

Attachment to SCNP letter in response to consultation on Loch Lomond and the Trossachs National Park Plan 2005.

Detailed comments on various chapters of the Plan.

General comment on the format and readability of the Plan

- The format of the plan is well designed and easy to read
- Cross referencing is good
- Illustrations are relevant and helpful to the elaboration of text
- Comprehensive and gives the impression of balance and 'joined up thinking'
- User friendly, despite its bulk

Chapter 1 Introduction

Clear and easy to follow, especially the Structure of the Plan and Figure 4 Hierarchy on page 16.

Chapter 2 Perspectives etc

Para 2.7 [page 21] states '*...adopting a sustainable approach in its broadest sense.*' But the definition of sustainable development quoted throughout the plan is much narrower than that set out in the source document of the Brundtland Report 1983. This amplified the definition of sustainable development given in the Glossary to this Plan:

'At a minimum, sustainable development must not endanger the natural systems that support life on earth: the atmosphere, the waters, the soils and the living beings.'

In the context of a National Park, it is important that the full Brundtland definition is used.

Similarly in para 4.72 [page 158], emphasis is placed on a comprehensive use of '*The principles of sustainability..*'. But these principles do not appear to have been explained anywhere in the Plan. An excellent exposition of these principles is given in: *Sustainable Development and the Natural Heritage: The SNH approach 1993*. We recommend their adoption [or adaptation] and promulgation by the Park.

Para 2.8 [page 21] - Applying the Precautionary Principle. The last sentence could be usefully modified e.g. '*...precautionary principle may be reviewed if information suggesting scientific or other data certainty becomes available*' [SCNP underline]

Guiding Principle 7 [page 23] Mediation techniques might usefully be included.

Chapter 3 The Special Qualities These seems comprehensive and acceptable.

Chapter 4.1 Managing Resources

The Vision [page 47] seems acceptable.

The Landscape and Cultural Heritage Boxes [pages 47/48]. Perhaps these should also specify the restoration of landscapes, e.g. the removal of plantation forests to recreate open landscapes, the removal of inappropriate and poorly designed recreational developments in sensitive locations etc

Chapter 4.2 Landscape

In general, the Landscape Policies are reasonably clear and acceptable, but the Action Plans [pages 71 –73] seem rather general. There needs to be actions specifically targeted to the identification and removal of 'eyesores' that detract from the special

qualities of the Park and these should be given high priority, wherever possible. Also, what is the time scale for actions not listed as High Priority – the reader is left to wonder?

Policy LS2 [page 53] This might include a statement along the following lines: ‘The design of forest margins to create a naturalistic appearance, especially the upper margin with open ground’

Policy LS3 [page 53] This might include a statement along the following lines: ‘The design of forest margins to create a naturalistic appearance, especially the lower margin with open ground’.

Policy LS4 [page 55] Para (a) after ‘*forest design guidelines*’ ADD ‘derived from the UK Forestry Standard’. This would give more authority to this statement.

Policy LS6 [page 56] Consider the use of woodland TPOs.

Para 4.2.25 [page 57] New specimen/parkland trees also need protection from grazing animals especially cattle.

Policy LS9 [page 58] Guidelines on the various issues would be helpful.

Policy LS13 [page 62] Restoration should also be included.

Para 4.2.67 [page 69] Private forestry planting without grant aid is outwith any control by any agency. Although it does not occur often, even badly designed/located small plantings can have severe detrimental effects. This should not be acceptable in a NP context.

Actions for landscapes [pages 71 –73]

NC4 suggest High Priority

NC9 suggest High Priority as relatively easy to implement

NC13 some commercial forests could be identified as ‘special’ e.g. those that have had longstanding attempts to improve their design and have contributed to the principles of forest design now included within the UK Forestry Standard – early advice from Dame Sylvia Crowe, the FC’s first Landscape Consultant appointed in 1963.

.4 Biodiversity and Geology

This is wide ranging in its scope and covers most of the issues. Perhaps, given the status of the national park, the need to be seen to be taking a lead and the increasing boldness of the statutory agencies on the issue of **species re-introduction**, this issue should be given a place in the scheme of things.

The proposed actions are too unfocused. It would be better to categorise into urgent, ‘*must do within timescale of the Plan*’ and desirable.

Also, the scientific effort is underplayed. There are issues here which have been researched for 50 years and more. We need a model of ‘*Action-based research*’ which allows research findings to be fed into resource management decisions.

Policy BD23 on Community Participation is crucial in securing ownership of the issue by the Park’s communities. The role of an iconic species such as the Sea Eagle on Mull to

change perceptions of biodiversity within the community should not be overlooked. The Capercaillie or Osprey or some future reintroduction, could do the same for the Park. The Policy should be strengthened by relating it to the Park ranger service and their involvement with schools.

Section 4.5 Integrated Land Management

Figure 7 shows 'Core Land Management Activities' but excludes a prime user of land i.e. water catchment. This is picked up in Section 4.6 but the conditions of use are now more constrained under WFD, which in turn offers an opportunity to hang this particular part of land management on an organic peg, using the *imprimatur* of the National Park.

Policy LM 4 The NPA should examine the possibility of a 'one stop shop' for grant aid for land managers. This would allow the NPA an important lever in developing the right messages to farmers and others about farm diversification, biodiversity and other agri-environment measures.

Within **Policy LM 8**, there should be some reference to biomass production, which coincidentally has a heritage perspective in that 18th and 19th century oakwoods around Loch Lomond were formerly used as an energy resource for iron smelting.

Reference to a demonstration farm at Proposed Action **NC 122** should be widened to the concept of a demonstration estate to enable a wider range of objectives to be secured. NTS has much experience in this field.

Section 4.6 Water and Fisheries Management

The Water Framework Directive largely secures NP objectives in terms of whole catchment management and the need for safe clean waters.

Under **Policy WM 9**, flood prevention should have a presumption in favour of naturalistic solutions (i.e. not engineered) to containing rivers.

Policies **FM 1** to **FM 4** concentrates on freshwater fisheries. There is potential for marine fisheries which must be addressed. Modern technology could be employed to produce shellfish farms which are invisible to on-shore observers. Other traditional methods of bottom farming are also now updated by using divers to hand-pick shellfish. Even with finfish farming, ranching as opposed to cage farming would offer acceptable, sustainable models.

Policy FM2 seems weak. A byelaw ban should be investigated at the very least.

Section 5.4 Raising Awareness and Understanding of the Park

We have not picked up anything on signage in either this section or in Section 5.3. Wherever it is in the document, it should relate to this section, since it is a crucial part of awareness.

The section refers to the importance of an integrated approach to interpretation and learning (**Policy RA 3**). This integration should be vertical as well as spatial so that there is logical progression in the visitor experience.

Interpretation appears to be a top-down affair where the NPA takes charge and provides. This is to miss an opportunity for participation in the process by the Park communities. The value of this is the opportunity for the people who live and/or work in the Park to take ownership of the process by identifying the heritage and contributing to story lines etc., thus reinforcing the significance of the heritage and the value which is placed on it.

Chapter 4.7 Using Resources Wisely

In general, these policies and actions are acceptable.

Policy WA1 [page 165] should some comment be included about current practices e.g. landfill, incineration?

Policy TR3 [page 171] Green Travel plans do not appear to be explained – car sharing, unleaded fuel, public transport wherever feasible?

Chapter 5.1 National Park Experience

This seems acceptable.

Chapter 5.2: Balancing Recreation Opportunity with Sustainability

The long term aim [para 5.2.1 page 181] and the strategic objective [para 5.2.2 page 182] appear to be acceptable.

Policies REC1, VM1, VM 2, VM 3, VM 4 [pages 182,183, 184] all seem to be sensible and acceptable.

Schedule 1 Strategy and Priorities for Visitor Management [pages 185, 186] all seem to be sensible and acceptable.

Para 5.2.10 [page 187] states that a precautionary approach will be adopted in relation to the impacts of motorised recreational activity, which is good.

Para 5.2.11 [page 187] is to be commended for aspiring to an exemplary approach to the provision and management of recreation and access.

Policies REC 2, REC 3 [page 187] – 2 is acceptable and 3 is good.

Schedule 2 Strategy for Outdoor Recreation Activity on Land [pages 189 – 194]. Again these all seem sensible and acceptable.

Policy REC 4 [page 195] Support in principle, but an explanation is needed as to why there appears to be a duplication of new strategic link paths with the existing West Highland Way e.g. between Crianlarich and Tyndrum [3 link paths including WHW] and between Inverarnan and Crianlarich [2 link paths including WHW]. Are these new paths intended to relieve particular pressures on the WHW in these sections or are they to develop new walking experiences or what? There is a read across to Policy REC 5 (b) 'are compatible with existing route provision' [page 196].

Policies REC 6 REC 7, REC 8 [page196] are all commendable.

Para 5.2.13 – Managing Outdoor recreation Activity on Water [page 196] usefully mentions the Sandford Principle in the last sentence.

Para 5.2.14 – Consultation on Seaplane Byelaw for Loch Lomond [page 197] will the consultation results on the Seaplane Byelaw be included with the other Byelaw consultations w.e.f 8 August?

Para 5.2.16 and Policy REC 9 [page 198] appear to overlook the operation of the steamship on Loch Katrine?

Policy REC 10 [page 198] last sentence is weak ‘...voluntary codes have been proved over time to be ineffective, the preparation of byelaws will be considered’ [SCNPunderline]. Suggest Delete ‘considered’ Insert ‘introduced’

Policies REC 11, REC12, REC 13, REC 14 [pages 198, 199] all seem to be acceptable.

Policy REC 15 [page 199] 1st sentence ‘Impacts....will be minimised’ contradicts ‘..impacts..are prevented’ in last sentence of Para 5.2.17 [page 198]. Providing improved infrastructure to deal with sewage from other water recreation users also needs to be considered, as well as that from boats. Toilets and waste disposal points near shorelines need to be sensitively located and well designed to minimise visual impacts.

Schedule 3: Strategy for Management of Water Recreation [page 200] this seems to be sensible.

Policies TR 5, TR 6, TR 9, TR 10 [pages 205, 206] all seem to be acceptable.

Policy TR 8 (b) Visitor Parking Provision [page 205] To encourage people to leave their cars and become involved in sustainable recreation activities will require the provision of secure, long stay car parks placed in strategic locations throughout the Park.

The Strategic Objective for Improving the Recreation Balance [page 206] appears to be acceptable.

Policy REC 16 [page 207] seems acceptable.

Policy REC 17 Responsible Behaviour [page 207] How to achieve responsible behaviour amongst Park users is clearly important and many references are made to this. Yet in none of the solutions is the use of Park Rangers/Wardens specifically mentioned! Rangers in particular are trained [or used to be by CCS] in the use of inter personal skills and communication and interpretive techniques. In SCNP’s view, a well trained and resourced Park Ranger Force would be a key element in delivering policies for good behaviour and interpretation.

Policies REC 18, REC 19, MON 1, MON 2, MON 3 [page 208, 209] all seem to be acceptable.

Actions for Balancing Recreation Opportunity with Sustainability [pages 209 –211] all seem to be sensible.

Chapter 5.3: Providing a Valued Quality Experience

The long term aim [para 5.3.1, page 212] is acceptable.

Policies REC 20, REC 21 page 213] are acceptable.

Strategic Objective for providing a [include 'High' in title] Quality Infrastructure [page 214]. In the first line after 'provide' Insert '**and design**'

Para 5.3.5 [page 214] The encouragement of sustainable recreation activities e.g. walking and cycling is deemed to be important. Yet the creation of new routes appears to be dependant on '*...available resources for maintenance*'. This seems to be somewhat laid back – **what efforts are being made to secure sufficient resources to deliver the key aspects of this Plan?**

Policy REC 22 [page 215] The importance of good design should be emphasised: In 1st line of policy, suggest after '*The provision..*' Insert '**design**'.

Policy REC 23 [page 23] is acceptable.

Policy REC 24 [page 215] Providing a quality recreation experience from a path network requires more than just '*..adopting design and construction standards..*' Criteria for an holistic recreation experience need to be devised e.g. route selection to diversify the experience, the blending of the alignment with land form, the treatment of the forest edge [thinning, visual penetration into the forest and views out] especially on paths through commercial forests, etc.

Policy REC WA7 (a): Strategic Approach to Litter [page 215] and Para 5.3.8 [page 214] Again Park Rangers could be an important tool '*to promote responsible behaviour...to deal with litter*'.

Policy TR11 [page 216] seems acceptable.

Strategic Objective for Experiencing the National Park Safely [page 217] is prudent and acceptable.

Policy REC 26 [page 218] The use of '*promoted*' [1st line] and '*encourage*' [sub para (e)] is considerably weaker than '*To ensure...in a safe manner...*' [in the Strategic Objective for Safety [page 217]. Suggest '*encourage*' is replaced by '**direct**'

Policy REC 27 [page 218] weaknesses similar to REC 26. Suggest '*Promoting*' [in sub para (a)] is replaced by '**Require**'.

Actions for Providing a Valued Quality Experience [pages 218, 219]

Actions NPEX 19, 20, 22, 24 perhaps should be considered for High Priority status as litter, interpretation and integrated transport have all been previously plugged as being important?

Chapter 5.4 Raising Awareness and Understanding of the Park

The long term aim [page 220] is sensible and acceptable.

Para 5.4.4 'The Spark in the Park' [page 221] interpretation strategy for the Park should be an important document.

Para 5.4.7 and Policy RA 1 [page 222] Again Park Rangers could be a key tool in the delivery of interpretation policies, but are not specifically mentioned.

Policies RA 2, RA 3, RA 4, RA 5, RA 6, RA 9, RA 10. [pages 222, 223, 224, 225] all seem to be sensible and acceptable.

Policy RA 7: The Arts in Education [page 225] is welcome and the recent BBC 1 TV programme by David Dimbleby 'A Picture of Britain' contains an interesting approach to this subject.

Policy RA 8 (b) [page 225] SCNP would be willing to discuss whether it might contribute here.

Policy RA 11: Promoting Sustainable and Responsible Behaviour [page 226]
Again Park Rangers could be a key tool in the delivery of these policies on the ground, but are not specifically mentioned.

Actions for Raising Awareness and Understanding of the Park [pages 227, 228]
Actions NPEX 38 and 40 might be considered for a higher priority as these could deliver easy and rapid benefits.

Chapter 6.4 Developing Quality etc

Para 6.4.1; 6.4.12: Policy LD2 [pages 288,292, 300] Although the character of a place includes its setting, the setting is an important component that can be easily degraded by inappropriate development and coalescence between settlements. More emphasis should be given to safeguarding the attributes of setting throughout this chapter. Should mini Green Belts be considered?

Para 6.4.2 and Policy DQ1 Raising Design Quality [page 289]
It is important to include raising the design quality of extensions, alterations and conversions to existing buildings and structures.

Schedule 5 – Settlements [pages 293-298]
Is sufficient emphasis given to the adverse visual impact of some local authority housing in certain settlements e.g. Balloch ageing, grey wet dash, poorly maintained properties?

Actions [page 301]
CL 69, 70 should these be high priority?

Chapter 7: Working Together to Deliver the Plan

This is an important chapter. **It poses the question about whether there is a role for the SCNP and indeed the Friends of Loch Lomond in the delivery and monitoring of the Plan**. Para 7.14, 7.16 – Special Interest Groups and Forums [page 313] - Could this involve SCNP?

Additional comments on 5.1, 5.2, 5.3, 5.5

Generally welcome the emphasis and approach to recreation but with some misgivings.

Concerned with the emphasis of the first of the four themes- "Balancing Recreation Opportunity with Sustainability". This suggests that recreation cannot be part of sustainability but rather it is something outside it – a barrier. This gives the wrong emphasis to the content that follows. It should probably say something like "Enhancing and promoting sustainable recreational opportunities".

There seems to be an emphasis on the problems rather than the opportunities.

Need to explore what is meant by "managed access". Needs to be more than "please keep to the path" – must be compatible with the Land Reform Act.

There is a lack of firm commitments on access infrastructure that probably comes down to funding. **Recent visit to LL&T confirmed a real lack of resources to actually do much for access on the ground.**

Needs more emphasis on making visitors more active – i.e. using paths rather than sitting by the roadside. It does make the link to health?

Should Arrochar and East Loch Lomond be identified in the same category as the issues and solutions are different?

- at Arrochar the issue is one largely of impact on paths etc and the solution includes path repair, alternative route promotion etc.
- at East Loch Lomond there are issues of this type but some of the high profile concerns are more to do with sheer numbers of people and anti social behaviour. The solutions here are somewhat different – including traffic management / transport planning and policing.

There should be more stress on positive encouragement of recreation in quieter areas to take pressure off the congested areas.

Needs to emphasise outdoor recreation (rather than shopping experiences) when talking about the visitor experience.

There is not enough emphasis on delivery – e.g. on core paths they have a statutory duty to draw up core path plans in 3 years but this is not spelt out. National Parks need to be setting the example to all other local authorities with the excellence of their path plans.

Should be more emphasis on off road walking and cycling routes between communities over and above the strategic routes mentioned.

Also needs to make clear they will support community path networks and local access initiatives (as well as core paths).

They need to make clearer links with LMCs, forestry funding etc and outdoor recreation.

There should be more mention of the role of NGOs and volunteers in delivering on the plan.