



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493942
(messages only)
hebe@mcofs.org.uk
www.mcofs.org.uk

26/9/11

nationalparkplan@lochlomond-trossachs.org

Dear Sir / Madam

Please accept this response to the Loch Lomond & Trossachs National Park Plan 2012-2017.

Q1 Do you agree with what success looks like for this National Park?

As the representative organisation for mountaineers (hill walkers, climbers and ski tourers) in Scotland our interests are with those constituents. This group forms a significant proportion of visitors to the National Park, and represent activities many residents enjoy also. For this reason it is important that the quality of the experiences of this community is maintained within the measure of success. Indeed as a “national” park its success must be measured as a park for the nation, in partnership with the local community and businesses. The current measures of success as stated do not make this explicit and we believe it is important that the perspective of a park-for-the-nation is retained and made clear.

Q2 Do you agree generally with the National Park’s principles?

We agree with these principles in general.

Conservation

Q3 Do you agree that these are the major challenges facing the National Park in Conservation?

The Plan states that long-term planning priorities may be threatened by resource diversion to address emerging conservation issues. The same principle could be applied to issues such as the new drive for onshore wind renewables developments. Perceived climate change panaceas should not be permitted to compromise the Sandford Principle. This reflects an additional major challenge facing the Park which is landscape conservation. The primary challenge currently is to apply policies of wildness conservation as expressed in National Planning Framework 2 (section 99) and the Scottish Planning Policy (section 128). This is a particular challenge due to the lack of a relevant designation, despite parts of the Park have high wildness value.

Q4 Do you agree with the overarching Conservation outcome?

Yes we agree with this overarching conservation outcome.

Q5 Do you have any comments on, or changes to, the conservation policy statements and are there other policies that need to be articulated on conservation within the Park Plan?

Con Policy 1: Sandford Principle

The Plan states that where the aims are in conflict, then the first will be given greater weight, however it also states that, “any development will only proceed if it does not adversely affect the integrity of a designated site.” This is not the intention of the Sandford Principle. The principle is not restricted to application to designated sites within the Park, but the Park as a whole. This would therefore encompass wildness. A re-phrasing of the final sentence is required. It is the Park as a whole that should have the Sandford Principle applied, not just parts of it.

Con Policy 3: Landscapes

We greatly welcome the explicit recognition of the vitality of protecting wildness. Opportunities should be sought to enhance this characteristic. There would be considerable benefit in expanding the explanation of this policy, and consideration should be made of the considerable impacts on core areas of wildness by developments outside the Park through visibility from the Park.

Q6 Do you have any specific comments on the priorities for action or targets?

Priority C5 Land of Wild Land Character

The Plan states that, “wild areas must be protected from extensive man-made infrastructure.” This would be wholly insufficient to deliver wildness protection. Modern man-made infrastructure does not need to be “extensive” in order to considerably impact upon wildness. The word “extensive” needs to be removed to achieve the aims of the Conservation Policy 3. We welcome the target of preparing supplementary planning guidance on relative wildness and ensuring policy development for the next Local Plan. What is also required is to bring forward the target date to, “maintain the existing area of core wild land in the National Park as per 2011 relative wildness baseline,” from 2015 to start from the introduction of the Park Plan. In the event this is not done, the intervening 3 years could see considerable impact, and rarely if ever is wildness character regained e.g. hill tracks removed. The wildness of the core areas is vulnerable to many types and locations of development in the mapped buffer zone, not just in the core areas themselves. For this reason the Park Plan needs to express the fact that buffer zone developments can significantly impact upon the core areas, and that wildness is a strong consideration in this zone. The maintenance of the core areas needs to start now.

Visitor Experience

Q9 Do you agree that these are the major challenges facing the National Park in Visitor Experience?

High levels of recreation and visitor levels can exert pressure on the Park’s natural assets, however the visitor experience can be immensely affected by pressures other than these. The greatest often is development pressure. This needs to be made explicit in the other chapters of the Plan.

Q10 Do you agree with the overarching Visitor Experience outcome?

Yes, we agree with these outcomes.

Q11 Do you have any comments on or changes to the Visitor Experience policy statement and are there other policies that need to be articulated on visitor experience in the National Park Plan?

VE Policy 1

The MCofS welcomes the differing emphasis on character management in the wilder areas. There needs to be an explanation of how the areas that are in the different management zones other than the higher and lower pressure zones (the majority of the park) are to be treated. Some of the undesignated area is popular, such as the Munro summit routes where there needs to be consideration of how to address visitor pressure. Any access infrastructure in these wilder contexts needs to take account of the wildness character even outside designated sites, and is only appropriate to address existing impact rather than create use where it does not currently exist.

Q12 Do you have any specific comments on the priorities for action or targets?

Priority VE 2

Any review of the camping byelaws must also take into consideration resultant effects outside the Park boundary.

Priority VE 4

The MCofS welcomes the commitment to monitor and patrol the lower pressure zones, particularly to monitor camping byelaw displacement effects.

Priority VE 5

Traffic management measures affecting popular mountain routes should include MCofS (community of interest) in consultations, in addition to local communities (geographical community).

Priority VE 8

This priority states that tourism facilities should be, “compatible with conservation objectives for designated sites.” Compatibility must be ensured with all the special qualities of the Park, not just designated sites, including landscape character, particularly wildness which is a non-designated quality.

Priority VE12

The MCofS welcomes the commitment to develop a plan for upland path management. It is vital that this takes into consideration the appropriateness of design dependent on the wildness of the landscape. We would also like to add to Map 5 minor but strategic infrastructure works. An example of this is the bridge on the route from Callander north of Braeleny at grid reference NN642130.

Q13 Is your organisation willing to sign up to the delivery of the priorities for action and, if so, what does your organisation intend to contribute?

The MCofS would hope to be involved in the evolution of the plan for upland path management.

Rural Development

Q15 Do you agree that these are the major challenges facing the National Park in Rural Development?

We agree that it is vital to ensure that development in the countryside does not detract from the landscape in which it is set, this is encompassed in the Sandford Principle (although see the answer to question 5). We particularly believe that during the National Park Plan period, challenge d) will

be prominent. Onshore wind renewable energy is not a panacea that justifies overriding the Sandford Principle, particularly as applied to wild landscape character. Developments outside the Park can also have a significant impact on this characteristic inside the Park, and this challenge must also be addressed by the Park Plan.

Q16 Do you agree with the overarching Rural Development outcome?

We agree with the overarching outcome with the proviso stated under question 15.

Q17 Do you have any comments on, or changes to, the Rural Development policy statements and are there other policies that need to be articulated on Rural Development in the National Park Plan?

RD Policy 5: Renewable Energy

We welcome the statement that, “largescale commercial wind turbines are incompatible with the special qualities of the National Park and are not considered to be appropriate within the National Park or where they affect its landscape setting.”

Q18 Do you have any specific comments on the proprieties for action or targets?

RD9 Increase Renewable Energy Generation

As stated, “cumulative impacts of smallscale hydro on the landscapes, hydrology and ecology of the Park need to be better understood.” This understanding should be gained in advance of further significant proliferation of schemes, or there is a risk that cumulative impacts of the developments will have already exceeded the threshold of capacity when such an understanding is reached. Gaining this understanding is a matter of urgency, and a target should not be set to positively encourage this form of development until this understanding is reached. This is a greater priority than an increase in renewable generation as capacity for the landscape to absorb these developments is currently undefined, and is a strategic necessity.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer