starting to realise that.

The LLTNPA has a particularly poor record in this respect and that is now coming home to roost. The best example is the LLTNPA's outdoor recreation plan which was first delayed for years ([see here](#)) before an anaemic set of proposals ([see here](#)). After a large number of people and organisations had devoted considerable effort to responding to the consultation ([see here](#)), the LLTNPA eventually announced it was ditching the plan but would incorporate revised proposals in the NPPP. That has not happened ([see here](#)) and the draft NPPP is devoid of meaningful content in respect of outdoor recreation ([see here](#)).

The message could not be clearer, responding to the LLTNPA's consultations has become a pointless exercise. How else to explain that only one comment has been submitted about Balloch on Common Place despite the 55,000 or so people who have objected to the proposed Flamingo Land development there?

The LLTNPA does, however, have a statutory duty under the National Parks Act ([see here](#)) to take into account comments made on the NPPP during the consultation period. It may therefore be still worth responding, either to highlight particular local issues that need to be addressed on the online map (areas with overgrazing, industrial forestry plantations, lack of visitor infrastructure etc) or to use the survey questions to question the legitimacy of the plan or whether it is fit for purpose.

The rest of this post considers the main failings in the NPPP and I will follow that up with a further post that considers why the LLTNPA's NPPP and plans more generally say so little.

A plan without foundations

The information contained in LLTNPA's draft NPPP and the accompanying documentation about the current situation in the National Park could at best be described as random. This contrasts with the Cairngorms National Park Authority which in 2021 published a series of Fact Sheets to accompany every aspect of the consultation on its NPPP ([see here](#) for an example on land management).

While each main theme in the plan has sections headed "current situation" in most facts are few and far between. For example, under Enabling a Greener Economy and Sustainable Living there is just one half-fact, that the population for the National Park is projected to fall further, from 14,700 to 14,300:

WHAT IS THE CURRENT SITUATION?

At the time of drafting this plan, businesses in the National Park are experiencing some of the most difficult operating circumstances in a generation, brought about by adjusting to Brexit, COVID-19 and the current cost of living crisis. The National Park Destination Group comprises local tourism business representatives from across the National Park who say that escalating operating costs, skills shortages and recruitment challenges are being experienced across all sectors, with the tourism and hospitality sectors requiring to make changes to operating models, either reducing or scaling back on their business hours or service provision at a time when visitors are returning to the National Park.

Availability of local housing for staff and good public transport links are compounding factors affecting the ability of businesses to attract and retain staff. However, the current fiscal operating environment, specifically current levels of business rates and VAT levels, are stated by many businesses to be the key issue impacting on both short and long-term planning, alongside responding to legislative changes during the current parliamentary term including the consideration of a Local Visitor Levy and Short Term Let Control areas.

Many businesses are taking steps to reduce their carbon footprint by making changes to their energy usage and waste systems and supporting local supply chains.

Business collaboration and projects within the visitor economy sector are also supporting citizens to make greener choices and supporting behaviour change.

This sector has a significant role as ambassadors for the National Park through their interaction with visitors and opportunity to connect with a broad range of people.

This economic transition is also occurring at a time when the National Park is experiencing an aging population and loss of working age and young people. The most recent projections indicate a decline in population overall from around 14,700 (2018 estimate) to 14,300 by 2028. However small area population forecasts suggest this will differ between communities with some experiencing population increase. Engagement with young people through the National Park Youth Committee suggests that they may find it hard to know what skills are going to be needed and, aside from hospitality sector, what job opportunities are likely to be available to them within the National Park.

Unlike the CNPA, no facts are presented about the economy (eg about wages) but instead the views of one sector of business, representing tourism, are reported as reflecting the current situation. That may or may not be true but without facts its impossible to tell.

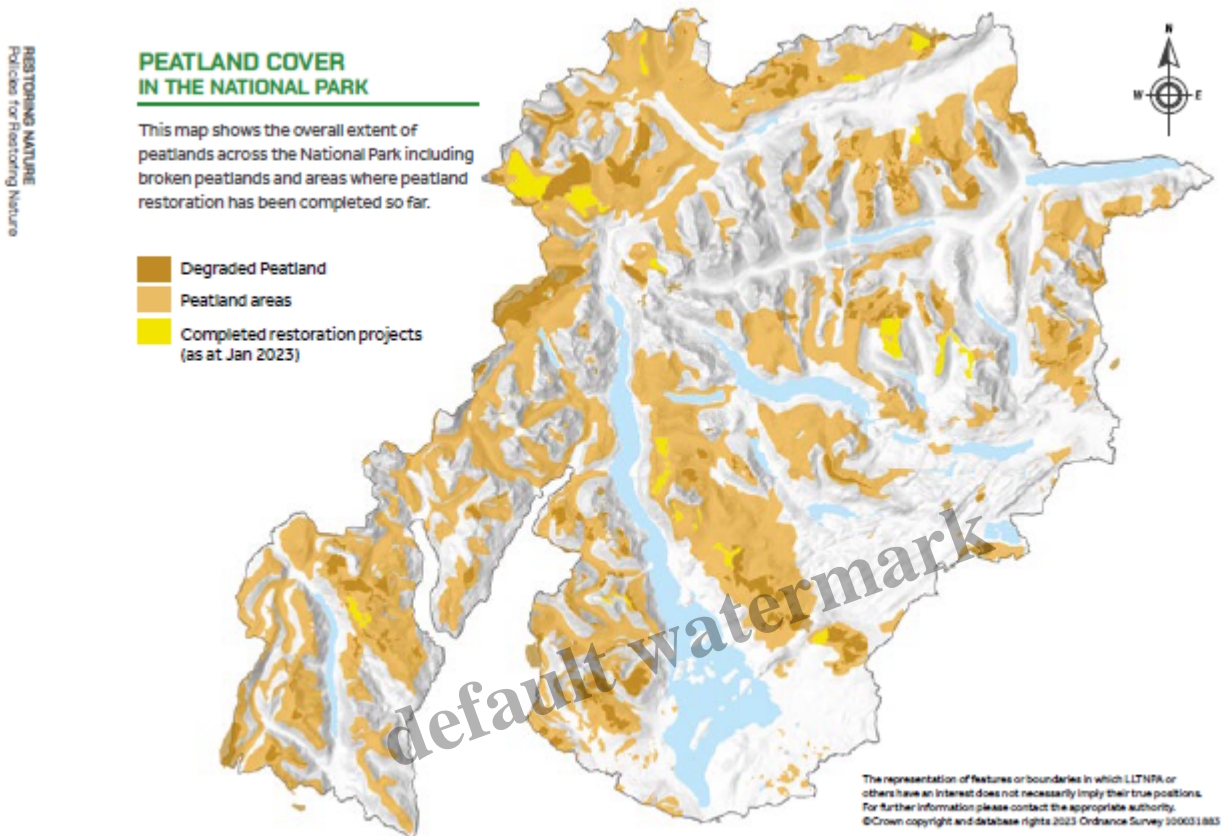
Many of the figures and statistics that are reported in the NPPP are from bodies like Visit Scotland and are for the whole of Scotland. They may or may not reflect the position in the National Park.

While there are a handful of mentions made to research conducted in the National Park, no references or links to that research is given. For example:

“The Footprint Assessment for the National Park completed in 2022 showed that visitor travel to and from the area is our single biggest source of emissions, totalling 290,978 tCO₂e per year, nearly half of the overall footprint. The assessment’s suggested pathway to net zero includes six categories of emissions reduction targets. Visitor travel to and from the area has the largest baseline of the categories at 34%.”

This particular research is very important not just in itself but because the draft NPPP contains suggestions that the LLTNPA should curb visitor car use. It has not, however, been made available as part of the NPPP consultation and is therefore impossible to scrutinise.

Arguably, the best factual information in the NPPP is in the maps on pages 57-59 (woodland cover, peatland and ecological status of water bodies) but no further information is then provided to explain or interpret what is going on:



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It is important, for example, to understand the reasons for peatland being degraded in order to decide what to do about it: how much is natural, how much due to overgrazing, how much due to other human impacts?

A plan out of context

While the draft NPPP contains a diagram showing that it is the overriding plan for the National Plan no attempt is made to relate its content to other plans.

Most importantly, the draft NPPP is completely silent about what the 2018-23 NPPP: what was achieved; what has been learned; and what needs to change as a result. In other areas of planning – like procurement for example – the mantra is Analyse, Plan, Do, Review. What the LLTNPA has DONE over the last five years is completely missing from the plan as is any attempt to REVIEW this. There was a time when the Scottish Minister responsible for National Parks personally reviewed the NPPP each year at a public hearing but since that was discontinued there has been no accountability.

The failure goes wider than that though. There are references in the NPPP to other strategies and plans, like the Woodland and Trees Strategy ([see here](#)), which is supposed to cover the period 2019-39. So what has that achieved to date and what in that strategy now needs to be changed as a result of the LLTNPA taking the climate and nature crises more seriously? The NPPP is silent on these issues, a missed opportunity but also an indication the LLTNPA appears incapable of ensuring even its own planning documents join up.

A plan without partners

That disconnectedness extend to the LLTNPA's relationship to its "partners", particularly other Public Authorities. A primary purpose of National Park Partnership Plans is to ensure that everything done by other public agencies within the National Park boundaries joins up and supports its objectives.

Yet the input from public agencies to the draft NPPP (it was the same with the last plan) is almost non-existent. There is nothing to say how Forest and Land Scotland (FLS), the largest landowner in the National Park, plans to change the way it manages its land for nature or as a result of climate change (nor what it will do to support outdoor recreation). There is nothing to say what NatureScot, responsible for protected areas, plans to do to ensure they are "in favourable condition" or how it plans to manage the land it owns in the Loch Lomond National Nature Reserve. There is nothing to say what Transport Scotland plans to do to ensure train services to the National Park improve. Or what Scottish Water proposes to do at Loch Katrine and so on for a host of other agencies.

Aside from FLS, the largest and most significant gap is the lack of any input from local authorities. But then the LLTNPA has proved incapable for more than a decade of ensuring a co-ordinated approach to issues such as litter management and parking provision which are also the responsibility of local authorities. The NPPP should be the mechanism that the LLTNPA uses to sort these issues out but instead they have yet again been avoided.

Instead of building other public authorities plans into the draft NPPP and using the consultation process to iron out the contradictions and conflicts, the LLTNPA is consulting those public authorities at the same stage as the wider public. In the unlikely event those authorities did come up with significant new proposals, there will be no chance for the public to comment on them.

A lack of analysis

Without factual foundations any meaningful analysis of the current situation in the National Park or what actually needs to be done is almost impossible.

Most of the sections on the "current situation" say far less about the National Park than they do about the legislative and financial framework. The resulting "analysis" makes all the right policy noises from a Scottish Government perspective without saying what needs to change:

WHAT IS THE CURRENT SITUATION?

Much of our rural land is used for production such as farming and forestry with national level policies, regulation and funding mechanisms directed to supporting the supply of food, timber and related products. But this picture is changing.

Whilst the production of food and timber is essential for us all, there is recognition that the consequences of some land management activities, such as unsustainably high grazing pressure from livestock and wild deer, aren't compatible with new climate and nature goals. Some land managers are shifting how they do things, and, in some areas, more communities are getting involved in decisions around land use.

In terms of funding there are uncertainties and opportunities.

The global movement to address climate change has also captured the attention of financial markets and this has been reflected in increasing land values in the Park linked with carbon. As well as a growth in small-

scale renewable energy production, such as hydro-electric schemes, over recent years there has been growing interest in creating carbon markets to invest in activities that help capture (sequester) carbon as a means of offsetting the emissions that remain once businesses have fully reduced the carbon footprint of their activity. This is a potential income stream for landowners. And it is hoped that similar schemes will be developed for nature with biodiversity credits too. These growing carbon markets are increasing land values and driving some land purchases across Scotland.

As well as private finance, the future of public funding for agriculture could also be changing. The Scottish Government has consulted on an Agriculture Bill, with implementation expected by 2026. Through this process there is a need to consider whether some incentives traditionally applied to agriculture should also apply to land uses delivering nature and climate outcomes.

While there are opportunities for land managers, it is also recognised that this range of uncertainties may be inhibiting land managers from committing to making

changes that affect land and will be needed to address the twin climate and nature crises.

Another challenge is in skills and capacity, where it is clear there is a gap to be addressed in order to deliver the scale and pace of change needed. This includes contractor capacity to deliver peatland restoration, woodland planting, wild deer and invasive species control at scale, and other nature restoration projects. A sustainable pipeline of long-term publicly or privately funded projects will be needed to build confidence for existing contractors and new businesses.

The Scottish Government is keen to see communities engaged further and greater transparency in land management decisions. There has been consultation on further proposed Land Reform measures around this, such as, for example, a potential requirement for landholdings over a certain size to prepare compulsory land management plans. The National Park Partnership Plan should have a key role in guiding such plans, building on examples such as the Strathard Framework.

For example, “the recognition” that high grazing levels are incompatible with climate and nature goals – which is repeated throughout the plan making it sound as though the LLTNPA has taken this to heart – is not accompanied by any factual information about deer and sheep densities across different areas nor does the LLTNPA say anything about what those numbers should be (the CNPA draft NPPP by contrast contained targets for maximum average deer densities).

The failure to analyse goes deeper. To return to the peatland map, while it does provide an indication of the areas where peat could be restored, without knowing the causes of this there is no way of telling whether the proposed solution (using government money to pay for contractors to do restoration work by machine) is sensible or will work. There is no point trying to restore peatland damaged by grazing animals unless the numbers grazing in those areas is reduced.

A plan without meaningful objectives and actions

The draft NPPP includes aims for 2045 and objectives and actions for 2030, a year after the plan will have finished! Here is the example for “Shaping the new land economy”

AIM BY 2045

The National Park is an exemplar of a new form of best practice land use and management, where climate action, nature restoration, local produce and green jobs bring benefits for all.

OBJECTIVES BY 2030	ACTIONS
Land Use Change To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs.	Facilitate a Regional Land Use Partnership and prepare a Park-wide Land Use Framework setting out collaborative land use change objectives and priorities across multiple land holdings at a landscape scale. Promote the integration of land use and development priorities and opportunities within emerging area-based strategies prepared through the new Local Development Plan. Facilitate strategic, joined-up planning for larger land holdings (or multiple neighbouring holdings), incorporating the business and investment opportunities coming from climate and nature restoration land use changes. Encourage and support land managers to shift more suitable land towards low carbon and regenerative agriculture as a primary purpose.

The aim is full of fine words and phrases (exemplar, new, best practice, benefits for all) but what does it actually mean?

And what does the objective actually mean? How, for example, will FLS “Transform over time” their landholdings and what is involved in “delivering much more for climate and nature”?

As for the actions, there is not a single action that promises to change anything. They are all about facilitating partnership – the LLTNPA missed the opportunity to show it could do that while drafting the plan – promoting this and encouraging that. None of these things are “actions” and it is highly questionable whether any will make any difference. In the early years of the National Park, for example, the LLTNPA tried to get estates to develop integrated land management plans – I had to appeal to the Information Commissioner to get a copy of the one for Glen Falloch – but the whole initiative was dropped without explanation. What has changed that would make such an approach work now?

A plan without resources is not a plan

Large sums of public money are still spent in the National Park each year despite austerity. These could, if used in the right way, make a considerable difference. While acknowledging the issue of rural grants, the plan fails to make any proposals about what needs to change. To quote one of the slogans at the start of the plan back to the LLTNPA, “if not now, when?”

While taking on other public authorities like FLS would require a real battle, the LLTNPA really has no excuse for failing to say what resources it needs as a National Park Authority to deliver its objectives and how it would intend to deploy them over the next five years. It should be blindingly obvious that whatever is in the NPPP, unless the LLTNPA has the appropriate resources in place they won't be achieved. So why the silence?

The fact the draft NPPP says nothing about resources confirms my main contention, the plan is devoid of meaningful content and not worthy of a National Park. The Minister should step in and sort the

LLTNPA out before they are allowed to go any further.

Category

1. Loch Lomond and Trossachs

Tags

1. flamingo land
2. Forest and Land Scotland
3. Governance
4. LLTNPA
5. NatureScot
6. outdoor recreation
7. planning
8. Tourism
9. vision for National Parks

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