



Scottish Council for National Parks

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Loch Lomond and the Trossachs
National Park Authority
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Dear Sirs

NATIONAL PARK PLAN CONSULTATION

Preface

The Scottish Council for National Parks (SCNP) was formed originally in 1943 and operated until 1967, when it was stood down as a result of the setting up of the Countryside Commission for Scotland. It was reconstituted in 1990 following the publication of the CCS's report on the 'Mountain Areas of Scotland' for Government, which recommended the creation of National Parks in Scotland. The SCNP's primary aim is to promote the protection, enhancement and enjoyment of nationally outstanding areas that are National Parks, or are appropriate to be designated as such, or are of sufficient merit to warrant special protection. This is manifest in our support for good stewardship of the country's best environmental assets and encouragement of sustainable methods of development, particularly within areas of national park potential. SCNP is a registered Scottish Charity.

Introduction

The Scottish Council for National Parks (SCNP) is glad to have the opportunity to comment on the Park Authority's draft National Park Plan. We have studied the plan in the context provided by the State of the Park Report and wish to record our appreciation of the thoroughness with which both documents have been prepared. We find them comprehensive and recognise the efforts which have been made to provide an integrated approach in which policies have to be seen as linked and contributing to the wider strategy for the Park.

Comment

All our comments should be seen in the context of a largely favourable reaction to the draft Plan and our suggestions are made in the spirit of a 'critical friend'.

It is very important that any National Park Plan should be based on sound survey information and analysis so that policies and decisions based on those policies, can be made reflecting the best that is available at a point in time. We believe this has been largely achieved. However, if we have reservations, they relate to the sense of caution that pervades the document and concerns that the resources to carry through the desirable aims of the Plan are likely to be seriously inadequate.

The caution can be seen in the approach which has been adopted to difficult issues such as the use of sea planes and jet skis. The Plan does not resolve these issues but leaves them to be resolved when,



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inevitably, challenges are made in the future. If the policies on such issues are not spelt out in the Plan, which has to be approved by Scottish Ministers, it will be left to the courts. This would be costly and based on past experience, may well not reflect the proper aims of a National Park. If the policies are clear and in an approved Plan, they have the primacy of an approved plan to sustain them.

The other fundamental issue is that of resources and the ability to deliver the wide range of actions set out in the Plan. Many of the actions are dependent for their success on the active support and participation of outside bodies. The role of the Park Authority will in many cases be that of stimulator and co-ordinator. Past experience suggests that this is very time consuming and places an enormous burden on staff resources let alone finances. A strong case should be made to Scottish Ministers to ensure that the Plan when approved, is binding on other Government Departments and affected Local Authorities.

Finally on resources, there are so many actions that are regarded as a high priority, it seems wishful to think that they can all be achieved with the present level of resources both staff and money. A strong case on resources needs to be made to Scottish Ministers. If Scottish Ministers really do see National Parks in Scotland as one of the flagships of environmental policy and rural sustainability, they will have to be persuaded that the money currently available is inadequate and could result in the failure of the process. Scotland, through both the Westminster Parliament and more recently through the Holyrood Parliament, has long trumpeted the unique quality of the landscape in Scotland whilst at the same time neglecting to resource change and management properly. The consequences of failure to face up to this issue need to be spelled out in making the case for resources.

Because this is the first Park Plan for the first National Park in Scotland, the clarity and determination with which it sets out the approach to developing and managing the Park may well set the tone for other Plans elsewhere in Scotland. It is imperative therefore, that it is bold and stimulates in others the wish to develop the Park in a genuinely sustainable manner to conserve one of Scotland's prize environmental assets for future generations.

Yours faithfully

Robert Maund

Attachment:

More detailed comments on individual sections of the Plan