

Loch Lomond & Trossachs National Park

National Park Partnership Plan Consultation response

Response by:

Kilmaronock Community Council

West Dunbartonshire

Response to:

NPPP Public Consultation

Loch Lomond & Trossachs National Park

Carrochan, Balloch, G83 8EG

www.lochlomond-trassachs.org/consultations

By: G MacLellan, Chairman

Checked by: N MacGregor, Secretary

Date: 22 June 17

Over view and summary

Kilmarnock Community Council (KCC) understand the aims of the LLTNP set out by the National Park (Scotland) Act. We feel the additional aims of contributing to National Government's aim as set out on page 6 will be a significant extension of its current responsibility and may not be affordable or achievable.

Additionally, we are not clear how the performance and accountability to the electorate will be measured and reported under present governmental structure.

We support the aims of the Plan, where achievable, in so far as they fall within the current responsibilities, measures and reporting mechanism by the LLTNP at present.

We note that many skills and resources that will be required to meet the Plan are not held by LLTNP but are held by other recognised organisations. We do not support duplication or the making of additional layers of administration and we support existing expert organisations to lead on their subject matter.

We note that many of the Priorities are Core Business to LLTNP. However the limitation today is "enforcement" of a consistent policy, not the need for a new one.

KCC would like to see the working method, structure and management plan to support the achievable objectives.

Overall we feel the Plan is overambitious and not achievable in many parts due to conflict with LLTNP's own regulatory objectives and other National responsible organisations.

Detailed response to the Plan

Conservation Outcomes

C1, C2 Conservation Priority - Habitats and Species

Priority 1 and 3

KCC consider this as core business for the LLTNP under its establishment and support. We comment:

Species: More focus on natural fish sustainability is desirable as this is a prime indicator of a sustained or improved environment along with other species counts.

Private landowners must be a lead delivery partner and consideration of their interests, time and resources is paramount to support a sustained economy.

The measures of this section do not reflect the objectives -for example the Land Management measure does not reflect the Priority.

The Loch Lomond & Trossachs Country side Trust is not a lead delivery partner – LLTNP has the responsibility.

KCC would like to see a funding plan for any activity that is out with the LLTNP current role.

C3 Climate change, Priority 3 & 4

KCC consider the Priorities 3 and 4 to be conflicting with the objective.

Dark skies enhancement is not related to climate change in this context. We support a dark skies policy where it has relevance to technical planning.

KCC support improved public/community transport networks that link together to provide for visitors and residents to reduce dependence on private cars.

KCC support the lead organisation for Roads should be the appropriate Government department and LLTNP should enforce its aims accordingly.

Developments such as Flamingo land will contradict this objective. Past developments such as Carrick Golf club have adversely affected this objective, dark skies, bat habitat etc. Any development will have an impact on climate change and dark skies policy but these need a numerical decision criteria, measures and enforcement to be effective.

The Measures do not address standard climate change benchmarks such as CO2 emissions, species counts etc.

Lead delivery partners should include private businesses and landowners which may include FSC.

C7 Priority 7 and 8 Flood management and water management

KCC support the lead organisation for Water management being SEPA and the LLTNP should enforce its own aims accordingly.

SEPA is resourced and has regulatory powers to achieve these Priorities at present.

KCC would support more defined scientific benchmarks. The Measures given are not sufficient nor are they definitive measures.

C9,10 and 11 Land use, Deer management, Land management plans

KCC question should LLTNP be responsible for delivering Government Policy under the National Parks Act – we think not? KCC consider the activity of the LLTNP only to be that directed by its Board and Members in accordance with the Act.

Private Land managers must be a lead delivery partner to ensure a sustained economy.

Existing organisations such as the Deer Commission are already leading active partners.

Private landowners have limited resources, applying a burden will be counter productive.

KCC suggest a cost benefit needs to be shown for any activity.

KCC suggest evidence of need is demonstrated.

Measures should be scientific and numerical – we don't see any environmental economic measure.

Visitor Experience Outcomes

Priority 1 and 2 Core Paths and Mountain paths

KCC support the reinstatement of roadside pavements linking communities.

More definition and cost benefit demonstration is required. Demonstration of demand is required.

Providing 22 mountain paths will certainly have a contradiction/negative impact to LLTNP's conservation objectives. 22 Scarred mountains, CO2 impact, damage to flora and fauna, road and car parks etc.

Private land owners will be a delivery partner.

Cairngorms Access trust would seem to be out-with its area.

Sustrans objectives do not align with mountain paths.

Priority 3 Callander Landscape

No comment.

Priority 4 , 5 and 6

West Highland Way (WHW)– we feel that more pressure on the WHW will contradict the LLTNP own aims of environmental conservation.

More evidence of demand for long distance routes and economic benefit against environmental impact cost is required.

Private land owners, residents and other land users should be consulted.

Priority 7

Water quality is a SEPA responsibility by regulation. SEPA may be required to enforce if and when required to maintain natural habitats and water quality.

Priority 8

We support the private sector in delivering this objective with facilitation from Visit Scotland specifically. We do not support LLTNP becoming a tourism agency.

Priority 9 and 10

We support private sector operators taking the lead.

Priority 11,12 and 13

We support private sector operators taking the lead with facilitation by Visit Scotland.

LLTNP is not a communications business, this is out with its responsibility under the Act.

Basic broadband is required before considering super fast broad band in many areas.

Scottish Government should provide leadership for national communications, possibly by reducing the number of operators.

Priority 14, to 18

KCC consider these activities are core business for LLTNP.

We support Root Cause solutions to litter, not volunteer tidy ups. There does not appear to be any enforcement supporting current resources – this could be the start.

We support more impact studies before LLTNP projects are undertaken to avoid consequential impacts.

Priority 19and 20

KCC support objectives for health improvement that are achievable and can be measured in stages to confirm results before proceeding to the next stage but this seems out with LLTNP responsibilities under the Act.

Accessing the National Park should be done with land owners agreement.

KCC will not support expenditure on Gaelic Language Plan without a cost benefit analysis.

Rural Development Objectives

We agree that much of these objectives have been set out in previous Plans which remain valid.

Priority 1 to 5

Many points are key LLTNP objectives under the Act and must be maintained.

Active travel, Climate change, water quality have all be covered by previous sections.

Priority 6 to 10

We support aims and objectives but many of these are subject to delivery by Scottish and UK National government and cannot be efficiently and democratically delivered on a regional scale. They are also out with LLTNP's role under the Act.

We question what is the achievable impact LLTNP can have on the National agenda and the appropriateness to be a delivery partner at all.

The track record shows that Energy Efficiency and Renewable energy projects are subject to national tariff policy and private sector appetite for investment.

Priority 11 to 15

These activities are currently under the lead of National providers such as Scottish Enterprise and Local Development agencies.

Each community should determine the affordable housing policy in its own area. The current policy has not been too successful as far as we know.

KCC do not consider LLTNP to be resourced or empowered under the Act to replace development agencies.

Priority 16 to 18

We support good governance including acting for and reporting to the democratic electorate -our elected member of the LLTNP represents us.

We do not support any creation of un-accountable public funded bodies.

We support communities having say in matters such as affordable housing, enhancements and opportunities.

We support owning and managing assets where fully detailed and resourced for life plans are available and independently approved and a meaningful share of funds are provided from private sources.

Priority 19

No comment

Measures: we suggest these should be more reflective of economic and social results, long term success and cost savings.

End