



The Granary  
West Mill Street  
Perth PH1 5QP  
Tel: 01738 493 942

NPPP Public Consultation by email to [nationalparkplan@lochlomond-trossachs.org](mailto:nationalparkplan@lochlomond-trossachs.org)  
Loch Lomond & The Trossachs National Park  
Carrochan  
Carrochan Road  
Balloch  
G83 8EG

29 June 2017

Dear Sir

## **CONSULTATION RESPONSE TO THE DRAFT NATIONAL PARK PARTNERSHIP PLAN: 2018-2023**

### **1. Introduction**

Mountaineering Scotland welcomes the opportunity to respond to the draft plan and we comment here on those matters which are of direct relevance to our members. We represent the interests of mountaineers and hill walkers in Scotland and have a growing membership of over 14,000 direct members. We also represent the interests of more than 85,000 members of the BMC (British Mountaineering Council) which provides financial and policy support for our work on issues affecting access rights, landscape and related planning issues in Scotland.

Following initial observations in paragraphs 2 and 3 below, we respond to consultation questions in the format and order requested.

### **2. Partnership working**

As a general comment, we note that the draft plan does not refer to any recreational organisations as partners in the context of delivery. This may be accident or design. If it is the latter then it marginalises an important and influential body of opinion which represents a wide range of users of the national park and which could assist the Park Authority (PA) to achieve the aims of the Partnership Plan through a range of initiatives including education and communication.

### **3. Policy on engagement**

Whilst we welcome the opportunity to engage with the consultation, we have found through our experience of the PA's past engagement on, for example, the Your Park initiative and related camping management byelaws that such consultation has in practice been sub-optimal, as concerns and objections raised by recreational organisations have been ignored in reaching final decisions.

We are concerned that the PA has failed to accurately communicate the extent of concerns raised by recreational and other representative organisations at Stakeholder Group meetings relating to provision of camping places, suitability and readiness of sites and related communication issues.

Therefore, we question the real willingness of the PA and its management team to work in partnership with recreational organisations and to build trust and positive relationships with such stakeholders.

#### **4. Introduction to the Plan**

The introduction refers to the 'last National Park Partnership Plan 2012-2017' and we note that there has been no formal review of progress against that plan published on the PA website since 2014. We have also been unable to identify any references to the 2012-2017 plan in the Strategic Environmental Assessment relating to the 2018-23 Plan. We assume that a review is a fundamental requirement of the Scottish Government not only to enable progress tracking but also to put the draft 2018-23 Plan to be put into proper context.

#### **Consultation Response**

#### **CONSERVATION**

##### **Do you agree with the overarching Conservation vision?**

- We believe the draft plan lacks a coherent vision for the upland landscape of the Park.
- Based on our experience of hydro schemes to date, there is a need for a step change improvement in how the PA planning team applies itself to the approval, restoration and mitigation of tracks for hydro schemes which clearly fail to meet appropriate environmental standards. We cite the Glen Falloch scheme as a prime example of environmental degradation caused by a hydro scheme approved by the planning authority.

##### **Do you agree with the 4 Conservation outcomes?**

- See comments.

##### **Do you agree with the 11 Conservation priorities?**

- We comment below on outcomes 6 & 10.

##### **Do you have any specific comments on the priorities or outcomes?**

- The stated success criteria are vague and could enable the PA to define almost anything as success in 2023. This applies to all outcomes.
- Outcome 1: There is clearly a tension between the drive by the Scottish Government for increased timber production and the need to restore landscape scale forests following harvesting and increase the planting of non-native species. The PA has a great opportunity to restore and improve such habitats by influencing forest plans and ensuring where possible that native species and forest design are used beneficially to enhance the landscape and move away from Sitka plantations. In this context, we believe the PA has failed to uphold the protection of oak woodlands already and we therefore have little confidence that the PA can achieve this outcome.
- Outcome 2: We are increasingly concerned that the PA use euphemistic language when talking about conserving and enhancing the landscape in the context of providing more opportunities for people to enjoy and explore them. If this means more rules, restrictions on access, more byelaws and more ridiculously high parking charges (e.g. such as at Luss) which penalise someone who wants to enjoy a day's hillwalking, then the impact on visitors will be negative.
- Outcome 3: This lacks any credible detail.
- Outcome 4: The creation of Regional Land Use Partnerships might meet the Scottish government's objective but we would question, based on present experience, the extent to which recreational

and environmental interests will be represented and their views considered as communities of interest.

- Priority 6: We remain fundamentally opposed to the camping management byelaws and have requested at the Stakeholder Forum that the PA ensure that recreational interests are permitted an opportunity to comment as part of the annual review process and reporting to Ministers.
- Priority 10: The PA should ensure that deer management plans include in their scope the consideration of the effectiveness of current arrangements for responsible access and improvements where necessary.

**Are there areas that you think are important and that are not covered by the priorities?**

- There is a lack of clearly defined outcomes and measures of success.

**Is your organisation willing to sign up to the delivery of the priorities and, if so, what/how does your organisation intend to contribute?**

- We are able to contribute to education and information provision through our communications and media team

**Are there other organisations that you think should be included as delivery partners?**

- Recreational organisations - see comment under Partnership Working above.

**VISITOR EXPERIENCE**

**Do you agree with the overarching Visitor Experience vision?**

- The vision statement requires some qualification as to what constitutes a 'high quality, authentic experience'. Camping management byelaws currently mitigate against the achievement of 'authentic' wild camping experiences; the byelaws mitigate against visitors from low income backgrounds.

**Do you agree with the 5 Visitor Experience outcomes?**

- We comment below on VE1, 3-5.

**Do you agree with the 20 Visitor Experience priorities?**

- We comment below on VEP 14 & 17.

**Do you have any specific comments on the priorities or outcomes?**

- Outcome VE1. The statement concerning a review of core paths mentions 'fit for purpose'. We would like to understand what the aims of the review mean for the current network of core paths and whether the PA has any plans to reduce the core path network.
- Outcome VE3. We recognise the importance of a robust local economy but this seems to be an over-riding objective of the PA in comparison with its environmental and conservation priorities. In a related context, there is an urgent need for greater expansion of publicly and privately-owned toilet, rubbish collection and campsite facilities within the Park, which remain inadequate to meet demand.

- Outcome VE4. We question the ability of the PA to act effectively in exercising 'management' of popular areas of the Park. We cite the debacle over byelaws which we learn after 4 months are not now applicable to campervans and motor homes, the fact that the suitability of camping spaces provided under the new permit system has been disappointingly inadequate and the PA's inability to use what was effective legislation prior to the imposition of byelaws. This does little to suggest the experience of visitors would be enhanced by further measures taken by the PA.
- Outcome VE5. The online permit booking system does not encourage visitors from all backgrounds as it relies on access to the internet and a bank account. In this regard, it is divisive and disproportionately off putting to low income visitors. Paradoxically, low income visitors are perhaps one of the more important groups to encourage into the Park (to realise the personal health and wellbeing benefits) as opposed to other, middle class, middle income visitors who come regardless.
- Visitor Experience Priority 14. We have stated or continued objection to the imposition of camping management byelaws above. What is still lacking is the adequate provision of toileting and litter collection provision at sensitive sites throughout the Park. The PA should develop a plan which specifically addresses these issues as a matter of priority otherwise the aim of a 'reduction in litter levels' will not be achieved.
- Visitor Experience Priority 17. We identify above the example of totally inappropriate car parking charges at Luss. The PA needs to ensure that traffic management measures such as parking charges are proportionate. Charges should not exclude people who want to use toilet facilities for a short time or park all day for a hill walk or similar activity. If this is not addressed the PA will exclude individuals and fail to meet Visitor Experience Outcome VE5.

**Are there areas that you think are important and that are not covered by the priorities?**

- There is a lack of clearly defined outcomes and measures of success.

**Is your organisation willing to sign up to the delivery of the priorities and, if so, what/how does your organisation intend to contribute?**

- We are able to contribute to education and information provision through our communications and media team

**Are there other organisations that you think should be included as delivery partners?**

- Recreational organisations - see comment under Partnership Working above.

**RURAL DEVELOPMENT**

- We make no response to the questions in this section.

Yours sincerely

**David Gibson**  
**CEO, Mountaineering Scotland**