



**Draft National Park Partnership Plan  
2024-2029:  
Report on Consultation**

Appendix Two: Verbatim Consultation Responses –  
Anonymous

## Section 1 - Restoring Nature

Question 1: **Do you have any comments on restoring nature for climate?**

It's critical that we take action, even if it's expensive and difficult. Currently watching at our rivers drying up and seeing the increasing risks of wildfires, floods and rising sea levels - all these pose risks to people and wildlife. You notice the difference in temperature when you walk or cycle in woodland, the air is cool and fresh, even on a baking hot day. We have to do something to mitigate climate change and biodiversity loss or we won't survive as a species.

The average punter doesn't know what any of this means practically (lack of education, awareness, info) and it needs to be hammered home to everyone in Scotland because visitor/business/resident buy-in will come through knowledge which in turn will lead to them caring.

Not really, glad something is being done, concerned about land being sold off to private individuals who may not hold the same values

Yes. I think it is a complete con. If you want to help the climate address issues in the developing world. We are the most minute problem in this country.

Locally deploy more rangers and paid for teams to tackle litter rather than vanity projects. We want tangible results not just endless consultations with little gain at the end

Deer numbers are very high and a threat to restoring nature for climate - how to convince estates with stalking interest to reduce numbers to sustainable levels?

- Everyone has a role to play in restoring Nature.
- Local people need to be aware of what the landowners are doing to restore nature in the local communities.
- Bring the deadlines forward - be bolder and braver to make change happen sooner.
- We are the National Park so we should be the fore-runners in making more significant positive impacts for nature.
- in 22 years - this long term vision seems so far away for us as young people.

It's essential to act now, the signs of climate change are increasing. Convincing people that action is required is such a challenge, it's human nature not to want to confront reality.

I'd like to see more emphasis on increased biodiversity and reintroduction of endemic flora and fauna species. This is synergistic with having a healthy ecosystem, and increasing the biomass in the park which acts as a carbon sink. It would shift the focus away from industrialization and exploitation of the park's resources and towards becoming good stewards of the land.

What about planting at the head of Loch Long to avoid litter coming ashore?

Lets do it

We need to restore our natural deciduous woodland, and remove at least some areas of conifer and replant with native deciduous. Around Ardentinny, the conifers are reducing light levels in the forest and outcompeting the native trees and we see a loss in native animals (e.g. red squirrel, pine martin). When these trees were smaller we had more animals around us I believe they have moved away over the last 20 years

**Question 2: What role can you play in Restoring Nature for Climate?**

I currently get involved in local community projects but I will try and influence our local place plan which is due for renewal to ensure that there is a focus on climate change. It can seem overwhelming and even pointless to try but a lot of people doing small things can make a difference as well as the essential larger scale projects.

Staying actively aware

By doing as I always have and picking up other people's litter from around the park

I have been involved in community projects and may continue to get involved but will certainly do all I can to promote this.

I can help spread the word and direct people to this Common Place.

We (as Junior Rangers and Young Volunteers) can physically help with practical tasks in the National Park - We can also influence other people

Give me the trees and I will plant them

What I might be able to

I could help FLS identify which areas of conifer need removal around Ardentinny., and then have them replaced by native deciduous planting

**Question 3: Do you have any comments on Restoring Nature for Healthy Ecosystems?**

Feels unrealistic to say nature decline will be reverse
Landowners are key here, as are the mechanisms by which they are funded (mechanisms which need drastically to change). Forestry and Land Scotland have identified their 2 environmental projects, but will refuse to do more.
Essential to undo some of the damage thats been done by over grazing and forestry.
- go faster - make more immediate change, now. - Make it more of a priority
There is no problem... I have seen no evidence to suggest there is. Only bold claims from lltnp
This is great and addresses my comments on the previous section! I wholeheartedly agree with the aims of the project.
Reed beds to filter pollution
lets do it
Remove conifer and replace with native deciduous trees. I would like to understand why Glen Finart river is classed as moderate status. Involve the Community Councils!

**Question 4: What role can you play in Restoring Nature for Healthy Ecosystem?**

Our community already contributes more that many. We work with the NPA, the Argyll Fisheries Trust and local landowners, doing our best to restore habitat and improve biodiversity. We will continue to do so, with the right support.
Have already taken part in community projects.

Continue as I am
Responding to volunteer calls
Help FLS and the NP to identify areas around Ardentinny that need addressed.
What I might be able to

**Question 5: Do you have any Comments on shaping a new Land Economy?**

FLS is the elephant in the room here. An acknowledged drive for increased profit while timber prices are high, is leaving great swathes of land clear-felled (justified by diseased Larch removal). Run-off, topsoil loss and land slips will reach unprecedented levels this winter. As mentioned in the previous question, mechanisms for funding landowners (perhaps tailored for those in the Park), need to change.
This is nothing but buzzwords... Absolutely meaningless
Addressing land ownership inequity or at the very least, regulating land use (including for housing) for rich landowners is fundamental for addressing social and climate inequalities.
We need more effort to curb invasive species
Increased interest in land for carbon could squeeze out smaller interests and concentrate land in hands of fewer richer possibly absent land owners.
While it's important to consider the economic aspect of nature restoration, I worry about subsidies aimed at private interests and large landholders. How will non-human and conservation needs be competitive with market-oriented production?
Lets do it

**Question 6: What role can you play in shaping a new land economy?**

We hope to form a local Land Use Forum where our community and landowners can engage outside the normal, confrontational touch point of planning applications.

Nothing because it is clearly nonsense

What I might be able to

Spread awareness of the issues related to land economy issues and share good practice to educate others on its importance.

## Section 2 - Creating a Sustainable Low-Carbon Destination

Question 1: **Do you have any comments on connecting everyone with nature?**

I agree more needs to be done to increase the diversity of visitors to the park. For many, getting to the park is a barrier as they either don't own a car, poor bus links etc. Wider options for cheap shuttle buses would be good - a bit like the Sherpa bus service in Snowdonia

The National Park is not accessible to large proportions of the population due to poor transport links that are not accessible, available and affordable. There is limited connectivity between transport hubs and accessible natural experiences. Active travel modes of cycling, walking and wheeling connect people with nature they need better integration into mobility hubs.

Question 2: **What role can you play in connecting everyone with nature?**

Help build a transport hub

Promote active travel and experience's that connect with nature. Share those experiences with others. Lobby for more and improved active travel corridors between communities that are also wildlife corridors supporting biodiversity and connections between people and nature.

Question 3: **Do you have any comments on Improving Popular Places and Routes?**

Fully agree with the need for better bus links from key areas with good train and bus services, such as Milngavie and Balloch. The buses should have decent capacity for bike storage as well (not just 2 bikes).

Drymen and Aberfoyle are key gateways and as such should be identified as visitor hubs where onward connections, options and opportunities can be presented to visitors. Similarly in the north of the park Crianlarich and Killin act as gateways where visitor opportunities can be highlighted and influenced. Active and sustainable travel connections between these gateways will help reduce visitor carbon footprints and help promote responsible behaviours

Question 4: **What role can you play in Improving Popular Places and Routes?**

Share good practice from elsewhere, advocate for connected gateway communities

Question 5: **Do you have any comments on Low Carbon Travel for Everyone?**

Agree this is a key priority.

I think ultimately, banning or charging for car use is the direction of travel (excuse the pun!). If a transport infrastructure could be established (but needs more funding) then a park and ride approach could a) limit use of cars etc b) allow more reactive management of visitor numbers on very busy days and c) send a message that when you're in a National Park, it's different to being in your local park (e.g. bbqs, litter, being a drunk idiot). If there was a transport infrastructure and a storage place for my kayak, I would happily use public transport to and from, but kayaking being my main activity, I have limited other options.

I definitely think that more public buses to allow easier access- and buses should have space for bikes.

If any access via car to the loch was blocked or monitored by physical means or electronic surveillance it would be met by social disobedience.

Infrastructure destroyed, work harassed.

No person or organisation can lay claim to this land or to the access. Any attempt to do will be blocked.

Look at Moray Councils MConnect service for an example of DRT that actually works. Direct employment of drivers and vehicles is the only way to make such a system viable.

To deliver the aims there needs to be full integration with incoming transport in terms of timing. A train arrives in Balloch every half hour yet onward travel to the hubs on the map are very irregular. A bus should connect to the train arrival and leave Balloch at least once an hour to East Loch Lomond, West Loch Lomond and beyond to Tyndrum, and Callendar. These services should run until the last train arrives for towns and villages close to Balloch.

There needs to be more opportunities for frequent, affordable and accessible sustainable transport that integrates with a safe and attractive active travel network.

**Question 6: What role can you play in delivering Low Carbon Travel for Everyone?**

Happy to help wherever I can and would certainly use public buses if there were more of them

I can use my bike and e-bike more for short local journeys and lobby for improvements to the sustainable transport service and active travel network. I can signpost to good practice examples.

### Section 3 – Enabling a Greener Economy and Sustainable Living

#### Question 1: **Do you have any comments on Transitioning to a Greener Rural Economy?**

You can not turn your back on commerce in a wider sense. You have accepted in the past the the zoerk's pupilation will increasingly be older people and commuters. I sense a change of emphasis but not a change of tge policies which have led to this.

Transition is a key word here. A fair proportion of the population would have already lived here before the National Park was formed 21 years ago. So what does it mean for them? Why does living in a National Park differ from living anywhere else? What about the people who have moved here since? Did they do so because it's a National Park, or just because it's beautiful? It might be helpful to call out benefits and constraints, the expectations and overheads, and what it actually means to be a resident in a National Park (this will be relevant for those whose homes are about to become part of the next National Park). Housing needs to made available for people with the capacity to make relevant contributions to a community. Moving the economically inactive into social housing schemes in rural areas and then not providing the necessary support to develop skills and employability is not the answer.

#### Question 2: **What role can you play in Transitioning to a Greener Rural Economy?**

Living in a National Park for me comes with a sense of responsibility for custodianship. Not to keep the place like some sort of museum or manicured tourist resort, rather to care for and enhance the natural environment. But that might not be the reality for those whose homes just happen to be within a National Park boundary. Why should they care? They would face the same day-to-day issues if they lived in Helensburgh or Dunoon, etc, perhaps with clearer lines of communication to planning and community services. Communities can help to spread the message, to represent, to be ambassadors for "National Park Living", but the expectations need to be clearer.

#### Question 3: **Do you have any comments on Living Well Locally?**

By definition, we are already living well in this environment. Some may say we are spoiled. The parlous condition of some of our trunk roads might be a result of that. Lack of engineering rather than climate change is the cause.

It's too easy for some to complain about the 10 minutes waiting at a roadworks, or that they don't have a hyper market within walking distance, etc. Context is everything. The National Park is a fantastic place to live, work and volunteer. Sure, there are specific problems associated with rural, remote living, of sharing our 'Place' with agriculture, forestry and tourism. But it's about partnership, respect, and some compromise, whilst remembering all the time why we choose to live here.

I think we need a community pantry

Question 4: **What role can you play in helping residents and communities to Live Well Locally?**

Try and bring a co-op to Arrochar

Simply playing our part. Of giving a little time and effort. Of sharing our place with others, with the perfectly reasonable expectation of mutual respect and care for our environment.

Question 5: **Do you have any comments on Harnessing Development and Infrastructure Investment?**

Balloch is full of dereliction sites, including the West River Bank, and semi derelict buildings (harsh?). I notice that you still eschew wind generation and mobile communication. Both are essential!

Strategic schemes need to be planned in conjunction with local, smaller scale infrastructure projects, such as cycle networks, footpaths and community transport schemes. Beneath the major road and rail initiatives lies a web of utter chaos and immense variation. Too much is left to communities to sort it out and to find the funding to do so. Landowners are in no way obliged or even incentivised to help. For every major plan, there needs to be an associated community impact/opportunity assessment (informed by Local Place Plans)

Question 6: **What role can you play in Harnessing Development and Infrastructure Investment?**

Develop a Local Place Plan with clearly identified infrastructure touch points, so that services can be coordinated and that changes (planned or un-planned) can be properly assessed.

## **Section 4 – Quick Survey**

### **Question 1: Tell us about your experiences of living, working or visiting the National Park**

<p>I enjoy living in the National Park, it is beautiful and needs conservation. It is a pity some residents and visitors just do not respect it. In particular visitors by leaving litter, destroying the nature through lighting fires, use of disposable bbq's, and not respect for how to drive on a single track road. Speed limits are ignored by both residents and visitors on the whole.</p>
<p>I love visiting the national park, particularly the Trossachs, to do open water swimming, walking and cycling. I have been swimming in these lochs for almost a decade, however post-lockdown, I visit a lot less often, usually confining myself to 'bad weather days' when I know areas will be quieter, as I can't stand the thought of traveling a 120 mile round trip to find I can't get parked anywhere, or get stressed about other users who are not following the access code or caring for the environment. I find most of my summer visits to be extremely stressful these days due to the influx of irresponsible visitors.</p>
<p>The natural park does not have the core values right, far too much upper management and now enough money spend on the rangers themselves to police and look after the park</p>
<p>LLTNPA are not fit to be custodians of the park. They are apparently unaccountable and clearly incompetent but nothing can be done about it.</p>
<p>We are the Youth Committee. Some of us live in the Park, and some of us live outside but come regularly to visit.</p>
<p>An amazing place to work and live, with fantastic cycling opportunities.</p>
<p>Born and raised in the National park. The whole area is a complete corrupt dictatorship presided over by the lltnp using absolutely fictitious arguments with no evidence whatsoever to push through their self serving agenda at vast tax payers expense. Most local people in the park loathe the lltnp. They are unelected and accountable to nobody. (despite their claims they lie to the Scottish ministers who just let them get away with whatever they propose)</p>
<p>National park is a great resource and a beautiful location. Unfortunately, during the summer it is spoilt by a few selfish visitors who come, leave rubbish, create noise and generally ruin everyone else's time. (Both in and out of the water) More work needs to be done about these anti social behaviours so that the experience of the park can be enjoyed unspoilt by all.</p>

Having read the plan it is a great wordy document and passes responsibility to all other bodies. Cut down the side of glossy documents. Encourage walking instead of transport to get around the park, ban vehicles within the park. Get the Co-op to open a store in Tarbet or Arrochar, or have a community store!

like interacting with visitors because they are from lots of different places and have lots of different experiences. It is an international destination.

- Love swimming in the Loch and water sports - non-motorised activities such as paddle boarding or kayaking. Dislike the loud noises from faster craft using Loch Lomond.

- Love camping in the National Park - wild camping experiences and Duke of Edinburgh. But some people can cause a nuisance through their behavior like drinking alcohol.

- School visits and outdoor learning experiences allowed us to learn about the nature of the Park more.

- Love Inchcailloch but litter problems and too many people behaving negatively have meant I haven't visited there in a while.

- We have experience of working in the National Park but some landowners were not welcoming and tried to stop us doing our job.

- I had a favourite beach but the Landowner has fenced it off so we can't visit there any more.

As a local resident who walks my dogs in the park daily I love the park; however I am very aware that during the summer months due to the number of visitors, which are in the region of 2 million, there requires to be a more adequate number of bins to accommodate the amount of litter on a daily basis.

I have loved the park all my life as I live in Balloch, I particularly enjoy watching the seasonal changes and all the wildlife that comes and goes through the seasons. I love meeting the visitors who come from all over the world to enjoy and be amazed by the park. Almost everyone I speak with are agreed that the noise from the jet skis combined with the pollution, does to varying degrees spoil their peace and tranquility within the park. I find the park a perfect haven for many things in life not least, assisting with mental health and day to day stress release

The national park is no longer a place to get away from it all its just turned into another cash cow for those at the top with no real benefits for those that use it

As an individual and visitor to the National Park I believe that I have a role to play as a citizen. I appreciate that our National Parks should be protected areas and should be treated differently to other areas of land - as I visitor I understand this and I'm willing to change my attitudes when visiting.

I live within sight of the National Park and go there frequently.

<p>It's a great place</p>
<p>Very poor infrastructure. Litter a national embarrassment caused by abdication of local councils responsibilities. Camping permit sites poor value for money.</p>
<p>I live about twenty minutes from the park and I visit often to go open water swimming and hillwalking. Ive walked the west highland way and climbed most of the hills and mountains in the park. In the last few years, certain areas have become too busy (Luss for example). There are too many vehicles on the A82 and its often gridlocked at busy times. Littering is becoming more of a problem. That said, the park is still one of my favourite places in the world.</p>
<p>I visit the National Park area at least once a year. I love the natural beauty and scenery. I enjoy walking in various areas and taking boat trips. I've stayed overnight a couple of times.</p>
<p>Its nature on our stop do not change it make it better for all to enjoy</p>
<p>The document is very good on looks and good on words, but lacking substance on how anything will be achieved! We in Arrochar are still seeing the top of the loch look like a tip, year after year. Beach cleans are great, tidies up a mess. No solution to the rubbish despite having the tools to do something about the rubbish, i.e. fine people for throwing rubbish! Do something that changes the environment of littering. Encourage businesses to set up in the park with the resources we have, wood in abundance would make great furniture! Derelict sites with workshops, may be a way forward! A co-operative shop to cut down on people travelling to get food supplies. A bit of structure to the park plan, to enable these things to come to fruition.</p>
<p>As a visitor, the park has lots of well managed access areas. However, there are also some significant 'hot spots' where access pressures are visible. I can see how this impacts and frustrates the land managers who are trying to make a living from the land. Funding for access management, and to actively work with the land managers where there are issues, should be a priority.</p>

Have lived, occasionally worked and often visited the area of the Park at times throughout my life, including prior to the Park status being awarded.  
I had hoped that with Park status rapid and significant improvement would have been made to public transport and cycling routes to access ALL areas of the Park. This has not been the case. The A85 has improved - speeded up. But there has been no investment into proper, two lane cycle "roads" to allow, safe quick and spacious access to and through our beautiful Park. Like car drivers cyclists do not want to stop ever few hundred meters to negotiate an obstacle, walker or gate / crossing - they travel at 17 to 30 km/HR.  
Nor has there been regular and plentiful bus service introduced to shuttle folk into and around the Park's key walking points. Service that allows early and late pick ups throughout the season. To say nothing of the limited water transport. It happens but could have more encouraged.  
Finally, the lack of tree felling/ clearance along the Lochside means that wether you are on the road, train or a bike in summer the views are often blocked or briefly glimpsed. After all we come to the Park to see the views and get in and about it!

I have experienced all these infrastructure services for visitors/users in other national parks and key tourist destinations across Europe. Why not for our premier national park?

Please do not think what we have is sufficient. It simply isn't of the quality and extent expected or able to meet the numbers visiting. Improve access and routes into and through the Park to international standards for cyclists and walkers as a priority. Visitor numbers (and consequential spend) will skyrocket. All pretty obvious I'd have thought and have often wondered why this wasn't the priority projects of the Park from the start.

I'm a hiker, I camp, and I've walked a lot around Lock Lomond. Based on an accessibility point of view its one of the best in Scotland, although sometimes paths are eroded. With DeafBlind Scotland, I have also joined Rangers on guided walks at Cashel Farm. There are three walks people can do in that area, easy, med, hard. We have found all of these walks very accessible.

XX I am acutely aware of the challenges to visitors, residents and workers resulting from inadequate coordination of public transport, very poor road maintenance, lack of social housing, and fragmentation of land ownership.

<p>A few trips a year to the water at Loch Lomond. Volunteer with RSPB.</p>
<p>Live and work here.</p>
<p>I like within the National park and I love it, although when visiting other UK National parks I feel like the Trossachs is lagging behind.</p>
<p>Live here.</p>
<p>Duke of Edinburgh - Gold. Inchmurn. Camping and Munro hiking.</p>
<p>Love it.</p>
<p>Visiting from Kilburnie, Ayrshire. Enjoying amusements at Lomond Shores, love outdoors and dino restaurant.</p>
<p>First time in the Park. Went on the Sculpture Walk - signage was bad.</p>
<p>Normally come for fish and sightseeing. Fishing in the different lochs and river.</p>
<p>Just popping in to see Loch Lomond before heading back to Germany.</p>
<p>I live in the National Park area (St Fillans). It is a beautiful area to live in and I feel truly lucky to be able to live there. I do not think that enough is being done presently to protect the NP - the landscape, nature and communities. Scotland is an incredibly important place in terms of climate, nature and biodiversity. However, people are allowed to use, pollute and destroy natural areas without any regulation or restrictions in NP areas. Issuing camping permits is a good example of some regulation working well. A lack of or no restrictions on the use of petrol/diesel vehicles on the Loch (in particular Loch Earn) is a significant cause for concern - jet skis pollute the Lochs and also create noise pollution which effects other people who wish to enjoy the area/ nature and neighbouring wildlife. This More need to be done to regulate the use of the Lochs for ALL.</p>

<p>Have been visiting and running in the Park for may years. A special place of delight and endurance.</p>
<p>Car park at Salloch is shut - why can't residents access it? Seasonal access not permitted.</p>
<p>Litter is a concern, especially at Milarrochy Bay. Impact on residents and dogs. Bins overflowing. It's the first thing you see when entering. Lack of diversion information at Buchanan Estate for HGVs. Not consistent info on the VMS/</p>
<p>Travel from Southampton by train or without car. Go to Aberfoyle and lochs - can be a barrier.</p>
<p>Live and work here.</p>
<p>Lived in the National Park for 16 years. Great place to bring up family - safe and friendly.</p>
<p>Well maintained, beautiful, quiet. Very accessible - road signs are good.</p>
<p>It's lovely to visit the National Park</p>
<p>Live and work.</p>
<p>It's great living in the National Park</p>
<p>Work in the Park - live nearby. Busy but good.</p>
<p>I work in the National Park and feel lucky to work here.</p>
<p>Lived here for 10 years - wouldn't live without it.</p>

<p>Overall good. Sad that Salloch is no longer open to punters, and Flamingo Land is ridiculous. Don't go up lochside during the summer - no parking and too busy.</p>
<p>I live and work in the National Park and I don't see the previous plans working</p>
<p>Only work in National Park - creates tourism for pharmacy. Travel to work from the other side of the Clyde by car.</p>
<p>Living and retired in the National Park</p>
<p>Poor public transport, particularly locally - Aberfoyle to Callander. Local amenities are awful. Where have the heritage grants gone? Countryside is accessible. Litter is a huge problem. Planning is inconsistent. Difficult to see positive impact of NP - signage and benches broken and not replaced.</p>
<p>Great - but scruffy in areas</p>
<p>Lived here for 50+ years.</p>
<p>Great but it has its drawbacks</p>
<p>Roads make it a bit of a nightmare. NP areas are quite good but bit of a disaster out with.</p>
<p>Moved to Drymen recently, it's lovely and quiet</p>
<p>Live in Drymen because of what it is - not the city. A walker and used to be a climber.</p>
<p>Visiting from USA</p>
<p>Live in Glasgow. Visit once every three months.</p>

<p>Live in Clydebank - mostly visit. Lots of young people drinking - lots of police. Environment really amazing.</p>
<p>I regularly visit the park as I live locally. I enjoy short walks in the Balloch area and longer walks in the Trossachs</p>
<p>Love the National Park - should be doing something to the castle - history.</p>
<p>Really nice - first time here. Lots of positive experiences and would visit again.</p>
<p>There is a good mix of outdoor recreation and nature rich places. Cycle paths could be improved upon to allow better access to places that are overrun by cars.</p>
<p>Staying having previously done day trips - Trossachs queen.</p>
<p>Own a cabin</p>
<p>Staying in an Air BnB - husband comes every Tuesday.</p>
<p>Planning issues living in the Park - took 3 years to get planning house which was backward and not progressive. Lack of parking can be a nightmare - make it more of a priority. Fast track side for Loch Lomond Road - leave low road for cycling.</p>
<p>Love it - recently moved.</p>
<p>First and second-time visitors from Virginia, USA.</p>
<p>I have stopped visiting because of the bad behaviour and the littering. I feel there is not enough to entice spending tourists.</p>

<p>Helensburgh, Loch Lomond, Ardentinnny. Nice, driving is easier. Boat on the loch and Luss.</p>
<p>Come out walking: Balloch Park, Luss, Lochside, Gartocharn</p>
<p>I no longer spend any recreational time in the park whatsoever - YOU LNTNPA have RUINED it.  Work only</p>
<p>On holiday from Australia - so many other places to visit.</p>
<p>Can't rely on transport with kids. Clean - preservation important.</p>
<p>It's OK. More toilets across the National Park.</p>
<p>Visitor to National Park - passing through.</p>
<p>Balloch, local - visit Luss to walk dogs. Anti-social problem which is particularly bad on sunny days and would think twice to go out then.</p>
<p>Balloch - avoid area with young children. Never visit anymore as dogs are out of control. Bad experience with child bitten in Balloch Park.</p>
<p>Local, Renton. Balloch Park, cycle paths, Lomond Shores, lochs, boat.</p>
<p>Work from home (Balloch). Leisure time locally with kids. Try to stay local, perfect for kids.</p>

<p>Resident and parent. Visit most weekends, driving three children. Visit Balloch/Luss/Aberfoyle.</p>
<p>I work &amp; live in the NP. I get annoyed when I see bags of litter left for days sometimes weeks after campervans or fishermen have been camping. Planning permission is given for holiday homes but hard for local people to build on their own land.</p>
<p>Travel every fortnight, family, travel by car. Clubs at Loch Lomond (photography). Challenging to get here - bus drivers can be an issue. Rarely trains.</p>
<p>Excellent recreational area. Better transport needed to some areas.</p>
<p>Great place to visit. Beautiful.</p>
<p>Visiting from California.</p>
<p>Visiting from Germany - enjoying visit for 2 days.</p>
<p>I come regularly with my dog and used to visit with my children when they were young. I love the scenery and solitude.</p>
<p>Visit from Glasgow - not as often as I would like. Family - 2 kids.</p>
<p>Live here and work here. Used to go to school in Callander.</p>

<p>Visit once or twice a year.</p>
<p>Own a company providing water activities - kayaks, boats, safety gear.</p>
<p>Lived here for 20+ years with family. Family now live in Glasgow but they like to come to events like the Highland Games together.</p>
<p>Live just outside the Park. Come here for events and spend time with kids outside - walking, cycling, hills.</p>
<p>Visit a few times each summer. Like events such as Highland Games in Balloch which are easy to get to - struggle to get to less accessible areas.</p>
<p>Beautiful place to live. The persistent push for more tourism without the infrastructure has taken its toll on the natural environment and the local population.</p>
<p>Lovely to visit but of course honeypots are very busy and its ever a challenge to manage. This in general is done well but Im always worried about over exploitation esp by those who spend just a few hours. We need more slow tourism.</p>
<p>Its a great place apart from the litter everywhere!</p>
<p>Live here Traffic congestion is bad when busy with events and holidaymakers. Enjoy walking and along the river leven and the bay at lomond shores daily lots of Wilde life....deer,swans,ducks,red squirrels,woodpeckers swallows etc if the flamingoland development proposal is accepted I will lose the freedom to enjoy the local wildlife on the west side of Balloch as most of this area will be developed.</p>
<p>Living in the west side of Balloch is difficult due to traffic congestion on busy days. This would be made extremely difficult if the flamingoland was allowed as their customers and staf are very unlikely to use public transport. It should be noted that flamingoland proposals are encouraging private car usage (for customers and staff) with the vast amount of car parking spaces they are proposing in their plans. It is very nice to walk around the river leven and the bay at lomond shores each morning, enjoying the deer,swans, ducks and gulls, this space and freedom would be taken away from me and no doubt them, if the flamingoland development was given the go ahead.</p>
<p>Welcoming and beautiful nature</p>

Cannot explore enough without a car and have not seen viable alternatives
<p>I live just outside the Park and take friends and family into the Park to cycle, swim, boat, eat, and have flown over. Anytime of year but mostly out of busy season and avoid hot spots.</p> <p>I try to cycle to meetings and events or part drive and cycle. Volunteered in many active travel projects. Active in the Cycle Stirling network, planning comments re better cycling infrastructure, Sustrans volunteer maintaining routes, auditing barriers, mileposts, wildlife. On management group XXXXXXXX supporting a wide range of rural businesses and communities: eg tea rooms, accommodation, transport, farming, food, the past Breadalbane bus, Cycle tourism project.</p>
Lived in Helensburgh and Glasgow for a number of years using the national park almost every week for recreational reasons
I like its a natural beauty spot wild and limited big development.
It has been a disaster, I have lived here for 26years and since the national park authority has been involved, things are much worse. The roads are jammed, callander main street is full of empty shops, capercaillie, wild cats, common scoters, preal bordered fritillaries - all gone, invasive species cover cowl like the massive boats and wild jet bikers on loch Lomond. It has become the embarrassment of Scotland.
Living here is an absolute nightmare as the ltnp are more interested in promoting a concrete jungle than preserving and promoting nature
It makes people really enjoy nature and I love going to it as its so peaceful
I've always enjoyed going with friends and family. It's such a beautiful area and a great place to relax.
As a National Park volunteer I am in the area quite a lot in addition to non volunteering visits and activities. It is a great place to visit clearly with such stunning scenery, wildlife, nature and related activities. But that of course generates lots of pressures and problems at times and in certain locations which can sometimes undermine that experience and enjoyment as well as causing issues for people living and working in the area.
Lovely spaces but have found the signed cycletracks difficult to use on my adapted cycle. It would be great to get these areas up to standard (cattle grids, narrow gaps, small bridges all prevent me using the routes away from traffic which would get me on them most days!

<p>I live in the trossachs and value it highly. I am frustrated by the lack of public access to lochs - similar waterways in other countries have slipways for public use - why not in Scotland? Simple concrete ramps that allow small boat access would encourage use of the water. Equally many lochs disallow motors - including modern electric motors which are low pollution and sustainable. Loch access is tightly controlled by a small number of people and not managed in a way that encourages wide public use - with the exception of Loch Lomond. Please invest in slipways and encourage the growth of on-the-water recreation.</p>
<p>Live near it and visit it often for walks. During summer it is very busy and car parks are so full.</p>
<p>Casual visitor - often with international visitors to Scotland - showcases our natural capital</p>
<p>LACK OF SUSTAINABLE PUBLIC TRANSPORT/ LACK OF PUBLIC TOILETS/ LACK OF LITTER COLLECTIONS/ LACK OF ENFORCEMENT FOR SFATY OF CAR PARKING ON ROADSIDE/ LACK OF ENFORCEMENT FOR CAMPING OUTWITH DESIGNATED ZONES</p>
<p>As a local who has fished Loch Lomond for over 40 years ,I believe that the amount of nuisance caused by the jet skis has now become an issue not just on the loch but also the noise generated by them is now a nuisance around the loch</p>
<p>It is beautiful however the facilities put in place to support the amount of people who use it at key geographical areas is lacking. Places like duck bay and other easily accessible swimming areas quickly overtop the bins provided and there is no enforcement of bylaws so dangerous operating of equipment like jet skis is common.</p>
<p>I live just outside the park and drive to the park area to walk, run, cycle and kayak. I wish it was easier to get around the area or more loops for activities. I have kayaked up the loch and caught train back to Tarbert. I have also been stuck at Inveruglus with my young children having walked from Arrochar through Glen Loin and meeting a full bus from Campbeltown. I used to shop at Loch Lomond Shores but it's retail offer has declined significantly over the years. It would be useful to have more kayak launch points. The visitor offer for food seems sporadic with some places opening then shutting. Inveruglus seems to fare well. I'd appreciate some navigation and other outdoor training classes.</p>
<p>LIVING IN THE NATIONAL PARK: ENJOY GREATLY THE RURAL LOCATION, HILLS, LOCH ETC.</p> <p>ONE DISLIKE: NOISE CREATED BY JET SKIS ON THE LOCH</p>

<p>I have no street lights, red squirrels, woodpeckers, deer and occasional pine marten in the garden, life-enhancing. I pick up litter from the road verges - sadly it accumulates again.</p>
<p>Living in the National Park is a truly beautiful and amazing place. I want to live among nature and do as much as I can to contribute to making the park diverse and a place nature can thrive.</p>
<p>National Park would be wonderful, *IF* powered craft were banned from Loch Earn. In particular, the dreadful Jetskis that roar round in circles for 10 hours a day at weekends, and the power boats that are so noisy. There is no place for any of these on an inland waterway, and they should be banned.</p>
<p>During COVID in particular the camping bye laws seemed to be never enforced in the St Fillans area and this resulted in anti social behaviour and wild camping. We are somewhat dismayed re the current enforcement of planning issues in the St Fillans Area it would appear that a "property"™ has been let for the past several months for holiday accommodation without the current planning application being approved and it is in our opinion a "mockery"™ of the current planning laws with in the park</p>
<p>Love living in a National Park, wish other would treat it better. I love the access to the hill, paths need to be kept better specially in our area Lochgoilhead. Feel rather forgotten about. In our area, we are kindof out the Loop.</p> <p>Issue getting planning permission is very hard, one rule for one, one for another.</p> <p>Over all, the area in the national park area amazing and we are lucky to live here.</p>
<p>Love living in a National Park. The down side is planning permission in this area. People don't always treat this area well, with litter etc. Wish more paths where kept better, where I live Lochgoilhead, they have been forgotten about.</p> <p>Upside is the nature and the fact there is so much to do outdoor. We love hiking and biking, so a brilliant area to be.</p>
<p>I visit a couple of times a year and enjoy making the most of the outdoors. Climbing the hill, swimming and kayaking in the lochs</p>

I regularly pass through and visit the national park. I enjoy its beauty in all weathers. And maybe I prefer it when its bad weather, with fewer people around! I want to preserve and protect all that it is, but also enhance and restore what is needed. I see many others enjoying these spaces, inadvertently causing harm. It would be good to see steps being taken to educate and encourage people to nurture the park, its flora and fauna, inhabitants and infrastructure.

We live in an area of outstanding beauty which lends itself to a variety of outdoor pursuits. My experience of the area is good. Problem areas include antisocial behaviour, littering and during busy periods traffic management.

The popular spots get congested, the roads busy with traffic, toilets and parking never seem to be kept clean, tidy and working.  
Not enough people running local businesses that know what theyre doing.  
Beginning to get too commercialised or tourist tatty. Enough of the tartan and bagpipe approach, lets move on and offer good food, good accommodation, guided walks, wild camping (limited) no caravans, no power boats or jet skis on the Loch.

I visit the national park for fishing and camping, but find access difficult to access with my large amount of fishing equipment and camping gear, also feel there should be more Rangers to patrol park.

I live and work in the National Park - a stunningly beautiful place marred by swarms of campervans (domestic transportation is Scotlands number 1 cause of CO2 - and campervans are the highest contributors in addition to being notorious for bringing the entire road network to a standstill) and tourist traffic generally (bringing additional noise and air pollution). Roads congestion is compounded by cyclists using the only roads instead of cycle-paths to the detriment of residents trying to work (often understandably due to lack of clear cycle-path signage and encouragement). Massive litter problem - particularly around bank holidays with residents being left to deal with the majority of the mess. Frequently have to contend with tourists parking in driveway (in a no stopping zone), urinating and dedicating in or around my garden and occasional thefts. The contrast with lockdown during peak COVID highlighted how damaging current visitor arrangements are to nature. We need to find a new way for visitors to all enjoy the National Park without the current disproportionate adverse impact on the environment and unfair burden on residents and others who work in the National Park. In addition to these challenges, we've seeing significant problems caused by the increasing number of holiday home owners in the area (many ostensibly undeclared as second homes) - which has seen our local facilities disappear entirely and has destroyed the local community.

I feel proud and privileged to live and work in such a beautiful location.

too much regulation. too many "dont do this; do that; go there; don't go there notices. too many plastic tubes. too many non-native invasive species

<p>Tress are felled on the hills impacting on views yet locals trying to maintain their properties are heavily restricted when trying to maintain their properties in the park and priority given to larger loch areas facilities compared to Loch Earn</p>
<p>We live on the north shore of loch earn and are disappointed and in fact horrified about how every year it is utterly disgusting. We watch campers cut down our trees, leave bags and boxes of rubbish and most offensively poo both on the shore and in our fields where there are sheep, birds and natural wildlife . The sheer volume of poo and tissue left behind is so dreadful that we can smell it from our home and we see birds dead on the shore due to eating it. The basic fact of the matter is Loch Lomond takes money for camping but in the case of loch earn offers no facilities such as bins or toilets. This is not helping the environment it is ruining it and this year a group of residents has decided to send our pictures to national press telling people to stay away unless they want to wade in human poo. Shame on you.</p>
<p>As Chair of the Friends of Loch Lomond and The Trossachs and Convener of Helensburgh and District Access Trust I have a wide experience of the LL&amp;TNP. I hope that both of these bodies will be submitting more detailed comment on your Draft Partnership Plan.</p>
<p>I'm visiting this Park for the first time. I liked it so much.</p>
<p>I like the nature around the National Park but I rarely get to see it (fault of my own). The area near my house is accessible to me though and I love it.</p>
<p>As a contracted worker, I have always found it a pleasant place to come.</p>
<p>Lots of litter makes it difficult to enjoy! More bins and frequently emptying would go a long way to enhancing the park.</p>

**Question 2: What is the biggest challenge you have faced while living and working in or visiting the National Park?**

<p>Parking and congestion. Litter</p>
<p>Lack of services for locals, in particular for young people to find meaningful employment. Poor bus services. Visitors who leave behind their rubbish, dog fouling and general bad behaviour.</p>

I find locations where I once sought solitude and happiness are now overrun with irresponsible users, which ruins my enjoyment and the tranquility of the place. It stresses me out so much that I choose not to visit the park as often now.

Removal of access to the loch for boats

LLTNPA staff and policies

Sustainable transport options.  
Finding out info that's suitable for us.

People who don't know how to behave in such a place (littering, parking on verges, cutting down trees for fires)

Poor public transport- especially those that can carry a full sized bike

The ridiculous corruption and web of lies and non tangible evidence the lltnp use to push through their own agenda

Jet skis, crazy driving and littering

Rubbish and bins that are emptied daily!

- Parking - spaces taken up by large campervans or irresponsible parking by other visitors.
- Hard to get to the National Park without a car - some places are difficult to get to, or get very busy quickly - unsure when you leave if there will be a space in the car park.
- Public transport isn't reliable and doesn't link up with the train times in Balloch. Connections and separate tickets are complex. Getting from Balmaha to Cashel for example isn't possible unless you walk.
- Tourist prices mean buying food or drink on a visit can be off putting. Then charging us to use the toilet in many places - and if we don't carry change then we can't use the facilities.

It isn't as developed as it needs to be. Wild is not better.

Some of the issues that i do not like are the drinking alcohol in public especially with children playing in the area. Also the noise from the jetskis often force me to leave the park early.

The change Brought in by the parks authority and others I accepted changes were need but not to the detriment of of those who live within and have used the park in the right way

Probably traffic congestion in hotspot areas. These are typically hard to access sustainable during peak visitor season - I do try and avoid them during that time.

I've also noticed that there is a significant increase in visitor numbers post-COVID and this has also had an impact on how responsible visitors are.

There is a conflict between retaining the purity of the natural environment and visitor access. While there are some nodes for mass parking, smaller car access points, even just off the main roads are left to whatever can be driven onto. This typifies well known wider problems (incl housing, etc) of balancing contradictions and reaching compromises that really work at optimal levels. It is as much philosophical as environmental as this is a major resource for the people of Scotland while the environment remains somewhat fragile and in need of balance.

Litter

Public transport access. Toilets. Ben AAnn car park an open sewer. Stench at permit sites. Irresponsible parking. Inconsistent enforcement of bylaws.

Too much traffic and too many visitors not respecting others or nature (littering, rowdiness etc)

Many places in the National Park aren't accessible without a car (or by walking very long distances). It would be great to have the opportunity to spend more time in these areas with more public transport options like electric buses. This could also help spread visitors out and avoid overcrowding in a few busy areas.

Access to the area but as I dont drive I dont want it over run with cars only nature

Litter
The amount of rubbish
Lack of car parking facilities.
Finding high-quality accommodation that is dog friendly is a bit of a challenge.
Access and cycle friendly routes
Mobility issues, especially on a walk or hike where you can't really get people on wheelchairs Camping and lack of facilities for deaf blind or disabled people.
Stirling Council
Public transport - no car for a while. Dogs off leads - uncomfortable with other dogs.
Cost of things - food, fuel, more expensive in rural area. We are always left behind in terms of investment.
Lack of public transport/volume of traffic
Very friendly place but I think there's an overreliance on tourism. Could do with being more resilient. Transport without a car isn't easy - poor bus service.
Weekend campers - toileting, repairs.
Flamingo Land. Over-development. Litter in Balloch Park.

Transport.  
Shelter areas for rainy days.

Nothing so far.  
Won't use public transport on holiday because of the kids.

Midges.  
Seeing littering.

The train helped to get to the National Park.

The biggest challenge is preserving the nature and environment in the NP area. Unregulated use of the Loch by PWCs and lack of any form of policing of noise and pollutants. In summer local communities require more support around behaviour of loch users. People should be able to enjoy the area.

Access to the remoter parts, either caused by poor public transport or overcrowding with other visitors

Motorhomes in Drymen Road car park.  
Locals should have parking at various car parks - first few hours free and pay after.

Parking - Drymen and up to Rowardennan. No adequate parking within Drymen or Balmaha or Milarrochy.  
One bus from Balloch to Balmaha - don't use the service as it's too far from home.  
More people are walking from Balloch to Drymen which is unsafe. Would like a lochside walk but would impact on farmers' land.

Accents

A lack of public transport and toilets.

Lack of public transport and litter

Nothing yet.
Road works and diversions on our visit.
Transport - so hard to get anywhere without a car.
Litter, lack of bins and facilities. It is a quiet village and can sometimes miss more interaction. Cycle path not signed clearly enough - leads to more bikes on the road.
Roadworks. Public transport. Lack of drive to work and no backup if I can't get staff because they can't get to work. Pricing of public transport.
Condition of roads and road closures.
Parking your car - accessible parking, especially for wheelchairs. Better ramps. Toilets for tourists.
Flamingo Land - similar to what's happening at Loch Tay.
Litter, parking and general upkeep. Better public transport and connectivity between smaller villages needed. Businesses have issues with staff as there is not reliable public transport.
COVID - still feeling the effects of that now.
Public transport, retired people not encouraged to stay, lack of services in some areas. Visitor pressures.
Litter. Transport. Job opportunities.

Lack of pavements and limited public transport
No challenges, except the tubs of flowers on the road.
Bus links Infrastructure
Roads
Transport - can't get to Stirling from Drymen without a car and I'd like to use my bus pass.
Housing for local people and visiting. Transport - can't get to Stirling from Drymen - too isolated.
Trails well marked easy to get crowded.
Travel - time and cost (rail is expensive)
Anti-social behaviour. Car access - not always accessible. Public transport improved.
. Access is vital and for me improved public transport around the park is a necessity. Without a car large areas of the park are inaccessible without a car. I also would welcome improved cycle access from Balloch to the east of Loch Lomond
Anti-social behaviour. More acting. More affordable housing.
No issues - campervan so easy to access. No issue with places to stay.
Lack of parking in areas. Lack of common sense by many drivers and parking in unsuitable places. Litter in the countryside too.

No challenges
Climate change. No power available. Remaining legislation around taxis and opportunities to do it. Stop giving accommodation to immigrants.
No challenges.
Congestion during busy periods - could be an education thing. Litter - this can depend on the area.
Parking - availability and price. Public transport.
Not enough to do when visiting Anti social behaviour
No issues
Not personally
The completely out of touch Corporate seat warmers at LLTNPA Including its Jobsworth Ranger Service
Drove there today. Would consider public transport if better.
Driving to get places
Toilet, car transport - public support.

Littering is an issue.
Dogs - off the lead and attacking children. Would be more likely to visit.
Cleanliness - litter, folk leaving mess/litter. Balloch cycle path/beaches.
Traffic congestion. Unsustainable traffic (e.g. McDonalds). Traffic levels.
Travelling without car with children. Road closures, A82, busy traffic, detours home.
Inconsiderate & dangerous parking. Litter left by tourists.
Travel - biggest issue as a wheelchair user.
Litter. Parking in more remote areas.
None
Toilets easy to get to. Trains as clarity of services to NPA. More connecting of National Park via public transport.
No bikes. Own car.
Probably the weather but that can't be helped.
Bins and finding food here in more rural areas. Camping equipment needed for people to try.

<p>Too many visitors making roads too busy and dangerous parking. Balance between tourism and facilities for residents.</p>
<p>Not sure where to go, where has parking, not sure if I can get from home to Balloch easily on public transport. Bins.</p>
<p>Pandemic saw more people come here but slower business this year and people are not looking for activities to pay for - they want a free day out.</p>
<p>Daughter couldn't find a job so moved with grandsons to the city. Price of events to bring family out to.</p>
<p>Parking - not easy to use public transport with kids. Too expensive and can't bring all the gear.</p>
<p>Not everywhere is wheelchair friendly, especially buses and walking routes.</p>
<p>Trying to conserve the abundant natural environment from planning pressures that in some cases seem to have been supported by the LLTNP planners before even coming to committee. Lack of transparency within the LLTNP organisation is a problem. Poor decisions would include the Tydrum Gold Mine - an environmental disaster.</p>
<p>Litter, litter and litter</p>
<p>The flamingoland development proposal</p>
<p>The threat of the proposed development by flamingoland ( lomond banks)</p>
<p>I don't live or work in the area</p>
<p>Need a car</p>

Lack of progress for joined up cycling routes connecting communities. It should be highlighted as priority infrastructure to enable sustainable transport and link with buses/trains/ferries. Not just local active travel. The strategic position of the NP offers more entry points by different modes of sustainable transport. Perhaps due to a lack of cycling knowledge and fragmented responsibilities of many organisations, and allowing landowners to prevent reasonable improvements. Yet now with e-power to lengthen journeys and flatten hills, cycling can be a practical and inclusive travel solution for many more people - all ages and abilities. And a great way for visitors to travel to and across the park. And to engage with nature and all seasons.

accessible transport options - not enough public transport options that allow bikes/ difficult timings for walks etc

Public transport irresponsible tourism. People not respecting environment.

Lomond banks Flamingoland proposed development.

Transport issues

It's sometimes difficult to get there due to public transport so I cannot go as frequently as I'd like to.

Just the pressures from volume of visitors and some of the behaviour that can come with this which has possibly been added to over the last couple of years due to pandemic restrictions and then the easing off of those. Issues such as getting access to and around the Park can be challenging for people with limited public transport options for some area.

accessibility of outdoors spaces, id love to be able to explore the beautiful signed trails

No public slipways.

Littering, amount of car traffic visiting.

Lack of low carbon transport options

**TOILETING, LITTERING AND FIRE LIGHTING**

Traffic issues and litter left by visitors in and around Balloch ,almost every weekend litter found strewn around visitor spots

Increasing tourism, reducing budget.
Transport if trying to not use car. Food.
AS ABOVE DISLIKE WHEN IN THE GARDEN NOISE OF JET SKIS ON THE LOCH. ALSO EXTREMELY ANNOYING WHEN WALKING IN THE AREA.
Minimal public transport - we had family of three fro Ukraine with us and they had no car for some months. DRT been less available since pandemic?
Because the park attracts many tourists, the biggest issue in my opinion is rubbish being left laying around and human waste being deposited amongst the woodlands etc.
See above - the noise from the powered craft that proliferate every weekend completely ruins the good points of the area.
The park appears to show very little interest in the St Fillans area and we are on the boundary of the Perth & Kinross council area and what applies to our nearby neighbours is made more difficult for ourselves due to us being in the park - planning is a prime example where we have to obtain any building warrant from the council , planning permission for a second heat pump , change windows etc
Issue gaining planning permission on our families land. Path work is not great, it's left and no gates or paths are maintaned.
Public transport is terrible means that people are reliant on cars. This is reflected in the overcrowded car parks in places like Ben A'an and Loch Lubnaig. I suggest either running regular shuttle buses to places like this in high season or extending the parking areas for them
People. Parking. Rowdy behaviour. Litter. Large gatherings ruining the space for other people. Inconsiderate and unsafe boats and jet skis in the water - its terrifying and almost always unpliced.
Antisocial behaviour especially in Balloch and Balloch park, littering and congested roads during peak periods.
Poorly thought out visitor facilities. Mass car parks and toilet blocks are not something I want to use or see. How about micro facilities dotted around?

Parking is really bad at certain times of the year.

As above - it is marred by swarms of campervans (domestic transportation is Scotlands number 1 cause of CO2 - and campervans are the highest contributors in addition to being notorious for bringing the entire road network to a standstill) and tourist traffic generally (bringing additional noise and air pollution). Roads congestion is compounded by cyclists using the only roads instead of cycle-paths to the detriment of residents trying to work (often understandably due to lack of clear cycle-path signage and encouragement). Massive litter problem - particularly around bank holidays with residents being left to deal with the majority of the mess. Frequently have to contend with tourists parking in driveway (in a no stopping zone), urinating and dedicating in or around my garden and occasional thefts. The contrast with lockdown during peak COVID highlighted how damaging current visitor arrangements are to nature. We need to find a new way for visitors to all enjoy the National Park without the current disproportionate adverse impact on the environment and unfair burden on residents and others who work in the National Park. In addition to these challenges, we've seeing significant problems caused by the increasing number of holiday home owners in the area (many ostensibly undeclared as second homes) - which has seen our local facilities disappear entirely and has destroyed the local community.

I had some difficulty some years ago trying to get planning permission for a self build affordable home. The planning restrictions meant we would have to sell the house at 80% of its market value despite having taken all the risks in building it. In the end we managed to buy a home which has worked out really well but trying to navigate this particular planning policy at the time was quite challenging.

LLTNPA regulation. Failure to control erosion. Gratuitous notices. Misleading notices ( e.g. NO CAMPING signs when it is regulated camping not no camping)

Being allowed to do sympathetic works to maintain and protect our property. Lack of facilities at Loch Earn and toilets now further restricted

As above, poo everywhere

As you may know, we have been campaigning to persuade the authorities to revisit their decisions on the A82 and A83. We believe these two schemes offer tremendous potential benefits for the park and have been disappointed at the apparent lack of support for our efforts from the park. We are amazed that the park is not showing more imagination, guts and leadership in this area. We also believe the park needs to take a much stronger stance on visitor management issues.

It is a little bit far from the city centre.

Anti-social behaviour during holidays.

Sometimes during the summer months I find the litter to be quite bad. Also there are instances of anti-social behaviour.
Travelling around the area by anything other than a car is really difficult (cycling is not always practical and personally I dislike riding a bike anyway!). Frequently too many people in too few places at peak times and good weather. There are places I just dont go in summer/good weather weekends.
Litter litter litter.

**Question 3: What role can you play in helping to deliver this future?**

Continue to provide outdoor recreation (camping, walking, kayaking, cycling, swimming, SUPs , backwoods etc) for young people.
I serve on the local Community Council so I can help promote these objectives
Do more car sharing with my friends.
Take on advice and listen to people who have been on the loch all there life.
Challenging LLTNPA's incompetence
We can provide a youth voice and a different perspective, as the next generation of people living and working in the National Park.
Pay a charge, if introduced, for using my car to get to the park, especially when travelling alone
Drive local community groups to take responsibility for cycling infrastructure like new paths.
By scrutinising the actions of the national park and ensuring freedoms and rights of access and use of public land are not impinged

<p>Campaign to get jet skis banned on the loch and also show my support for increasing the number of ranger/police patrols</p>
<p>We ( as Junior Rangers and Young Volunteers) have a role to play to help protect the National Park and it's beauty - to help make it more resilient in the future through our jobs, by showing others how to access nature and not make an impact, we can become Ambassadors for the National Park.</p>
<p>I would be happy to provide my role as a volunteer to restore/enhance the park for years to come.</p>
<p>I can volunteer my time perhaps in informing people online or in person about the do, and don'ts. The best places to visit for families, walks, bird watchers play areas etc. How to get the most from their visit in the different seasons.</p>
<p>By keeping up to date with what is going on</p>
<p>As a visitor there is a lot I can do. I can consider using different methods of transport where available, I can contribute to monitoring of land or water quality by reporting things I see whilst visiting.</p>
<p>I think visitors should take more responsibility as they are visiting a protected area if you like.</p>
<p>I can use public transport where possible and continue to respect nature by not littering or doing anything which will disturb the environment. I can share messaging about how to behave in the park on social media.</p>
<p>Let my views be known</p>
<p>Inputting to this consultation.</p>
<p>Provide guidance and support to help improve access</p>
<p>Our Right to Dream ambassadors could be good advocates. There are 10 of them, and 5 are really comfortable in settings where they can use their voice to inform conversations to help ensure deafblind people can access the same quality of living that everyone else has access to. Equality and justice and ways of life are big drivers for them. We could also look at more opportunities to work with the National Park to bring our members here to connect with nature.</p>
<p>I can continue to provide affordable overnight accommodation at Balmaha, although this is financially challenging at present.</p>

Volunteer with RSPB.
Volunteering to be promoted for people who are local
I am a retired filmmaker so could document.
Duke of Edinburgh - Glasgow kids are exposed to the outdoors to educate and respect sharing love of outdoors.
Sharing the Park's views.
Be respectful to nature and surroundings.
More carbon neutral ways to travel as a tourist i.e. electric rental car. Add to the local spot to be part of the local ecosystem.
I can support local community initiatives
A commitment to utilise eco sustainable transport options if made available
Litter pickers at library, businesses etc. Happy to pick on dog walks if equipment can be available.
Transport - I can take public transport options.
Tell more people to travel by bike or EV.
Put communities in charge of what happens in their area. Work together more.
Communication and objections to developments.
Vote against plans to ruin the Park. Be careful so as to not add to issues.

Be more active in the village community and apply greener practices to my business.
Not as a pharmacy.
Provide a business employing people. Volunteer on community things. Could use premises for people who live here.
Be here. Educate on parking.
Former NP board member - no more to give.
Cultural difference.
Continue to be a regular responsible user of the park. If suitable volunteer opportunities came up I would also be a conservation volunteer.
Support local farmers, engage in the local outdoor recreational activities, visit and engage with local nature
Carbon footprint - bringing water bottles.
Hill walking
Could embrace the idea of the NP.
Accessibility - outreach talking to students, getting to kids.
Visiting only. Public transport is hard with baby.
Education and communication. People know their responsibility.

ANYTHING I do will be more productive than ANYTHING you will do or have done
Only a visitor
Continue to use it - support.
Like it the way it is.
More accessible green space/countryside. Not to value by developments - very against Flamingo Land - XXXXXXXX
Better transport is main issue (promote wheelchair accessible destinations). More activities celebrating National Park status - only time it feels alive is when big events are on.
I'm unsure.
Take public transport. Take litter home. Tell other people in the community about the experience here.
Advertising public transport from Glasgow and more representation of other types of people in adverts.
Already try to keep carbon footprint down. Need more transport for stuff. More support from council for businesses.
More cycling and getting bus if it is cheaper and easier for families.
Work with other groups like access trusts to help make sure more disabled people can access the outdoors.
Look after own surroundings, plant trees control INNS. Campaign for restoration of Balloch Castle Country Park. Campaign for better tourism infrastructure particularly waste water disposal.
I hope Im a responsible visitor. Im always happy to pay for car parking,

I can enforce litter fines
To ensure that the repeated views of the local people are actioned and the flamingoland development is once and for all rejected. The proposal is not sustainable nor eco friendly as it will attract many hundreds of staff and customer cars which the applicants have made provisions for in their plans, even though they say these people will be using public transport.
Support any campaign which objects to unsustainable and eco unfriendly projects like the flamingoland development proposal
By educating our community
I can reduce carbon footprint in almost all areas I use the park except transport.
I can continue my volunteer roles to support and lobby for safe, joined up cycling infrastructure connecting communities, and to support sustainable rural communities. I think food and jobs can still be delivered in a nature rich environment. It is not either/or but different, more sustainable food priorities.
promote and support active travel development and shout about how great it is in my employment
Responsible and respectable use of the area. Not supporting big development like flamingo land we don't want it but are being bombarded by companies until people stop protesting and they get their way .
Ensuring the Flamingoland proposed. Development is completely rejected as it is not a sustainable low carbon project. The project meets none of the NPF4 objectives.
Getting involved with different events.

<p>As a Park volunteer I hope to contribute to some of the practical conservation tasks that can deliver on some of the aims and targets set out in the plan. As a volunteer ranger I would hope to be able to play some supporting role in informing visitors about these and hopefully inspiring and educating them in how they can contribute positively through their own behaviours and actions</p>
<p>feedback</p>
<p>I can spend time (and money) in the trossachs rather than other places.</p>
<p>Identifying partners, collaborators and innovators with whom the Park could be engaging to help deliver on its strategic aims and objectives</p>
<p>WORK WITH LOCAL GROUPS IN CONNECTION WITH NP SUPPLYING FEEDBACK ON ACTIONS AND RAISING AREAS FOR CONCERN</p>
<p>Everyone</p>
<p>Behaving responsibly</p>
<p>ENSURE FRIENDLY ATTITUDE TO VISITORS, REMOVE LITTER UNFORTUNATELY LEFT BEHIND.</p>
<p>Litter picking. Influence others.</p>
<p>My garden has been stocked with trees, shrubs, native hedges, wildflowers and a couple of ponds. I feel lucky enough to be able to deliver a healthy national park where nature can thrive.</p>
<p>None</p>
<p>We have already participated in the meetings etc re the Place Plan for St Fillans and have already volunteered to assist with the priorities raised</p>

I am XXXXXXXX bringing Otter talks to the village and soon will be bringing a Squirrel talk from someone in the Saving Scottish Red Squirrels. We are very involved in the area of wild life. XXXXXXXXXXXXXXXXXXXX with the local children. I have a young family, we are all very keen in nature and surrounding.
Support and share appropriate communications, behaviours
I try to walk and cycle more and use the car for essential travel. I believe in leave no trace when walking or cycling. Where possible I support local businesses.
I can use the facilities provided and offer my time volunteering to help keep the area clean and tidy.
Always try and educate on dos and donts about national park.
I can continue to chase off idiots trying to empty their campervan toilets into the stream opposite my home XXXXXXXX
I am part of my local community trust trying to engage with positive change.
Provide views and guidance on facilities and the needs in St Fillans
Both of our organisations have strong track records of delivery relating to aspects of the above areas, particularly in countryside access and visitor management, where we find we can sometimes occupy gaps in provision by the statutory agencies. We look forward to continue to work with the park in these and other fields and hope the park will continue to welcome and facilitate our support.
Reduce carbon footprint.
Be open to changes and possibilities. Stay engaged with proposals and developments. Have conversations and encourage others to communicate their views with the NP .
I can collect litter

**Question 4: Who else do you think needs to be involved?**

Youth Groups (Scouts, Guides etc) and Clubs (Canoe Clubs, Walking Groups, Cycling Clubs etc)

Entire communities
Scottish water need to be involved to reduce the water level, and stop keeping it artificially high and killing so many native trees and damaging the landscape around the loch
We want to see people all the way from the First Minister through to other staff in the Scottish Government being part of this, like the conversations held with Lorna Slater MSP and our member Aidan.
Residents (not including second home owners) and local businesses (small businesses, the larger ones only have profit in mind and hold too much sway already). Scottish Government to give the powers and funding.
Anyone who uses the Loch for powered recreation activities to oppose the anti boating agenda of the national park
Rangers, police
People with a platform - and help other young people have a voice
I think that GGC and WDC as owners and gatekeepers should provide the appropriate funding for ongoing removal of any invasive species, which may cause irreparable damage to the life of the native species of trees in the park. They could also arrange for upgrades of benches and increase the number of bins to accommodate the daily litter, especially in the summer months.
... a forestry concern
The Scottish government of course can help with funding to help maintain the park and all its associated costs. Anyone who can help prevent the destruction of the park in the name of commerce.
People who actually know what they are talking about
Joined up approach between public, third sector and private organisations. I think we all have a part to play in making this area protected.
Politicians, environmentalists, managers of parks in other parts of the world which are doing well.
Everyone

Cycling Scotland
The Draft Plan acknowledges, rightly I suspect, a major challenge presented by the highly fragmented land ownership in the National Park. If anything, the role and power of local authorities is underestimated though.
Need more community consultation beyond the obvious groups.
NP rangers
P
Communities
There are sites which need car parks - create these facilities. Shuttle buses.
Communities that may not be in the park but neighbour it as these urban areas that utilise the park
Any other organisations working and involved with businesses in the National Park area to ensure all are working towards the same end of sustainability, supporting communities and for the best for nature.
Gartmore - good bus service that people can use.
National and local government. Residents take responsibility.
Generational interest - get kids involved in NP objectives.
LESS not more organisations/partners need to be involved The LLTNPA should be disbanded
More policing in Balloch. More activity in the Park and a presence. Never had a chance to get involved in.

More external input
Stirling Council
All Councils. Scottish Water. SEPA. Nature.Scot. Royal Forestry Scotland. Fisheries bodies. Visit Scotland. Scotrail. The LLTNP must treat agencies and landowners with more respect and not always assume that the LLTNP knows best. Schools need to be involved as education is key to understanding and looking after our biodiversity.
Local community must be paramount.
National park wardens
The local people
The local residents
The national park being active with local community groups
Local population and government
disability groups, active travel groups, transport networks
National park authorities to respect public destinations and stop developments not being allowed to continually resubmitted
The local people.
Council etc
The government. More local people and those from areas nearby. Different generations and people of different backgrounds (especially low socio-economic ones).

Stirling Council needs to advocate for & secure increased and improved public transport and housing services as if the area's survival depended on it. It is hypocritical to spout political fuff about empowering local community councils towards "net zero" or whichever new buzzword will trend next, when both middle and upper level government are dropping the ball on the most obvious and urgent issues.

Basically everyone! Lots of organisations- public, private, community and voluntary groups- individuals as people living or working in the area, visiting it. Landowners and farmers.

Transport Scotland, Cycle Scotland, Sustrans, Euans Guide

A representative sample (ages, classes, races, genders) of the public engaged in community policy development - a kind of trossachs parliament of the people - who get given lots of info and asked to feed into decisions for the public at large.

a carefully curated list of people from my network

#### COMMUNITY GOUPS FORMED WITHIN LOCAL AREAS

Police Scotland to enforce the bye laws and give the NPA more power in and around the Loch

Private business needs to be held responsible to aid in monitoring and upkeep.

Environmental organisations, poverty alliance, local communities and businesses and individuals with vision.

#### POLICING OF AREA IF DISPUTES ARISE.

Buchanan Community Council is in abeyance - probs amalgamation with Drymen CC would have been worthwhile.  
Local development group is showing results.

The National Park administration

Police Scotland has failed to deliver any type of community engagement/policing in the area and again being on the boundary of a council area is problematic - Perth & Kinross council should realise their responsibilities do not stop at Comrie and do in fact extend westwards to St Fillans  
Transport Scotland have also failed in respect of speeding restrictions on the A85 - again Comrie is a prime example where they have speed bumps and a 20mph restriction on the A85 but this is seemingly not possible in St Fillans

Company's that could help with things for smaller villages to have more things for the kids. Play park, playing fields. It's not all about visitors. But of course they are important. We do visit alot of other places with in the park.

Local authority, local businesses, community organisations

Local authorities, Government depts and agencies, Scottish Water, Park Authority.

Volunteers to help look after areas in the park that suffer from high visitor numbers, litter or wear on paths etc

Government

Law enforcement. The local Councils.

FLS being one of the largest landowners have a vital role to play.

users - parks authorities seem too autocratic

Perth and Kinross Council

National press and MPs

You need to employ staff who have the imagination and determination to develop, promote and implement the new ideas which will be needed in the future. You need to find ways to get more out of partners like us, F&LS and key local authorities for example.

Everyone!!

National and local government
Really important to have businesses and communities on board, community support is crucial, its great to attract more visitors but residents need to feel that they are high up the priority list.
Park council and public

**Question 5: Are there any barriers we need to overcome to make it happen?**

Lots of obstructions e.g. quality and number of cycle paths , quality of footpaths, camp sites etc. As an example every time a cycle path crosses a trunk road, cyclists (particularly young groups ) need protectione.g traffic lights at Arden where the cycle path to Helensburgh crosses the A83.
The Scottish Government has no idea how to address the issues we locals face, the majority of our elected representatives do not engage with us or support concepts and businesses (like Fish Farms) that we do not want.
Scottish water,
LLTNPA conflating zero emissions with carbon neutral. LLTNPA's obvious incompetence and lack of accountability.
People don't like change and are used to doing things a certain way, and sometimes don't like being told what to do, even if we're doing something for the right reasons.
Where communities are unable to I detss as me the lisbilsnd ownership of structures such as bridges, local organisations like the park and FLS need to stand up and take the load.
The lltnp CEO and senior staff need purged
Addressing the few members of society who will try and rebel against the ban
People

Obviously money is a huge factor in all of this, but it cannot happen without all the locals and the dedicated volunteers.

Yes you actually need to listen to what people have to say and actually engage with them

Strong policies - don't be scared to do something different or bold.

Better support from the government.

Buy in from stakeholders of the park.

Less waffle in policy statements.

Getting the many visitors to respect nature. Stopping people building big money making ventures like theme parks and shopping malls in the area.

Idiots who dont appreciate what we've got

Funding, as ever!

Apart from the above, the Scottish Government will need to recognise that seed funding is essential, eg in the form of subsidies for vital innovations such as waterbus services. Overcoming foot-dragging illustrated by the continued lack of progress with new social housing at Balmaha is another challenge.

Sustainability - want to get young people and retired people.

Information.

Policy requires to be driven by the Scottish Government on preserving NP areas.

People's attitudes to public transport and restrictions around camping

More frequent public transport and more affordable housing for people to be able to retire here.

Active transport and improved public transport
Changing mindsets of people who may consider that nature is not a priority or communities working together for a more greener sustainable future. Environmental education and raising awareness.
Ukrainian refugees. Thoughts for more people.
Being based in Balloch makes it too centralised.
Make the area safer, bring in more investment
The LLTNPA itself Overpaid Unproductive Self protective Unaccountable
More for kids, activities.
Dogs - see previous.
Flamingo Land could be a nightmare but also good to see more stuff coming in.
Better transport, reliable trains, cheap! For families, more things for children in Helensburgh and Balloch.
Lack of funding.
No
Be more transparent. Attend public meetings and CC meetings. Pay more attention to the local voice and less to the Holyrood voice.
There is a tension between zero carbon and building preservation. If money can be found, integrated solar and solar tiles should be commonplace in the LLTNP : even 8n conservation areas. The contribution of exported generation helps off set bills in these challenging houses and economic times.

Employ a litter manager

LLTNP management

this organisation need to apply the following principles when assessing the flamingoland proposal

To conserve and enhance the natural and cultural heritage of the area

To promote the sustainable use of the natural resources of the area

To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public

To promote sustainable social and economic development of the area's communities.

Ensure the LLTNP planning department apply their main aims and objectives when assessing this project.....

To conserve and enhance the natural and cultural heritage of the area

To promote the sustainable use of the natural resources of the area

To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public

To promote sustainable social and economic development of the area's communities.

Working with third sector organisations and funding

Make sure its not turned into a theme park or rich people destination

There seems to be a lack of clear leadership/commitment/coordination which is required to deliver a joined up cycle network. Perhaps a lack of local knowledge/experience of cycle routes and issues.

Physical barriers are slow to be removed, indeed more are appearing.

Not to allow landowners to block improvements - they would not be allowed to stop road developments, why prevent safe cycling and access for disabled people, often along the historic public routes?

Many boundaries by different organisations - LAs, urban/rural, NP etc. which prevents a strategic overview of a cycle network options which are often different from the roads, and need useful public transport connections.

Planners aren't interested in joining up cycle routes, and need to require them.

Bus routes are very inadequate for locals and visitors. The few remaining only connect to urban centres not to neighbouring communities. They also need to link with trains and cycle routes.

A short season particularly for ferries. It would be helpful to provide some strategic connections through the year to support a more consistent service, longer season and support other businesses. The weather here rarely prevents travel.

car culture needs to go

Public opinion that your not listening. Scottish government to stop repeated applications that have been consulted on and rejected.

Lltnp senior management who are for all the wrong reasons supporting the Flamingoland project.

Funding

More funding and more advertising to show how fun it is to go and how easy that is to do.

All parties must be honest about priorities, trusted to be honest about those priorities, and trusted with financial freedom to affect change according to those priorities. Multi-year funding must be made available. Change will have to be landscape-scale and long-term and this cannot be accomplished by diluting the initiatives into bite-sized projects forced into neat artificial parcels to fit the funding calendar.

Definitely the transformation required and envisaged will raise tensions and conflicts of interest and perceptions but ultimately it can only be achieved by seeking to build as much consensus across as many people and groups as possible so that everyone can play their part. There may need to be at times and on some issues some direction and enforcement to move thing along in the right direction and within an appropriate timeframe but this will not necessarily generate the commitment from all the parties needed so has to be used selectively and carefully.

the actual barriers

Lots of vested interests - including business who dont want competition, land owners - who dont want increased access and wealthy locals who dont want more visitors in their back yard.

The public perception of the Park as being negatively different (rather than positively unique) and not integral to, and characteristic of the regional economies in which it operates

BUSINESS NEEDS TO BE MEASURED FOR SUSTAINABILITY. A REGISTER OF "GREEN BUSINESSES" PLANNING POLICY NEEDS TO FAVOUR SUSTAINABLE ENVIRONMENT- IF THIS DOES NOT HAPPEN IN THIS PLACE- WE HAVE NO HOPE OF SUCCESS FOR NATURE, ANYWHERE.  
SALE OF NON NATIVE PLANR SPECIES SHOULD BE BANNED

Policy and funding.

Transport within park. Not transport outside park. There's a train to Ballochvwhich should be better advertised. You'll never get me there by public transport as I live rurally as do most of you neighbours.

No, it should be easily possible to ban powered craft on Loch Earn

Active engagement with the community and agreed action plan with target dates

I guess funding is always an issue, specially now with everything going up. We need more things that will last and not need to be invested in all the time.

Education and understanding; funding; proving theres a business case for doing so

I am concerned about the pressure on Loch Lomond from development and land use. The southern basin has been showing signs of eutrophication for years. It is therefore very important to control man made inputs to the loch and rivers. It concerns me if the park authority has got the balance right between sustainable development and protection of the environment. Other authorities responsible for our sewage infrastructure and traffic management also require investment to upgrade in an appropriate manner to protect the environment.

There needs to be a control over businesses expanding or diversifying if that is detrimental to the quiet and natural beauty of the park. A large pool of holiday chalets or caravans vomited along the shore would destroy the attraction and natural ecosystems of the park for example.

Funding

Urban mentality the the countryside is primarily their playground. Casting visitor access to the National Park as a right instead of a privilege

Better public transport to and within the national park possibly making use of water buses. E.g Difficult to get from Lochgoilhead to Callander without a car.

more openness - better user involvement in policy and decisions

Provide funding for facilities for locals and visitors

Start offering facilities to stop the environmental impact- where does the money you take go, on rangers who drive past the problems????!

Overweening focus on procedure sometimes seems to get in the way of progress causing delay in implementing projects so that important assets like the Luss Visitor Centre can lie empty and unused for years. You also need to be more imaginative and flexible in your approach eg in relation to the Aber bridge where inflexibility over planning and procedure is preventing us delivering a solution.

Policy, funding, resistance to change, communication needs to be improved e.g. I am aware of this consultation only because I volunteer with the Park, as a resident I have had no communication about it.

Do something

**Question 6: Do you have any other suggestions for how we create a more sustainable future for nature, climate and people in the National Park?**

Define sustainable? It is quite possible to live with Climate Change in the West of Scotland with very, very limited (or no) action. Internationally the situation is serious in some locations and we should be acting to protect those communities.

Look at how other countries manage their parks, get learnings from them. Set up panels that involve locals and hold them with regional decision makers. Make our elected officials more accountable and ensure they attend

Increase and improve public transport options - frequent shuttle buses with appropriate storage for outdoor gear between towns and villages. I would pay Â£5 for a day pass on a Trossachs Shuttle bus from a park and ride location quite happily.

Sack the entire board of LLTNPA and senior team, or at least hold them accountable.

Bring the timescales forward! 2030 and 2045 seems like a long way away.

Scottish Government need to embed nature, climate change, biodiversity into the curriculum, ideally as a standalone subject, not just a module as part of geography. This is the only way to 'mainstream' the change in thinking that will be required to make sustainable change that not only people understand and accept but actively want as they recognise the positive impact of a more nature based economy, community and National Park.

Have more regular patrols particularly on peak days

We think this is a massive question to answer.  
We didn't know about the consultation - schools should be involved more with the discussion.

Restore the land before people cut down the trees, then it will help climate change as well.

Stop any more planning applications to build or develop on any part of the park. The park is and should remain for everyone not just business for the few.

Proper bins and timely emptying of bins  
have a presence within the park to prevent people damaging the park and leaving rubbish everywhere if you are have bylaws up hold the bylaws

Realism about what can be achieved. Less pie in the sky. Political window dressing banned.

Part of the parks appeal is that its wild and natural. We need to keep it that way rather than worrying too much about making life convenient for visitors by building more facilities which could be a blot on the landscape.

Im only one get us together

A less modest target for the construction of genuinely affordable housing for the third of the residents who earn less than Â£25k pa is essential. A concrete suggestion I have is for the creation of a park-and-ride near Alexandria or Balloch for those unable to take a train, to connect with a waterbus service at Balloch to take visitors to Balmaha AND Rowardennan.  
I also support the need to accommodate electric vehicle (EV) use.

Stop building on everything.  
Deforestation and redevelopment.

Flooding - need some actual action on this.  
More focus on communities rather than visitors.  
Transport links are poor. Local people are trying to start something but it shouldn't be up to them, should it?  
Funding for renewable energy - lots of people here would be keen but it's not affordable.  
More EV charging points.

<p>Make use of the space - forest schools etc.  More community focused development - fewer second homes and short term lets.  Historically, the main sources of employment have been forestry, retail, tourism, agriculture - that needs to change.</p>
<p>Using public transport.  Promote and retain qualities of the park.</p>
<p>Looking at having a tourism/National Park tax to fund it and focus on tourism giving back local eco.</p>
<p>Unsure of NP's work so can't offer answer.</p>
<p>Less people in the National Park.</p>
<p>As above. We need more regulations around loch use and preservation of the area.</p>
<p>Government and private sector to ensure support from both. Unlikely for all developments to be able to be funded through public or charity purse</p>
<p>Manage visitor numbers.  Affordable housig in Balmaha and Drymen - not happened but would have impacted parking so not seen an increase.  Cycle path and access from Drymen set up by Community Trust.</p>
<p>More buses. Can't get train here but needs more connection.  More accommodation. Ban second homes to be able to build more homes.</p>
<p>Better infrastructure</p>
<p>Moore public transport and encourage more cycling.</p>
<p>Problem with toilets (Drymen) - there are none for visitors.</p>
<p>More information provided to change bad behaviours</p>

Anything that needs built uses national resources from the Park.  
Could be better, local suppliers and businesses.  
Making the most of renewable energy.

Encourage more visitors without cars, which will need better transport and infrastructure.

Maintain it - create accessible parking.

Educate people on how to treat it - start them when they're young.  
Careful about what businesses are in the Park - the bottom line, while important, isn't the most important thing.

Don't allow focus on nature to overtake need for litter, parking and visitor numbers to be managed.

Public transport encouragement.  
No DLT anymore.

Only approve developments that there is infrastructure to support

More affordable housing

More buses

Has to come from the Scottish Government - money for start-ups for businesses and renovations. Park can be a channel for that to help, identifying the Park as benefactors.

Clearer between roles - who does what: local authority or national park?

Education and raising awareness. Working with communities. Creating communities that are proud of their local area. Helping create jobs for communities.

Wasting money on Gaelic signage - more money on things that matter.  
Access for the vulnerable in society.  
Weekly service to get people with mental health services.  
More access for children to learn to come out here.  
Better pay for tourism - rates reduced for businesses so they can attract and retain staff.  
Young people to be able to stay here.  
Unused land that isn't developed for local people.  
Incentivise people to move out.  
Proper debate on climate change.

Nature restoration.  
Bins and limiting impacts for visitors - equipment for visitors to pick litter.  
Not taking public transport.  
Try not to drive.  
Can walk everywhere in Aberfoyle.

Education - go into primary schools to talk about it.

Low carbon sustainable transport.  
Don't use cars.

More National Parks and improved travel links.

Let the lomond banks project go ahead

Not easy to gel multiple types.

Look like the right things.  
Opportunities to recycle.

DISBAND THE LLTPA  
Return the "governance" of area to pre park era

Buses

Really well kept - lucky to have it on our doorstep.

Easier to bring disabled relatives by car.

<p>More needs to be done to encourage responsible dog ownership - dogs on leads/controlled (especially Balloch Park). Only thing that keeps us away.</p>
<p>Less is more.</p>
<p>More green space - less development. More NP engagement with kids - outreach, guided activities with rangers, more about NP in general.</p>
<p>More events, more things for children. Easier to get around by different transport methods, make a day of travelling around using public transport, especially for disabled people and wheelchair users.</p>
<p>Better woodland management.</p>
<p>More public transport, fewer cars.</p>
<p>Clean, good as is.</p>
<p>More green spaces.</p>
<p>Less people coming here. Better transport for residents. Closer working opportunities.</p>
<p>Free buses. Trips for disadvantaged people linking up with National Park businesses.</p>
<p>Prices for activities. Jobs to keep people here.</p>
<p>More bins. Storage lockers for visitors to leave gear/cheaper rentals for bikes.</p>

Regenerate Balloch Castle Country Park, help to provide a Ranger service 365 days within BCC Park. Revitalise the train from Queen Street to Balloch to make it pleasant and safe. Support the idea of a trained train guard on each train qualified in knowledge of the LLTNP welcoming yet firm to deal with the anti social behaviour.

District heating systems at large scale, possible using ground source heat pump boreholes or water source using the lochs.

I think people should be fined for littering

Ensure that Balloch west riverside is a place free for the public to roam and enjoy the beauty of the natural environment without spoiling it with a massive over developed private project which clearly the locals have rejected many times.

More sustainable farming with nature, by promoting venison (culled) and reducing livestock farming thus giving more land back to nature/biodiversity. Thus reducing the problems of livestock emissions, water pollution, over grazing. Increase native berries for food like in Norway who also promote nature very strongly with their visitors and practices. Can the ferries also supply more local goods as well as tourists?

less car culture, more train, bus + bike options

Allow the lltnp board members to interact and listen to the residents here, after all they were voted in by them to promote their views.

Encourage places to fill up water bottles.

One big area for those working and living in the area and for visitors will be a better more integrated transport system that can reduce car dependence or individual car travel as far as practically possible. This might include more use of water based travel options that are not just about cruises but actually more of the practical transport option with better frequency of services, integration with other modes of non car transport such as buses and trains and a pricing and ticketing structure that makes this viable as a public transport option.

get people out of cars and on high quality routes

Invest in enough wind turbines within the park area to make electricity free for all within it - there is the space and wind to do it - excess electric generation could be sold outside to fund it.

From Balloch, it would be amazing if there was a tram system or public boat service that could take people to busy areas such as Duck Bay and Luss to reduce amount of cars.

To not allow any land to be purchased for theme parks etc like the Flamingo Land.

Embed the Park in its regional economic environments - delivering additionality to each of them individually and at the inter-regional scale

WE NEED A HOLISTIC APPROACH. PROVIDE ENCOURAGEMENT AND ALTERNATIVE METHODS FOR AGRICULTURE AND BUSINESS.  
AN EDUCATION PROGRAMME FOR VISITORS NATIONWIDE- TEACHING RESPECT FOR THE ENVIRONMENT (TV CAMPAIGN)

Restrictions on holiday let accommodation in St Fillans so young families who wish to work and live here can apply for a long term let on properties instead the current transient visitors

Showcase positive stories, share similar activities from other locations to normalise and inspire, highlight the impact on small things people dont see or think of

Prevent development creep on green field sites particularly in sensitive environments. More consideration should be given to preserving the beauty of the area as opposed to allowing development in green field areas.

Educate to eradicate littering and other antisocial behaviour.

Strong partnership working between authorities, agencies etc.

Do not over manage people's leisure pursuits. I would not like our park to mirror American and other parks where you have to have permits to walk in the hills etc.

There used to be a rail link to Balloch pier, if that was reinstated it would be environmentally friendly and ship visitors in numbers to and from the park cutting car use provided it was frequent, reliable and clean. A further link to a boat then perhaps a possible link to the railway station at the north end of Loch Lomond may encourage visitors to tour more of the area especially if they can get a circular route to get back to their starting point.

Encourage use of cycle paths through better promotion (and discourage use of main roads when cycle path is available). Provide free sustainable transport through the national park funded by visitor permits / Canadian-style road tolls for all motorists who dont live and/or work in the National Park. More wardens with fining (and impounding) powers - used liberally to deter irresponsible access, littering, unauthorised camping and unauthorised parking.

National parks are first about the natural world - they are not and must not be prime development sites for luxury developers.

Consider environmental impact more when windfarms for example are proposed which blight the environment we live in

The Friends has a strong culture of working with business and I am trying to continue and develop this. In particular I am hoping to build relationships with and between the energy companies who operate in and around the park. I see these companies as key to the delivery of these aims, partly as source of community benefit funding for nature and visitor centered projects, but also of course because it is mainly them who will be delivering the energy revolution so urgently needed. We are living in a different world now and old attitudes to wind farms and pumped storage need to change. I hope the park will adopt a similar approach and work with us on this.

Start by doing

#### Question 7: Any final comments you wish to share?

The draft plan is hopelessly unbalanced. The Plan has to think about the Visitor Experience as this is where action (and planning) is required.

You will have to win over a local population who are sceptical, so unless you make a major effort to demonstrate what you are trying to achieve and get that buy in you will struggle.

LLTNPA incompetence is the biggest danger to LLTNP.

The move to a more nature focused Park is not going to be easy or comfortable but it is the right thing to do.

Oh, and obviously, no to Flamingo land or any other major development in what is supposed to be a protected landscape.

I can find absolutely no evidence anywhere that Jet skis enhance the natural environment. Not only do they leak gasoline products directly into the water, they emit a huge amount of carbon and noise pollution which disturbs both the living animals in the water as well as humans on land. They are usually driven irresponsibly and are a hazard to life as well as to nature. There is no need for them, no benefit to them and they have nothing but a negative impact on the loch and national park. If the lake district can ban them why can't we.

As a regular swimmer/paddleboarder/kayaker on the loch I have seen 1st hand pretty much every time I go out (during the summer particularly) the dangers of these drivers and the disruption they cause. It is only a matter of time before someone gets killed as even with my tow float and bright hat they are so busy making sure their mares are watching them show off they don't pay attention to where they are going. I have nearly been hit by them a couple of times whilst swimming. I actively do not go to Loch Lomond during the summer because of them and I know I am not alone in this. I live very locally so it is a shame not to use my local environment because of these fools but I value my life and frankly don't trust them. The times that I have reported them nothing has been done and often they are being leant out to people other than the registered user...it needs to stop. No way is the park going to be carbon neutral with these flying about.

More e-charging ports for cars.

Please arrange for any upgrades to be made by the owners/gatekeepers to maintain the natural beauty of the park for residents and visitors alike to continue to enjoy it.

I love what you are doing keep it up and stay vigilant , there are many who do not realise the wealth of joy the park gives us all.

Pleas dont make the park a place that is only for the rich

I love living here dont spoil it

Good luck learn from others, work with others, be creative, show leadership and keep focused on delivery: action now!

I am heartened, having read the entire Draft Plan, by the vision for transformation and hope that I and my family can be part of it.

LLTNPA HAVE RUINED THE PARK AND DISCOURAGED ITS USE ON LAND AND WATER - ESPECIALLT BY POORER DEMOGRAPHIS - AN APPALLING ORGANISATION - PUBLISH THAT COMMENT TO PROVE YOU ARE NOT ONE SIDED

Return Planning to Local Authorities.

The standard and application of those members of the LLTNP planning committee has resulted in some extremely poor decisions not worthy of a National Park not putting the environment first.

For heaven sakes, limit speeds on watercraft on the lochs.

Why dont people get fined for littering

The LLTNP management has commissioned a large number of Strategic Tourism Design Infrastructure Development Studies (STID).

I would like the LLTNP management to answer the following questions

why hasnt a STID been done for Balloch?

and

when will one be done for Balloch?

**THE WEST LOCH LOMOND STID**

Exhaustive studies have been carried out in: Inveruglas, Tarbert, ART (Arrochar and Tarbert Station), Arrochar, Arrochar West, Ardgarten, Firkin Point, Ross Park, Luss and Duck Bay.

There are 89 pages in this study outlining the needs of residents and tourists alike, parking, open space, Loch access, picnic facilities etc. etc.

**BUT NOT DONE FOR BALLOCH!**

LLTNP has commissioned a large number of Strategic Tourism Design Infrastructure Development Studies (STID) for west Loch Lomond see below.

My questions for the LLTNP management are.....

Why hasnt one been done for Balloch?

and

When will one be done?

**THE WEST LOCH LOMOND STID.**

Exhaustive studies have been carried out in: Inveruglas, Tarbert, ART (Arrochar and Tarbert Station), Arrochar, Arrochar West, Ardgarten, Firkin Point, Ross Park, Luss and Duck Bay.

There are 89 pages in this study outlining the needs of residents and tourists alike, parking, open space, Loch access, picnic facilities etc. etc.

**BUT NOT DONE FOR BALLOCH!**

Invite/fund businesses to provide strategic ferry services and linked buses.

And to encourage packages for day trips and holidays, round trips, or going through the Park. Appealing to all abilities, mixed groups or just providing transport options for the more enterprising.

Ensure that the ltnp management do not allow the west side of Balloch to be overrun with a private development which will restrict the access of the people to that place.

This will be a major challenge with the Park able to do so much to influence things, but it is imperative that these kinds of changes are promoted and encouraged as we see the urgency of the situation in terms of climate changes and loss of nature and biodiversity

Be more radical. The plan is glossy and fancy looking but quite conservative and unadventurous. Be bolder!

I'll be in touch! LoL

WE HAVE TO MAKE PEOPLE CARE.

More rangers and education training

We love living here but feel badly let down by the park over the past few years and in particular when COVID started we feel ignored

I believe in sustainable development. However in areas of natural beauty the balance should always be in favour of nature and preserving the natural beauty of the area for future generations and not in favour of those who would exploit the beauty of the area for their own financial gain.

The park should remain open for all, no English style no trespassing areas or bulls in fields deliberately to stop people accessing areas. A well publicised code of behaviour for visitors, locals and landowners made known and enforced.

An amazing place which has been noticeably declining through damaging irresponsible tourism and increasing numbers of holiday homes / second homes (with massively inconsistent planning laws application) - action is urgently required. We need to fix it before its too late.

It's about time proper investment and facilities were provided to Loch Earn which is forgotten about and facilities are just worsening

Loch Lomond is a special place but managed badly and those of us who live here see it deteriorate every year. A fee photos on the Twitter feed of the reality needs to start happening and will do. It needs to stop

Assisted by your staff and Loch Lomond Leisure, The Friends recently held a Make a Difference Day litter picking on 3 of the islands off Luss which are the most popular for picnicking and camping. I am delighted to report there was much less litter than we found during a similar exercise about 10 years ago, so it seems the public is getting the message. Keep up the good work!

It's not rocket science

## Section 5 – Interactive Mapping

Description of Area	How does this location make you feel?	Tell Us about your experiences in this location	What would you like to see change in this location?
Trossachs	<b>Mostly negative</b>	A national park should be about preserving nature not promoting more and more visitors. Far too busy especially with campervans taking up majority of spaces in lochside car parks who bring nothing to the local community. Constant stream of cars and far too loud motorcycles racing on the roads when the only sounds you should hear should be nature. And don't even start me on the coaches on the narrow roads and also bring nothing.	More nature, less people
Carrick farm	<b>Mostly positive</b>	Beautiful meadow	Not suitable as a motor home / campsite.
Forest drives.	<b>Positive</b>	Over all very good. Ongoing problem with rubbish and damage.	I would love to see more forest access for vehicular like to corsets drives to allow people to get further into the forest and allow for more camping and roof top camping this would allow people to spread out and not over crowed any one location. Increase in the number of wardens to help patrol the area.
South Loch Lomond	<b>Mostly negative</b>	A good few years ago I attended a fireworks display at the shores with my family . Although the display was excellent the distress from the animals whose	Blanket fireworks ban throughout the National Park

		home it is ,was the everlasting memory .	
Southern Argyle and Bute	<b>Positive</b>	I barely knew anything about this area and was visiting last week and was amazed to discover that LLTNPA stretches that far West. It annoyed me that people just think of East Loch Lomond as 'the National Park' and think visitor numbers could be managed if people knew about the wider NPA area.	While not wanting to damage the area through increased visitor numbers but more publicity (targeted at those already using Millarachy/Balmaha/Rowardennan to discover other, less known areas.
Strathard	<b>Positive</b>	Great communities, willing to be involved in improving the experience for everyone.	Better transport solutions such as shuttle bus incl bikes from Aberfoyle to Stronie/Inversnaid. Return of the Trossachs Trundler to include bikes. Enforce public bus service from Glasgow and Stirling such as first bus to carry up to 5 full sized bikes
The whole of Loch Lomond	<b>Neutral</b>	At present it's satisfactory... It used to be much better before LLTNP started unelected meddling	The eradication of LLTNP who are an unelected quango
Millarochy bay	<b>Negative</b>	Illegal signs posted prohibiting the hand launching of small boats with motorised propulsion both electric and internal combustion. Aggressive and Confrontational rangers who don't know the laws	A restoration to a boat launching site and education of ill informed rangers. Part of the aims of the LLTNP was to improve access to the water for everyone. What they have done here is completely opposite to those aims

Port of Menteith	<b>Mostly negative</b>	This is an entry point into the National Park but there is no welcome	Welcome signage, information and interpretation, improved public transport, re-opening of Inchmahome Priory, path connections to Aberfoyle and Callander
A82 between Tarbet and Inverarara	<b>Negative</b>	Busy and dangerous for cyclists and walkers with minimal parking	The investment going to try and make the existing road tolerable should instead be spent on a new road above the railway leaving the shoreside to cyclists, walkers and those wanting to use the Loch for recreation and holidays.
Arden Roundabout	<b>Negative</b>	XXXXXXXXXXXXX For reasons unknown there is no bus stop at the Lay-By going north although it would be an interchange. It would also provide a link to the Inchmurrin ferry for those coming from the south.	Bus Stop
Arden Roundabout	<b>Negative</b>	Try crossing the A82 with a group of young cyclists using the cycle path to Helensburgh	Pedestrian/Cyclepath Lights
Need a better cycle path link between NCN7, Golden Larches and Balquidder Braes holiday park. There used to be a continuous path.	<b>Negative</b>	A year or two ago I found it difficult to access through an awkward gate, rough steps and poor surfaces, when a few years ago I recall a continuous path to cycle to Golden Larches for lunch.	I suggest a continuous accessible path should be reinstated.

Loch Lomondside Cycle Path	<b>Mostly negative</b>	<p>This route should be the jewel in the Crown of the National Park Active Travel Programme. It is not. It is neglected, badly surfaced and in some areas downright dangerous (Particularly the stretch between Firkin Point and Tarbet, on a narrow pavement with fast moving traffic in close proximity. The path surface south of Luss is mostly atrocious with a section through trees which is actually quite challenging to cycle through. The use of the old road at Duck Bay should be fine, but there is a lot of vehicle traffic in this area and the Cycle path should be re-routed away.</p>	<p>1 Urgent need to resurface the path as far as Luss  2 Resurface and add barrier protection on the stretch between Firkin Point and Tarbet  4 Carry out general maintenance. Urgent need to cut back on undergrowth, sweep the path surface and attend to drainage.</p>
Loch Lomond ferries	<b>Neutral</b>	<p>Wonderful way to travel with a bike and enjoy the views from the water. But very seasonal and infrequent to include in holiday plans. Just not a coordinated service to use for regular crossings. Other services seasonal and unable to rely on in advance.</p>	<p>Would like to see regular ferries, buses, train put in day trip and holiday packages to support walking, cycling in and across the Park - through Scotland.</p>
the old railway line between Aberfoyle and Buchlyvie across Flanders Moss	<b>Negative</b>	<p>This is a beautiful traffic free level, direct old railway line between Aberfoyle and Buchlyvie, but the</p>	<p>A decent all weather surface would enable local commuting and access to services such as the medical centre which has closed in</p>

		surface is terrible - mainly large loose gravel but with some mud, and has wrecked my friends bike - after he tried to commute or go to events in Callander.	Aberfoyle, and a bus service in Buchlyvie.
500 metres of A811 at Kilmarnock church between old railway line through Buchanan estate and road to Croftamie	<b>Negative</b>	This small section of busy road needs an off-road path to enable locals and visitors to walk/cycle to Kilmarnock church and to Balmaha from Croftamie/NCN7 and John Muir Way through the Buchanan estate. The church is being preserved and repurposed by the community for multi events.	An off-road path by A811 between Croftamie road and the old railway, by Kilmarnock church.
Safe cycle access to/from Crianlarich train station from both Loch Lomond and Killin/Glen Ogle	<b>Negative</b>	The A85 and A82 are not safe to cycle - both are missing links to the National Park and require off-road cycle paths to enable local and visitors to use the Crianlarich Caledonia sleeper and bike trains to Oban/Fort William	SSE have a forthcoming mitigation cycle project along Glen Dochart and should be required to provide good quality off-road links to Killin and Glen Ogle from Crianlarich station, ideally using the old railway line where possible. Also a safe cycle link is needed south to Loch Lomond, extending the current cycle path between Balloch and Tarbert.
Between Crianlarich and Killin and Glen Glen Ogle - the old railway line	<b>Negative</b>	Cyclists have been killed on the A85 trying to get to/from the London sleeper, and bike train to Fort William at Crianlarich, and to popular promoted cycle routes, eg NCN7 Lochs and Glens, the Badger Divide	SSE have a forthcoming mitigation cycle path project in Glen Dochart - so a good quality path between Crianlarich, Killin and Glen Ogle is required. It would then connect with the bike train to Fort William and sleeper to London, and connect with local nationally promoted routes - NCN7 and

			Badger Divide. It has been discussed for many years and this opportunity to deliver must not be missed.
National Cycle route 7 between Glen Ogle and Killin	<b>Negative</b>	From Glen Ogle to Killin the tarmac forest path deteriorates into about a mile or so of narrow muddy track ruts and loose gravel. I met sad families giving up.	A good surface between Glen Ogle and Killin suitable for all ages and abilities. Bikes can be hired in Killin. Nearby SSE have a forthcoming cycle track project in Glen Dochart - a good quality path between Crianlarich Killin and Glen Ogle is required. It would connect with the bike train to Fort William and sleeper to London, and has been discussed for many years. This opportunity must not be missed.
National cycle route 7 south of Strathyre	<b>Negative</b>	The steep bends of loose gravel and poor sightlines are impossible for many to cycle up especially older or disabled e-bikers, and has created falls going downhill. A better surface and mitigated gradient is essential here. The position is between the popular Forest family cabins and Strathyre. There is no reasonable alternative - the busy A84.	A better surface and mitigated gradient would improve accessibility for all ages and abilities not just the fittest.

Balloch West of the river.	<b>Negative</b>	In short, a slum. The main street with utterly sub standard businesses in unmaintained eyesore building and a desolate public realm. This is not acceptable in the Capital of the Park. I believe the Lomond Park Hotel may become flats. I assume standard speculative house aesthetics will nit be permitted. The virber shop, B and B and chip shop are up for sale. A building which will scrub up well. The station approach is a disgrace. Thecremediated railway yard which us the West River Bank must be developed in accordance with its zoning. I have made sure that the correct history of this land us now in the public domain so there are no excuses. Thus d3velopmentwill transform Balloch.	Bring in a a full design guide for Balloch.
	<b>Negative</b>	Lots of narrow cattle grids along the cycle way prevent usage	space for me to fit through access points properly
cycle track	<b>Neutral</b>	Bridge too narrow and preventing lots of users	wider bridge
No public access to Loch Lomond anymore.	<b>Negative</b>		A public slipway.

Roadside Loch Earn - North AND South	<b>Negative</b>	I drive the A85 along the north side every day to get to work. The laybys and road verges are constantly rammed with cars, vans, some campervans and some caravans. I don't think this is acceptable. There are tiny signs about the camping zone, easily missed because one sign in a huge layby is easily hidden by the vehicles parked up. I have no issue with self-contained vehicles but where do all the cars and tents put their toilet waste. There are too many people in a small space.	Look into what they do in New Zealand and learn from them. Roadside camping is not wild camping. Roadside camping should be banned. Put more bins out (its great the bin men collect the rubbish). Put more toilets out. But more than this, look for a landowner on the loch frontage or nearby and create more dedicated campsites. And then limit camping to those location. Ban ALL roadside camping in the entire park. Create more campsites and make them affordable. Get more rangers and give them powers to fine people camped in the wrong place.
St F illans	<b>Mostly positive</b>	We need the public toilets up graded and	
Balloch park - playpark area by the water	<b>Neutral</b>	I live locally in Balloch and actively avoid the park during the busy months, if we rarely did go we'd go in the morning/before lunch. It feels dangerous with all the people who come down on the trains to get drunk or start fights. So even though this park is a short walk from our home, I drive my child to and from other parks like Christie park or Levensgrove park because they feel safer and less rowdy. It's also ashame the small business that	A permanent ranger or community police officer situated down by the playpark to control rowdy/drank people. The slipway cafe rented out to a local business person to sell cafe food/ice creams for kids.

		was in the slipway cafe building has closed and no new tenant has been found, it'd be nice to have access to ice creams and toilets down by the play park like pre-covid.	
Callander	<b>Positive</b>	We have recently relocated to Callander and feel it has so much to offer. Lots of lovely walks, cycles, fabulous village, community involvement in lots of different areas	One specific eyesore building on the Main Street of Callander. Appears to have restoration works commenced but now lying there with no indication of work progressing. Not ideal for visitors to the area
Aberfoyle	<b>Negative</b>	Poor food & limited facilities. One good shop selling quality products.	More shops, better & healthier food & drink establishments.
East side of loch Lomond, balmaha - rowardennan	<b>Mostly positive</b>	Mostly accessible by car. Busy hot spots, lots of beauty.	Options for a bus system to shuttle up and down from balmaha/drymen - rowardennan. Ebike rental, (like Boris bikes) park and ride from balmaha, cycle up the side of the loch. Better integrated signage early on for car park status, for instance driving all the way to rowardwnnnan to find it's full and having little other options when you get there. An electronic sign in balmaha with spaces available would be helpful in not making unnecessary journeys up the loch side.

deer numbers	<b>Mostly negative</b>	Hills of Glen Dochart denuded by deer, a landscape under extreme pressure from grazing	sustainable deer management
Arrochar	<b>Negative</b>	Litter is horrible and upsets me. The houses do not feel like they fit in with the village	More action to tackle litter upstream to prevent it collecting on the shore.
Lochearnhead visitor gateway	<b>Mostly negative</b>	lack of connection between NCN7, Lochearnhead village and onwards to St Fillans and the wider cycling network at Comrie and Crieff	a segregated cycle path connecting NCN, Lochearnhead to Comrie
Rowardennan	<b>Mostly positive</b>	Beautiful place but only accesible by car	Public transport link for non-drivers like me. Public transport over the whole park is woefully inadequate resulting in too many cars
good	<b>Neutral</b>	good	nothing
Loch Lomond National Nature Reserve	<b>Neutral</b>	Too much focus on generating tourism income and visitor numbers means that this very special and highly designated place is at risk of being overwhelmed by short term thinking on behalf of the RSPB.  It is sad to see people being directed towards an area that should be protected at all costs.	Unreasonable development in the form of visitor centre and car parking should be stopped at all costs.
Whole of Loch Lomond	<b>Positive</b>	Some really beautiful locations, make me feel proud and grateful to live here but it is often spoilt by the inconsiderate	More focus and educating on acting responsibly and possibly restrictions on access in areas where you are trying to restore.

		actions of a few people.	
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## **Section 6 – Full Survey Responses**

### **RESPONDENT 1**

#### **Individual Response**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Trees
- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a Landscape Scale

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Engaging Communities in Land Use Decisions

**What role can you play in delivering these objectives or actions?**

Encourage native tree planting by individuals and landowners. Focus on community relationships with FLS and other landowners E.g. establishment of Land Use forum. Continue litter picking initiatives. Inclusion of waste disposal/reduction initiatives in our local plan plan. Support projects to rewild River Goil.

**Are there any challenges or barriers we need to overcome to help you do this?**

Funding Reducing risks communities have to take when they run projects Helping us work with landowners Simple but hard hitting messages to educate visitors, we don't want to spoil their trip but it's an opportunity to get key messages across for them to take back to their own communities.

**How can you help us to measure them?**

Need to make it easy for individuals so they can incorporate it into their regular activities. Perhaps an app?

**Do you have any comments on the policies for Restoring Nature?**

Agree with them in principle. They are challenging, but need to be. I think we need to help some of our elected politicians, local and national, to understand the urgency - they are still trying to protect jobs in traditional industries and support out of date practices and not seizing on the opportunities restoring nature could bring. Possibly being lobbied hard by some industries but best not print that!

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Forestry & Land Scotland
- Scottish Water
- Scottish Environment Protection Agency
- Scottish Forestry
- NatureScot
- Scottish Government
- NFU Scotland
- Environmental NGOs & charities
- Deer Management Groups
- Scottish Land & Estates
- Private land managers & their agents
- Local communities & rural businesses
- Rural skills training providers
- UK National Parks Partnerships
- Private finance agencies & brokers
-

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy
- Inspiring Action for Nature and Climate

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Recreational Path Network

**Do you have any comments on these proposed measures or any other suggestions?**

Agree with reducing car travel but such a challenge given the terrain, weather and the entitlement of some visitors. Think the shuttle bus proposals are good..

**How can you help us to measure them?**

Again, need to make it easy for people to do this.

**Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?**

You mention education - not sure how much capacity our outdoor education have for inspiring some of their clients, sometimes from the outside, it looks like they're just trying to keep them distracted, maybe specific training/resources would help.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- NatureScot
- Education & volunteering providers
- Tourism, hospitality, leisure & recreation businesses
- National Park Destination Group
- Transport Scotland
- Police Scotland
- Forestry & Land Scotland
- Sustrans
- Local Authorities
- Loch Lomond & The Trossachs Countryside Trust
- Scottish Water
- VisitScotland
- Scottish Enterprise
- ScotRail
- Community organisations
- Landowners & managers

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Low Carbon Local Living
- Increasing Resilience to the Changing Climate

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Inspiring Action for Nature and Climate
- Sustainable Visitor Economy

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Recreational Path Network
- Partnership Approach to Visitor Management

**What role can you play in delivering these objectives or actions?**

Our community trust has created and maintains a low level path network enabling people to connect with nature.

**Do you have any comments on these proposed measures or any other suggestions?**

Community housing schemes to support recruitment for local businesses - we have had instances of economically inactive people with complex needs being rehoused in our limited social housing while working people have been at risk of being homeless.

## **RESPONDENT 2**

### **Individual Response**

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Diversity and Inclusion

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- A Wellbeing Economy

## **RESPONDENT 3**

### **Individual Response**

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Nature-First Approach to Development



## **RESPONDENT 5**

### **Individual Response**

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy

## **RESPONDENT 6**

### **Individual Response**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Water
- Trees
- Peatland

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Improved monitoring of changes in nature

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a landscape scale

## **RESPONDENT 7**

### **Individual Response**

**Which of the objectives on connecting everyone with nature can you or your organisation help to deliver?**

- Sustainable visitor economy

**Which Delivery Partners do you think have the biggest role to play in creating a sustainable, low carbon destination?**

- Local authorities
- Forestry and Land Scotland
- Transport Scotland
- National Park Destination Group
- NatureScot
- Tourism

**Which of the objectives on enabling a greener economy can you or your organisation help to deliver?**

- A wellbeing economy

## **RESPONDENT 8**

### **Strathfillan Community Development Trust**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Trees

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Improved Monitoring of Changes in Nature
- Land Managed Primarily for Nature Restoration
- Reduce Grazing Animal Pressures

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Engaging Communities in Land Use Decisions
- Green Jobs, Skills and Business Opportunities

**What role can you play in delivering these objectives or actions?**

We own c100ha of community woodland, which we manage for conservation and recreation. This woodland is a mix of former conifer plantation and c25 year old native woodland planting, with a small area of rough grazing. We would be keen to help increase woodland cover and improve biodiversity through reducing grazing pressures, and removing older conifer plantation and replacing with native woodlands. we could also provide a corridor to join up local remnants of the Caledonian Forest. Our woodland can also be used for skills training and supporting young people and volunteers. We are a local community group with links to local landowners, farmers and small holdings, and could actively support community engagement with local land management.

**Are there any challenges or barriers we need to overcome to help you do this?**

Money and capacity! As with all community groups. Recently, we have been lucky enough to employ a part-time, local woodland officer, which has been fantastic. But apart from that we rely on community volunteers, which is not easy. Some of the larger scale works we would like to do are made more difficult through lack of funding. Practical, advisory and financial support would always be useful.

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

A suite of accessible educational resources on Restoring Nature for communities would be fantastic - something easy to understand for the lay person, which local charities and community groups can distribute. Resources that would explain what it means (as everyone panics about wolves!), why it's needed, what the results could be, and what would happen if we don't.

**Do you have any comments on the policies for Restoring Nature?**

I am very pleased to see your policies around Ethical Green Finance, especially not investing in companies that derive income from fossil fuels etc. I am also heartened to see you have included public/community benefits from green finance, and that communities are engaged in land use decisions. I would hope that as well as a consultation process, that community views and suggestions will be taken seriously and included where appropriate, and that it does not become a tick-box exercise to get projects through.

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Scottish Government
- NatureScot
- Forestry & Land Scotland
- Scottish Environment Protection Agency
- Deer Management Groups
- Scottish Land & Estates
- Scottish Water
- NFU Scotland
- Environmental NGOs & charities
- Private land managers & their agents
- Local communities & rural businesses
- UK National Parks Partnerships
- Private finance agencies & brokers
- Rural skills training providers
- Scottish Forestry

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy
- Inspiring Action for Nature and Climate

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Recreational Path Network
- Partnership Approach to Visitor Management
- Multi-year Place Programme

**Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?**

- Whole System Approach

**What role can you play in delivering these objectives or actions?**

We would be able to work with local businesses to support sustainable tourism in the area - we already have close relationships with local businesses. Through Wild Strathfillan we could easily be a place (community woodland) where we could support outdoor learning and nature education in the Park. We have close relationships with local schools and would be happy to support schools/colleges from further away to learn about the Park. I am sure we could support other interested landowners or volunteers to expand this. We are in the process of exploring purchasing community land in Tyndrum to develop visitor and community facilities, including parking, toilets, chemical waste disposal, and a community hub. We could envision this being part of a Multi-year Place Programme. We are looking to deliver the remainder of the Tyndrum to Killin Cycle Path, which would improve active travel options across the park, provide a low-carbon option, and will join up major travel routes,

such as the NCR7 at Killin and Glen Ogle with the Highland Railway line at Tyndrum and Crianlarich. This year, for the third year, we have secured funding and employed seasonal rangers for the Strathfillan area. This has made a big difference to our area, and really helped towards mitigating our visitor management issues - especially with littering and antisocial behaviours. We already work closely with the Park's Ranger Team, but would be interested in the future in supporting training for volunteer rangers, or working with the Park more closely.

**Are there any challenges or barriers we need to overcome to help you do this?**

Our capacity is always an issue, which often means we are not taken seriously. More support from organisations and authorities to help secure permission and funding to take forward some of those projects would help. Advice on legalities and practicalities would also be good. And importantly, more partnership working, there are many areas of crossover between community and Park ambitions, more than I think either side realise. Better communications between the Park and communities, and more willingness to work together would help with this.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

More support for developing long-distance active travel routes, which would bring local and regional communities together, and encourage the reduction in car use, both locally and from a visitor standpoint.

**Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?**

I am generally happy with all the policies. I do wonder whether there needs to be more in the first policy of sustainable visitor experiences, about the provision of infrastructure and facilities that support visitor numbers - namely issues with the lack of public toilets and waste facilities and parking. We cannot keep encouraging people to come to the Park but not provide the basics to keep the place clean and attractive. This is probably the largest community bug-bear.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- NatureScot
- Green health partnerships
- Education & volunteering providers
- Representative bodies and those with a lived experience of barriers to engaging with the National Park
- Scottish Government outdoor learning group partners
- National Park Destination Group
- Tourism, hospitality, leisure & recreation businesses
- Transport Scotland
- Police Scotland
- Forestry & Land Scotland
- Sustrans
- West Highland Way Partnership
- Local Authorities
- Loch Lomond & The Trossachs Countryside Trust
- Scottish Water
- VisitScotland
- Business Energy Scotland
- ScotRail
- Scottish Enterprise
- Community organisations
- Landowners & managers

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy
- Low Carbon Businesses
- A Wellbeing Economy
- Inclusion & Learning Opportunities

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Low Carbon Local Living
- Increasing Resilience to the Changing Climate
- Addressing Housing Needs
- Rural Transport & Active Travel

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Identifying Development Needs and Opportunities
- Nature-First Approach to Development
- Delivering Positive Local Outcomes
- Making the Best Use of Land and Assets

**What role can you play in delivering these objectives or actions?**

Being the main community group in the area with a focus on supporting sustainable community development, we are in the best position to be involved in the delivery of most/all these objectives and actions.

**Are there any challenges or barriers we need to overcome to help you do this?**

As with all community development delivery, capacity, numbers and money are our biggest issues. As mentioned previously: more partnership working between multiple stakeholders, including communities, landowners, authorities etc; more practical and advisory support; support to help secure permissions and funding; and generally more financial support via the Park to deliver important objectives.

**Do you have any comments on these proposed measures or any other suggestions?**

Generally fine. Perhaps, like you have in the destination section, a measure that includes connectedness to nature/feel included in decision making.

**How can you help us to measure them?**

Community groups could help by undertaking short annual surveys or consultations, either formally or informally.

**Do you have any comments on these proposed measures or any other suggestions?**

I understand that you will be focused on the 'honey pot' areas, as that is where the majority of visitors go and the population lives, but please don't forget about the hinterland of the Park. There needs to be an equity in access to facilities and in managing visitors. Even just providing support to communities for seasonal, small-scale improvements, such as a couple of chemical toilets in popular village car parks, or a temporary recycling bin, could make a big difference to more peripheral Park communities.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Skills Development Scotland
- Scotland's Rural College (SRUC)
- Colleges & Education Providers
- Scottish Government
- Community organisations
- National Park Youth Committee
- NatureScot
- Forestry & Land Scotland
- Police Scotland
- Scottish Forestry
- NFU Scotland
- Scottish Land & Estates

- Scottish Enterprise
- Highlands & Islands Enterprise
- Landowners, land managers & agents
- Transport Scotland
- Scottish Communities Climate Action Network (SCCAN)
- Development Trust Association Scotland (DTAS)
- Housing Providers
- Loch Lomond & The Trossachs Countryside Trust
- Community Land Scotland, local Third Sector Interfaces - ie SVE, Argyll and Bute TSI etc.

## **RESPONDENT 9**

### **SPT**

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Visitor Hubs

**Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?**

- Whole System Approach
- Incentivising Sustainable Travel Choices
- Developing a Rural Transport Sector

**What role can you play in delivering these objectives or actions?**

SPT is the Regional Transport Partnership for the west of Scotland and its area includes West Dunbartonshire and the Helensburgh & Lomond area which encompasses part of the National Park. Among its responsibilities SPT has a statutory obligation to prepare and deliver a Regional Transport Strategy. SPT has prepared a new draft Regional Transport Strategy that has been approved by SPT's Partnership Board and is currently pending Ministerial approval. The new Strategy sets out policies covering the transport network for the west of Scotland including policies on sustainable travel and ensuring effective transport for rural areas. These policies will help support the policies set out in the Plan. Policies in the RTS on Connecting Places aim to set out the full range of connectivity requirements for the region on a spatial

basis, reflecting the region's need for strong international connections as well as good links both within Strathclyde and to neighbouring parts of Scotland and beyond. The policies do not describe the specific interventions required to improve connectivity, but provide a framework for future appraisal, modal strategies and the application of national policies (e.g. Strategic Transport Projects Review 2) within the region. The policies are developed from the spatial and economic development and investment priorities set out in the National Planning Framework 4 and the four indicative Regional Spatial Strategies covering the SPT region – Argyll and Bute, Ayrshire and Arran, Glasgow City Region and Loch Lomond and Trossachs National Park. In addition, policy 47 of the RTS relates to Connections between Strathclyde and other Scottish regions where the intention is to improve, increase and enhance sustainable inter-regional connectivity of the region for passenger and freight transport and ensure the transport system enables a sustainable, competitive, resilient and productive regional economy. The region's inter-regional transport gateways and routes to be maintained, improved or enhanced include connectivity to Loch Lomond and Trossachs National Park. The corridor between Glasgow - Bearsden - Milngavie - Strathblane / Stirlingshire / Loch Lomond & the Trossachs National Park is specifically noted as a strategic corridor within the RTS. SPT is working with Transport Scotland and Glasgow City Council to progress delivery of the Clyde Metro. The Clyde Metro is a recommendation of the STPR2 for a modern, integrated mass transit system for the Glasgow conurbation. The Clyde Metro is likely to require a change in transport governance in the region to ensure an efficient and integrated network of public transport services. Clyde Metro, when delivered, will help facilitate a whole journey modal shift for travel to the LLTNP from the SPT region including trips via Glasgow Airport. SPT has also initiated work on the Strathclyde Regional Bus Strategy (SRBS). The SRBS process, among other matters, will investigate bus reform options (including franchising) to determine the best bus governance model to support SPT's strategic targets and objectives, including reduction in car travel, modal shift to more sustainable transport, and improving access for all through more affordable, accessible, available and safe public transport. The SRBS process will also set out a new bus network plan for the region including coverage for rural areas and the integration of local bus services and the Clyde Metro mass transit network. With regards the specific objective and actions SPT supports the proposal to develop a hierarchy of well-defined visitor hubs. In particular, it is helpful to have Balloch and Arrochar/Tarbet identified as key hubs as these locations already have a good mix of sustainable transport options from the central belt that can be built upon to achieve a modal shift for the whole journey to/from/around the LLTNP. SPT's role in delivering the Visitor Hubs may include providing capital funding to our local authority partners for active travel and public transport infrastructure, funding and managing the provision of real time passenger information, integrated ticketing, engaging with transport operators, bus network planning, provision of socially necessary bus and DRT services, funding Community Transport services.

#### **Are there any challenges or barriers we need to overcome to help you do this?**

We welcome ongoing dialogue with LLTNP as we prepare the Regional Transport Strategy Delivery Plan. We would also welcome the opportunity to discuss the emerging Regional Active Travel Strategy and Regional Active Travel Network currently under preparation by SPT and the potential opportunities this can help unlock to improve active travel to from and through the National Park. Further detail on the Strategy and Network can be found in our in our response to the question relating to support for the objectives and actions associated with the Creating a Sustainable, Low-Carbon Destination theme. Under the Plan's objective 'Developing a Rural Transport Sector', we note your commitment to address opportunities to meet sustainable travel demands and to work with business and transport partners to grow demand. We would very much welcome further engagement with LLTNP to explore how best we can support this objective. The Plan's aspiration to develop a rural transport network to encourage more sustainable access to the park and reduce car journeys is very welcome. As you note in the Plan it will be essential to undertake a detailed analysis of market demand to establish the scale and nature of the response required. This will be helpful to SPT as we work

together to consider options that both meet the needs of visitors to the Park but also the everyday travel needs of local communities and those who commute to and from the Park.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

With regards the Whole System Approach objective, the actions should recognise, reflect and align with existing local and regional transport and active travel strategies that border and cover the Park area. As above, we would welcome dialogue in relation to the emerging Plan and Regional Transport Strategy and RTS Delivery Plan and Regional Active Travel Strategy and Network Plan to help reflect and align these with the objectives set out in the Plan.

**Do you have any comments on these proposed measures or any other suggestions?**

The measure of success for “Low-Carbon Travel for Everyone” should go further than “Track private car usage to and within the National Park”. The modal split of travel to and within the park should be considered as this would help understand the success of different initiatives. The connectedness and accessibility of Priority Areas, Priority Locations and Visitor Hubs could also be key measure.

**How can you help us to measure them?**

SPT can provide some public transport data to help monitor actions and objectives.

**Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?**

SPT supports these policies and welcomes the focus on improving sustainable transport/travel options and addressing car use. We suggest that the word “increases” could be deleted from the sustainable travel thematic policy, as this suggests that the Plan addresses future increases in car use instead of addressing current use levels. Alternatively, you could commit to reducing private car use as is suggested in the Measures of Success.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Regional Transport Partnerships – SPT, Hitrans, Tactran. Bus and coach operators.

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Rural Transport & Active Travel

**What role can you play in delivering these objectives or actions?**

Currently, SPT provides revenue funding to Community Transport operators in our region and supports capacity building in the sector. SPT provides socially necessary bus services in parts of the LLTNP and works with Stirling Council to provide cross-boundary supported services. Through the SRBS process, as noted above, SPT will explore bus governance models and aims to identify the best model(s) for the region. This includes the needs of rural areas and the supply-side challenges for rural areas. Working with our partner Councils, SPT provides capital funding for a range of local authority active travel projects across its area. SPT’s new Regional Transport Strategy sets out a range of policies to further promote and support active travel including facilitating delivery of a co-ordinated regional active travel network, facilitating and supporting local authority partners to accelerate delivery of new active travel infrastructure and maintain existing infrastructure, and supporting development of schemes to increase access to bikes. SPT is also working with our partner Councils to develop a Regional Active Travel Strategy and Network. The Active Travel Strategy will be a key delivery mechanism of the future Regional Transport Strategy and will build on the work carried out to date with partners on the regional active travel concept network. This work will include development of a regional active travel infrastructure delivery plan to facilitate an accelerated step-change in infrastructure investment/delivery by improving coordination of local/regional projects and resources, particularly on cross-boundary projects.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- SPT and other Regional Transport Partnerships
- Paths for All
- Community Transport operators
- Community Transport Association Scotland

## **RESPONDENT 10**

**The Scottish Gamekeepers Association**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Trees
- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Reduce Grazing Animal Pressures
- Improved Monitoring of Changes in Nature

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Green Jobs, Skills and Business Opportunities

**What role can you play in delivering these objectives or actions?**

The Scottish Gamekeepers Association runs the only Scottish-based training centre for deer managers. Our members have skills to deliver on-ground conservation projects, on land and river. Our river ghillie members are already delivering river restoration programmes in other parts of Scotland so possess knowledge and skills.

**Are there any challenges or barriers we need to overcome to help you do this?**

Skilled deer managers often work in sporting management. There is a Just Transition challenge in that, if sporting businesses are made less viable by, for example, large scale reductions in deer numbers, this impacts the ability of these businesses to retain deer stalking/management staff. This, in turn, would reduce the ability of the Park to achieve its aims because it will reduce available deer management capacity at the time when, it is recognised nationally, that public bodies will require more deer managers to achieve climate and nature targets. There is a balance to be achieved between ensuring deer managers can remain in employment whilst deer impacts are reduced.

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

The rationale and mapping of woodland creation must be carefully explained but, more importantly, must have a strong evidential basis to demonstrate that it will help not hinder carbon goals. There is a lack of research in this area but some long-term studies have shown that creating woodlands on moorland areas, for example, actually sequesters less carbon than if the moorland had remained untouched. Woodlands can help meet carbon goals but not in all places and this plan probably requires greater refinement in line with local knowledge.

**Do you have any comments on these proposed measures or any other suggestions?**

The Draft Plan has the potential for major change, particularly for those working in what could be termed 'traditional' rural occupations. Whilst payments for certain outcomes can be built into future plans for agriculture, it must be acknowledged that major changes to peoples' livelihoods can be very difficult. Many people, who no doubt make up an important element of the Park's cultural heritage, derive their sense of identity from working the land and rivers and any changes must be made in co-ordination with them, their wishes and by tapping into their reservoirs of local knowledge. Our organisation has already found, in other areas of working, that the concept of a Just Transition doesn't necessarily work very well in reality and that people can genuinely suffer at the hands of change which they find poorly evidenced. The SGA would be happy to represent members within the Park who may be experiencing rapid change as a result of Park priorities.

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Local communities & rural businesses

**RESPONDENT 11**

**Ridge Carbon Capture Ltd (RCC)**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Peatland
- Trees

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a Landscape Scale
- Land Managed Primarily for Nature Restoration

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- New Funding Streams
- Green Jobs, Skills and Business Opportunities

**What role can you play in delivering these objectives or actions?**

Ridge Carbon Capture Ltd (RCC) invests in and actively develops peatland restoration projects in Scotland. RCC has an in-house ecology/design team that are boots on the ground, who carry out peatland surveys and design restoration plans. RCC also engages directly with qualified contractors who we trust can carry out the work to the high-quality standards the environment needs, and at the same time RCC manages applications to Peatland Action and registrations under the Peatland Code. RCC oversees restoration works, secures the relevant verifications, and crucially undertakes ongoing monitoring and maintenance for the lifetime of the project - including the management and possible sale of PIUs. RCC can supporting these objectives by investing the private finance mentioned in the aims above for both peatlands and woodlands, as well as by adding qualitative development value given our experience in developing these ecosystem services. RCC can also help facilitate the negotiation and management of legal agreements between a landowning party and purchasers of ecosystem services. Given the longevity and scale of the above objectives, agreements will need to be robust and durable to prevent project failure. For our projects, we implement two agreements - a restoration agreement between landowner and project developer, and a sales agreement between carbon unit seller and buyer. Each has independent but associated obligations, as we have found the management of risk to be particularly sensitive. Implementing comprehensive agreements would support the reliability, success and value of these projects within the National Park.

**Are there any challenges or barriers we need to overcome to help you do this?**

No. We have a very good working relationship with Peatland Action who are supportive of our blended finance approach, and would welcome the opportunity to work with them on these projects.

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

Biodiversity monitoring could be a helpful priority to provide concrete evidence of nature recovery, and may provide enough baseline data to justify credit quantification in the future, which could enable another income stream for the park to spend on other projects. I would also imagine the legal obligations in place to ensure permanence would need particular focus, especially amongst private landowners.

**Do you have any comments on these proposed measures or any other suggestions?**

I think monitoring on restored peatlands may require particular investment/focus, both in terms of environmental benefit as well as quality of PIU generated and resulting value. From our experience, restored peatland sites require particular and frequent oversight to ensure restoration techniques have had the intended impact, especially within the first five years.

**How can you help us to measure them?**

We are developing an enhanced monitoring regime/protocol for our peatland sites, in partnership with various groups across the UK. We would be happy to discuss installing and rolling out these measures on the restored sites within the National Park.

**Do you have any comments on the policies for Restoring Nature?**

I support the requirement for private finance to deliver across more than just the acquisition of a ecosystem service, and community engagement is particularly key. Across all of our projects, RCC funds and runs community engagement initiatives, such as 'Peatlands Days' at local primary schools and apprenticeship positions for restoration projects. These initiatives are at our cost, and we feel it is right to use private finance for public good. I would be keen to see more projects like these from private investors.

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- NatureScot
- Scottish Government

- Deer Management Groups
- Local communities & rural businesses
- Private land managers & their agents
- Private Investor-Developers (unique position as intermediary between landowning party and ecosystem service users)

## **RESPONDENT 12**

### **Paths for All**

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- NatureScot
- Scottish Forestry
- Forestry & Land Scotland
- Environmental NGOs & charities
- Deer Management Groups
- Private land managers & their agents
- Local communities & rural businesses
- Scottish Environment Protection Agency
- Scottish Water
- Scottish Government
- NFU Scotland
- Scottish Land & Estates

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Diversity and Inclusion
- Inspiring Action for Nature and Climate
- Sustainable Visitor Economy

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Recreational Path Network
- Visitor Hubs

**Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?**

- Whole System Approach
- Incentivising Sustainable Travel Choices
- Developing a Rural Transport Sector

**What role can you play in delivering these objectives or actions?**

Smarter Choices Smarter Places should be included. <https://www.pathsforall.org.uk/active-travel/smarterchoices-smarter-places-1> We welcome continued development of the Walk in the Park programme and support for the whole system approach to improving public health from Public Health Scotland

**How can you help us to measure them?**

We should be able to support with data from programmes we support within the park.

**Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?**

Our Smarter Choices, Smarter Places Programme can support this.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Green health partnerships
- Representative bodies and those with a lived experience of barriers to engaging with the National Park
- National Park Destination Group
- Transport Scotland
- Local Authorities
- Loch Lomond & The Trossachs Countryside Trust
- VisitScotland
- Sustrans
- Tourism, hospitality, leisure & recreation businesses
- Community organisations
- Landowners & managers
- ScotRail
- Scottish Enterprise
- Paths for All

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Inclusion & Learning Opportunities
- A Wellbeing Economy

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Low Carbon Local Living
- Increasing Resilience to the Changing Climate
- Rural Transport & Active Travel

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Delivering Positive Local Outcomes

**What role can you play in delivering these objectives or actions?**

Paths for All can support this. Our work supports the delivery of the Scottish Government's Active Scotland Outcomes Framework, National Walking Strategy and the Long-term Vision for Active Travel in Scotland. We promote community and workplace health walking, path network development and active travel. We are a partnership organisation with 30 national partners.

**How can you help us to measure them?**

We should be able to support with data from programmes we support within the park.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Scottish Government
- NatureScot
- Scottish Forestry
- Development Trust Association Scotland (DTAS)
- Scottish Communities Climate Action Network (SCCAN)
- Forestry & Land Scotland
- Transport Scotland
- Loch Lomond & The Trossachs Countryside Trust
- Paths for All

## **RESPONDENT 13**

### **NatureScot**

#### **Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Peatland
- Trees
- Water

#### **Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a Landscape Scale
- Land Managed Primarily for Nature Restoration
- Reduce Grazing Animal Pressures
- Improved Monitoring of Changes in Nature

#### **Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Land Use Change
- New Funding Streams
- Green Jobs, Skills and Business Opportunities

#### **What role can you play in delivering these objectives or actions?**

As Scotland's nature agency our ambition is that all nature in Scotland – our soils, freshwaters, seas, key habitats and landscapes, our green space and our native species – is protected, restored and valued so that we all benefit. Supporting the LL&T National Park Authority to deliver the Partnership Plan. The Future Nature Programme of nature restoration across the National Park will be a key part in delivering our ambitions at a regional scale. In supporting Future Nature we will focus our work on three priority areas: § Protecting Nature by expanding and modernising protected areas, improving and regulating wildlife management, and delivering effective advice on development on land and at sea. § Restoring Nature through a new Scottish Biodiversity Strategy, climate change plan and legislation, regenerating peatlands, aiding nature's recovery and transforming farming and crofting. § Valuing Nature by connecting people and nature, driving better decisions and greater investment based on nature's benefits and helping grow the skills and jobs nature needs and can provide. Details of our work which will support Future Nature is set out below.

Protecting Nature Strengthened protection of existing biodiversity. The degradation of nature contributes to the climate emergency and threatens our society and the wellbeing of future generations. A nature-rich future starts with halting biodiversity loss by protecting what we have now. Our work which will support delivery of Future Nature includes:

- Protect 30% of land and sea by 2030 (30x30). This will contribute to a coherent, robust and effective nature network of protected areas and other area - based conservation measures supporting and integrating with our restoration objectives and sustainable use of our land and sea. We will facilitate the development of nature networks and areas which will contribute to 30x30 within the LL&T National Park. We will support additional protection will help protect biodiversity and support nature networks identified in Future Nature. This will include providing advice on metrics and monitoring to track progress and data support to support development of nature networks within the Park.
- Build stronger collaboration reducing the impacts of deer and modernise our wildlife management and underpinning licencing functions to enable a net zero and nature positive future. We will continue to engage in deer management groups across the Park and target our resource at a small number of priority sites.
- Engage and influence planning and other regulatory systems to ensure they deliver for nature and climate. We will work to deliver guidance on developing with nature to ensure the positive effects for biodiversity described in National Planning Framework 4 are relevant and applicable in the Park. We will work with the National Park Authority to support the planning

process within the Park by sharing our expertise on Protected Areas and the Habitats Regulations. Restoring Nature Protecting the nature we have will not be enough to secure or maintain net zero, or to turn the corner into a nature positive future. We must also restore nature's complexity and connectivity across land and seascapes. Our work to restore nature will include the following which will facilitate the delivery of Future Nature Programme:

- Leading the development and delivery of the 25-year Scottish Biodiversity Strategy (SBS) including large scale restoration measures to regenerate biodiversity, building complexity and connectivity across landscapes, including farms and forests, to better manage the impacts of a changing climate. The SBS will set out delivery plans for how biodiversity can be improved with changes in land management practices commonly found in the LL&TNP.
- Continue to deliver and scale up peatland restoration through Peatland Action funding within the National Park and beyond.
- Deliver a major Nature Restoration Fund targeted at high impact nature recovery projects and seeding greater investment from the private sector. The Nature Restoration Fund has already provided funding to develop large scale nature restoration projects within the Park with further funding will be available for future successful bids. A number of projects within the Park and identified in Future Nature are expected to apply.
- Demonstrate how agriculture can be transformed with new approaches to deliver targeted outcomes for nature and climate. This will include providing standard, fully tested and universally adopted tools for land managers to track their performance on delivering biodiversity gain and low carbon regenerative farming with the aim of every farmer and crofter delivering for biodiversity and climate mitigation and adaptation.

#### **Are there any challenges or barriers we need to overcome to help you do this?**

The action described above and their delivery within the National Park required coordinated action of multiple partners at scale and pace. It is therefore viable that the effective structure exist to help prioritise and coordinate the action. We would welcome the development of a stronger Land Use Partnership and/or Land Use Framework and other governance structures relating to Nature Restoration.

#### **Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

Nature Networks are helpfully seen and the strategic context for much of the landscape-scale nature restoration referred to within the draft Plan. Although it is slightly unclear what is meant by a "Nature Network" within the draft Plan. Given the importance of Nature Networks and recognising their legislative framing, within NFP4, it would be helpful to specific objective to develop a formal Nature Network

#### **Do you have any comments on these proposed measures or any other suggestions?**

State of Nature – We would be happy to work with you on further developing the State of Nature Reporting. There are some significant gaps and resourcing considerations going forward. One consideration, is the extent to which the current indicators facilitate positive changes for nature across the park. Some will, while others are understandably geared more towards the high-level overview of progress. However, when it comes to resourcing data acquisition that has the greatest impact on land management, we feel further thought is required. What is the relative priority of data to report progress versus data to inform management, where they are different. Trees – while extent is important, the value of woodland is also related to its ecological function, and as such we also think it would be helpful to consider measuring the biodiversity value of existing woodland

#### **How can you help us to measure them?**

We can contribute to most of these indicators

#### **Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Scottish Government
- NatureScot
- Scottish Forestry
- Forestry & Land Scotland
- Scottish Environment Protection Agency
- Scottish Water

- Deer Management Groups
- Private land managers & their agents
- Environmental NGOs & charities
- Scottish Land & Estates
- NFU Scotland
- Private finance agencies & brokers

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Inspiring Action for Nature and Climate
- Sustainable Visitor Economy
- Diversity and Inclusion

**What role can you play in delivering these objectives or actions?**

Inspire people to connect with nature, increasing appreciation of nature's value through impactful delivery and communication of our work both national and locally. This will include our National Nature Reserves within the National Park.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- NatureScot
- Tourism, hospitality, leisure & recreation businesses
- Transport Scotland
- Police Scotland
- Forestry & Land Scotland
- Sustrans
- Local Authorities
- VisitScotland
- Scottish Enterprise
- Landowners & managers
- ScotRail

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy
- A Wellbeing Economy
- Inclusion & Learning Opportunities

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Increasing Resilience to the Changing Climate

**What role can you play in delivering these objectives or actions?**

The ways in which we use and consume the products of the natural world need to change if we are to restore nature. The economy is part of that natural system. Nature sustains our economy. If we embrace that idea, nature then emerges as the natural choice to solve many of society's problems. The value of nature is reflected throughout public and private sector policy, strategy and investment towards a wellbeing economy. We will do the following at a national level which will support the Partnership Plan

- Inspire people to connect with nature, increasing appreciation of nature's value through impactful delivery and communication of our work. This will include our National Nature Reserves within the National Park.
- Influence the regulatory, policy, market and institutional infrastructure needed to stimulate private sector investment into nature.
- Drive the establishment of Natural Capital as an integral part of public and private business planning and investment decisions at national, landscape and landholding/business scales
- Promote understanding and awareness of skills and capacity needs for the nature based sector.

**Do you have any comments on these proposed measures or any other suggestions?**

Positive Effects for Biodiversity/Biodiversity Net Gain - if agreed the SG metric on Positive Effects for Biodiversity would be a helpful metric to incorporate

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Skills Development Scotland
- Scottish Government
- NatureScot
- Forestry & Land Scotland
- Scottish Forestry

## **RESPONDENT 14** **Montrose Estates**

**Do you have any comments on the policies for Restoring Nature?**

The Park's 5-year plan can serve as a reference for Land Management Plans should these become required for larger holdings through the Land Reform process. Best practices from across the Park and beyond can be shared. I would not welcome more active involvement of the Park in the development of these plans as this would turn the process into a top-down exercise and dis-engage the actors on the ground who will be the implementors of such plans

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Forestry & Land Scotland
- Private land managers & their agents
- Scottish Government
- Scottish Forestry

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy
- Inspiring Action for Nature and Climate

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Recreational Path Network
- Byelaws

**Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?**

- Whole System Approach

**What role can you play in delivering these objectives or actions?**

Providing sites for pontoon infrastructure on the east side of Loch Lomond

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

Take the Park to the Nation, through education and awareness programmes throughout Central Scotland in particular. These could cover, nature, climate, responsible access, dogs, littering, toileting. Target schools, clubs and community groups. The objective is to change the culture and behaviour of those visiting the Park

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Transport Scotland

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy
- Low Carbon Businesses
- A Wellbeing Economy

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Low Carbon Local Living
- Rural Transport & Active Travel

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Identifying Development Needs and Opportunities
- Delivering Positive Local Outcomes
- Making the Best Use of Land and Assets

**Do you have any comments on these proposed measures or any other suggestions?**

Although the Plan speaks of a transition, throughout the Plan there is very little on where we have been historically and where we are now. Livestock farming underpins the local rural economy and barely gets a mention. What kind of a transition are these practitioners going to be supported in making? Similarly, there are existing local affordable housing plans which have stalled. These should be realised or dropped as well as (and prior to) additional sites being identified.

## **RESPONDENT 15**

### **The Maid of the Loch**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Improved Monitoring of Changes in Nature
- Restore Nature at a Landscape Scale

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- New Funding Streams
- Engaging Communities in Land Use Decisions
- Green Jobs, Skills and Business Opportunities

**What role can you play in delivering these objectives or actions?**

The Maid of the Loch is a floating observatory a way to connect people to the water of the Loch, icon belonging to the people who live and work round the Loch and opportunity for new funding, jobs and skills to be developed round an unique water based resource. We can help deliver the Park's objectives in shaping a new land economy through community benefit from the Maid's opportunity to develop new roles and activities.

**Are there any challenges or barriers we need to overcome to help you do this?**

We need joined up thinking in relation to the many water based and shore side service providers on the Loch, to liberate new partnerships and opportunities. We are constrained through the site within which we operate at Balloch Pier and through the tough grind of raising finance

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

We can bring people into contact with the water habitat of the Loch through the use of the Maid and raise future conservation and development issues. One idea we have is to utilise the existing Duncan Mills building beside the slipway as a museum/information centre/workshop/education resource - but this is at very early stages in our thinking.

**Do you have any comments on these proposed measures or any other suggestions?**

All these targets are primarily land based - the water target is a bit nebulous and requires definition.

**How can you help us to measure them?**

We can hold metrics on different types of engagement with the water environment by people - users of the Maid, museum visitors, specific monitoring and education projects.

**Do you have any comments on the policies for Restoring Nature?**

These are primarily land based - the funding objective at the end chimes with our own one of being nature positive and net zero carbon in our operations. Our eventual programme to

restore the pier network around the Loch and therefore to increase green transport options as well as unlock new opportunities fits with the restoration agenda.

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy
- Inspiring Action for Nature and Climate
- Diversity and Inclusion

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Partnership Approach to Visitor Management
- Visitor Hubs
- Multi-year Place Programme

**Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?**

- Whole System Approach
- Incentivising Sustainable Travel Choices
- Developing a Rural Transport Sector

**What role can you play in delivering these objectives or actions?**

We believe that the Maid has a significant role in delivering these objectives and actions. Balloch Pier is a visitor hub - we believe the restoration and operation of the Maid will deliver significant tourism benefits to the Loch and there is an opportunity for all parties to work together. Water recreation expansion needs imaginative ideas for improving access and piers - starting with Balloch Pier. As mentioned before, there is an opportunity to redevelop existing infrastructure ( Duncan Mills Building and Slipway and the Maid Pier, Winch House and Slipway ) into something that far better serves the above objectives for the future.

**Are there any challenges or barriers we need to overcome to help you do this?**

We need collaboration, partnership and a forward looking plan which engages all stakeholders in achieving better outcomes. Balloch Pier area is a dog's breakfast, not helped by the Maid shipyard operating in the middle and numerous interests poorly served by the existing infrastructure.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

Help us properly manage the opportunity that is the Maid to develop a world class visitor and community hub at Balloch, by engaging with us, a community led charity. Make sure those who can deliver are at the table to raise ambition and stakes.

**Do you have any comments on these proposed measures or any other suggestions?**

Glad to see some attempt to measure volunteer input and also quantifying the visitor economy. Tracking investment is useful, but something more proactive such as enabling new investment partnerships and actively seeking investors would be welcomed.

**How can you help us to measure them?**

We can supply metrics on visitors, track the quality of the visitor experience and type of visit, measure community use and engagement, measure our volunteer input and deliver information about our investment and grant resources ( and the shortfalls ).

**Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?**

The Maid started her life as an inclusive way for the people of Glasgow to enjoy the Loch and the benefits of water encounters with nature. There was no 1st or 2nd Class, lifetime memories of the Loch were created and before air travel, inclusive trips from railway station to pier side was the only outing many people could afford. The whole history of paddle steamers on the Loch is bound up with people and sustainable travel. Your objective of supporting more sustainable ways of travel and the hub concept can be well met by the development of Balloch Pier and the Maid. The West Highland Way can be easily integrated to allow the Maid to take walkers and cyclists some way up the Loch and also reduce pressure on the A82 by providing a route to the top of the Loch that does not involve car transport. Accessibility for all to water travel through the Maid providing fully accessible

transport options for people with disabilities and others, will also be augmented by specialist tours for people with dementia and mental health issues - for whom memories of being aboard the Maid provide comforting experiences and pleasure.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Education & volunteering providers
- Representative bodies and those with a lived experience of barriers to engaging with the National Park
- Tourism, hospitality, leisure & recreation businesses
- Sustrans
- Transport Scotland
- West Highland Way Partnership
- Local Authorities
- ScotRail
- Scottish Enterprise
- Community organisations

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Low Carbon Businesses
- A Wellbeing Economy
- Inclusion & Learning Opportunities

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Rural Transport & Active Travel

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Delivering Positive Local Outcomes
- Identifying Development Needs and Opportunities

**What role can you play in delivering these objectives or actions?**

The Maid is unique as the last paddle steamer built in Scotland. She is also unique as being placed beside the only operating steam winch in the Northern Hemisphere. This uniqueness brings great training, education and heritage opportunities for local communities to learn new skills. Our volunteer programme enables many people who have suffered isolation and loneliness discover a new purpose. The Maid truly belongs to the local community - from those who take part in running the company to the volunteers who want her to sail again. Our plans include significant development opportunities at Balloch which we need to share and progress with partners, of whom the Park are the main stakeholder. We would like to provide leadership and ideas.

**Are there any challenges or barriers we need to overcome to help you do this?**

We need to be the first port of call, not the last to be considered at Balloch Pier and in relation to sustainable development and visitor hub growth. The Park does not mention the Maid within the current draft plan which we think is a real oversight. So profile and visibility of the Maid and the unique possibilities she represents needs to be taken into account.

**Can you suggest any other objectives or actions to help us meet our aims for Enabling a Greener Economy and Sustainable Living?**

I think the objectives set are challenging enough

**Do you have any comments on these proposed measures or any other suggestions?**

No

**How can you help us to measure them?**

We can give employment and training information - new posts, skills developed, longevity of jobs, local engagement

**Do you have any comments on these proposed measures or any other suggestions?**

The delivery of tourism investment at Balloch is a key priority for the Maid - there is the opportunity for significant development with corresponding job creation and regeneration.

The Maid is right plumb in the centre of this and needs to play a central role with partners in delivering a world class destination

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Colleges & Education Providers
- Police Scotland
- Scottish Enterprise
- Highlands & Islands Enterprise
- Scottish Communities Climate Action Network (SCCAN)
- Development Trust Association Scotland (DTAS)

## **RESPONDENT 16**

### **Lochgoil Community Trust**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Trees
- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Land Managed Primarily for Nature Restoration
- Improved Monitoring of Changes in Nature

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Engaging Communities in Land Use Decisions
- Land Use Change

**What role can you play in delivering these objectives or actions?**

Formation of a local Land Use Forum. Encouraging community participation in nature restoration projects.

**Are there any challenges or barriers we need to overcome to help you do this?**

Always funding, but more the level of risk that communities are expected to take: projects needed to be funded from community reserves until funders (who are meant to be partners, sharing the risk), judge whether to honour their side of the commitment and release funds. Constraints from landowners, especially FLS.

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

Don't forget the marine environment. We live on a sea loch in the National Park. It has a huge influence on the local environment, economy and climate.

**Do you have any comments on these proposed measures or any other suggestions?**

Perhaps a broad measure of biodiverse habitat (hectares). Reduction in river headwater/catchment temperatures through riparian planting.

**How can you help us to measure them?**

Submit regular readings from local river monitoring stations

**Do you have any comments on the policies for Restoring Nature?**

Financial incentives are key. Herbivore pressures are next. Communities can only truly contribute with landowner consent and support (and funding of course).

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Scottish Government
- Forestry & Land Scotland
- Scottish Environment Protection Agency
- Private land managers & their agents
- Local communities & rural businesses
- UK National Parks Partnerships

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Inspiring Action for Nature and Climate
- Sustainable Visitor Economy
- Diversity and Inclusion

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Multi-year Place Programme
- Recreational Path Network
- Partnership Approach to Visitor Management

**What role can you play in delivering these objectives or actions?**

Encouraging behavioural change through local active transport initiatives, litter picks, and other community and visitor involvement in projects.

**Are there any challenges or barriers we need to overcome to help you do this?**

A completely misjudged sense of entitlement from those who think they have the freedom to go anywhere and trash it. With freedom comes responsibility. If the public can't take responsibility, then freedoms need necessarily to be curtailed until behaviours change. The festival mentality of visitors (leaving tents and litter behind for others to clean up), needs to be called out as socially unacceptable.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

Community transport is an issue. Roads are narrow and vehicles are getting bigger. More compulsory land purchase for active travel routes.

**Do you have any comments on these proposed measures or any other suggestions?**

Number of public transport miles year on year. Tonnes of litter to landfill.

**How can you help us to measure them?**

Surveys. Installing visitors counters (if supplied).

**Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?**

This is where communities can really contribute. The type of facilities required by communities are also of value to visitors, but generally require a higher level of investment for resilience and capacity (paths, parking, toilets, cafes, shops, etc). Charging point rollout by A&B Council is woeful and needs to be accelerated. A local visitor tax for holidaymakers could help to fund some of this work.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- National Park Destination Group
- Tourism, hospitality, leisure & recreation businesses
- Transport Scotland
- Sustrans
- Local Authorities
- Loch Lomond & The Trossachs Countryside Trust
- Community organisations

- VisitScotland
- ScotRail
- Forestry & Land Scotland
- Landowners & managers

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Increasing Resilience to the Changing Climate
- Addressing Housing Needs
- Rural Transport & Active Travel

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Identifying Development Needs and Opportunities
- Nature-First Approach to Development
- Delivering Positive Local Outcomes
- Making the Best Use of Land and Assets

**What role can you play in delivering these objectives or actions?**

As a community trust, we are focused on delivering positive outcomes for our community. Balancing real and immediate needs with longer-term environmental benefits is still something of a choice to make, when it really shouldn't be. Housing and local transport for rural communities are key issues to be resolved. Local tourism taxes and better feed-in tariffs and reduced ground rent (FLS) for local green energy generation are enablers.

**Are there any challenges or barriers we need to overcome to help you do this?**

Lower risk routes to funding (capital and revenue).

**Can you suggest any other objectives or actions to help us meet our aims for Enabling a Greener Economy and Sustainable Living?**

At a broader level, green jobs, education and the necessary community infrastructure to support them, could help to retain our younger working population.

**Do you have any comments on these proposed measures or any other suggestions?**

Perhaps waste management needs to be considered (including sewage).

**How can you help us to measure them?**

Monitoring and recording local developments in our Local Place Plan implementation. Perhaps a standard set of measures for communities to report on annually?

**Do you have any comments on these proposed measures or any other suggestions?**

In the hierarchy of needs, affordable community housing trumps most issues, yet we want to preserve and protect our green spaces. This conflict can only be resolved by creative thinking and challenging the norms. Local taxes, mid-rise accommodation, acquisition of larger houses for the care of the elderly, etc, etc.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Scottish Government
- Forestry & Land Scotland
- Community organisations
- Housing Providers
- Transport Scotland
- Highlands & Islands Enterprise
- Development Trust Association Scotland (DTAS)

## **RESPONDENT 17**

### **Glenfalloch Estate**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Peatland
- Trees
- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a Landscape Scale
- Improved Monitoring of Changes in Nature
- Land Managed Primarily for Nature Restoration
- Reduce Grazing Animal Pressures

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Green Jobs, Skills and Business Opportunities
- Engaging Communities in Land Use Decisions

**What role can you play in delivering these objectives or actions?**

We are already working with Wild Strathfillan and with the NPA on deer management, habitat improvement and restoration, peatland recovery and native woodland regeneration.

**Are there any challenges or barriers we need to overcome to help you do this?**

The main barrier is management time to deal with the various (sometimes cross cutting) initiatives and consultations and convert this into objectives. Once a specific objective is identified, to convert it into an actionable SMART (Specific, Measurable, Achievable, Realistic and Time focused) plan.

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

The NPA must lead in establishing priorities e.g. nature restoration vs provision of the Park as a leisure destination and adherence to the Sandford Principle

**Do you have any comments on these proposed measures or any other suggestions?**

The missing ingredient in the above, which may be implicit but is so important that it should be explicit, is the "human capital" needed to deliver these goals. A separate workstream is needed to identify the human resource available matched against the goals should be established to identify overall capacity of human resource, existing skill sets, what training is needed better to match skills with delivery goals, accommodation, community needs (schools, social services, local facilities/ shops) and transport facilities, recreation etc)

**How can you help us to measure them?**

Establish detailed questionnaire and elicit responses. DMGs are well placed with good coverage already of the majority of the Park.

**Do you have any comments on the policies for Restoring Nature?**

We must face up to the impact of human activity and address them honestly. Impacts include: visitor pressures on specific sites and areas (e.g. popular spots on the lochs and visitor destinations, over use of some trails/ routes), infrastructure works (road, rail, electricity and telecoms utilities). Where possible restoration should be part of the planning consent process

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- NatureScot
- Forestry & Land Scotland
- Scottish Government
- Scottish Land & Estates
- Scottish Water
- Deer Management Groups
- Private land managers & their agents
- Local communities & rural businesses
- Rural skills training providers
- UK National Parks Partnerships
- Environmental NGOs & charities

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

Establish a charging mechanism for private car visits to the National Park. A version of the ULEZs becoming more prevalent in many cities in the UK could be used so that private cars for non residents have to make a financial contribution to mitigate the impact of recreational journeys.

**Do you have any comments on these proposed measures or any other suggestions?**

Define what "success" in visitor numbers actually means. Is it an absolute number - the more the better - or is it the optimal number that can be sustained in the Park?

**How can you help us to measure them?**

We could report overall numbers of campers/ customers at Beinglas campsite

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- NatureScot
- Scottish Government outdoor learning group partners
- Tourism, hospitality, leisure & recreation businesses
- West Highland Way Partnership

- Loch Lomond & The Trossachs Countryside Trust
- ScotRail
- Landowners & managers

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy
- Low Carbon Businesses

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Low Carbon Local Living
- Increasing Resilience to the Changing Climate

## **RESPONDENT 18**

**Forth Rivers Trust**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Peatland
- Trees
- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a Landscape Scale
- Land Managed Primarily for Nature Restoration
- Improved Monitoring of Changes in Nature
- Reduce Grazing Animal Pressures

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Land Use Change

- New Funding Streams
- Engaging Communities in Land Use Decisions
- Green Jobs, Skills and Business Opportunities

#### **What role can you play in delivering these objectives or actions?**

The Forth Rivers Trust has a diverse skill base which can support land managers, communities and the National Park deliver the partnership plan. Our core organisation model is project based, focused on the development of opportunities

#### **Are there any challenges or barriers we need to overcome to help you do this?**

Our biggest challenge and barrier to delivering for nature is sourcing funding to develop the projects that are needed to do this. We are very grateful to the National park for supporting many of our projects with funding to enable them to happen but all too often, funding for the development of these projects is just not there. This is an expense we need to lay out before the delivery of a project and having funding to support identifying opportunities, negotiating with the landowner and then developing the idea is vital for bigger, more benefiting projects. Many big funders such as esmee Fairbairn are exploring new models of funding that support the organisation and aim to be flexible with the funding. Exploring new models to enable organisations like the Forth Rivers Trust to deliver for nature would benefit the parks ecosystems and not put unnecessary restrictions on supporting nature. We have come a long way since the early grants received by the National Park, but more could be done to enable ideas on the ground. Other challenges the park could support us with is the competition between commercial forestry pressure where forestry directly negatively impacts on a designated area (e.g upper Teith SAC) or impacts negatively on an existing rich habitat. An example of this is where we are working to develop rich wetland habitat. Area's around this new and improved habitat have been ear marked for commercial aspen plantation. It is important to consider the benefits of the economy against the rich habitats that could be impacted locally. Robust regulation within the planning framework would help reduce this risk. More measures in place to protect designations but to also ensure the designations are not fixed in place and time. Designated sites evolve over time, expand and contract, gain new benefits from the local area. Too much focus on the designation boundary rather than the wider landscape happens all too often and more protection to buffers around designations is needed as well. This could be achieved via the planning system. More robust action from the park and NatureScot to not allow practices directly at odds with the partnership plan vision. E.g not issuing licenses to remove beavers if that license is solely for the gain of a commercial interest. Incentivising ecological restoration as a value in itself for landowners/land managers so that the option is more competitive than other practices that may offer higher monetary value While acknowledging the huge strides that need to be made in increasing tree cover and woodland creation, prioritising the diversity of habitats needed so that planting does not negatively impact already rich habitats. Supporting with funding to monitor the natural environment is key as this is always an often overlooked aspect of funding with many funders not prepared to fund monitoring of success.

#### **Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

Offer an incentive grant scheme or award scheme for developing new nature based, low cost technologies that improve sustainability and scalability. One of the many positives from the national park is the willingness to try new methods for nature based restoration. Sometimes though, new delivery methods or techniques may not always work out. having a pot of funding for trialling new techniques with no repercussions on needing to pay it back should the new way of protecting/enhancing nature not work would help fuel new nature based solutions. An innovation pot to trial new way of working. Acting as the agent in any green finance funding. A lot of the time, securing green finance is tricky as it requires a lot of confidence in the organisation to deliver or the organisation needs to be big enough to have the necessary PR or ability to bring in green finance. The National Park could act as a hub, developing green finance opportunities, acting as the "bank" by sourcing funding from companies. This could then be distributed to the delivery agents on the ground, who struggle

to have the understanding and skill to navigate the green finance landscape but can get on with the job of delivering for nature.

#### **Do you have any comments on these proposed measures or any other suggestions?**

Monitoring needs to include a combination of morphology, water quality and biological monitoring to assess success/non-success for improving freshwater environments. Monitoring such as fish population assessments, invertebrate assessments, flora and fauna assessments are all key to help determine success and it should not be just down to water quality. It also needs to be more than RBMP grades, as it has already been identified that RBMP does not fully assess the quality of a habitat for wildlife. RBMP is only one potential way for monitoring success but RBMP also only requires Scotland to reach good status. National Parks should always aim for the highest possible standard and aim for excellent otherwise the park will be just like everywhere else within Scotland. National Parks should be the centres of excellence for nature and nature restoration and aiming for excellent status is a way to show the rest of Scotland how it is done! Using and funding LiDAR or high resolution heavy drone imagery publicly available across the national park so that mapping and modelling for restoration can be more detailed and effective. Such as modelling river restoration, NFM modelling and identifying INNS within the landscape. Partner with universities to support monitoring across the landscape. Develop a monitoring framework so that partners understand the questions needing answered, a route to answering those questions and then the results from enabling the process to happen. Involve delivery partners more in monitoring/measuring success. Offer monitoring funding to collect baseline data and subsequent monitoring. Enabling delivery partners to do this will bring in the data needed to show success. It should however be structured, capturing information collectively and in such a way that it is useable and fits within the plan. We would like to see more work on a delivery plan for monitoring these outcomes.

#### **How can you help us to measure them?**

We have highly skilled staff members trained in fish population monitoring, data and GIS collection, drone flying and mapping, invertebrate monitoring, phase 1 habitat surveys and plant based surveys, bat surveys and more. Enabling us to support monitoring will bring in high quality data to measure success and measure what habitats are like before restoration.

#### **Do you have any comments on the policies for Restoring Nature?**

We think making nature resilient to climate change is needed within the National Park as by identifying areas that are susceptible to climate change will help focus efforts. I.e loch Venachar and the Katrine System. This system is the drinking supply for the greater Glasgow area but also takes in roughly 24% of the Teith catchment. The series of dams are becoming more susceptible to climate change as the last few years have seen extremely dry spring periods meaning low water impacting the system. As it is a drinking supply, the amount of water released for nature and natural processes can sometimes be reduced, impacting the rivers and lochs in this system. This then has an economic impact on local fisheries such as on loch Venachar requiring to shut due to high water temperatures due to the loch heating up quicker due to it being shallower. Policies need to prioritise more than just water quality but also include morphology and biological factors as well for freshwater, its resilience and protection. On green finance, revised procurement/tendering practices and rules to weight more in favour of local suppliers would boost economic development locally and funnel more money into the communities to create a thriving rural economy.

#### **Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Scottish Government
- NatureScot
- Scottish Forestry
- Forestry & Land Scotland
- Scottish Environment Protection Agency
- Scottish Water
- Scottish Land & Estates
- NFU Scotland

- Environmental NGOs & charities
- Deer Management Groups
- Private land managers & their agents
- Local communities & rural businesses
- Private finance agencies & brokers
- Rural skills training providers
- Forth Rivers Trust, Universities and colleges.

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Inspiring Action for Nature and Climate

**What role can you play in delivering these objectives or actions?**

We already run a number of projects around the Forth to inspire people about nature. We run fish in the class, engage with the public on nature based work and topics and have in the past run activities such as guided bike rides, guided walks and river focused events.

**Are there any challenges or barriers we need to overcome to help you do this?**

We were enabled to do most of the above through Callander's Landscape, a fantastic partnership project that brought a range of organisations together to deliver for callander and the surrounding landscape. more projects like this, with the park playing the lead on bringing people together would be fantastic, despite the pains of delivering the project, overall it was a successful achievement that should be replicated. lots of leasons have been learnt to make the next partnership project even more of a success.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- NatureScot
- Green health partnerships
- Education & volunteering providers
- Scottish Government outdoor learning group partners
- Representative bodies and those with a lived experience of barriers to engaging with the National Park
- National Park Destination Group
- Tourism, hospitality, leisure & recreation businesses
- Transport Scotland
- Police Scotland
- Forestry & Land Scotland
- Sustrans
- Local Authorities
- West Highland Way Partnership
- Loch Lomond & The Trossachs Countryside Trust
- Scottish Water
- VisitScotland
- Scottish Enterprise
- ScotRail
- Business Energy Scotland
- Community organisations
- Landowners & managers

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Inclusion & Learning Opportunities

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Increasing Resilience to the Changing Climate

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Identifying Development Needs and Opportunities

- Nature-First Approach to Development
- Delivering Positive Local Outcomes
- Making the Best Use of Land and Assets

**What role can you play in delivering these objectives or actions?**

As previously mentioned, we are a delivery based organisation with a focus on delivering for nature. We have the ability to support communities within the park to build sustainable landscapes which take into account current and future land use to grow their communities in environmentally sustainable ways.

**Are there any challenges or barriers we need to overcome to help you do this?**

Again, mostly funding to deliver. Callanders Landscape was such a great partnership project which delivered resources to organisations like the Trust to support communities in thinking big for nature.

**Do you have any comments on these proposed measures or any other suggestions?**

We think that although the government targets are ambitious for biodiversity net gain, we feel that in the national park, there should be higher targets for developers to meet biodiversity net gain. Let's use the park as the exemplar for net gain and ensure all future developments pride themselves in boosting biodiversity in the park either local to the development or where space allows.

**Do you have any comments on these proposed measures or any other suggestions?**

Natural Flood Management should be a key focus and priority for building strong and resilient communities and rural economies. Boosting NFM measures in a catchment will benefit communities downstream by reducing impacts of flooding but also helping nature become more climate resilient. When new developments are going in, it would be good to identify NFM measures to help slow the flow during planning stage that could be implemented to help reduce the impact of flooding from developments.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Skills Development Scotland
- Scotland's Rural College (SRUC)
- Colleges & Education Providers
- Scottish Government
- National Park Youth Committee
- NatureScot
- Police Scotland
- Scottish Forestry
- NFU Scotland
- Highlands & Islands Enterprise
- Forestry & Land Scotland
- Scottish Enterprise
- Scottish Land & Estates
- Community organisations
- Landowners, land managers & agents
- Transport Scotland
- Scottish Communities Climate Action Network (SCCAN)
- Housing Providers
- Development Trust Association Scotland (DTAS)
- Loch Lomond & The Trossachs Countryside Trust

**RESPONDENT 19**

**Forestry and Land Scotland**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Peatland
- Trees
- Water

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Restore Nature at a Landscape Scale
- Land Managed Primarily for Nature Restoration
- Improved Monitoring of Changes in Nature

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Land Use Change
- Engaging Communities in Land Use Decisions

**What role can you play in delivering these objectives or actions?**

FLS will be delivering on management of existing woodland (including rainforest), peatland restoration, deer management, water management (e.g. SUPERB project, planting at Rest & Be Thankful), INNS control etc.

**Are there any challenges or barriers we need to overcome to help you do this?**

Will be looking for help in those areas where landscape scale collaborative working adds most value - in particular deer management and INNS control

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Scottish Government
- NatureScot
- Scottish Forestry
- Forestry & Land Scotland
- Scottish Water
- Scottish Environment Protection Agency
- Scottish Land & Estates
- Environmental NGOs & charities
- Deer Management Groups
- Local communities & rural businesses
- Private land managers & their agents
- NFU Scotland
- Rural skills training providers
- Private finance agencies & brokers
- UK National Parks Partnerships

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy
- Inspiring Action for Nature and Climate

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Recreational Path Network
- Partnership Approach to Visitor Management
- Promoting Visitor Safety

**What role can you play in delivering these objectives or actions?**

Working in conjunction with LLTNP to manage visitor access to FLS sites

**Are there any challenges or barriers we need to overcome to help you do this?**

FLS will be looking to work closely with LLTNP to ensure appropriate balance between access to nature and safety when utilising FLS' network of forest roads and paths. Continue to work collaboratively on provision of ranger services within the park.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

It would be helpful if LLTNP could explore options for funding streams around core paths.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Representative bodies and those with a lived experience of barriers to engaging with the National Park
- Green health partnerships
- Tourism, hospitality, leisure & recreation businesses
- Transport Scotland
- Sustrans
- West Highland Way Partnership
- Local Authorities
- Loch Lomond & The Trossachs Countryside Trust
- VisitScotland
- Landowners & managers
- Community organisations
- Forestry & Land Scotland
- National Park Destination Group
- Police Scotland
- Education & volunteering providers
- Scottish Water
- ScotRail
- Scottish Enterprise

**Are there any challenges or barriers we need to overcome to help you do this?**

FLS would like to see more affordable housing within the park for those who work there, as this is often a significant barrier to recruitment in the 'green jobs' sector.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Skills Development Scotland
- Scottish Enterprise
- Scottish Land & Estates
- Landowners, land managers & agents
- Community organisations
- Loch Lomond & The Trossachs Countryside Trust
- Housing Providers
- Scottish Government

## **RESPONDENT 20**

### **Firstport for Social Entrepreneurs Group**

#### **Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy

#### **Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Rural Transport & Active Travel

#### **What role can you play in delivering these objectives or actions?**

The Firstport for Social Entrepreneurs Group is the leading Scottish agency for supporting social entrepreneurs, social enterprises, and purpose-led businesses. Encompassing Firstport for Social Entrepreneurs, Firstimpact and Firstfund, the group has over 16 years of experience helping thousands of entrepreneurs to develop, start, and grow their businesses. Our group vision is a society in which doing business is synonymous with doing good. Deliberately ambitious, our vision describes the prospect of a society where all businesses operate to the benefit of their communities, in harmony with nature, and with respect for future generations. Firstport is the first port of call for individuals who have a social impact idea and want to make it their business. It offers early-stage social entrepreneurs a full package of support that includes local idea generation, seed funding, business advice, training and sympathetic growth finance. Firstport can offer extensive support to the National Park around the goal of 'Enabling a Greener Economy and Sustainable Living'. Our existing programmes offer a range of support for early-stage social enterprises, while we also have extensive experience of designing bespoke support with partners to stimulate new and innovative social enterprise solutions to local problems. Examples of programmes Firstport has successfully delivered which could support the delivery of the National Park's objectives include: Objective 1: Transition to a greener economy Action: Support closer working between the public sector, land managers, businesses and communities to grow the green economy, including opportunities for new business models, collaborative pilots and community led social enterprise that will help build and retain local economic wealth and grow the local workforce Example: The Social Innovation Challenge Firstport's Social Innovation Challenge takes a challenge model approach to help innovators kickstart solutions that tackles some of the most pressing challenges of our time. Centred around a different theme every year, it poses a clear challenge that needs a fresh approach, a new idea or an innovative solution to address it and provides £50,000 grant funding and free business support to help make it happen. In 2022, the theme looked for innovative solutions to climate change challenges faced by rural communities in Scotland. The challenge was won by the Iona Heat Network, a project developed by Iona Energy Ltd, a wholly-owned subsidiary of the community-led charity Iona Renewables. The project will use an existing technology – ground source heat pumps – to enable the residents of this remote Hebridean island to move away from a reliance on fossil fuels and address the problem of fuel poverty which disproportionately affects them. The Social Innovation Challenge grant allowed Iona Energy Ltd to secure community-based expertise, leadership and continuation, as well as funding technical work and community engagement to help move this ambitious project towards delivery. The team on Iona have also been offered bespoke business advice, funded places on relevant courses and introductions to other stakeholders in the renewable energy sector. As the project develops and moves closer to construction, the Firstport team will continue to work closely with the Iona Energy Ltd team, with additional support on marketing and communications already in the planning, as well as a joint session during the 2023 SCVO Gathering to share lessons and learnings from this ambitious project with other communities who may be facing similar challenges. Objective 2: Rural transport and active travel Action: Support communities to identify improvements to rural transport options through collaboration with public/private sector to establish innovative solutions or new social enterprise opportunities. Example: NESTA ShareLab Firstport partnered with NESTA to

deliver business advice support to community transport programmes through its ShareLab programme. This included support to Glasgow Community Transport to develop a digital booking tool with the ambition of becoming a digital hub for community transport nationally, and Helping Go, an initiative to enhance the provision and management of volunteer car journeys using technology to link car schemes, drivers, passengers and corporations. Example: LaunchMe Through Firstport's investment readiness programme, LaunchMe, Firstport provided bespoke business support, training, peer support and grant funding to South Ayrshire Community Transport. SACT is a community transport charity offering the only wheelchair accessible community transport in South Ayrshire. LaunchMe supported them to source £95k additional investment to scale their impact, reaching new demographic groups such as the elderly, young and unemployed. Objective 3: Community influence and place making Action: Support to communities to care for heritage assets, where possible linked to opportunities for re-use, social enterprise and job creation. Example: What If....? Firstport's early-stage incubator programme, What If, stimulates and supports the development of new enterprises rooted in the community. Bringing together and working with local people, it empowers them to consider both the strengths of their local community as well as the things they'd like to change and helps them turn their ideas into projects and businesses that address local problems, transform their local area and benefit the wider community. Taking a very local, place-based approach, it puts those who live, work, and know the community best at the heart of plans to support local wealth building. A full programme of support, it provides access to seed funding and intensive business support, peer support and mentoring. This model has established success in rural areas including Campbeltown and Dunoon, as well as in more urban areas including North Edinburgh.

#### **Are there any challenges or barriers we need to overcome to help you do this?**

Knowledge and understanding of social enterprise Despite Scotland's move towards a purpose-driven wellbeing economy, social enterprise as a concept is not widely understood among the general public. Firstport can deliver outreach events and inspirational case studies from rural communities to help engage local people in the concept of social enterprise, understand how it can help address local social and environmental issues and fulfil the National Park's ambitions for a greener, more sustainable economy. Confidence and skills Our experience of supporting start-up social entrepreneurs is that there is not a shortage of ideas, but that individuals and communities lack the confidence, skills and knowledge to take forward their idea and make it a business. Firstport can provide mentors and experienced business advisors to help support social entrepreneurs on their journey, providing practical advice, training and coaching to help aspiring and early stage social entrepreneurs overcome the inevitable challenges along the way. Firstport can also connect social entrepreneurs with others in rural communities across Scotland facing similar challenges or developing comparable ideas, through its national network of social entrepreneurs. Access to funding and investment Social enterprises are restricted in accessing funds for growth, as they are unable to issue equity to standard VC or angel investors and many charitable foundations exclude legal structures like CICs. Firstport offers start-up grant funding for start-up social entrepreneurs ranging from £500 to £25,000 through the Social Entrepreneurs Fund. However the funding is typically over-subscribed and is not guaranteed. Firstport could manage a dedicated funding pot for local social entrepreneurs which could help stimulate and grow local social enterprises in the Park, and provide advice on the amounts needed and the best way to monitor its impact. Firstport can also offer tailored investment support for more established community organisations. Firstport's Boost It programme offers £30-50k in 0% interest free loans designed to help social enterprises to strengthen their business to reach a point of sustainable trading. The Catalyst Fund offers loans of £50k+ through a flexible, revenue-based repayment model. For social enterprises in need of support to leverage funding, investment, and loans, Firstport delivers an intensive investment readiness programme called Launch Me. Data As Scotland's development agency for start-up social enterprise, we have a birds eye view of the social enterprise ecosystem data across Scotland. However as the National Park does not correspond to local authority boundaries, it is not currently possible to accurately map the current social

enterprise footprint in the park through existing data. Firstport could work with the National Park to more accurate ways of tracking and reporting on social enterprise activity to better identify gaps and opportunities.

**Do you have any comments on these proposed measures or any other suggestions?**

To measure success towards the 'Transition to a Greener Economy', the National Park could also track the increase in the number of social enterprises trading in the area.

**How can you help us to measure them?**

Firstport can provide advice around appropriate measures of success (beyond jobs created) to track progress in the development of the social enterprise ecosystem in the National Park. This could include the number of social entrepreneurs being supported, number of growth plans developed, value of grants/investment sourced, number of new social enterprises trading etc.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Firstport for social entrepreneurs, Just Enterprise, Community Enterprise

## **RESPONDENT 21**

### **Confederation of Forest Industries**

**Which of the objectives on Restoring Nature for climate can you or your organisation help to deliver?**

- Trees

**Which of the objectives on restoring nature for healthy ecosystems can you or your organisation help to deliver?**

- Reduce grazing animal pressures
- **Restore nature at a landscape scale**

**Which of the objectives on shaping a new land economy can you or your organisation help to deliver?**

- Engaging in land use decisions
- New funding streams
- Land use change

**What role can you play in delivering these objectives or actions?**

The Confederation of Forest Industries (ConFor) is a not-for-profit membersâ€™™ organisation that represents, supports and promotes the sustainable forestry and wood products industry.

We see that we have a role in supporting the National Park in delivering its objectives by providing key contact and representation for the private forestry sector. Confor focuses on the strategic issues that are vital to the success of the sector whilst providing a sustainable future.

**Which Delivery partners do you think have the biggest role to play in restoring nature?**

- UK National Parks Partnerships
- Rural skills training providers
- Private finance agencies and brokers
- Local communities and rural businesses
- Private land managers and their agents
- Deer management groups
- Environmental NGOs and charities
- NFU Scotland
- Scottish Land and Estates
- Scottish Water
- SEPA
- FLS
- Scottish Forestry
- NatureScot
- Scottish Government
- Confor

**Which of the objectives on connecting everyone with nature can you or your organisation help to deliver?**

- Inspiring action for nature and climate
- Sustainable visitor economy

**Which of the objectives on improving popular places and routes can you or your organisation help to deliver?**

- Promoting visitor safety
- Partnership approach to visitor management
- Recreational Path Network

**Which delivery Partners do you think have the biggest role to play in creating a sustainable, low carbon destination>**

- Scotrail
- Visit Scotland
- FLS
- Transport Scotland
- Representative bodies and those with a lived experience of barriers to engaging with the National Park
- NatureScot

**Which of the objectives on enabling a greener and rural economy can you or your organisation help to deliver?**

- Inclusion and learning opportunities
- Low carbon businesses
- Transition to a greener economy

**Which objectives on living well locally can you or your organisation help to deliver?**

- Addressing Housing needs
- Increasing resilience to the changing climate
- Loch carbon local living

**Which of the objectives on harnessing development and infrastructure investment can you or your organisation help to deliver?**

- Making the best use of land and assets
- Delivering positive local outcomes
- Nature first approach to development
- Identifying development needs and opportunities

## **RESPONDENT 22**

### **Argyll and Bute Council**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Peatland
- Trees

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Land Managed Primarily for Nature Restoration

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Land Use Change
- Green Jobs, Skills and Business Opportunities

**What role can you play in delivering these objectives or actions?**

• On Peatland and on Trees: Forests and woodland cover over 30% of the land area of Argyll and Bute. As stated in Argyll and Bute Council Decarbonisation Plan 2021 (<https://www.argyll-bute.gov.uk/moderngov/documents/s168183/Decarbonisation%20Plan%20Appendix%20A.pdf>), the Council will work with partners to offset our emissions through partnership and innovation - carbon capture in peatland restoration, tree planting and other forms of offsetting. • On Land Managed Primarily for Nature Restoration: participate in the Nature Restoration Land Forum, when it is created, to adopt a collaborative approach to nature restoration. • On Land Use Change: participate in the Regional Land Use Partnership, when it is set up, for strategic, joined-up planning on land use changes. • On Green Jobs, Skills and Business Opportunities: recognition of the demand for skills development for climate and nature restoration, regenerative agriculture and sustainable forestry projects.

**Do you have any comments on these proposed measures or any other suggestions?**

A very limited number of contractors available, for instance, for peatland restoration; therefore sharing the resources as part of packaging up projects more strategically. Increased funding to deliver some of the actions. The Council has limited resources in terms of personnel to deliver on Restoring Nature, for example, on the biodiversity program. Engage with stakeholder organisations, and land managers to trial and pilot restoration projects on water bodies and associated vegetation.

**Do you have any comments on the policies for Restoring Nature?**

The Council encourages a collaboration to introduce the policies including the National Planning Framework 4 and the draft of the Local Development Plan 2, yet to be adopted; Conversations on producing maps of the Nature Networks; Contribution to the Argyll and Bute Local Biodiversity Action Plan which is currently being re-drafted to align it with the Scottish Biodiversity Strategy 2023. The Council has to be consulted on any plans for introductions or translocation of existing or former native species.

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Argyll and Bute Council
- Forestry & Land Scotland
- Scottish Government

- Scottish Environment Protection Agency
- UK National Parks Partnerships
- Private land managers & their agents
- Local communities & rural businesses
- Scottish Land & Estates
- NFU Scotland
- Deer Management Groups
- Rural skills training providers

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Sustainable Visitor Economy
- Inspiring Action for Nature and Climate

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Multi-year Place Programme
- Visitor Hubs
- Partnership Approach to Visitor Management
- Byelaws
- Promoting Visitor Safety

**What role can you play in delivering these objectives or actions?**

• On Sustainable Visitor Economy: keep working with Destination groups like DMOs on nature-based tourism offerings. • On Multi-year Place Programme: contribute to the Strategic Tourism Infrastructure Development Studies as a key stakeholder; as a partner public body support funding applications for relevant funding for visitor infrastructure development projects. • On Visitor Hubs: continue managing Arrochar car park project. • On Partnership Approach to Visitor Management: a coordinated approach to litter management and operation of publicly managed visitor facilities. • On Byelaws: exchange a good practice experience in providing a high quality camping experience. • On Promoting Visitor Safety: continue participation in the Argyll and Bute Community Safety partnership which develops a consistent approach to outdoor safety awareness.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

By introducing a flexible working scheme and reducing the need to travel the Council reduced business mileage by 90%; another measure is changing fleet to more environmentally friendly vehicles.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Tourism, hospitality, leisure & recreation businesses
- Transport Scotland
- Forestry & Land Scotland
- Local Authorities
- Loch Lomond & The Trossachs Countryside Trust
- West Highland Way Partnership
- VisitScotland
- Community organisations
- Landowners & managers
- ScotRail
- Police Scotland
- Green health partnerships
- NatureScot

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Transition to a Greener Economy
- A Wellbeing Economy

**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

- Low Carbon Local Living

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Identifying Development Needs and Opportunities

**What role can you play in delivering these objectives or actions?**

• On Transition to a greener economy: Argyll and Bute Council will keep working in partnerships on identifying the needs for skills development programs for the nature-based workforce such as woodland planting and peatland restoration. • On Low-Carbon Businesses: Argyll and Bute Council works on developing Food and Drink Strategy which includes Argyll and Bute Council mapping project of local food and drink supply chain. • On Low carbon local living: in 2021 Argyll and Bute Council adopted Argyll and Bute's first Community Food Growing Strategy, aimed at encouraging and empowering people to grow their own food (<https://argyll-bute.maps.arcgis.com/apps/MapJournal/index.html?appid=8b4f54a2f5034d9299bdb11369408dc6>); the Council will share the experience in community empowerment.

**Can you suggest any other objectives or actions to help us meet our aims for Enabling a Greener Economy and Sustainable Living?**

Educating communities to understand the Community Empowerment Act and encourage community groups to take ownership of land while managing expectations from the Council for allotment allocation for example.

**Which delivery partners do you think have the biggest role to play in Enabling a Greener Economy and Sustainable Living? Feel free to add any you think are missing from this list.**

- Local Authorities
- Skills Development Scotland
- Colleges & Education Providers
- Scottish Government
- National Park Youth Committee
- Forestry & Land Scotland
- Community organisations
- Loch Lomond & The Trossachs Countryside Trust
- NFU Scotland
- NatureScot

## **RESPONDENT 23**

### **Ardroy Outdoor Education Centre**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

- Trees

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

- Improved Monitoring of Changes in Nature
- Restore Nature at a Landscape Scale

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

- Engaging Communities in Land Use Decisions
- Green Jobs, Skills and Business Opportunities

**What role can you play in delivering these objectives or actions?**

I am completing this survey on behalf of Ardroy Outdoor Education Centre - based in Lochgoilhead. We work well in partnership with LLTNP and the John Muir Trust delivering Env Themed courses to circa 2,500 children p/a

**Are there any challenges or barriers we need to overcome to help you do this?**

More support from LLTNP- in the draft plan there is no mention of the 7 OEC's operating in (or adjacent to) the park. Our combined input is 94,000 learning days per annum, this was communicated in a meeting with Kenny Auld and Nik Turner in Sept 2022. It is disappointing to see no mention in the plan apart from a vague statement "work with Scottish Govt Outdoor Learning Group Partners" (which does not really make sense)

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

Work in partnership with OEC's - support us in developing conservation programmes (through the JOhn Muir Award?) in order to make children visiting The Park aware of the need for env action.

**Do you have any comments on these proposed measures or any other suggestions?**

We co manage Cormonachan Community Woodlands - our children attending contribute to removal of invasive species as part of their JOhn Muir Award.

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

- Scottish Government
- NatureScot
- Scottish Environment Protection Agency
- Private land managers & their agents

- Forestry & Land Scotland
- Scottish Water
- Outdoor Education Centres!

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

- Inspiring Action for Nature and Climate

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

- Promoting Visitor Safety
- Partnership Approach to Visitor Management

**What role can you play in delivering these objectives or actions?**

Thanks to funding from Zero Waste Scotland and Climate Challenge Fund, we have a range of Carbon reducing measures in place, including a Biomass heating system, polytunnels for drying kit in the summer, we compost most of our food waste. We can then showcase this to our resident groups as ways of living in a more sustainable manner.

**Are there any challenges or barriers we need to overcome to help you do this?**

More support for OEC's

**Do you have any comments on these proposed measures or any other suggestions?**

Use data already being gathered by OEC's to assess Nature Connectedness in as a result of their residential stay in The Park

**How can you help us to measure them?**

We are undertaking a 2 year longitudinal study in conjunction with Stirling University to assess Nature Connectedness in two schools who attend Ardroy twice (in P6 & P7) and complete their JOhn Muir Award. This is just one example of how OEC's are influencing future positive behaviours by young people

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

- Transport Scotland
- Loch Lomond & The Trossachs Countryside Trust
- VisitScotland
- Sustrans
- NatureScot
- Scottish Government outdoor learning group partners

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

- Inclusion & Learning Opportunities

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

- Making the Best Use of Land and Assets

## **SECTION 7 – Email Responses**

### **Respondent 1**

#### **University of Strathclyde**

I am writing to respond to the Draft Partnership Plan. As you know, the University of Strathclyde owns and operates an asset at Ross Priory, Gartocharn. The asset is one of the University's built environment assets in west central Scotland that we are seeking to decarbonise and make more climate resilient. For instance, we are currently working with a design team to inform a proposed community solar PV array on some of the estate grounds at Ross Priory as part of our net zero ambitions. This is in order to meet our University net zero target and also to align with the Scottish and UK government's climate legislation and related guidance. Our ethos is to seek to enable the assets that we own and operate to use their built and natural environment potential to generate renewable heat and power. The Draft Partnership Plan and related national park guidance helps us to understand what the authority's plans are for the locale and the observations that I make here are with this in mind. It is also part of our ethos to work with partners to enable aligned objectives and we are keen to support the Park Authority and local communities and businesses. We see potential for this collaboration on aspects such as energy generation and storage that can enable a transition away from fossil fuels. Our students are also playing their part in this work and we have recently supported one of our MSc students who carried out an assessment of the potential for south Loch Lomond to support electrified land and water transport that is clean, accessible and affordable. This may be of interest to the National Park Authority.

My observations with respect to the Draft Plan are summarised below:

#### **P41 – Renewables.**

There is some mention of renewables in terms of 'what the Park could be' yet there is little direct mention of solar power generation or indeed the creation of clean heat and cooling from water or ground sources or indeed the use of forest resources for generation of heat. It is apparent that the Park is a rich resource for renewable energy at some scale that is

greater than the so-called micro-scale mentioned in the plan. Scale is important if there is to be a practical shift away from fossil fuels. I would expect that one of the stated targets of the Plan would be to assess the whole park's total kWh potential to generate heat, power and cooling for the communities and businesses operating within the Park and adjacent to it. Much like the recent 'ParkPower' study undertaken by Greenspace Scotland with Ramboll across Scotland

<https://www.greenspacescotland.org.uk/Pages/Category/energy> For instance, this work identified that in West Dunbartonshire and Stirlingshire, the greenspace potential could generate 136,000MWh of clean heat into 15% of homes across these areas. Parts of the National Park (subject to assessment) can offer up the following opportunities for economic empowerment of communities from the generation of energy and use of that energy locally:

- Low carbon energy generators, flexible energy stores and effective energy infrastructure hosts.
- The sub-surface beneath greenspaces offers considerable potential for heat collection (from both ground and water sources) using heat pumps.
- Surface water in lochs and rivers in greenspaces also offer significant potential for heat generation using heat pumps.
- Ground and water sources above and below surfaces could store heat over short and longer periods.
- The 'soft dig' nature of greenspaces mean transporting costs would be less when using district heat networks, which could utilise existing green infrastructures. This could be a solution for denser community areas in or adjacent to the Park.
- Some greenspaces, or parts of greenspaces, could be re-purposed for electricity generation using solar PV, and linked to community or visitor use for buildings deployment or for roads and car parks to install EV charging infrastructure for vehicles and cycles. This could be 'In transit' EV charging near major roads or junctions or transport interchanges; or low-carbon heat supply to nearby high-energy demand buildings such as residential flats, houses or leisure centres, hotels, hostels, offices, community buildings and so on).

There are several proposed large scale renewable energy generation and storage developments immediately adjacent or within the National Park at Vale of Leven and Sloy. These generational developments will generate significant revenue from power sales and grid balancing revenue. What new economic models could the National park Authority enable in collaboration with these developers? Models that directly enable the economic resilience of all members of the local community including businesses? The Partnership Plan could seek to enable a different set of economic models in partnership with stakeholders that can enable the Park's aims and objectives and sustain people and place at the same time.

#### **P46 Carbon Markets**

There is clearly some sort of opportunity for the Park's natural capital to generate revenue based around carbon storage and sequestration. The University is aware that this agenda could enable and empower communities alongside any corporate revenue generation and this focus of the Plan could and should be ensuring that the revenue generated delivers a series of socially just outcomes. Would it not be sensible to include the work being carried out by the Scottish Land Commission in this part of the Plan?

#### **Partnerships and Collaboration**

The University is supportive of the National Park aims and objectives and will be keen to support the work of the Park authority, particularly in respect to the areas noted above.

## **Respondent 2**

### **Transport Scotland**

#### **Introduction**

Transport Scotland welcomes the publication of the National Park Partnership Plan. We recognise that the Plan has been informed by wider public policy such as the National Transport Strategy (NTS2) and its four interconnected priorities: Reduces Inequalities, Takes Climate Action, Helps Deliver Inclusive Economic Growth and Improves our Health and Wellbeing.

We are encouraged to see prominence of climate adaptation in opening 'Climate' section and in general introduction section as well as – links to forthcoming TS adaptation strategy for transport system. We agree with the vision of 'Climate Resilient place'.

The Partnership Plan recognises that the National Park hosts nationally strategic infrastructure including the A82, A83, A84 and A85 Trunk Roads that are the responsibility of Transport Scotland.

Transport Scotland provides the following consultation response in relation to transport policy generally speaking and the **A82 Tarbet to Inverarnan** improvement and **A83 Rest and Be Thankful** schemes in particular.

#### **A82 Tarbet to Inverarnan**

The A82 trunk road forms a strategic link in Scotland's transport network, connecting the Highlands and Islands to Glasgow and the Central Belt. The route is vital in helping to support economic growth and development in the north and west of Scotland. The A82 is also a key tourist route providing access to Loch Lomond and The Trossachs National Park, Fort William, and the Highlands and Islands. This scheme is a nationally strategic infrastructure development that includes active travel infrastructure improvements that contribute to the national walking, cycling and wheeling network which is National Development 8 identified in NPF4.

The **A82 Tarbet to Inverarnan** scheme includes active travel facilities consisting of a 17km extension of the West Loch Lomond Cycle Path, connecting Tarbet, Ardlui and Inverarnan

and bringing improved active travel accessibility to the National Park. This high-quality shared-use path will provide connections to public transport facilities including the railway station in Ardlui, bus stops at key locations along the A82, and water-based transport services. The necessity for extensive civil engineering works associated with the proposed scheme provides a significant opportunity to deliver this cycle path extension which, as a stand-alone intervention, is unlikely to be feasible in the current constrained corridor of the A82.

Transport Scotland recognises that the scheme should be designed and delivered in ways that are sensitive to the National Park's special environmental and landscape qualities and maximises benefits to local communities, businesses and visitors. To this end, Transport Scotland continues to work in partnership with the Loch Lomond and Trossachs National Park Authority in relation to the design and assessment of the proposed scheme, building upon the successful consultation and relationship fostered between Transport Scotland and the National Park Authority throughout the project's development.

### **A83 Rest and Be Thankful**

The A83 trunk road forms a strategic link in Scotland's transport network, connecting the Highlands and Islands to Glasgow and the Central Belt. The route is vital in helping to support economic growth and development in the west of Scotland. The A83 is also a key tourist route providing access to Loch Lomond and The Trossachs National Park, and the Highlands and Islands. The Scottish Government is committed to an infrastructure solution to address the A83 Rest and Be Thankful landslip risks.

This **A83 Rest and Be Thankful** scheme is a nationally strategic infrastructure development which is intended to address the issue of landslides and consequential disruption to road users, near the Rest and be Thankful pass, also known as Glen Croe.

Ministers share the urgency communities and businesses place on maintaining and improving connectivity of this vital route, which is why the Scottish Government is progressing measures for the short, medium and long term in tandem.

Short term mitigation work continues to be taken forward at the Rest and Be Thankful with approximately £16m spent to date on works such as catchpits, debris fencing, drainage improvements and tree planting.

On 23 December 2022 it was announced that the preferred option for a medium term solution in addressing the landslip risks at the Rest and Be Thankful was improvements to the existing Old Military Road (OMR). These medium-term improvements will improve the resilience of the diversion route until the long-term solution to the problems at the Rest and Be Thankful is in place. A detailed programme for the phased construction of the medium-term improvements is being developed, and it is expected that these works will be carried out on a phased basis starting later this year. The proposed improvements include debris catch fences, temporary bunds, drainage improvements and widening, and discrete realignment to improve bends and avoid flooding.

As the National Park Authority are aware, the scheme is currently progressing the Design Manual for Roads and Bridges (DMRB) Stage 2 route options assessment for the long term solution. Five route options within the preferred corridor have been published and these range from traditional roads and localised structural protection to full tunnel options. The range of engineering structures reflects the challenge of building resilience into the route. It is anticipated that an announcement on the preferred route option for the long term solution will be made in spring 2023.

Transport Scotland continues to consult with the Loch Lomond and Trossachs National Park Authority in relation to the design and assessment of the proposed scheme, building upon the successful consultation and relationship fostered between Transport Scotland and the National Park Authority throughout the project's development.

### **Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver? What role can you play in delivering these?**

Through the **A82 Tarbet to Inverarnan** scheme, Transport Scotland could help deliver a number of objectives and actions outlined in the Draft Plan.

The 17km extension of the West Loch Lomond Cycle Path which forms part of the proposed scheme would contribute to **Improving Popular Places and Routes** (page 70) through provision of active travel infrastructure improvements that support **Low Carbon Travel for Everyone** (page 79) and form **a key part of an integrated, connected multi-modal transport experience of the Park** (page 82). This shared-use path would provide additional connectivity to the **Recreational Path Network** (page 75) along the A82 for both communities and visitors. It would support the **Rural Transport and Active Travel** action (page 103) to establish active travel opportunities within and between communities, to help more people meet their everyday needs by walking, cycling or wheeling as well as supporting health and wellbeing outcomes.

In addition, the proposed cycle path extension would support the provision of new stopping opportunities along the A82 for path users contributing to **visitor management and dispersal** (page 86) along the north-west side of Loch Lomond with the potential to create access to new visitor experiences. Transport Scotland will continue to work with the National Park to bring forward such proposals as part of the proposed scheme.

The proposed scheme would support **Living Well Locally** (page 98) by **increasing resilience** of the A82 **to the changing climate** (page 102), reducing the risk of cutting off the communities it serves:

- the scheme's drainage design and finished road level would incorporate a climate change allowance to take account of the increased severity of flood events;
- proposed rock cutting and soil slope stabilisation measures have been designed to reduce the risk of landslip events; and
- rock traps would facilitate the containment of falling debris, and wider verges would improve access for maintenance, minimising any instances of unplanned road closures.

The Environmental Impact Assessment (EIA) will consider the likely impacts of the proposed scheme on the environment by comparing it with the expected conditions that would occur without the introduction of the scheme. The proposed scheme design incorporates a range of landscape and environmental mitigation measures that would support objectives and actions outlined in the Draft Partnership Plan.

These proposed mitigation measures support **Restoring Nature** (page 34). As compensation for the areas of ancient and Scottish Biodiversity List woodland that would be lost through construction of the proposed scheme, Transport Scotland would commit to deliver new woodland creation and woodland restoration at sites adjacent to the A82 trunk road and at other sites within the National Park to be delivered in a timescale aligning with the proposed scheme's construction. This would support the objectives of **Restoring Nature for Climate** (page 36) and to **Restore Nature at a Landscape Scale** (page 42) by expanding, connecting, and strengthening the major habitat networks of trees and woodland. Through the woodland restoration measures which are also incorporated in the proposed scheme's design, Transport Scotland is committed to **tackling Invasive Non-Native Species** (page 42).

The proposed scheme will include mitigation that will help restore the water environment to **increase the quality, naturalness and health of freshwater and marine bodies within the National Park** (page 38). The scheme would also include measures to improve the quality of road surface runoff before it is discharged back into the water environment. Proposed mitigation would also provide for the restoration of the loch edge through removal of existing structures to help offset the effects of the scheme. Watercourse crossings beneath the A82 would be improved by increasing conveyance capacity and improving on the overall hydromorphology of the watercourses.

Transport Scotland recognises that it has a role supporting the National Park with development of the **Visitor Hub in Arrochar/Tarbet** (page 75), in particular to **maximise connectivity between road, rail, active travel and water access** (page 75).

We can suggest there needs to be an encouragement for modal shift to rail to Balloch and West Highland lines. It is likely the main issue that would put people off from using rail is cost

and convenience, particularly for families where it will be generally cheaper to drive. It is also likely there is scepticism on the quality of services during summer months when demand is high and anti-social behaviour is also a known problem on that route. Active travel provisions on train carriages should also be promoted and the existing cycle booking needs to be made more reliable on Trainline and other ticket vendors.

Transport Scotland is currently working with the National Park in relation to the planning application for the Tarbet Visitor Site Masterplan to coordinate proposals for southbound bus stop provision on the A82/A83 as part of the proposed scheme and to provide a connection between the existing West Loch Lomond Cycle Path into the visitor site and to connect into the proposed extension of the cycle path that forms a key part of the A82 Tarbet to Inverarnan scheme.

The **A83 Rest and Be Thankful** scheme objectives are aligned with a number of the aims, objectives and actions outlined in the Draft Partnership Plan. Indeed the National Park were consulted when developing the scheme objectives. As such, Transport Scotland will continue to work with the National Park Authority to help deliver these aligned objectives, where appropriate, through the scheme as it progresses. This may include:

- **Living Well Locally** (page 98) –
  - Increasing resilience to the changing climate (page 102) – This is aligned with the scheme objective of resilience. The proposed scheme will by its function improve the resilience of the A83 through short, medium and long term interventions with due consideration of climate change.
  - Rural transport and active travel (page 103) – This is aligned with the proposed scheme objective of sustainable travel. The proposed scheme will consider opportunities to facilitate sustainable travel where appropriate.
- **Restoring Nature** (page 36) - This is aligned with the proposed scheme objective to protect the environment, including the benefits local communities and visitors obtain from the natural environment by enhancing natural capital assets and ecosystem service provision through the delivery of sustainable travel infrastructure.

The formal Environmental Impact Assessment (EIA) undertaken at the next stage of assessment will consider the likely impacts of the proposed scheme on the environment by comparing it with the expected conditions that would occur without the introduction of the scheme. The proposed scheme design will include necessary mitigation and where appropriate this will be developed considering the aims and objectives of the partnership plan.

Transport Scotland is ready to assist the Park Authority in relation to the action to develop a governance model in collaboration with responsible transport authorities and agencies (page 82) and is likely to be of assistance in your following outcome p 83: “Sustainable travel choices have been incentivised and enhanced through responsible public bodies collaborating on the operation and pricing of transport services, travel hubs and parking facilities”. We recognise that reaching the national target of a 20% reduction in car km by 2030 will require a broad combination of interventions, including infrastructure, incentives and disincentives, taking into account the needs of people in rural areas and people on low incomes to help ensure a just transition to net-zero. We commissioned research on equitable options for car demand management, including pricing to help inform the development of our own policy measures. Using the research findings, we will work with local and regional partners to develop a demand management framework by 2025.

### **Are there any challenges or barriers we need to overcome to help you do this?**

In respect of the **A82 Tarbet to Inverarnan** scheme, as the National Park Authority will be aware, Transport Scotland continues to progress the detailed development and assessment of the preferred option for the proposed scheme which will culminate in the publication of draft Orders and an Environmental Impact Assessment Report. This will afford the opportunity for stakeholders and members of the public to comment formally on the scheme

proposals. Depending on the level and nature of formal comment received to the draft Orders, it may be necessary for a Public Local Inquiry to be held to consider objections received and not withdrawn.

Delivery of the scheme can only commence once approved under the relevant statutory procedures and therefore it is noted that Transport Scotland is working to develop the scheme in line with statutory and legislative provisions. We remain committed to working with key stakeholders including the National Park Authority as we work to conclude the statutory procedures to enable delivery of the scheme.

Transport Scotland will continue to work with the National Park Authority and relevant landowners to explore opportunities to support its strategy for woodland planting in order to achieve the desired outcome while aligning with relevant statutory and legislative provisions. In respect of the **A83 Rest and Be Thankful** scheme, Transport Scotland continues to progress the development and assessment of the long term, permanent proposed scheme as it works towards the conclusion of the DMRB Stage 2 route options assessment and the announcement of the preferred route.

Delivery of the permanent scheme can only commence once the full DMRB Assessment process is concluded, and the scheme is approved under the relevant statutory procedures and therefore it is noted that Transport Scotland is working to develop the scheme in line with statutory and legislative provisions. We remain committed to working with key stakeholders including the National Park Authority as we work to progress the DMRB assessment process.

Similarly, for the medium term interventions we are working with key stakeholders to deliver these in line with relevant statutory and legislative powers.

This will include working with the National Park Authority, relevant stakeholders and landowners to explore opportunities to support the aims and objectives of its partnership plan in order to achieve the desired outcome while aligning with relevant statutory and legislative provisions.

#### **Can you suggest any other objectives or actions to help us meet our aims in each area of the Draft Plan?**

However there are no direct references to NTS2 which could be added alongside STPR2 page 131.

Similarly there could be a useful references to the Vision for Scotland's Public Electric Vehicle Charging Network on page 131 as well as route map for a 20% car km reduction by 2030 page 86.

#### **Can you suggest any other delivery partners needed to help deliver these?**

The Draft Partnership Plan identifies a wide range of stakeholders and delivery partners. Transport Scotland suggests that the role of Regional Transport Partnerships such as SPT and HITRANS is recognised alongside Transport Scotland and Local Authorities in the list of delivery partners on pages 84 and 110.

#### **Do you have any comments on the policies outlined in each area of the Draft Plan?**

In relation to 'Shaping a New Land Economy' page 44, could there be more in here regarding the use of land (in part) for climate adaptation? Land will play a key part in adaptation to current and future climate impacts e.g. mitigating flooding impacts on adjacent transport infrastructure.

No links are provided to climate resilience within the 'Low Carbon Travel' section p 79 – It is important the Net Zero infrastructure and travel options are resilient to the impacts of climate change now and in future. There is a linkage to this in the following section 'Greener Economy', specifically in relation roads infrastructure though.

Re "Policies for Enabling a Greener Economy and Sustainable Living – development and infrastructure investment" page 114: we would have expected to see something around climate adaptation, but perhaps this falls under 'tackling the climate emergency'.

In relation to "address private car use increases" page 86, you may wish to emphasise that discouraging car-use is also as important as encouraging alternative sustainable travel (as detailed as strengthening service support through a network of integrated hubs; walking,

cycling, accommodation of electric vehicle (EV) use, and public and shared transport and the facilities required to increase uptake). We understand that your action is mostly focused on car parking pricing. Using the research findings on car demand management, the Scottish Government will work with local and regional partners to develop a demand management framework by 2025. This may in turn support the National Park Authorities' above-mentioned action. You may wish to note that the Scottish Government has commissioned a ClimateXChange research on parking measures to reduce car use. We will share the report once completed later this year.

**Do you have any comments on the measures of success proposed? How can you help us to measure them?**

Net Zero target should be measurable with sufficient carbon emissions reporting. Transport Scotland undertakes monitoring and evaluation at both a national and project level. For example, Transport Scotland has a monitoring and evaluation framework to routinely monitor and report on progress towards the National Transport Strategy (NTS2) outcomes. For schemes such as A82 Tarbet to Inverarnan and the A83 Rest and Be Thankful, the Scottish Trunk Road Infrastructure Project Evaluation (STRIFE) framework is used for evaluation. Transport Scotland and the Regional Transport Partnerships could work with the National Park to discuss and agree effective measurements for Transport related outcomes. We also note and welcome that you will monitor private car usage to and within the National Park (page 87) to assess car usage reduction based on visitor survey. Have you considered setting a National Park's car km reduction target for car use from residents and visitors, to support the national target of 20% car km reduction by 2030?

### **Respondent 3**

#### **Sustrans**

We have agreed that it would be better to send a supporting comment with a few suggestions for this since active travel is such a central part of the draft. Please see this below.

Sustrans Scotland is supportive of the Draft National Park Partnership Plan 2024-29 and believes that this has a bold vision of 'Visitors and residents travel to, from and around the National Park using a well-connected and affordable system of public transport and active travel services, such as shuttle buses, waterbuses and cycle routes.' We are pleased that active travel is ingrained into the plan and is a part of many sections rather than an afterthought. In particular, we welcome actions to:

- Develop and deliver an active travel strategy that links up services and infrastructure as key parts of an integrated, connected multi-modal transport experience of the National Park.
- Develop better designed place connectivity between rail, bus and water transport services at Balloch which also promotes and enables active travel opportunities.
- Develop a maintenance programme for the most heavily used stretches of the core path network, informed by a path condition monitoring framework supported by volunteers.

- Develop new targeted seasonal transport services that provide a viable and attractive alternative to the private car to access popular National Park destinations.
- Establish active travel opportunities within and between communities to help more people meet their everyday needs by walking, cycling or wheeling as well as support health and wellbeing outcomes.

We note that the plan has links to national targets on climate change, planning and active travel, in particular suggesting one of the measures of success as 'Fully adopting and delivering the principles of the National Planning Framework 4 and ensuring that new development in the National Park takes a net gain approach to protecting and restoring nature on and around development sites.'

We also welcome the ambition to measure emissions reductions as well as the tracking of private car usage to and within the National Park and to decrease against 2019/20 visitor survey baseline of 79% of people travelling to the National Park by car. We suggest also tracking the number of people arriving through active travel modes and carrying out studies to see the number of women, people from ethnic minority backgrounds, and older and disabled people arriving by sustainable transport. Should these groups be under-represented in active travel use, we would suggest developing a strategy to reach people less likely to use active travel.

## **Respondent 4**

### **Individual response**

I have read all through this and at no point is there a mention of equestrian access or anything equestrian in any form – lots of photos of walkers or cyclists/bikes and there are worrying aspects mentioning reducing grazing, deer management and possible compulsory purchase.

I am very strongly against any form of strong arming someones land away from having suffered this myself at the hands of my local council – my greenbelt land being forcibly removed and it being described as vacant and derelict when it was used for grazing horses and wildlife projects are things that could easily happen to others.

You have to be very careful when its an outside body deciding if someones land is not being used and under no circumstances would I agree to a compulsory purchase being used and I think this aspect needs removed from any plan. If someone owns something and its not for sale then its not for sale and an unused piece of land is doing no harm it has in fact gone back to nature in most cases but if you don't own it already then you have no say in it if no harm is being done to the environment ie pollution or contamination.

I am concerned about reduced grazing – when I visit the countryside I like to see an animal whether that be a farm animal, a deer or a pony and I like that to continue, if farmers chose to stop grazing that's fine but no one should be forced. Farming has been here as long as nature has, so have deer and ponies. Intensive farming can be an issue and large sheds of battery farmed chickens are of course undesirable but a field with a few sheep on it then I see no issue with that and urban children need to see farming life as well as they need to see farmed trees and peatlands etc ....

Trees can go alongside grazing animals I see this every day on my own land and this includes the self seeding of them and many trees are mature in excess of over 200 yrs old on my land so I cannot see an argument where horses would have to be removed from land. I think provisions need to be put in place to protect the equestrian industry and pony trekking in the area

Ponies could be included in the walks for wellbeing =something I could perhaps be involved in myself if required

The whole park is virtually inaccessible on horseback due to man – they cannot access the west highland way nor the John Muir way in most parts so horses are not causing harm currently but I fear they would be further excluded and horseowners who own or rent land could be forced out by your proposals leaving the way for the droves of walkers and cyclists who do cause the harm to the environment – the ponies were walking this area long before the people came in their hundreds of thousands and the horse industry is a huge recreational area and business for those that live in the area so their needs should be included .

Ponies are also incredibly useful in regards to wellbeing and mental health - people do get very excited when they meet a horse out being ridden or in a field. I get told how it has made someones day all the time - thousands of kiltwalkers pass my field and they all love to see the ponies and have their photo taken with them as do many locals – urban children don't often get to be up close and personal with ponies - you only have to visit my ponies at one of their events – we do meet and greet events at local parks organised by local council.

Deer could be managed without a cull and I would not support a cull or a shoot to manage them - again it's very exciting to see a deer when you're out and about

I'm concerned about housing developments in the park whether they be affordable or otherwise – we visit these areas for their current look not to see housing developments – I'm not sure what is best to do about housing in these areas other than to stop purchases of second or holiday homes. I do feel people should only be allowed to own the house they live in and should not be allowed to stockpile but you cannot take homes away from people but you could perhaps stop the purchase of holiday homes only. Perhaps a governing body buys the homes for sale and then keep them till a local wants them then sell them on at that time.

All boats, jet skis could be electric or manual power only ie rowing, paddling but this may already be a rule

I agree that green jobs are required we also need more rangers on the ground and visible ranger patrols - these can assist with antisocial behaviour

More recycling and general waste bins which are emptied regularly

Perhaps electric car charging points are needed

Control of camping is required and litter - the rangers can assist with this as they are probably needed in pairs for safety esp if asking people to put out fires and pick up rubbish

Better surfacing is required to allow more users as if you are excluding horse riding access you are more or less excluding wheelchair access - if a horse cant use the path then neither can a wheelchair in many cases and certainly in my experience

Better access for horse riders is needed – more suitable surfacing

Carparks need to be accessible to horse boxes

I am ok with increasing wetlands and peatlands as long as no one is forced off their own or rented land

Groups that could help

british horse society – they can help with funding for off road access for horses

horse Scotland is another group that could perhaps provide input or assistance

local affiliated riding clubs – gareloch riding club is one and strathendrick is another in the area

local equestrian businesses - livery yards or riding schools or trekking centres

I have printed it off to have a more through look but these are my thoughts so far

## **Respondent 5**

### **Individual response**

Herewith my comments on the NPPP. They are of course personal, but written with the background of my views on the economic development of Strathard.

To set the scene, Strathard, probably along with many other parts of the Park, has been in long-term decline for many decades. As has been observed, a visitor arriving in the 1950s could have been brought here by train, and this would have connected with a local bus service which would have transported them within the community area. Aberfoyle would have had a GP practice, and shops providing many everyday items, many of which one now has to travel to Stirling or Glasgow to obtain. There were two banks represented in the village. Outlying communities such as Stronochlachar thrived, with a good community spirit. Today, none of these things are true - the one remaining bank branch in Aberfoyle is due to close next month.

Over the years, much of government policy has encouraged this decline, whether intentionally or not, and certainly, whatever is stated in plans such as this, in recent decades nothing has been done to reverse this process.

This document places a heavy emphasis on climate change, zero carbon development, and restoring nature, with reversing depopulation and economic development coming a poor second. No doubt this reflects government policy laid out in the Scottish Government's National Planning Framework 4, but it puts the cart before the horse. There is a multitude of evidence that it is a prosperous private sector which leads the way in developing 'green' projects. Unless the Park can create that prosperous private sector, such projects are doomed to fail. To succeed, the plan should be focussing on ways in which economic development, from which increasing the population will follow, can be done in a sustainable, zero-carbon, manner.

There is essentially a lack of leadership within this document. It is easy to list what is going wrong - I have done it myself - and to write down a vision of where things ought to be heading, but simply listing all the possible government agencies - and there are lots of them - which might have a role in changing things is not good enough. Perhaps the Park eschews any leadership in these matters. But a start might be made by nominating - perhaps after 'partnership' discussion - a particular agency to lead on the implementation of any particular part of the plan. For example, Transport Scotland should be required to write and implement the plan for low carbon travel to and within the park. (And the obvious, low-cost, low carbon version of a railway to travel within the park is an aerial one - a cable car.) Perhaps visitors should be encouraged to use public transport within the park by charging a toll on its roads.

It is axiomatic that the purpose of a park is to provide a place where visitors can seek respite from the daily grind by enjoying recreation in beautiful surroundings. This is not explicitly stated, but perhaps it should be, to remind planners of what their core responsibilities are. It follows that there should be good transport links - which there presently are not - and a thriving hospitality infrastructure, including places to stay and places to eat, well-served by properly trained staff, to cater for visitors. Increasingly, these visitors come from greater distances, many now from abroad. It also follows that the place should be kept clean, tidy, and well maintained, which it is not. Thus are the people who live and work in the park let down by our government, local or national.

The plan rightly draws attention to the two over-riding problems faced in our community: housing and transport. I am of the view that the high prices of housing are entirely due to a chronic shortage - the law of supply and demand. This applies across all sectors, from the first-time buyer in the 'affordable' sector, through the 'middle management' sector, to the high end sector, and of course including the retirement sector. (This, in effect, is a type of inward investment.) The same goes for tourist accommodation. In Strathard, the principal factor, other than wider government policy, is a shortage of land, and the fact that very little land is not in state ownership. There is nothing in the plan to change this.

I have highlighted elsewhere the problem of lack of land in private hands. There is no entrepreneurial culture in a risk-averse public sector. This means there is no incentive to develop our visitor experience, be it in accommodation, including provision for camper vans, for other sources of hospitality wealth creation, such as a variety of eateries, and for developing things for visitors to do (and spend money on). It is certainly an aspiration in Strathard to develop longer-stay holidays as a better way of creating wealth other than simply catering for day trippers, but there is no mention of this in the plan, and it would certainly require development of all these things.

There is a reference to training, particularly in rural skills, which is to be welcomed, and perhaps SRUC could be encouraged to open a campus within the park. The problem with this is that there is a great deal of investment towards developing machinery to improve the efficiency of the rural economy by reducing the labour content. Another area of training is in the hospitality sector. Training for this at Forth Valley College should be encouraged at schools, and taught that this is a profession with a recognised career path, not just a holiday job for students.

There is an emphasis on infrastructure investment which is to be applauded. Much of our infrastructure was laid out in Victorian times, and is quite unable to cope with modern life. Modern infrastructure is important in enabling transport, including cars, to function efficiently and so achieve its low-carbon potential. But infrastructure is not limited to transport. Well laid out walking and cycling paths, ideally tarmac-ed, would be instrumental in reducing erosion, a subject not mentioned in this plan, and 'shaping' visitor behaviour patterns. Consider Switzerland: mountain erosion is reduced by building a cable car to the top, and putting a restaurant there, and the mountains are criss-crossed by good walking paths (Switzerland also has an excellent joined-up transport system!). This has the additional advantage of allowing the less mobile to appreciate the views at the top. (In more ancient times, the Chinese simply built a staircase.) The problem with infrastructure is that it needs to be funded, and there is no suggestion in the plan for achieving this.. Can the public sector manage this? Probably not, but how can policy be developed to encourage the private sector to do so? The plan has nothing to say about this.

These comments come from a high-level overview, but that is what a strategic level document is all about. While a vision of bringing about change to improve the climate, zero carbon development, and restoring nature, is important, there is little in the document to say how this is to be achieved, other than 'partners' - by which I assume is meant the plethora of government agencies - working together. Is the park either powerless or frightened of using whatever powers it has? Either way, this document would be much improved by describing how the park envisages achieving its aims.

## **Respondent 6**

### **Stirling Council**

### **Restoring Nature**

#### **Aims & Objectives**

Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?

- To increase the number, species diversity and health of trees across suitable areas of the National Park.
- To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate change and be nature-rich environments.
- Expand and improve priority habitats and enhance connectivity between habitats and eco-systems across the National Park to create functioning nature networks.
- Develop improved monitoring and reporting to measure progress in nature restoration.
- To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs
- To develop funding support opportunities that help deliver wider public benefits from our land, including for climate and nature.

What role can you play in delivering these objectives or actions?

- Stirling Council is committed, through its Climate & Nature Emergency Plan and Alive with Nature Plan, to enabling the planting of 1,000,000 trees by 2045 and restoring 3 peatland sites by 2045.

Are there any challenges or barriers we need to overcome to help you do this?

- Resources, financial and people, as well as skills and capacity.

Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?

- Need to consider the market availability of tree and indigenous species with appropriate provenance of seed to be able to meet tree planting ambitions.

#### How do we measure success?

Do you have any comments on these proposed measures or any other suggestions?

- Need to measure Carbon emissions at both schedule 1&2, as well as level 3
- Under trees, you could monitor the tree canopy, particularly within settlements and along watercourses.

How can you help us to measure them?

- The University of Stirling has developed a methodology where artificial intelligence programme can assess the tree canopy from aerial photography.
- We are developing a public app to help monitor tree planting

#### Policies for Restoring Nature

Do you have any comments on the policies for Restoring Nature?

- Stirling Council are keen to be involved in the network management and ensure that the Forth Climate Forest links to all endeavours

Who needs to be involved in Restoring Nature?

- All those listed in the survey.

#### **Creating a Sustainable, Low-Carbon Destination**

##### Aims & Objectives

The Council is concerned that the objectives are not SMART, this makes the thread of the document quite difficult to follow through to indicators. The objectives here would benefit from being specifically targeted at achieving some of the high level aims and themes discussed to tie the narrative together which then would directly feed into the indicators/measures suggested.

Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?

- Sustainable Visitor Economy, Inspiring Action for Nature and Climate

Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?

- Multi-year Place Programme, Visitor Hubs, Recreational Path Network

Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?

- Whole System Approach, Incentivising Sustainable Travel Choices , Developing a Rural Transport Sector

What role can you play in delivering these objectives or actions?

- Coordination of sustainable transport planning, support bids for transport funding, incorporate National Park ambitions to link into Council's emerging Active Travel Strategy.
- Assistance and guidance on identifying transport solutions through to implementation.

Are there any challenges or barriers we need to overcome to help you do this?

- Available staffing resources will always be a challenge to assist with this along with having the required level of funding/budget available.

Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?

- There is room for a specific action on delivering active travel infrastructure here – appreciate aspirations are there for improving the recreational path network but having something more specific around delivery of walking, wheeling and cycling links will be advantageous to securing funding in future.

How can we measure success?

Do you have any comments on these proposed measures or any other suggestions?

- The associated objectives need to be clearly defined and KPI's linked to the individual objective. The measures need to be measurable and time bounded, i.e. SMART, which some of these are not.
- To measure success a baseline will need to be stated.

How can you help us to measure them?

- Public transport patronage data can be shared for those services that are financially supported by the Council.
- The Council is willing to have a conversation on traffic/active travel counters in the area.

Policies for Creating a Sustainable, Low-Carbon Destination

Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?

- We welcome the focus on sustainable travel.
- Needs to be aligned to the current National Planning Framework (NPF4)
- The Council has experience in developing low carbon hubs

Who needs to be involved in Creating a Sustainable, Low-Carbon Destination?

- Working groups will need to be established with the relevant officers from key stakeholders. This would not be limited to officers of the Council, but also representatives from location transport providers (including active travel).

**Enabling a Greener Economy and Sustainable Living**

Aims & Objectives

Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?

- Transition to a greener economy, Low-Carbon Businesses,

Which of the objectives on Living Well Locally can you or your organisation help to deliver?

- Low carbon local living, Increasing resilience to the changing climate, Rural transport and active travel, Community influence and place making

Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?

- Identifying development needs and opportunities, Delivering positive local outcomes.

What role can you play in delivering these objectives or actions?

- Support closer working between the public sector, land managers and communities to grow the green economy. Support improvements to digital infrastructure. Working to deliver the Food Growing Strategy. The Council's work to create community resilience plans.
- Rural Transport and Active Travel – assistance with implementing sustainable transport solutions including infrastructure.
- Ensuring developers are held to NPF4 standards regarding transport and new developments.

Are there any challenges or barriers we need to overcome to help you do this?

- Available staffing resources will always be a challenge to assist with this along with having the required level of funding/budget available.

Can you suggest any other objectives or actions to help us meet our aims for Enabling a Greener Economy and Sustainable Living?

- Although Net-zero is a measure of success, this needs to be clearly defined as an objective.

How can we measure success?

Do you have any comments on these proposed measures or any other suggestions?

- These need to be SMART

How can you help us to measure them?

- Happy to work with the national Park on measurement systems

Do you have any comments on these proposed measures or any other suggestions?

- Would be interested to understand how the NP aims to get to net zero by 2040.
- Who needs to be involved in Enabling a Greener Economy and Sustainable Living?

All those listed.

Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?

- Sustainable Visitor Economy

Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?

- Visitor Hubs (Callander)
- Partnership approach to visitor management

What role can you play in delivering these objectives or actions?

- Sharing insights, collaborating on research, contributing to working groups. Sharing comms and destination marketing messaging and continuing to work closely on this to ensure joined up, co-ordinated approach.
- Targeted destination marketing campaigns that look at sustainable and climate aware experiences in the area could be developed between us (largely using existing content and assets). Connecting these to key centres like Glasgow, Edinburgh and Stirling as part of the visitor journey will help illustrate the whole journey.

Are there any challenges or barriers we need to overcome to help you do this?

- Stirling Council and the NPA could work better together when it comes to research and insights work and connecting projects happening outwith the NPA area with the potential beneficial effects it could have on projects within the NPA. In the first instance, an officer group focussed more on comms and economic development could help ensure were all sharing great work and can collaborate and share resources more. Closer working with VisitScotland on this will help a great deal, but this needs to be focussed on delivery.

Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?

- n/a

**Respondent 7:**

**Steamship Sir Walter Scott Trust**

On behalf of Steamship Sir Walter Scott Trust, which is responsible for managing recreational facilities and preserving the historic steamship for the enjoyment of the public at Loch Katrine in the heart of the National Park, I am writing to submit some brief comments on the National Park Plan. I tried to submit some comments via the various questionnaires and interactive map but they were obviously shut down at the 5pm deadline today as when I couldn't access them I was advised the consultation had closed. I trust the comments below will be taken into account despite this note being submitted beyond the 5pm deadline.

We consider that in addition to the nature and climate crises identified in the introductory section of the plan the current **people crisis** should strongly feature as well to bring more balance back to the focus of the final plan. While some people related topics are covered later in the plan it fails to recognise there is a serious people crisis with record levels of obesity and mental health illnesses which was not helped by COVID 19 and the restrictions on outdoor recreation in areas such as the National Park. Given the National Park is within easy reach of half the population of Scotland and one of the key aims of the National Park is *to promote understanding and enjoyment of the special qualities of the area by the public* we would like to see more policies and actions relating to outdoor recreation. We are disappointed very few of the actions identified in the draft Outdoor Recreation Plan, that was the subject of an extensive consultation programme several years ago and was subsequently sidelined, have made it into the draft Partnership Plan.

We believe there is a strong case on to have more of a focus on contributing to the health and well-being of the nation through the promotion and development of recreational opportunities and facilities in the National Park and we see ourselves as being a partner who can make a positive contribution here in the heart of the National Park where we introduce more than a quarter of a million people annually to the special scenic, cultural and recreational qualities of the Loch Katrine area.

We are disappointed that in the section of the plan that features recreation the emphasis is on maintaining existing facilities and there is no mention of capitalising on additional opportunities which the National Park and other partners can help deliver. Good examples of this are completing some of the strategic gaps in family friendly path missing links. Here in the heart of the Trossachs there is an opportunity to develop a safe family friendly off road link for cyclists and walkers between the end of the Callander cycleway near Loch Achray and the the shore cycleway at Loch Katrine. There are landowners and partners willing to work with the Park Authority to deliver this and thus contribute to strengthening safe active travel opportunities in the National Park. There are other examples over on Loch Lomondside (Loch Lomond Skyline Trail proposal) and in Breadalbane (Killin-Crianlarich Cycleway proposal) and they could be delivered in the next 5 years with funding from SSE and support from local organisations and landowners who would like to see bold initiatives such as these featuring in the final Partnership Plan. If the Park Authority is serious about switching more people from cars to active travel options it is important that there is investment in improving and extending active travel opportunities in and around the National Park with some of the missing links featuring as priority projects.

There is quite an emphasis in the draft Plan on reducing travel to the National Park by car for recreational visits with an emphasis on using public transport as an alternative. We have serious reservations about this on several grounds.

Firstly, there are many parts of the National Park such as here at the heart of the Trossachs where there are no public transport links and little prospect of there being any soon despite the well meaning but abortive efforts of the National Park to introduce pilot services over the last two years with two failed tendering processes for various reasons including a shortage of bus drivers. In Victorian times Loch Katrine was well connected with over 30 integrated public transport tour options which enabled visitors to come to the area on a day visit from

major population centres. Sadly, this is no longer possible with no public transport links. We would like to explore the possibility of a partnership between the Steamship Trust, local communities, Stirling Council, the Park Authority and local bus operator/s to have a further try at delivering a much need public transport service linking Callander, Loch Katrine and Aberfoyle.

Secondly, we consider car borne visitors to the National Park are being unfairly singled out and wrongly identified as the largest polluters/carbon emitters in the National Park. While we have no access to the carbon footprint data produced for the the National Park Authority-we have searched on the NPA website for this with no success- we understand it fails to take account of traffic using the trunk road network to pass through the Park along the busy A82, A84/A85 and A811 which we suspect, along with farm animals are much bigger polluters. Also no account is being taken of the changes taking place in the types of cars coming to the Park with an increasingly high percentage being low carbon emitters with more and more people buying electric or hybrid cars. We appreciate this doesn't chime well with the narrative in the draft Partnership Plan which underpins a drive to reduce leisure trips by car expressed at various places in the draft Plan. However, it is important there is a more accurate picture presented on the impact of this sector with a more complete carbon footprint document that takes account of through traffic, farm animals, etc. Also it is important the Park caters more for electric cars with a more extensive network of electric charge points at various locations around the Park. We would suggest there is an ambitious 'Electric Park' initiative and this should feature in the final Partnership Plan. Various private and public sector partners could contribute to this.

We recognise the importance of the drive to a carbon zero Park and, along with many other tourism businesses throughout the Park, we are making a major contribution to this with plans to use hydrogen vegetable oil fuel (HVO) to power our fleet of boats including the steamship. The net tonnage of carbon emission reductions from our fleet of ships will exceed 90% when we implement this and it is worth noting this will far exceed the carbon reductions the National Park Authority is aiming to achieve as an organisation by 2030. All that is holding back full implementation of the switch to HVO is recent growing divergence in the price of this fuel compared to other fuel types and we are lobbying Governments to address this disparity and would welcome the support of the NPA. There is no reason why all the fleets of passenger vessels operating in National Park lochs could not transfer to HVO when, and if, the fuel is available at the right price level as this would make a major contribution to carbon footprint reductions at a stroke.

While we appreciate the Park Authority wishes to elevate the discussion on the nature and climate crises it is essential in our view that the original aims of the National Park are not unduly diluted and specific actions to support outdoor recreation, cultural heritage and social and economic development are strengthened and expanded in the final version of the Partnership Plan. We would like SMART objectives to feature in the final Plan too as the current draft is quite open ended and lacking in specific actions and targets in several sections. There is also no indication of scale of resources required to deliver the plan. We look forward to seeing a much strengthened version of the Plan at the next stage and trust the comments above, which are meant to be constructive, will be considered and taken account as the plan is developed further.

## **Respondent 8:**

### **Scotways**

ScotWays supports the over-arching vision, key themes and objectives set out in the National Park Authority's (NPA's) draft National Park Partnership Plan (NPPP). In particular, we welcome the NPPP's emphasis on (1) active travel and sustainable transport to, from and within the Park and (2) local living within the Park, which align with the Scottish Government's national objectives. We also support the draft policy framework and associated actions that have been formulated to facilitate achievement of the Plan's objectives.

However, ScotWays considers the NPPP is light on specifics, notably in terms of the funding sources the NPA intends to exploit to deliver its objectives, particularly the financial resources required to construct the infrastructure necessary to create a truly sustainable transport network to, from and within the Park; the greatest barrier to the Park becoming a Sustainable, Low Carbon Destination. The Plan also lacks clarity on how the NPA envisages the proposed partnership process will operate in practice, particularly in the absence of discrete projects or initiatives. Generally, we would expect the NPA, as the author of the Plan, to provide direction and leadership and, where appropriate, resources to realise its objectives. ScotWays assumes the required detail will be provided in lower level delivery plans, such as the Local Development Plan and a specific, outdoor recreation-focused plan or equivalent, but would welcome confirmation of this.

ScotWays recommends the Plan refers to the provisions of the Land Reform (Scotland) Act 2003 and the associated Scottish Outdoor Access Code, as tools which would help achieve the objectives of a modal shift to sustainable and active travel and managing visitor pressure within the Park. In addition, we request that the duties placed on the NPA by the 2003 Act be specifically referenced within the NPPP. Increased and more effective and targeted promotion of the Code and access rights at popular visitor destinations will help visitors to understand more clearly where they can walk, wheel or ride, whilst keeping the need to behave responsibly at the forefront of their minds. Furthermore, ScotWays wishes to emphasise that the Plan should recognise the achievement of a modal shift to sustainable and active travel and more local living will require not only the sustainable management, maintenance and promotion of the West Highland Way and the Park's Core Paths network, but also increased investment in the development, maintenance and management of new and upgraded active travel linkages and local paths networks between and within communities.

The day-to-day work of ScotWays primarily involves providing advice on specific outdoor access and rights of way issues. In that respect, we value greatly the working relationship we have developed with the Park's access team and, provided we have capacity, remain keen to support the work the Team does to resolve access disputes and implement wider access initiatives within the Park. In this way, ScotWays would be happy to contribute as a partner body in delivering the aims of Creating a Low Carbon Destination and Enabling A Greener Economy And Sustainable Living.

I hope the above comments are helpful and look forward to learning the outcome of the NPPP consultation process, in due course.

## **Respondent 9:**

### **Scottish Water**

Thank you for contacting Scottish Water and sharing the Draft Loch Lomond & The Trossachs National Park Partnership Plan 2024-2029.

I am pleased to see the plan addresses goals and activities across many key aspects of nature, water quality, and access & recreation that we would both support and be able to actively contribute towards. The 2045 vision for a climate-resilient place where people and nature thrive together is one we would strongly support.

The plan rightly identifies Scottish Water as a key partner in the plan and I know we have previously been engaged in the review of the current park plan, and in the development of this plan.

Our principal interest in the area is focussed around the Loch Katrine catchment and associated water systems which provide drinking water for much of Glasgow. As you will be aware we own around 9,500 hectares around the loch that is leased long-term to Forestry and Land Scotland.

Through this (and other partnerships) we have a number of initiatives underway or in development that will make a positive contribution the many of the goals and actions identified in your draft plan.

The Draft 10-year Land Management Plan for the Katrine estate is currently awaiting approval from Scottish Forestry and will direct activities that will see a significant improvement and contribute directly to the restoring nature, resilience and carbon goals of the plan. The National Park was a key stakeholder in the development of this plan which will see:

- The creation of 4,600 hectares of extensive native woodland through a combination of planting and natural regeneration that will contribute to the afforestation goals of your plan (led by Forestry and Land Scotland);
- Restoration of peatland across the estate. We are finalising survey and scoping work across the estate, which is showing that some areas are in much better condition than expected, but there will still be several hundred hectares of restoration to deliver. We expect to begin restoration later this year and would be pleased to share full details of our work;
- New access tracks to support sustainable recreation which we would be keen to discuss further with you;
- An expected improvement in biodiversity of around 40% across the estate (as assessed using a biodiversity metric developed with NatureScot);
- We would be keen to discuss delivery of this plan with you, following approval from Scottish Forestry.

We would very much welcome further engagement to discuss some of the proposals on visitor management and water-based recreation within the plan. We are keen to continue working with you to encourage responsible access for leisure and to facilitate enjoyment of the natural environment on the land and water we own within the park. Our aim is to engage and educate,

contributing to our aim of connecting communities with our assets which aligns well with the goals of your draft plan.

Both organisations are actively involved with Water Safety Scotland and we hope to explore ways we can work together to support water safety messaging in the Park.

In terms of helping promote sustainability and healthy living, you will be aware Scottish Water has already installed seven free water refill taps in Loch Lomond & The Trossachs National Park – at Aberfoyle, Balloch, Balmaha, Callander, Drymen, Stronachlachar Pier, Trossachs Pier and Rowardennan. These taps are designed to benefit both the local and wider environment by reducing litter and helping address the environmental impact of single-use plastics such as water bottles – as well as keeping people hydrated on the go. We are seeking planning permission for a further two Top up Taps in Luss and in Crianlarich.

Scottish Water is contributing to the funding for a project officer to support the management and development of The Great Trossachs Forest National Nature Reserve up to January 2025 – focussing on habitat management, partnership working, lifelong learning and people engagement. It would be useful to explore how this can be developed within your plan and how we can work together to promote our shared goals and ambitions.

I know Scottish Water and Park staff are planning to meet to discuss some of the technical aspects within the draft plan covering water management, biodiversity and recreation. I look forward to hearing the outcome of this and to Scottish Water playing its part in supporting the plan once it is finalised.

## **Respondent 10:**

### **Scottish Rewilding Alliance**

Thank you for the opportunity to respond to the Loch Lomond and the Trossachs Draft National Park Partnership Plan 2024-29. To tackle the continuing decline of nature, we need bold action and ambitious targets from our national parks. Rewilding must be included alongside more traditional methods for conserving and restoring nature.

We welcome the Park's commitment to the restoration and recovery of nature by 2040, but we believe this cannot be achieved without embracing rewilding on a significant scale. Cairngorms National Park [CNP] has set the target that by 2045 at least 50% of the park will be managed principally for ecological restoration. We believe that 50% should be the minimum target for Loch Lomond & the Trossachs National Park [LLTNP] too. We are calling for Scotland to be the world's first Rewilding Nation - and both of our national parks are key to achieving that vision.

The Scottish Government's Chief Scientific Adviser for Environment, Natural Resources and Agriculture recently endorsed a definition of rewilding that can be used by the Scottish Government and the wider public sector.

*“Rewilding means enabling nature's recovery, whilst reflecting and respecting Scotland's society and heritage, to achieve more resilient and autonomous ecosystems.*

*Rewilding is part of a set of terms and approaches to landscape and nature management; it differs from other approaches in seeking to enable natural processes which eventually require relatively little management by humans. As with all landscape management, rewilding should be achieved by processes that engage and ideally benefit local communities, in line with Scotland's Land Rights and Responsibilities Statement, to support a Just Transition.”*

<https://www.gov.scot/publications/defining-rewilding-scotlands-public-sector/>

We believe that the national park has the capacity to create resilient and autonomous ecosystems while benefiting local communities through the large-scale rewilding of the park. The stated aim of the park is “to maximise the benefits that can be provided for nature, climate and people”. Rewilding can reverse the continuing decline of nature. It can help us adapt to climate breakdown. And it can bring fragile rural communities back from the brink. All over Scotland, rewilding projects are restoring ecosystems and creating significant benefits for people. Rewilding is also popular: in an opinion poll for the Scottish Rewilding Alliance carried out by market research agency Survation in 2022, 74% of Scottish people agreed with the call to make national parks wilder, with just 6% of people opposed.

Despite this groundswell of rewilding in Scotland, despite the existence of a definition of rewilding for Scotland's public sector, despite its proven benefits, despite rewilding's enduring popularity and despite the fact that it offers a cost-effective way of managing large

landscapes, the draft plan does not mention rewilding. Rewilding could help create the national parks we should have – places where wildlife can thrive, carbon can be locked away as nature recovers, and where people can have genuine contact with wild nature alongside fresh, nature-based economic opportunities.

We provide specific responses to the Restoring Nature, Creating a Sustainable, Low Carbon Destination and Enabling a Greener Economy and Sustainable Living plans below.

## **Restoring Nature**

LLTNP's conservation efforts have successfully preserved threatened habitats and species, including red squirrels, wading birds, new woodlands, and water voles. However, damaging land use activities have outweighed these efforts, with a quarter of features in Sites of Special Scientific Interest within the National Park not in a favourable condition. The coming years will be challenging for Scotland's nature due to an increasingly erratic climate and declining biodiversity, threatening the stability of our ecosystems.

Rewilding offers a way to kickstart natural processes within the national park area, leading to more resilient habitats that can support a diverse range of species. This can offer a more sustainable way to manage large areas for nature, climate and people.

We welcome LLTNP's target of increasing the annual rate of woodland creation and their pledge to encourage and support more proposals that deliver healthy, diverse woodland. However, these targets are neither detailed nor ambitious enough. By contrast, the CNP aims to create a minimum of 35,000ha of new woodland by 2045. Of this total, a minimum of 80% will be native woodland and 10,000ha will come through natural regeneration rather than planting. Next to that, LLTNP's ambitions to increase annual planting from 200ha per year to 400ha per year look less than impressive. We call on LLTNP to work with Forestry and Land Scotland (who manage 40% of the park's area) and other land managers to set clear and ambitious targets for woodland creation, and ensure that an overwhelming percentage of this total is achieved through native tree planting and natural regeneration. Allowing native tree cover to regenerate naturally is more cost-effective than tree planting and creates more dynamic, varied woodland habitats, boosting biodiversity.

Whilst welcoming LLTNP's target of increasing the annual rate of peatland restoration, and the ambition to restore 8,000ha by 2030, we ask the park to specify their 2045 target for restoration.

We ask LLTNP to go further than merely tracking the ecological status of its water bodies. In an environmental crisis they must either match or exceed CNP's target and ensure that at least 70% of its rivers are in good ecological condition by 2045.

With beavers both present in and within range of the park already, we call on LLTNP to play a less passive role in the restoration of this keystone species. Beavers in prime agricultural areas of Tayside are currently being culled, or else moved to enclosures in England. Losing them from Scotland is a tragic waste, especially when they could easily be relocated to vacant, suitable sites within LLTNP instead. Reintroducing beavers to river systems means that the land holds more water and can host more species. It is both cheaper than engineering solutions and lends itself better to restoring the dynamic processes on which ecosystems depend. We call on LLTNP to follow the example set by CNP and facilitate the restoration of this species to suitable sites within the park's area. By working with land managers to identify suitable translocation sites and then leading on consultations to bring beavers to those places, LLTNP can achieve many of its nature and climate goals.

Where necessary, CNP has pledged to consider reinforcing existing populations of declining species and reintroducing lost species as part of a suite of measures to restore biodiversity. With wildcats being successfully released within CNP this year, and the park authority facilitating the restoration of beavers to its waterways, it is taking a bold lead on species recovery. We call on LLTNP to keep pace with its sister authority.

With species such as golden eagle breeding within the park, we ask LLTNP to develop specific action plans to increase home range occupation and breeding success for priority species.

We ask LLTNP to follow the lead of CNP by ensuring that all pheasant and partridge shoots are sustainable and do not negatively impact upon native biodiversity. As part of this strategy, baselines should be established for the number of non-native game birds released within the park annually.

### **Creating a Sustainable, Low-Carbon Destination**

Connection with nature is a key part of our call for Scotland to be a Rewilding Nation. We agree with the park's vision - "to transform the National Park into a more sustainable, low carbon destination." However, this will require bold decisions. These decisions will not always be popular at first.

People come to the park to see Scotland's incredible natural beauty. At present, even our national parks have fragmented habitats, with intense demands being placed on a small number of sites. By rewilding large areas of the park and allowing nature to create diverse, dynamic habitats, visitor demand will be more evenly spread across the park area.

Rewilding projects across Scotland are exploring novel ways for communities to connect with nature. The national park and conservation charities within the park are well-placed to build on their history of involving people in nature by ensuring that the wilder national park is truly for everyone.

### **Enabling a Greener Economy and Sustainable Living**

National parks are well placed to create greener economies, with their ability to work collaboratively across a large area and champion ideas and initiatives. The park should focus on incentivising nature-based businesses that work with nature, not against it. In order to enable this, we need a greater focus on green jobs and the required skills. This could be an area where the leadership abilities of the national park could make a real difference.

Communities should also be empowered to take action to restore nature and rewild, leading to the creation of more nature-based businesses as opportunities arise for local people.

### **About the Scottish Rewilding Alliance**

The Scottish Rewilding Alliance is a collaboration between like-minded organisations who share a mission to enable rewilding at a scale new to Scotland.

Our approach embraces working in partnership with landowners, communities, interest groups and government to achieve a shared agenda that shapes the landscape.

Our goal is a flourishing ecosystem, supporting self-sustaining nature-based economies which secure a future for local communities.

## **Respondent 11**

### **Scottish Enterprise**

I believe the draft National Park Partnership plan is a well drafted and compelling document which sets out clearly the positive contribution the National Park can make to the visitor economy, wellness and biodiversity of Scotland but equally spells out the inevitable challenges that flow from the sustainably managing an area that attracts 4 million visitors per year.

As discussed when we spoke a couple of months back, Scottish Enterprise is currently in the process of updating our own corporate 3-year plan to reflect a range of policy/strategy guidance including the National Strategy for Economic Transformation and the recently published Innovation Strategy. The plan will be published in the Autumn and will provide focus to SE's role in driving innovation, investment and international trade to general sustainable and inclusive economic growth.

I can see a number of areas where there is potential for SE to contribute to delivery of the National Park Partnership Plan, particularly in support of companies to transition to more sustainable business models thereby supporting the development of the rural economy. As you know we are also keen to promote the development of our land holdings in Balloch to strengthen the location as a strategic visitor hub for the Park.

As you have commented, in the past our two organisations have worked closely together, and I look forward to maintaining that spirit of collaboration into the future and look forward to catching-up with you soon.

## **Respondent 12:**

### **Individual response**

**Page 79.**

#### **Low Carbon Travel for Everyone.**

The most efficient form of public transport is the train.

LLTNP should work with Scotrail to launch a revitalised train service from Glasgow Queen Street to Balloch. Queen Street Station could have large posters (like at Glasgow airport) of photos of the LLTNP. Every station along the line should be brightened-up with large photo posters. Every train should have a BTP guard who knows about the LLTNP, to encourage people to look after the National Park by explaining how special it is.

It is vital that we improve this service if the LLTNP are serious about transformation of travel.

Ardlui station – LLTNP work with West Dunbartonshire Council to renovate the Ardlui Outdoor Sports Centre. This could become a destination for days out.

**Page 33.**

#### **Restoring Nature.**

'20% of Designated Sites are still in unfavourable condition' – it is vital that we safeguard and improve what we have – development for access should be limited and never to the detriment of that site.

LLTNP planning must consider the impact of any development in and beside a Designated Site by automatically requesting an EIS. These should take into consideration the cumulative effect of every previous application on the site.

Serious errors have been made by LLTNP where planning should never have been given – Tyndrum Gold Mine for instance – makes a mockery of peat restoration.

'High livestock and deer pressures negative impact on many of our rivers trampling leading to erosion of banks washing soil into water bodies.' Beavers will do more damage to the riverbanks than cattle or deer.

INNS – support Councils to identify and eradicate invasive species. Publicise the problem to the public so they can get on board and help.

Retain the desire to protect quiet places which was in the previous Partnership Plan.

Water.

LLTNP work with Scottish Water to upgrade WTPs.

Install water disposal points across the LLTNP to service Camper Vans and Caravans, work with stakeholders, particularly LFS and Councils.

Increase the number of public toilets.

Prohibit further large scale development unless there is access to a WTP.

BAN bleach in the LLTNP.

## **Page 70.**

### **Improving popular places and routes, services, information and infrastructure.**

'needs to improve to reduce the impact of visit' – provide the facilities and the impact will be far less. Ban wild camping, like Austria and Switzerland and provide more affordable serviced campsites.

Support the regeneration of Balloch Castle Country Park which has high visitor numbers and zero facilities. The capacity to absorb many more visitors will be there as Balloch Park improves. Days out in Balloch Park with the access to Whinney Hill need to be encouraged.

Outdoor education for children from Glasgow and WD can be provided in Balloch Park, transport by train available to all.

Balloch Castle Country Park is the gateway to the LLTNP (so says Dom Hall from LLTNP) – please keep the commitment that was in the last Partnership Plan to support the regeneration of Balloch Castle Country Park.

## **Page 98.**

### **Living Well Locally.**

Page 100 shows new housing in Balloch – LLTNP gave permission for this housing within WDC on a GREEN FIELD site. Less than half a mile away there is a vacant site suitable for around 80 houses.

The emphasis from the LLTNP has been on Tourism and properties for self-catering to the detriment of local people who want to build homes to down-size. This has happened several times in and around Gartocharn so must have been repeated across the LLTNP. I think there is a change of tune now but, LLTNP have created a problem through planning decisions.

## **General Comment.**

If any progress is going to be made the LLTNP needs to make the effort to go to Councils and not always expect Councils to come to you.

For example, the pre-season visitor stakeholder meeting was held at 2.30pm ( maybe 3pm) on a Friday afternoon. That does not feel like trying to engage with stakeholders.

Please do not encourage further development of paths or cycle routes unless the maintenance funding is there. Too many capital developments have taken place with no-one specific 'owning said project' and no funding to maintain the project.

Consider the impact positive/negative of dis-banding the LLTNP and absorbing the positive parts into Councils.

By creating a National Park a honey-pot has emerged, putting pressure on local people and the environment; this is the result of years of putting Tourism before the Environment.

## **Respondent 13**

### **Rural Stirling Housing Association**

Please see response below of behalf of Rural Stirling Housing Association to the above. I have used the questions below to frame our response as requested:

- **Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver?** Enabling a Greener Economy and Sustainable Living
  - **What role can you play in delivering these?** We can supply more affordable homes through new build development for social rent, alternative tenures such as Mid-Market Rent and New Supply Shared Equity and through Section 75 Agreements with Private Developers. We can also work in partnership with Community Development Trusts and local communities to act as a management agent for key worker accommodation.
- **Are there any challenges or barriers we need to overcome to help you do this?**
  - **Second and empty homes in the area of the National Park.** The Scottish Government are currently consulting on Council Tax for Second and Empty Homes, and Non-Domestic Rates Thresholds. Our concern as a rural RSL, is the acute shortage of affordable housing and homelessness in rural communities. Second and empty homes is a major issue and concern for us. To retain and attract people to rural communities we need to meet housing needs and this relies on a supply of affordable housing, this is critical. We have a huge unmet demand for housing much of it from people who are in employment struggling to find a secure home or who have opportunities to work in our areas whether seasonal or permanent but cannot find a home they can afford. We also have younger people already living in rural towns or villages unable to start a home of their own for the same reasons. Rural villages rely on schools, transport, and local services and when people leave these services are no longer sustainable and rural villages die. The LLTNP must use their influence with the Scottish Government to combat rural

homelessness by making it more difficult for owners to leave homes lying empty when there are acute housing shortages.

- More must be done to proactively address barriers to housing delivery such as flooding issues across many locations. Aberfoyle is a key example where housing development in an area with huge demand is practically impossible due to flood risk.
- **Can you suggest any other objectives or actions to help us meet our aims in each area of the Draft Plan?** Transport connections between key employment hubs and housing must be strengthened so those on low incomes can access work out with their community.
- **Can you suggest any other delivery partners needed to help deliver these?** Scottish Government, Local Authority, local Development Trusts, and communities through the Local Place Planning process.
- **Do you have any comments on the policies outlined in each area of the Draft Plan?** Our comments are focused on Policy with respect to Meeting Rural Housing Needs
  - There is a reference to a minimum of 30 homes per year on pages 103 and 116. Is this an error?
  - The plan acknowledges that the National; Park is one of the most expensive places to live with 75% of households in the park unable to afford average house prices, and 43% unable to afford lower value house prices. This is evidenced in the LLTNPA Housing Market Study 2022. There needs to be an aggressive approach to land allocation for affordable housing be that social rent and affordable home ownership. The delivery of a minimum 30 new homes per year is grossly inadequate. There should be direction for the LDP process to over-allocate for housing sites that have high levels of affordable housing (50%) as well as ensuring that design policies consider the financial challenges affordable housing schemes face.
  - The planning process at Stirling Council is less challenging than the LLTNPA. There needs to be a meeting of minds to ensure that the two processes support the delivery of affordable housing within funding constraints. Additional constraints placed on design and specification for developing in the National Park puts additional costs on borrowing and pressures on existing tenant's rents. For example, providing play areas in new build developments as a condition of planning that will not be adopted by the local authority for maintenance purposes places a long-term financial burden on the RSL and tenants.
- **Do you have any comments on the measures of success proposed?** No.
  - **How can you help us to measure them?** Through the local authority Strategic Housing Investment Plan (SHIP) affordable housing supply programme.

## **Respondent 14**

### **Reverse the Cuts (Killin Nursery)**

I am contacting you today on behalf of a group of concerned residents who have assembled to tackle a recent crisis inflicted upon our rural community in the Eastern side of the National Park. In the spirit of transparency, my email today has a dual purpose with two intentions; firstly to ask for support in working together to face the aforementioned challenge, and secondly to provide an insight into the people, and future, of the Park from within our communities which can hopefully help to shape and strengthen the National Park Partnership Plan.

Having read the Draft Plan, it is clear to understand the importance of placing the People at the heart of the Park as stewards for change, and many of the challenges faced can be overcome through the nurturing of its people and therefore communities. Skilled, working-aged individuals need to be retained and encouraged to the area and given the opportunity to thrive, whilst quality education of the next generation of Park custodians is essential to address the long-term future of the Park in overcoming the nature and climate crises. As it currently stands both parties are being driven away from the Park and back into cities.

### **The Challenge**

The only nursery within the National Park (to our knowledge) providing childcare for ages birth to two, Killin Nursery, has fallen victim of the devastating cuts recently made by Stirling Council. This cut to essential services only became apparent after several requests for nursery places were rejected, no one was made aware of these changes to service prior to this. As you will know, Killin Nursery's catchment area is expansive, encompassing Tyndrum, Crianlarich, Killin, Lochearnhead, Balquhidder, Strathyre and the outlying residents of Lawers, Fearnan and Ardeonaig. For context, Killin is the only nursery within Stirlingshire to

have this provision removed, and to add salt to the wound the Council have instead invested extensive budget into opening two brand new nurseries within the past few weeks, one of which is in Stirling city centre where there is already a plethora of childcare options available. The next nearest childcare provider for this age group is circa thirty miles away, an hour's drive which is not a viable nor carbon reducing solution.

To remove such a lifeline for working families and the attraction for those moving to the area has already and will continue to have a profound effect on the community, economy, and well-being of the Park. Without these influential people supporting and contributing towards the Park's ambitions as detailed in the Draft Plan, the success of this transformational change, in our opinion, will be impossible.

### **If not now, when?**

The impact of this decision is already evident, several families have been immediately affected with some even forced to put their homes up for sale, having to move elsewhere to live, work and raise their children. Their skills, talents, disposable income and contribution to our community will be lost. If we don't take action now to fight for what little services we have left then this loss will only be amplified within the coming months and years, resulting in further cutbacks to vital infrastructure and services.

Recently our rural communities have welcomed a noticeable increase in young families to the area, the nursery being a magnet for this demographic and thus significantly increasing the demand for these, now revoked, services. The Park will see a drastic reduction in incomers who keep these villages alive and flourishing, with the aging population only ever increasing as a result. We need to act now before this crisis becomes unrecoverable.

### **If not here, where?**

With the cost-of-living crisis now hampering the resurgence of our local economy in a post-pandemic, post-Brexit world, the Park's businesses are now faced with even more challenges as a result of this ill-conceived cutback. Skill shortages and recruitment challenges are an every-day reality for the small enterprises operating within our communities and even more damaging is the lack of investment in local commerce caused by a drastic reduction in disposable income. It's a vicious circle which is unmistakably evident whilst taking a stroll through any of our villages, the empty shopfronts and vacant commercial spaces speak volumes. An environment like this cannot entice a skilled workforce to fill green jobs vacancies when there is no wider support package for their families, they will merely take their skills and wealth elsewhere.

People cannot afford to not work when faced with skyrocketing inflation, not to mention the single-income households who wholly rely on the nursery in ensuring they can return to work and provide for their family. The only solution for many is to move out with the Park or rely on government benefits, neither of which is conducive to providing a sustainable future for us all. It's difficult to imagine a future for ourselves and our children working alongside the National Park Partnership when we are being persecuted by the Council for living rurally.

### **If not us, who?**

We, the group I am speaking on behalf of, are the diverse individuals who you seek to deliver this transformational change; collectively we are strengthening the resilience of our community and through unity empowering one another to lead local innovative initiatives to shape our own future. We have taken on this challenge despite knowing it's complexities. Our aim is to work collaboratively with stakeholders and supporters to create

momentum and take action to remove these barriers to living and working within the Loch Lomond & Trossachs National Park.

Our children are the real victims of the nursery cuts. They are the future generation of the Park. They are the future ecologists, biodiversity officers, park rangers, conservationists, they are the National Park Youth Committee in years to come. The reason many of us chose to raise our children here is because we want them to grow up in an environment where they can access nature and prosper from the benefits. We want to teach them the importance of nurturing their surrounding environment and empower them to positively influence their own futures in striving to halt climate change. If we don't give them a voice, then who will?

### **Our Ask**

We need your help. We ask the Authority to show your support for this intervention, to work alongside us to enable change and guide us in breaking down these barriers.

We have some creative ideas of our own, which alongside assistance from yourself could form solutions once the decision has been reversed, but first we need to be heard. The group have worked tirelessly in producing tools to gain traction, including extensive research to supply an evidence base which reflects the current situation and contradicts the decisions made. We would be happy to share these with you if requested.

Your opinion on the matter would be extremely appreciated and any further guidance gratefully received. We would welcome the opportunity of a round table discussion with the Authority and other stakeholders such as Stirling Council, to consider creative ways in which the childcare provision can be reinstated or at least the gap filled.

As emphasised on page seventeen of the Draft Plan; "tackling the nature and climate crises is not separate to supporting the rural economy and communities", so let's work together to address this issue for the greater good...with your help, we CAN do it.

### **Respondent 15:**

#### **VisitScotland**

#### **RESTORING NATURE FOR CLIMATE**

VisitScotland takes national Net Zero targets seriously and is committed to the principles of the Glasgow Declaration. Strategic support of specific interventions at regional level includes continued partnership with the Loch Lomond and the Trossachs National Park, local authorities, destination organisations, sector groups and other key bodies. Planning and successful delivery of location-specific initiatives to extend the traditional holiday season, improve visitor circulation and geographical spread of destination appeal will depend on multi-agency collaboration; and VisitScotland remains dedicated to close strategic and operational alliances in and around the National Park.

VisitScotland supports the proposed measures and policies to restore peatland, create and sustain diverse woodland habitats; and improve water quality. Generic responsible and

sustainable consumer messaging could be augmented by location-specific advice on best practice; and how sensitive visitor behaviour can contribute to park plan objectives, national strategic DNZ 2045 ambitions; and contribute to new normal codes of practice. For example, agri-tourism businesses and community amenity operators could benefit from specific marketing focus at sector or geographical level; and/or advice on attracting specific types of customer.

The majority of tourism businesses will rely on a planned transition to Net Zero; and help to secure environmentally sustainable suppliers, adopt internationally-recognised best practice and adapt to consumer needs and legislative requirements. By achieving and maintaining green credentials, the business community can make operational savings and create a worldwide competitive advantage.

## **RESTORING NATURE FOR HEALTHY ECOSYSTEMS**

VisitScotland supports the proposed measures and policies as outlined above. International and regional digital platforms could provide updates on large-scale nature restoration projects, links to volunteering opportunities; and - in agreement with the National Park - apply sensitive and appropriate visitor guidance to sites that continue to experience pressure or are undergoing restorative works.

## **SHAPING A NEW LAND ECONOMY**

VisitScotland supports land use changes and policies that encourage primary local food production. In particular, organic and/or free-range methods of plant and meat products are increasingly popular with local consumers and visitors. Research indicates all consumers are willing to pay extra for local produce; and a majority of visitors will pay extra for organic/free-range/low-carbon footprint food products as part of their holiday experience. Buy Local schemes have also become significant drivers of change in consumer habits; and can be supported through regional marketing output.

VisitScotland supports the introduction of legislation that favours environmentally sensitive business practices. For example, visitor economy-based commercial or community developments might need to satisfy planning consent or licensing conditions that uphold national commitment to DNZ 2045.

## **CONNECTING EVERYONE WITH NATURE**

VisitScotland supports nature-based tourism development. Combined industry and consumer research consistently places Scotland's natural environment as a key reason for visits and one of the most popular holiday experiences. The proposed outreach and outdoor education measures can be supported through links from [www.visitscotland.com](http://www.visitscotland.com) to the

National Park and Destination Organisation digital platforms, reinforce volunteering opportunities and advise on visitor management associated with the wellbeing walks portfolio. There is an opportunity to address under-represented user and visitor groups through social media campaigns and social partnerships.

## **IMPROVING POPULAR PLACES AND ROUTES**

VisitScotland supports the principles of minimising negative impacts of tourism, recreation and leisure activity generally, and in sensitive areas particularly. The precise measures have not been defined in the Draft Plan, other than a series of infrastructure development studies. Findings from recent LLTNP workshops (including active travel) should provide useful baseline data and inform proposals for action around location-specific improvements and interventions (visitor hubs, transport interchanges, EV adoption and charging infrastructure, public transport solutions and/or traffic management to include parking capacity at nodal sites, off-highway shared path network connectivity and water-based recreation access and infrastructure).

Successful visitor dispersal schemes, or park-and-ride equivalents, depend entirely on realistic and reliable alternatives in the form of passenger demand-based public transport networks, rail capacity for bicycle carriage, bicycle hire options with flexible drop-off locations, fair charges for tickets, parking and rentals; and 24-hour access arrangements in some places. Significant widespread public information exercises will be necessary in advance of project delivery.

At present very few of these elements are in place or in the pipeline, and VisitScotland is prepared to assist with establishing priority interventions with key delivery partners, and business and community representatives. There is very limited physical capacity at some of the priority locations, while others have long-term vacant, under-utilised and/or abandoned sites. VisitScotland can help identify those that might meet short-term needs and longer-term development ambitions.

VisitScotland will continue to support and involve the National Park in the Scotland-wide partnership on visitor management; and take an active role in the encouragement and promotion of new responsible tourism products and experiences.

## **LOW CARBON TRAVEL FOR EVERYONE**

VisitScotland is committed to the principle of a low carbon destination. Strategic support of measures linked to **IMPROVING POPULAR PLACES AND ROUTES** (above) include promoting sustainable travel options for residents and visitors, and operational advice on a sustainable integrated waterbus service network.

The national commitment to DNZ 2045 underpins regional visitor economy development strategies where partnerships typically include local and national park authorities, destination organisations, enterprise agencies and VisitScotland. These partnerships can provide

valuable industry and consumer opinions and practical advice on low carbon travel solutions, business solutions to accessibility and inclusivity deficits; and collaborative measures to address mass transit corridors and high-demand routes.

## **TRANSITIONING TO A GREENER RURAL ECONOMY**

VisitScotland supports the principle of a wellbeing economy. Appropriate housing availability mitigates population decline, encourages economic activity and presents opportunities for local community and regional social improvement. The visitor economy depends on entrepreneurial local residents and sustainability depends on retaining and attracting new talent.

Strategic tourism and regional economic partnerships present platforms for local and park authorities to test housing policy, identify partners and sites; and build practical relationships with tourism business communities. Accommodation solutions for seasonal staff are necessary components of the policy process and some adjustment of planning policy might be necessary to permit temporary arrangements.

VisitScotland can promote green skills development opportunities and provide links to the latest national policy position, green tourism best practice and templates for local interpretation of climate action plans.

## **LIVING WELL LOCALLY**

VisitScotland supports the principles of a greener economy and sustainable living; and the measures and policies outlined above, including community action on climate mitigation and adaptation.

Local empowerment and community care of heritage assets is a fundamental tenet of national de-centralisation ambition, but projects must be supported by sustainable business cases and appropriately qualified and experienced personnel. VisitScotland can provide strategic advice on visitor attraction development, market analyses, operational challenges and sustainable businesses modelling.

## **HARNESSING DEVELOPMENT AND INFRASTRUCTURE INVESTMENT**

A fundamental role of VisitScotland's Industry and Destination Development directorate is to maintain the visitor economy as an investment priority. Market intelligence and other consumer research findings provide invaluable data for local and national park authorities to inform investment decisions and to attract private sector interest.

VisitScotland administers the Rural Tourism Infrastructure Fund (RTIF) on behalf of the Scottish Government, and supports solutions to visitor management challenges in places under significant and/or increasing pressure. We advise on Growth Deal and UKCRF projects nationwide, and our input is acknowledged and respected by project principals, and the Scottish and UK Governments.

VisitScotland will offer strategic support to project proposals that meet the priority objectives of the National Tourism Strategy (Scotland Outlook 2030) and the National Strategy for Economic Transformation (NSET) across key themes in agreement with local partners. This will include support for critical tourism infrastructure (roads, toilets, parking, camping and motorhome facilities, viewpoints, cycle routes, visitor hubs, paths and trails, loch access provision and signage) to be of the highest quality and design standards appropriate to National Park status.

VisitScotland supports the strategic tourism infrastructure plan approach as a mechanism for identifying and prioritising infrastructure requirements in the medium and longer term. VisitScotland encourages the National Park to continue this methodology to assess emerging projects, including those that are eligible for RTIF support.

On-going investment in high quality tourism infrastructure, including visitor accommodation, will be encouraged through a supportive planning and development framework that welcomes sustainable and ethical capital spending models.

## **Respondent 16:**

### **Ramblers Scotland**

Ramblers Scotland is pleased to have the opportunity to comment on the draft national park plan. Ramblers Scotland is recognised by **sportscotland** as a governing body of sport and we are a membership organisation and a charity with a grassroots network of 56 local groups, running 3,500 group walks a year which are all led and organised by 1,300 volunteers. We work to ensure that everyone, whatever their background or ability, benefits from the joy of walking. We have a number of groups based around the national park with some members of these groups living within the boundary. These include groups in Helensburgh & West Dunbartonshire, Mid Argyll & Kintyre, Lochaber & Lorn, Perth, Stirling & Falkirk and Bearsden & Milngavie. Many more of our members from across Scotland enjoy visiting the national park for walks and other activities.

## General comments

We are pleased to see the commitment within the park plan to make a step change in the way the park responds to the nature and climate emergencies. We fully support a transformation in the way the land is managed and used in order to ensure the long-term sustainability of the park and the wildlife and habitats within it.

One of the four aims of the national park is:

*to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public*

This is the aim which is most relevant to our interests, and reflects the majority of our comments, but we will also comment on other aspects of the plan which are relevant to outdoor recreation and walking in particular.

Overall, we feel that the aim above should be more strongly reflected in the objectives and policies within the plan. We specifically recommend that the national park develops an **Outdoor Recreation Plan (ORP)** following the publication of this national park plan and to inform its implementation. We understand the reasons why previous work on the ORP was paused due to the Covid pandemic, but not the subsequent decision to discontinue the ORP entirely. We feel that without a focus on outdoor recreation and the ways the park can support people to experience the special qualities of the park, those who are enjoying outdoor activities are relegated in this plan to being visitors to be managed, or visitors who will support the local economy. These are clearly important elements of the park's work, but come from the perspective of the park authority rather than those who are actually taking part in recreational activities.

The population-wide benefits to health and wellbeing of ensuring people have opportunities to enjoy the outdoors are not emphasised. Yet, despite having almost no direct economic impact on the park, we would suggest that these benefits are one of the most important reasons for having national parks in Scotland and should be at the heart of any ORP. This is especially pertinent to Loch Lomond & The Trossachs NP given the proximity of Glasgow and its surrounding areas, with places where people are facing high levels of deprivation along with other barriers to participation. There has been an increase in visits to the outdoors by people living in Scotland since the Covid pandemic, which is to be welcomed and supported, but it is not clear that this increase has reached into these areas. The park's aims to be more inclusive won't happen without direct interventions and that can be planned for within an ORP.

We note the park plan includes an objective relating to increasing the diversity of those who are enjoying the park, and we believe an ORP would help to strategically plan for all the recreational needs of residents, day visitors or those staying overnight in the park. It would map the various activities taking place, potential areas for where they could be expanded and promoted – and also areas where people might be discouraged from going by not promoting them, due to the need for protection of sensitive sites. We're aware data on visitors' motivations and activities is gathered by the park authority but it's not clear how far this has informed the park plan. Data on what visitors do and what they would like to do (and in which seasons) should guide action. The management of access, including guidance on responsible access, should be recognised in the ORP for its fundamental role in ensuring

that both the public and land managers are supported and access is strategically considered, along with helping to guide decisions on staffing and resourcing.

## **Vision for 2045**

The references to people who visit and enjoy the park within the vision is disappointing. These relate mostly to their modes of travel to and around the park and the economic impact of their visits. There is a reference to visitors feeling “connected with nature whilst enjoying great services and facilities ...”. However, there is no mention of outdoor recreational activities or any reflection of the wider public health benefits which enjoyment of the park can bring. These benefits often have no direct monetary value to businesses in the park, but at a population level are nevertheless extremely valuable, both for physical health and mental wellbeing. It is disappointing to see an aspiration for nature connection to be linked to economic activity rather than being seen as a benefit in itself.

People need to be inspired, encouraged and supported to visit the park for a wide range of reasons and not simply for economic ones. They also need to be engaged, informed and educated on both nature/wildlife/landscapes and their own responsibilities outdoors, whether through formal outdoor education activities or just as a part of their experience of being in the national park. The vital role of ranger services in this regard could also be referenced in the vision, given their fundamental role in engaging the public and caring for nature within the park.

## **Restoring nature**

**Peatland, Trees, Water** – we support actions to restore peatlands and the objectives relating to trees, especially where natural regeneration can be supported without the use of deer fencing.

**Restore nature at a landscape scale** – we welcome the recognition that “It is only within the past few years that it has become more widely accepted that protection alone is not enough to halt the decline in nature” (p40). For nature to recover and thrive, action at a landscape scale is required and we therefore welcome objectives related to this.

**Reduce grazing animal pressure** – the key to much of this restoration will be the reduction of grazing pressures. Impacts from high numbers of herbivores has long been an issue within the park so it is to be hoped that this renewed effort and proposed step change in action will have a clear effect. However, while it is important to measure changes, it would be helpful to have a target set out in the plan for all measures to restore nature. For example, while there is a target for peatland restoration and woodland creation there is nothing for grazing impacts, beyond carrying out habitat impact assessments every two years. A target showing reduction in deer numbers over time, for example, would help to assess how ambitious this plan really is in this regard.

## **Creating a sustainable, low-carbon destination**

### **Connecting everyone with nature**

We fully support the aim to connect people with nature. Given that the main motivation to visit is to enjoy the scenery, there is a huge opportunity to inform and educate people while they are visiting the park and often more receptive to such messages. This can include engagement on issues relating to the changes which are required in the way nature is restored and carbon emissions reduced, as set out within the plan. As mentioned above, an Outdoor Recreation Plan would be an important strategic document for such engagement.

**Inspiring action for nature and climate** – we welcome the objective on p68 relating to outreach and outdoor learning, though query why there is no reference to wider engagement and communication on both responsible access and nature/wildlife. The role of the ranger service in the day-to-day general engagement with visitors is key to influencing behaviour for the better and helping everyone to be aware of their responsibilities.

**Diversity and inclusion** – we fully support objectives related to expanding diversity and inclusion of those visiting and volunteering in the park. Given that the target audiences for this objective are less likely to own a car, it is imperative that pathways to and around the park by low cost public transport are created and promoted. Likewise, these audiences are not only interested in day trips but also longer stays and are most likely to need low-cost accommodation, such as campsites. The current provision of camping places in permit areas still doesn't reach the number of tents which were counted prior to the byelaws, suggesting there is a greater demand for campsites than is currently available. Also, many of the permit sites are generally only accessible by car and have no toilets or, where there are toilets, these close at 5pm. We would like to see the park working with public sector landowning bodies like Forestry & Land Scotland to develop more low-cost camping areas which are accessible to those without a vehicle and with basic facilities. Likewise, seasonal, or pop-up, camping areas in fields with basic facilities could help ease summer pressure but these have not yet been established, despite being common practice in some other national parks, including in England.

**Multi-year place programme / Visitor hubs** – we acknowledge that the challenge facing the park in terms of shifting the pattern of car-dependency for people getting to and travelling around the park is immense. While 50% of the Scottish population live within an hour's drive of the park, that number drops massively if they were to use public transport to arrive in Balloch, Tarbert/Arrochar or Callander, or trying to travel around the park. While we recognise that the park is not a transport provider, it is a concern that this issue has not been seriously tackled during the past 20 years.

**Recreational path network** – we support investment in the recreational path network. As a side note, given the increase in periods of heavy rainfall noted in the plan, the construction of shelters along more heavily used paths would be welcome. Simple shelters with benches would enable people to sit out of the rain to have a break which can make a big difference when going for a walk on wet days. These could be set at a distance far enough away from roads to discourage vandalism. With the majority of walking activities taking place around settlements or at lower levels, it's right that core paths and long-distance routes are prioritised. However, there is very little funding available in Scotland for upland paths, especially for private landowners to apply for, so it's important that the park authority also

takes account of the popular hill routes which can be heavily used. If not maintained, these paths can increase risks of erosion and environmental damage.

While there are many references to aspects of visitor management, there is little mention in the document of access management. Removal of obstructions, alongside liaison and support for land managers, and strategic oversight of the path network and other infrastructure is a key role for the park's access team. It is fundamental for ensuring that public access is not restricted, creating more barriers for the public to enjoy the park.

**Byelaws** – we note that the camping byelaws will be reviewed during the period of this plan. We wish to record our continuing objection to these byelaws which we believe have been costly and resource-intensive to manage. We do not dispute that there are pressures in some places and issues relating to some people's behaviour while camping, but we believe that improvements could have been achieved by diverting the budget spent on setting up and policing the byelaws into improvements to infrastructure, enforcement of existing legislation and more engagement by ranger services. It is telling that no other access authority has introduced byelaws to deal with similar issues to those faced by the park, and as a result there is little learning that can be disseminated to others from this investment. We would like to see these byelaws allowed to lapse.

### **Greener economy and sustainable living**

**Rural transport and active travel** – we fully support objectives to improve options for active travel around the park, as this will be beneficial both for residents and for those visiting the park. As well as links between and around communities within the park, this objective should include working with neighbouring local authorities to provide and promote safe offroad routes into the park, for example to hubs like Callander from the railway line through Stirling to Dunblane. This would enable people to reach the park by bike as well as improving the path network on the fringes of the park which may take some pressure off the popular places within the park.

We fully support objectives related to supporting a modal shift but suggest that the approach is both carrot and stick, ie, making driving into the park more inconvenient while ensuring there are regular, reasonably priced public transport alternatives. This could include park and ride facilities and shuttle buses along east Loch Lomond or on the outskirts of Luss as well as working with public transport providers to promote bus and train routes. Improved water bus options should also be included. Reducing overall traffic levels would make the option of cycling and walking within the park safer and far more attractive. The forthcoming upgrade to the A82 and works on the A83, likely to take place during the period covered by this plan, provide a good opportunity to shift behaviour patterns, given that congestion is likely to be a feature of these works

**Local Place Plans** – while there are references on p111 to key issues for Local Places Plans, there is no mention of the importance of the need to focus on public access. This includes taking account of land on which access rights apply as well as the paths and routes we rely on to facilitate our access rights. This is set out in NPF4 Policy 20 Blue and Green Infrastructure. Rough grassland, farmland, green spaces and woodlands in and around the edges of our settlements are all important places to enjoy recreation and improve the wellbeing of the community. These places are often under threat from development. If there

are no formal routes like core paths or rights of way through these areas, there is a danger that informal (but much valued) local access is overlooked. If this is mapped in Local Place Plans it's less likely that new development will take place without accommodating existing access patterns. Therefore we suggest adding public access to the list of priority areas.

**Respondent 17:**

## Police Scotland

I have been asked to provide feedback on the above plan on behalf of Forth Valley Division Police Scotland.

Key points that we would respond to largely surround Visitor Management and transport divergence.

- During the summer weekends it is well documented that many of the key visitor destinations become over run with an infrastructure that isn't currently able to cope with demand. This results in indiscriminate parking, wider road network congestion and a risk to staff from tired and irate visitors. It also disrupts those living and working in the areas who are trying to continue with their day to day business. Over the preceding years a concerted effort by the partner agencies, along with some minor infrastructure enhancements, have gone some way to addressing these challenges but from a police perspective the demand on resources to police these areas may not be sustainable given current pressures.
- We would be supportive of proposals that look to reduce demand on the limited parking available and the reduction of vehicles on the road network such as the Callander hub and previously discussed shuttle bus and Balmaha Masterplans. A transport network that self manages with minimal demand on staff resources would be an attractive proposal.
- Any move towards public transport, or more sustainable methods of transport, needs to enhance not hinder the visitors experience. Convenience is key for many visitors and travelling by car which does not have any timetable limitations and the ease of carriage of personal items will always be an attractive option to visitors. So how does alternative travel enhance the experience is a key question. We know from discussions at visitor management groups that some visitors will happily accept a parking fine if that means they can park closer to their destinations and this shows just how hard it will be to change some visitor's behaviour.
- Visitors need to diversify their destination. We have found during visitor engagement that all too often visitors will have the intention of visiting a specific destination, whether that's facilities such as Balmaha or to climb a specific hill. On being advised that car parks are full, not accessible etc. visitors will remain fixated on their objective and rarely have alternative destinations in mind. Any steps that create a concept that the 'National Park' is the destination may help keep visitors fluid and more accepting of attending at alternative sites.
- We continue to see pinch points at places such as the Cabin on Loch Lubnaig. Despite infrastructure changes and introduction of clearways, visitors remain determined to attend here and park in dangerous or inconsiderate locations. The use of locations such as this need to be considered with a view to understanding how we can better diversify visitor destinations. Is it access to the loch, toilets or beverage provision or all? Would alternative toilets, beverage facilities reduce demand on this specific site? Could pop up facilities nearby be an option?
- There needs to be some behavioural changes by visitors to not only diversify their destinations as mentioned above, but also to understand that it's also ok to 'walk to their walk'. By way of an example, we often see parking pressures in and around Bracklinn Falls in Callander. This location has a specific car park but it is also within walking distance to Callander. We often see visitors prefer to park out with the car

park, blocking roads or access points and when its suggested that they could park in the town and walk to the start of their walk they seem to think this is a completely unreasonable suggestion.

**Respondent 18:**

**Perth & Kinross Council**

Thank you for the opportunity to respond to the Draft National Park Plan. Perth and Kinross Council remains committed to working in partnership with the National Park Authority to deliver the objectives and actions outlined in the draft plan where we can assist.

- We believe that we have a joint role especially in respect of the Plan's topic of sustainable transport matters because of its trans-boundary nature to help deliver more sustainable ways for people to travel to and from the National Park through improved and joined up sustainable and active travel options.

In Perth & Kinross, work has started on the early stages of reviewing our [Local Development Plan](#) and developing our mobility strategy – [let's talk transport!](#) We would like to extend you an invitation to collaborate with us as work progresses and we would like to extend an offer to collaborate with you on your National Park Partnership Plan in return.

On behalf of my colleagues, I would like to congratulate you on developing the draft plan, we look forward to working with you and wish you every success with the National Park Plan.



twice a year but no meetings have yet been scheduled for 2023) and that body which is supposed to advise the LLTNPA on matters relating to access (and therefore outdoor recreation) has not there had a chance to discuss the NPPP.

**Respondent 20:**

**Marine Planning**

Thank you for the opportunity to look at the Partnership Plan. I see there are a few references to the marine area in the Plan within a water objective, related action and a Policy for Restoring Nature for Healthy Ecosystems.

The knowledge base section of the Plan does not mention the statutory National Marine Plan (A new National Marine Plan (NMP2) is currently being developed and so would need considered in future iterations of the plan), and throughout the plan I see no reference to the Clyde Marine Planning Partnership (CMPP) or that there is a draft Regional Marine Plan in development in the Clyde marine region. I note that the Loch Lomond and The Trossachs National Park borders the Scottish Marine Area, and the Clyde marine region, and that the National Park is a member of the CMPP.

As stated in the National Marine Plan; 'The Marine Acts require that public authorities must take authorisation or enforcement decisions in accordance with this [National Marine] Plan, unless relevant considerations indicate otherwise. They must also have regard to this Plan in taking other decisions if they impact on the marine area.' This is provided for in s.15 of the Marine (Scotland) Act 2010. Once regional marine plans have been approved public authorities must also apply regional plans in the same way during decision making. Please review s.15 for full details of this.

Please consider this in light of the Loch Lomond and the Trossachs National Park Authority being an executive non-departmental public body, with responsibility for deciding planning applications within the National Park area.

## **Respondent 21:**

### **Luss and Arden Community Council**

Overall, the three principal themes of the plan are to be supported but the required funding for delivery must be in place.

This should not be achieved through inappropriate “giveaways” to landowners and developers in exchange for funding and investment where the unintended consequences can have significant negative impact in other areas.

Is it now the time to introduce a visitor/bedroom tax to help meet our funding requirements?

There is a danger of the park being turned into a theme park where visitors must be entertained but the principle of getting back to basics where visitors can simply enjoy the benefits of the natural environment should be the primary objective.

The National Park Authority is to be applauded for its commitment to supporting communities to produce and deliver individual Place Plans but we believe more funding is required for this purpose. These plans are crucial for authorities to understand the needs of communities and when produced must be recognised and form the basis of future planning decisions. All our communities are not the same and have different problems, needs and ambitions.

To date, visitors have been at the forefront of planning policy at the expense of communities. Moving forward, communities must now be supported sustainably for residents to have a reasonable quality of life, health and wellbeing. This has been lacking in previous years and must now have significantly more weight in this new Partnership Plan.

As stated previously, all our communities are different so we will comment on a few specific issues from a Luss and Arden perspective.

#### **TRAFFIC**

We believe Transport Scotland now estimates there to be more than 6 million vehicle movements on the A82. This has a significant impact on our environment in terms of both emissions and noise pollution and must be addressed although we appreciate this is easier said than done.

Significant investment in public transport at a national and local level (connecting communities) is essential. There must be an alternative available for change to happen.

Consideration could be given to introducing average speed cameras which would reduce pollutants and deliver a much-needed accident prevention/reduction measure.

Consideration could be given to introducing a Park wide low emissions zone like many being rolled out in our cities.

## VISITORS

As stated in the draft plan the park has about 4million visitors per annum. From our Place Plan Luss and Arden have more than 850,000 of those visitors. **Roughly speaking, that is a staggering 21.25% visiting Luss, a conservation village with a core population of approximately 94 and a parish population of approximately 300.**

Whilst Luss has been highlighted as a problem area in the Partnership Plan the community needs help. The visitor numbers are simply not sustainable. The negative impact they are having on the health and wellbeing of residents cannot be understated. The attendant anti-social behaviour is appalling and although this is by a minority it is significant.

**Luss and Arden needs help and as detailed in our Place Plan we need the Park to designate the Community Council area as an area of visitor pressure.** We appreciate the Park has been trying to divert visitors via the Visitor Management Group but we need protected status sooner rather than later. Whilst we cannot turn back the clock we can stop adding to the problem.

## HOUSING

Housing stock within the village core has been reduced by 25% rising to 35% across the Council area. These are proper potential homes that have been lost to holiday accommodation of one form or another.

Moving forward, it is essential that any new housing consent must have a permanent residence restriction attached. Such a condition can be found in all standard mortgage offers from lenders and as such will have no impact on values.

We need a change in policy to make it easier for holiday lets to return to mainstream housing and to make holiday lets less attractive as an investment through regulation and taxation.

Luss and Arden has 29 residential consents issued but they remain undeveloped. Mechanisms need to be put in place to ensure delivery of consents generally within a reasonable timescale or they should be forfeited.

Within Luss and Arden there is a limited need for affordable housing to support our young people and workers within the park. Funding is however an issue and always has been but increasing the number of market housing rates to pay for it is not the answer as this simply adds to other problems by creating unnecessary housing in the countryside. This brings us back to the need for a visitor/bedroom tax to assist with such funding.

Rather than outright "affordable" housing more cost-effective, cheaper and smaller open market accommodation could be considered in suitable locations.

**Respondent 22:**

**Low Carbon**

Low Carbon is a privately-owned UK investment company committed to making a positive and significant impact on the causes of climate change through the development and operations of renewable energy power production at scale. Our ultimate aim is to reduce carbon emissions and mitigate the negative effects of climate change and have set our sights on generating 20GW of renewable energy by 2030.

Our comments on the consultation are limited to one section-Do you have any comments on the policies outlined in each area of the Draft Plan?

**Policy for Development and Infrastructure Investment**

**Large scale wind farms will not be supported within the National Park in accordance with National Planning Framework 4.**

**While we do necessarily agree with the above, given the Climate emergency we are living through, we do respect the aims of NPF4 in relation to nationally significant developments and onshore wind in particular.**

**Wind Farm proposals adjacent to the National Park should be located and designed in ways that do not adversely impact on the special landscape qualities of the National Park.**

**We strongly believe that the policy above could impact negatively on achieving the renewable energy targets that we have, as a nation. This is especially important over the life of this plan in light of the climate emergency, and we would urge that it is clearly aligned to the aims of NPF4 and that projects outside of the national park should be supported where they can be.**

### **Respondent 23:**

#### **Lomond Active**

We are based at Brig o Turk, a village on the outskirts of Callander. We have invested over GBP1.5m in tourism accommodation in the national park to attract tourism of a certain quality that will enhance the area and spend money in the local economy.

We have visitors from all over the world that are respectful and want to engage with the beauty and nature of the area. However, the National Park approach to maintaining and ensuring that further investment on the area occurs is static and narrow minded. LLTNP are biased towards their "local connections" and accept the pre-historic attitude of many residents that refuse to embrace the future while injecting cash into areas that would be isolated otherwise. This national body should be independent and protect all within its boundaries the same way: species, woodlands, mountains, lochs, rivers and residents.

Without investment in the smaller hubs of the Park many areas will become abandoned and left to rot as the new generation opts for visiting areas that offers a certain quality of life and services. Rejecting planning development on the National park based on pollution or flooding are flawed as it is the authorities themselves who create the pollution by allowing campers, not providing litter bins at all and disturbing the natural habitat with tree felling. Flooding has been the responsibilities of the authorities in Scotland since forever. They have failed to design a programme with proper hydraulic engineers to prevent mass flooding in roads such as Aberfoyle, Brig o Turk and Kinlochard. Both The A821 and the A\*29 have huge flooding issues that a few sandbags are not going to solve.

Scotland number one industry is tourism after oil. The oil industry won't exist by 2045.

It is naïve to diminish the importance of holiday lets, hotels, hostels, and B&B in an area where other economies are extremely limited (services, forestry and agriculture). The national Authorities should encourage sustainable development in areas that are disappearing (No school at Brig o Turk, no post office. only the village hall and 1 pub remain). Licencing and bureaucratic obstacles will mean that such accommodation will be sold as secondary homes/estates that will lie empty for most of the year and to foreigners. Scotland economic future won't survive without the

With an extremely ageing population villages such as Aberfoyle, Strathyre, Milton, Kinlochard will experience the “flying the nest” syndrome in 25 years’ time. The park has a duty to protect the park but also to protect its people and create an environment where there are local jobs, local services and recreational aspects driven by the demand from residents and from visitors.

Many policies of the park are rustic and do not embrace change.

Flooding is one of them (Responsibility of the Authorities both Stirling council and LLTNP). Before a programme that dictates how people should behave and be in the LLTNP, the authorities, which we all assume are professionals, must tackle the inefficiencies that exist now:

Flooding in main roads which is a basic right of access to homes.

Lack of public transport

Bad signs on paths, routes and hills

Caravans, campers and motorhomes pollution on air and land

Co2 from cow rearing (climate change)

Litter is another. (Responsibility of the Authorities both Stirling council and LLTNP)

Rural adaptation is another (Broadband, telecommunications, etc)

Under the plan 3 main areas are identify:

#### 1) Restore Nature

Plan does not cover the following points:

The need for commercial size bins (with a weekly lift service in look outs areas /camping sites/overnight van parking areas along Loch Venachar and Loch Ackray.

The amount of rubbish left behind by visitors as well as dangerous items such as glass bottles, fire hazards, bbq utensils, fishing hooks, etc has escalated and left the area look like a third world country.

Historic stone bridges- 18<sup>th</sup> century bridges at Brig o Michael and Brig o Turk which are part of environment historic Scotland and are part of nature and of the scenery within the park.

The increase passing of larger vehicles, 4x4, vans is not only affecting the greenhouse footprint of the area at Brig o Turk but also it is damaging the historic structure of such bridges (which most will host otters and beavers’ nest as per my latest ecological survey). The Brig o Michael bridge is a listed historic building that needs to be preserved and protected. What are the LLTNP policy on this? The continuous traffic over it will cause irremediable damage and actions to limit weight should be imposed asap before it is too late.

#### 2) Creating a Sustainable low-carbon Destination

Loch Katrine and the area suffers from continuous large traffic of tourist buses, motorbikes, small planes overhead, caravans, etc. There are no EPV chargeable points at all anywhere from Aberfoyle to Callander to Loch Katrine.

Bike rentals is limited and noise and air pollution on the increase plus LPG and old gas boilers emitting bad gasses co-habited in the villages. Renewables, solar and hydro are expensive and unattainable by many. LLTNP should enforce a programme to start upgrading people s heating systems with grants and financial support towards renewable the same way they are making residents upgrade their septic tanks.

Low carbon means limiting gas heating emissions, limiting cattle farming, limiting traffic unless all can be bio-based feed with materials or feeds and supervised and controlled by the authorities.

### 3)Enabling a greener Economy and sustainable living

Without development, housing and a programme that allows a clear investment in tourism (from development to experiences and recreation) there will be no future for smaller areas within the LLTNP

All our properties are sustainable with green energy (a huge investment from our side) and promote the most respectful of tourism who come to enjoy and love the Trossachs. Barriers such as control areas or licencing which represent a huge cost to landlords will diminish the hospitality industry and portray a country which remains stuck in the past. There is a duty of care by a landlord and as adult we do not need to regularly check our premises, boilers, electric systems. How does the LLTNP plan to impose a sustainable living for the elderly in the park? How do they envisage locals will be able to upgrade their homes to a greener energy?

Litter and rubbish are a huge problem in the park with most walkers dropping litter, dog poo bags, paper as they walk along. Visitors' mentality is not to take the litter home but to drop it. Providing bins and a civilised regular waste collection will clean up the image of many parts of the park. Paying at car parks is a great incentive for people to respect the area and providing litter bins will show where to put the rubbish rather than dumping it.

Lack of signage for private paths / lockable gates is causing trespassing and vehicles reaching dangerous areas

Lack of street lighting in urban areas of the park

Allowance for huge emission of CO2 by caravans, buses, land rovers and old vehicles which "live in the park" and are used constantly polluting the historic woodlands.

The draft of the plan gives the authorities too much power over people's land and livelihoods. This is a breach of human rights. The LLTNP should focused on the park/roads/areas themselves but not on any land that is privately owned and managed.

Limiting the ability to do short-lets will be the downfall of Scotland and the gain of other countries. The licencing process is long and costly and many people will opt to sell away the asset for other uses. Visitors accommodation will be limited and put in jeopardy. Scotland needs its tourism and therefore it needs to protect and encourage good professional rentals.

## **Respondent 24:**

### **Tactran**

Thank you for the opportunity to provide our comments on the draft National Park Partnership Plan 2024 – 2029. Overall Tactran is supportive of the Plan, its vision and supporting aims, objectives and policies and is keen to work with the Park Authority to deliver the actions required. We feel that we can provide most assistance in Creating a Sustainable, Low-Carbon Destination, but can also assist in Enabling a Greener Economy and Sustainable Living.

### **Creating a Sustainable, Low-Carbon Destination**

#### **Connecting Everyone with Nature**

We agree that the way people travel the National Park is currently not compatible with Net Zero targets and that improved sustainable public transport and active travel is required. In particular, we support the objective of a Sustainable Visitor Economy to offer more low emission nature opportunities including the action for maximising opportunities for low carbon tourism and the part that transport can play in achieving this.

#### **Improving Popular Places and Routes**

We support the aim by 2045 that *'People have a high-quality experience visiting the National Park and are able to use great services, facilities and routes with less impact on nature or contributing to climate change. Communities see fewer impacts of tourism on everyday life. Nature is recovering more rapidly in less visited areas, where priority has been given to non-motorised access and recreation activity.'* In particular we support the objectives by 2030 for:

- A multi-year Place Programme that includes actions and projects that support inclusion and improved accessibility and modal shift to sustainable and active travel. We also

consider that we can provide advice on the action requiring the development of a growing and reliable EV charging network, as we have a Tactran Regional EV Strategy and a Regional EV Steering Group with our constituent Local Authorities.

- Ensuring investment in visitor hubs at, or linking to, Balloch, Callander and Arrochar/Tarbet will enable more sustainable ways to travel both to and within the National Park including links to improved active travel networks. We can provide advice and support on the three actions associated with this objective. However, we would question why neither Tyndrum nor Crianlarich, both of which provide a gateway to the Park from the north, have not been considered to be potential Visitor Hubs as both have direct access to the rail network as well as the road network and could provide good links to sustainable travel to, from and within the Park, particularly as Tyndrum has been identified as a priority location. Also in this regard it would seem appropriate to include the rail network as well as the road network on the map/diagram on page 77.

### Low Carbon Travel for Everyone

We support the aim by 2045 that ***'The National Park has a thriving rural transport sector providing services which have reduced the number of car journeys and transport generated emissions, met the travel needs of both visitors and residents and provided more inclusive access to the outdoors.'*** In particular, we support the objectives for a **Whole Systems Approach, Incentivising Sustainable Travel Choices and Developing a Rural Transport Sector** and are able to assist in developing and delivering the actions required to meet these objectives.

**Page 74 of the document outlines who needs to be involved in creating a low carbon destination, however there is no mention of Regional Transport Partnerships (RTPs) and we ask that RTPs are included here.**

**In terms of targets and measuring success it is noticeable that the Scottish Government's target for reducing car kilometres by 20% by 2030 has not been referenced. It would be appropriate for progress towards this target to be a measure of success. We would also be able to provide advice and information on this and other ways of measuring success for buses, trains and active travel and would be happy to be part of the discussions on this.**

### Enabling a Greener Economy and Sustainable Living

#### Living Well Locally

We agree that one way to assist in reaching net zero is by people living more locally without needing to use a car, and instead by using active travel (walking, wheeling or cycling) or public transport. We support the objectives by 2030 for:

*Low carbon local living and consider that we may be able assist in the action to 'support improved opportunities to live more locally through taking a local place-based partnership approach towards service delivery, including supporting the retention of local services and facilities, public transport, alongside innovative new approaches towards rural service provision, including through digital and online opportunities.'*

*Rural transport and active travel and consider we may be able to assist in the two accompanying actions to 'support communities to identify improvements to rural transport options' and 'establish active travel opportunities within and between communities'*

Page 110 of the document outlines who needs to be involved in enabling a greener economy and sustainable living, however there is no mention of Regional Transport Partnerships (RTPs) and we ask that RTPs are included here.

Again, in terms of targets and measuring success it is noticeable that the Scottish Government's target for reducing car kilometres by 20% by 2030 has not been referenced. It would be appropriate for progress towards this target to be a measure of success. We would also be able to provide advice and information on this and other ways of measuring success for new low carbon transport and active travel opportunities and would be happy to be part of the discussions on this.

#### **Respondent 25:**

##### **Individual response**

##### **National Park is not a big National Nature Reserve**

The Draft Partnership Plan from the Loch Lomond National Park has now been published and I have become convinced it should not be accepted without very significant changes. As it stands it fails completely to lay out how the Park should proceed in order to achieve its third objective: *to promote understanding and enjoyment of the special qualities of the area by the public*. In simple terms the Plan, as set out, appears to be for a National Nature Reserve not for a National Park.

When National Parks were established, most of us thought we understood what they were about. Firstly, the two areas chosen (Loch Lomond and Cairngorms) were spectacularly beautiful and needed to be protected from mining, quarrying, power lines, wind farms, overgrazing etc. to conserve the landscape. Secondly the random, disorganised facilities that visitors use to enjoy the landscape: the car parks, beaches, footpaths, cycle paths, forest trails, bus links, cafes, camp sites, boat trips, visitor centres etc. etc. would, we hoped, be improved and co-ordinated. Quieter parts of the Park would be promoted, Honey-Pot areas controlled. Rubbish and litter would be removed.

Various tasks within the Park, such as Public Transport, water sports, litter collection, nature conservation, hotel services and path maintenance were already being undertaken and we understood the National Park Authority was charged with co-ordinating these with an overarching Partnership Plan. “*These plans set out how all those with a responsibility in each park, across public, private and voluntary organisations, will co-ordinate their work to address the most important issues in relation to conservation, visitor experience and rural development*”. (<https://www.gov.scot/policies/landscape-and-outdoor-access/national-parks/#>)

The first National Park Partnership Plan identified what they hoped the Visitor Experience would be like:

**Our vision: We want the National Park to be an internationally-renowned landscape where... there is a high quality, authentic experience for people 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.**

**What we want to achieve:**

**[Outcome 5: Recreation opportunities](#)**

The National Park has a wide variety of well promoted and managed outdoor recreation opportunities providing for a range of abilities and interests.

**[Outcome 6: Water Recreation](#)**

There are more opportunities to enjoy water-based recreation and sporting activities across the Park's lochs, rivers and coasts while maximising safety for all users and protecting the quality of water environments.

**[Outcome 7: Visitor economy](#)**

The Park's visitor economy is thriving with more businesses and organisations working together to create a world-class destination.

**[Outcome 8: Visitor management](#)**

The most popular parts of the National Park which experience pressures are managed to ensure that the quality of environment, visitor experience and community life are protected and enhanced.

**[Outcome 9: Health and learning](#)**

People from a wider range of backgrounds are enjoying, valuing and helping manage the National Park. It is used more as a place for people to realise the personal health and wellbeing benefits of connecting with nature and being active in the outdoors.

Actions to meet these objectives were then detailed in the [Outdoor Recreation Plan](#).

The new Draft National Park Partnership Plan takes a totally different approach to the previous plan. Apparently, this is “*because during the period of the previous Partnership Plan, 2018-23, the context within which the National Park Authority and our delivery partners work has completely changed – we are recovering from the impacts of a global pandemic, adjusting to the UK leaving the EU, and the need to respond with greater urgency to the twin climate and nature crises has escalated significantly*”. Outdoor Recreation, far from being the *raison d'être* of the National Park, has become a threat. Climate Change and Nature Conservation are now paramount. Where restricting wild camping has offered a model, restricting access to sites of importance to nature conservation will follow.

It became clear at the explanatory Webinar conducted by the Authority that the authors believed that there exists some “ideal” position where there is no change in climate and no associated changes in flora and fauna. This defines what some believe to be the sustainable position. In practice there are bound to be changes, many brought about by human activity. Sometimes the change will be too fast with unpredictable and dangerous ramifications. The job of governments and their agencies is to ensure that the change is compatible with the overall welfare of the community.

There are many elements that make up welfare. The mental and physical health of the population of the West of Scotland is as much an issue to be considered as the health of the wildlife (and there actually is an immediate crisis of Obesity leading to early death). There is no doubt that where transport in the Park is concerned, the use of subsidy (which is far from sustainable in the very limited sense of users covering costs) is perfectly acceptable. The Plan needs to consider these issues. However with Climate Change and Nature Conservation (Sustainability) dictating the agenda, the management of visitors rather than the promotion of recreational opportunities becomes the Plan. The result is the overall objective is identified as “Creating A Sustainable, Low-Carbon Destination”.

I do not accept the fundamental argument italicised above. Far from the pandemic and Brexit reducing the importance of Outdoor Recreation in the Park it has, in fact increased it. The pandemic itself encouraged people outdoors and significantly increased long term participation in more active pastimes such as kayaking and hill-walking. It also encouraged “staycations”. Similarly, the main feature of Brexit has been the collapse in the value of the pound against the Dollar and the Euro, making vacations in Scotland more attractive to both. There are, as a result, huge problems of too many people at the “Honey-Pot” sites such as Luss and Balmaha and grossly congested roads in the Park, like the A82 at Stonymollan. The associated problems are Campervans, litter and human waste. Given the situation at Balloch, development of “self-catering” villages is, surprisingly, not even mentioned. Sustainable?

The impact of the proposed National Park Plan on Climate Change is close to zero. The proposed Master Plan at Tarbet consists of an expansion of vehicle parking; much needed but hardly a step towards Zero Carbon. With the expansion of vehicle numbers and increased access to motor vehicles, any move to net zero will be the result of the move away from diesel and carbon vehicles to electric and the gradual disappearance of gas guzzlers. The speed of the transition will largely be determined by the price and the availability of charging points. Which “partner” will take responsibility for installing charging points in Car Parks in the Park? Will it be the NPA?

One other factor that determines the rate of progress towards net zero in the Park, is congestion. Traffic jams have an extremely detrimental impact on fuel consumption and pollution. There will be 5 years of disruption, congestion and single lane working on the A82 if the proposed shoreside route is followed and undoubtedly similar with current proposals for the A83 Rest and be Thankful. Yet neither of these huge infrastructure projects have been mentioned by the NPA in this planning document. It is difficult to believe that slowing climate change is more than a slogan to avoid identifying how the Park proposes to deal with the real problems.

I was surprised at the suggestion that there is a “Nature Crisis” in the National Park, because there does not appear to be: *“Our ecosystems are in good health and helping us to adapt to and mitigate against the climate crisis, supporting the National Park to be an overall net carbon sink for Scotland”*. Like Climate Change the adoption of this slogan will have minimal

impact on global nature problems such as the destruction of the Amazonian rain forest and the rapidly declining diversity of both fauna and flora.

In 2011 the LLNP published a study which looked at the “Value” of the National Park. For activities where there are no charges, such as hillwalking, looking at the landscape or extracting drinking water, various techniques from environmental economics were utilised to give them values. What was unexpected was the huge annual contribution of the Park to Public Health (£95.4m). Feeling good appears to be very, very valuable to us!

Unlike Climate and Nature there is a Crisis which the NPA can actually mitigate; that of Obesity. In my view Active Travel and Outdoor Recreation, backed up by cheap effective public transport, in a conserved landscape, should be the focus of the National Park and its Partners for the foreseeable future. It should be recognised that public transport could easily be marketed in relation to one-way trips such as Arrochar to Balloch. Abandoning the Outdoor Recreation Plan is exactly and completely in the wrong direction. Making no attempt to improve opportunities for Outdoor Activity in the Tarbet Master Plan is a similar missed opportunity. Not taking responsibility for the West Loch Lomond cycle path is sadly typical. The tacit opposition to opening the North-West of the Loch by rerouting the A82 higher up the hill is, in my view, a betrayal of the objectives of the Park.

Within the Draft there are proposals but they seem partial. Few of us could object to the plan for Transport:

- *Develop a governance model in collaboration with responsible transport authorities and agencies which enables a National Park wide approach to rural transport planning.*
- *Develop new targeted seasonal transport services that provide a viable and attractive alternative to the private car to access popular National Park destinations.*
- *Gather data which demonstrates the latent demand for rural travel to inform service planning.*
- *Develop and deliver an active travel strategy that links up services and infrastructure as key parts of an integrated, connected multi-modal transport experience of the National Park.*

However does anybody seriously believe that most people will be using public transport in the park in 2030 without some very serious changes such as no cars on east Loch Lomond on summer weekends or free transport to and up the Loch for families. Will anyone use the waterbus as a “bus” if it costs £46 for a family of 4 to cross one -way to Inversnaid.

Finally, I should add a worry that the de-carbonisation plan involving peat restoration and woodland planting, which appears to be central to the proposed strategy, is based on an estimate of tourism activity from the STEAM model. STEAM estimates are based largely on tourist expenditure ratios and in the past did not appear to match physical counts or be safe. In the case of the LLTNP, which has a very large day trip market, the estimates are substantially below those estimated from traffic entry and exit statistics. In our 2011 study we were surprised indeed shocked that no-one in the Park could provide any agreed number of visitors. Given Loch Lomond Shores alone claimed 1.3m visitors in 2016, the notion that there were only 2.3m visits to the Park in total is impossible to believe. A further check is the STEAM estimate of the transport to get to the Park. Their estimate is that 15% (1 in 6) came by plane; a figure that is clearly too high and is the result of the denominator (total numbers) being far too low.

One conclusion of the 2011 study was that the LLTNP should establish an annual analysis of traffic flows to better estimate what should be the most important measure of how it is

performing; visitor numbers. It was not undertaken and, as ever, it probably has a better estimate of the number of water voles than the number of people,

**Respondent 26:**

**Friends of Loch Lomond and the Trossachs and Helensburgh District Access Trust**

The Friends of Loch Lomond and the Trossachs (FOLLAT) is a well known and long established conservation charity and pressure group which seeks to protect and promote the national park. Currently it has a little over 150 members.

Helensburgh and District Access Trust (HADAT) is a SCIO charity comprising a group of volunteers aiming to improve Active Outdoor Recreation (AOR) for locals and visitors in the area to the west of Loch Lomond. It developed and is now responsible for maintaining The Three Lochs Way (TLW) a great Scottish Trail that runs from Balloch to Inveruglas via Helensburgh, Garelochhead, Tarbet and Arrochar. In addition to the work on the TLW, HADAT also helps maintain the section of the John Muir Way between Helensburgh and Balloch. In conjunction with the Friends of Loch Lomond and the Trossachs, it is currently seeking to work through the power distribution companies' VISTA/VIEW projects on a "pylon free" TLW route from over the Luss Hills from Glen Fruin to Tarbet. In conjunction with the FOLLAT, HADAT has also mounted a petition to the Scottish Parliament urging it to reconsider Transports for Scotland's failure to fully implement STAG based analysis with respect to their upgrading of the A82 which threatens to do huge environmental damage along the west shore of Loch Lomond between Tarbet and Ardlui.

HADAT carries out this work voluntarily because it believes (and independent studies confirm) that Active Outdoor Recreation is both enjoyable *per se* and significantly improves the mental and physical wellbeing of the community. A 2011 study of the value of the National Park suggests that its contribution to the Public Health could be valued at £95.5m a benefit to which both FOLLAT and HADAT contribute well beyond their status as small independent charities.

I have already made a brief response on behalf of Helensburgh and District Access Trust, but I think you may also be interested to see this fuller response on behalf of both these organisations. Maybe I have misread your document, but I am concerned that as it stands the draft Partnership Plan (PP) seems to downplay some of the park's original fundamental aims. They should not be forgotten in a rush to apply some "Greenwash".

That is not to say that HADAT does not accept that zero net carbon emissions should be a minimum target for all of us and should be part of any plan to improve the services the Park offers. However in our view the overwhelming focus of the draft plan on Climate Change and Species Loss may be miss directed.

The first National Park Partnership Plan identified the vision of the Visitor Experience they planned to produce:

**"Our vision: We want the National Park to be an internationally-renowned landscape where... there is a high quality, authentic experience for people 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.**

**What we want to achieve:**

**Outcome 5: Recreation opportunities**

The National Park has a wide variety of well promoted and managed outdoor recreation opportunities providing for a range of abilities and interests.

**Outcome 6: Water Recreation**

There are more opportunities to enjoy water-based recreation and sporting activities across the Park's lochs, rivers and coasts while maximising safety for all users and protecting the quality of water environments.

**Outcome 7: Visitor economy**

The Park's visitor economy is thriving with more businesses and organisations working together to create a world-class destination.

**Outcome 8: Visitor management**

The most popular parts of the National Park which experience pressures are managed to ensure that the quality of environment, visitor experience and community life are protected and enhanced.

**Outcome 9: Health and learning**

People from a wider range of backgrounds are enjoying, valuing and helping manage the National Park. It is used more as a place for people to realise the personal health and wellbeing benefits of connecting with nature and being active in the outdoors.”

With the unfortunate demise of the Outdoor Recreation Plan, HADAT believes that the above set of outcomes should be incorporated in the Partnership Plan, perhaps within an overall arching recognition of the urgent need to mitigate global warming.

Also we think that the Partnership Plan should be looking to create circumstances where the Park can be more proactive. At present it can sometimes seem to be too reactive - only coming to issues when they have gone too far to do anything much about. An example of this re-active approach is clearly illustrated by its approach to the A82 Tarbet to Inverarnan upgrade. The favoured Low Road proposal would do untold damage to the shoreline, but the “High Road” option would open up the north end of Loch Lomond for Active Outdoor Recreation; walking (completing the TLW to Ardlui), cycling (producing a west loch cycle route from Balloch to Ardlui stations) and kayaking/canoeing. It would also hugely improve the quality of life for people in Tarbet and Ardlui, but the response of the Park Authority seems to have been muted, ignoring completely the Visitor Experience and identifying non-existent environmental “problems” such as cutting through the edge of the Garabal SSSI. It

later turns out that geologists would actually welcome such activity as it would help uncover the interesting underlying geology without destroying it.

Similarly on the A83, the park seems content to sit back uncritically as Transport Scotland develops its ugly and destined to fail engineering solutions to the debris flow problem next to The Rest and Be Thankful pass, when any geomorphologist would tell them that 'managed retreat' is a more sustainable way forward when you are faced with the kind of powerful geomorphic processes now developing above the road in the unconsolidated glacial debris lying there and being regularly lubricated by the increasingly frequent extreme rainfall events caused by global warming.

In determining its attitude to both of these major engineering proposals, we hope that the Partnership Plan will remember the basic reasoning behind the formation of the National Park and strongly resist the ill-advised, short sighted and damaging schemes being mooted by Transport for Scotland. Politicians looking for a populist headline should be questioned. These schemes are being promoted as being the cheapest and quickest, but we have seen that kind of thing before in relation to ferries. The reality is that neither of these schemes make much sense!

Green energy is another area where the park might usefully take a bolder approach. Photovoltaic panels on the Park HQ roof is all very well, but renewable energy production, storage and transmission will be fundamental to finding a solution to the climate crisis and there is no doubt that the policies and measures the LL&TNP adopts within its statutory planning procedures can play a seminal role in facilitating changes here which are now so urgently necessary all over the world. Old ways of thinking may have to give way. Nearly half a century ago, a pumped storage scheme inside Ben Lomond was stoutly and successfully resisted by the Friends of Loch Lomond – it doesn't seem such a silly idea now - and if it had happened, the road to Rowardennan would now be so much better! Attitudes to wind turbines should be reconsidered. Large scale photovoltaic installations should not be condemned out of hand. Electrical propulsion and heating and better insulation should be actively encouraged. The park is near to Scotland's main centres of population. It is large, mountainous and rainy and it is rich in renewable energy production and storage sites and along with the big energy producers and distributors it now has a duty to demonstrate how it can be possible to help power a modern economy while at the same time conserving our beautiful wild places and encouraging people to learn about, enjoy, understand, cherish, preserve and nurture nature. If we don't get a grip on global warming very soon, I suspect there won't be much nature as we know it now around Loch Lomond to nurture. If the park is to make the level of contribution it undoubtedly can, it will mean less of the negative NIMBY and maybe quite a bit more of the more positive MIMBY approach. "M" for "More," "Might" or "Maybe"? You decide which!

Here are some of the things we would like to see a National Park Partnership Plan begin to deliver:

A park which:

- Has less Pollution
- Has less Litter
- Has more toilets
- Has less Congestion

Has less noise  
Is easier to park a car in  
Has more easily accessible beaches and launching points  
Has more and better footpaths including links between major trails  
Has more and better cycle paths  
Has more and cheaper camp sites  
Has a network of affordable electric buses for visitors  
Has world class waterbus/steamer services on Loch Lomond that are regular and affordable and link the whole of the loch from Balloch to Ardlui  
Makes full use of rail services including an electrified West Highland Railway to bring people into the Park at minimal environmental cost  
Has far better provision for young people to develop an interest and skills in outdoor activities at a reasonable cost  
Has programmes of cycling/wheeling and walking activities in the park for people who are overweight or have other disability.

We want a Park Plan that shows how this can come about. As it stands the changes that are required start at Page 1 of the draft and affect every page. There is much to do to improve visitor experience; as of now there is maybe less to do to maintain the environment.

## **Respondent 27:**

### **Individual response**

I support your aims in general and wish to comment on the transport aims for making the park accessible by other than private car access, which you point is the primary method used by visitors.

First, many visitors including myself regularly travel with gear or equipment for recreation, whether rucksacs, bikes, kayaks, canoes, blow-up boats or paddleboards.

Such recreation is really the ideal way to enjoy the outdoors and the nature and wildlife in the park, and so it needs to be supported by any transport system you introduce.

Therefore any bus, or shuttle bus must be able to carry bikes in an easy, quick load manner - up to four at a time, perhaps?

A large box or boot designed to carry rucksacs or paddleboards ( usually collapsed, in a large carry bag ) would be essential.

Second, you should consider also a hub at Drymen for transport to the east Loch Lomond areas, to help reduce pressure on the Rowardennan road and the parking pressure at a Balmaha and Milarrochy. Something just on the edge of Drymen would serve the village, with easy main road access, and the WH Way, and the access to the east loch.

I appreciate there would be challenges to implant these ideas and make them affordable, but they have merit in helping to achieve your bold aims of a low-carbon sustainable transport future.

Thank you for this opportunity to contribute.

## **Respondent 28:**

### **Individual response**

I've finally been able to watch the recording of the Zoom seminar recording for the VRs.

A few things popped into my head as I was watching it.

Regarding public transport, before the pandemic a local bus company ran a 'bike bus' from Balloch (I think) up the West side of Loch Lomond to Ardgarten, with a few stopping points on the way. It maybe stopped due to lack of use, or maybe money was an issue. But it was a good idea. You're more likely to go out cycling as a family if you know that if the wee ones get tired or a bike breaks, that you have a way of getting back to your start point easily. More people might be encouraged to cycle to Luss from Balloch if they know they don't have to cycle back again. Plus fewer cars in the Ardgarten and Arrochar car parks if mountain bikers use the bus. Walkers can use it too.

Also, a shuttle minibus from Balmaha to Rowardennan, stopping at Milarrochy, Cashel, Salloch. I'm sure this has been considered before. It would cut down on traffic on the East side a little bit and there are always lots of folk wanting to walk to Rowardennan along the Loch side, but at the moment you need to leave a car at either end, or get to Rowardennan in time to catch the waterbus.

Living in Bonhill, I know that the two main things we'll be asked about here are 'Flamingo Land' and the Vale of Leven windfarm. Although the windfarm is not in the NP, it will have a big impact on the views from within the Park. How do I find out what the official line is from the NP regarding both of these projects? Can the NP influence the wind farm decision at all as it is very close to the border of the Park?

Many thanks for providing us with so much information. I'm off to read the plan now!

## **Respondent 29:**

### **RSPB**

RSPB Scotland welcomes the opportunity to comment on the draft Partnership Plan and looks forward to continuing to work positively and constructively with the National Park Authority to meet the urgent challenges outlined.

We manage two nature reserves in the National Park; RSPB Scotland Loch Lomond and RSPB Scotland Inversnaid, covering approximately 1,115 hectares. The very nature of our land ownership in the National Park is collaborative, with our Loch Lomond reserve part of the larger Loch Lomond National Nature Reserve (NNR) managed jointly with NatureScot and the Park Authority. RSPB Scotland Inversnaid is part of The Great Trossachs Forest, the second largest NNR in Scotland. Additionally, our Conservation team work closely with National Park Authority staff on key species such as Black Grouse. More recently we have been closely involved with the development of the Future Nature Strategy and fully support this step-change in how biodiversity can be improved in the Park.

We are also not just responding to this Partnership Plan as land managers, as we have staff and volunteers who live within the Park boundary. Our collective passion for and understanding of the special qualities of the National Park are key factors in our desire to be part of a healthy future in it.

We below succinctly outline the ways in which RSPB Scotland can contribute to the delivery of the objectives of the Partnership Plan under the three main themes outlined in the Plan.

### ***Restoring Nature***

For all three components of *Restoring Nature*, we support the inclusion of a longer-term Aim to 2045 as although urgent, immediate action is required, many elements of this new approach will take time. We would recommend that the objectives are, where possible, SMART in nature and through our participation in the Future Nature Steering Group we will support this.

We can support several of the objectives in this section as we are already committed to ongoing herbivore management, INNS removal, exploring natural regeneration options and habitat creation and enhancement on our two reserves. Our reserves are underpinned by several designated sites and ensuring the favourable condition status of these is at the heart of our Management Plans. We are strongly supportive of the inclusion of Nature Networks in

the Plan and welcome the inclusion of Scotland's 30x30 commitment. It is our position that designated sites should be the cornerstone of future Nature Networks. We believe that collaborative nature restoration is the prime purpose of our two reserves already but are keen to see more detail on the commitment to increase the amount of land managed primarily to restore nature. Effective management of designated sites and tackling strategic landscape-scale pressures (herbivores, INNS) will be a critical part of this process.

It is worth highlighting here that language focusing upon the urgent need to reverse nature declines in the Park by 2030 is important but we are also approaching the halfway point of the decade. Whilst we support the ambition, it is also appropriate to highlight that the conditions, processes, and mechanisms that are required to support and underpin all this work must be understood and realised to ensure that long-term sustainable nature recovery is achieved.

To restore nature in the Park on a genuinely landscape-scale, the right conditions for collaboration must be realised and we believe the National Park Authority can play a demonstrable leadership role in achieving this. The Great Trossachs Forest partnership is an example of an effective partnership that we have been involved with for over a decade now. At 160 square kilometres in the heart of the Park, this landscape and partnership approach can form a blueprint for ongoing and future landscape-scale projects such as Wild Strathfillan and the Loch Lomond Basin Rainforest.

If the level of nature restoration required in the Park is to be achieved, then support from businesses and organisations in the land management sector will be crucial. Multi-year, sustained action on INNS removal, peatland restoration and other habitat creation can rightly be part of a new land economy, but we would urge caution in regard to how this is communicated to avoid any perceptions that 'green jobs' differ from 'jobs.' In the same way that studies elsewhere have highlighted the economic benefits to communities from eco-tourism, we would be supportive of an approach that highlights the potential economic viability from jobs that can underpin nature restoration in the Park over the next two decades.

### **Creating a Sustainable, Low Carbon destination**

We are strongly supportive of the aim to make the National Park a place where people of all backgrounds can benefit from nature, and we are encouraged to see the natural heritage of the Park front and centre throughout the entirety of the Partnership Plan and not just confined to the Restoring Nature section.

Sustainable, nature-based visitor management is a key component of our work and at RSPB Scotland Loch Lomond we have already established strong links with groups and audiences whom in the past the conservation sector would have overlooked. We have good links with community groups in the Vale of Leven, which contains areas with some of the highest levels of social deprivation in Scotland. We have established good relationships with organisations such as Children's Hospices Across Scotland (CHAS), Tulloch and Green Routes; the latter two delivering a range of holistic skills and opportunities for young people. For organisations like us to become increasingly relevant to the world that we are trying to change we must continue to break down barriers and provide a range of nature-based opportunities for people from varying backgrounds. We would welcome the opportunity to work with the National Park Authority on amplifying this work. There are, however, significant challenges relating to the accessibility of the National Park for those who do not have access to a car.

We are supportive of a commitment to refresh the National Park's volunteer programme. Volunteers make a significant contribution to our work in the National Park and across RSPB Scotland. We accommodate up to 3 residential volunteers at RSPB Scotland Loch Lomond every 6 months and a team of 30+ non-residential volunteers help with practical land management and visitor engagement, contributing more than 2,700 hours per annum. Volunteering can be a gateway to new skills, improved health and wellbeing and combatting social isolation. For this ambitious Partnership Plan to succeed, increasing volunteer opportunities/numbers will be required. We support the development of a National Park volunteer hub to highlight opportunities and accessibility requirements.

The provision of sustainable, nature-connected visitor opportunities is a high priority for us. One of the main aims of NNRs is to "*give people the opportunity to enjoy and connect with nature*" and the impact of the new all-access boardwalk at RSPB Scotland Loch Lomond has resulted in a sustainable increase in visitors. We welcome the action to work with organisations to help maximise opportunities in low carbon tourism, but this is fundamentally connected to the current lack of regular public transport opportunities across the Park. Investment in visitor infrastructure at Balloch, including links to improved active and public travel networks is also essential to improve low-carbon and inclusive accessibility to not just the RSPB Scotland Loch Lomond reserve and wider NNR but the whole southern end of the National Park.

For us, the ***Whole System Approach*** objective is arguably the most significant in the entire Plan. As previously outlined, public transport options for visiting the Loch Lomond NNR and RSPB Scotland Inversnaid are extremely limited. The car park at RSPB Scotland Loch Lomond currently has limited capacity for cars and we have seen a marked increase in visitor numbers at the site following the completion of the new trail to the loch shore and latterly the successful translocation of a family of Eurasian Beavers. In line with the aims of NNRs, it is our objective to provide sustainable nature experiences for visitors from all backgrounds and whilst we are greatly encouraged by people wanting to visit the reserve, this could present challenges moving forward. Without a National Park-wide shift in the provision of rural transport, this challenge will only increase.

A strategic, integrated transport network including affordable Waterbus and seasonal bus options would not only present opportunities for visitors to experience Scotland's internationally important Rainforest and The Great Trossachs Forest but also provide accessibility for the volunteer opportunities. The National Park Authority can provide leadership on showcasing the benefits of a functioning, integrated rural transport system and this is fundamental to the success of this Partnership Plan.

We believe that RSPB Scotland Loch Lomond (and the wider Loch Lomond NNR) has the potential to be a genuine National Park gateway site and a hub of nature-based opportunities from volunteering, events, and the chance to experience some of Scotland's most important wildlife first-hand. For visitors without access to a car or bike, the options to get to the NNR are infrequent bus services with then no pavement and a busy main road to the main entrance or a taxi, which is an unrealistic, unsustainable mode of travel for many people. We recognise that the aims and objectives of *Creating a sustainable, low-carbon destination* are complex, but we are keen to work with the National Park Authority on this because we fundamentally believe that positive changes to the travel network in the National Park could bring some of the most significant impacts over the next decade.

## **Enabling a Greener Economy and Sustainable Living**

We support the nature of the objectives throughout this section but would recommend that consideration is given to minimising duplication (for example, green economy, refresh of the volunteering programme, inclusion) between other sections of the Partnership Plan for ease of access. We support the recognition that communities should be supported on adapting to a changing climate and share the view that natural capital has the potential to play a key role. Linking in with the *Restoring Nature* objectives, consensus and buy-in from a diverse range of stakeholders, including communities, is important. RSPB Scotland staff have recently engaged with the Strathard Framework and Drymen and Gartocharn Local Place Plans, processes which highlighted the need for local people to be involved with place-based decision making. We would be keen for clarity on how these can further be utilised to unlock funding to support resilience and the restoration of nature. These Plans also have potential to positively contribute to the rural and active transport discussions.

We are supportive of a *nature-first approach to development* and RSPB Scotland will continue to intervene in development matters where there is the potential for adverse impacts on the designated site network. With the relatively recent emergence of Biodiversity Enhancement in Scotland there is the potential for this to become a new funding stream to amplify the nature restoration objectives across the National Park. RSPB Scotland are keen to work with other Future Nature partners as and when opportunities arise.

The tourism sector is vital to the economy of the National Park and our vision is for RSPB Scotland Loch Lomond to be a flagship site for both nature conservation and visitor experience in the National Park. Future sustainable and sensitive development at the site can form a significant part in making the National Park a genuine destination for wildlife experiences. For this to be achieved, we want to work with the National Park Authority to explore opportunities for sustainable infrastructure development appropriate to both the site and its operation. This could include employment and training opportunities for Park residents and better links to local and national path and transport networks.

## **Conclusion**

We welcome the hugely positive intent from the National Park Authority on the need to work differently and at pace. The Park Authority should be commended on a step change in how it responds to the urgent twin climate and nature crises and RSPB Scotland is keen to offer support and expertise. Partnership working will continue to be essential, and we look forward to continuing to work positively to find practical solutions alongside the Park Authority through the Plan's lifespan.

In responding to this Draft Plan, we found the volume of information difficult to navigate and considerable overlap between a number of the objectives. Although it could be argued that all the objectives are priorities, we recommend in the final version that the highest priorities are made clearer.

The feeling of being in a National Park must be different from being outside one and this Partnership Plan is a chance to achieve that feeling on an unprecedented scale. This should apply not only to what the landscape looks like but in a rural transport revolution, sustainable wildlife experiences and opportunities for all, no matter your background to volunteer, learn new skills and access new places. The National Park Authority have shown considerable leadership over the last twelve months to drive Future Nature forward and this can be replicated across the suite of objectives in this Plan to inspire people and lead a culture of change.

**Respondent 30:**

**Individual response**

If the aim is to reduce car and bus use within the national park it would be helpful if we had a local Co-op to save people travelling to Dumbarton and Helensburgh to obtain groceries. Alternatively a community based food store in the Village hall, would be a bonus for local people. I understand that it is difficult to achieve, but we must start somewhere.

**Respondent 31:**

**Cycle Stirling**

With your deadline approaching I have added some feedback from others in my comments which I have put online - on the interactive map and the short survey.

I have drawn more strategic input on your strategic development Map but can't attach that anywhere so here it is!

I have also attached a Public Transport Map (2016) which we did as part of the initial research for the FVLeader Cycle Tourism project.

I think they indicate the shape, gaps and potential, with more entry points and links than just the main roads.

The principles are joined up routes, connecting neighbouring communities and urban centres with public transport links, and key HUBs. If we don't have joined up infrastructure and links they can't be used.

People have told me about discussions on missing links from 30 and 40 years ago so forgive my impatience about maximising current opportunities! eg safe links from Crianlarich, to Killin, Glen Ogle, and ideally to Loch Lomond.

**Respondent 32:**

**Cashel Forest Trust**

Thank you for the opportunity to respond to this consultation. We are responding as a delivery partner and wish to acknowledge the support from the National Park to date for a number of the activities of Cashel Forest Trust. As noted below there is good alignment between the aspirations of the NPPP and those we have for Cashel. Similarly, many of the challenges we face at Cashel are common across the Park area.

**About Cashel Forest Trust (CFT)**

Cashel Estate, a former hill farm rising from the shores of Loch Lomond to almost 600m, was purchased by the Royal Scottish Forestry Society in 1996 to conserve existing native forest and extend native woodland planting. Almost 30 years on Cashel now has 5+km of trails and pathways, 300ha of new native woodland, a 300ha peatland restoration project, improved management of around 1,000ha of upland habitat, 1.5ha heritage orchard, a hydro-electric project and visitor centre; and receives more than 10,000 visitors each year.

We aspire for Cashel to be a multi-layered habitat that benefits Scotland's long-term goals of sustainability and greener thinking, locking up carbon and providing nature restoration at

scale. The site has demonstrated its immense potential as a community asset and facility to provide vulnerable groups with opportunities, inclusion and inspiration for positive change.

Our aspirations fall into four main strands:

- People – health and well-being, quality of life, access to environment and nature connection;
- Learning and development – interpretation, volunteering, practical courses, site visits, field studies, citizen science;
- Economic – employment, hydro scheme, sustainable forestry, tourism;
- Environment – biodiversity, native species conservation, habitat restoration and regeneration.

### **Our Response to the Consultation**

We have used the questions on your website to frame our response, concentrating on those of most relevance to Cashel.

#### ***Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver? What role can you play in delivering these?***

- Cashel Forest Trust can help to deliver most of the Nature Restoration objectives with different levels and significance of impact:
  - The Trust is already working with the NPA to deliver a significant peatland restoration project in FY2023/24 of around 200ha (this project will be equivalent to circa 40% of the NPA's Peatland ACTION target for the year). There may be scope to deliver further peatland restoration projects at Cashel, subject to feasibility study, and the Trust would be happy to explore these opportunities with the NPA;
  - The Trust has been actively working to create and restore native woodland at Cashel for almost 30 years, notably the 300ha of mixed native broadleaves and Scots pine that was planted at Cashel in the late 1990s and is now starting to mature. In recent years, and with support from the NPA via the Nature Restoration Fund (NRF), the Trust has been working to regenerate our 14ha mature western oakwood and also to establish innovative montane scrub / treeline woodland trial plots on the hill ground (around 0.1ha in total). Over the course of the next NPPP we would welcome the opportunity to pursue these activities further in line with NPPP objectives on trees and woodland, including via contribution to the emerging Future Nature rainforest project, where appropriate; and
  - The Trust has recently concluded a review of deer management strategy at Cashel to support our overall objectives for nature recovery, notably in terms of peatland restoration / management and woodland regeneration. Informed by better data and evidence on deer populations and impacts at Cashel, we will be working towards a target deer density of 4-6 beasts/km<sup>2</sup>. We are exploring opportunities to work more collaboratively with our neighbours and with colleagues from the NPA, FLS and NatureScot. We are currently scoping the possibility of hosting Herbivore Impact Assessment (HIA) training at Cashel. We would welcome the opportunity to discuss further improvements to landscape scale deer management in the Park and associated supply chains.

- Cashel Forest Trust can help to deliver most of the Sustainable Low-Carbon Destination objectives, notably:
  - Cashel provides a wonderful nature-based destination on East Loch Lomondside and a viable, attractive alternative to help alleviate visitor pressure at existing hotspots in this part of the Park. Post-Covid we have seen increasing numbers of visitors coming to enjoy Cashel and the range of activities on offer, supported by our ranger service. The Trust would welcome the opportunity to discuss where and how Cashel could further support sustainable visitor management in the Park, including any support the NPA might be able to offer the Trust (e.g. with revenue costs associated with maintaining our ranger service at Cashel); and
  - Cashel already plays host to a broad range of education and outreach activities led by our ranger service including: work with mental health charities; guided tourism groups; ecological recording and conservation activities carried out with volunteers; and the Spring / Autumn “Cashel Bash” events offering a range of taster sessions to visitors (e.g. bushcraft, forest bathing) and a platform for other eNGOs with a local presence. We would welcome the opportunity to explore how our education and outreach offer could be tailored to support the NPPP’s agenda on ‘inspiring action for nature and climate’ which is core to the Trust’s work.
  
- We are interested in exploring opportunities and ideas for how the Trust can help support the NPPP objectives on Greener Economy and Sustainable Living. The Trust already employs 1.6 FTEs working in nature-based jobs (rangers) and will be contributing much more indirectly via our various contractors. Cashel has a significant number of built assets that could be restored and repurposed to support nature-based and low-carbon businesses; however, this would require significant capital investment first.

***Are there any challenges or barriers we need to overcome to help you do this?***

- Access to revenue funding to pay for our ranger service at Cashel.
- Access to capital funding to pay for the restoration and repurposing of our built assets to support businesses in the green economy.

***Do you have any comments on the measures of success proposed? How can you help us to measure them?***

- The measures of success for the ‘restoring nature’ topic look good on the whole. Wherever possible the NPA should focus on measures of condition as well as extent and location of natural capital, considering various novel data sources and analytical approaches (e.g., remote sensing, eDNA). The Scottish Government / CivTech supported PeatSCOPE portal from Environment Systems Limited provides useful data on peatland condition that should be considered. A system for regularly updated systematic data on herbivore impacts would be very welcome.
- The proposed indicator on visitor experience is welcome but there should be something similar for resident, landowner, business owner etc perceptions.

**General comments**

- Regarding the climate change aspiration to 2040 – is there a sectoral plan for the Park? Like a regional version of the Scottish Government’s Climate Change Plan. Would this be helpful to drive and accelerate decarbonisation?
- Should the role / importance of nature restoration beyond designated sites be articulated more clearly for a lay audience? For example, an explanation of the carbon storage, water quality, biodiversity etc of healthy peatlands but also how these outcomes can be negatively impacted by related land management practices such as inappropriate levels of grazing and browsing by herbivores (deer, sheep / hill farming)
- It is not overly clear throughout what is / isn’t in the NPA’s gift to influence. How is this weighted? What are the levers that the NPA can pull to influence processes / decisions that aren’t in their gift?
- The Trust supports the narrative of recognising that there will be “tricky choices” and “not always a straightforward or comfortable process”. We should seek win-wins and multiple benefits where possible but recognise that trade-offs may need to be made between objectives at times, with greater weighting towards climate and nature.
- The NPPP’s longer-term vision to 2045 is essential and welcomed. The articulation of this in the principles is sound and comprehensive.
- The multiple references to ‘green finance’ and ‘private investment in natural capital’ should ideally be couched in terms of these sources of finance being ‘responsible’ in line with Interim Principles for Responsible Investment in Natural Capital - gov.scot ([www.gov.scot](http://www.gov.scot))
- The vision for communities having well-established groups and leading innovative projects that support action on the twin crises and working in partnership with local land managers etc is welcome but hugely challenging. There is work to do to encourage members of local communities to participate and to make these themes feel relevant to everyone (e.g. Drymen doesn’t currently have a Community Council). There is a need to build capacity for communities to engage with and participate in the full range of decisions that affect them.

We are happy for this submission to be shared and to provide any further information and clarification.

### **Respondent 33:**

#### **Canoe Scotland**

The proposals as listed for the Loch Lomond and Trossachs National Park are broad yet target specifically the most important environmental concerns. The Environment Committee for the Scottish Canoe Association welcomes the proposals to restore and improve nature, reduce carbon emissions and to promote a greener and more sustainable economy.

We would be pleased to work with you and discuss our concerns in taking forwards your proposals:

1. **Parking and transport for canoes and kayaks.** These are large heavy pieces of equipment that currently arrive on cars/trailers. It would be beneficial for some large parking spaces to be set aside for use by those bringing canoes/kayaks to the loch-side. Whilst it is possible to trolley the boats a short distance, older paddlers or those with medical needs or disabilities would require easy access to pontoons or slipways for their boats close to where they may park their vehicles. Once on the lochs, the canoes/kayaks don't emit any pollution, so are carbon neutral in operation. If there is high demand at certain times of the year, perhaps a booking system could be set up for dedicated parking? In addition, if access is only from one or two areas of the loch but there is a plan to set up a water-taxi service, could some provision be made for the transport of canoes/kayaks from the access point to another area of the loch? A booking system would also facilitate this. There are occasions when due to weather conditions, launching and landing from a particular place may be hazardous/impossible.
2. **Wild camping.** Generally those using non-powered craft such as canoes and kayaks do so to be 'at one' with their environment, enjoying the sights and sounds of nature and respecting the area in which they travel. Unfortunately, the same cannot be said of many people accessing the islands by motorboat and erecting large frame tents, building fires and leaving waste and the remains of their toileting. Perhaps thought could be given to preventing people from camping from motorised craft? I would suggest that as with camping from a car, use of motorised boats does not really constitute 'wild camping'.
3. **Use of the railway for transport.** In past times, trains always included a goods van in which large items could be transported (trunks for students, bikes etc). Using the railway to access the lochs would be desirable, particularly if the trains used are on an electric line, however the addition of a goods van would permit people to bring cycles and canoes on trolleys from further afield. Obviously if there is distance between station and loch there would need to be a shuttle bus provided with a trailer for boats, bookable in advance so that paddlers would be sure of their connection.
4. **Further legislation.** Whilst understanding that at times legislation is required to embed a change of behaviour, this is the area which is likely to cause the greatest concern as it may be viewed as an encroachment on our excellent Laws providing the Right of Access to the countryside. Perhaps, if needed, an occasional temporary piece of legislation may be required to change behaviour, but with a definite time limit...this would not preclude a timed extension if required, but prevents the erosion of Access Rights in general. Overall, it is not helpful if precedents are set within certain areas, as these over time are likely to be expanded to other parts of Scotland. The Law already covers activities such as littering, fire-lighting in unsuitable areas, chopping down of trees, blocking roads and parking on private land. It is difficult at present to imagine what further legislation could be sought in connection with people accessing the land for recreation. The uniformed Ranger service has undoubtedly done more for informing people and resolving issues than is achieved by legislation. Furthermore, if legislation is increased, it will result in more calls upon an overstretched Police service and the Courts to resolve matters.

I hope that the considerations shared above will be informative and of use in discussions regarding the development proposals. Our aims for the Environment Committee of the Scottish Canoe Association are as follows:

- Raise awareness with paddlers of environmental issues and the responsibility for all to protect and enhance our natural environment whilst pursuing our sport

- Communicate and work with our partners including the Scottish Government, NatureScot, SEPA, National Park Authorities, Keep Scotland Beautiful, Scottish Canals and local authorities to benefit our environment.
- Lead proactive engagement projects and campaigns for paddlers to improve and sustain the environment, including sharing best practice

Should you wish to find out more information about our organisation and its work, please refer to the website: [Scottish Canoe Association \(canoescotland.org\)](http://canoescotland.org)

I look forward to hearing from and working in collaboration with you.

## **Respondent 34:**

### **Bòrd na Gàidhlig**

#### **Ro-ràdh**

Stèidhichte fo Achd na Gàidhlig (Alba) 2005, 's e buidheann poblach neo-roinneil de Riaghaltas na h-Alba a th' ann am Bòrd na Gàidhlig. Is e a' phrìomh bhuidheann ann an Alba air a bheil dleastanas gus leasachadh Gàidhlig a chur air adhart agus gus comhairle a thoirt do Mhinistearan na h-Alba mu chùisean Gàidhlig.

'S e amas a' Phlana Cànain Nàiseanta Ghàidhlig 2018-23<sup>1</sup> gun tèid "a' Ghàidhlig a chleachdadh nas trice,

le barrachd dhaoine agus ann an raon nas fharsainge de shuidheachaidhean". Bheirear seo gu buil le bhith a' cuimseachadh air:

- Cur am meud cleachdadh na Gàidhlig.
- Cur am meud ionnsachadh na Gàidhlig.
- Cur air adhart deagh ìomhaigh den Ghàidhlig.

Bheirear an cleachdadh a bharrachd seo den chànan gu bhith, gu ìre, le bhith a' toirt am buil nam buannachdan eaconomaigeach a bhios a' Ghàidhlig a' toirt do dh'Alba. Tachraidh sin tro bhith a' cleachdadh na Gàidhlig barrachd mar sho-mhaoin eaconamach. 'S e ar n-amas gum faicear is gun cluinnear a' Ghàidhlig gu làitheil air feadh na h-Alba, air dhòigh 's gun tèid aithneachadh gu farsaing gu bheil i aig cridhe beatha na h-Alba agus na stòras nàiseanta.

Thathar a' bruidhinn Gàidhlig air feadh na h-Alba. Tha mu 50% de luchd-labhairt na Gàidhlig a' fuireach sa Ghàidhealtachd agus sna h-Eileanan, agus càch air feadh na dùthcha. A rèir Cunntas-sluaigh 2011, bha sgilean Gàidhlig aig 87,100 daoine (mu 1.7% den àireamh-shluaigh), agus 57,600 dhiubh a b' urrainn Gàidhlig a bhruidhinn. Tha iarrtas a' sìor fhàs airson cànan is cultar na Gàidhlig le buannachdan foghlaim, eaconamach is sòisealta co-cheangailte riutha.

Tha Foghlam tro Mheadhan na Gàidhlig (FtMG) a' leudachadh air feadh na h-Alba. Tha e anis ri fhaighinn ann an còrr is dàrna leth nan 32 ùghdarrasan ionadail ann an Alba. Thòisich Foghlam tro Mheadhan na Gàidhlig ann an 1985 le 14 sgoilearan sa bhun-sgoil. A-nis tha còrr is 5,600 sgoilear san roinn thar foghlaim Thràth-bhliadhnaichean, Bun-sgoile is Àrd-sgoile. Gus coinneachadh ri fàs leantainneach san iarrtas bidh feum air tasgadh ann an sgoiltean agus tidsearan.

Tha an t-iarrtas airson Gàidhlig ionnsachadh follaiseach san àrdachadh mhòr de dhaoine a tha a' gabhail ris an app/làrach-lìn ionnsachadh cànain Duolingo. Tha mu 1.5 millean neach air tòiseachadh air Gàidhlig na h-Alba ionnsachadh air an app bho thòisich an cùrsa o chionn trì bliadhna. Tha a' mhòr-chuid (71%) bho thaobh a-muigh na RA, le 36% anns na Stàitean Aonaichte a-mhàin.

Tha cur air bhog goireas craolaidh agus teagaisg air-loidhne SpeakGaelic san t-Sultain 2021 cuideachd air cur gu mòr ri goireasan do dh'ìnbhich a tha airson a dhol an sàs sa Ghàidhlig agus an cànan ionnsachadh.

Fhuair “Suirbhidh Beachdan Sòisealta na h-Alba 2021: Beachdan Poball na h-Alba air a’ Ghàidhlig”, gu bheil, an coimeas ri 2012:

- A’ cho-chuid a tha ag ràdh gun urrainn dhaibh co-dhiù corra fhacal Gàidhlig a bhruidhinn air dùblachadh bho 15% gu 30%.
- Gu bheil a’ cho-chuid a tha ag ràdh gun tuig iad co-dhiù beagan Gàidhlig air a dhol am meud bho 25% gu 41%.

A bharrachd air sin, tha 79% de dhaoine a’ smaointinn gu bheil a’ Ghàidhlig an dàrna cuid cudromach no glè chudromach do dhualchas cultarach na h-Alba.

Lorg suirbhidh de dhaoine òga (iadsan eadar 11 agus 26 bliadhna a dh’aois)<sup>2</sup> gun robh trian (33%) den luchd-fhreagairt ag ràdh gu robh iad ag ionnsachadh Gàidhlig ann an dòigh air choreigin. Thuirt tuilleadh air leth (59%) den luchd-fhreagairt aig *nach robh a’* Gàidhlig gun robh ùidh aca ann a bhith ag ionnsachadh a’ chàinain. Cuideachd, 72% den luchd-fhreagairt gu lèir a’ meas cultar is dualchas na Gàidhlig mar rud luachmhor no fìor-luachmhor.

### **Freagairt**

**Tha Bòrd na Gàidhlig a’ freagairt a’ cho-chomhairle seo oir bhitheamaid ag iarraidh gun toireadh am Plana aithne gu leòr do dhualchas cultarach – prìomh eileamaid dheth sin cànan is cultar na Gàidhlig.**

San fharsaingeachd tha sinn a’ toirt taic do chuspairean an Dreach Phlana mar a leanas:

- Ag Ath-nuadhachadh Nàdar.
- A’ cruthachadh Ceann-uidhe Seasmhach, Carbon-Ìosal.
- A’ comasachadh Eaconamaidh nas Uaine agus Beatha Seasmhach.

Ach, tha ceist ann mun chothromachadh eadar na trì cuspairean agus an fheadhainn co-cheangailte ri dualchas cultarach.

Ann a bhith a’ toirt cunntas air dleastanas reachdail a’ Phlana tha an sgrìobhainn a’ liostadh nan ceithir amasan aig Pàircean Nàiseanta:

- Gus dualchas nàdair is cultarail na sgìre a ghleidheadh agus a neartachadh.
- Gus cleachdadh seasmhach de stòrasan nàdarra na sgìre a bhrosnachadh.
- Gus tuigse agus tlachd (a’ gabhail a-steach tlachd ann an cruth chur-seachadan) a bhrosnachadh don phoball mu fheartan sònraichte na sgìre.
- Gus leasachadh seasmhach eaconamach is sòisealta coimhearsnachdan na sgìre a bhrosnachadh.

Tha seo a’ sealltainn gu bheil gleidheadh agus àrdachadh dualchas nàdarrach agus cultarail a cheart cho cudromach.

Tha an Dreach Phlana cuideachd a' togail air earrann 9.6 de dh'Achd nam Pàircean Nàiseanta (Alba): gu bheil na ceithir amasan “gu bhith air an leantainn còmhla. Ach, ma tha còmhstri eadar a' chiad amas agus gin de na h-amasan eile, feumar barrachd cuideam a chuir air a' chiad amas”. A-rithist, tha seo a' comharrachadh cho cudromach sa tha dualchas cultarach.

A dh'aindeoin seo chan eil ach glè bheag de dh'iomraidhean (tri) air dualchas cultarail san Dreach Phlana.

A bharrachd air an sin, chan eilear a' toirt iomradh air a' Ghàidhlig – a tha na prìomh eileamaid de dhualchas cultarach na Pàirce.

Tha sin eu-coltach ri Plana Com-pàirteachais na Pàirce Nàiseanta a th' ann an-dràsta. Tha iomradh ann air a' Ghàidhlig fo Fàs Margaidhean Turasachd. Tha sin ann an “A' brosnachadh ghnòthachasan turasachd ùra agus stèidhichte gu bhith ùr-ghnàthach agus co-obrachadh le bhith a' gabhail brath air margaidhean a tha a' fàs co-cheangailte ri raon de chothroman” a' gabhail a-steach “Dualchas Cultarach a' gabhail a-steach cànan na Gàidhlig” le Bòrd na Gàidhlig air a ghabhail a-steach mar Chom-pàirtiche Libhrigeadh Taic.

Tha a' Ghàidhlig cuideachd air a ghabhail a-steach ann an Slàinte & Ionnsachadh leis an aithris gu bheil “Tha dualchas cultarach beairteach na Pàirce Nàiseanta cuideachd a' toirt seachad goireas ionnsachaidh, a' gabhail a-steach brosnachadh na Gàidhlig”. A-rithist, tha Bòrd na Gàidhlig air a ghabhail a-steach mar Chom-pàirtiche Libhrigeadh Taic.

Tha Plana Gàidhlig air a bhith aig a' Phàirc rè ùine Plana Com-pàirteachais na Pàirce Nàiseanta gnàthach. Tha e an-dràsta a' leasachadh Plana Gàidhlig a thig às a dhèidh agus a ruitheas airson còig bliadhna.

Tha coltas gu bheil dìth iomraidhean air Gàidhlig san Dreach Phlana a' dol an aghaidh na h-inbhe a tha Plana Gàidhlig na Pàirce a' toirt don chànan an-dràsta:

- “Tha Ùghdarras Pàirc Nàiseanta Loch Laomainn is nan Tròisichean ag aithneachadh gu bheil a' Ghàidhlig na pàirt riatanach de dhualchas, dearbh-aithne nàiseanta agus beatha chultarail na h-Alba”; agus
- “Tha àite na Gàidhlig ann an eachdraidh agus cultar na Pàirce Nàiseanta cudromach”.

Tha diofar ghealltanasan a thaobh a' chànain ann am Plana Gàidhlig gnàthach na Pàirce. Mar eisimpleir:

“Leanaidh sinn oirnn a' leasachadh susbaint cultar na Gàidhlig sa Phàirc air an làrach-lìn againn agus cleachdaidh sinn e gus na dòighean anns an urrainn do dhaoine a dhol an sàs sa Phàirc adhartachadh tro ghnìomhachdan Gàidhlig, leithid Duais Ghàidhlig Iain Muir air a libhrigeadh ann an com-pàirteachas le Urras Iain Muir agus Comunn na Gàidhlig”.

Ach, chan eil iomradh sam bith air gnìomhan mar seo no air Plana Gàidhlig na Pàirce san dreachd Phlana mar a tha e an-dràsta.

Tha e cudromach gu bheil glè bheag de dh'iomraidhean air dualchas cultarail anns an dreachd Phlana agus gu bheil a' Ghàidhlig air fàgail air falbh gu tur. Tha sin air sgàth, mar a tha an

dreachd Plana ag ràdh, gur e an dreach mu dheireadh “Plana Pàirc Nàiseanta Loch Laomainn & Pàirc Nàiseanta nan Tròisichean” (cuideam air a chur ris).

Faodar dèiligeadh ris na cùisean a tha air am mìneachadh gu h-àrd mar a leanas.

A’ gabhail a-steach earrann sa Phlana a tha a’ còmhach dualchas cultarach. Bhiodh sin a’ gabhail a-steach mìneachadh air far a bheil e a’ freagairt a thaobh nan cuspairean agus gnìomhan a chithear san dreachd Phlana làithreach.

A’ gabhail a-steach gnìomhan a thaobh dualchas cultarach – a rèir a’ Phlana làithreach – gus dèanamh cinnteach gu bheil e cothromach a thaobh a bhith a’ glèidheadh agus ag àrdachadh an dà chuid dualchas nàdair agus dualchas cultarach. Bu chòir cànan is cultar na Gàidhlig a bhith anns an fhear mu dheireadh.

A’ mìneachadh an àite ann an dualchas cultarach a thathar an dùil airson Com-pàirtichean Lìbhrigeadh Taic leithid Bòrd na Gàidhlig, agus co-thaobhadh a’ Phlana ri Plana Gàidhlig ùr na Pàirce a tha ri thighinn. A bharrachd air a bhith a’ tabhann comhairle faodaidh Bòrd na Gàidhlig a’ Phàirc a chur gu na com-pàirtichean libhrigidh againn fhèin as urrainn comhairle agus taic a thoirt seachad air eileamaidean sònraichte de chànan is cultar na Gàidhlig.

Tha cothrom ann iomraidhean air cànan is cultar na Gàidhlig a thoirt a-steach aig diofar amannan ann an teacsa a’ Phlana. Mar eisimpleir:

*Tha sinn airson a h-uile duine a tha a’ fuireach agus ag obair sa Phàirc Nàiseanta no a’ tadhal oirre a thoirt leinn – mar phàirt de ghluasad dìreach gu àm ri teachd nas cothromaiche, nas uaine.* Bu chòir gun gabh seo a-steach luchd-labhairt agus luchd-ionnsachaidh na Gàidhlig.

*Le bhith a’ toirt tuigse làidir do luchd-tadhail agus coimhearsnachdan air nàdar, dh’fhaodadh iad a bhith a’ faireachdainn barrachd com-pàirt agus cumhachd gus cur ri oidhirpean gus a dhìon.* Tha dualchas cultarail a’ gabhail a-steach ainmean-àite Gàidhlig agus feartan cruinne-eòlasach a tha nam pàirt chudromach de thuigse nan ceanglaichean eadar nàdar agus cànan. Mar a tha Plana Gàidhlig gnàthach na Pàirce ag ràdh “Tha a’ mhòr-chuid de dh’ainmean-àite sa phàirc sa Ghàidhlig, a’ dèanamh a’ chànan aig cridhe tuigse agus eadar-mhìneachadh a’ chrutha-tìre prìseil againn”.

*Neartaich agus doimhneachadh na ceanglaichean eadar daoine agus na h-àiteachan sa bheil iad a’ fuireach – le nàdar, cultar agus dualchas ionadail a bheireadh a’ Ghàidhlig a-steach.*

*Eaconamaidh nas eadar-mheasgte le gnìomhachasan a’ soirbheachadh air feadh na Pàirce Nàiseanta an dà chuid ann an tuathanachas agus turasachd seasmhach, stèidhichte air nàdar, glèidhteachas nàdair, spòrs agus coilltearachd.* Bhiodh sin a’ gabhail a-steach ceumannan gus taic a thoirt do ghnìomhachasan a’ Ghàidhlig a chleachdadh mar so-mhaoin eaconamach nan gnìomhan m.e. margaidheachd, branndadh. Mar a tha an dreachd Phlana ag ràdh “*Is e seallaidhean-tìre, àrainneachd nàdarra agus **dualchas cultarail na Pàirce Nàiseanta an dearbh adhbhar gu bheil eaconamaidh turasachd ann***”. (cuideam air a chur ris).

*Sunnd.* Bidh cànan agus cultar a’ cruthachadh fèin-mhiadh, a’ brosnachadh fèin-mhisneachd, a’ mìneachadh fèin-aithne agus a’ leasachadh maitheas na beatha. Lorg rannsachadh a chaidh a dhèanamh ann an Glaschu<sup>3</sup> gun robh 77% den luchd-fhreagairt ag ràdh gu robh buaidh dheimhinneach “cudromach” no “meadhanach” aig a’ Ghàidhlig air an cuid sunnd agus sunnd an teaghlach. Chaidh a shealltainn cuideachd gun do chuir e gu mòr ri:

Meudachadh fèin-spèis / fèin-mhisneachd / fèin-luach.

Barrachd mothachaidh air fèin-aithne.

- Barrachd pròis anns a' choimhearsnachd ionadail aca.

Bidh tachartasan, eadar-mhìneachadh luchd-tadhail, msaa., a bhios gabhail a-steach cànan na Gàidhlig a' meudachadh sunnd luchd-cleachdaidh, luchd-ionnsachaidh agus luchd-taice na Gàidhlig – aig a bheil moit mhòr às a' Ghàidhlig agus a cultar.

Tha sinn an dòchas gu bheil an fhreagairt againn cuideachail agus taiceil. Feuch gun cuir sibh fios thugainn ma tha ceist sam bith agaibh no ma tha sibh a' sireadh soilleireachadh.

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## **Introduction**

Established under the Gaelic Language (Scotland) Act 2005, Bòrd na Gàidhlig is an executive non-departmental public body of the Scottish Government. It is the principal public body in Scotland responsible for promoting Gaelic development and providing advice to the Scottish Ministers on Gaelic issues.

The aim of the National Gaelic Language Plan 2018-23<sup>4</sup> is “that Gaelic is used more often, by more people and in a wider range of situations”. This will be achieved by focusing on:

- Increasing the use of Gaelic.
- Increasing the learning of Gaelic.
- Promoting a positive image of Gaelic.

This greater use of the language will, in part, be achieved through fully realising the social and economic benefits that Gaelic brings to Scotland. Our aim is that Gaelic is seen and heard on a daily basis across Scotland, such that it is widely recognised as an integral part of Scottish life and a national asset.

Gaelic is spoken across Scotland. Around 50% of Gaelic speakers live in the Highlands and Islands with the remainder in the rest of the country. At the 2011 Census 87,100 people in Scotland had Gaelic skills (around 1.7% of the population), of which 57,600 were Gaelic speakers. There is a growing demand for Gaelic language and culture with related educational, economic and social benefits.

Gaelic Medium Education is expanding across Scotland. It is now available in over half of Scotland's 32 local authorities. Gaelic Medium Education began in 1985 with 14 primary pupils. There are now more than 5,600 pupils in the sector across Early Years, Primary and Secondary education. Meeting continuing growth in demand will require investment in schools and teachers.

The demand for learning Gaelic is evident in the huge uptake of the Duolingo language learning app/website. Some 1.5 million people have started learning Gaelic on the app since the course launched over three years ago. The majority (71%) are from outside the UK, with 36% in the United States alone.

The launch of SpeakGaelic in October 2021 has also greatly contributed to resources for adults who want to engage with and learn the language. It has seen around 400,000 learners since its launch.

The “Scottish Social Attitudes Survey 2021: Public Attitudes to Gaelic in Scotland”<sup>5</sup> found that since 2012:

- The proportion who say they can speak at least the odd word of Gaelic has doubled from 15% to 30%.
- The proportion who say they can understand at least a little Gaelic has increased from 25% to 41%.

Further, 79% of people think Gaelic is either very or fairly important to Scotland’s cultural heritage.

A survey of young people (those aged between 11 and 26 years)<sup>6</sup> found that one third (33%) of respondents stated that they were learning Gaelic in some form. More than half (59%) of the respondents who could *not* speak Gaelic stated that they were interested in learning the language. Also, 72% of all respondents rated Gaelic culture and heritage as quite or very valuable.

## **Response**

**Bòrd na Gàidhlig are responding to this consultation because we would want the Plan to give sufficient recognition to cultural heritage - a key element of which is Gaelic language and culture.**

We generally support the Draft Plan’s themes of:

- Restoring Nature.
- Creating A Sustainable, Low-Carbon Destination.
- Enabling a Greener Economy and Sustainable Living.

However, there is an issue of the balance between the three themes and those relating to cultural heritage.

In describing the statutory role of the Draft Plan the document lists the four aims of National Parks:

- To conserve and enhance the natural and cultural heritage of the area.
- To promote sustainable use of the natural resources of the area.
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public.
- To promote sustainable economic and social development of the area’s communities.

This indicates that conserving and enhancing the natural and the cultural heritage are of equal importance.

The Draft Plan also quotes from section 9.6 of the National Parks (Scotland) Act: that the four aims “are to be pursued collectively. However, if there is conflict between the first aim and any

of the others, greater weight must be given to the first aim". Again, this points to the importance of cultural heritage.

Despite this there are very few (three) references to cultural heritage in the Draft Plan.

Further, Gaelic - which is a key element of the Park's cultural heritage - is not mentioned at all.

That is in contrast to the Park's current National Park Partnership Plan. This contains a reference to Gaelic under *Growing Tourism Markets*. That is in "Encouraging new and established tourism businesses to innovate and collaborate by capitalising on growing markets linked to a range of opportunities" which include "Cultural Heritage including Gaelic language" with Bòrd na Gàidhlig included as a Support Delivery Partner.

Gaelic is also included within *Health & Learning* with the statement that "The National Park's rich cultural heritage also provides a learning resource, including the promotion of the Gaelic language". Again, Bòrd na Gàidhlig is included as a Support Delivery Partner.

The Park has had a Gaelic Language Plan throughout the period of the current National Park Partnership Plan. It is currently developing a successor Gaelic Language Plan which will run for a five-year period.

The lack of references to Gaelic in the Draft Plan appears to conflict with the status that Park's current Gaelic Language Plan affords to the language:

- "Loch Lomond & The Trossachs National Park Authority recognises that Gaelic is an integral part of Scotland's heritage, national identity and cultural life"; and
- "The role of Gaelic in the history and culture of the National Park is significant".

The Park's current Gaelic Language Plan contains various commitments regarding the language. For example:

"We will continue to develop the Gaelic culture in the Park content on our website and will use it to promote the ways that people can engage with the Park through Gaelic related activities, such as the Gaelic John Muir Award delivered in partnership with the John Muir Trust and Comunn na Gàidhlig".

However, there is no reference to such actions or the Park's Gaelic Language Plan in the draft Plan as it presently stands.

It matters that the draft Plan contains very few references to cultural heritage and completely omits Gaelic. That is because, as the draft Plan states, the final version "will be *the* National Park Plan for Loch Lomond & The Trossachs National Park" (emphasis added).

The issues described above could be addressed as follows.

Including a section in the Plan that covers cultural heritage. That would include an explanation of where it fits vis a vis the themes and activities shown in the current draft Plan.

Inclusion of actions regarding cultural heritage - as per the current Plan - to ensure that it is balanced in terms of conserving and enhancing both natural heritage *and* cultural heritage. The latter should include Gaelic language and culture.

Setting out the role in cultural heritage envisaged for Support Delivery Partners such as Bòrd na Gàidhlig, and the Plan's alignment with the Park's forthcoming new Gaelic Language Plan. As well as offering advice Bòrd na Gàidhlig can signpost the Park to our own delivery partners who can provide advice and support on specific elements of Gaelic language and culture.

There is scope to include references to Gaelic language and culture at various points in the Plan's text. For example:

*We want to bring everyone who lives and works in the National Park or visits it with us – as part of a just transition towards a fairer, greener future.* That should include Gaelic speakers and learners.

*By giving visitors and communities a strong understanding of nature, they could feel more engaged and empowered to contribute to efforts to protect it.* Cultural heritage includes the Gaelic names of places and geographical features which are an important part of understanding the links between nature and language. As the Park's current Gaelic Language Plan states "Most place names in the park are in Gaelic, making the language integral to understanding and interpreting our precious landscape".

*Strengthen and deepen the connections between people and the places where they live – with nature, culture and local heritage* which would include the Gaelic language.

*A more diverse economy with businesses prospering across the National Park both in farming and sustainable, nature-based tourism, nature conservation, sporting and forestry.* That would include measures to support businesses to use Gaelic as an economic asset in their activities e.g. marketing, branding. As the draft Plan states "*The National Park's landscapes, natural environment and **cultural heritage** are the very reason there is a tourism economy*". (emphasis added).

*Wellbeing.* Language and culture create self-esteem, nurture self-confidence, define identity and improve quality of life. Research undertaken in Glasgow<sup>7</sup> found that 77% of respondents reported Gaelic having either a "significant" or "moderate" positive impact on their and their family's wellbeing. It was also shown to contribute strongly to:

Increased self-esteem/self-confidence/self-worth.

Greater sense of own identity.

- Greater pride in their local community.

Events, visitor interpretation, etc., which include the Gaelic language will increase wellbeing for Gaelic users, learners, and supporters - who have great pride in the Gaelic language and culture.

We hope that our response is helpful and constructive. Please get in touch if you have any questions or wish to seek clarification.

## **Respondent 35:**

### **Individual response**

Thank you for the opportunity to comment on the draft LL&TNP Partnership Plan. The new focus on life and climate in the Plan is welcome and clearly the report's writer/s have a deep appreciation and gratitude for nature and how it sustains us.

While the Plan is well written, it desperately needs a vision many more people will be attracted to buy into. Words are cheap and easy these days, so cut them to the bone and ensure there is absolutely no repetition in the Plan so people might not get bored and may actually read it (or a summary of it). 'Now. Here. Us.' .....is a good start. There needs to be a much sharper sense of jeopardy, honesty and strength throughout - we know the nature/climate cliff edge is very close and there is no sign 99% of individuals think they bear any responsibility for the nature/climate emergency or have any intention of modifying their behaviours to reduce their consumption or carbon footprints. This is particularly true of people who extract most from nature - politicians, business people, celebrities, public service providers.

Regarding widely publicly shared comments on your Plan that a 'National Park is Not a National Nature Reserve', I believe a National Park is a place where nature and people should be of equal standing - a place where people support nature as much as nature supports people.

Cowtowing to vested interests is taking us all to hell. Sheep damage the land and hinder regeneration of native trees more than deer. Sitka spruce (and other non-native conifers) is self seeding out of plantations all over the NP (and Scotland as a whole). The insanity of providing rich investors and landowners with public funds to plant sitka while also encouraging charities and communities to beg for funds to remove it as an INNS beggars belief. It really is past time to face up to forestry, farming, huntin', fishin' & tourism.

Continually building new facilities while neglecting existing facilities (which are often better built with better materials) and leaving them to rot is mad. Tearing up precious native and semi-native woodland for recreation is teaching youngsters and families that nature is worthless. Planting saplings in plastic tubes, that often bend or fall over, in places where natural regeneration can easily do this job for free is a waste of everyone's precious time and again teaches people that nature is useless and must always have human interference. Human interference is needed to remove the INNS conifers that are taking over our land and that Scotland has no defence against.

- **Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver? What role can you play in delivering these?**

I am an ex-journalist, project manager & community development specialist campaigning very hard for greater protections for ancient & native woodland and against further expansion of INNS conifers.

Balloch Castle Country Park, as an INNS nightmare, provides a unique opportunity to engage with millions of people via low carbon transport direct from Glasgow on learning about nature and how to care for it. People are blind to nature loss and need to be shown what has gone wrong - BCCP could be the place where people are supported to identify the problems, understand how these can be tackled and help to turn things around.

- **Are there any challenges or barriers we need to overcome to help you do this?**

People are blind to nature loss. I am already doing everything I can to work with others to encourage them to understand what is native and why we need it, as well as what is invasive and why this is often a problem.

Nature loss is at the bottom of most priority lists in statutory authorities and business. This is particularly the case with local authorities. Even organisations like SEPA, NatureScot and Scottish Forestry, who are paid to protect nature, are utterly spineless, focussing instead on placating the polluters and nature abusers. Scottish Forestry hasn't taken forward with the Procurator Fiscal a single action against unlicensed felling in ancient woodland for at least 13 years. They focus instead on processing afforestation plans that facilitate the dominance of sitka spruce on the Scottish landscape, in spite of Scotland already being a net exporter of timber.

LL&TNP must lead the local authorities on nature and climate. An annual summit, inc public access, with LAs is essential to share 'the vision' and to give people the opportunity to engage and influence what actions are being taken to address these emergencies.

People in communities who care about nature and climate are completely disempowered at worst and humoured at best by entrenched statutory systems, staff and political views. Hard-working nature volunteers are blocked from taking the initiative. LAs and other statutory bodies do not behave in any way that reflects the declared climate emergency. Token attempts to deal with global warming and nature loss are just as dangerous as the sham of paper only nature protections which create the illusion of action.

- **Can you suggest any other objectives or actions to help us meet our aims in each area of the Draft Plan?**

For general awareness raising, get advocates to communicate your vision for you - sports people, celebrities, artists who care about nature/climate and are admired/respected by different groups.

For targeted action, bring all the big landowners together on a regular basis and ensure they buy in to 'the vision'.

Get the Plan into every school and into every curriculum.

- **Can you suggest any other delivery partners needed to help deliver these?**

Politicians must get out of their comfort zones and be shown and educated about what the nature/climate crisis is. Most really don't have a clue about Scotland's natural history and it's only when they see, for example, temperate rainforest being completely invaded by sitka and ponticum that they begin to understand.

All education institutions need to be educated about nature loss. Every single teacher, lecturer, classroom assistant and principal needs to go on field trips to learn to understand their country.

### **Respondent 36:**

#### **Association of Deer Management**

Thank you for the opportunity to respond to the draft National Park Partnership Plan, I write to you on behalf of the Association of Deer Management Groups. ADMG welcomes the creation of a new Park Plan that enables land managers to help deliver some of the ambitious biodiversity and climate targets set out by Scottish Government. However, we do have concerns about some areas of the draft plan which we highlight below.

We are pleased that the draft plan does not focus purely on deer but also recognises the important role that sheep grazing and other herbivores play within the Loch Lomond and Trossachs National Park. It is likely that since the inception of the park sheep and deer numbers have reduced and are likely to continue to reduce in line with government policy. This should be noted within the draft plan which currently paints a more negative picture of land management.

Land managers currently await the outcomes of the Land Reform consultation, the Agricultural Consultation, the Forestry Grant Scheme consultation as well as the implementation of a new Natural Environment Bill which will include many of the recommendations within the Deer Working Group report. ADMG are very pleased to note that the draft plan recognises the current uncertainties that are inhibiting decision making for land managers including an underdeveloped carbon market. It would be extremely helpful if the Loch Lomond and Trossachs National Park could urge Scottish Government to provide some clarity for land managers and rural communities on future support mechanisms that would enable them to make the changes in the draft plan.

The draft plan refers at several points to high livestock and deer numbers. High livestock numbers are directly a result of minimum stocking densities implemented by Scottish Government which incentivises heavy grazing. Meanwhile government targets for reduced deer numbers represent a conflicting vision for the uplands that is inconsistent and unhelpful. ADMG would welcome a clear strategy for both with joined up thinking that would provide a holistic approach to land management and a clear vision for the uplands.

We note that the objectives in the draft plan by 2030 include '*developing a Herbivore Strategy with the intention to drive forward a significant reduction in unwanted impacts from grazing animals across the National Park*'. Whilst we understand the rationale behind this it is important to point out that currently many land managers require the income associated with deer management to enable continued employment in this sector, this should not be lost in the development of any park plan. There is reference within the draft plan of the need for skills development in deer management and an increased investment in the future of deer management in the National Park, this would indeed be beneficial, helping to enable and support the deer managers of the future is vital.

The draft plan refers throughout to herbivore pressures, not just deer, this is welcomed by ADMG but, to state that current levels are 'unsustainable' is unhelpful when deer densities vary throughout the park and in many areas have already reduced. We note that there are hopes for tree regeneration following herbivore reductions but we would caution against high expectations of natural regeneration in many parts without either deer or stock fencing. The absence of any seed source in many sites will also necessitate tree planting which can often be difficult under the current Forestry Grant Scheme and in most cases will need either stock fencing or deer fencing.

Under the section: Who Needs to Be Involved? ADMG notes that the National Park recognises the important part that Deer Management Groups will play and we would urge the National Park to liaise closely with DMGs prior to the implementation of the park plan and that deer management expectations are realistic and enable individual landholdings to maintain employment from deer management. Avoiding a 'one size fits all' approach to deer management will be vital in encouraging deer managers to continue to work closely with the National Park. We are heartened by the Strategic Deer Board's current discussions around incentives for deer management and we would hope that this could be implemented within the National Park, currently very little funding is available for deer management in Scotland when compared with other land management priorities.

Whilst the draft park plan should be lauded for its ambitious objectives ADMG must insist that the National Park takes a constructive role when liaising with deer managers and we would caution against using phrases like '*Landscape-scale management to significantly reduce unsustainable deer and sheep grazing and browsing pressures*'. Deer management like sheep farming has been a major employer within the National Park for many years and maintains a significant cultural importance in many of the national National Park's rural communities. This must not be lost in the ambition of the plan.

Deer managers have already been contributing towards important targets though tree planting, peatland restoration, Habitat Impact Assessments and deer counts and I am sure will be able to continue to aid the National Park with its new plans but, recognition of good work where it has currently taken place and the significant contribution that already been undertaken by deer managers would be helpful in providing a positive context for this National Park Plan.

ADMG thank you for the opportunity to comment on the draft Loch Lomond and Trossachs National Park Partnership Plan and hope the importance of deer management will be central in delivering the National Park's objectives without threatening the socio-economic benefits that deer management also provides.

### **Respondent 37:**

#### **Architecture and Design Scotland**

Thank you for the invitation to comment on the LLTNP partnership plan. At Architecture and Design Scotland, it is our strategic aim to **see the benefits of the Place Principle become an everyday reality in the way Scotland's places are created, adapted and sustained. We advocate collaborative approaches that take the whole place into account, and aims to align interventions to contribute to a range of outcomes.** We are currently looking at the consultation on the appraisal framework for New National Parks and have reacted to the prominent absence of "place". We see the LLTNP Partnership Plan as a good example of how people and place must be at the heart of any existing or new national park(s).

Comments in brief:

- We will refer to this as a good example counterpoint in a response to the New National Parks appraisal framework
- We really like the way the document is structured and colour-coded in a way that makes it easy to absorb despite being very long.
- We do think that it could do more to incorporate ways to visualise the vision in terms of drawings, diagrams, maps and infographics that would provide more tangible information than only inspirational/mood setting images. It could be possible to draw on the Hagshaw development framework for this. [A Development Framework for the Hagshaw Energy Cluster](#)
- In addition to this we think there could be great benefit in considering where different priorities are most important and how they overlay or not, e.g. population centres, natural capital investment, nature restoration, visitor services etc.

- It is important to consider the national park as a place, or network of places, and we think that comes through well. It could explicitly refer to the Place Principle as we feel that is in fact what it is describing using different words.

We do hope this will be of help and please don't hesitate to contact us further on similar matters.

### **Respondent 38:**

#### **Chartered Institute of Ecology and Environmental Management**

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 7,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

1. Scottish Environment Link
2. Wildlife and Countryside Link
3. Northern Ireland Environment Link
4. Wales Environment Link

5. Environmental Policy Forum
6. IUCN – The World Conservation Union
7. Professional Associations Research Network
8. Society for the Environment
9. United Nations Decade on Biodiversity 2011-2020 Network
10. Greener UK
11. Irish Forum on Natural Capital (working group member)
12. National Biodiversity Forum (Ireland)
13. The Environmental Science Association of Ireland

CIEEM has approximately 740 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by Members of our [Scotland Policy Group](#).

### **Overarching Comments**

This is an ambitious plan recognising the scale and urgency of change that is required. National Parks need to be the foci for nature restoration at a faster and larger scale than what may be possible elsewhere. There are clearly defined aims and objectives and SMART targets throughout which we are very pleased to see as well as clear recognition of the key drivers of biodiversity loss. As the document is long it would be helpful to have the SMART targets compiled in a table so that the actions and deliverables can be clearly viewed. Parallel to this it would be good to see an implementation plan with clear deliverables that is signed up to by the various agencies and stakeholders.

#### **» Which of the objectives and actions outlined in this Draft Plan can you or your organisation help to deliver?**

CIEEM is a professional body representing ecologists and environmental managers. Many of our members will work in the various organisations that work within the Loch Lomond and Trossachs National Park.

Therefore, although as an organisation we can't directly help to deliver the actions outlined we can play an important role in disseminating information via the Scottish newsletter, sector news, social media channels and by hosting member network events within the LLTNP to share best practice and experience.

#### **» What role can you play in delivering these?**

As above

» **Are there any challenges or barriers we need to overcome to help you do this?**

N/A

» **Can you suggest any other objectives or actions to help us meet our aims in each area of this Draft Plan?**

See detailed comments in the comments on policies section.

» **Can you suggest any other delivery partners needed to help deliver these?**

Neighbouring landowners and stakeholders that operate in the LLTNP need to be involved in the delivery. This is particularly the case with control of Invasive Non-Native Species (INNS). For example, control of riparian invasive plants has to be conducted across the whole catchment with upper reaches of the catchment focussed on initially. If there is one landowner who is not engaged and thereby the INNS are not eradicated for that area re-invasion will occur downstream, eradication is not achievable, and control will need to continue in perpetuity with associated economic costs. INNS issues are by nature cross-border and will require co-ordinated action across the boundaries of the LLTNP.

» **Do you have any comments on the policies outlined in each area of this Draft Plan?**  
**Timescales**

There is a mix of timescales used in different sections. For example:

*On pg 42 - AIM BY 2045. The ongoing decline in nature in Loch Lomond & The Trossachs National Park will be reversed by 2030 and there will be widespread restoration and recovery of nature by 2040. A landscape scale Nature Network approach will be taken, improving and connecting core areas and expanding the links between these core areas across the National Park.*

So is it 2040 or 2045? Likewise:

*AIM BY 2045 Our ecosystems are in good health and helping us to adapt to and mitigate against the climate crisis, supporting the National Park to be an overall net carbon sink for Scotland.*

Yet elsewhere, it states that LLTNP will become a *Net Zero National Park by 2040* and online 2030 is stated as the goal.

We applaud the ambition of the plan and the fact that LLTNP is leading the way to *become a Net Zero National Park*. The recognition that the pace and scale of peatland restoration and

new woodland creation will need to step up considerably and the need to secure both public funding and private investment to achieve this is very welcome.

Therefore, there just needs more clarity on the target timescales. Would it make more sense to align with the Scotland wide plans to reach net zero by 2045, with interim targets of 75% by 2030 and 90% by 2040. Likewise, the Scottish Biodiversity Strategy timescales of 2030 and 2045. The ambitious strategic landscape scale aims, and objectives outlined in the draft plan will hopefully mean that the targets will be reached early.

### **Invasive Non-Native Species (INNS)**

We are pleased to see INNS highlighted. The IBPES identifies Invasive Non-Native Species (INNS) as one of the five direct drivers of global biodiversity loss<sup>1</sup>. It is also one of the top drivers of loss in Scotland<sup>2</sup>. The condition of protected areas – our most important spaces for nature – has not significantly improved over the past 15 years, and invasive species are the single biggest pressure affecting these sites<sup>3,4</sup>. Our native woodlands, including our globally significant temperate rainforest, are under immense pressure from the spread of *Rhododendron ponticum*<sup>5</sup> and this is a particular issue within LLTNP.

### **Access**

The National Access Forum should be added to the list on page 50. The National Access Forum has recently been working on actions to reduce disturbance to wildlife from access takers. There is no mention of the Scottish Outdoor Access Code in the plan. Nor are there any mentions of disturbance by dogs; this is particularly relevant for ground-nesting birds.

### **Climate Change Impacts**

Wildfires are mentioned as a risk on pages 19 and 100 but no actions are proposed to help protect the park from this risk, unlike flooding. Increasing risk of wildfires with climate change and ongoing visitor pressure leading to an increasing number of accidental fires requires that a clear vision and actions are needed. The effects of climate change will need to be effectively monitored to ensure adaptive management occurs to assist the positive trajectory to nature recovery and restoration.

### **Planning**

To ensure a long-term and just transition to a net zero, nature-positive economy there needs to be clear policies and implementation measures to ensure that environmental considerations are given true weighting over and above traditional economic considerations

including planning. The most salient point of the Dasgupta review<sup>6</sup> is that “Our economies, livelihoods and well-being all depend on our most precious asset:

Nature. Truly sustainable economic growth and development means recognising that our long-term

prosperity relies on rebalancing our demand of nature’s goods and services with its capacity to supply them. It also means accounting fully for the impact of our interactions with Nature across all levels of society.” The findings of the Dasgupta review can help inform policy direction in the National Parks where tensions arise in planning between economic opportunities/ drive for productivity with climate and biodiversity objectives.

*Pg 108 - Ensure new development delivers positive outcomes for nature through securing biodiversity net gains on site and investing in local nature networks identified as part of the development of the new Local Development Plan.*

In terms of securing net gains will LLTNP as a planning authority be looking for the use of metrics in planning applications to determine measurable impacts? Or where metrics are used in a planning application, welcome them? The Scottish Government has adopted the use of ‘positive effects for biodiversity’, how will this be measured to ensure that positive effects for biodiversity are delivered and evidenced?

Links should be made under Sustainable Living section to 20 minute neighbourhoods and local living<sup>7</sup> that is currently being consulted on by the Scottish Government.

At a CIEEM event which brought together representatives from more than 70% of LPAs throughout Scotland to discuss NPF4 and the Developing with Nature Guidance<sup>8</sup> and in a subsequent survey on ecological capacity and expertise within Local Planning Authorities key concerns were raised<sup>9</sup>. These centred on lack of ecological capacity and expertise and lack of enforcement staff to ensure compliance. Two-thirds of respondents rated lack of enforcement as a high or very high risk to their LPA's ability to implement NPF4 and Positive Effects for Biodiversity. Without in-house ecological expertise in local authorities, positive effects for biodiversity cannot be measured in a consistent way. Likewise, there should be well resourced qualified Planning Enforcement Officers to ensure tree protection and biodiversity enhancement measures are realised. The expertise and expectations of planning and ecological staff needs to be clear so that individuals are not having to make professional judgements outside their area of expertise and competence. Ecological capacity should be reviewed within LLTNP and training needs assessed and addressed as necessary.

## Regional Land Use Partnerships

We would welcome the creation of a Regional Land Use Partnership (RLUP) and we note that this is proposed.

*Facilitate a Regional Land Use Partnership and prepare a Park-wide Land Use Framework setting out collaborative land use change objectives and priorities across multiple land holdings at a landscape scale.*

We strongly suggest that this also includes land managers of neighbouring estates outwith the park. Nature recovery actions should be holistic and be embedded across the landscape and linking with nature networks outwith the park boundary. There will be important lessons learned from the existing trial of RLUPs that should be considered.

There is also mention of a Nature Restoration Land Forum. How would this relate to a Regional Land Use Partnership and Framework?

On pg 43 it states - *Create a Nature Restoration Land Forum that coordinates and supports this approach*

*across the National Park and contributes to the implementation of Scotland's 30x30 commitment.*

## Maps

It is really helpful to see the maps for woodland, peatland and water quality. With the peatland cover map, it displays broken peatland, would this map be updated to incorporate strategic priority restoration areas?

For the map displaying existing native woodland cover, productive conifer and native woodland creation opportunities does native woodland creation opportunities encompass native tree regeneration or just planting and if both can this be highlighted and assigned.

Reference should be made to the extent of productive conifer and whether any of this will be felled to create future native woodland opportunities. Also, consideration needs to be given to Sitka spruce regeneration and impacts on neighbouring land and potential native woodland creation areas. The BSBI Plant Atlas 2020 found that Sitka spruce had the greatest increase in range of any species covered by the project, with researchers warning of the need to carefully control and manage its spread<sup>10</sup>. A programme of action to remove and prevent further incursion of non-native conifers onto peatlands and other important open country habitats is required. This is a rapidly intensifying problem and will consume future conservation budgets without urgent action.

## Green Jobs, Skills and Business Opportunities.

Recognition is rightly given to the importance of developing and delivering training and further education opportunities that meet the anticipated demand from scaling up climate and nature restoration projects as well as regenerative agriculture and sustainable forestry. Our Green Jobs for Nature website<sup>11</sup> is packed full of information about what a green job is and how to get one to inspire the next generation of ecologists and environmental managers. There are also over 100 profiles<sup>12</sup> from people working in ecology and environmental management roles describing their jobs, how they got into the profession and sharing their career tips. If we can support the work of LLTNP in this area, please get in touch. Likewise, if we can help with our extensive programme<sup>13</sup> of member network events, in-person and online training, webinars and conferences please let us know.

## What Could it Be? sections

Although we appreciate what the intention is with the 'What could it be' sections, the language in the sections does not always reflect the ambition elsewhere in the document which might lead to confusion and devaluing the ambition elsewhere in the plan. As an example, in the 'What could it be?' section on pg 41 - *Invasive NonNative Species could be reduced to no longer threaten our native ecosystems and more naturalised water courses could become slower and cleaner flowing.*

The language here should be strengthened. INNS as a key driver of biodiversity loss 'should' rather than 'could' be reduced.

### » Do you have any comments on the measures of success proposed? How can you help us to measure them?

We are pleased to see that in each section of the Draft Plan there are proposals for how might measure success against the draft objectives being put forward. This is critical as only by establishing a robust programme of monitoring will we know if the strategies are a success and if not, how they can be adapted to make them so. Need to ensure that ecological expertise is woven into the decision-making process. It would be good to include these measures of success in a table so targets can be clearly seen.

**Water quality:** Will the ecological status of target waterbodies at key restoration sites (and a 'control group' of waterbodies for comparison) be monitored in the context of the Water Framework Directive via River Basin Management Plans or by other mechanisms and if so, how will these relate to the Water Framework Directive?

**Invasive Non-native Species:** *Track the extent and distribution of target Invasive Non-native Species. See a demonstrable, ongoing decline that is consistent with halting the decline of nature by 2030.*

This is quite generic and hard to know how you will evidence a demonstrable ongoing decline. Will distribution and abundance be assessed? What are the target species that will be monitored? Overall, there may be increases in some invasive species and declines in others. A more targeted approach of assessing impacts is to look at occupancy and abundance of a number of key invasives that are known to threaten habitats of conservation concern within the LLTNP. For example, *Rhododendron ponticum* spread in Atlantic rainforests. The eradication or long-term control of well and widely established INNS must be undertaken using planned and strategic operations, with clear and specific environmental/ecological outcomes based on monitoring. Action must adopt and build on best practice.

### **State of Nature monitoring and reporting system for LLTNP**

We note with interest that you are thinking of a State of Nature monitoring and reporting system for the NP. *A State of Nature: Baseline assessment is proposed to be completed in 2023, and measured every 5 years thereafter.*

It makes sense to conduct a baseline assessment in 2023 to coincide with the State of Nature report at the end of September 2023. However, this is a significant amount of work, so we question whether resources are in place to conduct it in the timescale and work alongside/learn from those involved in the State of Nature report. We also note that the outcomes from this consultation will be reviewed and adopted by the board in 2024 so not sure how these timescales align.

### **Demonstration Sites**

We would like to see evidenced outcome-based examples within the LLTNP. These could be used as demonstration sites to inspire and share good practice. These should be at a range of scales including a larger landscape scale project.

### **Respondent 39:**

#### **Highlands and Islands Enterprise**

- **Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver? What role can you play in delivering these?**

Within the partnership plan, the objectives of **Transition to a greener economy** and **Low Carbon businesses** correlate strongly with HIE's own ambitions and priorities. HIE is

currently delivering activity which sits within these objectives, including provision of business support and funding to facilitate carbon reduction. Our current Green Grant Fund <https://www.hie.co.uk/support/browse-all-support-services/hie-green-grant-fund/> aims to help businesses and social enterprises to reduce or green their energy use and make progress towards achieving net zero carbon emissions. Specific actions on closer working to build and retain local economic wealth and growing the local workforce aligns with HIE's own priority to support community wealth building approaches.

The objective of **a wellbeing economy** and in particular the action to ensure new housing more closely corresponds to identified requirements of communities and the local labour force resonates strongly with the findings of HIE's business panel survey. Availability of labour and attract new staff is a regularly cited as a risk to business and staff accommodation referenced as a risk factor. <https://www.hie.co.uk/research-and-reports/businesspanel/>

A first meeting of the Highlands and Islands Regional Economic Partnership housing sub-group took place in early July 2023. Chaired by HIE Chief Executive Stuart Black, the focus will be on actions to address the business need for suitable accommodation to be available for existing employees and new recruits, enabling businesses to grow and more people to remain in the region.

The objectives of **A Sustainable Visitor Economy** align with HIE's priorities for the tourism sector and developing a Multi-year Place Programme through partnership and co-ordinated investment is welcomed. The inclusion of Benmore as a Priority Location is welcomed and HIE would be pleased to engage further in due course.

Within the restoring nature priority, the objective on Green Jobs, Skills and Business Opportunities resonates with HIE's approach to net zero. HIE has undertaken extensive research through a partnership of private, public and community representatives in Argyll and Bute working together with research specialists to quantify the potential of carbon sequestration.

Further details and recommendations from this work can be viewed <https://www.hie.co.uk/media/13077/carbon-sequestration-prospectus.pdf>

- Are there any challenges or barriers we need to overcome to help you do this?

HIE is well placed to provide business support, working closely alongside Business Gateway, noting that the operational area of Highlands and Islands Enterprise overlaps the National Park in part only. There are ongoing challenges in the transition to net zero, not least developing business awareness, understanding and planning, the associated cost of implementing plans and availability of funding.

- **Can you suggest any other objectives or actions to help us meet our aims in each area of the Draft Plan?**

The objective of **identifying development needs and opportunities** and responding actions should be broadened to include the Strategic Transport Projects Review (STPR) and STPR 2 commitments to upgrades to the A82 at Tarbet to Inverarnan and the A83 Rest and Be Thankful (R&BT). These upgrades are committed strategic transport network improvements to ensure safe and efficient movement of strategic long-distance traffic between major centres.

As is recognised by all concerned, the situation with the Rest and Be Thankful represents an ongoing emergency for Mid-Argyll, Cowal, Kintyre and the majority of Argyll and the Islands' 23 islands. Expediting this STPR2 project is of fundamental importance to the outlook for affected communities in terms of economic prospects and reversing trends of population decline. In relation to the A82 Tarbet to Inverarnan it is noted that the eventual route must be both sensitive to the environment and natural heritage and feasible from an engineering perspective. We would also note that, like Rest and Be Thankful, the A82 Tarbet to Inverarnan upgrade is increasingly urgent. This severe bottleneck on the main artery road to the west Highlands – serving communities, business and the visitor economy – is troubling from both economic, safety and community perspectives.

Whilst the delivery of these two major projects rests with Transport Scotland, the critical nature of these infrastructure improvements does need to be sufficiently emphasised within the National Park Partnership Plan.

- **Can you suggest any other delivery partners needed to help deliver these?**

The list of organisations who need to be involved is comprehensive.

- **Do you have any comments on the policies outlined in each area of the Draft Plan?**

No specific comments but would be pleased to engage further and discuss further any aspect of HIE's submission.

- **Do you have any comments on the measures of success proposed? How can you help us to measure them?**

Does the measure of car usage to and within the National Park differentiate car usage through the park as a transit route only, rather than a destination?

**Respondent 40:**

**Loch Lomond Steamship Company**

**1. Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver? What role can you play in delivering these?  
National Park Objective – “Creating a sustainable, low carbon destination”**

The LLSC completely supports this objective, and also recognises the importance of developing Balloch further as a key transportation hub.

When the Maid of the Loch returns to passenger sailing once again it will be as a significant international visitor attraction, and our ambition is to be a key part of an integrated transportation solution for the Loch and its multiple communities.

This solution should not only reduce the volume of vehicles attempting to access the Park, but should aim to increase and improve accessibility for the wider public.

The Maid of the Loch will provide access across the entire Loch and to a broad spectrum of visitors, including cyclists, walkers and hill climbers.

In addition to lowering the volume of private cars accessing the Park, there may also be opportunities for commercial deliveries by the ship, contributing to a reduction in commercial vehicle activity within the Park.

The LLSC has also engaged with the Naval Architectural Faculty at Strathclyde University to explore emerging technical solutions and options for eliminating exhaust pollutants, to significantly reduce the future carbon footprint of the Maid of the Loch.

Another part of providing an integrated transportation solution, could be the provision of “Park and Ride” facilities in Dumbarton, with rail transport from Dumbarton to Balloch.

Improved connectivity between the Railway Station at Balloch and the Loch side would also be desirable.

To significantly deliver the objective of a sustainable low carbon destination, a multi- agency approach that reaches beyond the Park’s physical boundaries, and one with the Maid of the Loch playing a central role, needs to be adopted.

**2. Are there any challenges or barriers we need to overcome to help you do this?**

*“Support local communities to influence how land and sites are used within and around towns and villages and ensure the benefits arising from this are retained and circulated locally, including greater influence via partnership working with public and private sectors and landowners and/or potentially through more community ownership of land and assets.” –*

**Draft Plan p109**

Currently there is no joined-up land use strategy for the key areas around Balloch Station and the Pier. There are connectivity issues and transport issues to consider.

To reinvigorate Balloch as a fully integrated transportation hub, and to achieve the objective set out in (1) above, there needs to be a multi-agency approach to land use planning.

There is a disconnect between Balloch Station and Balloch Pier, and existing vehicular traffic arrangements in the vicinity of both the Pier and the Duncan Mills Memorial Slipway are unsatisfactory, particularly when there is high demand for use of the slip.

As a major long-term presence in Balloch the Maid of the Loch will, once sailing commences again, dramatically increase visitor interest and visitor numbers to the Pier and the immediate surrounding area. It is therefore imperative that, collectively, the right vision is put in place.

The LLSC is fully committed to work closely with all relevant agencies to help develop a strategic long-term masterplan for the land corridor between the Station and the Pier.

## **Respondent 41**

### **Luss Estates**

I note that the National Park's online consultation is structured to only gather views on the delivery and individual objectives of the Loch Lomond and Trossachs National Park Authority (LLTNPA) strategy, it does not seek input or views on the main thrust and principles of the strategy itself. Without understanding the legal requirements of the consultation, we would question this approach. This is a crucial strategy document that is going to shape the future of the area for many years to come and impact on individuals, communities, and businesses. Surely the principles of the strategy should be consulted on, not just delivery? In our view therefore the online consultation is flawed and incomplete. Please therefore consider this letter to be a consultation response to the main strategy itself. I confirm that you will find attached our formal consultation responses to the specific questions raised online.

**Concerns over the net zero goal** - we all accept that we are facing issues around climate and biodiversity and understand the basis for the goal of net zero by 2040. However, we note that there is no analysis or route map to back up this statement. Whilst we support the principle of cutting back on carbon emissions we must also be asking: at what cost is this to be achieved? Is the LLTNPA strategy setting out that this is to be achieved regardless of the cost to local communities and the local economy? We are concerned that this strategy set out in the NPPP will lead to long term economic and social decline in the National Park. At the very least, the LLTNPA should evidence-base the route map to delivering net zero and set out how the rural population and economy will not be negatively impacted.

The plan also aims to achieve net zero within the National Park by exporting carbon producing activities outside the National Park – this feels utterly disingenuous. Examples are green energy production, food production (sheep and cattle as carbon producers), and business activity to fund landscape scale natural capital projects.

**Concerns over a strategic gap between the new and old world causing long term social decline and economic cost** - In considering our response we feel it vital to anticipate the combined effects of both the NPPP and the LLTNPA translation of National Planning Framework 4 (NPF4). Our view is that the Park's interpretation of NPF4 and this NPPP will likely result in almost no new development happening in the National Park, whether commercial or residential. In effect the core LLTNPA aim will become to prevent new things from happening, in the process limiting new job creation and economic opportunity, and thus community sustainability. At the same time, given the NPPP assumption that the herbivore impact must be reduced – that is to say, hill farming – then there will be a decline in employment in the traditional agriculture sector. The National Park is home to a thriving hill farming community, but the stated strategy is that these jobs and the associated cultural heritage must be replaced by new “green” jobs coming out of the landscape scale restoration industry – in other words peatland restoration and woodland planting. The problem here is that these “green jobs” already exist, however the vast majority are based outside the National Park and are typically contractors coming into the area to do short term but intense

contract work. They are highly unlikely to be based in the small rural communities of the National Park.

Thus, we see the probable end result of the LLTNPA main NPPP strategy being no new development and associated new jobs, combined with declining permanent rural jobs. In other words long term rural community decline. *This is not an acceptable strategy and hidden between the lines of the NPPP document runs completely counter to one of the six Spatial Principles set out by the Scottish Government in NPF4 – namely: Rural Revitalisation – where the government state that they will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.*

**Concern over the exporting of green energy production** - Another element of the strategy of concern is the lack of encouragement of, or scope for new green energy creation. The strap line of the NPPP is “Here, Now, All of us” – a piece of sloganizing that appears to mean that we should all be doing our bit to solve the climate crisis. That being so, as a responsible local authority the LLTNPA must surely be seen to be in the forefront of promoting new green energy production. Whether justifiably or not, the NPPP makes very clear that large scale windfarms will not be supported, either in or adjacent to the National Park. What it does not say is what forms of green energy the LLTNPA **will** encourage or support. Simply exporting the issue to the rest of the United Kingdom is not acceptable. I note that the results of the combined actions of the Holyrood Parliament, and the LLTNPA as the planning authority, has been to halt the development of new hydro electricity generation. We are unsure of the LLTNPA view on solar farms or battery facilities or any other new form of green energy production.

**Concern over the exporting of commercial activity to fund landscape scale natural capital projects** - The LLTNPA, through the National Parks UK and its tie up with Palladium, accept that funding landscape scale nature restoration is difficult, and will require external investment. The combined effect of NPF4 and the NPPP means that all this funding will come from outside of the National Park, as no new sizeable commercial development that might be able to cross-fund such work, is likely within the National Park. This feels wrong and is another example of the LLTNPA exporting carbon problems outside of the National Park. Why is it acceptable to import funds from commercial activity elsewhere around the world, and yet not allow it within the National Park, where it can be controlled and managed properly, and where it could help create new jobs and opportunities for local people?

**Concern of the public funding gap** – many aspects of the NPPP are based on the assumption of future public funding, in the areas of, for example, the future provision of public transport, the management of excess visitors, or the clearing and management of marine litter. And yet, experience shows that it is most unlikely that the public funds will be available for such initiatives – they certainly aren’t available today. Assuming little or no new commercial development is likely, then there is little chance of the private sector being able to cross-fund such work.

**Concern over political statements and evidence base** - we feel that references to political issue of Brexit, which is mentioned a number of times as a contributing factor to the current ills within the National Park and Scotland, are wholly inappropriate. If such overtly political

claims are to be made then equal weight should be given to alternative views and issues. It belittles the LLTNPA and the importance of the document to be so political.

The NPPP document is crucial to the future of the National Park – where claims are made they should be referenced as though it were a scientific paper. For example evidence should be provided to support the claims that climate change is going to lead to a net increase in veterinary and medicine costs to hill farmers; an increase in algae blooms and tree disease; that landslips are increasing only due to climate change; and that all nature loss is due to climate change, when it is widely accepted that much of the nature loss within the National Park is currently due to increased, uncontrolled and unmanaged visitor numbers. In order for such hyperbole to be accepted incontrovertible evidence must be shown. It has not been.

The NPPP makes reference to the LLTNPA stewardship of the National Park but gives no credit to the work and effort over many centuries made by private landowners. The main reason the National Park looks so beautiful and is such a bio-diverse landscape is as a result of these efforts, and we feel that the NPPP document should acknowledge this. From a historical perspective the LLTNPA has thus far had a very limited effect, given that it has only been in existence for a little over 20 years, but we absolutely accept that we now have a joint responsibility going forward to continue this excellent historic work.

**Concerns over landscape scale natural capital projects in light of the Asulox ban** – the decision of the SNP/Green Coalition to ban the use of Asulox for controlling bracken will have a huge impact on the ability of landowners to deliver new woodland plantations, or to promote natural regeneration. As you know Luss Estates Company is working on a significant potential scheme, and this ban will make very large proportions of the plan impossible to deliver. **Deep bracken by definition means no tree growth** – young trees are simply outcompeted and die under the bracken cover. On the terrain the LLTNPA hope to establish natural capital projects on, there is no alternative to the use of this herbicide. The result of the ban therefore will be the removal of land from such projects where the risk of non-establishment of trees is too high. The whole thrust of the LLTNPA NPPP plan is undermined by this absurd and unnecessary decision, and whilst we acknowledge that it is a Scottish Government decision not a LLTNPA one, it should be robustly challenged by the LLTNPA. There will be many fewer landscape scale woodland projects resulting from this; land that could have been used to capture carbon will instead be left to grow bracken. How this will benefit anyone is a complete mystery.

You will find attached a document detailing our specific responses to the questions posed in the online questionnaire. I urge the LLTNPA to address the issues we have raised above in a revised NPPP and am happy to meet to explain our feelings further and to propose additional alternative choices that might better protect the National Park and address our concerns

*Restoring Nature*

Aims and Objectives

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

Peatland	<ul style="list-style-type: none"> <li>• Luss Estates Company will take a proactive approach to reducing carbon emissions on the Estate on a landscape scale, and increasing biodiversity – including trees, peat, natural regeneration, SSSI protection, and invasive species control.</li> <li>• AECS 2024-2029 - Luss Estates Company will carry out its AECS application for 2024-2029.</li> <li>• Support for tenants - Luss Estates Company will also support tenants in their own AECS applications, and other environmental work.</li> </ul>
Trees	
Water	-

**Which of the objectives on Restoring Nature for Healthy Ecosystems can you or your organisation help to deliver?**

Restore Nature at a Landscape Scale	<ul style="list-style-type: none"> <li>• Mixed carbon sequestration / biodiversity growth and hill farming projects – The Estate will promote large-scale nature regeneration schemes in Glen Luss and Tullich Firkin, whilst maintaining a healthy balance with hill farming and tree plantations.</li> <li>• The Estate will continue non-native invasive species control where it is funded on a pound for pound basis - rhododendron, Japanese knotweed etc.</li> <li>• Deer and sheep population control – the Estate will continue tough deer control, on the basis that a funding mechanism can be found, with the aim of promoting native tree regeneration.</li> </ul>
Land Managed Primarily for Nature Restoration	<ul style="list-style-type: none"> <li>• The Estate will not sacrifice the hill farming community without a clear plan to diversify farm holdings and create new permanent rural jobs. We do not accept that new “green” jobs based on landscape scale contracting will fill this void.</li> </ul>
Reduce Grazing Animal Pressures	-
Improved Monitoring of Changes in Nature	-

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

Land Use Change	<ul style="list-style-type: none"> <li>• The plan does refer to local food being consumed locally – a key block to this is local abattoir facilities. If local food is to be sold locally then a means of processing carcasses is needed. This industry is contracting – this should be referred to in the plan.</li> </ul>
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	<ul style="list-style-type: none"> <li>• The plan does not address the need for Scotland to grow its own food supplies, and what role the LLTNPA has to play in supporting Scotland. It is not right to simply export a carbon producing activity outside of the National Park in order to tick a box inside the NP.</li> <li>• We will still need to eat in the future, more emphasis should be given to this</li> <li>• The plan talks of “promoting the integration of land use and development priorities” - our concern is that the LLTNPA interpretation of NPF4 will mean no new development of any sort within the Park, and thus no new activities and jobs to replace those the LLTNPA propose are lost due to a reduction in traditional hill farming.</li> </ul>
New Funding Streams	-
Engaging Communities in Land Use Decisions	<ul style="list-style-type: none"> <li>• The Estate have sought to proactively engage local communities and stakeholders in discussions on land use during preparation of the 2023 Land Use &amp; Development Framework. This will continue as the Estate seeks to implement aspects of its plan.</li> <li>• We will not accept LLTNPA having a formal role in the land management of the Estate but are happy to receive their advice and thought on possible options.</li> </ul>
Green Jobs, Skills, and Business Opportunities	-

### **What role can you play in delivering these objectives or actions?**

Are there any challenges or barriers we need to overcome to help you do this?

The Estate is willing and eager to deliver large scale landscape change on their private landholding, with identified sites, but the economic challenge means that without substantial private and/or public funding the landscape change will need to be delivered with some kind of income generation.

Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?

We are concerned that the plan will marginalise the hill farming community, which is already in a precarious position. Refer to our separate letter

### **How do we measure success?**

Do you have any comments on these proposed measures or any other suggestions?

Nature monitoring is expensive. How will this be funded? The funds to do this do not exist currently, and hill farming is not profitable enough to undertake such work.

How can you help us to measure them?

No specific comment to add.

### **Policies for Restoring Nature**

Do you have any comments on the policies for Restoring Nature?

No specific comment to add.

### **Who needs to be involved in Restoring Nature?**

Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.

### **Creating a Sustainable, Low-Carbon Destination**

#### **Aims and Objectives**

**Which of the objectives on Connecting Everyone with Nature can you or your organisation help to deliver?**

Sustainable Visitor Economy	<ul style="list-style-type: none"><li>The new 'Luss Estates Glens Route' - proposed in support of the OFGEM pylon mitigation project, the project promotes public access to the wilderness, linking with the John Muir Way from Dunbar, the Three Lochs Way to Inveruglas, and the Great Trossachs Forest Route to Loch Katrine. It further supports the diversification of farms at Doune, Tullich, Glen Mollachan, Edentaggart, and Duirland.</li></ul>
Inspiring Action for Nature and Climate	-
Diversity and Inclusion	-

**Which of the objectives on Improving Popular Places and Routes can you or your organisation help to deliver?**

Multi-year Place Programme	<ul style="list-style-type: none"><li>The Estate are willing contributors to the completion of Strategic Tourism Infrastructure Development Studies and offer up the body of research and consultation contained within our Estate Plan as evidence of the issues currently felt by the communities.</li></ul>
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Visitor hubs	<ul style="list-style-type: none"> <li>• The Estate's Land Use &amp; Development Plan will promote a new safe walking and cycling route adjacent to the A83 between Arrochar and Tarbet, connecting to the primary school. This will be created on land owned by Luss Estates Company south of the existing A83 but is dependent on remodelling of the railway bridge.</li> <li>• Railway Bridge Remodelling and Station Relocation - The railway bridge will require remodelling for reasons of safety, age, and condition. Remodelling of the bridge should facilitate safe and increased areas for pedestrian and cycle access passing under, and exploration of the possible relocation/expansion of the existing railway station to a site south of the bridge.</li> <li>• Arrochar &amp; Tarbet Traffic Management Plan - support the community in Arrochar and Tarbet in making the corridor between the villages and the villages themselves safer for pedestrians and cyclists, using the approach taken in Luss as a blueprint, combining the persuasive power of the community, politicians, and landowners.</li> <li>• A82 Realignment - support ongoing discussions around the 'high road' realignment of the A82 over Tarbet proposed by the Friends of Loch Lomond, on the basis it would create a quiet corridor along the loch, improve the environment for residents and visitors alike, and attract inward investment.</li> <li>• Tarbet Corner Realignment - proposed realignment of the A83 corner in Tarbet, using land owned by Luss Estates Company to</li> </ul>
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	<p>form a smoother and safer turn, with increased visibility for vehicles and pedestrians, and to create a new public green space. To be explored as a pilot scheme initially, permitting pre- arranged access for large vehicles.</p> <ul style="list-style-type: none"> <li>• Arrochar Pier - support the reintroduction into use of Arrochar Pier, as a means to promote sea loch cruises, and to reconnect Arrochar to the west. Site not in the ownership of Luss Estates Company and to be developed by others.</li> <li>• Maid of the Loch - support the possible reintroduction of the Maid of the Loch to service. To be developed by others.</li> </ul>
Recreational Path Network	<ul style="list-style-type: none"> <li>• The new 'Luss Estates Glens Route'</li> </ul>

Water Recreation	<ul style="list-style-type: none"> <li>• Aldochlay Traffic Management &amp; Loch Access Scheme - proposed traffic management scheme to maintain public loch access in the event of on-street parking from Luss village to the south entrance becoming illegal from 2023. To possibly include parking, non-motorised loch access, and picnics.</li> </ul>
Partnership Approach to Visitor Management	<ul style="list-style-type: none"> <li>• The Estate will continue to partner Luss &amp; Arden Community Council in Luss Summits.</li> </ul>
Byelaws	<ul style="list-style-type: none"> <li>• Luss Estates Company will support a ban on jetskis in Luss Bay, Loch Lomond, and the National Park.</li> </ul>
Promoting Visitor Safety	-

**Which of the objectives on Low-Carbon Travel for Everyone can you or your organisation help to deliver?**

Whole System Approach	-
Incentivising Sustainable Travel Choices	<ul style="list-style-type: none"> <li>• Through the Luss Village Traffic Management Plan – we will continue to support the implementation of the Traffic Regulation Order approved in 2022 to restrict vehicle access and parking in the village core to residents, disabled, service and emergency vehicles, and continue to promote the exclusion of cars from Luss Village in conjunction with Luss &amp; Arden Community Council. This will have the effect of making public transport a more attractive transport mode for accessing Luss.</li> </ul>
Developing a Rural Transport Sector	-

**What role can you play in delivering these objectives or actions?**

Improvement to the transport services and connectivity in Arrochar and Tarbet have been identified as a community priority. The Estate supports the objective of the National Park and puts forward proposals from its Land Use & Development Plan that align with the objective.

**Are there any challenges or barriers we need to overcome to help you do this?**

Improvements to connectivity in Arrochar & Tarbet will be a challenge to deliver without stimulus, and the re-establishment of Arrochar and Tarbet as a destination. The safe walking route between the villages identified in Luss Estates Company's plan is impossible to deliver without redevelopment first of the railway bridge. It is the belief of the Estate that in principle a new visitor attraction between the villages would act as the stimulus for an accelerated programme of improvements to the local infrastructure and a solution to the vacant and undeveloped land in the area. we believe this development can boost the use of public

modes of transport including rail, sea, and active travel. Otherwise, prioritising the level of public investment required to this infrastructure is more difficult to justify.

With over 4 million visitors coming to the National Park every year (according to the plan, although it would be good to see the evidence for this) visitor management is vital. We know that visitor pressure has caused biodiversity loss, so this is important. Unless the plan includes a guarantee that sufficient public funding is available to manage these visitors then the adverse problems associated with antisocial behaviour and visitor pressure in delicate biodiversity spots will not be solved.

**Can you suggest any other objectives or actions to help us meet our aims for Creating a Sustainable, Low-Carbon Destination?**

No specific comment to add.

**How do we measure success?**

Do you have any comments on these proposed measures or any other suggestions?

No specific comment to add.

How can you help us to measure them?

No specific comment to add.

**Policies for Creating a Sustainable, Low-Carbon Destination**

Do you have any comments on policies for Creating a Sustainable, Low-Carbon Destination?

No specific comment to add.

**Who needs to be involved in Creating a Sustainable, Low-Carbon Destination?**

Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low- Carbon Destination? Feel free to add any you think we are missing from this list.

**Enabling a Greener Economy and Sustainable Living**

**Aims and Objectives**

**Which of the objectives on Enabling a Greener Rural Economy can you or your organisation help to deliver?**

Transition to a Greener Economy	-
Low Carbon Businesses	<ul style="list-style-type: none"><li>Luss Estates Company will take a proactive approach to reducing carbon emissions in the Estate's business practices.</li></ul>
A Wellbeing Economy	-

Inclusion & Learning Opportunities	-
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**Which of the objectives on Living Well Locally can you or your organisation help to deliver?**

Low Carbon Local Living	-
Increasing Resilience to the Changing Climate	-
Addressing Housing Needs	<p>The Estate proposes to make land available for new housing :</p> <ul style="list-style-type: none"> <li>• Residential Site - Tigh na Craig House - the existing house is beyond repair. Existing footprint to be replicated and new house built further from the A82, adjacent to Rowanbank.</li> <li>• Residential Site - Arnburn - proposed site for housing of circa 30 units of mixed tenure, including open market, social, and shared equity.</li> <li>• Residential Site - Tarbet - proposed site opposite Ballyhennan Crescent for housing of mixed tenure, including open market, social, and shared equity.</li> </ul> <p>And also to make new land available through the change of existing permissions at:</p> <ul style="list-style-type: none"> <li>• Residential Site - former commercial site in Luss - planning granted for 6 no. commercial / light industrial units (2015/0255/DET). Proposed change of use for residential social housing to support population growth and to divert visitors from Luss village core, in conjunction with other fringe development options.</li> <li>• Residential Site - former museum proposal in Luss - planning granted for erection of museum (2018/0244/DET)(Renewal of Planning Permission 2015/0256/DET). Proposed change of use to residential house to support population growth and to divert visitors from Luss village core, in conjunction with other fringe development options.</li> </ul> <p>The Estate would also promote the self-build affordable or shared equity model, <u>with the aim of introducing primary residences only.</u></p>

Rural Transport & Active Travel	<ul style="list-style-type: none"> <li>Infrastructure improvements in Arrochar &amp; Tarbet. See earlier section.</li> </ul>
Community influence and placemaking	<ul style="list-style-type: none"> <li>Community Fund - Luss Estates Company will help establish a 'community fund', making it a condition on development of sites, and promoting existing businesses to contribute. The initiative will targeting a significant annual fund for each community, conditioned on the funds being controlled through the community only, and not through the local authority or Scottish Government.</li> </ul>

**Which of the objectives on Harnessing Development and Infrastructure Investment can you or your organisation help to deliver?**

Identifying Development Needs and Opportunities	<ul style="list-style-type: none"> <li>Potential to deliver the Arrochar development site as an integrated development with large scale landscape change.</li> </ul>
Nature-first Approach to Development	-
Delivering Positive Local Outcomes	<ul style="list-style-type: none"> <li>Community Fund – see note above.</li> </ul>
Making the Best Use of Land and Assets	<ul style="list-style-type: none"> <li>The Estate proposes the most effective way to bring vacant sites in Arrochar and Tarbet back into use – and a less adversarial approach than CPO – is to incentivise the owners of these holdings to develop their sites through the introduction of a significant development of the Estates site between Arrochar and Tarbet, this would be a catalyst for inward investment, and action on the numerous vacant sites in the area.</li> </ul>

**What role can you play in delivering these objectives or actions?**

Refer to bullet points above.

Are there any challenges or barriers we need to overcome to help you do this?

There are limited jobs in green infrastructure. These are the only jobs mentioned in the partnership plan. In order to avoid causing rural decline more emphasis is required in the plan to grow rural employment, and more rural diversification and development is required.

Re. housing – small infill plots do not work commercially, especially when a 1:1 ratio of open market to social is applied. Larger sites need to be promoted.

Re. vacant sites – the proposed approach of utilising CPO is costly and adversarial.

Can you suggest any other objectives or actions to help us meet our aims for Enabling a Greener Economy and Sustainable Living?

No specific comment to add.

#### How do we measure success?

**Do you have any comments on these proposed measures or any other suggestions?**

No specific comment to add.

**How can you help us to measure them?**

No specific comment to add.

**Do you have any comments on proposed measures or any other suggestions?**

No specific comment to add.

### **Respondent 42**

#### **Mountaineering Scotland**

Thank you for the opportunity to comment on your draft NPPP. This is an important process to deliver on the four statutory aims of the LL&T National Park.

Mountaineering Scotland has the following observations to make on the content and process of the NPPP.

1. Mountaineering Scotland supports initiatives that enable people to walk, climb and ski in the National Park by public transport and/or active travel, in order to enjoy the Special Qualities of the Park: the look and feel of the wild qualities of the landscape, and the diversity and abundance of wildlife in the hills and glens.
2. We would support objectives that enable initiatives that provide readily available information for visitors on opportunities for outdoor recreation throughout the year, allowing people to make informed decisions on where to go and what to do when they are there.
3. We support your objectives on peatland trees and water, and especially the objective on page 43 that addresses herbivore impacts on the qualities of the land. We welcome the regeneration of native woodlands and scrub where the land can naturally support them, and where this can be done without the use of extensive deer fences.
4. We support the proposal for investment in the National Park's recreational path network, stated on page 75. Although there is a "focus on keeping the existing network and statutory core paths in good condition" we are very interested in your intention for "developing more sustainable models to resource path maintenance". We think this is important to address the environmental challenges of erosion on popular paths to viewpoints and summits, many of which are not Core Paths, but are constantly used by visitors to the Park.
5. Regarding the Objectives by 2030 on page 68, we encourage the Park Authority to add to the initiatives listed and help visitors take a progressive approach to more

active outdoor recreation, to build up fitness and stamina, and knowledge and experience, as well as confidence –enabling those wishing to take more adventurous active outdoor recreation to equip themselves physically and mentally for increasingly wild walking, climbing and snowsports touring, amongst other activities.

6. The objectives on page 82 of the plan can be interpreted as visitor management policies, but the visitor experience of the Special Qualities of the area is the reason why people come to the Park. The objectives here could highlight the opportunity to link the visitor experience of the Special Qualities of the Park to active travel and carbon saving.
7. We are disappointed that work on the draft Outdoor Recreation Delivery Plan has been discontinued, and we would welcome an opportunity to meet with the Park Authority to discuss how outdoor recreation objectives fit within the new draft National Park Partnership Plan. We believe that some form of Delivery Plan is essential to facilitate the exercise of statutory access rights and responsibilities as set out in the Land Reform (Scotland) Act 2003 and the Scottish Outdoor Access Code.
8. We note on page 76 the partnership approach to delivering on the aims and suggest amending the process, to highlight the need for more participants to be round the table to assist with developing initiatives and messaging. We offer the following form of words for consideration:
9. “To ensure a strong approach to coordinating all public bodies, in partnership with key private and third sector organisations, with a role in supporting safe, responsible and sustainable enjoyment of the National Park.”
10. We look forward to the Park Authority maintaining dialogue with ourselves and other outdoor recreation organisations as the draft Partnership Plan progresses, to ensure that the opportunities identified in previous stakeholder workshops for outdoor recreation are captured in the new Plan.

### **Respondent 43**

#### **The Royal Yachting Association Scotland (RYA Scotland)**

The Royal Yachting Association Scotland (RYA Scotland), is the governing body in Scotland for all forms of dinghy and yacht racing, motor and sail cruising, RIBs and sports boats, windsurfing, narrow boats, and personal watercraft. Our purpose is to promote and protect safe, successful and rewarding boating in Scotland. We represent a community of about 90,000 people actively engaged in boating activity in Scotland. RYA Scotland supports the vision of the plan and is keen to help.

There are three RYA affiliated clubs in the park, Loch Lomond Sailing Club, Loch Venachar Sailing Club and Loch Ard Sailing Club, four if you include the Loch Earn Sailing Club which has a clubhouse just outside the park. The Loch Lomond rescue boat service is also affiliated. There are also the following RYA Recognised Training Centres: Ardentinn Outdoor Centre, Benmore Outdoor Centre, Scout Adventure, Lochgoilhead and West Coast First Aid. Some of the clubs are also Recognised Training Centres, all of which are subject to inspection.

RYA Scotland has a Sustainability Action Plan and works with the RYA and British Marine to promote good practice using The Green Blue (<https://thegreenblue.org.uk>). RYA Scotland is developing expertise and experience in delivering sailing events, both competitive and training, in a more sustainable low-carbon format.

We see ourselves in potentially having a role in *creating a sustainable low carbon destination* and, in particular, *connecting everyone with nature* and *improving popular places and routes*, although in the latter case we would argue that it is not necessarily just the popular places that would benefit from improvement.

The role of sailing clubs in connecting people with nature should be recognised and the clubs themselves should be seen as possible delivery partners. We would also suggest that there should be more encouragement of unpowered water-based recreation be that sailing, rowing or paddling. However, we also recognise the importance of training for minimising the risk of accidents as Loch Lomond in particular can provide challenging conditions.

I note, and welcome, the intention to invest in existing pier and pontoon infrastructure on Loch Lomond to enable leisure journeys and growing water transport services. However, piers and pontoons only represent improved facilities for those already on the water and consideration also needs to be given to launching sites, as the Duncan Mills slipway is really the only significant access point now for small trailed boats. A focus on these facilities risks failing to acknowledge the value of the small boat community that is active on and around the lochs of the park and risks becoming exclusive. More points of access will help dissipate the pressure on the existing facilities, extend the opportunities to visit other areas of the park and improve the overall visitor experience, particularly for lightweight craft such as sailboards, kayaks and paddle boards which can act as an entry route to sailing larger boats. We recognise, however, that there does need to be some control over access to prevent the inappropriate launching of motorised craft.

I know that there have been many examples of inappropriate behaviour by some boaters and that effectively enforcing existing laws and park regulations is a key issue. The RYA has a policy of education not legislation and we would support an appropriate programme of behaviour change, while recognising the importance of regulation and penalties for behaviour that endangers other users or the environment. The National Access Forum, of which RYA Scotland is a corresponding member, has produced a number of documents relating to minimising the adverse impacts of recreation including [Guidance on managing public access in areas of wildlife sensitivity in Scotland](#). It should be added to the list of partner organisations.

I will conclude by quoting the remarks of a previous CEO of RYA Scotland in relation to the park:

*“The opportunity to go on the water is a unique aspect of the park's attractions offering a different perspective on the natural beauty of the area, a means of travelling to areas less accessible by car or the simple pleasure of finding a tranquil spot away from the crowd. It is a fact that almost all of those with a responsibility for offering these opportunities will be trained, qualified or inspected at some level by the RYA. Further, the opportunity to learn boating in a recreational context can only be undertaken through an RYA Recognised Training Centre.”*

RYA Scotland would be happy to work with the park authorities on these issues, as it has in the past, especially with regard to promoting responsible boating.

## **Respondent 44**

### **SRUC**

#### ***Which of the objectives and actions outlined in the Draft Plan can you or your organisation help to deliver? What role can you play in delivering these?***

The sub-set of LLTNP Objectives and Actions that SRUC could help the Park deliver are listed overleaf together with an indication of the role that SRUC could play.

Note that there are other Objectives and Actions [e.g. assisting with community engagement, conducting economic assessments] where SRUC also has skills and expertise but where SRUC input would require access to bespoke funding to enable this.

#### ***Are there any challenges or barriers we need to overcome to help you do this?***

As indicated in the final page of the table overleaf, where skills gaps can be filled by programmes or courses which already exist then it is easier for SRUC [or any other education and training provider] to enter into discussions with the Park and others as to how those programmes or courses can best be made available to candidates within the Park.

However, where any such gaps need to be filled by new programmes or courses then SRUC [or any other training provider] needs to be sure that there is a market [in terms of candidates willing to undertake such training and employers recognising the need for improving the skills of existing or new employees] before it can invest time and effort to develop such new programmes or courses.

Hence the Park's intention to establish a robust evidence base to identify where there are existing skills or labour shortages along with opportunities and demand for new green skills and jobs growth, will be fundamental to informing the type and level of new programmes or courses that are required.

***Can you suggest any other objectives or actions to help us meet our aims in each area of the Draft Plan?***

SRUC has no additional suggestions, but see the comment below with regard to the policies question.

***Can you suggest any other delivery partners needed to help deliver these?***

Some NGOs [such as Woodland Trust and Argyll Fisheries Trust] are mentioned in the text but not listed as Delivery Partners. NGOs such as these and others might only be helpful with delivery in certain parks of the Park, but would be helpful nevertheless.

***Do you have any comments on the policies outlined in each area of the Draft Plan?***

It is appreciated that the primary purpose of the Plan is to facilitate and enable change within the Park. However, biodiversity in particular is no respecter of artificial boundaries and what is happening immediately outside the Park can also have an influence within the Park.

For example, SRUC is aware of large-scale native woodland restoration project proposals on estates neighbouring our Kirkton & Auchtertyre Farms in the north of the Park. What is happening on those sites outwith the Park has the potential to have both positive [in terms of increasing native woodland connectivity] and negative [in terms of changing movements of deer] within the Park.

This type of situation will no doubt be mirrored – for the same or different land use changes – elsewhere just outside the Park. It may, therefore, be worthwhile considering whether an additional policy is needed which emphasises the need to be aware of large scale land use changes occurring just outside the Park and whether these may complement or compete with objectives and actions within the Park or mean that aspects of the latter may need to be changed.

***Do you have any comments on the measures of success proposed? How can you help us to measure them?***

Indicators can be described as being focused on Input [usually funding focused e.g. Track the amount of land in the National Park under new climate and nature-related agreements and funding], Output [activity focussed e.g. Measure the annual number of people visiting the National Park] or Outcome [e.g. Track the extent and condition of the National Park's peatland].

While some Input and Output indicators can be helpful to know if a sufficient focus is being put on the things that need to happen to potentially achieve an outcome, as far as climate and biodiversity are concerned they do little to indicate that a positive outcome has actually been achieved.

Ideally, the most useful indicators to measure success are Outcome focused but many of the metrics described in the Plan are either Input or Output. It is appreciated that Outcome metrics

can be difficult to collect, but for the biodiversity measures of success at least it would be useful to consider whether some of the metrics proposed in the Delivery Plans for the Scottish Biodiversity Strategy might be useful to also focus on within the Park [the Delivery Plans will be published for consultation later this summer].

Finally, some of the measures of success included in the Plan are indeed measurements but they provide little or no information on what would be regarded as success. Take for example, that for Green Jobs on p116 of the Plan: *“Track the creation of new or expanded numbers of jobs and business development opportunities, including social enterprise, in sectors that are crucial to the just transition of the National Park’s economy. For example, sustainable travel, woodland creation, peatland restoration and ecotourism”*.

While what would be regarded as a direction of travel towards success is clear [e.g. increasing the number of jobs in peatland restoration] there is no indication given as to what level of increase would be regarded by the Park as being a success? Which calls into question whether it can actually be classed as a measure of success.

SRUC can certainly help measure some of these metrics specifically on the land that it manages at Kirkton & Auchtertyre Farms, but is not in a position to help the Park measure the majority across the full extent of the Park.

Only those LLTNP Objectives and Actions of relevance to SRUC are listed here

<b>Restoring Nature: For Climate</b>		
<b>LLTNP Objective</b>	<b>LLTNP Actions of Relevance to SRUC</b>	<b>SRUC Relevance</b>
<p><b>Peatland</b> To significantly reduce the area of degraded, high emission peatland and convert this into regenerating carbon capture condition instead.</p>	<p>Scaling up of the Peatland ACTION programme, with support from private finance and carbon markets, to repair more degraded peatland areas, reducing emissions and switching them into carbon capture mode.</p> <p>Reduction in damage to fragile peatland surfaces from wild deer and livestock trampling through better informed management.</p>	<p>SRUC has collaborated with LLTNP and Peatland Action in restoring degraded peatlands on SRUC’s Kirkton &amp; Auchtertyre research &amp; demonstration farms within the Park, and will continue to work with the Park and others to help advocate for more peatland restoration elsewhere in the Park.</p> <p>Although not bespoke to the Park, SAC Consulting [through its local advisory offices, in-house expertise in peatland survey and current delivery of the Farm Advisory Service] will also seek to encourage more land managers to engage with Peatland Action.</p> <p>SRUC’s Wildlife &amp; Conservation Management programme teams across Scotland will continue to highlight the need for - and importance of - peatland restoration through their inputs to a range</p>

		<p>of Further Education, Higher Education and – increasingly - Work Based Learning programmes. In addition, the team within SRUC’s South &amp; West Faculty will continue to work with NatureScot to deliver a new Design of Peatland Restoration training course and to liaise with NatureScot and others – including the Park - over other skills gaps that could potentially be filled by new short course development.</p> <p>Highlighting the need to address ongoing and future herbivore damage to restored peatland areas will remain an important component of all SRUC’s advocacy and education and training activities.</p>
<p><b>Trees</b> To increase the number, species diversity and health of trees across suitable areas of the National Park.</p>	<p>Encourage and support more projects and proposals that deliver healthy and diverse tree and shrub habitats in suitable landscapes in the National Park. Including productive forests, native woodlands, hedgerows and scrub, this will be delivered through better informed management of grazing animals and invasive Rhododendron at a strategic, landscape scale</p>	<p>Although not bespoke to the Park, SAC Consulting [through its local advisory offices, in-house expertise in woodland establishment and current delivery of the Farm Advisory Service] will also seek to encourage more land managers to engage in new woodland creation in particular.</p> <p>SRUC’s Forestry &amp; Arboriculture team will continue to highlight the need for - and importance of – a range of new woodland creation through their inputs to</p>

	<p>allowing successful natural regeneration as well as planting schemes.</p>	<p>a range of Further Education, Higher Education and Work Based Learning programmes.</p> <p>SRUC’s Hill &amp; Mountain Research Centre, at Kirkton &amp; Auchtertyre Farms within the Park, will continue to highlight to a range and land managers how more trees and</p>
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		woodlands have already been integrated successfully into the farms and will seek to integrate more over the coming years.
<p><b>Water</b></p> <p>To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate change and benature-rich environments.</p>	Engage with public and stakeholder organisations, and land managers to trial and pilot restoration projects on water bodies through channel re-alignment, removal of legacy engineering structures, woody dam installation, pond creation and water margin woodland creation.	SRUC's Hill & Mountain Research Centre, at Kirkton & Auchtertyre Farms within the Park, is already in discussions with the Park, Loch Lomond & The Trossachs Countryside Trust, Tay District Salmon Fisheries Board and neighbours with regard to the potential to lower/remove part of an embankment on the farms to improve water quality for invertebrates and fish in the River Fillan [as part of the Wild Strathfillan Initiative].
<b>Restoring Nature: Healthy Ecosystems</b>		
<b>LLTNP Objective</b>	<b>LLTNP Actions of Relevance to SRUC</b>	<b>SRUC Relevance</b>
<p><b>Restore Nature at a Landscape Scale</b></p> <p>Expand and improve priority habitats and enhance connectivity between habitats and eco-systems across the National Park to create functioning nature networks.</p>	Develop and deliver large-scale nature restoration projects and programmes and improve connectivity to create nature networks for the National Park. Priority areas include Wild Strathfillan, The Great Trossachs Forest and Loch Lomond Basin.	SRUC's Hill & Mountain Research Centre, at Kirkton & Auchtertyre Farms within the Park, is already supportive of - and in discussions with - the Park, Loch Lomond & The Trossachs Countryside Trust, and others with regard to SRUC input to the Wild Strathfillan Initiative.

<p><b>Reduce Grazing Animal Pressures</b> Reduce grazing, browsing and trampling pressures in order</p>	<p>By developing a Herbivore Strategy and through proactive management measures; drive forward a significant reduction in unwanted impacts from grazing animals across the National Park that lead</p>	<p>Although SRUC is unable to directly influence herbivore management across the Park as a whole, SRUC's Hill &amp; Mountain Research Centre, at Kirkton &amp; Auchtertyre Farms within the Park, will continue to be an active member of the Breadalbane Deer Management Group.</p>
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<p>to promote recovery of key habitats and sites.</p>	<p>to active recovery of trees, peatlands and wetland habitats.</p>	
<p><b>Improved Monitoring of Changes in Nature</b> Develop improved monitoring and reporting to measure progress in nature restoration.</p>	<p>Create a State of Nature monitoring and reporting system for the National Park that provides accurate data and knowledge on the condition of nature, and where action needs to be strategically focused.</p>	<p>SRUC will continue to work with the Park and other partners to help deliver the Park's Future Nature Vision, a key part of which is to build a robust and ongoing reporting structure to monitor and analyse progress of Nature Restoration in the National Park.</p>

<p><b>Restoring Nature: Shaping a New Land Economy</b></p>		
<p><b>LLTNP Objective</b></p>	<p><b>LLTNP Actions of Relevance to SRUC</b></p>	<p><b>SRUC Relevance</b></p>
<p><b>Land Use Change</b> To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs.</p>	<p>Encourage and support land managers to shift more suitable land towards low carbon and regenerative agriculture as a primary purpose.</p>	<p>Although not bespoke to the Park, SRUC will continue to work in an advisory capacity with Scottish Government, its agencies and others to [a] develop a new framework for future agricultural support in Scotland which encourages more of a move towards low carbon and regenerative agriculture and [b] ensure – where relevant - that the new Delivery Plans being prepared under Scotland's Biodiversity Strategy 2022-2045 complement and enhance that new support structure.</p>

		Similarly, although not bespoke to the Park, once these support structures and delivery plans are clearer, SAC Consulting [through its local advisory offices and current delivery of the Farm Advisory Service] will also seek to encourage more land managers to shift more suitable land towards low carbon and regenerative agriculture as a primary purpose.
<p><b>New Funding Streams</b></p> <p>To develop funding support opportunities that help deliver wider public benefits from our land, including for climate and nature.</p>	Engage in national level land reform policy discussions to advocate for a shift in land use policy support and regulation schemes. Aim to deliver a change in the way that land and water is managed, towards a new, integrated system that does not continue to deplete nature and instead restores it as well as support production and jobs.	<p>The two points made with regard to the <b>Land Use Change objective</b> above are also directly relevant here.</p> <p>In addition, although not bespoke to the Park, SRUC's Thriving Natural Capital Challenge Centre in particular will continue to work with a wide range of government, agency, NGO and private company partners to support, advise and encourage responsible private investment in natural capital through carbon markets, ecosystem markets and green finance mechanisms.</p>

	Encourage, develop and pilot new funding streams and projects, such as private ethical green finance and new investment markets (e.g. carbon credits and biodiversity credits) that bring new, multi-year funding to allow delivery of land- use based climate and nature restoration benefits across the Park.	
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<p><b>Green Jobs, Skills and Business Opportunities</b></p> <p>To support change in the land management sector to better meet and benefit from the opportunities from changing land use priorities.</p>	<p>Develop and deliver training and further education opportunities that meet the anticipated demand from scaling up climate and nature restoration projects as well as and regenerative agriculture and sustainable forestry. Help local communities and land managers to turn these into employment and volunteering opportunities through training and re-training.</p>	<p>SRUC is a tertiary education institute with a vision is to become an enterprise university at the heart of the natural economy. SRUC already has a range of Further Education, Higher Education and Work-Based Learning programmes focused directly on wildlife &amp; conservation management and forestry, and our agriculture programmes are currently in the process of being revised and revalidated.</p> <p>SRUC has also collaborated recently with NatureScot and Peatland Action to develop and deliver a new short-course [on the design of peatland restoration plans] to help fill an identified skills gap and is keen to work with the Park and other partners to understand where other such gaps may lie of relevance to the Park's objectives and how they might be filled.</p> <p>SRUC's Hill &amp; Mountain Research Centre, at Kirkton &amp; Auchtertyre Farms, lies within the Park and SRUC is already in discussions [as part of the Wild Strathfillan initiative] with Loch Lomond &amp; Trossachs Countryside Trust to identify what types of training it may be feasible to deliver from that location.</p>
<p><b>Enabling a Green Economy &amp; Sustainable Living: Transition to a Greener Economy</b></p>		
<p><b>LLTNP Objective</b></p>	<p><b>LLTNP Actions of Relevance to SRUC</b></p>	<p><b>SRUC Relevance</b></p>
<p><b>Transition to a greener economy</b></p> <p>The National Park economy is transitioning to a greener, zero-carbon wellbeing economy in ways that are fair</p>	<p>Establish a robust evidence base to identify where there are existing skills or labour shortages along with opportunities and demand for new green skills and jobs growth.</p> <p>Develop a Green Skills and Just Transition Action Plan</p>	<p>The response above and below to the Park's <b>Green Jobs, Skills and Business Opportunities</b> and <b>Inclusion and learning opportunities</b> objectives are also of relevance here.</p> <p>Note that the Park's ability to identify existing skills or labour shortages will be fundamental as this underpinning evidence is essential before SRUC [or any</p>

and inclusive to everyone and	for the National Park to ensure the benefits arising	other education and training provider] can invest time and effort to developing
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where the benefits arising from this are retained and shared locally.	from economic transition are shared in a fair and inclusive way.	programmes or courses to fill those gaps and ensure that these are of the type and level that is required.  Once those gaps are identified, SRUC would be keen to work with the Park and others in the development of the Green Skills and Just Transition Action Plan.
<b>Inclusion and learning opportunities</b> More people within our communities are contributing to supporting a greener rural economy through increased learning, skills and volunteering opportunities.	Support young people to see their future in the National Park through development of traineeships, apprenticeships and placements that provide wide- scoping opportunities for green skills development and pathways into green jobs and careers.	The responses above to the Park's <b>Green Jobs, Skills and Business Opportunities and Transition to a greener economy</b> objectives are also of relevance here.  Once existing or new education and training needs have been identified that would underpin such traineeships, apprenticeships and placements, then SRUC and SAC Consulting would be happy to work with the Park and others [such as National Farmers Union for Scotland and Scottish Land & Estates] to encourage land managers to offer young people the opportunity to undertake such training.

## **Respondent 45**

### **Scottish Land and Estates**

#### **Summary Response and Full Response**

Land managers in the National Park are committed to ensuring the natural and cultural heritage on the land they manage is protected, conserved, and enhanced. It is hugely

important that they are supported to do so by policies and regulations that are stable and consistent, well-designed, well-funded and well-implemented, and also well-governed, with a clear link between action and result. Decisions should always be evidence-led with appropriate consultation and wide-spread community support, and the focus should be on planning policies which are enabling and empowering (rather than prescriptive) to support the achievement of outcomes, specifically the Just Transition to Net Zero.

While the focus of the National Park is rightly on nature and landscape, there should also be a recognition that productive agriculture and forestry has a place and is indeed essential to the sustainability of those working and living within the park.

### Nature Restoration

SLE strongly supports an integrated approach to land and water management, as detailed in our Route 2050 report, and we support the principle of partnership working as a delivery mechanism of landscape-scale change. Key points from our response to this section include:

- SLE supports a clear and long-term plan for the future of rural Scotland that includes public and private investment - with stable and consistent incentive arrangements – to ensure financial viability and incentivise and reward responsible land management.
- Many of our members are reporting a shortage in the skills they need to run a successful rural business and offer opportunities to people in rural areas. We would like to see LLTNP work with landowners and educational bodies in the area to identify ways to address this.
- We support the objective to create a State of Nature monitoring and reporting system which provides accurate and knowledge on the condition of nature in the National Park.
- Agro-forestry has a key role to play in delivering integrated land use. It's vital that Scotland's productive capacity is maintained through productive, regenerative agriculture, and businesses become more resilient, market-led and profitable, and the sector more attractive to new entrants.
- Ruminant agriculture can also deliver benefits in terms of biodiversity and grassland management and should not be seen as counter to nature restoration, rather they are part of the solution when managed in the right way.
- Research confirms the growth opportunity for sustainable forestry is significant, so striking a balance between productive forestry and native woodland regeneration is critical to success.
- SLE members play a huge role in helping the government achieve its ambitious tree planting targets. We welcome aims to increase the quantity and quality of tree cover through planting, promoting natural regeneration, and where necessary active management of invasive non-native species.
- Species removal or reintroductions must come with clear policies on how decisions are made, how balanced and fair consultations are carried out and what measures are in place to mitigate any negative associated impacts, prior to further reintroductions/removals.

- Where beavers return to suitable parts of the landscape benefits can be seen. However, when beavers are found in unsuitable locations a suitable mitigation plan must be available to land and fisheries managers who suffer damage to their businesses and must not be left to bear the cost.
- We recognise herbivore management is key to restoring biodiversity, but decisions must be evidence-based with a focus on grazing impacts, animal welfare, employment and skills retention.
- Impacts of visitors to the park should also be recognised, while there are many benefits to this there are also negative consequences which should be understood and where possible mitigated.
- We support efforts to reduce areas of degraded peat within the park. However, land managers have reported delays in delivering restoration projects due to contractor availability and approvals.

We recognise the important role nature restoration and nature networks can play in delivering carbon sequestration. Our members are taking an increasingly pro-active approach to restoring degraded ecosystems – whether that be tree-planting, restoring natural processes or species translocations – and we would like to see the park authority do more to encourage this landscape-scale ecosystems-based approach.

#### Place – Sustainable Destination

Visit Scotland's research confirms that tourism and hospitality sectors are increasingly sensitive to consumer trends and economic conditions. National Parks in Scotland have the scale and opportunity to be at the forefront of the creation and further development of existing and new nature-based tourism streams:

- VisitScotland have developed a range of toolkits that can be adapted to maximise tourism business opportunities and by collaborating locally, key messages can be further developed across LLTNP.
- Research has shown the benefit of outdoor education across all ages, and the Future Nature project could be developed to deliver an enhanced offer of resources and programmes for outdoor learning.
- The Walk in the Park programme should certainly continue as part of the LLTNP strategy. The value of walking extends beyond the well-known health benefits. It can also encourage volunteering.
- The Youth Committee encourages a sense of stewardship and should be further developed.
- Enhanced engagement should be encouraged with underrepresented groups and schools from inner city locations, with sponsorship sought from businesses who are working in the park.
- We would like to see outreach programmes and the work of the Ranger Service given more support.

- The Visitor Management groups initiated during the pandemic have demonstrated their worth, with monthly feedback being sent directly to Government. Additional funding has been made available to support hotspot areas, and the value of continuing this process must not be overlooked.
- The rollout of EV charging points is not keeping pace with the registration of new EV vehicles, and their provision within LLTNP needs to be carefully considered, with hubs at entry points prioritised.
- Similarly, the connectivity between rail, bus, cycle and water transport services is a key priority.
- Rural areas suffer from a degradation of transport infrastructure, particularly public transport options. It is important that local residents are supported both at peak times and a year-round basis.
- We support an erosion reduction model and path maintenance programme for core path network.
- The creation of VMPs must include input from land managers to be deliverable and successful.
- We propose to severely restrict the use of open fires, fire bowls and disposable barbecues.

#### People – Greener Economy

Data collection, establishing an evidence base, is very important for the transition to a greener economy. Engagement with land managers – supporting them in identifying goals and outcomes – is key to success:

- We support the idea of a Green Skills and Just Transition Action Plan to ensure benefits are shared.
- Community learning programmes should cover how Government policy priorities shape land use decision making, manage expectations about what land use decisions communities can realistically expect to influence, and what local landowners are capable of doing in relation to climate resilience.
- We should be incentivising businesses to expand into new technologies. There's a severe scarcity of renewable energy specialists in LLTNP, and existing businesses struggle to recruit new employees.
- Landowners make a significant contribution to our Wellbeing Economy. Many members are keen to increase contributions by offering work opportunities, but report skills shortages that prevent this from happening. We would like to see support extended to small and medium enterprises.
- SLE supports housing policy that ensures thriving and sustainable communities. LLTNP must ensure new housing is built to suit changing demographics (more single and older households), in locations supported by transport infrastructure and services, so the workforce can live where they work.

- BNG should be pursued, but not exclusively at the expense of much needed rural development, that could bolster local economies and deliver infrastructure to businesses and communities.
- There is a concern that not all communities may have the desire or capacity to own, manage or take on vacant or derelict land – CPOs must only be pursued where constituted community bodies have the expertise to prepare and execute a long-term sustainable plan to make the site viable.
- A culture of positive relationship and trust building must be fostered within communities so they can approach landowners with a shared understanding of the practicalities of changing land use.

This approach will help foster stronger working relationships between authorities and landowners and communities, as well as contributing to the sustainable development of LLTNP and helping it to reach its full potential. Our members are well placed to deliver on tackling the climate emergency and nature restoration and most if not all are already undertaking a variety of land management activities to support this. As NatureScot has said, landscape-scale is needed for nature restoration to be effective so the Park must acknowledge the need to work at scale and balance this with its commitment to empowering community use/ownership of land and assets.

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The Loch Lomond and Trossachs National Park Authority's National Park Partnership Plan is of great importance to Scottish Land and Estates' members who reside and work within the Park's boundary. The objectives and actions set out within the Plan will influence land management practice and policy for years to come, in the Park and throughout Scotland.

On the whole, Scottish Land and Estates feels the proposed plan is a progressive document, with many objectives ensuring that the economy of the Park continues to grow, whilst retaining its status as a key visitor destination within Scotland. We also believe that some of the policies will help nature continue to thrive in the Park, with land managers at the heart of wildlife and habitat conservation and restoration.

We recognise the important role nature restoration and nature networks can play in tackling climate change and biodiversity loss, as well as delivering carbon sequestration: indeed, SLE members are taking an increasingly pro-active approach to restoring degraded ecosystems – whether that be tree-planting, peatland restoration or restoring natural processes – and we would like to see the Park Authority do more to encourage this landscape-scale ecosystems-based approach.

While the focus of the National Park is rightly on nature and landscape, there should also be a recognition that productive agriculture and forestry has a place and is indeed essential to those working and living within the park. Improved, sustainable housing and transport services are equally important and we encourage the National Park Authority to work with landowners to seek local solutions. Finding the balance, and integrating management practices that meet all of these outcomes, is vital to future success.

Land managers in the National Park are committed to ensuring the natural and cultural heritage on the land they manage is protected, conserved, and enhanced. It is hugely important that they are supported to do so by policies and regulations that are stable and consistent, well-designed, well-funded and well- implemented, and also well-governed, with a clear link between action and result. Decisions should always be evidence-led with appropriate consultation and wide-spread community support, and the focus should be on planning policies which are enabling and empowering (rather than prescriptive) to support the achievement of outcomes, specifically the Just Transition to Net Zero.

This approach will help foster stronger working relationships between authorities and landowners and communities, as well as contributing to the sustainable development of LLTNP and helping it to reach its full potential. Our members are well placed to deliver on tackling the climate emergency and nature restoration and most if not all are already undertaking a variety of land management activities to support this. They are the experts on land management in the area.

As NatureScot clearly and regularly state, landscape-scale is needed for nature restoration to be effective, so the Park must acknowledge the need to work at scale and balance this with its commitment to empowering community use/ownership of land and assets. Working with existing groups and clusters, such as deer management groups, is a shortcut to many of these benefits and SLE is a willing and able partner to help facilitate these conversations.

Our members are key delivery partners across the majority of actions and objectives contained in the Plan and support the shared vision of a Park which delivers for nature, people and place. Our detailed response below highlights areas of both agreement, and concern (for example, where key objectives, targets or indicators of the Partnership Plan may adversely affect the ability of land managers to deliver positive outcomes); and, where appropriate, suggests alternative approaches to achieving desired outcomes. Positive engagement with land managers is key to success.

A1: Peatland - To significantly reduce the area of degraded, high emission peatland and convert this into regenerating carbon capture condition instead. Scaling up of the Peatland ACTION programme, with support from private finance and carbon markets, to repair more degraded peatland areas, reducing emissions and switching them into carbon capture mode.

We fully support the intention to significantly reduce areas of degraded peat within the park. Land managers already actively engage with the Peatland ACTION programme and are accessing private finance and carbon markets, support for this from the park authority is most welcome.

It must be noted that there are limitations on the ability to deliver this ambition as a result of contractor availability and getting approval to restore smaller patches of peat. Land managers are already reporting delays in delivering restoration projects due to contractor availability and delays in approvals.

There are also reported issues of smaller restoration projects not being approved in favour of larger ones. The prioritisation of large projects first is sensible, but more could be done to join up smaller projects on multiple holding into a larger body of work. The park authority could have a role in encouraging landscape scale, multi-partner, restoration projects.

We are also aware of areas of peat that are deemed to be 'not degraded enough' for the Peatland ACTION programme, but which are still in need of restoration work and would deliver biodiversity and climate benefits. These areas of peatland would benefit from private finance in lieu of other funding options,

A2: Peatland - To significantly reduce the area of degraded, high emission peatland and convert this into regenerating carbon capture condition instead. Reduction in damage to fragile peatland surfaces from wild deer and livestock trampling through better informed management.

The sustainable management of herbivores (including wild deer and livestock) on peatland is important. We support the use of knowledge exchange and engagement with land managers to encourage informed management (for example via established Deer Management Working Groups, many of which demonstrate best practice in this area). Herbivore management decisions must be based on evidence and it should be grazing impacts to peat, rather than numbers, which are used in encouraging management objectives that meet the park authority's objectives.

Evidence should also be assessed, on the benefits that grazing animals can bring to wildlife and biodiversity, and this should be considered in any future management planning; as well as the obvious economic issues with reducing grazing numbers.

A3: Trees - To increase the number, species diversity and health of trees across suitable areas of the National Park. Encourage and support more projects and proposals that deliver healthy and diverse tree and shrub habitats in suitable landscapes in the National Park. Including productive forests, native woodlands, hedgerows and scrub, this will be delivered through better informed management of grazing **animals and invasive Rhododendron at a strategic, landscape scale allowing successful natural regeneration as well as planting schemes.**

Forestry of all forms has a crucial role to play in delivering benefits for the environment, society and economy. There is a danger that we focus solely on planting to address the climate change crisis and lose sight of the other multiple benefits trees, woodlands and forests deliver.

In pursuit of net-zero it would be easy to assume that planting as many trees as quickly possible is the solution but that is not the case. We must make sure to balance enhancing biodiversity with the goal of achieving net-zero.

Fast growing commercial timber with its rapid sequestration will be appropriate in many parts of Scotland, in the same way that other parts of Scotland will be more appropriate for riparian planting, montane planting, rainforest restoration and native broadleaves. It is also important

to ensure current and future forested areas are supported to become more resilient and adapted to future climactic conditions, through research and management.

There is already a series of requirements linked to grant support related to species diversity. We support the use of improved advice for land managers on the sort of activity that would improve the resilience of their trees to climate change, pests and disease, which would be in the best interest of the park.

A4: Water - To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate change and be nature-rich environments. Engage with public and stakeholder organisations, and land managers to trial and pilot restoration projects on water bodies through channel re-alignment, removal of legacy engineering structures, woody dam installation, pond creation and water margin woodland creation.

A target for specifically planting on tributaries vulnerable to temperature change should be adopted as a fundamental addition to the current categories used in FGS scoring criteria.

At present, riverbank woodland creation is not favoured by FGS, the system lacks the flexibility. Under the current scheme riverbank woodland creation score low on “value for money” because they are necessarily linear in nature and require a relatively high capital input in relation to the area planted.

The benefits of reduced flooding downstream and improved biodiversity for nature should be valued higher than they currently are.

A5: Water - To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate change and be nature-rich environments. Targeted action on wetland Designated Sites in unfavourable condition.

No major comment on this, other than that we support the objective to make bodies of water in the park resilient to climate change.

A6: Water - To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate change and be nature-rich environments. Review of abstraction, impoundment and discharge permits to promote nature recovery.

No major comment on this, our members will potentially be extracting water for business use but this is not something we work on too often.

A7: Water - To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate

change and be nature-rich environments. Support the return of the beaver to the Park's freshwater bodies.

Freshwater and marine bodies within the park will need to be resilient to climate change, so it is right that this is a key objective of the plan.

Water is also crucial for the delivery of a nature-rich environment. We note that there can be conservation benefits to the reintroduction of beavers, including the creation of wetlands, improved habitat structure and diversity as well enhanced biodiversity.

Where beavers return to suitable parts of the landscape a wealth of benefits can be seen. However, when beavers are found in unsuitable locations a suitable mitigation plan must be available to farmers, land and fisheries managers who suffer damage to their businesses.

These businesses should not be left to bear the cost of resolving the tension between conservation and land management.

**A8: Water - To increase the quality, naturalness, and health of freshwater and marine bodies in the National Park, allowing them to provide greater resilience to the impacts of climate change and be nature-rich environments. Engage with strategic, regional initiatives that aim to tackle marine litter and pollution for the Clyde area.**

We strongly support measures and efforts to tackle litter and pollution on both land and water. SLE members are already actively engaged in regular local litter picks within the park which will reduce the volume of litter ending up in the marine environment.

We want to see further support for farmers and other landowners to help cover the costs of cleaning up the mess, which can include hazardous waste. Community action within the park is already quite high, additional support for that is always welcomed. This waste is highly likely to result in groundwater pollution and in heavy-rainfall events could become marine litter too.

It is important that tourists are able to easily dispose of their waste and that those found to be littering are held to account.

**A9/10: Restore Nature at a Landscape Scale - Expand and improve priority habitats and enhance connectivity between habitats and eco-systems across the National Park to create functioning nature networks. Expand, connect and strengthen at a large-scale, the major habitat networks of trees, peatlands and wetlands. See map on page 58**

Landowners within the park play an important role in delivering for the environment and are uniquely placed to deliver positive environmental benefits, including protecting and improving the natural capital for which they are responsible.

Many SLE members are already leading the way and taking a proactive approach to restoring degraded ecosystems (tree planting, restoring natural processes and species translocations).

While we are fully supportive of the ambition to increase ecosystem restoration, it is important that a balanced approach is taken, and social and economic factors are considered alongside environmental objectives, in order that the future of the LLTNP is sustainable socio-economically as well as environmentally – otherwise environmental gains will be at risk.

It is imperative that restoration is undertaken in parallel with sustainable economic development and can coexist in harmony with other sustainable land management practices.

It is also important to recognise that every area is different, outcomes can be unpredictable and unique to each site and different approaches will be appropriate in different places. The historic knowledge land managers have of their land and how the landscape is utilised should be treasured and local know-how combined with local policies to deliver action on the ground. Many deer management groups already work together to manage at a landscape scale for mutually beneficial outcomes, bringing together decades of experience of land management.

A11: Restore Nature at a Landscape Scale - Expand and improve priority habitats and enhance connectivity between habitats and eco-systems across the National Park to create functioning nature networks. Develop and deliver large-scale nature restoration projects and programmes and improve connectivity to create nature networks for the National Park. Priority areas include Wild Strathfillan, The Great Trossachs Forest and Loch Lomond Basin.

SLE broadly supports this objective, again recognising the important role that large-scale nature restoration projects – considered on a site-by-site basis – can play in delivering a nature-rich future.

The proposed landscape-scale rainforest restoration project in the Loch Lomond Basin is a good example of what could be achieved through more integrated partnership working and connectivity across the park, and other examples involving SLE members highlight the benefits of this approach.

A12: Restore Nature at a Landscape Scale - Expand and improve priority habitats and enhance connectivity between habitats and eco-systems across the National Park to create functioning nature networks. Tackle Invasive Non-Native Species at a strategic, large-scale, with the aim of reducing them to a point that they no longer create a threat to native ecosystems.

Land managers are committed to ensuring the natural and cultural heritage on the land they manage is protected, conserved, and enhanced.

Most land managers are already actively engaged in and support the various conservation projects which exist within the Loch Lomond and Trossachs National Park, both through the labours of the hundreds of their employees who look after the LLTNP on a day-to-day basis and also with regards to more focused individual conservation projects.

It is important that new projects that either look to reinforce existing species and/or reintroduce lost species are considered in a balanced way and local views are fully considered with land managers, public bodies and communities working together to address the biodiversity crisis.

Decisions should always be evidence-led with appropriate consultation and wide-spread community support.

A13: Restore Nature at a Landscape Scale - Expand and improve priority habitats and enhance connectivity between habitats and eco-systems across the National Park to create functioning nature networks. Increase the use of effective and focused legislative actions on compliance, and if necessary, enforcement to prevent deliberate mismanagement or neglect that leads to an erosion of nature.

Land managers continue to make significant contributions to tackling climate change and biodiversity loss, but it's hugely important that they are supported to do so by policies and regulations that are stable and consistent, well-designed, well-funded and well-implemented, and also well-governed, with a clear link between action and result.

Previous well-intentioned initiatives have left a mixed legacy with barriers ranging from perceptual and motivational (possibly resulting from historic experience) to practical, administrative, and bureaucratic. With funding focussed on peatland and woodland restoration and woodland expansion, there is now an opportunity to reflect and to identify lessons for the future.

Contractor capacity, skills and funding are key factors, with the partnership element being vital to their success. We need to see significant investment being made in ensuring we have the available skills to deliver on the above. For example, our members have a positive willingness to pursue peatland restoration but there are some frustrations at the difficulties of delivery.

A14: Land Managed Primarily for Nature Restoration - Increase the amount of land in the National Park managed primarily to restore nature. Develop a collaborative approach to nature restoration as a prime purpose on land owned or managed by public bodies, environmental charitable bodies, willing private land managers and for all Designated Sites. Create a Nature Restoration Land Forum that coordinates and supports this approach across the National Park and contributes to the implementation of Scotland's 30x30 commitment.

We cannot stress enough the importance of taking an integrated approach to land use policy, rather than looking at activities such as forestry, food production, carbon sequestration and natural capital in silos. The principle of Land Sharing is crucial to the overall success of land management in Scotland.

We're supportive of a move towards outcome-based approaches, and engagement is going to be key to success, supporting land managers in identifying conservation goals and the reasons behind any prescribed activity for a site. Clearer result measures that indicate how a land manager knows when the target outcome(s) has been achieved for a site will encourage greater stewardship and help ensure effective delivery of this objective.

Engagement is going to be key in terms of success. It will be important that the National Park Authority continues to engage with land managers and supports them in identifying conservation goals and the reasons behind any prescribed activity for a site. Being able to identify simple result measures that indicate how a land manager knows when the target outcome(s) has been achieved for a site will encourage greater stewardship and help ensure effective delivery of this objective.

Lastly a collaborative approach involving land managers, local communities and wider stakeholders is needed which highlights the importance of designated sites. Currently very few communities and those visiting the National Park know where designated sites are or why they are important. For areas which receive high visitor footfall/pressure this is an important consideration especially for those sites which have features that are vulnerable to high levels of visitor disturbance. This presents an opportunity to both enhance the visitor experience and assist in conservation of designated features.

A15: Land Managed Primarily for Nature Restoration - Increase the amount of land in the National Park managed primarily to restore nature. Develop and deliver opportunities for nature restoration projects on other important habitats and species, such as upland heaths, flood meadows or parklands.

There is a need for funding mechanisms to better reflect Scotland's priorities for environmental improvement and restoration – e.g. right trees in the right places, next to rivers with improved coordination and targeting with incentives.

NatureScot has an ambition to transform its approach to Protected Areas, so they become catalysts for wider landscape scale restoration and public engagement. Wildlife Estates Scotland (WES) clearly demonstrates how a National Ecological Network can work on the ground, with Pentland Hills WES cluster a good example; it recognises the greater impact contiguous land areas managed to similar principles and values can have.

With regards specific species, there is no specific mention of sea eagles in the report, and due to developments in Argyll and the West Coast with lamb predation, this needs to be monitored over the next five years and liaison maintained with other parts of the country. The same might apply to feral pigs which are quietly spreading, like beavers, and LLTNP should have some strategy within their Park Plan to address the damage that these new species can cause. There also needs to be a clear plan to control species which are illegally released, as this continues to be a source of tension and stress for land managers who are left to deal with the negative consequences of this.

It is likely that this aspiration will need to be developed in line with future rural support schemes and with private finance initiatives. Care must also be taken to ensure that good quality jobs are also available to those already living in the park.

A16: Reduce Grazing Animal Pressures - Reduce grazing, browsing and trampling pressures in order to promote recovery of key habitats and sites. By developing a Herbivore Strategy and through proactive **management measures; drive forward a significant reduction in unwanted impacts from grazing animals across the National Park that lead to active recovery of trees, peatlands and wetland habitats.**

Herbivore management decision making must be based on evidence and it should be grazing impacts rather than numbers which are used in setting and meeting management objectives. Wild deer are a valued asset and an iconic species to Scotland increasingly managed on a sustainable basis to produce a wide range of economic, social and environmental benefits both locally and in the wider public interest – and the contribution they can make to biodiversity and tourism could be more widely acknowledged.

Evidence should also be assessed on the benefits that grazing animals can bring to wildlife and biodiversity and this should be considered in any future management planning, as well as the obvious economic issues with reducing grazing numbers.

Ruminant agriculture can also deliver benefits in terms of biodiversity and grassland management and should not be seen as counter to nature restoration, rather part of the solution when managed in the right way.

It is essential to have woods that balance the need to generate income through commercial forestry with biodiversity, landscape, and amenity. Commercial forestry already occurs in the less mountainous areas of the National Park and plays a significant role in sequestering carbon, providing jobs, and creating places for people and nature.

It is also important that we keep planting forests to meet demand and avoid the need to import more timber. Scotland is the only part of the UK to have set wood use targets, a vital step to decarbonise construction by substituting 'carbon-heavy' building materials like concrete and steel with low energy wood, a material that locks away carbon and which can be easily reused and recycled.

All of the above combined has a significant role to play in ensuring the benefits of a Just Transition are felt by the local community as a whole, and not just a select few.

A17: Improved Monitoring of Changes in Nature - Develop improved monitoring and reporting to measure progress in nature restoration. Create a State of Nature monitoring and reporting system for the National Park that provides accurate data and knowledge on the condition of nature, and where action needs to be strategically focused.

We are supportive of this objective and have had some insight into this work through our involvement with the Cairngorms National Park Nature Strategy Group.

It is important that a holistic approach is taken to conserving biodiversity and that single species management programmes sit within a wider ecosystem approach, we feel a Loch Lomond and Trossachs State of Nature monitoring and reporting system (similar to the Cairngorms Nature Index) will be an asset and will allow for evidence-led decisions to be taken and allow for targeted conservation action where it is most needed.

Working with land managers to attain Wildlife Estates Scotland accreditation will also help to monitor and enhance this work.

A18: Land Use Change - To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs. **Facilitate a Regional Land Use Partnership and prepare a Park-wide Land Use Framework setting out collaborative land use change objectives and priorities across multiple land holdings at a landscape scale.**

Regional Land Use Partnership & Park-wide land use framework - SLE generally supports the concept of Regional Land Use Partnerships as a delivery mechanism of outcome-driven landscape scale change. Promising results have been seen in the various pilot programmes and we would be keen to engage on developing plans for a park-wide land use framework.

However, this should not replace dedicated partnership working between the park authority and land managers.

Engagement with landowners and rural businesses during the development of any framework or RLUP will be critical to its success. Ongoing engagement once any framework is established is also crucial to ensure expectations between the landowners, rural business and wider community are managed.

We need well governed regional land use partnerships to incentivise and encourage cooperation and an integrated approach to land management. We would like to see a clear role for RLUPs throughout Scotland to encourage and support land management to meet specific goals and targets. Particularly in the park context, there needs to be a clear vision of how the RLUP delivers better outcomes than at present, many of the roles to be played by RLUPS elsewhere can already be fulfilled by the national park authority.

It is important that any framework focuses on encouraging desired management approaches whilst still accepting that other management approaches are well within the legal parameters and the landowner has the right to have final decision-making powers on their land management, even if that particular approach is not given an uplift within the framework or RLUP.

A19: Land Use Change – To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs. Promote the integration of land use and development opportunities within emerging area-based strategies prepared through the new Local Development Plan.

It is important that all the objectives detailed in a Regional Land Use Partnership and park-wide land use framework should be complimentary with the Local Development Plan. Similarly the local development plan should be enabling for the land use objectives.

A20: Land Use Change – To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs. Facilitate

**strategic, joined-up planning for larger land holdings (or multiple neighbouring holdings), incorporating the business and investment opportunities coming from climate and nature restoration land use changes.**

Facilitate Landscape Scale Delivery – the objectives to deliver joined-up planning for larger land holdings (or multiple neighbouring holdings), incorporating the business and investment opportunities coming from climate and nature restoration land use changes is important. Much of what is wanted can be delivered through a Regional Land Use Partnership or a park-wide framework.

There is also a need to ensure a Just Transition and not to demonise current practices and people working within land management currently.

A21: Land Use Change – To transform land use within the National Park over time, to ensure that it delivers much more for climate and nature, as well as local food and high-quality jobs. Encourage and support land managers to shift more suitable land towards low carbon and regenerative agriculture as a primary purpose.

SLE supports this aim, but it requires careful communication and clear objectives, not just broad principles.

A22: New Funding Streams – To develop funding support opportunities that help deliver wider public benefits from our land, including for climate and nature. Engage in national level land reform policy discussions to advocate for a shift in land use policy support and regulation schemes. Aim to deliver a change in the way that land and water is managed, towards a new, integrated system that does not continue to deplete nature and instead restores it as well as support production and jobs.

SLE strongly supports an integrated approach to land and water management, as detailed in our Route 2050 report. We generally support the preparation of Local Place Plans and have called on the Scottish Government to consider how these can be used to further their land reform ambitions without the need for further cumbersome legislation. This should only be promised if every community has equal resource and support to undertake this, and we would strongly encourage landowners to be involved in the process at an early stage.

This will highlight areas of contention or opportunity very early on and may also be an opportunity to directly strengthen some relationships between landowners and communities. There is a huge opportunity here to get landowners and communities to work together to deliver for the Park and better understand each other's ambitions, capabilities and limitations.

A23: New Funding Streams – To develop funding support opportunities that help deliver wider public benefits from our land, including for climate and nature. Encourage, develop and pilot new funding streams and projects, such as private ethical green finance and new investment markets (e.g. carbon credits and biodiversity credits) that bring new, multi-year funding to allow delivery of land-use based climate and nature restoration benefits across the Park.

The Scottish Government Climate Change Plan acknowledges that landowners and private investors are an important part of the solution to climate change and wants to see a collaboration between “carbon buyers, landowners and intermediaries”. If we are to achieve ambitious climate change and biodiversity targets, the public purse alone cannot support the investment that is required, and this presents an opportunity for private finance.

However, it is landowners of all types and sizes that are being asked to take the risks over the long-term.

SLE has recently responded to an HMRC Consultation on the taxation of environmental land management and ecosystems service markets. How income generated by the emerging carbon markets is treated from a taxation perspective (capital or trading) could act as a disincentive if it cannot be set off against scheme costs upfront.

In addition, it is important that land formerly in agricultural use but moving into environmental land management is not disincentivised by the loss of Agricultural Property Relief (APR) from inheritance tax.

The market is new and dynamic – investment is already happening, and this presents both risk and opportunity. The Scottish Government's National Strategy for Economic Transformation (NSET) includes a commitment to establishing a values-led, high-integrity market for responsible private investment in natural capital, supported by a national project pipeline for nature-based solutions.

It is important to note that private finance schemes do not need to solely link to carbon credits or biodiversity tokens. It is also possible to design a specific scheme linked to a nature-based solution and approach key targeted corporate bodies and negotiate their buy in. Examples already exist with water companies and insurance companies working directly with land managers in projects that improve water quality and reduce flooding within a catch area. These projects have a positive effect of capturing carbon in the soil or through riparian planting but that is not the sole measure of value. For the water companies it is reduced treatment costs and for the insurance companies a reduction in payouts for flood damage along with reduced insurance premiums for the individuals in the communities.

The park is incredibly well placed to deliver these sorts of schemes alongside land managers and the wider community.

A24: Engaging Communities in Land Use Decisions – To engage communities and other stakeholders more effectively in land use change decisions. Support and enable communities to engage with land managers and influence land use decisions affecting their futures and discuss what opportunities there might be to benefit all parties.

Landowners and land managers are custodians of the natural assets required to help Scotland meet its ambitious net-zero targets, and many have taken and continue to take positive steps to address the climate and biodiversity crises. Landscape scale projects have and continue to be a major factor in the ability to deliver objectives in key areas such as forestry, farming, renewables, and rural housing.

The South of Scotland Golden Eagle Project has overseen the release of around 40 golden eagles since 2018. As a result there are now more golden eagles in south Scotland than at any time recorded in the last two hundred years. Effective community engagement has been the cornerstone of success, with more than 10,000 volunteers and project participants of all ages. This is a great example of a collaborative partnership project with fantastic community engagement.

Relationships between communities and landowners are important here, and while most landowners in the area do undertake extensive community engagement activities already (some have full strategies), it would be helpful if the Park played a role in bringing them together to foster most constructive relationships and working and allow communities to understand how different aspects of land management are carried out, and what they can reasonably expect to influence. SLE can also help by playing a role in sharing best practice. This would foster constructive working and trusting relationships for the future.

A25: Green Jobs, Skills and Business Opportunities – To support change in the land management sector to better meet and benefit from the opportunities from changing land use priorities. Develop and deliver training and further education opportunities that meet the anticipated demand from scaling up climate and nature restoration projects as well as and regenerative agriculture and sustainable forestry. Help **local communities and land managers to turn these into employment and volunteering opportunities through training and re-training.**

SLE is part of the CESAP Land Management Subgroup. From the perspective of the nature-based and land-based sectors, The Green Jobs Workforce Academy is not delivering what is required and resources could be better utilised in different ways. Instead, efforts should be made to mainstream information on nature-based jobs in My World of Work and provide links to other established websites (such as Green Jobs for Nature and Lantra) that already have some good, up to date content.

We support any efforts to increase the awareness of green and rural skills and get more people, especially young people, into rural jobs. Many of our members are reporting a shortage in the skills they need to run a successful rural business and offer opportunities to people in rural areas. We would like to see the LLTNP work with landowners in the area to identify these learning and volunteering opportunities, supported by relevant educational institutions.

A26: Green Jobs, Skills and Business Opportunities – To support change in the land management sector to better meet and benefit from the opportunities from changing land use priorities. Create longer-term confidence for land management contractors and service providers by scaling and packaging up projects more strategically and over multiple years.

We support any efforts to increase confidence in the rural jobs market, multi-year projects and landscape scale projects will inherently provide that confidence for both employers and those looking to work in rural areas.

A27: Policy for Restoring Nature for Climate (1): Restoring significant areas of peatland and protecting this precious resource by repairing degraded peat soils and ensuring impacts from grazing animals are minimal.

We support the need for further localised reductions in deer where impacts from deer remain unsustainable and act as a barrier to land use change, principally native woodland restoration, expansion, and peatland restoration.

However, it's important to acknowledge that deer are an important asset of the National Park and managed sustainably produce a wide range of social, economic, and environmental benefits both locally and in the wider public interest, as well as being an asset for tourism. It is therefore important that deer management strikes a balance between the climate and biodiversity crises along with the important economic and cultural role of deer in Scotland. Sweeping maximum deer densities is unhelpful to achieving this balance.

80% of Scotland's peatland is thought to be degraded with significant implications for greenhouse gas emissions. At present, peatland in the National Park acts as a source of global warming, rather than a sink and its potential for carbon sequestration has not been fully realised as yet.

In 2020, the Scottish Government announced a £250 million ten-year funding package to support peatland restoration, with a target of restoring 250,000 hectares of degraded peatland by 2030. For that ambition to become reality, it requires farmers, landowners and land managers to play a huge role in pushing forward progress on the ground, obtaining funding and then working with specialist contractors – being able to work at scale is a significant advantage.

Significant challenges remain, however. Peatland action officers have been overwhelmed with the level of interest, and by the time an application has been approved, the delivery window is incredibly tight, and they are then working against bad weather and the breeding bird season. Contractors are willing and able to do the work, but it requires payments to be made on time and for things to run smoothly – this does not always happen. Concerns remain over uncertainties in the carbon credit market, in particular the long-term liability they put in place. Care is needed to ensure that all actors in the market are clear as to their roles and responsibilities.

A28: Policy for Restoring Nature for Climate (2): Increasing the quantity and quality of tree cover through planting and promoting natural regeneration by significantly reducing grazing animal pressure.

SLE members in the LLTNP, who are predominantly in the private sector, have and continue to play a vital role in helping Scottish Government achieve its ambitious tree planting targets and we welcome the ambitious target of increasing the quantity and quality of tree cover through planting and promoting natural regeneration.

SLE supports opportunities for native woodland expansion and where practical for this to be delivered by natural regeneration. Where this is feasible it is important for browsing pressure to be kept at an appropriate level to allow this process to take place.

Trees, forests and woodlands have a key role to play in mitigating climate change and restoring biodiversity, both locally and globally. Tree planting provides multiple benefits, such as enhancing habitat networks, improving water quality by providing a buffer area, or maintaining water temperatures, providing a diversity of habitats for biodiversity and contributing to carbon sequestration – amongst other benefits.

The right tree in the right place is crucial and we would like to see a balanced approach taken integrating tree planting with other land-based businesses ensuring we get the best from land. For example, riparian planting and agroforestry schemes offer greater value for nature, but also have higher costs of establishment and management with little commercial return.

The process of natural regeneration and tree establishment requires there to be enough seed source, conditions need to be right to support germination and initial growth and there needs to be protection from browsing pressure.

A29: Policy for Restoring Nature for Climate (3): “Ensuring that efforts to sequester carbon also help restore nature and contribute to establishing new nature networks”

We support this policy and recognise the important role nature restoration and nature networks can play in delivering carbon sequestration.

We're seeing land managers across Scotland taking an increasingly pro-active approach to restoring degraded ecosystems – whether that be tree-planting, restoring natural processes or species translocations.

We would like to see future work encourage land managers to continue to take an ecosystems-based approach, working together at a landscape scale level to tackle the biodiversity and climate emergencies, as it is unlikely that biodiversity conservation goals will be met by solely protecting habitats or species or designating certain areas for management.

A landscape scale approach is essential, and we feel a stronger commitment from the Loch Lomond and Trossachs National Park Authority could be made with regards to the development of an ecological network. There are opportunities to be had to connect designated sites with other landscape scale initiatives already taking place within the National Park, and other examples such as Cairngorms Connect and the Wildlife Estates Scotland initiative highlight the benefits of this approach.

A30: Policy for Restoring Nature for Climate (4): Working with land managers and communities to secure new sources of funding that provides new opportunities and help support a just transition to a net zero and nature positive National Park.

SLE generally supports an element of targeted rural payments. However, rural payments support will be led by central government (Holyrood), and we know from manifesto commitments that by 2025 half of all funding for farming and crofting will shift to conditional support with targeted outcomes for biodiversity gain and a drive towards low carbon approaches.

If an element of future support is to be 'conditional' then there is an expectation that some data collection will be required in order to evidence an outcomes-based approach to support. A robust evidence base is required to ensure that outcomes sought can be achieved through the changes being implemented, and appropriate levels of funding will be required to encourage uptake of data collection.

There are business efficiency and long-term business sustainability benefits for farmers and land managers in maintaining and improving their natural assets. Information and advice services are vital to assisting continuous improvement, and it is essential that rural businesses have access to skills, training, and knowledge to become more productive and resilient.

The plan must take an integrated approach to land use, no longer looking at forestry, farming, moorland, water quality and other policies in isolation. The focus of capital funding should be to support the achievement of outcomes, rather than prescribing exactly how to go about achieving them. Land managers should be empowered to make decisions to best deliver the outcome expected, with support and advice.

As part of an integrated approach to land management, it is important to understand and enable a mix of land uses. Encouraging cooperation at the landscape scale on issues such as watercourse management, flood mitigation, hedgerow planting and woodland creation will have a greater impact and deliver greater benefit than land managers working in isolation.

New sources of private funding must make clear the benefits and liabilities to all involved, which will enable informed choices to be made. There is a danger that land managers entering

into agreements which are “endorsed” feel pressure to take up these new funding streams and have issues later. The long-term nature of these agreements mean they need to be fully investigated.

A31: Policy for Restoring Nature for Healthy Ecosystems (1): Ensuring that peatland restoration programmes are expanded to deliver multiple benefits including carbon sequestration, improved biodiversity and water storage.

The peatland restoration challenge in Scotland is huge, and one which our members are embracing. The Scottish Government, within its Climate Change Plan has a target to restore 250,000 ha of peatland by 2030, this equates to 25,000 ha per year. It has become very apparent that there is a mismatch between the aspirations of peatland restoration ambitions and the collective ability to deliver at scale. For 2020-21, the total volume of peatland restored in Scotland was 5,658ha. For 2021-22, the total number restored was 5,370ha. (We await data for the 2022-23 financial year.) Much of this restoration is done by private landowners, who invest their time and money into projects which is seldom recognised.

The short-term nature of funding and a lack of flexibility over timescales for implementation has meant that for many land managers peatland restoration has either been extremely challenging to deliver or work has been unable to progress. Bad weather (generally January until April but sometimes from December), the bird breeding season (February to late autumn), land management activities (deer stalking) and the time taken to process funding applications have combined to constrain the restoration window to around 6 months per year.

A shortage of access to qualified and experienced peatland contractors has been limiting delivery potential with demand of qualified workers outstripping supply. There are also issues with the bureaucracy involved in application processes which can put off potential applicants. It is important to recognise the role many landowners play within peatland restoration and a situation where those with a proven track record of delivery are able to access a lighter touch application process would enhance uptake of peatland restoration projects.

There is a positive willingness among land managers to pursue peatland restoration and we fully support the ambitious target set within the National Park plan. However, scaling up targets can't happen without significant coordination, and it will be important that the challenges around delivery are addressed, and we strongly encourage the National Park to work with others at a national level to address these.

We would like to see mention of monitoring within this objective. It is important to understand if the quality of restoration being undertaken is to a satisfactory standard. Longer term monitoring could also help provide important information on changes in peatland condition following restoration, helping to evaluate the success of different restoration techniques and allowing for knowledge transfer.

A32: Policy for Restoring Nature for Healthy Ecosystems (2): Expanding our connected network of trees with an increased proportion of native tree and shrub species and improving their quality through proactive management, including management of invasive Rhododendron.

SLE members in the LLTNP, who are predominantly in the private sector, have and continue to play a vital role in helping Scottish Government achieve its ambitious tree planting targets

and we welcome the ambitious target of increasing the quantity and quality of tree cover through planting and promoting natural regeneration.

We fully support opportunities for native woodland expansion and where practical for this to be delivered by natural regeneration, where this is feasible it is important for browsing pressure to be kept at an appropriate level to allow this process to take place.

Trees, forests and woodlands have a key role to play in mitigating climate change and restoring biodiversity, both locally and globally.

The process of natural regeneration and tree establishment requires there to be enough seed source, conditions need to be right to support germination and initial growth and there needs to be protection from browsing pressure. While natural regeneration brings many benefits, it can mean that establishment takes longer and not in the desired areas, so there will need to be balance and a realisation of these issues.

Nearly half of the National Park is within Scotland's rainforest zone, and its protection and enhancement is understandably one of the Park Authority's top priorities. As a member of the Alliance for Scotland's Rainforest, SLE supports landscape-scale rainforest restoration, and where necessary active management of invasive non-native species such as rhododendron. Terrain is often challenging so the support of contractors and volunteers can be needed to access difficult sites.

Tree planting provides multiple benefits, such as enhancing habitat networks, improving water quality by providing a buffer area, or maintaining water temperatures, providing a diversity of habitats for biodiversity and contributing to carbon sequestration – amongst other benefits.

Land managers recognise the benefits of integrating trees with other land uses without the need to take large areas out of production. Getting the right tree in the right place is crucial – including riparian corridors, next to rivers. A balanced approach should be taken to new planting, integrating tree planting with other land-based businesses ensuring we get the best from land.

[A33: Policy for Restoring Nature for Healthy Ecosystems \(3\): Strategic landscape-scale management](#)

**to significantly reduce unsustainable deer and sheep grazing and browsing pressures and to allow the recovery and expansion of tree cover and reduce trampling of fragile peat soils.**

Land managers across the National Park – and indeed across Scotland – are increasingly taking an ecosystems-based approach, working together to deliver integrated land use at a landscape scale to tackle the biodiversity and climate emergencies. It is important to acknowledge that deer are just one factor within this, with other herbivores, farmed and wild, as well as the impact of access in certain areas also having an effect.

We recognise and support that herbivore management is a crucial component of addressing the climate and nature crises in upland Scotland. Changing management practice to restore habitats at scale is recognised as a key part of Scotland's contribution to mitigating climate change and reversing biodiversity loss.

Generally, there is an acceptance of the need to cull more deer in line with Govt/NS policy, but concern about unrealistic national targets for short term deer number reduction and for tree regeneration. Our members are looking for a more balanced approach particularly in the uplands, giving equal weight to deer welfare and employment, skills retention and estate economics.

However, and as previously stated, more work needs to be done to move away from blanket targets for numbers such as deer and make it clear that the carrying capacity of the land will be taken into account. Deer management decision making must be based on evidence, and it should be grazing impacts rather than numbers which are used in setting and meeting management objectives.

The next few years will see a change in Scottish Government policy as it delivers the Scottish Biodiversity Strategy and implements the recommendations of the Deer Working Group Report on the Management of Wild Deer in Scotland ('the DWG recommendations'). Inevitably, the focus will be on the technicalities of managing deer. If workable solutions are to be found, any changes will rely on constructive dialogue between the range of stakeholders that are involved in upland deer management.

Natural regeneration is an important part of woodland regeneration, and where this is feasible it is important that browsing pressure is kept at an appropriate level, in order to allow this process to take place.

We would like to see increased recognition of the contribution of private and other non-NGO landowners to peatland restoration and soil health improvements, and greater resource provision to those on the ground to support implementation.

Information and advice services are vital to soil health improvement. There are business efficiency and long-term business sustainability benefits for farmers and land managers if they maintain soils in good health.

#### A34: Policy for Restoring Nature for Healthy Ecosystems (4): Taking a strategic approach to controlling Invasive Non-Native Species at a landscape scale.

Land managers are taking an increasingly proactive approach to restoring degraded ecosystems, which might include non-native invasive species removal, together with tree planting, restoring natural processes and species translocations.

Species reintroduction or removal must come with clear policies on how decisions are made, how balanced and fair consultations are carried out and what measures are in place to mitigate any negative associated impacts, prior to further reintroductions/removals.

As previously noted, nearly half of the National Park is within Scotland's rainforest zone, and its protection and enhancement is understandably one of the Park Authority's top priorities. As a member of the Alliance for Scotland's Rainforest, SLE supports landscape-scale rainforest restoration, and where necessary active management of invasive non-native species such as rhododendron. Terrain is often challenging so the support of contractors and volunteers can be needed to access difficult sites.

Likewise, the ongoing situation with bracken control (which un-controlled presents a wildfire risk as well as a growing risk to human health, with no national tick control strategy). Asulam

has received emergency authorization for bracken control every year since bracken was removed from the label 12 years ago. Yet insufficient work has been done to find suitable alternatives. Emergency approvals are legally only allowed on a one-year basis. Similarly for neonicotinoids for crops. Anything longer must come from a full re-application, that is unlikely to happen without government intervention and the company being prepared to do trials to get new data.

There can be an imbalance between those who experience benefits of a species / habitat change (e.g. tourism industry, wider public) and those who bear the costs (e.g. land-based businesses – aquaculture, agriculture, forestry).

In the overall evaluation it is therefore important to consider both the ecological and socio-economic impacts.

A35: Policy for Restoring Nature for Healthy Ecosystems (5): Improving the freshwater and marine environments by restoring rivers and wetlands and increasing water quality by addressing diffuse pollution, sewage discharge and fertiliser run-off from land uses.

Our members work to conserve Scotland's valuable wild freshwater fish and fisheries, and the wider aquatic environment on which they depend. Wild fisheries are a key component of the rural economy, bringing many benefits to communities through the provision of tourist facilities and accommodation. Good wild fisheries management can have numerous benefits to biodiversity, water quality and flood mitigation.

For example, reservoirs within the park could be managed to mitigate climate change by absorbing peak winter flood flows. At present they are kept as full as possible for as long as possible to maximise water availability. The legally mandated and SEPA licensed compensation water flow regime from the accumulated Loch Katrine scheme does not correlate with the standards of modern salmonid knowledge. The Forth District Salmon Fishery Board will probably be arguing for freshets rather than base flow.

Similarly, work needs to be done on the control of unintentional releases of non-native fish. Rainbow trout escapees from Trossachs Fish Farm are not uncommon in Callander.

It is important that rivers are managed in a holistic manner for the benefit of a range of species. Catchment- scale river restoration projects are helping to reverse the dramatic decline in salmon stocks and ensure a sustainable future for this iconic species.

A36: Policy for Restoring Nature for Healthy Ecosystems (6): Improving the condition of existing Designated Sites and delivering actions that protect, expand and reconnect the special species and habitats found there.

Wildlife management can play an important role in conserving threatened species and habitats, especially in the wider context of both the climate and nature emergencies. Future work must seek to encourage land managers to work together at a landscape scale to enhance the benefits provided. Facilitation of catchment and landscape scale projects is essential to the successful delivery of biodiversity objectives at the scale required.

With regards protected areas, there needs to be a clear link between action and result which will help focus land managers on owning and understanding the results and management actions, rather than simply following a set of prescriptions.

A37: Policy for Restoring Nature for Healthy Ecosystems (7): Fully adopting and delivering the principles of the National Planning Framework 4 and ensuring that new development in the National Park takes a net gain approach to protecting and restoring nature on and around development sites

Land managers are at the forefront of a nature-based economy, delivering public benefits and profitable outcomes. They are eager to contribute to environmental improvements and achieve the environmental and business opportunities associated with a range of rewilding approaches whether it is active management at a holding level, passive management at landscape scale or anything in between.

Last year, it was good to see NatureScot bring forward a select development of case studies highlighting both the challenges and opportunities that rewilding projects have brought land managers across Scotland, UK and Norway in recent years. However, there remain gaps in the evidence base on the consequences of rewilding. A better understanding of the potential socio-economic impacts is needed.

Land managers are faced with the pressing challenge of developing conservation actions that promote biodiversity retention and recovery to previously observed levels while supporting economic and societal development.

As the National Planning Framework 4 highlights, planning carries great responsibility – decisions about development will impact on generations to come. Putting the twin global climate and nature crises at the heart of our vision for a future Scotland will ensure the decisions we make today will be in the long-term interest of our country.

We live in challenging times, but better places will be an important part of our response to our strategic priorities of net zero and the wellbeing economy – which research demonstrates land managers across Scotland are making a hugely positive contribution to.

A38: Policy for Shaping a New Land Economy (1): Piloting a Regional Land Use Partnership and from it delivering a Regional Land Use Framework to promote a collaborative approach to positive land use change delivering multiple benefits.

We need well governed regional land use partnerships to incentivise and encourage cooperation and an integrated approach to land management. We would like to see a clear role for RLUPs to encourage and support land management to meet specific goals and targets.

We need to see significant investment being made in ensuring we have the available skills to deliver on the above. Contractor capacity, skills and funding are key factors.

For example, our members have a positive willingness to pursue peatland restoration but there are some frustrations at the difficulties of delivery.

Research conducted by BiGGAR Economics on the wellbeing economy work has highlighted the range of ways in which members contribute to Scotland as whole – and specifically how the land-based business sector already delivers a myriad of benefits to rural Scotland.

A39: Policy for Shaping a New Land Economy (2): Ensuring planning policies support rural development which helps sustain land businesses, employment needs and local communities.

SLE supports a clear and long-term plan for the future of rural Scotland that includes public and private investment to incentivise and reward responsible land management, allowing businesses to develop strategies to ensure both their financial viability and to protect and enhance the natural environment.

Incentive arrangements need to be stable and consistent so that forward planning can be exercised.

Policies and messaging from government and its agencies must foster a climate of cooperation within communities (of which landowners are part) so we can solve problems and achieve shared ambitions.

Future legislation must enable this to continue and more to be done by public, private and community landowners, with the focus on delivery rather than the ownership model.

A40: Policy for Shaping a New Land Economy (3): Working with national partners to secure more effective use of grants and subsidies which are tailored to support better outcomes for nature. This includes: Developing and piloting new funding models which can blend public and private finance to support multi- year large-scale nature restoration projects.

We support this policy as it is essential for businesses to have clear and long-term support and messaging from bodies to enable them to plan and develop with confidence and to ensure that desirable outcomes are possible. The sound economics of these businesses will be essential to deliver the social and economic benefits.

Any targeting of support and payments however must enable land managers to retain control of their business and make decisions on that basis. RLUPs should play an important role in targeting support to the areas and practices which will deliver most benefit against defined outcomes.

The imperative to deliver 'nature-based solutions' to biodiversity and climate change has never been stronger and the expectations being placed on the land management sector are considerable. Effective, innovative funding mechanisms that incorporate public and private investment in a blended finance approach will be important in ensuring there are increasing financial flows invested in nature-based solutions but there are complexities which need to be addressed.

The Green Finance Institute estimates that between £15 billion and £27 billion, in addition to current public funding, is needed over the next 10 years to restore nature across Scotland.

The Scottish Government have acknowledged that much of this will have to come from the private sector. Therefore, it is important not to put at risk current work when looking at future work to meet these challenges.

The market is new and dynamic – investment is already happening, and this presents both risk and opportunity. The Scottish Government's National Strategy for Economic Transformation (NSET) includes a commitment to establishing a values-led, high-integrity market for responsible private investment in natural capital, supported by a national project pipeline for nature-based solutions.

A41: Policy for Shaping a New Land Economy (4): Agriculture – delivering sustainable and regenerative agriculture to continue to support livelihoods, rural communities and food production whilst delivering restoration of our soils, expansion of tree cover and reduced grazing animal pressures on habitats.

Farming has a key role in delivering an integrated land use approach, so that the right balance is struck between economy, environment and society. Farm businesses must become more resilient, market-led and profitable, and the sector must become more attractive to new entrants.

It is vital that Scotland's productive capacity is maintained and where possible increased as we enter a time of potentially major change and uncertainty in our food, drink and energy crops markets. Scotland has issues with critical mass of its land-based industries, including food and drink and timber. Any further loss in capacity put the whole industry in jeopardy. It is important therefore that Scotland still maintains primary production and ensures that the value, jobs and benefits are maintained.

In addition, no information has been provided about the ongoing cost of deer management. If landowners and managers are expected to finance this, will support be made available?

Given that the sporting rates that landowners pay are calculated on holding size as opposed to deer numbers, and will not alter even with reduced deer numbers, adding additional financial pressure onto these rural businesses will undoubtedly cause unforeseen issues in the future.

A42: Policy for Shaping a New Land Economy (5) Forestry – delivering timber production whilst expanding and improving a resilient and sustainable forest network.

A balanced approach should be taken to new planting, integrating tree planting with other land-based businesses ensuring we get the best from land – allowing for both timber production, carbon sequestration and biodiversity and habitat gain.

Gresham House forecasts global timber consumption to rise by 270% over the next 30 years driven by urbanisation, decarbonisation and housing demand. At the same time, there is supply deficit forecast for 2050 of 1,130mn m<sup>3</sup> annually. The growth opportunity for sustainable forestry is therefore significant.

However, the method of establishment may not be fully compatible with the policy context to deliver the speed and consistency of woodland expansion required to meet the climate challenge. Meeting these demands also requires commercial timber, which in turn sequesters carbon faster than natives, therefore a mix of species, management types and establishment will be required.

We have concerns around the viability of creating the scale of woodland desired, with the means outlined.

Forestry of all forms has a crucial role to play in delivering benefits for the environment, society and economy. There is a danger that we focus solely on planting to address the climate change crisis and lose sight of the other multiple benefits trees, woodlands and forests deliver.

In pursuit of net-zero it would be easy to assume that planting as many trees as quickly possible is the solution but that is not the case. We must make sure to balance enhancing biodiversity with the goal of achieving net-zero.

A43: Policy for Shaping a New Land Economy (6) Enabling the creation of new naturebased green jobs and skills by mapping out capacity and skills shortages and supporting opportunities to grow employment and knowledge.

It is important as a starting point to define what is meant by 'nature-based', as this means different things to different people. Likewise, clarity will be needed on the definitions of 'New Land Economy', particularly what constitutes a "green job".

Similarly, more detail on the means of support to be offered and how it can be accessed by new and existing businesses.

Planning policies which are enabling for business development will greatly enhance the desired outcomes. Particularly with renewable energy, clear signals on how this is envisaged and how this can tie in with the wider policies will enable businesses to plan and develop further and faster.

The focus should be to support the achievement of outcomes, rather than prescribing exactly how to go about achieving them. Farmers and land managers should be empowered to make decisions to best deliver the outcome expected, with support and advice.

Rural businesses are expected to make significant changes over the next few years, and to support them in this, we should ensure that enhancing productivity, business resilience, and environmental benefit are top priorities.

A44: Policy for Restoring Nature with Ethical Green Finance (1) Takes an integrated approach in supporting environmental, social and economic benefits and which responds to local needs and opportunities.

The Scottish Government Climate Change Plan acknowledges that landowners and private investors are an important part of the solution to climate change and wants to see a collaboration between "carbon buyers, landowners and intermediaries".

If we are to achieve ambitious climate change and biodiversity targets, the public purse alone cannot support the investment that is required, and this presents an opportunity for private finance.

However, it is landowners of all types and sizes that are being asked to take the risks over the long-term.

SLE has recently responded to an HMRC Consultation on the taxation of environmental land management and ecosystems service markets. How income generated by the emerging carbon markets is treated from a taxation perspective (capital or trading) could act as a disincentive if it cannot be set off against scheme costs upfront.

In addition it is important that land formerly in agricultural use but moving into environmental land management does not lose its Agricultural Property Relief (APR) from inheritance tax.

A45: Policy for Restoring Nature with Ethical Green Finance (2) Provides benefits across public, private and community interests and supports a just transition to a greener economy. Community benefit can be delivered in many ways, and commercially viable businesses, which create jobs, housing and wider amenity value, help deliver much of what we all want to see in a thriving rural economy.

Collaboration and utilisation of all resources and expertise will help deliver the best outcomes that we all seek.

There are also other elements to consider as to the wider benefits. If judged through the single lens of net- zero, then private investment is to be welcomed.

However, the wider social impacts also need to be understood. For example, purchasers of land for environmental reasons have the same responsibilities as any other landowner, to involve and inform communities in what they are doing.

At the same time, the impact on local jobs, and crucially housing need to be considered, as they are vital to ensure we have thriving rural communities.

A46: Policy for Restoring Nature with Ethical Green Finance (3) Has included local engagement to inform land use decisions where possible by consulting on a land management plan.

The Partnership Plan can serve as a reference for individual plans put in place by land managers. Best practices from across the Park and beyond can also be shared.

Members would not welcome more active involvement of the Park Authority in the development of these plans as this would turn the process into a top-down exercise and disengage the actors on the ground who will be the implementors of such plans. Having the park plan as a reference point should be sufficient to provide clarity of thought from LLTNPA.

A47: Policy for Restoring Nature with Ethical Green Finance (4) Is from organisations that have made a public commitment to reaching Net Zero emissions by 2050 at the latest, with clear demonstrable activities to reduce emissions and signed up to a credible initiative to deliver on this commitment.

There needs to be an understanding that if we want to produce things then there will be a carbon impact, but this should not all just be offset and therefore 'exported or offshored'.

Sequestration is only one part of the equation; emissions reduction is the other. Businesses must strive through technological improvements to reduce their own emissions.

We should also acknowledge that there are current uncertainties around the potential returns and risks, making some private investors reluctant to get involved. While the desire and capital

are there, there is significant work to be done in inspiring confidence and in making 'nature-based solutions' an attractive green investment.

Alongside joined up policy and well-designed delivery mechanisms we need to be able to evidence the value and benefits 'nature-based solutions' bring and be able to demonstrate the contribution they are making towards achieving national targets if we are to give confidence and attract private investment.

A48: Policy for Restoring Nature with Ethical Green Finance (5) Is not finance derived from income associated with environmental damage, the extraction of fossil fuels or any unethical practices.

Investment in natural capital for carbon management should be both measurable and verifiable, such as through the government-backed Woodland Carbon Code and the Peatland Code.

Debating what is "ethical" could provide more issues that it solves, as ethics are inherently personal and to a degree nebulous. However, ensuring that those investing in green finance are reducing their impact prior to doing so would seem reasonable. However, rejecting flatly investment due to the sector it comes from would be too blunt an assessment without more detail.

#### Place – Sustainable Destination

B1: A Sustainable Visitor Economy – The National Park visitor economy is transitioning to offer more low emission, nature-connected tourism opportunities. Review existing nature-based tourism offerings and identify opportunities with our Destination Group of tourism businesses to support growth in delivery.

At a time when the popularity of such offerings is continuing to grow, Visit Scotland's research confirms that tourism and hospitality sectors are increasingly sensitive to consumer trends and economic conditions.

National Parks in Scotland have the scale and opportunity to both demonstrate and influence the creation and further development of existing and new nature-based tourism streams, potentially putting LLTNP at the forefront of such transitions to the benefit of its community, visitors and the natural environment.

B2: A Sustainable Visitor Economy – The National Park visitor economy is transitioning to offer more low emission, nature-connected tourism opportunities. Work with national agencies and organisations to develop practical toolkits and other approaches to help tourism businesses maximise the market opportunities in low carbon tourism.

Visit Scotland have developed a range of toolkits that can be adapted to meet the requirements of individual businesses and their target audiences.

These range from cycling to inclusive access, and specific recommendations for inbound visitors from China.

By collaborating locally, key messages and branding can be further developed and shared with partners across the LLTNP. SLE members would be keen to explore further how they can collaborate with the park to highlight this type of tourism.

Sustainability of this is key however, with thought given to managing some of the negative impacts such as dirty camping and littering, which run contrary to the purpose.

B3: Inspiring Action for Nature and Climate – Outreach and outdoor learning programmes are focused on building understanding of the challenges facing our planet, inspiring action for nature and climate and promoting the wellbeing benefits of enjoying the outdoors. Develop guiding principles for our work in nature connection and an outreach/outdoor learning programme to promote climate and nature conscious behaviours.

Research by the University of Edinburgh and other bodies has shown the benefit of outdoor education across all age ranges. Such studies have consistently highlighted the value of such activities for younger audiences.

*One of the key findings states that 'For both primary and secondary schools the Environmental Studies section of the current 5-14 Guidelines provide the greatest curricular opportunity for outdoor education to study the natural heritage, both in terms of content and thematic and project based opportunities.*

*Geography and biology continue to provide opportunity into middle and upper secondary. Health related initiatives are also sources of opportunity for outdoor education in general'.*

These findings, together with the knowledge that outdoor learning also has significant health benefits throughout our lifetime, should be the drivers for such programmes within the LLTNP.

B5: Inspiring Action for Nature and Climate – Outreach and outdoor learning programmes are focused on building understanding of the challenges facing our planet, inspiring action for nature and climate and promoting the wellbeing benefits of enjoying the outdoors. Review and realign National Park Authority educational and outreach resources and programme with Future Nature priorities and key messages.

The LLTNP existing Future Nature policies, and key messages have seen some positive outcomes. These, and future updates, should be used as the foundation of any educational and outreach resources in the future to ensure consistency of message and targeted delivery priorities.

B6: Inspiring Action for Nature and Climate – Outreach and outdoor learning programmes are focused on building understanding of the challenges facing our planet, inspiring action for nature and climate and promoting the wellbeing benefits of enjoying the outdoors. Develop and deliver National Park local schools 'Nature Network' project.

National Parks in Scotland have some of the greatest opportunities to both demonstrate and champion education and learning, particularly to younger audiences.

The Scottish Government's learning curriculum does not prescribe the context (e.g. outdoors) for learning, even for specific subject areas, and research evidence from the

University of Edinburgh suggests that the presumption and consequence is that teaching will take place indoors.

The 'Nature Network' project should be seen as one important element of overcoming this stance, although it should be recognised that for some educational establishments, financial constraints may make the outdoor option impossible to deliver without further support.

B7: Inspiring Action for Nature and Climate – Outreach and outdoor learning programmes are focused on building understanding of the challenges facing our planet, inspiring action for nature and climate and promoting the wellbeing benefits of enjoying the outdoors. Bring together National Park education and volunteering providers to build consensus on objectives and better align delivery to address nature and climate priorities.

The utilisation of knowledgeable and engaging volunteers for educational purposes is well based within organisations such as the National Trust for Scotland, Historic Environment Scotland and other such organisations.

Such initiatives should be at the forefront of the delivery of any educational offering to ensure that such skills and knowledge are not lost but shared with others.

B8: Support communities across the National Park to access funding for their community-led local development priorities and encourage community-led activities that help achieve priorities identified in the Partnership Plan. Continue to support the Walk in the Park programme of wellbeing walks.

The Walk in the Park programme should certainly continue as part of the LLTNP strategy. The value of walking extends beyond the well-known health benefits, and for many organisations it offers a valuable insight for participants into a natural environment they have seldom, if ever visited.

Such schemes have also been shown to subsequently encourage volunteering activities across a range of disciplines and would therefore be beneficial for supporting the LLTNP team.

B9: Better communicated and designed opportunities to access the National Park and become involved in its work are reaching and engaging previously underrepresented audiences and have enabled improved diversity. Continue to develop the role and membership of the National Park Youth Committee in providing a youth voice, ensuring the priorities of young people are reflected in policies and decisions.

The National Park Youth Committee is a valuable resource for the LLTNP, and wider society. The scheme should be further developed in ways that will encourage young people to feel an affinity with the National Park, and thereby share in its values and objective with others.

B10: Better communicated and designed opportunities to access the National Park and become involved in its work are reaching and engaging previously underrepresented audiences and have enabled improved diversity. Develop communication approaches to ensure all opportunities to access or become involved in the work of the National Park are reaching underrepresented groups.

Outreach programmes have been proven to benefit both individuals and organisations across many sectors. As Scotland increasingly becomes a diverse multi-cultural place to live, LLTNP should seek ways to engage with, and where possible support such individuals and groups for mutual benefit.

Activities such as 'Behind the Scenes' days have been held successfully within other organisations as part of their engagement programmes to encourage greater understanding and appreciation of the work involved.

B11: Volunteering opportunities across the National Park have been expanded to enable wider opportunities for people from outside the Park to actively participate in nature restoration and climate action, use and develop skills and support our Ranger Service to engage with our visitors and communities. Develop communication approaches to ensure all opportunities to access or become involved in the work of the National Park are reaching underrepresented groups.

LLTNP should invite teams from organisations and underrepresented bodies to open days, through which there will be subsequent opportunities to connect with those who may never have considered that becoming involved with, or working for a National Park was possible.

Sustainable travel options will be required for this to ensure that negative impacts are minimised.

B12: Volunteering opportunities across the National Park have been expanded to enable wider opportunities for people from outside the Park to actively participate in nature restoration and climate action, use and develop skills and support our Ranger Service to engage with our visitors and communities. Refresh the National Park volunteering programme to rebuild volunteer numbers following the disruptions of the COVID-19 pandemic, seeking to expand the diversity and including for young people.

Volunteering as part of a largely rural based organisation and team has traditionally been linked to practical working and activities in the outdoors.

Such traditional parameters effectively narrow the scope of opportunities for both volunteering and salaried staff, and the ability of organisations to recruit and utilise knowledgeable and skilled people for mutual benefit.

B13: Multi-year Place Programme— A multi-year place programme approach has delivered an initial phase of co-ordinated improvements. Complete Strategic Tourism Infrastructure Development Studies, engaging with local communities, partners and stakeholders.

Visit Scotland's 'Trends for Tomorrow' research and horizon scanning has identified how consumer trends are expected to shape tourism requirements in the near future. These include: localism and authentic experiences, adaptable adventure, workcations, artisan retail food and drink, voluntourism and wellness.

A LLTNP Strategic Tourism Infrastructure Development Study focusing upon these themes should form an important element of that research.

B14: Multi-year Place Programme— A multi-year place programme approach has delivered an initial phase of co-ordinated improvements. Deliver a multi-year Place Programme coordinating investment by partners public bodies on priority visitor infrastructure projects that support: » People and Place » Climate and Nature » Inclusion and improved accessibility » Modal shift to sustainable and active travel

**» Visitor management and dispersal**

Visit Scotland's 'Trends for Tomorrow' research and horizon scanning has identified how consumer trends are expected to shape tourism requirements in the near future. These include, localism and authentic experiences, adaptable adventure, workcations, artisan retail food and drink, voluntourism and wellness. A LLTNP Strategic Tourism Infrastructure Development Study focusing upon these themes should form an important element of that research.

The Visitor Management Strategy groups that were initiated following the easing of COVID restrictions have demonstrated their worth, with monthly feedback from various agencies and bodies (including LLTNP) being sent directly to Scottish Government ministers. Through this process, additional funding has been made available to support those hotspot areas where visitor pressures are at their greatest. The value of continuing this process must not be overlooked and can be built upon.

B15: Multi-year Place Programme— A multi-year place programme approach has delivered an initial phase of co-ordinated improvements. Promote investment in digital and sensor technologies to improve visitor data gathering that informs responsive visitor services and real time information.

The greater the volume of relevant information that can be gathered, the better informed LLTNP will be in relation to visitor flow, access restrictions (where appropriate) and information. Traffic Scotland already have monitoring information available at their disposal to support such initiatives, and this could potentially be extended to visitor hot-spot areas that are not directly connected to the trunk road network.

The creation of a free to download app' highlighting current hot-spots, camping and motorhome availability, traffic restrictions and more could be developed as a resource for visitors. It would additionally enable live 'push-notifications' from LLTNP to inform visitors of events and any hazards such as severe weather conditions for water users. The app would additionally provide the opportunity for live feedback from visitors for monitoring and evaluation.

B16: Multi-year Place Programme— A multi-year place programme approach has delivered an initial phase of co-ordinated improvements. Ensure investment in visitor sites also enables the development of a growing and reliable EV charging network.

The rollout of affordable EV charging points across Scotland is not keeping pace with the registration of new EV vehicles, and whilst the Scottish Government's plans to integrate its ChargePlace Scotland network more closely with private charging networks is set to reach 6,000 points by 2026, this number will not be sufficient to meet anticipated demand. There is also huge variability in cost of charging, which often makes it uneconomical to use electric vehicles rather than fossil fuels.

The provision and location of charging points within the National Park will need to be carefully considered, and it is likely that some locations will not be suitable due to existing power network capacity, and physical logistics such as lack of parking spaces. With this in mind and to avoid competition and congestion, rapid EV charging point hubs should be considered at entry points to the National Park and alongside major trunk roads/junctions.

B17: Visitor Hubs— Ensuring investment in visitor hubs at, or linking to, Balloch, Callander and Arrochar/Tarbet will enable more sustainable ways to travel both to and within the National Park including links to improved active travel networks. Develop better designed place connectivity between rail, bus and water transport services at Balloch which also promotes and enables active travel opportunities.

Improvements to the public transport network to reduce the volume and impact of private vehicles within the National Park need to be considered as a priority due to the lead-in time from concept to delivery. If arriving by train, onward links to other areas of the National Park should be integrated as part of the public transport network.

Currently, there is a requirement for cyclists to book a space on the train to Balloch at least two hours ahead of their journey, and only two bicycles can be transported on a train at one time. These severe restrictions need to be overcome as they are deterring people from using this method of public transport.

The increased use of water taxis and other such vessels is an opportunity that should also be explored further as a practical, but enjoyable method of visitor travel within the National Park, which would also reduce the flow and environment impact of motorised vehicles.

B18: Visitor Hubs— Ensuring investment in visitor hubs at, or linking to, Balloch, Callander and Arrochar/Tarbet will enable more sustainable ways to travel both to and within the National Park including links to improved active travel networks. Work with destination businesses and public bodies at Arrochar and Tarbet to maximise connectivity between road, rail, active travel and water access.

Integrating and improving the public transport network to reduce the volume and impact of private vehicles within the National Park needs to be considered a priority due to the lead-in time from concept to delivery. If arriving by train, onward links to other areas of the National Park should be integrated as part of the public transport network.

The increased use of water taxis and other such vessels is an opportunity that should also be explored further as a practical, but enjoyable method of visitor travel within the National Park, which would also reduce the flow and environmental impact of motorised vehicles.

It is important that longer-term projected improvements to active and/or low emissions transport provision within the park, and the integration of the park's public transport network, do not simply become a panacea or distraction from the immediate effort which is required to better manage cars within the park, which is itself an urgent and pressing concern for all who live in, work in or visit the park.

B19: Visitor Hubs— Ensuring investment in visitor hubs at, or linking to, Balloch, Callander and Arrochar/Tarbet will enable more sustainable ways to travel both to and within the National Park including links to improved active travel networks. Develop a location in Callander to be the hub for sustainable travel into the wider Trossachs area.

Such a facility in Callander would be welcome if it can be established that existing and anticipated visitor statistics would make this a worthwhile and economically viable facility. An independent feasibility study would be strongly recommended as part of any initial assessment.

B20: Recreational Path Network Investment in the National Park's recreational path network will focus on keeping the existing network and statutory core paths in good condition and developing more sustainable models to resource path maintenance. Develop model for the sustainable management and promotion of the West Highland Way.

Estimates from the West Highland Way (WHW) web site suggest that over 40,000 walkers complete the entire route each year, with a further 100,000 completing just some of the sections. Such footfall is not considered heavy in comparison to other routes and areas of the UK, but the more severe weather conditions experienced along the route of the WHW will more severely impact upon the rates of erosion.

With this factor in mind, we would support the development of a model that will reduce the rate of erosion, and consequential path maintenance, whilst always remembering that the surfaces and any ancillary constructions must also be appropriate for the natural environment and aesthetic of the area.

B21: Recreational Path Network— Investment in the National Park's recreational path network will focus on keeping the existing network and statutory core paths in good condition and developing more sustainable models to resource path maintenance. Develop a maintenance programme for the most heavily used stretches of the core path network, informed by a path condition monitoring framework supported by volunteers.

The investment, construction and maintenance considerations of such heavily used stretches of the core path network should follow those as suggested for the West Highland Way, in that we would support the development of a model that will reduce the rate of erosion, and consequential path maintenance, whilst always remembering that the surfaces and any ancillary constructions must also be appropriate for the natural environment and aesthetic of the area.

Well maintained paths with good facilities, will also encourage visitors to stick to those paths and reduce damage to other areas or disturbance of wildlife.

B22: Water Recreation— Investment in maintaining and where appropriate expanding facilities for enjoying water recreation and the safe enjoyment of busier lochs. Invest in existing pier and pontoon infrastructure on Loch Lomond to enable leisure journeys and growing water transport services.

Such investment in the pier and pontoon infrastructure on Loch Lomond should be supported, particularly to support any growth in the availability of water taxi services or similar that will reduce road transport. However, the recurring and high-risk activities of some visitors regularly jumping from such structures, and also operating set-skis within the exclusion zones close to the piers and pontoons, must be tackled with increased rigour if accidents are to be avoided.

B23: Partnership Approach to Visitor Management— To ensure a strong partnership approach to co-ordinating all public bodies with a role in supporting the safe and responsible enjoyment of the National Park. Jointly plan visitor management with partners to ensure a co-ordinated approach to staff presence on the ground, litter management, visitor information campaigns and operation of publicly managed visitor facilities.

The creation of a partnership visitor management plan (VMP) must include the input and considerations from landowners and managers if its support and delivery are to be successful. Importantly, the VMP must be deliverable, rather than aspirational if it is to gain wide support and remain effective with its aims and objectives.

B24: Partnership Approach to Visitor Management— To ensure a strong partnership approach to co-ordinating all public bodies with a role in supporting the safe and responsible enjoyment of the National Park. Further develop the volunteer ranger programme to support and supplement the work of the professional Ranger service and engage with our visitors.

Volunteer Ranger opportunities across Scotland not only deliver their support for practical activities, but participants can also be ambassadors both within their role and externally. Such a programmes within the LLTNP have worked successfully in the past and should be expanded where practical.

The 'Make Your Mark' volunteering scheme aims to increase the number and diversity of conservation and heritage volunteers in Scotland, not only at a practical level, but also by utilising their knowledge and skills for behind-the-scenes roles such as administration, accountancy, education, planning and more. Horizon scanning research undertaken by Visit Scotland highlights the projected increase in 'Workcations' and 'Voluntourism' as a way for people to step away from their everyday lives, improve their own wellbeing and contribute to worthwhile projects; an opportunity that LLTNP should be open to exploring.

B25: Byelaws— National Park Camping and Loch Lomond Byelaws will be kept under review and amended as necessary where a regulatory response is needed to address issues of concern arising from changing recreational demand and behaviours. If approved by Scottish Ministers, implement changes to the Loch Lomond Byelaws to ensure safe recreational experiences at busy locations, reducing conflicts between power and non-powered activities.

We have considered and fed back to the 2022/3 Loch Lomond Byelaws consultation with regard to reviewing and updating LLTNP operational process that will more robustly ensure safe recreational experiences at busy locations and reduce conflicts between power and non-powered activities.

There are also some seasonal situations where bylaws could be used to minimise risk, such as lighting fires at times of high wildfire risk.

B26: Byelaws— National Park Camping and Loch Lomond Byelaws will be kept under review and amended as necessary where a regulatory response is needed to address issues of concern arising from changing recreational demand and behaviours. Review the Loch Lomond & The Trossachs Camping Management Byelaws to continue to provide a high quality camping experience in the Camping Management Zones.

We have considered and fed back to the 2022/3 Loch Lomond Camping Management Byelaws consultation with recommendations that will continue to provide a high-quality camping experience in the Camping Management Zones. Within this, we have included proposals to severely restrict the use of open fires, fire bowls and disposable barbecues at all locations, with the exception of sites that are designed for their use.

As the popularity of camping, motorhomes and rooftop camping continues to increase, the provision of additional designated sites is likely to be required. Assessments and permissions for suitable locations should be considered at the earliest opportunity in order that any necessary measures can be enacted with both consideration and efficacy.

**B27: Promoting Visitor Safety—** A co-ordinated approach will be taken across responsible bodies to ensure the safe enjoyment of publicly managed and other popular visitor sites. Take a consistent approach to the provision of signage, public rescue equipment, and visitor information campaigns across all responsible public bodies to raise awareness of public safety issues and potential hazards in the outdoors, particularly in relation to water safety.

Consistency of terminology and messaging for visitors that emanates from the LLTNP and all partners is important if confusion and misunderstandings are to be avoided.

Whilst every visitor has an obligation to ensure their personal safety, and also those for whom they are responsible, there remains an obligation of LLTNP and their partners to take adequate measures which will reduce the risk of injury.

In particular this extends to locations where hazards may not immediately be obvious such as cold water and features below the surface.

Third parties who are operating water based recreational activities should, as a minimum, be required to annually provide LLTNP with a copy of their health and safety documentation, emergency action plan and appropriate certificates.

**B28: Whole System Approach—** A 'whole system approach' has been taken and a range of new public transport services are provided which are targeted at popular outdoor leisure journeys, reducing transport emissions and promoting inclusion. Develop a governance model in collaboration with responsible transport authorities and agencies which enables a National Park wide approach to rural transport planning.

Any strategy that is targeted at "popular" factors is not likely to be future proofed. What is popular today may be less popular in 5 years' time.

There is a need to apply a whole system approach to incorporate less popular destinations within the park so that visitors can be dispersed more easily and also service the local residents that are less likely to live in the hot-spots because they have been outpriced by second home owners and holiday lets.

Any governance model must also consider the local residents' needs.

Any governance model should be developed in collaboration with strategic partners, including land managers, and not limited to transport authorities and agencies who may themselves have agendas which might not align with those whose business and homes are

within the LLTNP. Such wider collaboration will also help to build and strengthen ownership of such an approach.

B29: Whole System Approach - A 'whole system approach' has been taken and a range of new public transport services are provided which are targeted at popular outdoor leisure journeys, reducing transport emissions and promoting inclusion. Develop new targeted seasonal transport services that provide a viable and attractive alternative to the private car to access popular National Park destinations.

Rural areas have all suffered from a degradation of transport infrastructure, and particularly public transport options.

It is important that local residents, who have to adapt to accommodate the influx of visitors at popular times, are supported on a year-round basis.

Infrastructure should be adaptable to cope in busy times, but it is important that residents who must travel outside the park to work out of season, are able to do so without reliance on the car.

The demographic data supplied by the National Records of Scotland shows that Argyll and Bute is suffering a massive decline in the key working population (25-44), with Stirlingshire also showing a decline although less severe (albeit this statistic is likely to be distorted favourably by the City of Stirling).

This has an impact on schools which have declining school rolls. This demographic is important to the national park as it will impact associated employment and volunteering opportunities.

It must be easier for this demographic to live in and around the national park and providing transport solutions for locals is key to that so that working and school journeys can be easier and also be low carbon.

B30: Whole System Approach— A 'whole system approach' has been taken and a range of new public transport services are provided which are targeted at popular outdoor leisure journeys, reducing transport emissions and promoting inclusion. Gather data which demonstrates the latent demand for rural travel to inform service planning.

Given the lack of transport infrastructure serving much of the national park, the data gathering must take account of the fact that most of the "popular" destinations are popular because they are easy to reach by car. Therefore, many visitors will have discovered only a limited area of the national park.

Care needs to be taken that the data gathering takes account of the possibilities as visitors are able to discover other locations within the national park so that future transport infrastructure facilitates a better dispersal of visitors.

Better dispersal will also take pressure of certain over used areas in the park and so recovery will be swifter.

The local resident population's habits and needs so that routes serve working and school hours. The transport infrastructure should be a year-round service.

B31: Whole System Approach— A ‘whole system approach’ has been taken and a range of new public transport services are provided which are targeted at popular outdoor leisure journeys, reducing transport emissions and promoting inclusion. Develop and deliver an active travel strategy that links up services and infrastructure as key parts of an integrated, connected multi-modal transport experience of the National Park.

Carbon neutral transport needs to be adaptable and agile. Timetables and routes should also serve the local residents and those employed in the national park as a primary objective, hand in hand with facilitating the objective of incentivising visitors to use carbon neutral options through ease of use.

It is notable that the National Park Journey Planner does not give a bike option for travel to the LLTNP, especially when there are options to take buses on both the West Highland Line and CityLink, albeit the bus option is very restricted.

For the bus to be a viable add on for cyclists, buses need to be able to carry more bikes on more routes, which will invariably involve amending legislative restrictions. Currently Citylink allow only 2 bikes per bus on those buses that are bike friendly routes – this is no good for a family or group activity, leaving car travel as the only option.

Now that it is up and running the Highland Explorer train needs to become a standard feature so that booking can be made at shorter notice. Part of the barriers to use the Highland Explorer services is that cycle reservations must be made at least two hours before travel. This can have consequences for a return trip.

The east side of the park poses harder challenges given the lack of an existing railway and more limited bus routes. This means that any visitor travelling from the east of Scotland has little option but to travel by car.

Better transport connectivity will also reduce travel times which will also help encourage visitors to use alternative travel options to the car.

B32: Incentivising Sustainable Travel Choices— Sustainable travel choices have been incentivised and enhanced through responsible public bodies collaborating on the operation and pricing of transport services, travel hubs and parking facilities. Develop a strategic approach to setting pricing levels for travel and parking which will incentivise and support low carbon travel choices where alternative transport services are in place.

The pricing levels at a high level designed to dissuade visitors from travelling by car can have the unintended consequence of illegal or irresponsible parking outwith designated car parks. Attractive pricing of public transport will help, but only if it is worthwhile.

For example, if a public transport journey takes twice as long, or does not go directly to the chosen destination, the visitor will undoubtedly be prepared to pay more to drive and park because of the opportunity cost.

B29: Incentivising Sustainable Travel Choices— Sustainable travel choices have been incentivised and enhanced through responsible public bodies collaborating on the operation and pricing of transport services, travel hubs and parking facilities. Develop a network focused on mass transit corridors and journey demand including journeys to the National Park from nearby urban areas.

A network that focuses on mass transit corridors will do little to ease pressure on the villages that are already strained by visitor numbers in the high summer.

Improved public transport will only partly displace car transport and will bring in more visitors who would otherwise not have been able to visit due to lack of options.

Working with local landowners to creating focal points with good access to encourage visitors away from the traditional hot-spots will be important to reduce this pressure.

**B30: Incentivising Sustainable Travel Choices—** Sustainable travel choices have been incentivised and enhanced through responsible public bodies collaborating on the operation and pricing of transport services, travel hubs and parking facilities. Work with operators to develop an improved, integrated and affordable Waterbus service network on Loch Lomond and Loch Katrine.

The waterbus option should be fully explored but the carbon credentials of these boats should also be considered. The River Taxi on the Thames is used on the same Oyster card system as the tube and bus and is priced accordingly.

Currently the Waterbus is not a transport option, but a water-based experience and pricing is at “tourist” level and therefore not an option for many.

**B31: Policy for Connecting Everyone with Nature Experiences.** Enabling and encouraging more underrepresented and protected groups to enjoy the National Park.

Inner city locations schools and educational establishments in such locations should be encouraged to visit to take part in specifically planned events.

If sponsorship could be sought from businesses such as SSEN who are working in the park costs such as transport could be covered which would help with take up.

**B32: Policy for Connecting Everyone with Nature Experiences.** Ensure improved communication about the National Park into networks used by underrepresented audiences including to improve representation and participation in policy and decision making and to improve diversity generally in the work of the National Park Authority.

It is important that diversity is considered. The shortage of housing in the national park area will add to the challenge of attracting a broader workforce.

LLTNPA must work with local landowners and support housing initiatives so that the local economy is not held back by the lack of homes for people who work in the park.

**B33: Policy for Connecting Everyone with Nature Experiences.** Ensuring that investment and visitor sites and infrastructure takes account of the accessibility needs of all abilities and cultures.

Inclusive and accessible experiences for all should be at the heart of the National Park’s visitor experience policy and strategy.

Although there will be some practical limitations due to the natural features, responsible access should be a priority consideration when planning and developing infrastructure projects.

The LLTNPA have the opportunity to lead such a vision for both economic and social good by working with partners to create and develop initiatives that will benefit not only visitors, but also the communities, businesses and partners that operate within the National Park.

As Scotland continues to evolve as a multi-cultural country, LLTNPA also has the opportunity to both celebrate and learn from this diversity as a force for economic and social good.

B34: Policy for Connecting Everyone with Nature Experiences. Encouraging local tourism and recreation businesses to improve accessibility in providing visitor offerings.

Approximately 20% of Scotland's population identify themselves as disabled, many of whom find independent travel and access to the outdoors and tourism business challenging.

Accessible and inclusive tourism has been highlighted by Visit Scotland as a priority and this has been recognised by the creation of a 'toolkit' for recreation providers and local businesses.

Joined up travel systems need to be improved, for example Network Rail offer additional access support at Balloch station if booked more than 2 hours ahead of arrival, but it appears there are no accessible taxis available from the location.

Whilst there are legal requirements for access in some sectors, these do not always extend to outdoors areas, but should still be part of the National Park's thinking.

The LLTNP may wish to consider the requirement for an Access for All assessment to be carried out at each of their primary visitor locations and encourage other venues and business to do the same with grant funding being available.

B35: Policy for Connecting Everyone with Nature Experiences. Ensuring that more young people enjoy the outdoor experience in the National Park and are inspired to care more for nature and the climate.

At times it appears as though outdoor learning and experiences have been removed from Scotland's educational curriculum. There are various reasons for this, financial, logistical, complexity, personal risk etc but regardless, we need to get far more children into the countryside to support their education and wellbeing.

Crown Estate Scotland at Glenlivet Estate collaborated with the Wilderness Foundation to bring 6-11 year olds (with teachers and supervisors) from urban areas to the countryside for 4 nights under canvas. Some had previously never even been to an urban park. They got muddy, fell over, some cried a bit, but they (nearly) all left as very different and confident mature people in their own right and many returned with their parents during school holidays.

This level of appreciation and understanding helps to guide young people in their future lives and is something they will hopefully pass on to others. It also gives them confidence that they understand responsible access and what they can and should do when enjoying rural Scotland. This policy item should be a priority for partnerships, where SLE members would be interested in helping to deliver.

B36: Policy for Investing in Sustainable Visitor Experiences. Supporting Sustainable Development— people and place, promoting a high-quality landscape experience through

design excellence, for both visitors and communities, to enhance place quality and the landscape qualities of the National Park.

From concept, to design, to planning, to delivery, the sense and significance of place which benefits and enhances the National Park are important considerations that must not be diluted. For people who have sensory loss such as sight or hearing, measures should be in place to support their enjoyment and appreciation of the National Park.

Communities should feel they are more than just residents and business owners, but through collaboration, transparency and understanding from all parties, they are the custodians and ambassadors for the National Park.

B37: Policy for Investing in Sustainable Visitor Experiences. Supporting inclusion and improved accessibility to the National Park by identifying and facilitating actions that support equality and diversity to secure barrier free / inclusive access that meets the needs of all users

The varied terrain of the National Park will influence the levels of inclusion and activity that are able to take place. However, for all design and construction situations an access appraisal and assessment should be undertaken to identify what opportunities for improving inclusion and access might exist.

In some areas, regular sign language tours and experiences are in place and operated in conjunction with charitable organisations.

The LLTNP should be an enabler and barrier free to all those who wish to experience the outdoors in their own responsible way.

B38: Policy for Investing in Sustainable Visitor Experiences. Supporting Sustainable Development – climate and nature, leading a naturebased approach to design which addresses the climate and biodiversity crises using the principles of both Future Nature and Mission Zero, protecting and enhancing biodiversity, and capitalising on the benefits of nature and considering sustainability of design, materials, maintenance, and use.

From the colour of signposts, to the construction materials and orientation of a building, or even the layout of a car park, all should provide an opportunity to showcase initiatives and projects that are already in place, and in ways that will complement and enhance, rather than detract, from the National Park and its landscape in the future.

B39: Policy for Investing in Sustainable Visitor Experiences. Supporting more sustainable ways of travel both to and within the National Park (Modal Shift) strengthening service support through a network of integrated hubs; walking, cycling, accommodation of electric vehicle (EV) use, and public and shared transport and the facilities required to increase uptake and address private car use increases.

For several years, Scotland has been at the forefront of responsible tourism research. Some of these initiatives have been nationally and locally focused, however the learnings from these studies have not always been translated into actions.

As visitor numbers increase towards (if not already exceeding) pre-Covid levels, the LLTNP have the opportunity to become an exemplar in this field. The National Park's comparatively close proximity to some of the largest areas of conurbation and population offer considerable

opportunities for increased tourism visits during what are normally considered the shoulder-months in the tourism sector.

By increasing and incentivising the appeal of road and rail low carbon public transport, the National Park and associated businesses have the opportunity to influence visitor attitudes and behaviour.

'Green Vehicle' zones, similar to those seen in urban areas, could be introduced where practical to incentivise the use of low carbon travel, together with low emission shuttle buses taking visitor to primary visit locations.

B40: Policy for Investing in Sustainable Visitor Experiences. Supporting visitor management and dispersal, creating a flow of people to our more resilient places, and using good design, information and better provision to support more responsible behaviours, whilst reducing the need for visitor management operations and continuing a collective approach to ensure effective long-term stewardship of our sites.

Good communications and information targeting visitors ahead of their visit to explain what constitutes responsible behaviour will be an essential factor in the success of any such restrictions. All messaging should be clear, consistent and where possible, enforceable.

Vehicle exclusion zones could be introduced across more sensitive locations (based upon both community and natural environment), together with greater restrictions on motorhome and caravan numbers whose owners would need to pre-book for designated locations and more resilient areas.

All open fires and disposable barbecues (be they on the ground or in fire bowls etc.) should not be permitted, except in clearly designated areas where safe disposal facilities are available.

At some seasonal hot-spot locations, organisations such as the National Trust in England are contributing financially to the cost of having a dedicated police officer on duty who works in direct collaboration with the Rangers. This presence has been shown to reduce anti-social behaviour and confrontational incidents, lessen the impact on sensitive sites, has been calculated to be almost cost neutral in comparison to Ranger only operations, and also reassures well behaved visitors.

C1: Transition to a greener economy— The National Park economy is transitioning to a greener, zerocarbon wellbeing economy in ways that are fair and inclusive to everyone and where the benefits arising from this are retained and shared locally. Establish a robust evidence base to identify where there are existing skills or labour shortages along with opportunities and demand for new green skills and jobs growth.

Data collection and the creation of an evidence base will be very important for the transition to a greener economy and wider park plan.

Members have identified specific areas of the local economy where a skills and labour shortage are apparent – for example, trades such as electricians and plumbers, which can be considered ‘green jobs’ as they are vital for the installation of renewable energy devices such as solar panels, air source heating etc. It is important not to lose sight of existing or traditional skills and associated labour shortages, whilst focusing on opportunities and demand for new green skills and jobs growth.

C2: Transition to a greener economy - The National Park economy is transitioning to a greener, zerocarbon wellbeing economy in ways that are fair and inclusive to everyone and where the benefits arising from this are retained and shared locally. Develop a Green Skills and Just Transition Action Plan for the National Park to ensure the benefits arising from economic transition are shared in a fair and inclusive way.

At a National Level we think a Land and Agriculture Just Transition Training Fund is needed (along the lines of the Woman in Agriculture and Woman in Forestry) in order to meet the demand for upskilling and to help land managers take full advantage of emerging business opportunities. This should be supported by a diverse steering group to ensure effective delivery and monitoring. Its focus should be to support land- based businesses of all sizes (but in particular SMEs) to access training in priority areas such as:

1. Climate and Nature Literacy
2. Integrated Land Management Planning
3. Green finance and responsible investment in Natural Capital
4. Sustainable soil management
5. Establishing environmental baseline measures
6. Carbon and nutrient budgeting

The park could develop a similar approach to its Green Skills and Just Transition Action Plan. This plan should then be linked to a larger community engagement piece to identify specific gaps and priorities in the park area.

C3: Transition to a greener economy - The National Park economy is transitioning to a greener, zerocarbon wellbeing economy in ways that are fair and inclusive to everyone and where the benefits arising from this are retained and shared locally. Support closer working between the public sector, land managers, businesses and communities to grow the green economy, including opportunities for new business models, collaborative pilots and community led social enterprise that will help build and retain local economic wealth and grow the local workforce.

Community training and learning programmes should include education about how Government policy priorities can influence land use decision making, as well as managing expectations about what land use decisions communities can realistically expect to influence.

The community empowerment rhetoric emerging from Scottish Government and its agencies – while important – may also be contributing to unrealistic expectations about what communities expect to see happen when they object or want to influence a project. Forestry particularly in the South of Scotland, is a very live example.

C4: Low Carbon businesses - Businesses are reducing their carbon emissions from a shift to greener and more local supply chains, renewable energy use, more sustainable waste management, and greener forms of transport. Identify the support needs of existing businesses (including land and tourism) to help them transition to net zero, including specialist technical advice and identification of opportunities for collaborative support and action.

SLE is aware of the Scottish Government developing various initiatives with education providers the local colleges. However, at a local level many of the service providing businesses are already too busy with work associated with existing technologies.

Greater emphasis should be put on incentivising businesses to expand into new technologies. There is a severe scarcity of renewable energy specialists in rural locations and the existing businesses struggle to recruit new employees.

C5: Low Carbon businesses - Businesses are reducing their carbon emissions from a shift to greener and more local supply chains, renewable energy use, more sustainable waste management, and greener forms of transport. Seek the expansion of specialist business support and funding to facilitate carbon reduction.

Many small businesses are keen to make these changes but require some basic support in understanding how to do this. Guidance and advice for them would be welcome.

C6: Low Carbon businesses - Businesses are reducing their carbon emissions from a shift to greener and more local supply chains, renewable energy use, more sustainable waste management, and greener forms of transport. Continue to support improvements to digital and telecommunications infrastructure to facilitate improvements in business operations and minimize the need for travel where appropriate.

As above, we are broadly supportive of this objective.

C7: Low Carbon businesses - Businesses are reducing their carbon emissions from a shift to greener and more local supply chains, renewable energy use, more sustainable waste management, and greener forms of transport. Support collaboration between tourism businesses, communities and public sector partners on improved public transport solutions for employees and visitors.

As above, and with reference to multiple responses in Section B, we are broadly supportive of this objective.

C8: A wellbeing economy - National Park communities are fully harnessing the opportunities arising from economic transition, seeing an increase in working age population through take up of new green jobs and experiencing a range of benefits from investment in natural capital within their local landscape. Through the National Park Authority's planning role and working with housing partners, ensure new housing more closely corresponds to identified requirements of communities and the local labour force.

Many of our members are ready and willing to increase their contributions to the Wellbeing Economy by offering work opportunities, but many are reporting skills shortages that prevent this from happening. Housing does have an important role to play here so we support this approach.

We encourage the National Park Authority to work with landowners in their efforts to upgrade properties so that homes are not sold outwith the local community and are protected for the local labour force.

C9: A wellbeing economy - National Park communities are fully harnessing the opportunities arising from economic transition, seeing an increase in working age population through take up of new green jobs and experiencing a range of benefits from investment in natural capital within their local landscape. Update a framework of support for communities to fully realise the potential opportunities arising from transition to net zero through increased capacity building support, training and skills development for community anchor organisations.

This should align with existing plans and frameworks for rural and green jobs and skills, including NatureScot's *Nature-based jobs and skills Action Plan 2023-2024* (and beyond).

Run by Scotland's Regional Moorland Group, Estates that Educate is also an invaluable programme that allows school age children to learn first-hand about life, careers and skills in rural Scotland.

It has a positive impact on local communities and businesses and also benefits the conservation of rare species and heather moorlands.

The program also works in tandem with the Pathways to Rural Workforce alongside Countryside Learning Scotland.

These programmes have huge potential to bolster this approach from the National Park and we would strongly encourage that they be included in any frameworks or approaches to skills development in the Park.

C10: A wellbeing economy - National Park communities are fully harnessing the opportunities arising from economic transition, seeing an increase in working age population through take up of new green jobs and experiencing a range of benefits from investment in natural capital within their local landscape. Through learning programmes, training and events, support communities to understand how they can engage in and help inform land use decisions and investment in natural capital that can help address identified local community needs.

Community training and learning programmes should include education about how Government policy priorities can influence land use decision making, as well as managing expectations about what land use decisions communities can realistically expect to influence.

The community empowerment rhetoric emerging from Scottish Government and its agencies – while important – may also be contributing to unrealistic expectations about what communities expect to see happen when they object or want to influence a project. Forestry particularly in the South of Scotland, is a very live example.

The Scottish Land Commission's *Rural Land Market Insights Report 2022 (2023)* notes that ambitious Scottish Government tree planting targets are a major contributor to the booming forestry industry and the increase in land values for plantable land, which is often resisted by rural communities.

Equally, in their community engagement efforts, many of our landowning and professional forestry members who are trying to deliver against these targets are having efforts frustrated by a handful of community members who object to location or species of planting. These people do not necessarily represent the silent majority who are either in support of or indifferent to the creation of new woodland in their area.

We have therefore highlighted a disconnect between clear government support for the forestry industry (or indeed any other forms of land use that contribute to various goals such as nature restoration), and community understanding and acceptance of this.

We therefore are making calls on Government agencies to be part of the solution in managing communities' expectations in instances such as this and believe this should be embedded into the National Park Plan too. With clear reference to both local and national priorities.

Equally, as a sector we are working with other bodies and sectors to identify how community benefits can successfully be embedded into natural capital projects and markets. The work is very much in the early stages and many limitations have already been identified, but many investors and landowners are already exploring how they can deliver this through their own activities too.

C11: Inclusion and learning opportunities - More people within our communities are contributing to supporting a greener rural economy through increased learning, skills and volunteering opportunities. Refresh the National Park Authority- led volunteering programme in the Park, particularly to welcome new volunteers from our communities.

This is something our members in the Park could offer, supported by our Regional Manager. Those already offering employment and volunteering opportunities are also well placed to share good practice with other landowners and businesses.

C12: Inclusion and learning opportunities - More people within our communities are contributing to supporting a greener rural economy through increased learning, skills and volunteering opportunities.

**Design a whole volunteering pathway, providing opportunities to gain green skills, from youth programmes through to adult volunteering, skills sharing and beyond to employment.**

We support any efforts to increase the awareness of green and rural skills and get more people, especially young people, into rural jobs.

Many of our members are reporting a shortage in the skills they need to run a successful rural business and offer opportunities to people in rural areas.

We would like to see the LLTNP work with landowners in the area to identify these learning and volunteering opportunities, supported by relevant educational institutions.

C13: Inclusion and learning opportunities - More people within our communities are contributing to supporting a greener rural economy through increased learning, skills and volunteering opportunities. Support young people to see their future in the National Park through development of traineeships, apprenticeships and placements that provide wide-scoping opportunities for green skills development and pathways into green jobs and careers.

There are numerous examples of land managers engaging in this type of activity, such as those run by Scotland's Regional Moorland Group – Estates that Educate is also an invaluable programme that allows school age children to learn first-hand about life, careers and skills in rural Scotland.

C14: Inclusion and learning opportunities - More people within our communities are contributing to supporting a greener rural economy through increased learning, skills and volunteering opportunities. Continue to grow the National Park Authority Youth Committee as a platform for young people from a wide range of backgrounds to engage with the National Park, be involved in decision making and advocate for their sustainable future.

No specific comments, but broadly supportive of this objective.

C15: Low carbon local living - People living within the National Park are reducing their carbon emissions through both individual and community-led action to support the transition to net zero and more local living Through the roll out of collaborative initiatives (such as the Scottish Government-led Community Climate Action Hub network), support communities to collaborate and lead more on climate action.

There is widespread concern in rural communities around heating of homes, with widely reported changes coming in the type of heating which will be allowed in future. This is concerning as in many rural areas there is not the infrastructure or economic viability to make this an option. Therefore, help with this and the Park playing a role of demonstrating best practice and how it can be done, would be welcomed.

C16: Low carbon local living - People living within the National Park are reducing their carbon emissions through both individual and community-led action to support the transition to net zero and more local **living Support Councils' work on rolling out Local Food Growing strategies and Local Heat and Energy Efficiency strategies.**

As per C15

C17: Low carbon local living - People living within the National Park are reducing their carbon emissions through both individual and community-led action to support the transition to net zero and more local living. Support improved opportunities to live more locally through taking a local place-based partnership approach towards service delivery, including supporting the retention of local services and facilities, public transport, alongside innovative new approaches towards rural service provision, including through digital and online opportunities.

No specific comments, but broadly supportive of this objective.

C18: Low carbon local living - People living within the National Park are reducing their carbon emissions through both individual and community-led action to support the transition

to net zero and more local living Support opportunities to re-purpose and for multi-use of existing facilities including halls, local business hubs and valued heritage assets within communities.

No specific comments, but broadly supportive of this objective.

C19: Increasing resilience to the changing climate - Communities are climate-ready, having developed increased awareness and understanding of the impacts of climate change on health, buildings, local infrastructure, businesses and the surrounding natural environment and identified how to adapt and build resilience to living with a changing climate. Support communities to identify ways in which they can take action on climate mitigation and climate adaptation, including consideration of how investment in natural capital can help support increased local resilience, particularly in relation to flooding, through local resilience plans, Local Place Plans, the new Local Development Plan and proposed Regional Land Use Partnership.

Adding to this, we would encourage the inclusion of education about what local landowners are capable of and are doing in relation to climate resilience.

C20: Addressing housing needs - Housing within the National Park better meets the needs of young and working-age people who want to work and live in the National Park, directly supporting the rural economy and vibrant rural communities. Through the new Local Development Plan, ensure that new housing responds to meeting local housing needs of both communities and the rural economy through a continued focus on affordable housing provision and securing delivery of a broader range of housing types and tenures.

We support any housing policy that will ensure the national park has thriving and sustainable communities. The housing needs of the population are changing alongside the demographic. There are more single households and older households which is putting greater demand on existing stock. The national park must be progressive and ensure that new housing is built to suit the changing demographics, and in locations that are supported by transport infrastructure and services such as schools and care. We are concerned that the implementation of NPF4 will inhibit urgent and necessary housing developments so the National Park Authority must take a proactive role to ensure that housing needs are suitably addressed and any teething issues with the implementation of NPF4 are not allowed to delay the roll out of plans.

C21: Addressing housing needs - Housing within the National Park better meets the needs of young and working-age people who want to work and live in the National Park, directly supporting the rural economy and vibrant rural communities. "Through the new Local Development Plan, stem the further loss of housing to holiday lets and second homes through consideration of interventions including a new requirement for all new homes to be for permanent occupation only and the merits of applying for Short Term Let Control Areas within certain areas of the National Park."

We agree that new housing should be protected for the local community where appropriate using devices such as the Rural Housing Burden so that the workforce can live in the area

that they work. However, it is important that housing is located where communities want to live, and it should fit with the National Park's sustainable transport policy.

Therefore, we would support a test of appropriateness to be applied to properties that are perhaps better suited to the holiday market. Accordingly, if there was a Short Term Let Control Area, it should take account of:

- Location and proximity to services. The policy must fit with sustainable transport policy so restricted properties should only be in areas that have, for example, regular year-round transport links that workers can rely upon, schooling for children, care in the community etc.
- Size and type of property. Many properties such as larger farmhouses or country houses are not suitable for the local rental market but make good holiday letting properties.

A further matter is where the cost of renovation to meet government requirements on energy efficiency and repair makes it commercially unviable to carry out works and rent a property on a private rental tenancy due to the extended payback period. To put this in context, renovations of traditional stone cottages often exceed £100k. It is therefore important that a test of appropriateness also considers the financial burden expected to be carried by landowners and suitable grant support offered as compensation for the restriction.

C22: Addressing housing needs - Housing within the National Park better meets the needs of young and working-age people who want to work and live in the National Park, directly supporting the rural economy and vibrant rural communities. "Support delivery of a minimum of 30 new homes per year. Through the preparation of the new Local Development Plan, consider whether this minimum requirement needs to be increased, informed by Local Place Plans, aligned to investment for nature and climate and where additional housing can support some of the more remote rural communities in the National Park. "

We support a well-considered plan that works with the communities and landowners to identify the best locations that fit with the work and living needs of the future occupants.

C23: Rural transport and active travel - People living and working in the National Park are less reliant on car-based travel through improvements to rural transport provision and active travel links within and between communities in and around the National Park. Support communities to identify improvements to rural transport options through collaboration with public/private sector to establish innovative solutions or new social enterprise opportunities.

No specific comments, but broadly supportive of this objective.

C24: Rural transport and active travel - People living and working in the National Park are less reliant on car-based travel through improvements to rural transport provision and active travel links within and between communities in and around the National Park. Establish active travel opportunities within and between communities to help more people meet their everyday needs by walking, cycling or wheeling as well as support health and wellbeing outcomes.

No specific comments, but broadly supportive of this objective

C25: Community influence and place making - Communities are empowered to exert more influence and control over changes in and around the places where they live, delivering a

range of outcomes that support local living and strengthening connections between people, land, nature, culture and heritage. Establish an updated framework from public and third sector organisations to provide increased support to communities to build and maintain capacity within their local organisations and to increase levels of confidence and knowledge to engage in decisions around improving local. This could be through networking, learning and skills development to provision of dedicated development support to assist with project identification, securing funding and delivery.

Please see C26 response.

C26: Community influence and place making - Communities are empowered to exert more influence and control over changes in and around the places where they live, delivering a range of outcomes that support local living and strengthening connections between people, land, nature, culture and heritage. Support to communities to care for heritage assets, where possible linked to opportunities for re-use, social enterprise and job creation.

Any community empowerment messaging must be delivered alongside educational content that equips communities and individuals with an understanding of the realities of land ownership and management, and how this is largely driven by Government policy and nature targets. Too often we are seeing community empowerment messaging do its job and empowering communities to want to make change and exert influence, but often over projects or land management activities that cannot realistically be significantly influenced. For example, individuals in an area may object to new woodland creation, despite this being in the public interest due to Scottish Government tree planting targets.

Regarding heritage assets, it would be helpful to understand specific strategies for specific types of assets and their current ownership models e.g. does this strategy refer to publicly owned heritage assets, or working with private owners to enable community use and care for the assets?

C27: Identifying development needs and opportunities - New development and infrastructure is delivered in an integrated way with investment in nature and carbon, helping to unlock the value of natural capital where possible and respond to locally identified needs and opportunities. Prepare a revised development strategy in the new Local Development Plan with a focus on development and infrastructure requirements to support nature, climate, low carbon rural living and community wealth building outcomes.

We support this, and would emphasise the need for early engagement with landowners in the Park so the Authority can learn: firstly what they have to offer in the way of development opportunities; and also what challenges they face with the planning system or other frameworks that may prevent the realisation of these new opportunities.

C28: Identifying development needs and opportunities - New development and infrastructure is delivered in an integrated way with investment in nature and carbon, helping to unlock the value of natural capital where possible and respond to locally identified needs and opportunities. Through the new Local Development Plan, expand the coverage of area-based land use and development planning investment strategies in partnership with landowners, communities, businesses and public agencies, integrated, if possible, with the development of a Regional Land Use Framework for the National Park.

We support any efforts to deliver integrated land use and our members in the Park are well placed to continue delivering against this objective. We are broadly supportive of RLUPs, providing they are resourced and governed effectively and take into account the expertise and priorities of landowners as well as public and community needs and aspirations. This will help ensure balanced land use and hopefully provide a forum for communities and landowners to understand each other's needs and expertise.

C29: Identifying development needs and opportunities - New development and infrastructure is delivered in an integrated way with investment in nature and carbon, helping to unlock the value of natural capital where possible and respond to locally identified needs and opportunities. Support the delivery of nationally strategic infrastructure development identified by National Planning Framework 4 by ensuring these are designed and delivered in ways that are sensitive to the National Park's special environmental and landscape qualities and maximise benefits to local communities, businesses and visitors.

We support this approach and want to emphasise the importance of delivering the new development and infrastructure in a way that supports land-based businesses.

Recently we have been seeing instances of small land-based businesses being refused planning permission for new tourism offerings, such as a small holiday let, because of a lack of the required infrastructure. In one particular case a lack of public transport or active travel connections was cited as reason for refusal of a small holiday let on a farm (not in the National Park). This is obviously outwith the farmer's control, yet the holiday let is crucial to business diversification, which is needed now more than ever for small businesses, especially agricultural businesses. This aligns with our position on the need for flexibility in allowing rural development (of all kinds) despite lack of these provisions, as it is inevitable that businesses and families in rural areas will need to travel to and from their destinations by private car the majority of the time.

C30: Identifying development needs and opportunities - New development and infrastructure is delivered in an integrated way with investment in nature and carbon, helping to unlock the value of natural capital where possible and respond to locally identified needs and opportunities. Support the delivery of the strategic development needed at Callander to support sustainable expansion of the town and more local living outcomes, the delivery of strategic development that improves Balloch as a main visitor and transport interchange hub for the National Park as well as continuing place-based partnership working approach at Arrochar and Tarbet to support rural regeneration.

No specific comments, but broadly supportive of this objective.

C31: Nature-first approach to development - New development is helping to create nature-rich places and networks, with stronger connections established between places and habitats within and around the National Park. Ensure new development delivers positive outcomes for nature through securing biodiversity net gains on site and investing in local nature networks identified as part of the development of the new Local Development Plan.

We would like to see a balanced approach to securing biodiversity net gain (BNG) through development. While on site, BNG would be the best-case scenario, we would not want to see

this pursued exclusively at the expense of much needed rural development that could bolster local economies or deliver infrastructure to businesses and communities. We would suggest a more flexible approach that would not lock out development altogether in the event that 'on site' BNG is not possible, by accepting BNG on other sites or the best alternative option. This would help deliver national and local aims of sustainable rural development.

C32: Nature-first approach to development - New development is helping to create nature-rich places and networks, with stronger connections established between places and habitats within and around the National Park. Support awareness raising and sharing of good practice on development and nature.

SLE support this, many of our members will have good practice and lessons to share too.

C33: Delivering positive local outcomes - Development and Infrastructure investment have directly contributed towards the creation of a wellbeing economy where local communities benefit from local wealth generation and are empowered to shape their own places, including more control and influence over land and assets. Support local communities to influence how land and sites are used within and around towns and villages and ensure the benefits arising from this are retained and circulated locally, including greater influence via partnership working with public and private sectors and landowners and/or potentially through more community ownership of land and assets.

Supporting local communities to influence how land and sites are used should be based on realistic outcomes of land management practices. Communities should also be made aware of national policy objectives and how these are a major driver of land use and should be supported to understand that trade-offs often have to occur between local/regional/national interest in order to deliver. Too often we see communities given unrealistic expectations about how they can influence land use or change the way something is done in a way that is contrary to delivering local, regional or national priorities. This must be delivered pragmatically, and a culture of positive relationship and trust building must be fostered within communities so that they can approach landowners with an understanding of their point of view as well as the practicalities of changing land use.

Re community benefit, we are working extensively with Government agencies, investors and other forums to develop a community benefit aspect of certain markets and other types of land use. Unfortunately, the nature of some types of land use (carbon sequestration for example) is not conducive to delivering monetary community benefits in the same way that renewables are, and communities should be supported in understanding this, so they are not given unrealistic expectations.

It is therefore important that community benefit is recognised as not only being monetary, and alternative benefits accepted, such as climate change resilience and mitigation, provisions for easier responsible access routes or training schemes, and that this is communicated appropriately to communities through a neutral third party authority.

Community benefit discussions should be accompanied by an understanding of the risk involved in projects and benefits should be relative to this risk (e.g. in a strictly community

benefit model, communities do not take on any of the risk involved with potential wind damage to tree planting, and this should be factored in to any potential returns).

Finally, there are many case studies emerging that are exploring partnership working between communities and public and private sectors through alternative governance/tenure models, and we support this approach where it is mutually beneficial for landowner (of any kind) and community, providing communities have adequate support and expertise to engage in this effectively.

C34: Delivering positive local outcomes Development and Infrastructure investment have directly contributed towards the creation of a wellbeing economy where local communities benefit from local wealth generation and are empowered to shape their own places, including more control and influence over land and assets. Through the new Local Development Plan set out an approach for inward investment in the tourism sector, recognising the important role of this sector to the rural economy and livelihoods, whilst seeking to balance this with environmental carrying capacity and community views and aspirations on use of land and sites of local community importance.

We generally support this and would emphasise the importance of early engagement with landowners in the Park to identify opportunities and challenges relating to this, with a view to aligning these with the outcome of the community engagement aspect of the LDP process.

C35: Making the best use of land and assets Vacant and derelict sites within many of the National Park's communities are being brought back into use and help to meet the needs of local communities and businesses or are restored to provide green infrastructure and support nature. Work with communities, through Local Place Plans, to identify a list of undeveloped and vacant sites within and around towns and villages and that could be brought into use or restored to improve local places and nature.

Making use of existing assets and development is something we would support, as it already has inherent carbon stored and provides a "low hanging fruit" solution. Local Place Planning is a mechanism we identified that should be explored and supported as an alternative to or before further land reform legislation. Early conversations with landowners may also help to identify sites which may be falling into disrepair or out of use to identify any issues causing this.

As mentioned below, we would like to see the National Park also work with landowners in this capacity to identify opportunities and limitations to what they can help deliver before expectations are placed on them following the adoption of Local Place Plans.

This may also be a good opportunity to highlight the practicalities or realities of land management and land use change, so communities have an understanding and expectations can be managed.

C36: Making the best use of land and assets Vacant and derelict sites within many of the National Park's communities are being brought back into use and help to meet the needs of local communities and businesses or are restored to provide green infrastructure and support nature. Consider and identify the range of interventions required to facilitate bringing

these sites back into use, including community right to buy, finance options and potentially Compulsory Purchase Orders where undeveloped sights are causing significant blight within local communities and/or are impacting on achieving net zero, nature restoration and/or sustainable local living outcomes.

Would a threshold/test be created to measure impact or definition of 'significant blight' and who would be responsible for collecting, submitting and/or holding this information? Would this be on an ad hoc basis through individual communities or would the LLTNPA take a sustained and coordinated approach to identifying said land and what actions they intend to take?

Again, early conversations with owners to identify what is preventing development or renovation would create the best outcomes and reduce burden on the public purse.

C37: Policy for Local Place Plans - communities transition to net zero living and working through actions that increase opportunities for low carbon local living.

No specific comments, but broadly supportive of this objective.

C38: Policy for Local Place Plans - building resilience to the impacts of the changing climate.

No specific comments, but broadly supportive of this objective.

C39: Policy for Local Place Plans - restoring nature on land within, around and between communities

Landowners in the park must be engaged with the Local Place Planning process from an early stage in order to establish the opportunities they can offer and any limitations to what they can help deliver, before plans are made.

C40: Policy for Local Place Plans - increased collaboration between communities and between communities and a range of public, private and third sector partners.

There are opportunities for our members in the area to share good practice with other private and public landowners (e.g. Luss Estates has an extensive Strategic Community Development Framework). This took some significant investment to undertake but there are likely to be lessons and ideas in it worth sharing with their peers in the LLTNP within their own resources.

Does LA/LLTNP have adequate planning resources to help communities undertake Local Place Planning? Could more be done to support communities do this?

C41: Policy for Empowering Communities - supporting the preparation and implementation of Local Place Plans.

We generally support the preparation of Local Place Plans and have called on the Scottish Government to consider how these can be used to further their land reform ambitions without the need for further cumbersome legislation. This should only be promised if every community has equal resource and support to undertake this, and we would strongly encourage landowners to be involved in the process at an early stage.

This will highlight areas of contention or opportunity very early on and may also be an opportunity to directly strengthen some relationships between landowners and communities. There is a huge opportunity here to get landowners and communities to work together to deliver for the Park and better understand each other's ambitions, capabilities and limitations.

C42: Policy for Empowering Communities - supporting increased opportunities for communities to consider and inform how land and sites are used and developed to help support resilient, sustainable, vibrant and healthy communities.

No specific comments, but broadly supportive of this objective.

C43: Policy for Empowering Communities - consideration of opportunities to support local wealth building through generation and retention of more wealth by local community organisations and local rural businesses.

Relationships between communities and landowners are important here, and while most landowners in the area do undertake extensive community engagement activities already (some have full strategies), it would be helpful if the Park played a role in bringing them together to foster most constructive relationships and working, to allow communities to understand how different aspects of land management are carried out, and what they can reasonably expect to influence. This would foster constructive working.

C44: Policy for Meeting Rural Housing Needs - focussing new housing provision on addressing local housing needs of communities and the rural economy.

We generally support these policies and would additionally encourage consideration of how national policies have affected existing housing supply.

C45: Policy for Meeting Rural Housing Needs - a continued focus on enabling affordable housing delivery, including a more diverse range of affordable tenures and addressing the challenges of delivering rural housing.

We generally support these policies and would additionally encourage consideration of how national policies have affected existing housing supply.

C46: Policy for Meeting Rural Housing Needs - consideration of the interventions required to stop the loss of housing from the existing housing supply.

We generally support these policies and would additionally encourage consideration of how national policies have affected existing housing supply.

C47: Policy for Development and Infrastructure Investment - Support tackling the climate emergency

See below C48.

C48: Policy for Development and Infrastructure Investment - Maximise opportunities to deliver or unlock nature restoration.

Our members are well placed to deliver on tackling the climate emergency and nature restoration and most if not all are already undertaking a variety of land management activities to support this. As NatureScot has said, landscape-scale is needed to for nature

restoration to be effective so the Park must acknowledge the need to work at scale and balance this with its commitment to empowering community use/ownership of land and assets.

A major issue we have identified when landowners (of all ownership models and sizes) intend to carry out significant land use change for nature restoration afforestation or other environmental measures, is objection from one or two people in a local community. These objections, simply because they do not like the idea of whatever project is taking place, can frustrate the course or viability of a project. These people often do not represent the silent majority of the rest of the community and their objection often comes from a lack of understanding of the importance or process of a project and what it may mean in the national interest or how it may be driven by Scottish Government land use policy and targets. This is all despite extensive and open community engagement from landowners or developers.

We are calling on National Park Authorities and other bodies (such as the Scottish Land Commission) to find a way to educate and support community members in understanding the importance and practicalities of these projects so that they can be delivered in the local, regional and national interest, while of course being balanced with the needs of communities.

C49: Policy for Development and Infrastructure Investment - Respond to meeting the needs of National Park communities and support more local living and working.

No specific comments, but broadly supportive of this objective.

C50: Policy for Development and Infrastructure Investment - Support a just transition for local businesses towards a greener, low carbon economy.

We are pleased to hear that there will be support for business in the just transition, and some of our members may be well placed to share good practice and inspire others in the park to take similar steps or find innovative new ways of working. Landowners, who are already delivering business opportunities and climate and nature restoration on the ground, should be consulted at early stages of any policy development so that authorities can understand how they will affect sustainable development in practice.

The explicit need for **sustainable development** must not be forgotten about and would like to see this referenced in this policy.

C51 - Policy for Development and Infrastructure Investment. Support growing a wellbeing economy including through opportunities for local wealth building and greater community led development and project activity.

As evidenced in the BiGGAR Economics report *Rural Estates' Contributions to the Wellbeing Economy*, landowners make a significant contribution to Scotland's Wellbeing Economy and this will also be seen throughout the National Park. As well as community led development and project activity, our members should also be supported and encouraged to continue to deliver and increase their contributions to the Wellbeing Economy. We would like to see the support for growing a wellbeing economy extended to small and medium enterprises in the park regardless of ownership structure.

There is also an opportunity for our members to assist with the community led project activity in that they offer employment opportunities all year round and seasonally – 1 in 10 rural jobs in Scotland are supported by a land-based business, making them important contributors to rural employment and wider entrepreneurial activity under the Economy indicator of Scotland's National Outcomes. <sup>1</sup> There is also evidence in the report that the jobs on rural estates are relatively high quality, above the national average. As a sector we are actively considering how we can increase these contributions as well as wider contributions to the wellbeing economy, such as communities, the environment and the four Capital stocks (natural, social, economic and human).

Housing plays an important part in growing a wellbeing economy, not only so that people have somewhere to live for their own wellbeing but so they can work and enjoy the park and contribute to wider social and economic development.

C52 - Strategic scale development will be supported at Callander, Arrochar, Tarbet and Balloch through: Delivery of the southern expansion of Callander, needed to facilitate sustainable expansion of the town and to provide mixed uses in support of the development needs of both Callander and surrounding rural communities for which it acts as a service hub. The New Local Development Plan will re-consider the requirement for longer term land release beyond the currently identified mixed used development site for which a masterplan has been prepared to guide and support development.

In the development of a new LDP, we would encourage very early engagement from the Local Authority and the National Park Authority with landowners in the area. Another Local Authority has already approached Scottish Land & Estates to engage with its members in the area and the meetings have proved useful. This early, almost informal engagement allows landowners to understand how they can contribute to the development of the local area and deliver against community aspirations, and equally communicate the challenges they may face in doing so, so that problems can be identified early on. This approach will help foster stronger working relationships between authorities and landowners, as well as help the development of the area reach its full potential.

C53: Strategic scale development will be supported at Callander, Arrochar, Tarbet and Balloch through: The prioritisation of development and infrastructure within Arrochar and Tarbet that helps unlock constrained, vacant and derelict sites, bringing them back into use in ways that support identified community needs, low carbon local living and improves infrastructure for visitors.

No specific comments, but broadly supportive of this objective.

C54: Strategic scale development will be supported at Callander, Arrochar, Tarbet and Balloch through: The delivery of tourism investment in Balloch as a core strategic tourism gateway location, with opportunities for improved transport interchange as well as job creation and wider economic regeneration with adjoining areas to the National Park.

No specific comments, but broadly supportive of this objective.

C55: Strategic scale development will be supported at Callander, Arrochar, Tarbet and Balloch through: Large scale wind farms will not be supported within the National Park in accordance with National Planning Framework 4. Wind Farm proposals adjacent to the

National Park should be located and designed in ways that do not adversely impact on the special landscape qualities of the National Park.

No specific comments, but broadly supportive of this objective.

#### **Respondent 46**

##### **Strathard Community Flood Group**

Page 112 of the draft plan states the Policy for Empowering Communities as follows:

*“POLICY FOR EMPOWERING COMMUNITIES The National Park Authority and its partners will support communities to grow their influence to shape their local places through: » supporting the preparation and implementation of Local Place Plans » supporting increased opportunities for communities to consider and inform how land and sites are used and developed to help support resilient, sustainable, vibrant and healthy communities. » consideration of opportunities to support local wealth building through generation and retention of more wealth by local community organisations and local rural businesses.”*

Peak flooding in Strathard represents a recognised infrastructure deficiency. Lack of road access west of Aberfoyle during floods adversely affects residents, businesses and tourists, and development opportunities. This is shown by the recent Stirling Council objection to a tourist development in Kinlochard based on the effect of flooding on road access. This adversely affects a sustainable visitor economy which is an objective of the plan.

Page 114 states that the National Park will *support “growing a wellbeing economy including through opportunities for local wealth building and greater community led development and project activity.”*

Page 91 recognises the River Forth flooding problem along with the need to support rural communities. It states:

*"We need to support communities to adapt to the changing climate and how this directly impacts their infrastructure, like roads, and environment."*

Page 105 states:

*"This means a fresh new approach towards guiding new development and infrastructure within the National Park, that is more closely aligned to facilitating the required land use change to deliver for climate and nature and meeting the needs of those living and working in the National Park."*

Page 113 (third point) states:

*Development and infrastructure in the National Park will: "Respond to meeting the needs of National Park communities and support more local living and working."*

These policy statements conflict with what has been happening and is happening in Strathard. As such they are proving to be alleged aspirations rather than policy statements.

Page 106 refers to the Strathard Framework as a successful pilot. This includes acceptance of the policies for Aberfoyle of a flood risk management scheme which was adopted by Stirling Council and presented for funding to the Scottish Government. The scheme was so expensive that the Scottish Government would not fund it. This remains the position. However what is worse is that the Strathard Community informed Stirling Council at a committee meeting held on 5<sup>th</sup> June 2014, that the community was opposed to the scheme on the grounds that it spoiled the amenity of the village and failed to address the intermediate flooding incidence.

These objections were ignored. They have been ignored in all recent policy statements. The Community has prepared a proposal to address its objections principally by removing the hard engineering works from the village of Aberfoyle to high in the Duchray catchment. The effect of this would be to reduce the cost of the alleviation measures by avoiding significant engineering work in Aberfoyle village and to reduce peak flood flows not only Aberfoyle but through the whole river basin of the river Forth thus reducing the frequency and depth of damaging flooding

The serious flooding problem in Aberfoyle remains, with no document from any of the relevant authorities giving any indication of a proposal for an affordable alleviation scheme. This experience destroys the confidence of the local community that these fine policy statements have any meaning in practice.

There needs to be a serious statement of intent from the relevant authorities that action will be taken to deal with the flood risk issue in a realistic way. It is easy to treat regulation as a way of preventing action for example, by refusing planning permission. It is much more difficult for the relevant authorities to provide support to help communities to achieve the goals of the policies they make.

## **Respondent 47**

### **RWE Renewables (RWE)**

I am writing on behalf of RWE Renewables UK (RWE) in response to Loch Lomond & The Trossachs National Park Authority consultation on the Draft National Park Partnership Plan 2024 - 29.

RWE is the largest power producer in the UK, accounting for around 15% of all electricity generated, with a diverse operational portfolio of onshore wind, offshore wind, hydro, biomass and gas, amounting to over 10 gigawatts (GW) of generation pro rata.

Scotland has been a natural partner for RWE for over 20 years, where we own and/or operate around 480 megawatts (MW) of installed renewable capacity across 26 sites, including 15 small scale hydroelectric projects, 10 onshore wind farms and 1 offshore wind project. RWE also operates a 55MW biomass combined heat and power district heating plant at Markinch, Fife.

RWE have the following comments framed around the consultation questions as highlighted below.

[Do you have any comments on the policies outlined in each area of the Draft Plan?](#)

*Policy for Development Infrastructure and Investment*

This policy states that *“Wind Farm proposals adjacent to the National Park should be located and designed in ways that do not adversely impact on the special landscape qualities of the National Park.”*

NPF4 Natural Places Policy 4c states that *“Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where: i. The objectives of designation and the overall integrity of the areas will not be compromised; or ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”*

According to NPF4 a Wind Farm proposal which has significant adverse effects on the qualities for which a National Park has been designated, may be found to be acceptable when outweighed by social, environmental or economic benefits of national importance.

We suggest that the Draft Plan wording is amended to reflect this NPF4 policy.

[Can you suggest any other objectives or actions to help us meet our aims in each area of the Draft Plan?](#)

RWE suggest that the National Park can contribute towards greenhouse gas emission reduction targets through support for a variety of renewable technologies beyond Wind Farms such as Solar, Battery Storage and Green Hydrogen, which could potentially be accommodated within the National Park without unacceptable impacts. Renewable developments would help support green jobs and the transition to electric vehicle use and the necessary electrical infrastructure.

**Respondent 48**

**Rewilding Britain**

Rewilding Britain is the first and only country-wide organisation in Britain focusing on rewilding and the amazing benefits it can bring for people, nature and climate.

At Rewilding Britain, we define rewilding as the large-scale restoration of ecosystems to the point where nature is allowed to take care of itself. Rewilding seeks to reinstate natural processes and, where appropriate, missing species – allowing them to shape the landscape and the habitats within. The Chief Scientific Adviser (Environment, Natural Resources and Agriculture) to the Scottish Government recently endorsed a definition of rewilding developed by the James Hutton Institute<sup>1</sup>. This definition echoes our own understanding of the concept:

*“Rewilding means enabling nature’s recovery, whilst reflecting and respecting Scotland’s society and heritage, to achieve more resilient and autonomous ecosystems.”*

Rewilding encourages a balance between people and the rest of nature so that we thrive together. It can provide opportunities for communities to diversify and create nature-based economies; for living systems to provide the ecological functions on which we all depend; and for people to reconnect with wild nature. It complements, and does not replace, our well-established management-based approach to species and habitat conservation. It offers a significantly less resource-intensive way to restore nature at scale, allowing dynamic natural processes to drive change, leading to better functioning ecosystems and increased resilience.

Rewilding can therefore play an essential role in tackling nature loss and the climate emergency. We believe that creating wilder National Park is vital for addressing both these crises. We feel that government pledges to protect 30% of land and sea for nature by 2030 are not credible without ensuring wilder national parks.

### Wilder national parks

In order to genuinely achieve nature's recovery across 30% of land and sea by 2030 we are asking our National Parks to establish:

1. **Core rewilding areas** across at least 10% of the park by 2030 which focus on restoring and reinstating as wide a range of natural processes, habitats and missing species as possible to form mosaics of native forest, peatlands, heaths, species-rich grasslands and wetlands. There should be minimal or no human impact or extraction of resources.
2. **Rewilding areas** across at least 50% of the park by 2030 which support a diverse range of land uses and enterprises, generating value for the local economy while allowing nature to flourish, e.g. continuous cover forestry, nature-based tourism, recreational fishing and high-nature value/wild meats.

In its advice to Scottish Ministers published in February 2023, NatureScot supported the inclusion in the legislation of an overarching purpose for National Parks to increase their contribution to the nature and climate challenges we face. Alongside our partners in the Scottish Rewilding Alliance, we support this recommendation.

### [Loch Lomond and the Trossachs - Draft National Park Partnership Plan 2024-29](#)

We applaud the Draft National Park Partnership Plan for its acknowledgement that in the face of the climate and nature crises, we need to actively expand and improve natural habitats, allowing nature to recover and thrive. We welcome the Park's commitment to halting the decline of nature within the park by 2030, and facilitate widespread restoration and recovery of nature by 2040.

However, we believe that this ambition will be best realised through the creation of substantial rewilding areas. These should focus on restoring and reinstating as wide a range of natural processes, habitats and missing species as possible to form mosaics of naturally functioning forest, peatlands, heaths, species-rich grasslands and wetlands. There should be minimal human impact or extraction of resources. Collaboration with partners is, of course, key to the success of establishing rewilding areas within the national park.

NatureScot has also recommended investigating the possibility of identifying “priority nature zones” to enable landscape-scale restoration, allowing national parks to formally contribute to 30x30 and nature network targets. There are many examples in other countries of national parks allowing the large-scale recovery of nature through rewilding.

We would also like to see the restoration of nature linked to the establishment of a vibrant Nature-Based Economy across the park which allows nature to heal and flourish whilst supporting prosperous communities.

We provide specific responses to the Restoring Nature and Enabling a Greener Economy and Sustainable Living plans below. If Loch Lomond and the Trossachs National Park is interested in exploring how rewilding can help the park meet its goals on climate and nature, as well as provide a viable future for people living within the park boundaries, we would be happy to discuss this in the future.

### Restoring Nature

*Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?*

Conservation efforts within Loch Lomond and the Trossachs National Park have helped to preserve threatened habitats and species, with success stories like red squirrels, wading birds, new woodlands and water voles. As the Draft Plan says, such efforts have been dwarfed by damaging land use activities. Despite valiant efforts on the part of conservationists who have fought for years to safeguard nature, a quarter of features in Sites of Special Scientific Interest within the National Park area are not in a favourable condition. Rewilding takes conservation action to the next level, offering an affordable way of managing land for nature that can sit alongside more traditional conservation methods.

We support the park’s ambition to scale up action to restore peatlands, encourage tree cover and improve the quality and ‘naturalness’ of bodies of water. However, we recommend that a landscape-scale approach should be the top priority. Allowing large areas of the park to recover will have the greatest positive impact on carbon sequestration, habitat creation and climate mitigation efforts. Rather than focusing on key features or key habitats, the aim should be to assist nature in creating a complex mosaic of different habitats.

Additionally, the Draft Plan should consider how rewilding fits into its priorities and actions. Rewilding can offer a relatively low-cost, high-impact route to restoring nature at scale.

Rewilding is the large-scale restoration of nature until it can take care of itself – and us – again. It focuses on restoring nature’s remarkable web of life, including habitats, natural processes and, where appropriate, missing species. Where traditional conservation takes a species-focused, fine-tuning approach, rewilding takes a looser, systems-based approach. It focuses on the large-scale restoration of ecosystems. It aims to give nature the space and freedom to recover, grow and adapt on its own terms. The only expectation is that natural processes will drive change, leading to better functioning ecosystems and increased resilience.

A commitment to 10% of the park becoming 'core rewilding' areas would provide space for nature to regenerate at scale. A further 50% of the park transitioning towards rewilding would create opportunities for nature and people to thrive alongside each other. Over time, these large rewilding areas would kickstart the dynamic adjustments nature needs to recover and expand - particularly in the face of an increasingly unpredictable climate.

As the Draft National Park Partnership Plan recognises, many landowners within the park area are already protecting and expanding the precious habitats they care for. This includes rewilding projects within the park area. Mapping these projects, and the areas of the park with the most naturalness potential, could provide the National Park with a routemap for the large-scale rewilding of the park area.

### *How do we measure success?*

Ultimately, the aim of restoring nature should be an ecosystem that functions naturally without excessive human intervention. A State of Nature assessment conducted every 5 years could be an effective way to measure the effectiveness of the park's policies in restoring nature at scale without focusing on individual habitats or species. Clearly, such an assessment undertaken across the whole of the park would be helpful in establishing the

current condition of the park as one area. We would like to see more detail on what indicators might be included and whether pressures on nature will be taken into account and measured.

Alongside or within this assessment, it might also be useful to draw out specific indicators and make commitments along the lines of those made for peatland or trees across the park area, such as area of rewilded riparian buffer zones, km of hedgerow or deer density.

Additionally, indicators such as species abundance - including a minimum of three taxonomic groups - and the structural complexity and diversity of vegetation are indicators of a functioning ecosystem.

### *Do you have any comments on the policies for Restoring Nature?*

We agree that taking a landscape-scale Nature Network approach is a viable route to addressing the ongoing decline in nature. However, we strongly recommend that rewilding principles are adopted, so that the park's efforts can result in healthy, functioning habitats across large areas. Peatland restoration, woodland expansion, reduction in grazing pressure, tackling Invasive Non-Native Species and improving marine environments are all potential elements of a rewilding approach. Working at scale and connecting up existing areas of high nature value are also common elements of rewilding efforts. However, rewilding takes this further.

Change and adaptation is a fundamental part of nature. Rather than fine-tuning areas to benefit particular species, rewilding at scale opens up the possibility of letting species find their place in a rich and complex ecosystem, rather than being perpetually depending on expensive

habitat and species management. As larger, wilder landscapes emerge, new, more dynamic relationships between species develop. Ideally, these landscapes will include the presence of keystone species like beavers or oysters. Wilder cattle, pigs and horses allowed to express their natural behaviours can also play their part.

We support the park's objective to tackle Invasive Non-Native Species at a

strategic, large-scale, with the aim of reducing them to a point that they no longer create a threat to native ecosystems. Repairing ecosystems, reducing the need for human intervention in natural processes, is a key principle of a rewilding approach. We would suggest that by re-establishing species and restoring ecosystems, some of the effort involved in tackling invasive non-native species might be reduced.

When it comes to increasing tree cover, we set out a Three Step Natural Regeneration Hierarchy as a practical model for decision making in our *Reforesting Britain* report<sup>2</sup>. This should be part of a broader rewilding approach where species-rich mosaics of woodland, scrub and grassland habitats are allowed to regenerate over large landscapes. The hierarchy starts with natural regeneration as the default approach, with tree planting as a support option where the natural regeneration of diverse habitats will not happen without it.

We support the park's intention to pilot a Regional Land Use Partnership, ensure planning policies support rural development and use grants and subsidies more effectively and map out green skills capacity. However, we suggest that a more effective approach would be to make the link between nature and economic development clearer through advocating for and establishing Nature-Based Economies. We explore this in more depth in the next section, *Enabling a Greener Economy and Sustainable Living*.

We are pleased to see that the National Park intends to have clear policies underpinning its approach to green finance.

*Who needs to be involved in Restoring Nature?*

We agree that a multi-agency response is required. The forum in which these agencies make decisions is crucial: often, large national organisations can have an outsize influence on local landscape decisions. Managing land for the benefit of nature, local communities and the wider public requires collaborative decision-making in which everyone is given a voice - but where the long-term aims are always kept in mind.

[Enabling a Greener Economy and Sustainable Living](#)

*Can you suggest any other objectives or actions to help us meet our aims for Enabling a Greener Economy and Sustainable Living?*

We support the ambition of enabling a greener economy and more sustainable living, but would like to see explicit support for the establishment of Nature-Based Economies.

Rewilding Britain defines a Nature-Based Economy as one which helps nature heal and flourish and supports prosperous communities. In Nature-Based Economy areas, existing rural and coastal enterprises and production sectors are incentivised to transition towards a high-nature value model.

We believe that a new and thriving ecosystem of employment can be built around the restoration and rewilding of nature. National parks, which combine a pre-existing collaborative approach with the leadership capacity of the national park authority, are exceptionally well placed to pioneer this approach. Nature-Based Economies enable a balance between the level of wild nature and the needs of other economic activities such as farming and forestry.

Rewilding Britain is calling for nature's recovery to be put at the heart of the economy by adopting an integrated, localised and nature-based approach to land and marine use. We make recommendations about how this can be done in our report on 'Rewilding and the rural economy'.<sup>3</sup> In particular we recommend:

3. Commit to the creation of Nature-Based Economies (NBEs) within the park area, shaped by local communities and led by trusted anchor institutions.
4. Incentivise NBEs through coordinating finance and regulation, reorienting public funding towards their support.
5. Develop locally-driven public investment vehicles which provide concessionary finance to small and medium nature-based enterprises within NBEs and reinvest the returns in new projects.
6. Enhance localised decision-making through encouraging diverse land ownership models within NBEs.
7. Support local anchor institutions to attract and coordinate significant inward investment and ensure that benefits accrue to the local economy.

#### *How can we measure success?*

We agree that measuring population, number of green jobs and community-led projects, as well as other proposed indicators, is useful. One advantage of taking a place-based approach to economic development and developing Nature-Based Economies would be an enhanced ability to measure these indicators. Tracking spend on local services would also provide a measure of success: for example, the Northwoods Rewilding Network found that network members spent over £1 million on local services and suppliers in its first two years of operation.

We note that one possible suggested indicator would be the number of community organisations able to influence or lead improvements to their local places - some of these organisations might be well placed to be 'anchor institutions' for Nature-Based Economies.

#### *Who needs to be involved in Enabling a Greener Economy and Sustainable Living?*

As above, a multi-agency response is required. The place of communities in this should be given careful consideration. Community is a complex concept. Speaking with communities and being led by communities require well-designed vehicles for collaboration and decision-making. Trusted anchor institutions are also key to developing Nature-Based Economies, and thought should be given to developing these institutions where they do not already exist.

### Conclusion

*Do you have any other suggestions for how we create a more sustainable future for nature, climate and people in the National Park?*

Rewilding can deliver enormous benefits for nature, climate and people. In a wilder National Park, nature is rebounding: there are more saplings and scrub regenerating on the hills, the rivers are cleaner and less prone to flooding thanks to beaver reintroductions, and peat bogs have become net carbon sinks again after being restored.

But, crucially, there are also people in this wilder landscape. People who are working on the land and sea, whether they're restoring naturally-flowing rivers, mixing stock management with wildlife guiding, running community engagement activities, carrying out monitoring and

research, leading recreational fishing trips, or learning from the Norwegian model to pioneer wild field sports. And more people are visiting the area to see the resurgent wildlife, visit eco-tourism projects, and spend their money in local cafes, pubs and shops. Rewilding and 're-peopleing' can and must go hand in hand.

As above, we recommend that the National Park investigates how rewilding can assist with its mission. Around the world, and across Scotland, rewilding projects are restoring nature, bolstering local economies and creating incredible places where people want to be. National parks are key to helping landowners and communities access the potential rewards of rewilding while creating significant public benefit.

We would be happy to provide Loch Lomond and the Trossachs National Park with further information and evidence about rewilding. In particular, we can provide a model for identifying areas where rewilding could be achieved in the park, the impacts of rewilding in these areas in terms of changes in land management and the benefits and trade-offs of doing so.

**Respondent 49:**

**NFUS**

NFU Scotland (NFUS) welcomes the opportunity to respond the Loch Lomond and Trossachs National Park (LLTNP) National Partnership draft plan consultation.

The Forth and Clyde and Argyll and Islands Regions of NFUS held an online engagement session for members who live within the national park and members of the LLTNP team. There was a disappointing representation attended this session.

Members were therefore encouraged to submit their own responses to the consultation.

The views for this response have been gathered from members submissions and from the work we have previously conducted nationally on the future of national parks in Scotland.

### **Restoring Nature**

**Which of the objectives on Restoring Nature for Climate can you or your organisation help to deliver?**

1. Peatland
2. Trees
3. Water

**Which of the objectives on Shaping a New Land Economy can you or your organisation help to deliver?**

4. Green Jobs, Skills and Business Opportunities

What role can you play in delivering these objectives or actions?

NFUS have a number of members within the national park who own/farm/manage many of the farmland within the national park and will play a key role in nature recovery and reaching net zero.

Many of these members have already undertaken practices to obtain these goals.

Consultation and communication with Farmers and Land managers is crucial. Guidance, clarity, and support is required from the National Park to help achieve the aims and objectives proposed which could be supported by NFUS.

**Are there any challenges or barriers we need to overcome to help you do this?**

We may not represent all farmers and landowners within the National Park and therefore the national park will also have to look at ways to engage with all.

Local residents and visitors to the National Park need to be made aware of what farmers and land managers are already doing to restore nature but it raises the question to whose role that is.

Farmers and Land Managers within the national park would welcome regular engagement but have highlighted that the times are rarely suitable and have also expressed that there is lack of incentive or support but should also be acknowledged that some members have benefited, so there is potentially a gap in communication.

**Can you suggest any other objectives or actions to help us meet our aims for Restoring Nature?**

Farmers and Land Managers are fundamental to rural communities and their expertise should be utilised to understand what the nuances of the local area are, and what is best for the economy, the people, as well as climate change and diversity.

Working collaboratively on access issues and educating those visiting there park how to be responsible access takers.

**Do you have any comments on these proposed measures or any other suggestions?**

Regarding the reduced grazing pressures, it is unclear to whether this is for 'wild animals' only and not farmers animals where grassland is managed?

**Which delivery partners do you think have the biggest role to play in Restoring Nature? Feel free to add any you think we are missing from this list.**

5. Scottish Government
6. NatureScot
7. Scottish Forestry
8. Forestry & Land Scotland
9. Scottish Environment Protection Agency
10. Scottish Water
11. Scottish Land & Estates
12. NFU Scotland
13. Environmental NGOs & charities
14. Deer Management Groups
15. Private land managers & their agents
16. Local communities & rural businesses
17. Rural skills training providers

### **Creating a Sustainable, Low – Carbon Destination**

**What role can you play in delivering these objectives or actions?**

As highlighted, many of our members within the national park who own/farm/manage many of the farmland within the national park and will play a key role in nature recovery and reaching net zero.

Many members within the National Park have diversified into agritourism ventures. It was said that farm tours could offer education opportunities for people who want to learn about agriculture and biodiversity.

**Can you suggest any other objectives or actions to help is meet our aims for Creating a Sustainable, Low – Carbon Destination?**

There is evidence of overcrowding, congestion on roads, campsites, irresponsible access, dog issues, littering and other antisocial behaviours within the park.

Could more be done to advertise and raise awareness to these issues and educate visitors on the impacts it has to the national park and change the 'festival goer' culture to a wide audience. As this culture needs to change to meet many of the plans aims & objectives.

**Do you have any comments on these proposed measures or any other suggestions?**

There is concern that there is no mention of the benefits that agriculture delivers for many of the objectives laid out, in fact next to no mention of Agriculture at all.

Agriculture is a key economic driver and food production should be a key facet of the national park.

**Which delivery partners do you think have the biggest role to play in Creating a Sustainable, Low-Carbon Destination? Feel free to add any you think are missing from this list.**

18. NatureScot
19. Tourism, hospitality, leisure & recreation businesses
20. Transport Scotland
21. Police Scotland
22. Forestry & Land Scotland

23. Sustrans
24. Local Authorities
25. VisitScotland
26. Scottish Enterprise
27. Landowners & managers
28. ScotRail

### **Enabling a Greener Economy and Sustainable Living**

#### **What role can you play in delivering these objectives or actions?**

As highlighted, many of our members within the national park who own/farm/manage many of the farmland within the national park and will play a key role in nature recovery and reaching net zero.

#### **Do you have any comments on these proposed measures or any other suggestions?**

There is concern that the growth and development of farming businesses such as renewable energy developments, construction of farm sheds or changes to farming practices may become more difficult under the national park aims and would like to highlight the importance of farming businesses to Scotland – not just for food production, which is vital, but for contributing to the net-zero targets, protecting and improving biodiversity, creating local employment and sustaining the wider rural economy.

A recurring concern from our members is that increased tourism and visitor access has driven up the price of property, thereby pricing out locals and resulting in an influx of wealthy most often second homeowners. This is then putting pressure on labour issues with unaffordable housing and a public transport system that often is unreliable.

### **Respondent 50:**

#### **Historic Environment Scotland**

Historic Environment Scotland recognises the need for a focus on climate and nature. The historic environment can and must be part of our response to our changing world and the challenges we face.

Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations. Plan making should be approached in a way that protects and promotes the historic environment.

In view of this, whilst we support the draft Plan's strong vision for a transformative, step change in the way in which the twin climate and nature crises are addressed,

we are concerned that cultural heritage, and the historic environment in particular, are largely absent from the draft Plan.

We consider that this could make it difficult for the Plan to deliver the aims of National Parks in Scotland in relation to cultural heritage, to align with [Historic Environment Policy for Scotland \(HEPS\)](#) and [Our Past Our Future: The Strategy for Scotland's Historic Environment](#), and to take advantage of the many opportunities that cultural heritage and the historic environment offers for addressing the climate and nature crises.

### **Key recommendations**

The Plan should be considerably strengthened in terms of conservation, enhancement and promotion of the historic environment, and should recognise that historic environment has a vital part to play in addressing the climate and nature crises

We'd like to see the Plan:

- promoting a holistic approach to environment, encompassing the natural and the historic.
- embedding cultural heritage and the historic environment within the policies and actions of the Plan so that they can play their key role in addressing the twin crises to the full.
- ensuring that seeking opportunities to deliver mutual benefits for all aspects of the environment, including the historic, are at the heart of the Plan.

We have provided detailed comments on this at Annex 1.

### **Annex 1 – Detailed Comments on the draft Partnership Plan**

#### **The historic environment and its role in addressing the climate and nature crises**

We recognise the need for plan-makers to focus on addressing the twin climate and nature crises.

This approach is embedded in key national historic environment policy and strategy, including the [Historic Environment Policy for Scotland \(HEPS\)](#) and [Our Past Our Future: The Strategy for Scotland's Historic Environment](#). National Planning Framework (NPF4) recognises a key policy connection between the historic environment and climate mitigation and adaptation.

Our [Green Recovery Statement for the Historic Environment](#) supports the green principles set out by the Scottish Government and highlights how the historic environment can contribute to the national transition to a low carbon, resource efficient and socially inclusive wellbeing economy.

[Pointing the Way to the Future](#), a position statement which sets out how we will undertake our regulatory work in the context of the twin crises, also provides a

helpful picture of the connections between the historic environment, nature and climate

## **Protection and promotion of the historic environment**

Our heritage – whether tangible or intangible, cultural or natural – enhances our quality of life and is a hugely valuable economic, social, environmental, and cultural resource. Caring for the historic environment benefits everyone, now and in the future.

We recognise that the Partnership Plan will be key to the way in which the National Park is managed collectively over the coming years. It carries additional weight because it will also be the Regional Spatial Strategy for Loch Lomond & The Trossachs National Park, setting out a long-term spatial strategy in respect of strategic development, and informing future iterations of the Local Development Plan and National Planning Framework.

Because of this, it is vital that the Plan is the best it can be in terms of conserving and enhancing the historic environment, and ensuring that it can deliver its benefits for people, climate and nature to the full.

The [Historic Environment Policy for Scotland \(HEPS\)](#) directs decision making which affects the historic environment. Good decisions (including plan-making) will aim to achieve the best possible outcome for the historic environment and maximise its benefits.

In the context of the emerging Partnership Plan, all six HEPS policies apply and the following policies are of particular relevance:

**HEPS 2:** Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

**HEPS 3:** Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

**HEPS 5:** Decisions affecting the historic environment should contribute to the sustainable development of communities and places.

## **Restoring Nature**

### *RESTORING NATURE FOR CLIMATE*

We advocate a holistic approach, which seeks to optimise mutual benefits for the natural and historic elements of the environment. All of our landscapes, rural and urban, are part of the historic environment. Natural and cultural benefits and outcomes are often interdependent. But to achieve the best outcomes, it is essential that this approach is embedded in the language, objectives, actions and policies of the Plan.

## *RESTORING NATURE FOR HEALTHY ECOSYSTEMS*

Activities such as peatland restoration, tree planting, grazing management, water management and wetland expansion have the potential for both positive and negative effects for the historic environment. The Plan needs to ensure that is clear that activities to deliver those outcomes should seek to bring benefits for the historic environment too.

## *SHAPING A NEW LAND ECONOMY*

The historic environment is often a key element of the infrastructure and offerings of rural businesses. The Plan should recognise that a holistic approach to land use change, land management and land economy is likely to unlock new and more diverse opportunities for funding and support, whilst ensuring the historic environment assets can be retained, maintained and used sustainably.

### **Creating A Sustainable, Low-Carbon Destination**

## *CONNECTING EVERYONE WITH NATURE*

The Plan should recognise that cultural heritage and the historic environment are powerful tools to connect people to nature, and can provide a broader range of ways to increase interest and diversity. Taking a holistic approach to the environment, encompassing the natural and the historic, enables a broader scope for alignment to education curriculums.

## *IMPROVING POPULAR PLACES AND ROUTES*

The places, routes and infrastructure that link people to the environment and nature are frequently historic, playing a key role not just in practically connecting people with the natural environment, but also enriching their experience of it.

It is important that the Plan is able to recognise and champion this, whilst also protecting and enhancing these valuable historic environment assets to ensure they can continue to deliver benefits for future generations.

## *LOW CARBON TRAVEL FOR EVERYONE*

Dispersal of visitors to historic sites and other local attractions in rural areas provides meaningful engagement with local communities, reduces the impacts of overtourism at more popular sites, and creates a more varied visitor experience.

Successful delivery of a system-wide transformation of the National Park's transport sector will require an understanding and appreciation of the historic environment's role in the Park's tourism, leisure and work systems.

### **Enabling A Greener Economy And Sustainable Living**

## *TRANSITIONING TO A GREENER RURAL ECONOMY*

The historic environment has a key role to play in tackling the climate emergency and realising a just transition to net zero.

Traditional buildings (those which are pre-1919) make up 19% of our existing housing stock in Scotland, and a significant proportion of our infrastructure is historic. The maintenance, reuse and adaptation of existing heritage assets mitigates resource scarcity, prevents waste and can reduce carbon emissions if low carbon materials are used. It also makes best use of the embodied carbon in the built assets we already have.

The repair, maintenance and retrofit of existing heritage assets delivers good, green jobs. Investing in the skills training and employment pathways for the sector will enable economic and social resilience at a local level, as well as prevent money and carbon being wasted through poorly informed decisions that can lead to maladaptation.

Heritage tourism can support low carbon activities by using sustainable supply chains, reducing energy use and waste generation on sites, and developing lower carbon and regional itineraries. Tourism can work for the local area when good quality, local jobs are created and sustained, and local businesses and communities are included.

A skilled workforce is crucial for the management, protection and promotion of the historic environment, our places and landscapes. The [Skills Investment Plan for Scotland's Historic Environment Sector](#) identifies a series of actions to address the skills challenges and opportunities in the sector, which supports an estimated 20,000 direct jobs across Scotland covering construction, the creative industries and tourism.

The Plan should ensure that heritage jobs and skills are a key strand of delivery of objectives for a greener rural economy.

### *LIVING WELL LOCALLY*

The historic environment and the traditional materials, construction methods and skills that go with it provide over 5,000 years of accumulated knowledge and practice of how to live sustainably and locally, which is as applicable to the future as it is to being good stewards of the past.

We welcome that this part of the Plan includes actions which encourage the retention and re-use of historic environment assets. It will also be important that the Plan helps deliver well maintained and retrofitted traditional buildings which are more resilient and emit less carbon, helping deliver net zero targets.

HES can offer a wide range of guidance and tools to support LLTNP in ensuring that the historic environment of the Park can play its full role in delivering sustainable, green and successful places. But it is essential that the Plan itself makes those connections to provide the hooks for delivery.

### *HARNESSING DEVELOPMENT AND INFRASTRUCTURE INVESTMENT*

Historic environment regeneration makes good places. By investing in historic assets the appeal of a place is enhanced and attracts inward investment for local residents, workers and visitors. Regeneration activity acts as the catalyst for further economic

investment and business growth, creating and sustaining jobs across the country. Investment in the historic environment supports community wealth building by not only creating jobs and helping to tackle climate change but building resilient, vibrant places.

The Plan should ensure that new development and infrastructure seeks to retain and utilise historic environment assets, and uses the rich historic environment of the Park to inspire and inform the successful places of the future.

## **SECTION 8 – Cycling Event In-Person Surveys**

**Question 1: Tell us about your experiences of using public or active transport (like cycling or taking the bus) in the National Park - Tell us your public or active transport needs**

Public Transport is fine for our needs as retired people with an active lifestyle. I have heard anecdotally it is less useful for individuals working on living in country areas. Particularly a chronic lack of co ordination between modes such as bus and train. The Bus service should operate from the Rail Station, not where it is located now.

The public transport service is infrequent and doesn't allow connections to other transport hubs at appropriate times. The new live tracking on the x10a bus service is a welcome addition. There are no safe active travel links between Stirling and Aberfoyle (the direct route) or the rest of the National Park. Public Transport is expensive, the DRT service seems dysfunctional but has a key potential.

Cycle

Walk and car (as a passenger only - don't drive)

Come with families

Walk and rest

Not enough public transport

Never use public transport within the Park

Usually walk/bike during visit

Walking (with my dog)

Also jog/run

I use a bus pass regularly

Cycling:  
- Glen Douglas  
- WLL cycling  
- Drymen

Walking

I use the train to Balloch regularly because there are so many lovely things I can enjoy around there. I also get the train to Dumbarton to see friends and colleagues. I live in Glasgow.

The train is reasonably good service.

Cycling  
Boat  
Car when going further afield

Utile

Cycling - near Cameron House, need to cut bushes back.

Walk - not all well maintained.

Running - uneven paths in Balloch Park for older people.

Barely use it. Car easier for family.

Wee boy can take ill so public transport not helpful as can't always bring all the gear they need.

Don't use it, just drive around.

Don't think about it, travel everywhere by car so car easier.

The cycle path is so off road between Helensburgh and here. How often are they swept because there is too much broken glass for people to use them safely. Lots of cycle paths appearing but not done in places where people need them.

Train quite a lot - only through to Balloch. Not sure where else to go by train.

Don't cycle as don't own a bike.

Usually drive, so easier.

Not disability friendly.

Not always space for wheelchair so have to rely on someone else driving.

Like exploring NP on bike or running but usually drive here and ditch car.

Try to take train with bike sometimes but it's not always comfortable/not always space for bikes. Don't want to take space away from wheelchairs/pushchairs.

Don't usually use it, usually drive from Glasgow in groups. Train too expensive and not welcoming.

Got water bus before and used bus once or twice but not often. Generally drive because it is easier.

Only use public transport. It was a conscious choice no to have a car and just use bike or public transport.
Often get train with bike and use cycle trails in the NP
Anti social behaviour on trains. Frightening, intimidating.
Came from Dumbarton using bus today. Sometimes gets the bus to Balloch but often can't get further because the times don't work to get to other locations.
Bus pass
Like cycle Lack of roads
Like cycle Lack of roads
E-bike Use recreational Cycle to work
Bus pass
Cycled from Glasgow.
Came from Dumbarton using bus today. Sometimes gets the bus to Balloch but often can't get further because the times don't work to get to other locations.

**Question 2: Are there any barriers holding you back from using public or active transport in the National Park? - Tell us your public or active transport needs**

A greater frequency of Bus services on some routes. Also, little or no provision for the carriage of cycles on buses. Better, cheaper and more regular Waterbus services on Loch Lomond
Cost, safety, frequency and lack of provision and poor connections between communities.

No. All we need is our bikes.
Can't swim Can't cycle Would come by train
Frequency of public transport is not good
Not enough public transport
No idea what public transport is available to and in the Park
No  I prefer to use my car with the dog - easier than buses
I can't cross A82 from the low stop to a safe place so it puts me off from using that bus from Glasgow - Citylink.
More space for bikes on trains and buses
Easier to use the car
Hard to fix appropriate timings of connecting transport.
Yes. Cycling from Glasgow would be a bit too far for me at my age and level of fitness. I could use buses in the park but the destinations are not promoted well in terms of accessibility and what to do when you get there. Balloch bus station should do more/better promotion.
Will look into lower carbon options for other trips
Easier to travel by car
No.  Use bus and train.  No issues, but mother says the buses stop running too early in the evening.

Cost
Ease of use for family.
Never see anywhere to cycle safely, wouldn't cycle on roads around the Loch as too busy, need to improve infrastructure to enable more people to do it.
Cost. Multiple changes to get to one place - in car can go direct.
Not doing it in consultation with people who will use them, so often put in wrong places.
Cycling not accessible for everyone, most people have cars.
Main issue is kids being safe on the road - need more infrastructure for kids. Need more here in Balloch streets too narrow to cycle.
Just want to get home after a run or hill walk, don't want to share space with other people. Train not always reliable so safer to bring car.
2x young kids, it's difficult to bring bikes out without a car as can't bring bags and stuff for kids. Would do it more if there were storage lockers people could use at stations or destinations.
Not sure where you could go on train beyond Balloch. Don't feel welcome on trains, told to turn music off or reported for things other people have done.
Public transport not always dog friendly so can't always use it to go out for walks or explore wider area.
Come from Alexandria so they can walk to park easily. It is easy enough to use a bike or bus/train to get around. This is quite weather dependent though. They don't use bike in snow or ice.
Not as visible as car routes when looking for options. 3rd party apps to find places don't show cycle routes. In a car you don't have to share with others. A car is still the easiest option for families. We get the train in to Dalreoch to go to other places but for most places then you need to drive.
Would like to walk around park more but when sunny/busy - intimidating.
No, usually use bus rather than driving.

Anti social behaviour
Time constraints
Time constraints
Maybe for longer journeys
Anti social behaviour
Public transport quite good.
No, usually use the bus rather than driving.
Prefer public transport to active travel because it is more weather-friendly.

**Question 3: What would encourage you to use more active or public transport? - Tell us your public or active transport needs**

More frequent bus services. More Safe Segregated Cycle Routes. Better maintenance of existing Routes. Carriage of bikes on Buses, the trial services you ran several years ago were a great idea, but they should have been extended to the TOP of the Rest & Be Thankful. The trailer used for bike transport was a bit clumsy and too slow to load, but it was a good trial effort and should have been continued.
Improved frequency and affordability of public transport, better connections to key destinations, integration with DRT and other modes, bike carriage on public transport. Improved information and service provision at key transport nodes. Better provision of safe cycling, walking and wheeling routes between communities. Measures to reduce traffic volume and speed on connecting routes
For an event, would come by train to LLS/Balloch by train (Don't drive)
Better bus service Prefer bus to train
Not enough public transport Better routes Better services

Easy obvious information

Put up signs in car park saying 'Next time, be greener and come by bus or train'

Avoid parking problems

Use the bus

More reliable, dependable services

Would use train more often if the service was a wider network.

Flat rate for 10 miles. Would use train more if flat rate was extended - more miles. How many miles are between stations?

More space for bikes on trains and buses

Reliability?

More regular services and/or direct routes. (particularly across rural areas)

Better bus service

Better bus service marketing.

More guided bus service like Loch Lomond Leisure - makes it easy and accessible and shows what I could do on my bike - gives confidence.

Apps and website info

Having visited now, we'll bring our bikes next time!!

Bike - routes easier to follow and safe

The VOLT cycle hub gets everyone cycling. We should have more of these fantastic resources.

More experience of hubs.

Only stay in Anniesland so would consider train if it was more visible that there is a direct route to Balloch.

Make buses free for everyone.

Tell me where I can go other than Balloch.

Would like to go to Luss on bus as never finding parking there but didn't know there was a bus.

Better links to other places like Duck Bay, not just Balloch.

Where is the infrastructure, we need to make it plain so people know about them and use them.

How many electric chargers are there in Lomond Shores? Need to be more visible so people know they can charge car here.

Needs more signage and marketing - rebranding Balloch station as gateway to NP to help encourage people to take train here.

Hard to take a bike on a train. Need more bike capacity - taken by wheelchairs.

Need more space for bags.

More wheelchair spaces.

Support for disabled users.

Accessible destinations for disabled people better signposted online.

Need to be more child-friendly e.g. working toilets on trains or changing rooms. More spaces on trains for bikes.

Show where else you can go and what you can do there - e.g. itineraries and facilities near train stations.

Cost - make it cheaper.

Access for pets.

Make it easier for people.

<p>Swedish infrastructure is amazing.  There is still a stigma of using buses XXXXXXXXXX  They really like measures to bring bus travel prices down for young people - should be free for all.  Need better and more cycle paths.  Better infrastructure still needed for cyclists.</p>
<p>Price - make it cheaper for people.  Marketing - make public transport options more visible. Need better infrastructure for cyclists like more spaces for bikes on trains or buses.</p>
<p>More enforcement/monitoring of bad behaviour.</p>
<p>More frequent buses needed.  Better connections within park so you can pick up bus to other locations e.g. Arrochar.</p>
<p>More flexible timetable  More frequent  Balmaha - couldn't get on bus, had to get a lift</p>
<p>More flexible timetable  More frequent  Balmaha - couldn't get on bus, had to get a lift</p>
<p>Less expensive</p>
<p>Price.</p>
<p>More consistency.</p>
<p>More frequent buses needed.  Better connections within park so you can pick up bus to other locations e.g. Arrochar.</p>

**Question 4: Do you have any comments or ideas for how we can help to provide low-carbon transport for everyone? - Tell us your public or active transport needs**

Seasonal bike hire at a Balloch Transport Hub

Bike/Bus Transport

Waterbus service on Loch Lomond

Increase the frequency of public transport that integrates with other modes, providing more opportunities for those with concessionary travel passes to use them. Create an affordable for others who don't receive a concessionary pass. Improve access to transport nodes for those with limited mobility and wheelchair users. Provide access to shared transport options at an appropriate price point for all in particular access to e-bikes, e-cargo bikes and e-assist mobility aids.

Tell everyone to come by bike:

Relaxing

See more

Meet other people - it's sociable.

Already have a free bus pass. Nothing would make me use the bus more. I don't drive so I only use bus when there's no one to give me a lift in their car.

A better more regular bus service.

Better disabled access - how can you fit your wheelchair in? Bad for walkers and walking aids

Under 21s are free on buses; 60+ are free - please extend cheaper rates for all transport.

Sponsored bikes at car parks around the national park?

This event let me try out a bike instead of buying one.

Promote Ease + health: 'Arrive by bus + thrive by bike'

Cycling hubs and clubs

Please extend flat rate of train fares to a wider area than just Strathclyde.

More bike infrastructure

More cycle paths

Competition - encouraging cycling
Pump track - kids
Limited number of cars per household
Free bus service once you arrive in the Park.  Free train one day a week from Glasgow to Tarbet or Tyndrum or a non-stop train that's free to Balloch e.g. leaves Queen St at 10am and departs Balloch at 4pm.
All love using the boats - whole family come and get around the loch's islands.
Better marketing of cycling hubs.
Cheaper bus/train for families, not just children.  More frequent and reliable services to encourage more people to leave car at home.
Family discounts on public transport.  More reliable and affordable.
Would want to go electric for car but infrastructure not yet good enough - would only consider hybrid.  Fast chargers not good enough and see too many people queuing to use them. People also penalised for staying too long at chargers.  Can't do hills to get the bus. Used to commute in and out of work on ebike but car is still easier.  Pandemic puts off travelling.  Operators need to work together to make water in Helensburgh-Kilcreggan ferry used but still need routes that make sense on water.  Get bus pass to make people use bus.  Traffic free cycle paths in NP.  Weather dependent volunteer driven buses - used well in other places.

<p>Not useful for family with picnics as too many bags.</p> <p>It is cheaper now kids can get free buses but still too expensive for families.</p> <p>Need to make it clear how easy it is to get other links - interlinked systems.</p> <p>Want to hear more stories - to encourage people e.g. itineraries.</p>
<p>Encourage cycle somewhere and take bikes back on train. Need facility for kids of all ages on trains. Trains need to be more bike friendly.</p>
<p>Should be for everyone including disabled people.</p>
<p>More reliable. More frequent - not 1 train every 30 minutes.</p>
<p>Need to just make rules and interventions instead of giving people a choice. Make it compulsory to use public transport if not using an EV. Need better infrastructure in Balloch for bikes and EV charging points. Free train fare if you have a bike to get to your onward destination.</p>
<p>Show the benefit of it. People will do the right thing if you tell them now to reduce their emissions.</p>
<p>Charging points for e-vehicles.</p> <p>Lightning cycle path.</p>
<p>Ban car use unless there are more than 1-2 people in the car.</p> <p>Pay a toll for using car if not electric.</p>
<p>More regulation of behaviour</p>
<p>Cheaper</p>
<p>Cheaper</p>
<p>Expense Bike hire - travel around the park More cycle lanes</p>
<p>More regulation of behaviour</p>
<p>Cheaper.</p>
<p>More cycle paths.</p>

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