

REPORT

# SUMMARY OF CONSULTATION RESPONSES

AUGUST 2017

DRAFT NATIONAL PARK PARTNERSHIP PLAN 2018- 2023



# CONTENTS

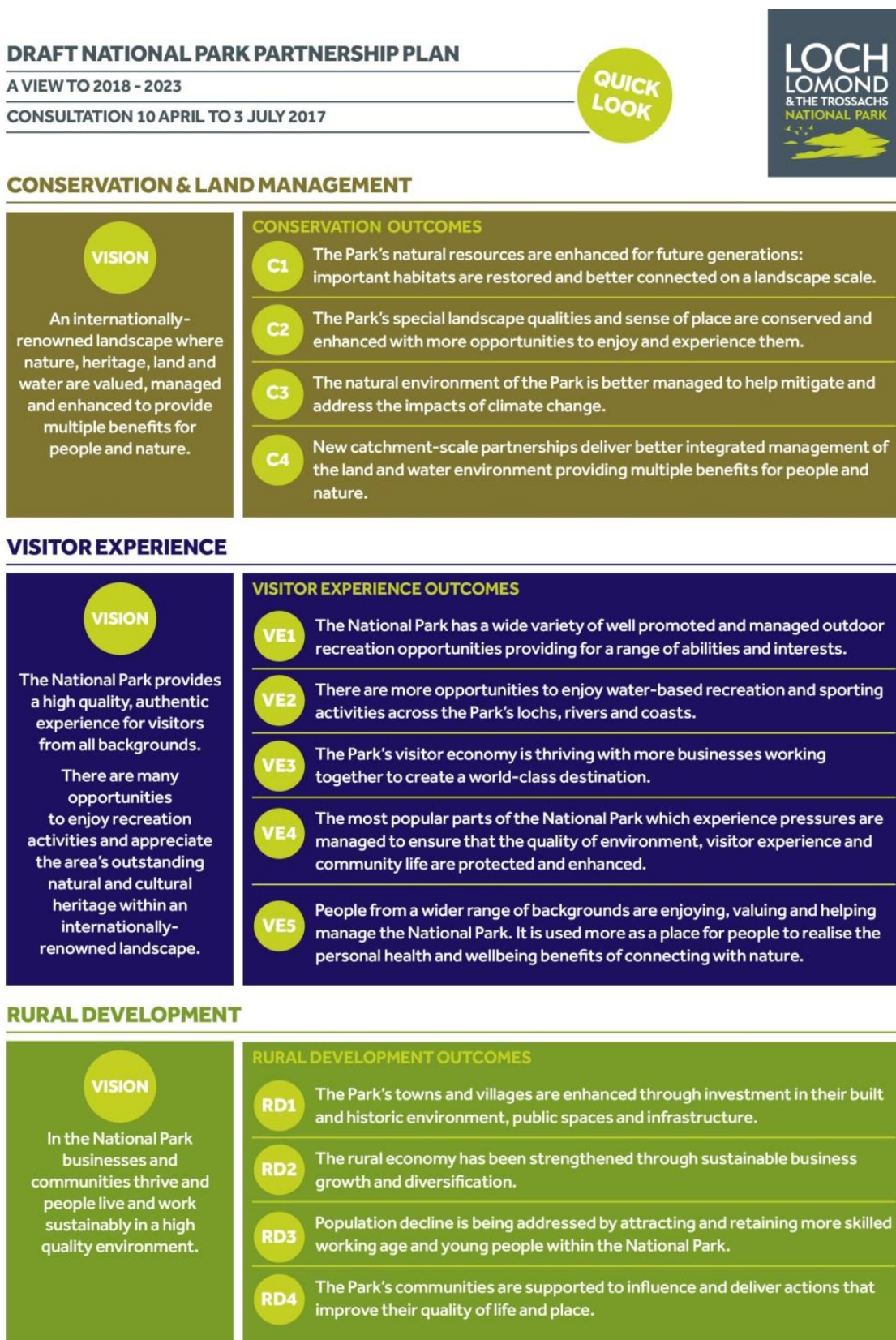
	Page
1.0 Introduction	2
2.0 Summary of comments from Draft National Park Plan Consultation	4
2.1 Respondents	4
2.2 Conservation and Land Management	4
2.3 Visitor Experience	7
2.4 Rural Development	9
3.0 Draft Environmental Report	9
4.0 Draft Habitats Regulation Appraisal	11
5.0 Next Steps	12
6.0 Appendices	13
Appendix 1: List of organisations that completed a consultation response to the draft National Park Partnership Plan	

## 1.0 INTRODUCTION

This report provides information and a broad summary of the responses received to the consultation on the Draft National Park Partnership Plan 2018-2023, Draft Environmental Report and Draft Habitats Regulations Appraisal. A separate report containing verbatim comments received can be found on our website at <http://www.lochlomond-trossachs.org/park-authority/get-involved/consultations/nppp/>

The draft Plan proposes how the National Park Authority 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 Loch Lomond & The Trossachs National Park. The draft Plan was also subject to a Strategic Environmental Assessment and a Habitats Regulations Appraisal. Figure 1 provides a summary overview of the Plan's proposed vision and outcomes for Conservation and Land Use, Visitor Experience and Rural Development.

**Figure 1 summary overview of the Plan’s proposed vision and outcomes for Conservation and Land Use, Visitor Experience and Rural Development.**



The consultation responses received to the draft Plan will be taken into consideration when preparing the final National Park Partnership Park Plan which will be submitted to the Scottish Ministers for approval in December 2017.

Consultation on the draft Plan lasted for 12 weeks and ran from 10 April to 3 July 2017. A variety of methods were used to promote the consultation, inform people about the draft Plan and encourage responses to it. These included a formal launch of the consultation at Callander Youth Project in Callander, accompanied by both mainstream and sector media press releases. Various national and local newspapers provided coverage. Social media was used to promote wider awareness of the consultation, including short videos, vlogs and blogs. Mailchimp was used to track and monitor email communications, with prompts being issued at stages throughout the consultation to prompt and remind people of the deadline for comments. Stakeholder engagement also continued throughout the consultation period with a variety of agencies, organisations and communities.

## 2.0 SUMMARY OF COMMENTS FROM THE DRAFT NATIONAL PARK PLAN CONSULTATION

### 2.1 Respondents

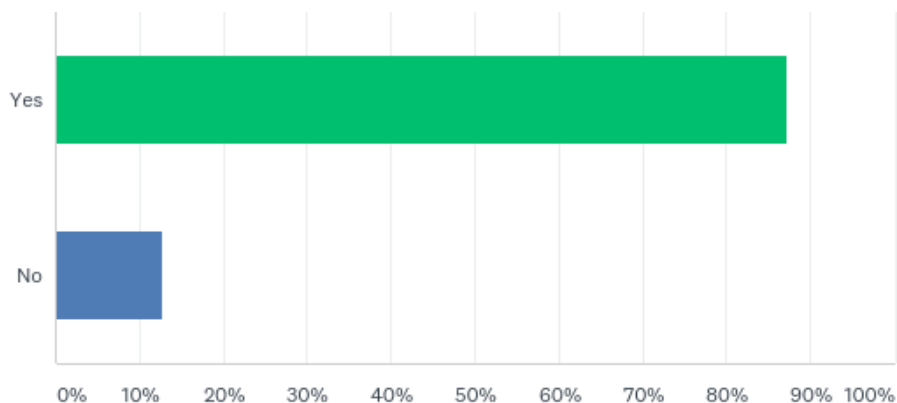
A total of 120 responses were received. Table 1 summarises the types of respondents. Appendix 1 provides a list of the organisations that responded.

**Table 1**

ANSWER CHOICES	RESPONSES	
Organisation	43.33%	52
Individual	56.67%	68
<b>TOTAL</b>		<b>120</b>

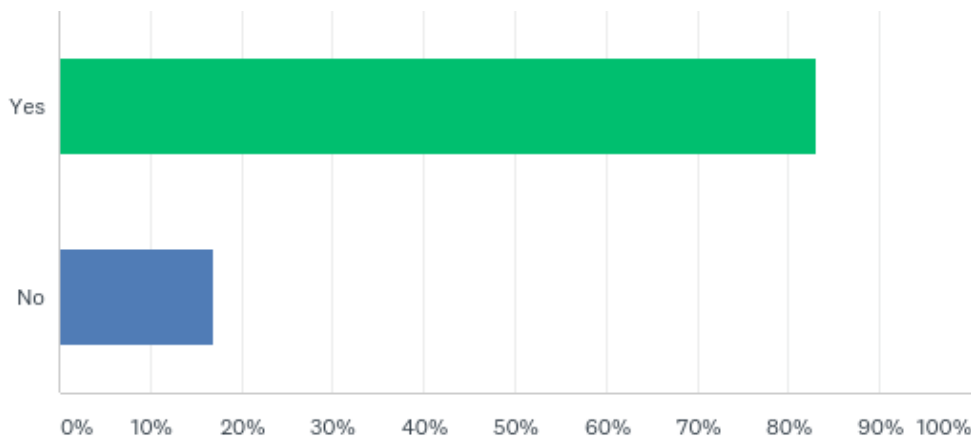
### 2.2 Conservation and Land Management

**Do you agree with the overarching Conservation vision? An internationally-renowned landscape, where nature, heritage, land and water are valued, managed, and enhanced to provide multiple benefits for people and nature.**



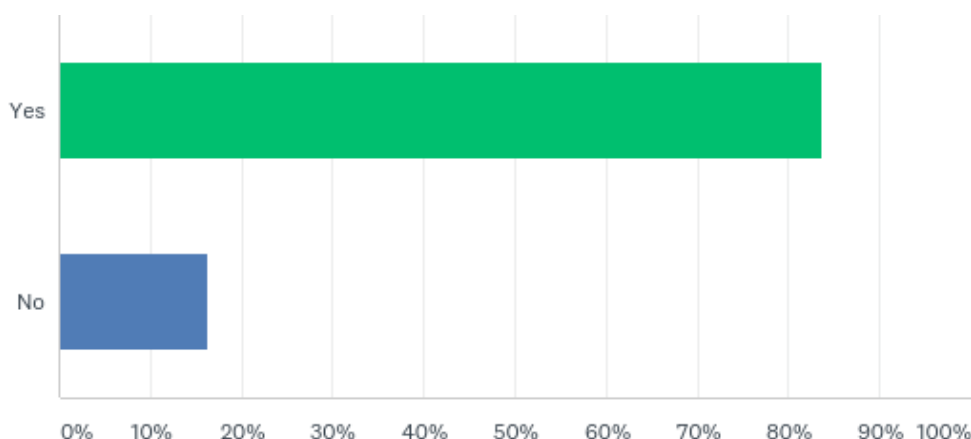
87% of respondents agreed with the overarching Conservation and Land Management vision. A number of additions and amendments were suggested to the vision including suggesting a switch in the order of people and nature so that a greater emphasis is placed on nature rather than people and that the vision wording could be simplified by reducing the length of the vision.

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



83% of respondents agreed with the identified outcomes and a number of suggestions for additional wording to the outcomes were received. These were mainly to either clarify or widen out the outcomes. This included more emphasis on the historic environment in the outcomes with a few responses highlighting that the current outcomes only refer to the natural environment. Other suggestions included rewording to more strongly recognise the value of the existing National Parks natural assets and for the plan to acknowledge that currently not all the Park's natural resources are in poor condition and in need of being restored.

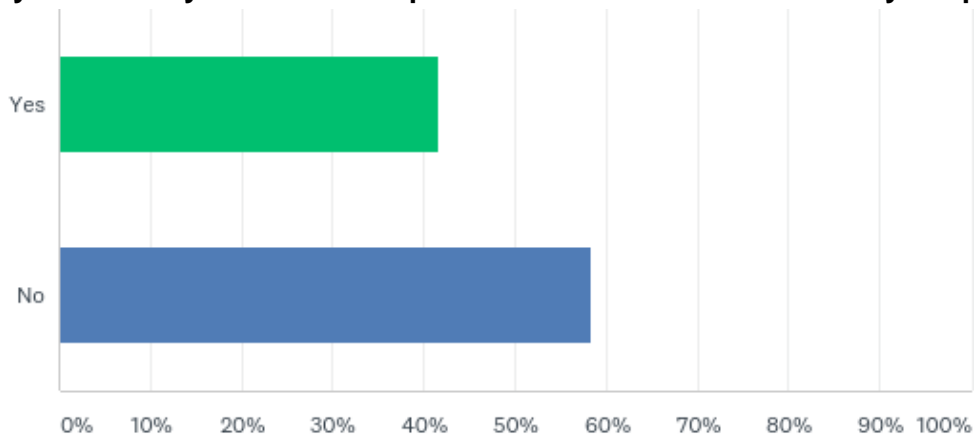
### Do you agree with the 11 Conservation priorities?



84% of respondents agreed with the identified conservation priorities with suggestions made for amendments to these and also some additional priorities. Several responders considered priorities could be improved by making them more specific. A number of responses queried the priority on woodland habitats and the consequences of this priority. The current wetland definition was suggested to be renamed to better describe the habitats covered. There were a number of different suggestions for alternative flagship species which could be used as well as suggestions on additional Invasive Non-

Native Species (INNS) which could be included. A number of respondents queried if the suggested water catchment based approach for INNS was appropriate and suggested other potential wording. Several responses suggested that enhanced opportunities to enjoy landscapes could be achieved by identifying strategic laybys or car parks and providing supporting infrastructure such as path networks, litter bins and toilets facilities.

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



There were a number of suggestions of areas not considered to be adequately covered by the priorities. The strongest theme was in relation to protection of the historic and cultural heritage, with a number of suggestions on how priorities could cover these. Other suggestions were very wide ranging, examples included seeking more emphasis on native woodland restoration and encouraging re-introductions of once native species. A couple of responses suggested that the Plan seeks closer liaison with research and education bodies with a possible benefit being to provide evaluation and data to support the work of the National Park Authority and its partners.

A couple of respondents queried if the large number of priorities in the plan were realistic to be delivered particularly with a backdrop of public sector funding declining and additional uncertainties raised by Brexit. A suggestion was that the plan could be more focussed by having more targeted priorities where the plan highlights resources required for delivering the identified priorities and outcomes.

**Measures of success**

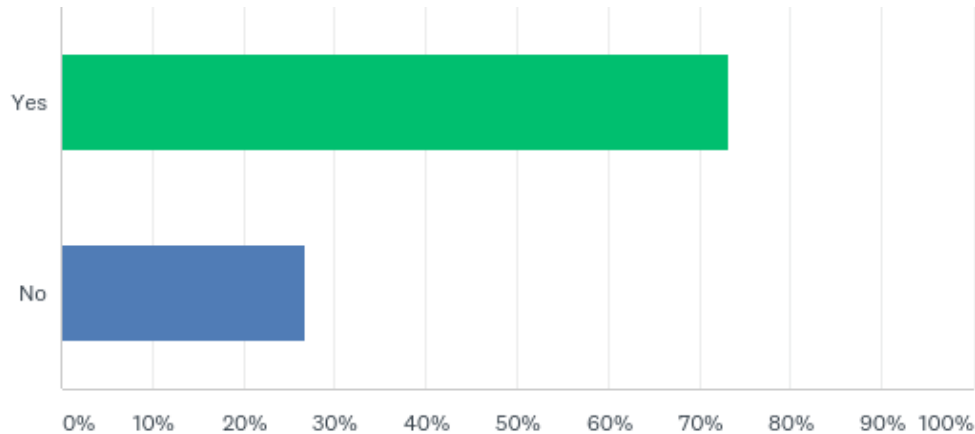
A significant number of consultees did not consider the current measures of success to be specific enough and also sought these to be more measurable. A number of people suggested alternative measures that could be used. Suggestions included CO2 emissions, species counts and recording the number of designated sites in favourable condition. A couple of comments queried the baseline information and sought the Plan to have milestones and a delivery schedule.

**Is your organisation willing to sign up to the delivery of the priorities?**

There appeared to be broad agreement from the named partners to sign up to delivery of the Plan and actions. Several responses made suggestions of additional partners and it was highlighted that for some user groups the list of partners was currently limited and should include more emphasis placed on the role of communities.

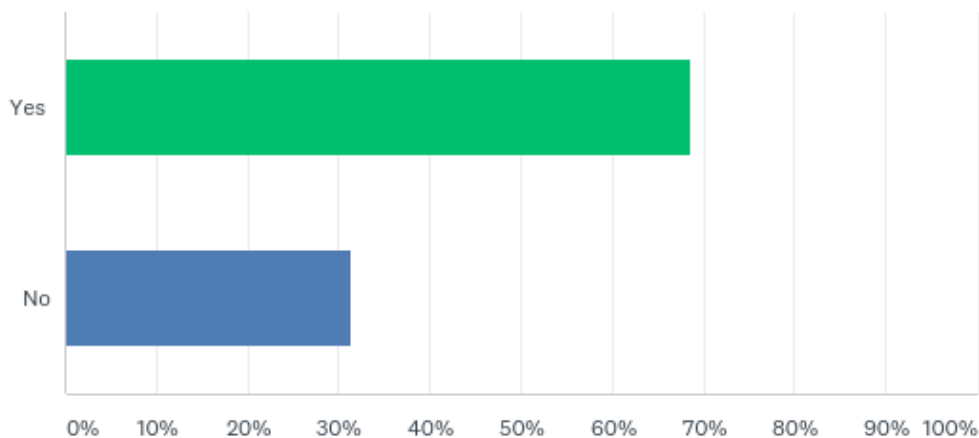
### 2.3 Visitor Experience

**Do you agree with the overarching Visitor Experience vision? The National Park provides a high quality, authentic experience for visitors from all backgrounds. There are many opportunities to enjoy recreation activities and appreciate the area’s outstanding natural and cultural heritage within an internationally-renowned landscape.**



73% of respondents agreed with the overarching Visitor Experience vision. A couple of responses suggested alternative wording to this. A number of comments and observations were raised regarding the achievement of the vision when camping management byelaws are in place.

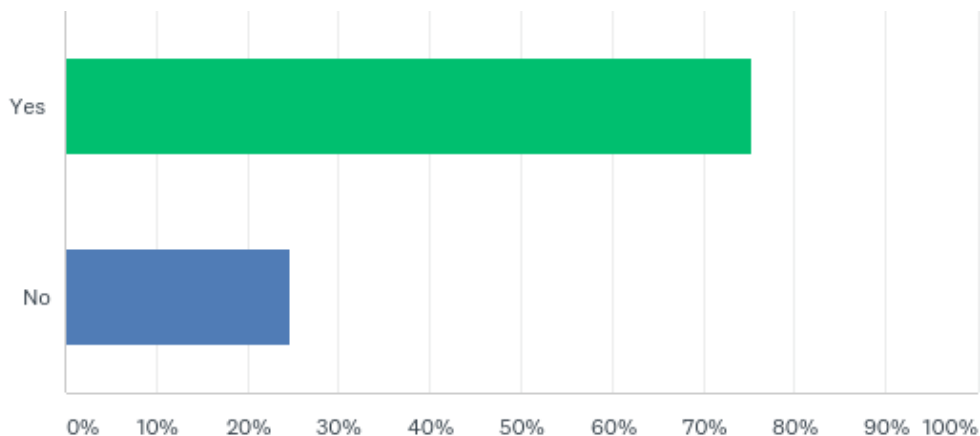
#### **Do you agree with the 5 Visitor Experience outcomes?**



68% of respondents agreed with the 5 Visitor Experience outcomes with a number of responses suggesting changes to the wording where it was felt that the outcome could be expanded or modified for certain interest groups. A number of responses made comments and observations around how well these outcomes are currently being achieved.

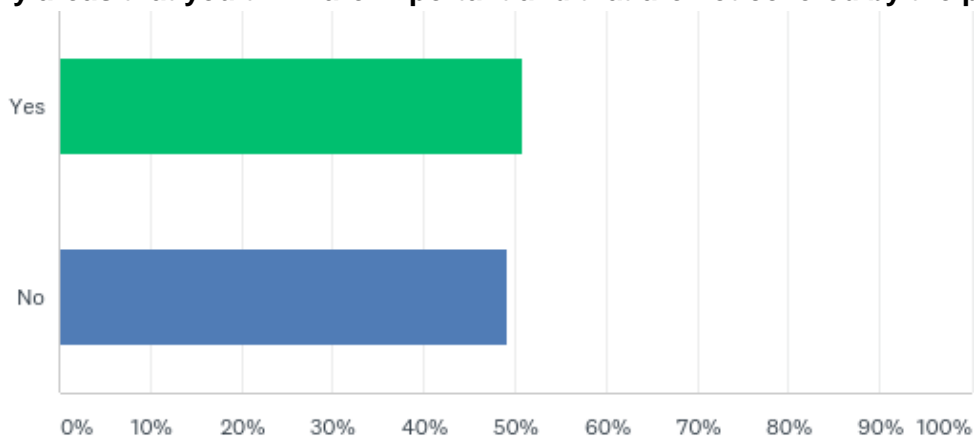


## Do you agree with the 20 Visitor Experience priorities?



75% of respondents agreed with the 20 Visitor Experience priorities with a number of responses seeking minor amendments or additions to the existing wording to expand on these. Visitor Experience Priority 14 received the largest number of individual comments with responses raising concerns about the Camping Management Zones.

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



There were numerous additional suggestions made for areas not covered by the priorities. Whilst these were very varied a few responses highlighted the need for a greater focus on improving and expanding public transport access to the area. Another common theme was that the Plan should place more emphasis on increasing the number of slipways and launching sites, particularly for small, low powered or unpowered craft. Other suggestions included actions to redress gaps in visitor infrastructure and actions that seek to develop and strengthen the potential of underutilised areas, including Cowal. A number of suggestions were made for the development and promotion of further outdoor access routes including long distance walking and cycling routes some of which should be accessible to all abilities.

### Measures of success

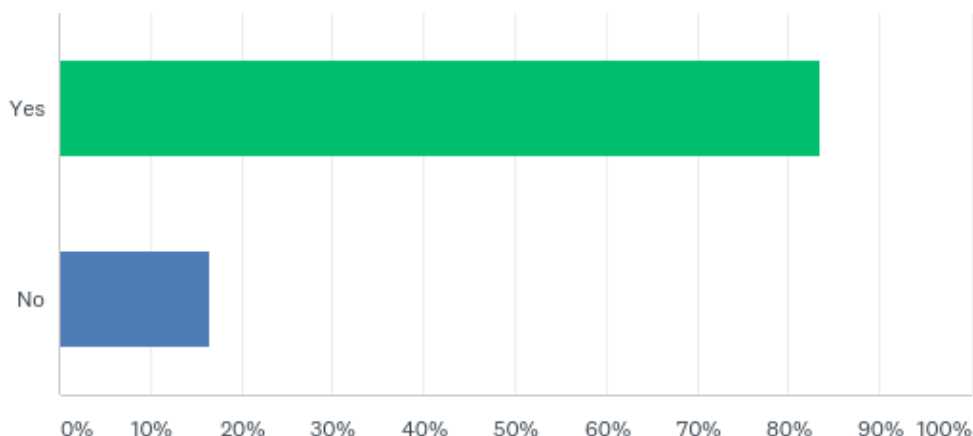
A few additional suggestions were received for additional measures of success. These included a specific success measure for the social inclusion priority and a suggestion to measure how publically available/accessible facilities are. A couple of respondents wanted to see more clearly defined measures of success in the Plan.

## Is your organisation willing to sign up to the delivery of the priorities?

There appeared to be broad agreement from the named partners to sign up to the Plan and their actions with a number of organisations highlighting how they could support the delivery of the priorities. Some organisations wanted to be named on additional actions whilst it was pointed out by a couple of responses that there are currently no recreational organisations identified as a delivery partner.

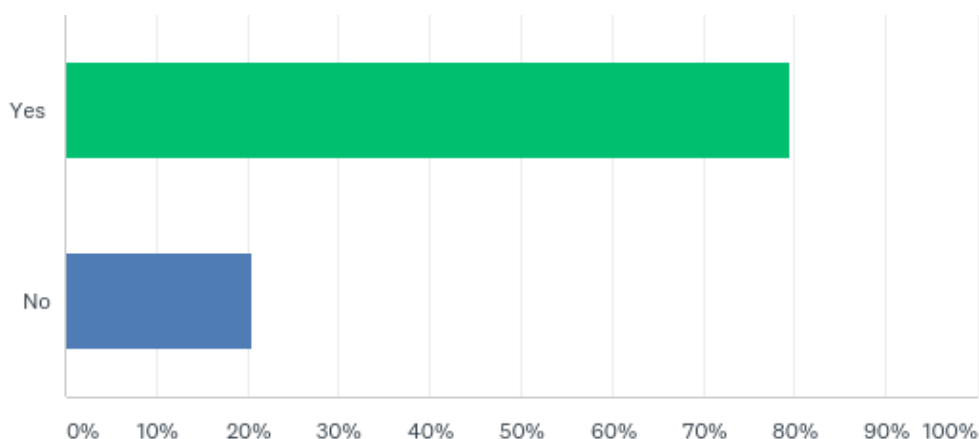
### 2.4 Rural Development

**Do you agree with the overarching Rural Development vision? In the National Park businesses and communities thrive and people live and work sustainably in a high quality environment.**



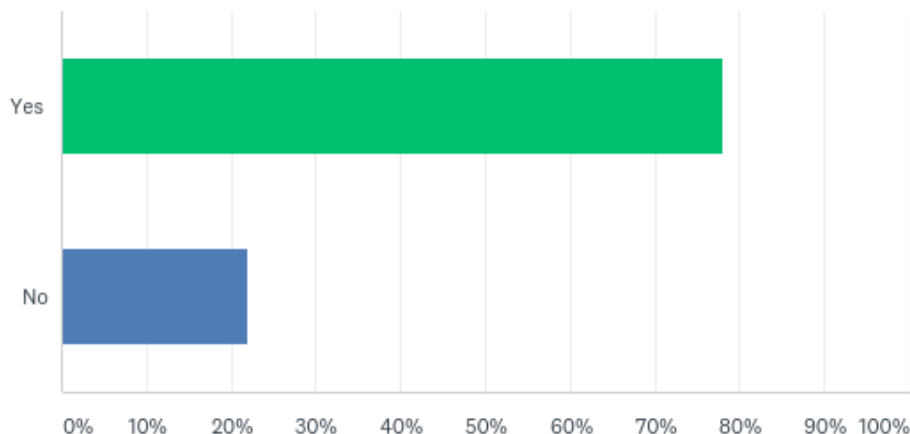
83% of respondents agreed with the overarching Rural Development vision. Of the comments received queries were mainly related on how delivery of the vision will be achieved.

**Do you agree with the 4 Rural Development outcomes?**



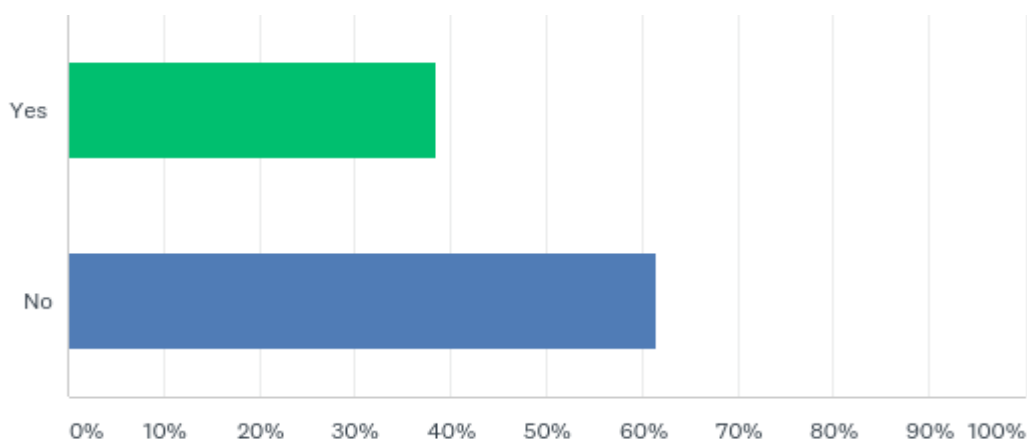
79% of respondents agreed with the four Rural Development outcomes with comments raised mainly around implementation and delivery of these. Several respondents sought amendments to the wording of the outcomes.

### Do you agree with the 19 Rural Development priorities?



78% of respondents agreed with the 19 Rural Development priorities. Comments were mainly around suggested wording changes and views expressed on how well these are currently being met, with a particular theme of planning applications. A couple of responses raised the potential impact of 'Brexit' as the delivery of many of these priorities and projects is likely to rely on European funding.

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



There were a number of additional suggestions for areas that respondents did not think had been adequately covered by the priorities. Suggestions included that the current priorities do not give sufficient attention to the Cowal area of the National Park with too much focus on the core of Loch Lomond and the area around it. Other themes included the need to support community development, skills and business support, support to primary producers to enhance and recognise current and potential role of land based sector, the careful balance needed between supporting economic development and housing with conservation of the environment and that the Plan could more clearly articulate other current plans and strategies such as Stirling City Deal.

### Measures of success

A few comments were received looking for additional measures of success including targets for all the measures of success, an example being for measuring energy efficiency as part of the low carbon sustainable development agenda.

### **Is your organisation willing to sign up to the delivery of the priorities?**

There appeared to be broad agreement from the named partners to sign up to the Plan and their actions. A number of the organisations highlighted specific priorities where they could be partners. A number of responses suggested additional delivery partners that could be included or in some cases alternative partners to themselves.

## **3.0 DRAFT STRATEGIC ENVIRONMENTAL ASSESSMENT**

---

Strategic Environmental Assessment (SEA) is a legal requirement for certain plans and programmes. The purpose of the SEA is to ensure that the likely significant effects on the environment of implementing the new National Park Partnership Plan (and of reasonable alternatives) are identified, described, evaluated and taken into account before the Plan is adopted. The environmental assessment of the draft Plan identified a range of primarily positive and neutral effects with some limited potential for minor negative effects to arise.

Following consultation on the draft Environmental Report comments were received from Historic Environment Scotland, Scottish Natural Heritage and Scottish Environment Protection Agency. These were generally in agreement with the main conclusions of the assessment, that there are unlikely to be significant negative environmental impacts as a result of the implementation of the draft National Park Partnership Plan.

One response suggested that some consideration is given to where impacts are identified as unknown in the assessment as to how implementation of those elements of the Plan can be monitored. This is to ensure that unforeseen adverse effects can be identified and mitigated. They wanted to see the post adoption report to include additional monitoring indicators to address this. This will be considered during the development of the post adoption statement.

Once the National Park Partnership Plan has been approved by the Scottish Ministers, a SEA post-adoption statement will be produced to indicate how the SEA has influenced the final National Park Partnership Plan.

## **4.0 DRAFT HABITATS REGULATION APPRAISAL (HRA)**

---

The Conservation (Natural Habitats, & c.) Regulations 1994 require that certain plans which are likely to have a significant effect on a European protected site must be subject to an 'Appropriate Assessment' by the plan-making authority. The process for determining whether an appropriate assessment is required, together with the appropriate assessment itself – is known as the Habitats Regulations Appraisal. European sites are Special Protection Areas (SPAs) designated under the EC Birds Directive to protect wild birds and Special Areas of Conservation (SACs) designated under the EC Habitats Directive to protect particular habitats and non-bird species. These sites together are called Natura sites.

In undertaking the HRA for the draft Plan it was concluded that no elements of the Plan will adversely affect the integrity of any European site in or connected to the National Park. Scottish Natural Heritage responded to the draft Habitats Regulations Appraisal (HRA). They confirmed that all the relevant Natura sites have been included in the appraisal and agree with the rationale and the sites that have scoped out of the appraisal (section three). They agreed with our conclusion in that as all the priorities have been screened out no part of the National Park Partnership Plan will adversely affect the integrity of any

European site in, or connected to the National Park. If any elements of the Plan are amended the assessment will need to be updated to still ensure no part of the National Park Partnership Plan will adversely affect the integrity of any European site in, or connected to the National Park.

## 5.0 Next Steps

The consultation responses are currently being considered in more detail and the next step is to make amendments to the Plan before presenting to the National Park Authority Board and then submission to Scottish Ministers in December for final approval. Once agreed by Scottish Ministers the document will be sent to all key partners and will be available on the National Park Authority website.

Copies of this report can be obtained from:

**Website**      [www.lochlomond-trossachs.org](http://www.lochlomond-trossachs.org)

**Email**        [nationalparkplan@lochlomond-trossachs.org](mailto:nationalparkplan@lochlomond-trossachs.org)

**Offices**      National Park Headquarters  
Carrochan  
Balloch  
G83 8EG  
01389 722 600

National Park Callander Office  
52-54 Main Street  
Callander  
FK17 8BD  
01389 722126

## **Appendix 1 List of organisations that completed a consultation response to the National Park Partnership Plan**

- 1 Friends of Loch Lomond & The Trossachs
- 2 Forestry Commission Scotland
- 3 Scottish Pilgrim Routes Forum
- 4 Transport Scotland
- 5 NFU Scotland
- 6 Buchanan Community Council
- 7 The National Park Destination group
- 8 skills development scotland
- 9 Ramblers Scotland
- 10 The Loch Lomond Association
- 11 Heritage Lottery Fund
- 12 Luss Estates
- 13 Ardentinny Community Council
- 14 Loch Lomond Sailing Club
- 15 RSPB
- 16 Argyll and Bute Economic Development
- 17 Scottish Natural Heritage
- 18 Stirling Council
- 19 Historic Environment Scotland
- 20 Scottish Land and Estates
- 21 The Royal Yachting Association Scotland (RYA Scotland),
- 22 Kilmun Community Council
- 23 Kilmarnock Community Council (KCC)
- 24 visitscotland
- 25 SEPA
- 26 Mountaineering Scotland
- 27 Strathard Community Council -additional comments
- 28 Port of Menteith Community Council
- 29 The Great Trossachs Forest
- 30 Montrose Estates
- 31 Perth and Kinross Council
- 32 Zero Waste Scotland
- 33 Clyde Marine Planning Partnership
- 34 sportscotland
- 35 Paths for All
- 36 Backbone: celebrating diversity through adventure CIC
- 37 Scottish Tourism Alliance 6/30/2017
- 38 National Trust for Scotland 6/30/2017
- 39 Sea Kayak Scotland
- 40 Stirling Council Housing Strategy & Development Team
- 41 Strathard Community Council
- 42 Glenfalloch Estate 6/28/2017
- 43 Loch Lomond Steamship Company (LLSC)
- 44 John Muir Trust 6/27/2017
- 45 Forest Enterprise Scotland
- 46 Strathfillan Community Council

47 River Forth Fisheries Trust

48 Comrie Croft

49 Trossachs Community Council

50 Transform Scotland (the national sustainable transport alliance)

51 Business Improvement Districts Scotland 5/8/2017