



Forestry and
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Regional Manager
Carol McGinnes

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RE: Planning Application 2020/0260/DET

Dear Vivien

As you know, we (FLS) have not yet been approached for landowner/manager permission for the proposed development proposals at the Loch Katrine Pier. However, we appreciate the chance to provide our views on this proposal. In response to your consultation request, we've considered our position and would offer you the following opinion as a significant stakeholder and local land manager.

Based on current information provided, proposed development of a new path and watchtower at Craig Leven (also referred to as Roderick Dhu), we have significant concerns about the proposals and feel it would be contrary to our position managing both national and European designated sites and priority habitat. The proposal is within the Ben A'an and Brenachoile SSSI and the Trossachs Woods SAC, both currently listed as being 'unfavourable declining' condition. From the maps provided, the proposal is also partially within land currently managed by FLS through a long term lease from Scottish Water. This is a remote area, difficult to access, that is not currently visited by tourists or anyone generally beyond FLS staff. Our database shows that the woodland here is also considered to be Ancient Semi-natural (ASNW) and is listed in the native woodland survey for Scotland (NWSS), both indicating upland woodland, which is also priority habitat.

Our concerns around this development are centred on:

- Construction phase impacts, both direct and indirect, which we expect to be larger than indicated in the planning application.
- Operational phase impacts, both direct and indirect, that could increase adverse effects on habitats, as well as interfere with our own management of the site and neighbouring areas, which is subject to specific objectives and KPIs, and aims to return the site to favourable condition.

- The likely impact on wider strategic implications for visitor management in the Katrine and immediately adjacent Achray zone.

Construction Phase

As the land manager responsible for improving and maintaining the designated sites under our ownership/management, we feel the proposal poses notable risk during construction, currently understated in the planning application. Our experience of similar constructions leads us to conclude more tree and woodland scrub and ground flora vegetation loss is to be expected, and that significant work (and therefore larger impact) would be required to safely construct a robust steep footpath (which would require robust drainage measures) and large watch tower structure. Woodland features expected to be impacted beyond the higher profile oak and birch trees include deadwood, remnant coppice alder, rocky outcrops and their associated species (e.g. lichens, bryophytes). There is also risk of indirect damage to features such as the wet woodland on the lower reaches of the slope which could have its hydrology negatively impacted.

The habitats present (upland oakwood and upland birchwood, as well as wet woodland) are also considered to be priority habitats in their own right, beyond features for designation. We, as a government agency, have a biodiversity duty in relation to the Scottish Biodiversity List, which indicates that all three habitats are listed as requiring “conservation action” and upland oakwood and wet woodland require ‘avoidance of negative impacts’.

Construction footprints are almost always larger than supposed during the planning stage (e.g. through loss of additional vegetation to accommodate contractor requirements for safe working, root damage from working too closely in a wooded area, the need to incorporate robust drainage features, the use of environmentally damaging materials such as concrete, and importation of materials not native to the site). Considering the sites’ status and given that case law indicates that even a small amount of loss of qualifying or priority habitat is significant, we would not wish to risk our own government-mandated targets to cause further, unnecessary damage.

Operational Phase

We also have concerns over the long term viability and expected liability of managing both a new visitor attraction here and the associated requirements for public use. Once constructed there would be a burden to ensure the health and safety of the users. This means constant maintenance of the single steep path, which experience tells us is likely to become braided with use (e.g. as seen on Conic Hill). Erosion as walkers step off the path to avoid each other (more likely in a post-Covid context) could lead to the path becoming wider over time resulting in a larger impact on key environmental features. Vegetation clearance of the path will also be required seasonally and the integrity of the path itself, being so steep, will be expected to require at least annual maintenance. Similar paths elsewhere usually become a channel for water flow and as we are seeing more extreme and unpredictable weather, this poses a reasonable risk to path usage and how it can be

maintained over time. This would also need an adjustment to drainage measures to adapt the changing path size and line.

The watch tower would also need regular checks on structural integrity and work to ensure safety on a regular basis. We also presume there would be an expectation to maintain the view from the tower, which includes cutting back vegetation (i.e. more impact on the ecological interests of the site). Once at the top, the safety of visitors roaming the site will be considered and it's not unreasonable to expect a fence might be required for public safety, which also means an increased impact footprint of the overall development. We've seen elsewhere that when an area is opened up to visitors, there is also a corresponding desire to explore further and wild camp. The gradual trampling of woodland flora by visitors who are likely to wander in an area currently very isolated would extend this impact on local ecology, as will the presence of dogs and an increase in litter. It would also result in a greater burden for those responsible to undertake safety inspections, maintenance checks/actions, and litter picks beyond the immediate footprint of the development.

Upon discussion with our wildlife ranger manager, it is clear such a proposal would affect our own efforts to control both herbivores and INNS, which are listed as the main threats to the designated sites. FLS has already spent a considerable amount of time and resource to reduce the presence of both, and while we can see the evidence of our efforts working, the presence of visitors in an area currently remote is not expected to be beneficial. Any anticipated herbivore displacement would be primarily during daylight hours and is expected to tail off as the animals become acclimatised to the presence of people. Visitors, especially non-local tourists, can also be found feeding herbivores (both deliberately and inadvertently through littering), which could eventually draw in these animals. If there is any displacement, it could push these animals into other more sensitive and difficult to access sites nearby. Additionally, the presence of such an increase in people could interfere with an already challenging programme for control (which already works around seasonal constraints).

Strategic Visitor Management

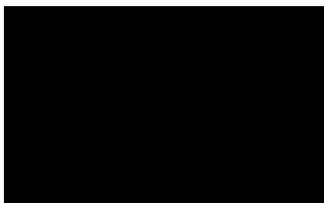
Finally, FLS is working hard to address the visitor pressures already experienced in the Katrine/Achray area. We are working around constraints posed by designations, public roads, and private land holdings to help resolve parking issues at the nearby Ben A'an and Ben Venu car parks; these issues have created significant and immediate health and safety obstructions. The particular constraints have forced us to scale down proposals in order to accommodate sensitive and priority habitats. Another visitor attraction is likely to add to this existing pressure in the immediate area at a time when our options are already significantly limited.

It is not apparent to FLS how the proposed development contributes to a local need that would counter-balance to the risk to habitats of high conservation value in this already pressured zone. Other options to gaining a spectacular view of the nearby lochs already exist (e.g. Bens Venu and

A'an). The proposed path is not more accessible than these hill walks (an accessible walk is already present along the north shore of Loch Katrine, along with the steamship itself), and there are better views elsewhere in the area that would impact on sensitive habitats less, e.g. the Stronachlachar View project, which is another new tourist attraction in the wider area that would be more accessible to all visitors.

I hope you find this useful in understanding the views of FLS and our responsibilities as a land manager.

Regards



Juli Titherington

Regional Environment Advisor

On behalf of Carol McGinnes.