

3 July 2017

NPP Public Consultation  
Loch Lomond & The Trossachs National Park  
Carrochan  
Balloch G83 8EG  
Sent by post and to [info@lochlomond-trossachs.org](mailto:info@lochlomond-trossachs.org)

Dear Sir or Madam

### National Park Partnership Plan consultation response

Ramblers Scotland welcomes the opportunity to comment on the National Park Partnership Plan (NPPP). Ramblers Scotland helps everyone, across Scotland, enjoy walking and protects the places we love to walk. We are the representative body for walkers in Scotland and are recognised by **sportscotland** as a governing body of sport. We are a membership organisation with 54 local walking groups in Scotland, running 3,500 group walks a year which are led and organised by volunteers.

We are supportive of national parks and will be pleased to work with the park authority where we have shared aims to deliver on the objectives of the partnership plan.

#### General comments

We are in agreement with the overarching vision for the NPPP but we have the following general points to make.

**Lack of supporting evidence:** while overall the vision, outcomes and priorities for all sections seem on the face of it to be reasonable and appropriate, there is a lack of evidence in the document to give the context for why the national park authority has chosen these particular outcomes and priorities and therefore why the park's budget will be set accordingly to deliver them. We acknowledge that the SEA and a Habitats Regulations Appraisal are provided as background but this information is not easily extracted, and in the consultation document there are no links to existing park strategy documents or indeed a report on the extent of progress achieved in the current park plan to explain the current priorities. As far as we are aware, the last published update on progress was for 2014.

In particular, from our perspective there is a lack of information related to those priorities set out within the Visitor Experience section. For example, we are not given statistics on a breakdown of what type of visitors come to the park and during which months, what proportion of visitors do particular activities, their expectations, the modes of transport they use, how far they travel from home, etc. We assume the park has much of this evidence and it would be very helpful for us if it were provided in an easily-available format, as was provided by the Cairngorms NPA in their own partnership plan consultation, to help assess this current document and better understand the basis for directing the investment and operational priorities which will flow from this plan. From discussion with park staff, we are aware that a review of the Outdoor Recreation Plan is going to be undertaken shortly, but this plan is not referred to at all in the document, nor the forthcoming review.

**Lack of recreation body involvement:** it is striking that there is no recreation user representative body listed as a partner within this partnership plan, despite the fact that the promotion of outdoor recreation is one of the four main aims of national parks in Scotland and on p9 of the document there is a commitment to use the opportunity of the NPP to “strengthen partnership working”.

The vast majority of those people who visit the park come to enjoy walking, mountaineering, watersports, angling, cycling, horse riding or other outdoor activities, and it is therefore disappointing that no recreation body is felt to merit partnership status to represent the interests of this constituency. This includes umbrella organisations like the Scottish Sports Association (SSA) which represents governing bodies of sport. By contrast landowning and community interests are well represented as partners, but even where NGOs are included they are usually there in their role as landowning charities, such as RSPB Scotland, National Trust for Scotland, or Woodland Trust, or for their role in volunteer support activity, such as the John Muir Award.

Clearly much work has gone into building capacity and engaging with local communities, but from our perspective the wider community of interest has had little engagement with park authority staff and therefore is not included within this plan. Instead recreation bodies like ourselves are relegated to being treated as a stakeholder in the park. One example of this is that we are invited, along with other sectors, to the stakeholder forum related to the implementation of the camping management plan. These events are occasions for the park staff to provide a welcome update on the park’s activities rather than being opportunities for true engagement in developing the park’s plans.

Ramblers Scotland has raised the issue of lack of engagement with recreation bodies by the park authority over many years. We accept that the park authority staff are experienced and knowledgeable with regard to outdoor recreation management, but their remit is that of a public body involved in visitor management, rather than coming from the perspective of the users of the park. Therefore it is crucial that this sector is more fully engaged. We urge the park authority to set up mechanisms for regular engagement with key representative organisations like ourselves and also through SSA and with Scottish Environment LINK whose members include smaller membership organisations often with highly knowledgeable members who are particularly interested in the conservation management objectives of the national park but who are not landowning NGOs themselves and can speak from the perspective of many visitors to the park.

### ***Specific questions on which we have comments to make***

#### **Conservation**

##### **Conservation Outcome 1**

We support this outcome but as noted above the lack of evidence to set the wider context means it is difficult to comment more specifically on the priorities. To give one example, while we support the intention to create “more extensive and better connected forest and woodland networks”, there is no detail of the kind of woodland expansion that is proposed. At one end of the spectrum, much of the national park is currently covered with dense, historic sitka spruce plantations which, among other things, can set an impenetrable barrier along great swathes of the park for people to access the hills beyond them. More information about plans to fell or thin and replant these forests in a more sensitive way, or to provide better routes through the forestry, would be helpful. On the other hand, while we fully support expansion of native species woodland, our preference is for this to happen through natural regeneration and by reducing the number of deer, rather than solely by use of deer fencing to keep out grazing animals. Fencing can cause difficulties for those

enjoying outdoor access if there are not sufficient crossing points, as well as having a landscape impact.

We accept that the national park authority can only *encourage* private landowners to carry out more sustainable land management practices. Working in partnership in areas which are owned by public bodies or NGOs is helpful in providing examples of good practice to demonstrate the benefits of this land use to others, but the park also needs to be clearer in setting out the context for its vision on for sustainable land use, so that landowners are more aware of the evidence for the outcomes sought.

### **Conservation Outcome 2**

We agree with this outcome as it stands but feel that a number of issues are missing from the supporting text. Also, as noted above it is disappointing that no recreation bodies are included as delivery partners in this area of work, especially as there are priority work areas (eg, Conservation Priority 6) which are aiming to change visitor behavior and would benefit from input from such representative organisations.

Firstly, in relation to Conservation Priority 3, we have no detail on how the park will carry out this work. As members of the Scottish Environment LINK Hilltracks sub-group we have been monitoring the growth of tracks in upland areas across Scotland which are one type of development which can impact on the wild qualities of the landscape as well as potentially causing environmental damage. With regard to the building of new hill tracks for forestry or agricultural purposes, prior notification is now required by land managers but not full planning permission unless the tracks fall within the proportion of the park which is also a National Scenic Area. We would be pleased if the park could send a strong signal that new tracks should not normally be constructed within the park on open moorland, as is the case within the Cairngorms NP Partnership Plan, which would help to give a greater measure of protection of the special landscape qualities of the park.

In relation to current track construction, those which are causing the most concern to the LINK group are those relating to some hydro schemes. While we are not opposed to small scale hydro projects *per se*, the lack of effective monitoring and enforcement of planning conditions on some schemes within the national park have been highlighted to us, including a poor standard of mitigation measures. We therefore would like a stronger commitment to ensure that schemes are monitored throughout the construction phase and that the park's own planning guidance is strictly enforced. We believe that the proposed measure of success to ensure that mitigation schemes are in place is not strong enough.

With regard to Conservation Priority 4, it is clearly important to retain good lines of sight from the main trunk roads within the park, but it is disappointing that this is the only measure mentioned in the text with regard to helping visitors to be inspired through the landscape. We would suggest that identifying strategic laybys or car parks and providing supporting infrastructure such as path networks, litter bins, toilets and interpretation information would be helpful in enabling people to explore the park rather than simply driving through it and looking at the views.

Finally, in terms of Conservation Priority 6, our opposition to the national park camping byelaws is known, but we fully support the education efforts of the park and are pleased to play our own role with regard to promoting responsible access to the public. However, while education is important, it is also crucial to ensure that people are able to do the right thing easily and it is our view that greater provision of infrastructure (toilets, litter bins, campsites) in heavily visited areas is also essential.

### **Conservation Outcomes 3 and 4**

There is a great deal to support within these sections, in particular the commitment to tackle overgrazing, the impact of deer levels and plans for peatland restoration. We are also pleased to see the proposal to create Regional Land Use Partnerships. However again there is very little detail on how to achieve these outcomes.

### **Visitor Experience**

The outcomes within this section seem appropriate. We have a number of comments to make with regard to the delivery of these outcomes, but as noted above we have also learnt that the park is planning a review of its outdoor recreation plan later this year and so will restrict our comments to more general points at this stage in expectation of being invited to engage in the review in due course.

#### **Visitor Experience Outcome 1**

We are aware from VisitScotland surveys that short walks are the most popular form of physical activity for visitors to Scotland and assume that this is a similar situation for those coming to the national park. Therefore we support the continued development of recreation networks as we believe that an extensive, well-promoted and well-maintained path network forms the basis for encouraging larger numbers of people to enjoy the park on foot or by bike during their visit, and thus benefiting from the physical and mental health benefits of being active outdoors.

Once again, it is disappointing that no recreation bodies are listed as partners for delivery but government and community bodies are included. As a representative body and membership organisation as well as a governing body of sport, Ramblers Scotland has a large network and can add value to the park's promotional work relating to all types of paths. We have a number of members who are working as volunteers in support of some of these projects and others who may be keen to be engaged in path survey work. We are also currently working with the park authority through a National Access Forum sub-group on a project relating to core path plans.

#### **Visitor Experience Outcome 2**

We support this outcome and continued efforts to improve the Waterbus network to enable more people to use the loch for part of their walking experiences. This is particularly important in reducing private car use within the park once people have arrived there, but information on public transport links to the waterbus or cycle carrying facilities would also enable exploration of the park for those without a car.

#### **Visitor Experience Outcome 3**

We support this outcome although would caution that the park needs to ensure that those coming to the park to enjoy free outdoor activities are not being discouraged, whether that's walking, cycling, picnicking or camping in those areas where the byelaw does not apply. We are pleased to see a recognition of the need to provide lower cost accommodation types and in particular campsites. We believe that more campsites, both formal and informal (ie, setting aside of a field at busy weekends during the summer) would help to encourage more people of diverse backgrounds to visit the park. However, overall the existing priorities suggest there needs to be more of a commitment from the park to plan for the needs of visitors rather than simply supporting and encouraging the private sector to provide facilities. We believe the park needs to consider the use of compulsory purchase powers if landowners are not demonstrating a real willingness to collaborate in finding a solution to this problem.

We fully agree with the statement that rail travel to the park is under-promoted and the priority 13 commitment to deliver improved welcomes at railway stations. However, currently the train and long distance bus schedules from Glasgow and Edinburgh do not encourage use of public transport for days out in the park with long gaps between trains. Also, the lack of bicycle carrying capacity is an issue, especially for those travelling in a group.

#### **Visitor Experience Outcome 4**

While we agree with the outcome, we would like to see more evidence relating to the current situation to help us better understand the chosen priority areas. There are clearly honeypot areas within the park but we suggest a strategy is needed to manage the visitor pressure where it occurs and also to encourage visitors to move beyond these places and spread the visitor numbers more widely. In terms of transport, there is a need to consider both how best to enable visitors to arrive by public transport and also how to encourage people to travel around the park by public transport, walking or cycling once they have arrived by car. These are two separate issues and need different strategies to deal with them. It would be useful to see evidence of the proportion of visitors using different modes of transport and the potential areas where, for example, cycle hire might work well, or indeed consideration of a shuttle bus service to Rowardennan from Balloch station or connected to a park-and-ride facility along the east side of Loch Lomond. We will comment on these issues more fully in the forthcoming review of the outdoor recreation plan.

With regard to Visitor Experience Priority 14 on the camping management plan, our position is unchanged from before the introduction of the byelaws. We recognise the need to manage visitor pressure from large numbers of people enjoying informal camping activities but we continue to believe that the camping byelaws are unnecessary, and instead investment should be directed towards the creation of new campsites, provision of other visitor facilities and ongoing educational work on what responsible access means. This should be supported by enforcement of existing legislation on littering, etc, where problems arise.

We are of the belief that the camping byelaws should be removed following three years of their implementation, when the required final report on their effect is submitted to Scottish Ministers, and that there should be no extension of the area which is currently covered by byelaws. We urge the park to ensure that there has been sufficient investment in facilities and other management measures by that time to enable park resources to be deployed in more positive ways to promote responsible visitor behavior, rather than in policing responsible campers.

We would also like to add that we fully support Visitor Experience Priority 16 and any initiatives to tackle litter, but we believe a multi-agency approach in partnership with the community and voluntary sectors is needed. This could be used as an exemplar for dealing with this issue which sadly exists across the whole of Scotland and is not entirely related to visitors, given the problems of fly-tipping and marine litter which blight the area.

We are always happy to support educational campaigns related to promoting responsible enjoyment of the park, adding value where possible to these initiatives, and would also support low cost camping initiatives.

Finally, on p21 of the consultation document there is a statement about the historical “highly seasonal, weather dependent visitor economy”. While we do not dispute that this is currently the case, we would urge the park to treat the high numbers of people visiting the park during these times as an opportunity and to consider how to manage the challenges of such ‘boom and bust’ and the subsequent prospects for businesses within the park if more people are attracted to visit the park on a year-round basis. Scotland’s natural heritage has much of interest to offer throughout the seasons, as highlighted in recent nature television

programmes featuring the park and its wildlife across four seasons, and most types of outdoor recreation likewise are year-round activities. It is therefore essential in making the shift to encourage higher levels of visitors throughout the year that a certain level of facilities, such as public toilets, remain open. In addition, low cost interventions like the construction of simple covered shelters on popular walking routes would encourage groups not to cancel walking activities on wet days if they are aware of sheltered places where they can eat their lunches. The proximity of the park to large centres of population is an advantage in encouraging people to take advantage of the attractions of the park throughout the year.

### **Visitor Experience Outcome 5**

These are very worthwhile priorities and we support this outcome but feel that the activities and measures of success lack ambition. It is important to recognise that the park can create the conditions for others to benefit from in terms of health benefits gained from enjoying physical activity in the natural environment. This includes extending the path networks within the park and ensuring that they are well-signed and well-maintained, and providing low cost accommodation and car-free travel options.

Recreation bodies and especially those which are also governing bodies of sport can play a partnership role in delivering this outcome.

### **Rural Development**

Again, these are outcomes and priorities which we support in principle. We recognise it is important to build capacity and support local residents in sustainable business growth and in taking ownership of the opportunities which exist within the park.

### **Rural Development Outcome 1**

For Rural Development Priority 1, we are aware of discussions already taken place relating to the proposed Flamingoland development at Balloch. While we await sight of the formal application we urge the park authority to ensure that this is an appropriate development in keeping with its location as the gateway to the national park and that it meets the needs of all visitors as well as the local community.

With regard to Rural Development Priority 4, the identification of key off-road routes or paths parallel to roads would enable greater take up of active travel both for visitors and residents, and help to demonstrate to the rest of Scotland how people living in rural areas can also choose the option of active modes of transport.

We hope these comments are helpful and would be very happy to meet the park authority to discuss any issues further.

Yours faithfully

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Campaigns & policy manager