# Strategic Environmental Assessment (SEA) of the Loch Lomond and the Trossachs National Park Partnership Plan 2018-2023

## Non-Technical Summary

December 2017

# Introduction

The Loch Lomond and the Trossachs National Park Authority (the NPA) have developed a National Park Partnership Plan (NPPP) for the period 2018-2023. This plan will replace the current NPPP which was adopted in 2012 and will expire at the end of 2017.

As part of the process of developing the new plan, the NPA have been undertaking a Strategic Environmental Assessment (SEA) of the emerging draft. The NPA commissioned Collingwood Environmental Planning Limited (CEP) to undertake the environmental assessment of the draft plan. Subsequent stages of the SEA have been undertaken "in-house" by the NPA.

SEA is a legal requirement for certain plans and programmes in line with the European Commission (EC) SEA Directive (2001/42/EC) and the Environmental Assessment (Scotland) Act 2005 (the 2005 Act). **The purpose of SEA is to ensure that the likely significant effects on the environment of implementing the new NPPP (and of reasonable alternatives) are identified, described, evaluated and taken into account before the plan is adopted**.

This document is the **Non-Technical Summary** (NTS) of the Environmental Report required under the 2005 Act. Both documents and the draft NPPP 2018-2023 can be downloaded from the internet at:

**http://www.lochlomond-trossachs.org/park-authority/**

# The National Park Partnership Plan (NPPP) 2018-2023

The draft NPPP 2018-2023 sets out proposals for how the NPA and a wide range of other organisations and interests can work together over the next five years to look after, enhance and make the most of the special landscape of the Loch Lomond and the Trossachs National Park (LLTNP). The coordination purpose of the plan helps to align the resources and activities of partners, ensuring value for money and the achievement of desired outcomes for the Park. Full details of the proposals can be found in the draft plan document itself, available via the link above.

***Box A: Draft NPPP 2018-2023 – themes and vision statements***

1. **Conservation and Land Use:** nature, heritage, land and water are valued, managed and enhanced for multiple benefits for for all;
2. **Visitor Experience:** there is a high quality, authentic visitor experience for visitors from all backgrounds to enjoy recreation activities and appreciate the area's outstanding natural and cultural heritage; and
3. **Rural Development:** businesses and communities thrive and people live and work sustainably in a high quality environment.

The NPPP is made up of three different themed chapters. Each theme has a vision which describes the overall outcome that the NPA aims to achieve for that aspect of the Park and its management (see ***Box A***). Underpinning the visions, there are several priorities that set out (in a broad sense) the NPA's work plan for the period 2018-2023. These priorities have been assessed in this SEA to identify the likely significant effect on the environment of implementing the NPPP.

For those requiring further information, a more detailed overview of the draft NPPP 2018-2023 can be found in ***Chapter 2*** of the NPPP SEA Environmental Report.

# Environmental information and objectives for the SEA

Following a review of other relevant plans, programmes and strategies and associated environmental objectives, and taking into account the nature and scope of the proposed NPPP (see ***Box A***), broad aspirational environmental (SEA) objectives were identified (see ***Table A***). These "SEA objectives" provide the basis for assessing the potentially significant environmental effects of the NPPP. Instances where the NPPP shows support for SEA objectives may result in **positive** environmental effects. Areas of conflict between NPPP provisions and SEA objectives may result in **negative** effects.

**Table A: SEA objectives used in the assessment of the draft NPPP 2018-2023**

| SEA topic | SEA objective(s) |
|---|---|
| ***Biodiversity, flora & fauna*** | 1. Furthering biodiversity by conserving and enhancing the diversity of species |
| | 2. Further biodiversity by conserving and enhancing the diversity of habitats |
| | 3. Conserve and enhance the integrity of ecosystems |
| ***Geology & soils*** | 4. Conserve and enhance land form, soils and related natural processes and systems |
| ***Water*** | 5. Conserve and enhance the water environment including coastal, river and loch systems |
| ***Air & noise*** | 6. Maintain and improve air quality |
| | 7. Reduce noise and light pollution |
| ***Climatic factors*** | 8. Reduce the causes of climate change (mitigation) |
| | 9. Reduce the effects of climate change (adaptation) |
| ***Landscape & cultural heritage*** | 10. Conserve and enhance the landscape character, local distinctiveness, and scenic value of the Park |
| | 11. Protect and (where appropriate) enhance the Park's cultural, historic and built environments |
| ***Population & human health*** | 12. Protect and improve the health and wellbeing of residents and visitors to the Park |
| ***Material assets*** | 13. Promote sustainable use of resources |

A review of the existing state (baseline) and trends of the environment was undertaken alongside the process of developing the SEA objectives. This review identified indicators and data that can be used to measure progress towards the SEA objectives. The analysis of environmental trends helps to identify potential future environmental problems and issues; e.g. where there is a decline in the condition of an aspect of the environment at odds with policy objectives or targets.

Overall, the status and trends of the Park's natural environment indicates a mixed picture. In terms of ***biodiversity*** for example, grazing impacts from deer, sheep and feral goats continue to suppress many habitats (e.g. native woodland) though some important wild species populations are increasing (e.g. pine marten). For the Park's ***landscapes and cultural heritage***, there is increasing recognition of the value of the Park's wilder areas and of the importance of cultural heritage across the Park (e.g. traditional buildings and building methods / materials) contrasted with a decline in traditional land management in some areas. In terms of ***population and human health***, the Park has a declining and ageing population, a trend that mirrors many other parts of rural Scotland.

The trends identified in the review of environmental information show how the environment might change if the new NPPP was not put in place. The SEA and environmental monitoring undertaken for the current NPPP (2012-2017) also helps to illustrate this. Part of the purpose of reviewing the NPPP on a five-yearly basis is to take stock of progress, review environmental trends and, where appropriate, identify a new course action for the NPPP to address emerging environmental issues.

For those requiring further information, a detailed review of the environmental baseline, trends and key environmental issues can be found in ***Chapter 4*** of the NPPP SEA Environmental Report and ***Appendix 3*** in the standalone appendices volume.

# Assessment of NPPP outcomes and alternatives

As part of the assessment of the NPPP, the compatibility of the NPPP's proposed outcomes with SEA objectives (see ***Table A***) was tested. The assessment showed how NPPP outcomes are to a large extent compatible with environmental objectives. In particular, 10 of the 13 NPPP outcomes show strong support for ***population and human health*** SEA objectives, due to the Park's focus on outdoor recreation and exercise and new NPPP outcomes concerning **health and outreach**.

However, a small number of outcomes may conflict with SEA objectives, depending on how the plan is implemented. For example, the assessment identified mixed compatibility with ***biodiversity*** SEA objectives; whilst all **Conservation and Land Use** theme outcomes show strong support, key outcomes from the **Visitor Experience** and **Rural Development** themes may result in increased visits to and use of the Park which could disrupt habitats and wild species (e.g. in sensitive loch side locations).

For those requiring further information, a detailed write-up of the NPPP outcomes vs. SEA objectives compatibility analysis can be found in ***Chapter 6*** of the NPPP SEA Environmental Report and ***Appendix 4*** in the standalone appendices volume.

An important function of SEA is to help identify other 'reasonable alternatives' to the preferred plan that might be better in environmental terms (i.e. likely to result in less negative and more positive environmental effects). Alternatives must be 'reasonable' in relation to the objectives and geographical scope of the plan being assessed.

In the case of the NPPP, other reasonable alternatives to the preferred plan are not readily available given the overall objectives for the plan and functions of the NPA, as established by the National Parks (Scotland) Act 2000. In particular, the UK National Parks **Sandford Principle** means that:

> *"If there is a conflict between protecting the environment [of the Park] and people enjoying the environment, that can't be resolved by management, then protecting the environment is more important"*[1]

In effect, the Sandford Principle means that the options for the NPPP are tightly bounded by the need to protect the Park's natural and cultural heritage above all other objectives. So, for example,

having a more economically focussed alternative would not be considered 'reasonable'.

[1] http://www.nationalparks.gov.uk/students/whatisanationalpark/aimsandpurposesofnationalparks/sandfordprinciple

As such, the NPA did not identify any alternatives other than the preferred NPPP 2018-2023. To provide a comparison, however, the SEA considered the environmental implications of the new plan vs. the old plan; what could be considered a "Business as Usual" scenario. This was carried out using an environmental SWOT (strengths, weaknesses, opportunities and threats) analysis approach.

Overall, the environmental SWOT analysis highlighted how the new plan (NPPP 2018-2023) has several important strengths and opportunities over the old plan (NPPP 2012-2017). On balance, the new plan appears to be preferable in environmental terms. Particular strengths relate to the new plan's support for a catchment based approach to delivering many measures. This is preferable as planning and delivery of land use management at the ecosystem scale can be more effective, especially for ***water***, ***climatic factors*** and ***biodiversity*** related issues. Important opportunities within the new plan include support for a new regional level collaborative land use planning mechanism which, when linked to existing NPPP support for farm / estate / holding level planning, raises the possibility of improved environmental outcomes across most ***SEA objectives***.

Notwithstanding the above, a key weakness of the new plan over the old plan is its lack of specific implementation detail. Given limited public sector resources and the way in which the draft priorities are framed in the plan, it is unclear how intervention under the NPPP will be prioritised, and therefore whether resources may end up being spread too thinly. It is anticipated that this uncertainty will be resolved through lower level planning and policy (e.g. individual partner agreements). An example of an environmental threat raised by the new plan includes the increased focus on water based recreation on large lochs in the Park (e.g. Loch Lomond, Loch Long). This will require careful management to ensure that ***biodiversity*** and ***landscape*** issues are not negatively affected.

For those requiring further information, a detailed write-up of the alternatives assessment can be found in ***Chapter 7*** of the NPPP SEA Environmental Report.

# Key environmental effects of the NPPP

Draft priorities from each of the NPPP's three themed chapters were assessed against the SEA objectives (see ***Table A***). Overall, the proposed NPPP is likely to result in a range of primarily positive and neutral environmental effects (see ***Table B***). This reflects the strong environmental focus of the NPPP (and the wider role of the NPA) as enshrined in the National Parks (Scotland) Act 2000 and via mechanisms like the Sandford Principle. Priorities within the **Conservation and Land Use** theme (see ***Box A***) are likely to be particularly beneficial, especially in relation to ***biodiversity***, ***soil***, ***water***, ***climatic factors*** and ***landscape*** related issues.

There are, however, some minor areas of potential environmental risk associated with the draft NPPP. Principally, this relates to priorities within the plan's **Visitor Experience** and **Rural Development** themes (see ***Box A***). Aspects of the environment that could be subject to minor negative effects include ***biodiversity***, ***soil***, ***noise*** and ***climatic factors***. This reflects the inherent tension between the NPA's principal role protecting and enhancing the Park's natural and cultural heritage vs. the need to promote recreation, tourism, rural development etc, to ensure that the Park also functions effectively for the people who live and work there (e.g. in terms of promoting a diverse and resilient rural economy, ensuring adequate housing provision to meet various needs). However, these environmental risks are considered to be minor only in terms of significance and can largely be mitigated upon implementation or with recourse to the Sandford Principle, where necessary.

For those requiring further information, a detailed write-up of the assessment of the proposed NPPP 2018-2023 can be found in ***Chapter 8*** of the NPPP SEA Environmental Report and ***Appendix 5*** in the standalone

appendices volume.

# Proposed mitigation and enhancement measures

The assessment of the draft NPPP 2018-2023 suggests that no **major** negative environmental effects are likely to arise. Where the potential for minor negative effects has been identified, these are typically in relation to the sensitive nature of the environment, but where with careful design and management, such activity or development could take place sustainably and the effects mitigated.

### Table B: Assessment of NPPP 2018-2023 draft priorities – overall summary matrix

**Note:** the assessment summary below aggregates the results of individual assessments for all priorities within a given theme (this means that all assessments are 'mixed'). Colour coding is used to show the **dominant effect**.

| | | NPPP themes | | |
|---|---|---|---|---|
| **Key to potential environmental effects** | | **Conservation & Land Use** | **Visitor Experience** | **Rural Development** |
| ++ | Major positive | | | |
| + | Minor positive | | | |
| 0 | Neutral | | | |
| - | Minor negative | | | |
| -- | Major negative | | | |
| -/+ | Mixed | | | |
| ? | Uncertain | | | |
| **SEA Objectives** | | | | |
| Furthering biodiversity by conserving and enhancing the diversity of species | | ++ - ? | - + 0 ? | 0 + - ? |
| Further biodiversity by conserving and enhancing the diversity of habitats | | ++ - ? | - + 0 ? | 0 + - ? |
| Conserve and enhance the integrity of ecosystems | | ++ - ? | 0 - + | 0 + - ? |
| Conserve and enhance land form, soils and related natural processes and systems | | ++ 0 ? | 0 - + | 0 + - ? |
| Conserve and enhance the water environment including coastal, river and loch systems | | ++ 0 ? | 0 - + ? | 0 + ? |
| Maintain and improve air quality | | 0 - ? | + 0 ? | 0 + ? |
| Reduce noise and light pollution | | + 0 ? | + - 0 ? | 0 - ? |
| Reduce the causes of climate change (mitigation) | | ++ ? | + 0 - ? | + - 0 ? |
| Reduce the effects of climate change (adaptation) | | ++ | 0 | 0 + ? |
| Conserve and enhance the landscape character, local distinctiveness, and scenic value of the Park | | ++ - ? | 0 + - ? | 0 + - ? |
| Protect and (where appropriate) enhance the Park's cultural, historic and built environments | | + - 0 ? | 0 ? | 0 + ? |
| Protect and improve the health and wellbeing of residents and visitors to the Park | | + ? | + | + 0 |
| Promote sustainable use of resources | | + 0 ? | + 0 ? | 0 + ? |

In many cases, the delivery of measures to mitigate negative effects will need to be undertaken by the lower level plans and programmes that implement the NPPP and in relation to individual projects. Individual partnership agreements for NPPP partners, where they are to be used, could also provide a useful mechanism to articulate mitigation for specific partners and their activities. To

address these lower level implementation issues, a range of more detailed operational and management measures have been developed as outlined in the Environmental Report.

For those requiring further information, the full list of proposed operational and management measures can be found in ***Chapter 8 Table 8.5*** of the NPPP SEA Environmental Report.

Mitigation has also been proposed in terms of suggested amendments to the wording of draft NPPP priorities. This mitigation strategy for SEA suggests possible changes to the aspect of the plan likely to cause the negative effect(s). In doing so, the strategic intent of the NPPP is altered thereby helping to ensure that desired environmental outcomes are achieved.

# Monitoring proposals

Monitoring the significant environmental effects of implementing the NPPP is an important and ongoing element of the SEA process. Given the inherent uncertainty concerning the NPPP's likely significant effect on the environment (due to the high-level nature of the plan), monitoring the implementation of the NPPP from an environmental perspective will ensure that actual progress against the environmental objectives, which formed the core of this assessment, can be measured. Where unexpected negative effects are identified, appropriate remedial actions can be identified and implemented.

The recommended measures needed to monitor the potentially significant and cumulative negative environmental effects of the NPPP are outlined in ***Table D*** below. At this stage, monitoring arrangements have not been fully developed and it will therefore be important to define the monitoring process and timeframe in more detail and also to establish clear responsibilities for monitoring. This will be included as part of the post adoption stages of SEA.

**Table D: Proposed monitoring of key significant effects identified in the assessment**

| SEA topic | Proposed indicator categories |
|---|---|
| ***Biodiversity, flora & fauna*** | • Extent and condition of UK BAP habitats and species (including key upland bog / peatland and woodland habitats).<br>• Extent and condition of designated sites (Figure 4.2).<br>• Location and extent of natural / semi-natural habitats.<br>• Biodiversity index: species indicators – e.g. farmland / woodland bird species.<br>• Visitor numbers to the Park or suitable proxies (e.g. number of overnight stays).<br>• Area of park under agri-environment-climate (AEC) schemes.<br>• YOURPark byelaw implementation reporting (e.g. fines, visual inspections). |
| ***Geology & soils*** | • Proxies for soil carbon content: extent of soils rich in organic matter; extent of peatlands; soil record books.<br>• Water quality / sediment content (as a proxy for soil erosion).<br>• Areas of highly erodible soils.<br>• Fertiliser application rates to arable and grazing land in the Park.<br>• Visitor numbers to the Park or suitable proxies (e.g. number of overnight stays).<br>• Area of park under agri-environment-climate (AEC) schemes.<br>• Implementation of path upgrade and maintenance programmes.<br>• TMTP path volunteer reporting. |
| ***Water*** | • Overall quality (WFD status) of river and loch waterbodies in the Park.<br>• Likely % compliance of waterbodies across the Park with WFD objectives.<br>• Distribution of nitrate and sediment concentrations in waterbodies across the Park.<br>• Area of park under agri-environment-climate (AEC) schemes.<br>• YOURPark byelaw implementation reporting (e.g. fines, visual inspections). |

| SEA topic | Proposed indicator categories |
|---|---|
| | • Flooding related indicators as per *climatic factors*. |
| ***Air & noise*** | • Modal choice / split for visits to the Park.<br>• Percentage of Park residents with access to public transport.<br>• Levels of car and van ownership amongst Park residents.<br>• Local authority air quality reporting.<br>• Visitor numbers to the Park or suitable proxies (e.g. number of overnight stays). |
| ***Climatic factors*** | • Transport related indicators as per *air & noise*.<br>• Flood hazard extent / depth (especially fluvial flooding).<br>• Flooding impacts.<br>• Area of park under agri-environment-climate (AEC) schemes.<br>• Carbon equivalent ($CO_2e$) emissions by sector.<br>• Total greenhouse gas emissions ($CO_2e$) from the Park.<br>• Socio-economic impacts of climate risks (e.g. levels of service disruption).<br>• New development (e.g. number of houses delivered).<br>• New development adopting sustainable design (e.g. timber construction, micro-renewables) |
| ***Landscape & cultural heritage*** | • Landscape Character Areas.<br>• Extent and condition / integrity of core areas of wild land in the Park.<br>• Extent and condition of historic and designed landscapes in the Park.<br>• Area of park under agri-environment-climate (AEC) schemes. |
| ***Population & human health*** | • Delivery of new / upgraded access and outdoor recreation infrastructure (e.g. length of upgraded path).<br>• Visitor numbers to the Park or suitable proxies (e.g. number of overnight stays).<br>• Participation rates in outdoor sporting events held in the Park (e.g. Great Scottish Swim).<br>• Participation rates in different outdoor recreation activities in the Park or suitable proxies (e.g. usage of core path network).<br>• Health outcomes in affected communities. |

# Conclusions and next steps

The environmental assessment of the draft NPPP 2018-2023 summarised in this NTS has identified a range of primarily positive and neutral effects with some limited potential for minor negative effects to arise. On balance, therefore, the NPPP is likely to result in a positive effect on the environment overall. This is to be expected given the predominantly environmental remit of the NPA, the NPPP and the National Park itself.

Following the consultation on the draft NPPP 2018-2023 and its accompanying draft Environmental Report, comments were fed back into the revisions of the NPPP. Minor changes were made to the NPPP with some priorities being merged and editorial edits made to the NPPP with the assessment updated to reflect these minor changes.

Once the NPPP has been approved by the Scottish Ministers and adopted by the NPA, an SEA post-adoption statement will be produced to indicate how the SEA has influenced the final NPPP.

Hard copies are available for inspection at the following address:

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