

Local Development Plan – Draft Topic Paper

Biodiversity, Natural Places, and Forestry, Woodland and Trees

May 2025

Introduction

Thanks for taking an interest in this Topic Paper, which is part of the evidence we're drawing together for our new Local Development Plan. The following notes explain what the Topic Papers cover and how these fit into the process to prepare the new Plan. At the bottom of the notes, you will find a list of guidance and information should you wish further details.

What is a Topic Paper?

The first stage in preparing a new Local Development Plan is the evidence gathering stage, which is the stage we are currently in. This involves collating information on key relevant policies, strategies and data for an Evidence Report which the National Park Authority has to submit to the Scottish Government for a review that is called a 'gate check'. This to ensure that sufficient information is available to start preparing a new Local Development Plan. The next step, after the gate check, is preparing a Proposed Plan which will set out policies, proposals and priorities which will be formally issued for a period of consultation.

To break the gathered evidence up into manageable blocks, we have created 10 Topic Papers by grouping the most closely related national planning policies of NPF4 (see Table below). Each of these 10 Topic Papers aim to summarise relevant national, regional and local evidence and information for the given topic area. Whilst we have grouped these national planning policies into 10 Topic Papers we fully acknowledge that there are overlaps and linkages between these policies; for example, matters such as climate, nature, and flooding are of relevance to all of the topic areas. We have aimed to highlight these links, where explicit, in the Topic Papers.

How are the Topic Papers structured?

The Topic Papers cover all National Planning Framework 4's policies, as summarised in the table below.

Topic paper 1: Climate and Land Use	Topic paper 2: Biodiversity, Natural Places, and Forestry, Woodland and Trees	Topic paper 3: Infrastructure First	Topic paper 4: Flooding, Water Management and Blue and Green infrastructure	Topic paper 5: Energy, and Heat and Cooling
 Tackling the Climate and Nature Crisis Climate Mitigation and Adaptation Soils Coastal Development Land Use 	3. Biodiversity4. Natural Places6. Forestry, Woodland and Trees	18. Infrastructure First 24. Digital Infrastructure	22. Flood Risk and Water Management 20. Blue and Green Infrastructure	11. Energy 19. Heat and Cooling
Topic paper 6: Sustainable Transport	Topic paper 7: Housing	Topic paper 8: Living Well Locally	Topic paper 9: Cultural Heritage and Place	Topic paper 10: Rural Economy
13. Sustainable Transport	16. Quality Homes 17. Rural Homes	23. Health and Safety	14. Design, Quality and Place 7. Historic Assets and Places 31. Culture and Creativity	29. Rural Development 30. Tourism 28. Retail 27. City, town, local and commercial centres 26. Business and Industry 32. Aquaculture 33. Minerals 25. Community Wealth Building

Each of the Topic Papers has the same format, as follows:

- List of the relevant sections of the Planning Act (and any other relevant legislation and statutory requirements);
- Links to the Evidence that informs that Topic Paper;
- Context of National Planning Framework 4 (NPF4) and the National Park Partnership Plan (NPPP)
- Summary of the selected Evidence for that Topic Paper;
- Implications that the Evidence presents for the preparation of the new Local Development Plan.

Additional sections in the Papers (i.e. Summary of Stakeholder Engagement & Statement of Agreement/Dispute) will be added upon the completion of this engagement phase and prior to the completion of the Evidence Report and its submission to Scottish Government.

It is important to note that the Topic Papers do not present any proposals—such as proposed sites for development. As these Papers are technical and follow a structure and template required by the Scottish Government, an additional 6 Area Summaries have also been prepared. These are separate map-based reports which have been designed to provide a summary of how this technical content relates to different areas of the National Park, for the series of in-person workshops during May and June. These also include a summary of the Local Place Plans prepared by communities, which the majority of communities have either prepared or are under preparation. While these reports will be primarily be used at in-person workshops, they will also included on the website if you would prefer to feedback on those.

The Topic Papers are engagement drafts, these are not the final ones that we will include within our Evidence Report. The Topic Papers have been prepared by National Park staff with advice and comments incorporated where possible from public bodies such as SEPA, Historic Environment Scotland, NatureScot, Transport Scotland and the Councils that cover the National Park. Where data or information has not been available, incomplete or is currently in the process of being finalised, this has been highlighted in the Topic Paper and where relevant this will be actioned for the final versions for the Evidence Report.

We are now sharing the Topic Papers with wider stakeholders who would like to review and provide us with feedback, helping us to identify any gaps or pieces of evidence we should also consider for the Evidence Report. This feedback can be given by filling in the survey available on our website.

The Topic Papers are technical and present a lot of information. This is due to their nature as baseline information to be reviewed by Scottish Government, as the foundation for the new Local Development Plan. We have also created shorter map-based summaries for different areas of the Park to be more accessible, as introduced above.

Feedback will help finalise the Topic Papers. Once we have completed the 8-week engagement period, we will review all the responses we have received. We will make changes to the Topic Papers where required and collate these into the full Evidence Report, which will also summarise the outcomes of our engagement. It is this full – finalised - Evidence Report that the Park Authority Board will need to approve before it can be submitted to the Scottish Government for review at the 'gate check'.

Next stage. Once we have received Scottish Government's feedback on whether we can either proceed or need to amend the Report the next stage is preparing the Proposed Plan (draft Local Development Plan). As noted already, there will be formal public consultation on the Proposed Plan.

Further information

Scottish Government's Guidance on preparing a Local Development Plan

National Planning Framework 4

Loch Lomond and the Trossachs National Park Development Plan Scheme

Contact

If you need help with any of the above or have queries on the Topic Papers, please contact <u>localdevplan2@lochlomond-trossachs.org</u> or call us on 01389 722600.

Issue: Topic/Place	Topic Paper 2 – Biodiversity, Natural Places, and Forestry, Woodland and Trees
Information required by	Policy 3 Biodiversity - Town and Country Planning (Scotland) (Act) 1997, as amended,
the Act regarding	 Section 15 (5): The principle physical and environmental characteristics of the district. Policy 4 Natural Places - Town and Country Planning (Scotland) (Act) 1997, as amended,
the issue addressed in	Section 15 (5): The principle physical and environmental characteristics of the district.
this section	 Policy 6 Forestry, Woodland and Trees - Town and Country Planning (Scotland) (Act) 1997, as amended, Section 15 (5): The principle physical and environmental characteristics of the district.
	Other Relevant Legislation
	 The Conservation (Natural Habitats, &c.) Regulations 1994: European Sites - Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) Convention on Wetlands of International Importance: Ramsar sites
	 The National Parks (Scotland) Act 2000: National Parks and aims The Town and Country Planning (National Scenic Areas) (Scotland) Designation Directions 2010: National Scenic Areas
	 Wildlife and Countryside Act 1981, as amended: Sites of Special Scientific Interest and National Nature Reserves National Parks and Access to the Countryside Act 1949 as amended: National Nature Reserves
	- Italional Falko and Access to the Country olde For 1040 as amended. Italional Mature Reserves

Other Statutory Requirements

- Strategic Environmental Assessment (SEA) Environmental Report a requirement on the preparation of a Local Development Plan
- Biodiversity Duty Report an organisational requirement on the National Park Authority
- Habitats Regulations Appraisal (HRA) a requirement on the preparation of a Local Development Plan
- Forest and Woodland Strategy

Links to Evidence

Links to Policies, Strategies and Reports

National

- Edinburgh Declaration on post-2020 biodiversity framework
- Scottish Biodiversity Strategy to 2045
- Scottish Biodiversity Delivery Plan 2024 to 2030
- Scottish Government Draft Planning Guidance: Biodiversity 2023
- Scotland's Forestry Strategy
- UK Forestry Standard
- The Scottish Government's Policy on Control of Woodland Removal
- Scottish Forestry Phytophthora ramorum Action Plan (Revised July 2022)
- Scotland's National Peatland Plan: Working for our future
- State of Nature Scotland Report 2023 (2023)
- Scotland's Natural Capital Asset Index 2025 (data to 2022)

Regional/National Park

- National Park Partnership Plan 2024 2029
- National Park Future Nature Route Map
- National Park Trees and Woodland Strategy
- Forth Climate Forest
- Tree Preservation Orders in the National Park

- The Special Landscape Qualities of the Loch Lomond and The Trossachs National Park
- Guidance for Assessment of Effects on Special Landscape Qualities
- National Park Peatland Action Delivery Programme 2024 2030
- National Park State of Nature Report 2023
- National Park Biodiversity Duty Report 2021 2023
- Condition of Protected Nature Sites

<u>Local</u>

National Park Strathard Framework

Links to Existing Data

NatureScot - https://opendata.nature.scot/

NatureScot Protected Areas

- Sites of Special Scientific Interest
- Special Protection Area
- Special Areas of Conservation
- Ramsar Wetlands of International Importance
- National Nature Reserves
- Marine Protected Areas (Nature Conservation)
- Geological Conservation Review Sites
- Country Parks
- 30 x 30 Dissolved Protected Areas

NatureScot Habitats and Species

- Ancient Woodland Inventory
- HabMoS EUNIS Base layer
- CSGN IHN Woodland network
- CSGN IHN Woodland hotspots

- CSGN IHN Wetland network
- CSGN IHN Wetland hotspots
- CSGN IHN Neutral grassland network
- CSGN IHN Neutral grassland hotpots
- CSGN IHN Heathland network
- CSGN IHN Acid grassland network
- HabMoS Mountain Woodland 2023 Wild, relict or remnant
- National Vegetation Classification
- Scotland Land Cover Maps

NatureScot Landscape

- Wild Land Areas 2014
- Landscape Map of Scotland
- Loch Lomond and Trossachs NP LCA
- Landscape Character Assessment
- Special Landscape Qualities report for Loch Lomond and The Trossachs National Park

<u>Scottish Government - https://spatialdata.gov.scot/geonetwork/srv/eng/catalog.search#/metadata/13396739-7602-4428-85fd-95a5d7e208a1</u>

National Scenic Areas

Scottish Forestry - https://open-data-scottishforestry.hub.arcgis.com/

Surveys and inventories

- Native Woodland Survey of Scotland
- National Forest Inventory 2021

Forestry Grant Scheme Target and Eligibility

• FGS Target Woodlands For Riparian Benefits

Tree Health

- Statutory Plant Health Notices Scotland
- Phytophthora ramorum SF Policy Zones

SEPA - https://www.sepa.org.uk/environment/environmental-data/

- Main river and coastal catchments
- River and loch water body nested catchments
- Scottish Wetland inventory
- Water Classification Hub
- RBMP3
- Riparian Vegetation Planting Opportunities
- Recommended Riparian Corridor
- SEPA Flood Risk Management Maps
- Obstacles to Fish Passage

Historic Environment Scotland -

https://portal.historicenvironment.scot/apex/f?p=PORTAL:downloads:::::DATASET:ALL

• Inventory of Historic Gardens and Designed Landscapes

Woodland Trust

Woodland Trust – Ancient Tree Inventory - https://ati.woodlandtrust.org.uk/

Buglife - https://www.buglife.org.uk/our-work/b-lines/

B-Lines

National Park Authority

- Local Gardens and Designed landscapes
- Biodiversity Audit 2012 UKBAP Priority Habitats
- Geodiversity audit 2022

- Geodiversity of the Loch Lomond and The Trossachs National Park: Statement of significance and identification of opportunities - BGS 2007
- Riparian INNS data
- National Park Nature Networks Study 2023
- National Park Wildness Study Report

National Biodiversity Network Atlas Scotland - https://scotland.nbnatlas.org/

We acknowledge that these are working drafts currently, and we are sourcing further information on this topic. Where applicable we anticipate that this will be available before the gate check.

National Planning Framework 4 (NPF4) Context

Securing positive effects for biodiversity is one of the six statutory outcomes of the National Planning Framework (NPF4) that were introduced by the Planning (Scotland) Act 2019. Improving biodiversity is a cross-cutting theme which runs throughout NPF 4. NPF4 rebalances the planning system so that climate change and nature recovery are primary guiding principles for all plans and decisions. NPF4 strategy and policies support development that helps to secure positive effects for biodiversity.

Part 1 - A National Spatial Strategy for Scotland 2024

The NPF4 spatial strategy identifies that the Loch Lomond and The Trossachs National Park has landscape-scale opportunities to restore and enhance nature and respond to climate change, including through woodland creation and peatland restoration, as well as natural flood risk management alongside other areas of central and northern Highlands of Scotland. More integrated planning and land management offers opportunities to support land use change and reduction of greenhouse gas emissions.

The spatial strategy also highlights the Perthshire Nature Connections Partnership (PNCP), a long-term, nature-based vision for Perth and Kinross that aims to create a distinct connection between the Cairngorms and Loch Lomond and The Trossachs National Parks.

Part 2 - National Planning Policy

This topic paper covers several policy areas related to biodiversity, natural places and forestry, woodland and trees. The individual policies, their intent and anticipated outcomes are summaries below:

Policy 3: Biodiversity – Aims to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. In order to meet this intent, Local Development Plans should protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy. They should also promote nature recovery and nature restoration across the development plan area, including by:

- facilitating the creation of nature networks and strengthening connections between them to support improved ecological connectivity;
- restoring degraded habitats or creating new habitats; and
- incorporating measures to increase biodiversity, including populations of priority species.

Policy 4: Natural places – Aims to protect, restore and enhance natural assets making best use of nature-based solutions. In order to meet this intent, Local Development Plans will identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area. This policy covers the following assets that are relevant to the National Park, European Sites (Special Areas of Conservation and Special Protection Areas), National Park, National Scenic Areas, Sites of Special Scientific Interest, National Nature Reserves, Ramsar sites, Protected Species, and NatureScot Wild Land Areas. Policy 4 also provides specific protection for Local Nature Conservation Sites (LNCS) but there are no LNCS identified within the National Park at present. No explicit protection is given to Geological Conservation Review (GCR) Sites that are not covered by an SSSI designation in NPF4.

Policy 6: Forestry, woodland and trees – Aims to protect and expand forests, woodland and trees. In order to meet this intent, Local Development Plans should identify and protect existing woodland and the potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks. The spatial strategy should identify and set out proposals for forestry, woodlands and trees in the area, including their development, protection and enhancement, resilience to climate change, and the expansion of a range of types to provide multiple benefits. This will be supported and informed by an up-to-date Forestry and Woodland Strategy.

National Park Partnership Plan (NPPP) 2024 – 2029 context

In line with NPF4, tackling the twin nature and climate crises lies at the heart of the National Park Partnership Plan (NPPP) 2024 - 2029. The NPPP recognises that it is not enough to continue to do what has always been done, a step change in approach is required to secure a positive future for the National Park. As a result, this NPPP goes beyond the usual five-year timescale of previous Partnership Plans and includes long-term vision that:

• "By 2045 Loch Lomond & The Trossachs National Park is a thriving place that is nature positive and carbon negative".

Nature positive means that nature loss has been halted and reversed so that nature in the National Park is more abundant. Through the work set out in the Future Nature Route Map (see below), the National Park Authority has committed to ensure the decline in nature has been halted by 2030 and that there is widespread restoration of nature across the National Park by 2040.

The NPPP identifies the following key steps to achieve the goals in the Plan that are relevant to this topic paper:

- Connect nature at landscape scale
- More land managed for nature
- Reduce key pressures on nature
- Invest in nature restoration
- Support more regenerative land use
- Adapt to climate change and restore nature
- Make the best use of land and assets
- Encourage land use that benefits everyone
- Deliver Strategic Development Needs

The NPPP highlights that the preparation of a revised integrated spatial land use and development strategy, through the new Local Development Plan, provides an opportunity to proactively guide new development and infrastructure within the National Park that is more closely aligned to facilitating the land use change required to deliver for climate and nature, while also meeting the needs of those living and working here. Nature recovery can be secured through identifying opportunities for investment in natural capital, strengthening nature networks and enhancing biodiversity on site as part of development delivery. As a result, the NPPP closely aligns with the NPF4 goals in relation to biodiversity, natural assets and trees/woodland.

Summary of Evidence

This topic paper is divided into three sections, each pulling together the relevant obligations, policies and information / datasets which will shape policy in this area for the new Local Development Plan (LDP).

The three policy areas are:

- Policy 3 Biodiversity
- Policy 4 Natural Places
- Policy 6 Forestry, Woodland and Trees

It is also important to acknowledge that there is overlap between this topic paper and NPF4 Policy 1 - Tackling the Climate and Nature Crises, Policy 2 - Climate Mitigation and Adaptation, Policy 5 - Soils, Policy 10 - Coastal Development, Policy 20 - Blue and Green Infrastructure and Policy 22 - Flood Risk and Water Management. However, these policies are explored in more detail in the following papers:

Topic paper 1 - Climate and Land Use

- Policy 1 Tackling the Climate and Nature Crises
- Policy 2 Climate Mitigation and Adaptation
- Policy 5 Soils
- Policy 10 Coastal Development

Topic paper 4 – Flooding, Water Management, Green Blue Infrastructure

- Policy 20 Blue and Green Infrastructure
- Policy 22 Flood Risk and Water Management

Policy 3 and 4 - Biodiversity, Natural Places

National Context

Edinburgh Declaration on post-2020 global biodiversity framework

The National Park Authority is a signatory of the Edinburgh Declaration. This Declaration, which the Scottish Government published in August 2019, is a statement of intent outlining how subnational governments and local authorities will work together to take bold action on tackling loss of biodiversity. It commits to standing with other public bodies to deliver transformative actions on nature by increasing resources and building capacity for nature-based solutions, raising public awareness, working locally with partner bodies and private businesses, and aligning with national plans and strategies.

The Park Authority Board agreed to sign up to the declaration and to use the commitment as a platform for building on the Authority's Conservation and Land Management work and to create a stronger identity and common purpose for all those with a stake in nature in the National Park, through a shared 'Future Nature' route map.

Scotland's Natural Capital Asset Index - 2025 (data to 2022)

The Natural Capital Asset Index (NCAI) is a human-focussed look at how well nature can contribute to people's wellbeing through a range of ecosystem services and ecosystem characteristics. Natural capital is made up of the environmental resources that combine to yield a flow of benefits to people, such as materials (e.g. food and water), regulating services (e.g. climate regulation and air pollution removal) and non-tangible cultural benefits (e.g. aesthetics and recreation).

The main findings of the analysis of the data up to 2022 show that overall, the NCAI has remained stable for 2022 over the short term (2019 to 2022). Over the long term, the NCAI is 2.8 percentage points above the year 2000 baseline. This follows a deterioration in Scotland's natural capital between the 1950s and 1990s.

Between 2019 and 2022, the ability of agriculture and cultivated habitats to contribute to well-being improved. This change is largely driven by a decrease in fertiliser and pesticide use (note: this is measured by weight and not active ingredients)

Woodland natural capital values are increasing, although this is largely driven by an increase in habitat area rather than an improvement in habitat quality. Overall woodland condition is poor. Habitat extent, woodland birds, and certified woodland are driving the increase in woodland natural capital values, overshadowing the overall poor site condition of Scottish woodlands. A back casting exercise was attempted to backdate the Index to 1950 to understand the longer-term trends of natural capital in Scotland. Unfortunately, this exercise could not use the same detail of habitat quality data that has been available since around the year 2000. However, using more coarse datasets it was possible to demonstrate the longer-term trends of natural capital in Scotland. The trend suggests that natural capital was in decline from 1950 to 1990 and efforts to recover natural capital in Scotland still have some way to go to return to historic levels.

Whilst the stabilisation of natural capital over the short-term is welcome, further work is required to address the longer-term decline in natural capital that occurred between 1950 and 1990. It is also important to note that the increase in the area of woodland has masked the overall poor condition of woodland and this emphasises the importance of improving the condition of existing woodland as well as increasing the extent of woodland.

As detailed in the National Park State of Nature Report 2023 below, the National Park is not immune from these trends and the evidence suggests that it will be necessary to protect and restore natural capital in order to address the declines that occurred between 1950 and 1990. In terms of woodland condition, 51% of woodland designated site features within the National Park were classed as being in unfavourable condition based on the Protected Nature Sites data from Scotland's Environment website last updated 11 September 2024.

State of Nature Scotland Report 2023

Produced by NatureScot, the State of Nature Scotland 2023 report is the most precise review of how nature in Scotland is faring. It provides compelling evidence of the twin biodiversity and climate crises.

Scotland's nature has been under pressure and changing for many centuries. The trends in this report span the last 30 to 50 years of reliable data. Scotland ranks amongst those countries where habitats and species have been most depleted by human impacts through history. Since systematic monitoring of 407 species began in 1994, the abundance of those species has declined on average by 15%. While some of these species have seen increases, in the last decade alone 43% have declined.

As a result, the ability of Scotland's environment to provide benefits to people, such as reducing the impacts of extreme weather or removing pollution from our air and water, has declined, with quantified evidence of deterioration going back to 1950. Efforts to recover natural capital in Scotland still have a long way to go to meet the needs of people and nature.

Declines in biodiversity may be driven by the intensive use of our land for agriculture and forestry, overgrazing and the use of our seas for fishing. These impacts are exacerbated by climate change, pollution, inappropriate development, invasive non-natives and disease. However, some species are benefiting from some of these factors, expanding their ranges with climate change or taking advantage of intensively managed habitats. What is clear, is that despite progress to restore ecosystems, save species and move towards nature-friendly land and sea use, Scotland's nature and wider environment continues to decline and degrade. These

national trends are also reflected in the National Park, a more detailed picture of the situation within the National Park can be found in the National Park State of Nature Report 2023 (see below).

Scottish Biodiversity Strategy and Delivery Plan

The Scottish Biodiversity Strategy, prepared by Scottish Government, sets targets for halting biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045. The Scottish Biodiversity Strategy is accompanied and supported by a Delivery Plan which sets out ambitious actions to help deliver important projects such as the delivery and growth of nature networks and the commitment to protect at least 30% of our land and sea for nature by 2030 (30x30). The forthcoming Natural Environment Bill will put in place key legislative changes to restore and protect nature. Securing positive effects for biodiversity, creating and strengthening nature networks and investing in nature-based solutions are some of the key steps needed to respond to the global nature crisis.

Scottish Government Draft Planning Guidance: Biodiversity 2023

The Scottish Government published <u>Biodiversity: Draft Planning Guidance</u> in 2023, setting out the Scottish Ministers' expectations for implementing NPF4 policies which support the cross-cutting NPF4 outcome of 'improving biodiversity'. NatureScot's <u>Developing with Nature Guidance</u> and ongoing work to develop a <u>biodiversity metric for Scotland's planning system</u> also support the delivery of NPF4 Policy 3 and are referenced in the draft Scottish Government guidance. In addition, the National Park Authority recently commissioned consultants to produce guidance on biodiversity enhancement for local developments to help applicants identify *"appropriate measures to conserve, restore and enhance biodiversity"* in line with the requirements of NPF4 Policy 3 and to contribute to the restore nature objectives of the National Park Partnership Plan.

Scotland's National Peatland Plan: Working for our future (2015)

This is Scotland's first National Peatland Plan and it recognises the wide range of benefits provided by healthy peatlands, including a rich biodiversity, good water quality and carbon storage. However, much of our peatland is in poor condition and requires suitable management and, in many areas, restoration.

Managing and restoring our peatlands to get the best we can from them requires a joint approach involving landowners and managers, scientific and technical expertise and appropriate levels of funding, together with the necessary policies and guidance to steer activities in the desired direction.

National Park Context

National Park State of Nature Report 2023

As part of the National Park Authority Future Nature Route Map (see below) a commitment was made to set a clear baseline for the State of Nature in the National Park within the first year of the delivery plan. Assessing an overall State of Nature is complex, requiring assessment of a wide range of factors and indicators. The report therefore pulled together a wide range of sources and analysed datasets in order to give an overview of the baseline for nature in the National Park. It took two points of comparison:

- It looked at datasets which allowed comparison of progress within the National Park over approximately the last ten years
- It also looked at comparisons between the National Park and the rest of Scotland

The National Park is not immune to the global biodiversity crisis and nature is still in trouble here. As a result, the overall assessment of a mixed picture for nature was not a surprise:

- On some indicators the National Park has seen improvements for nature over the last ten years, and again, on some
 measures is doing somewhat better than the rest of Scotland
- However, the report clearly states the context for those positive signs that "although Scotland is renowned for its wonderful wildlife, it is still one of the most nature depleted countries in the world and experiencing major declines in biodiversity: the 2019 Scottish State of Nature report found that 49% of Scottish species have decreased in abundance in the last two decades." And headlines from the 2023 Scotland's State of Nature report, highlighted above, conclude:
 - Scottish wildlife has decreased on average by 15% since 1994
 - Since 1970 the distribution of 47% of flowering plants has decreased
 - o 11% (One in nine) Scottish species are threatened with extinction
 - o 49% Scotland's seabirds have declined by 49% between 1986 and 2019

- In this context it is clear that doing a little better (on some measures) than the rest of Scotland over the last ten years does not match the aspirations to restore nature and deliver a resilient, nature-rich National Park and therefore "although the park may be performing relatively well compared to some benchmarks, it still falls significantly short of the ambitious goals set for a National Park"
- The report highlights in particular Invasive Non-Native Species, peatland erosion and drainage and deer grazing pressure, particularly in wooded areas as major challenges to the State of Nature in the National Park
- It also highlights considerable data gaps which need to be addressed to build as full a picture as possible to steer delivery in the years to come. In particular, key data gaps exist in woodland, peatland analysis, herbivore impact and long-term species monitoring, where open-source national datasets are inconsistently updated and lack contemporary data. Some of these data gaps will be addressed by actions identified in the Scottish Biodiversity Delivery Plan 2024–2030 (e.g. the development of the new Register of Ancient Woodlands and national peatland monitoring framework).

Condition of Protected Nature Sites

8 Special Areas of Conservation (SACs), 2 Special Protection Areas (SPAs), 1 Ramsar site and 56 Sites of Special Scientific Interest (SSSIs) are situated within the National Park. These designated sites host 184 features and, based on the Protected Nature Sites data from Scotland's Environment website last updated 11 September 2024, 129 features were classified as being in favourable condition, 44 were classified as unfavourable, and 9 were classified as recovering. A further 2 features within the National Park had not been assessed. Excluding the 2 features that have not been assessed, 75.8% features within the National Park are in favourable/recovering condition and 24.2% features are in unfavourable condition. These figures are broadly equivalent to the condition of features across Scotland as a whole with 75.3% of features in favourable/maintained condition and 24.7% features in unfavourable condition.

Based on the Protected Nature Sites data from Scotland's Environment website, overgrazing and invasive species were the most common pressures affecting the condition of designated site features within the National Park (see below table for further details of the other pressures that were identified).

Pressure	Number of designated site features affected
Overgrazing	58
Invasive species	51
Recreation/disturban	20
ce	
Undergrazing	18
Water management	16
Forestry operations	12
Other	7
Water quality	6
Agricultural	5
operations	
Trampling	5
Climate change	4
Game/Fisheries	4
management	
Development	2
Grazing – other	2
No proactive	2
management	
Conservation	1
activities	
Extraction	1

Both overgrazing and invasive species are examples of pressures that often require action outside designated site boundaries in order to be adequately addressed. This emphasises the importance of the wider management of land in order to improve the condition of designated sites.

It should be noted that only around half of these features have been assessed by NatureScot within the last 10 years and the results should be treated with a degree of caution as a result. It is understood that a new approach to protected area monitoring is currently being developed by NatureScot.

A Habitats Regulation Appraisal shall be undertaken of the LDP in accordance with the Conservation (Natural Habitats &c) Regulations 1994 (as amended) and NPF4 Policy 4 to address potential impacts on European sites (SACs and SPAs).

National Park Biodiversity Duty Report 2021 – 2023

Under the Nature Conservation (Scotland) Act (2004), all public bodies in Scotland are required to further the conservation of biodiversity when carrying out their responsibilities. The Wildlife and Natural Environment (Scotland) Act (2011) requires public bodies in Scotland to provide a publicly available report, every three years, on the actions which they have taken to meet this biodiversity duty.

The latest report covering the period 2021-23 was finalised in February 2024 and this covers the development and delivery of the National Park Future Nature Strategy which replaced Wild Park as our Biodiversity Strategy in 2023.

In relation to specific planning measures, the report highlights the significant contribution of the National Park Authority Nature and Land Use Team in providing advice to the development management team on approximately 291 planning cases between 2021 and 2023. This advice has secured the implementation of mitigation measures to avoid or minimise impacts on protected species and priority habitats. Where impacts have been unavoidable, suitable compensation and restoration measures have been secured.

The report also highlights that the Park Authority has sought to secure biodiversity enhancement from development in line with the current Local Development Plan and more recently National Planning Framework (NPF) 4. This has included providing substantial input on National, Major, and EIA developments at the application and pre-applications stages to ensure that these proposals deliver significant biodiversity enhancement that will contribute towards the objectives of the National Park Authority Future Nature Route Map. The outcome of this work will be reported in the next Biodiversity Duty Report, and it is anticipated that this will result in a step change in the amount of enhancement delivered by development.

National Park Future Nature Route Map

Future Nature is an ambitious programme, led by the National Park Authority to tackle the effects of the global nature crisis happening here and now in Scotland's first National Park. It aims to stop the decline and restore nature on a large scale.

The Future Nature Route Map was developed in partnership with a number of organisations and it sets out how Loch Lomond & The Trossachs National Park can become an exemplar where people can understand, experience, and contribute towards a shared vision for restoring nature - A resilient nature-rich National Park, where abundant wildlife and a healthy natural environment provide a wealth of benefits through an extensive, well-connected living network.

The Route Map was launched in May 2023 and it echoes the targets of the Scottish Biodiversity Strategy in seeking to reverse the decline in nature in Loch Lomond & The Trossachs National Park by 2030 and the widespread restoration of nature across the National Park by 2040 (5 years earlier than the 2045 target in the SBS).

The Route Map includes 'Nature positive development' as a key workstream with the aim to "Explore enhanced opportunities for the promotion and application of nature based solutions, natural infrastructure, nature networks and 'nature positive development' in new development through the preparation of our new Local Development Plan, ensuring the application of NPF4 reflects the role of the National Park". Embedding Future Nature in the new NPPP and LDP is identified as a specific action in the Route Map.

Three key habitat networks are highlighted in the Route Map, peatland, woodland and water. These habitat networks are mapped at a very high level in the Route Map and this informed Map 3 of the subsequent NPPP (see appendix) which illustrates the main priority areas for nature restoration within the National Park. An important part of the strategy is addressing the key threats to biodiversity within the National Park, such as herbivore pressure, invasive non-native species (INNS), water quality, and climate change. Addressing these key threats is crucial to delivering our objectives of reversing the decline in nature by 2030 and ensuring widespread nature restoration by 2040.

A core element of Future Nature is to work at landscape scale, embedding nature restoration across all the National Park to develop a well-connected living network. Three key landscape scale projects are identified in the Future Nature strategy, The Great Trossachs Forest, Wild Strathfillan and Loch Lomond Rainforest.

• The Great Trossachs Forest is a landscape-scale woodland restoration project involving RSPB, Forestry Commission Scotland and Woodland Trust. In the past 15 years, around 3000ha of woodland has been created through planting and natural regeneration along with INNS control, conservation grazing, deer management and peatland restoration.

More recently funding has been secured from Scottish Water and the other project partners for a Coordinator post to carry out an extensive review of progress so far and plans for the next phase of this flagship landscape partnership.

- Wild Strathfillan is an ambitious nature restoration project across 50,000 hectares of the National Park. The project is led by Loch Lomond and The Trossachs Countryside Trust working with over 30 land managers, community groups, NGOs, local businesses and statutory bodies. This project will build a nature recovery network, helping to restore natural processes and ecological function, creating a healthier, more resilient, and better-connected landscape. Nature will thrive alongside the rural industries that underpin the local community.
- Funding has recently been secured from the Scottish Government Nature Restoration Fund for the Loch Lomond Rainforest project which aims to re-establish a resilient and well-connected temperate rainforest habitat within the Loch Lomond and Trossachs National Park. Led by the National Park's Future Nature Partnership, the £93,600 award will be used to carry out surveys to confirm the extent of rhododendron encroachment and grazing pressures and to devise a plan to tackle these major threats to the rainforest habitat.

In addition to these existing landscape scale projects, the National Park Authority is working alongside Loch Lomond & The Trossachs Countryside Trust and RSPB Scotland to prepare a multi-year National Lottery bid to address shared threats and opportunities across three National Park landscape partnerships: Loch Lomond Rainforest; Wild Strathfillan; The Great Trossachs Forest. Activities to address shared threats and opportunities are being scoped, including invasive non-native species, herbivore pressures, woodland restoration, green economies, green skills & jobs, community benefit, and nature experiences & engagement. These will form part of an 18-month development phase involving further evidence gathering and consultation.

Key Species

The National Park is home to over 300 national priority species¹. Whilst the National Park Authority primarily takes a landscape scale and habitat approach in its delivery and monitoring – some key species are identified as important indicators and targets for specific action.

 $^{^{1}\,\}underline{\text{https://www.lochlomond-trossachs.org/park-authority/publications/biodiversity-habitat-audit/}\\$

Red squirrels

Monitoring and trapping work by Saving Scotland's Red Squirrels shows that the National Park is almost a red only zone – with the exception of Callander and the Loch Lomond Islands. Efforts continue to protect the important red squirrel populations of the National Park by focusing grey control on the National Park boundary, particularly to the south. Squirrelpox has not been confirmed within the National Park but the project continues to monitor the situation in the grey squirrel populations in the surrounding area.

Beavers

Beavers are established and consolidating their presence in the upper Forth & Teith, Earn and Fillan/Dochart catchments, and starting to colonise the Lomond catchment including the first translocation into the National Park being carried out in 2023.

More recently, a further 20 beavers have been released into the Loch Ard Forest by Forestry and Land Scotland (FLS) in partnership with the Beaver Trust. Beavers arrived on FLS sites in the Trossachs through natural dispersal almost 10 years ago and Aberfoyle was naturally colonised by dispersing beavers around two years ago. The releases in Loch Ard Forest help to support and increase this new, naturally expanding population. It also contributes towards the delivery outcomes and overall vision of the Loch Lomond and the Trossachs National Park Partnership Plan of which FLS is a delivery partner.

The population is expected to continue to expand and to continue to undertake wetland ecosystem restoration in the National Park and continued monitoring of their spread and the ecological changes they make is required. The Beaver Mitigation Scheme is in place to assist land managers with any problems that beavers may cause.

<u>Waders</u>

Glen Dochart is one of the best places in the National Park to see farmland wading birds including curlew, lapwing, oystercatcher, and snipe. As a result of their efforts, land managers involved in the Glen Dochart Waders Project saw an 86% increase in the population of breeding waders between 2010 and 2015. The wader population has fluctuated since then and ongoing habitat management is being undertaken by land managers to try to retain the birds at their current levels. Active management for farmland waders is also underway at the RSPB Loch Lomond reserve where these species are currently benefitting.

Black grouse

Black grouse surveys in 2017 and 2018 show estimated number of males at 125 and 121 males respectively with the most important area being around Loch Katrine and The Great Trossachs Forest. Black grouse populations in other parts of the National Park have remained at low levels or have continued to decline despite various management interventions to restore suitable habitat, reduce collisions with deer fences and legal control of predators.

Salmon and brown trout

In the Forth and Teith river catchments within the National Park, salmon continue to have excellent population densities in a very few highly productive tributaries. However, in the upper catchment salmon are struggling to regain their once strong foothold. Historical land use changes, lack of upstream population pressure from the lower river and barriers to migration take a heavy toll on migratory fish species. Without conservation measures in areas such as the nutrient-poor River Larig and the dammed Eas Gobhain, viable populations of salmon are unlikely to persist.

The situation is not quite as bad for brown trout as a species, as there is a component of the population that doesn't migrate. Nevertheless, for those that do migrate, dams prevent them from accessing good quality habitat in the upper reaches of the catchment, and for those that do make it upstream, their offspring are likely to be starved by the lack of vegetation now characterising the upper catchment.

Other notable species

Aside from the species highlighted above, there are a number of notable species present within the National Park that require consideration when devising development proposals. These include species protected by law and those listed on the Scottish Biodiversity List. Depending on the nature and location of proposals, potential impacts on raptors, geese and wading birds; lamprey, freshwater pearl mussels and Atlantic salmon; beaver, red squirrel, pine marten, bats, otter, water vole and badger may need to be considered. The NBN Atlas Scotland is a useful source of species data aggregated from multiple sources that can be used in conjunction with the site characteristics to identify the need for specific survey work, mitigation measures and to inform the design of the proposals to avoid negative impacts and provide enhancement.

Strathard Framework

The Strathard Framework was a pilot project that trialled integrating land use and planning in the Strathard area of the National Park. The Framework was prepared jointly by the Strathard Community Council, the Strathard Community Development Trust, the National Park Authority and Stirling Council. It has been adopted by the National Park Authority as planning guidance and there is a strategic forum which reviews and discusses the delivery action plan. It identifies the development and infrastructure needs for the area alongside opportunities for investment in natural capital such as woodland management/creation and peatland restoration. This approach has helped test and consider how the new LDP could incorporate an integrated spatial land use and development strategy that would deliver better outcomes for nature and climate. These lessons shall be carried forward into the new LDP.

National Park Peatland Action Delivery Programme 2024 – 2030

This document sets out the strategic overview of peatland in the National Park. It then gives the detailed operational plans for the next 1-5 years. It is updated periodically. A detailed annual work plan and budget is agreed each year. Current peatland information held by the National Park Authority is used to provide a strategy that optimises peatland restoration within the National Park from 2024 to 2030.

Around 36.5% (68,000ha) of land within the National Park is covered by peatland and this peatland is estimated to hold up to 20 million tonnes of carbon. Preliminary assessments by the National Park Authority's Peatland ACTION team identified:

- 45,600ha of degraded peatland for which restoration is likely to require changes in land management such as reductions in grazing pressure rather than physical works to the peat.
- 7,054ha of degraded peatland suitable for physical restoration via National Park Authority Peatland ACTION funding, 1,887ha of which has been restored from 2015 to March 2024.
- 800ha of degraded peatland on land under management by Scottish Water (SW) or Forestry and Land Scotland (FLS),
 where scope for restoration will be assessed and delivered where it is practical to do so via their work as Peatland ACTION
 partners. As of July 2024, a feasibility study on restoring 400 ha of peatland in the Loch Katrine water catchment has been
 completed by SW with a further 400 ha being scoped by FLS across the wider National Park area.

The peatland restoration opportunities identified in the Future Nature Route Map and in Maps 1 and 3 of the NPPP (see appendix) have been informed by this assessment work.

Special Landscape Qualities

In 2010 the 'Special Landscape Qualities of the Loch Lomond and the Trossachs National Park' commissioned report identified the qualities that make the landscape and scenery special here, and hence underpin the National Park landscape designation. Special Landscape Qualities are defined as the characteristics that make a designated landscape special in terms of landscape and scenery, both individually or combined. They are qualities that are perceived and experienced by people, affecting the sense of place. This report is a key document in the assessment of planning applications and will be a consideration in the preparation of the new Local Development Plan.

New guidance has been prepared by NatureScot, the Cairngorm National Park Authority and the Loch Lomond and Trossachs National Park Authority which sets out how to assess effects on the Special Landscape Qualities of Scotland's National Scenic Areas and National Parks: *Special Landscape Qualities – Guidance on assessing effects* (2025). This guidance aims to help deliver sympathetic and design led approaches to managing change and development in Loch Lomond and the Trossachs National Park's special landscapes, and provide conclusions on significance of effects for the National Park Authority to inform judgements in relation to planning and land use policies.

Nature Networks

NPF4 defines a Nature Network as "a joined-up system of places important for wild plants and animals, on land and in water. It allows plants, animals, seeds, nutrients and water to move from place to place and enables the natural world to adapt to change, providing plants and animals with places to live, feed and breed. Effectively functioning nature networks will connect existing nature rich areas through habitat corridors, habitat 'stepping stones', or habitat restoration areas".

The National Park Partnership Plan (NPPP) and Future Nature Route Map identify the three key habitat networks within the National Park, peatland, woodland and water/wetland. Map 3 of the NPPP illustrates the priority areas for nature restoration across these habitat types at a strategic scale (see appendix). The peatland restoration and woodland expansion priority areas identified on this map are based on analysis carried out for the National Park Peatland Action Delivery Programme and Trees and Woodland Strategy. The priority areas in Map 3 of the NPPP will form the starting point for identifying a Nature Network for the National Park but other habitats, such as grassland and upland habitats, will also be considered. The network will be refined further through additional analysis and consultation with relevant stakeholders including the Future Nature Operational Group (which oversees the implementation of the Future Nature delivery plan), neighbouring local authorities and wider strategic partnerships that extend into or border the National Park (e.g. Perthshire Nature Connections Partnership, Forth Climate Forest, and Glasgow City Region

Green Network). This will ensure that there is a shared vision and coordinated approach to the delivery of Nature Networks across boundaries.

The table below highlights the key existing datasets that will be used to inform the development of the Nature Network. This includes analysis and mapping that was commissioned by the National Park Authority in 2023 to identify existing Nature Networks and priorities for the enhancement of Nature Networks in the National Park prior to the publication of the NatureScot Nature Networks Framework. The National Park Biodiversity Audit 2012 identified 38 UK Biodiversity Action Plan (BAP) Priority Habitats within the National Park. It is intended that this data will be used to locate high value habitats beyond the three key habitat networks identified in the NPPP and Future Nature Route Map and the need for any further additional survey or assessment work.

Scale & Type	Data
National & International Protected Nature Sites	 Sites of Special Scientific Interest Special Protection Area Special Areas of Conservation Ramsar Wetlands of International Importance National Nature Reserves Marine Protected Areas (Nature Conservation)
Other Protected Areas	 National Scenic Areas Gardens and Designed Landscapes Geological Conservation Review Sites Country Parks

	 National Park Local Garden and Designed Landscapes National Park Geodiversity audit sites - 2022
National – Habitat data & Network Opportunity mapping	 HabMoS EUNIS Base layer – NatureScot National Vegetation Classification - NatureScot Ancient Woodland Inventory - NatureScot Native Woodland Survey of Scotland – Scottish Forestry National Forest Inventory – Scottish Forestry Ancient Tree Inventory - Woodland Trust HabMoS - Mountain Woodland 2023 - Wild, relict or remnant - NatureScot FGS Target Woodlands For Riparian Benefits – Scottish Forestry Nature Network Tool - NatureScot/AECOM RBMP3 Recommended Riparian Corridor – SEPA

	Buglife B-LinesFGS Woodland Creation – Claims
Regional – Habitat data & Network Opportunity Mapping	 National Park Future Nature Route Map National Park Trees and Woodland Strategy National Park Peatland Action Delivery Programme 2024 – 2030 National Park Nature Networks Study 2023 National Park Biodiversity Audit – UKBAP Priority Habitats CSGN 2011 Integrated Habitat Networks – NatureScot Tree Preservation Orders in the National Park Forth Climate Forest Connectivity Mapping
Local - Habitat Network Opportunity Mapping	National Park Strathard Framework

The following data gaps have been identified and will be addressed to assist in the development of the Nature Network.

Data gap	Action
Extent of land managed primarily for biodiversity outside of protected areas	 Confirm extent of NGO managed land that lies outside protected areas and the management objectives for these areas Confirm the areas of UKWAS² certified woodland managed primarily for biodiversity (All FLS woodlands are UKWAS certified)
River catchments outside current range of beavers	 Use the results of the ongoing NatureScot, Beaver Trust and University of St Andrews beaver survey to confirm the current distribution of beavers and determine scope for further expansion.

Habitat Restoration

'Plantations on Ancient Woodland Sites' (PAWS) and 'Nearly-native woodland' identified in the Native Woodland Survey of Scotland are likely to be a focus for native woodland restoration whereas "wild, relict or remnant" mountain woodland identified in the HabMoS - Mountain Woodland 2023 will be a starting point for identifying restoration opportunities for mountain woodland. Areas of visibly degraded peatland, identified as areas of 'broken peat' in the National Park Peatland Action Delivery Programme 2024 – 2030, are priorities for restoration under Peatland ACTION.

Local Nature Conservation Sites

There are no Local Nature Conservation Sites (LNCS) identified within the National Park at present. Efforts to date have focussed on protecting the widespread priority habitats and ecosystems of the National Park rather than identifying LNCS for protection. This approach was considered to be more effective in the context of the National Park.

² A minimum of 15% of UKWAS certified woodland requires to be managed for conservation and enhancement of biodiversity as the primary objective.

Geological sites

No explicit protection is given to Geological Conservation Review (GCR) Sites that are not covered by an SSSI designation in NPF4. There are 11 of these 'un-notified' GCR sites within the National Park along with a further 11 potential sites of geological importance that were assessed as part of a focussed audit in 2022.

Policy 6 - Forestry, woodland and trees

National Context

UK Forestry Standard (5th edition 2023)

The (5th) edition of the UK Forestry Standard (UKFS) was published in 2023. It is the technical standard for forestry across the UK, providing the foundation for sustainable forest management. Endorsed by all UK governments, the UKFS balances environmental, economic, and social objectives.

The standard sets out the approach of the UK governments to sustainable forest management by defining requirements and guidelines and providing a basis for regulation and monitoring – including national and international reporting. The standard ensures that international agreements and conventions on areas such as sustainable forest management, climate change, biodiversity and the protection of water resources are applied in the UK.

Scottish Forestry is the main body responsible for implementing the UKFS in Scotland and assesses forestry proposals against the UKFS before giving approval and undertakes checks to ensure woodland owners and managers comply with forestry regulations.

Scotland's Forestry Strategy 2019–2029

The strategy vision is that:

"In 2070, Scotland will have more forests and woodlands, sustainably managed and better integrated with other land uses. These will provide a more resilient, adaptable resource, with greater natural capital value, that supports a strong economy, a thriving environment, and healthy and flourishing communities".

More specifically, the strategy aims to increase forest and woodland cover to 21% of the total area of Scotland by 2032 and to increase the use of Scotlish wood products in construction from 2.2 million m³ in 2018 to 3 million m³ by 2031/32. With regards to native woodland, the strategy included the following aims:

- Increase the amount of native woodland in good condition
- Create 3000–5000 ha of new native woodland per year
- Restore approximately 10 000 ha of new native woodland into satisfactory condition in partnership with private woodland owners through Deer Management Plans
- Ensure protected sites are under good conservation management

The National Park Authority Trees and Woodland Strategy guides the local implementation of Scotland's Forestry Strategy (see below for further information) and the NPPP includes a target to double the average annual rate of woodland expansion from 200ha year to 400ha, focusing on priority areas.

As highlighted above, woodland will form a key component of the National Park Nature Network.

The Scottish Government's Policy on Control of Woodland Removal

Woodland removal is defined as the permanent removal of woodland for the purposes of conversion to another type of land use. It does not include the removal of trees associated with the internal re-design of woodlands to meet the UK Forestry Standard.

In Scotland, climate change and human activities such as housing or wind farm developments has led to extensive woodland removal. To support and add to Scotland's forests and woodland resources, inappropriate woodland loss needs to be stopped.

The Scottish Government's policy on control of woodland removal gives direction for decisions on woodland removal in Scotland. Guidance on how to apply the Scottish Government's policy on control of woodland removal has been published by Scottish Forestry. The guidance applies to both consenting authorities and applicants.

This policy underpins NPF4 Policy 6 which states that "Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered".

Tree Health

The threat to our trees from pests and diseases is growing. Climate change, global travel and imported plants and wood can increase pests and diseases and their impacts. In the National Park, there have been outbreaks of various *Phytophthora* and ash dieback is now established. In addition, the risk of introducing *Dothistroma* needle blight (DNB) to Caledonian pinewoods restricts the planting of Scots pine within 600m of Caledonian pinewood sites within the National Park. Further threats are likely to emerge in future years. The National Park Authority manages tree health issues in line with Scottish Forestry guidance and associated legislation.

Scottish Forestry *Phytophthora ramorum* Action Plan (Revised July 2022)

Phytophthora ramorum (P. ramorum) was first found in Scottish plant nurseries in 2002 and in gardens and parks in 2007. The first infection on Scottish larch trees was confirmed in 2010. P. ramorum is capable of causing extensive mortality in larch trees, particularly in the wetter west of Scotland. It is currently the biggest threat to trees in Scotland. There is no cure for P. ramorum and it is nearly impossible to remove from an area once it takes hold. The only thing that can be done to try and slow the spread of the disease is felling the infected trees and those around them.

P. ramorum is regulated under the retained EU Plant Health Regulation 2016/2031, the retained EU Phytosanitary Conditions Regulation 2019/2072 and the retained EU Commission Decision 2002/757. Retained EU plant health legislation is implemented in Scotland by the Plant Health (Official Controls and Miscellaneous Provisions) (Scotland) Regulations 2019. Official controls include the use of Statutory Plant Health Notices (SPHNs) requiring the felling of infected larch by landowners by a specified date.

Between 2018 and 2021, in large parts of southern and western Scotland, particularly in Dumfriesshire and parts of the Cowal peninsula, infection levels had reached a scale where the necessary actions from ground surveys through to forest operations, that would be required to control local outbreaks, was greater than the capacity of the local resources of the sector to deliver on the swift timescales required for successful control of local infections. Such areas are identified as the Risk Reduction Zone in the Action Plan. The aim in this zone, where *P. ramorum* is now considered endemic, is to reduce the risk of *P. ramorum* to the sector. Statutory actions in the form of SPHNs continue to be used as the main tool to ensure consistency of control efforts across the range of land ownerships. Within the National Park, Cowal is situated within the Risk Reduction Zone.

The remainder of the National Park lies within the Priority Action Zone identified in the Action Plan. Actions within this zone will have the greatest impact on controlling spread of *P. ramorum*. Outbreaks to date have been limited in scale and control efforts have been successful at eradicating infections on larch. Prioritisation of survey and regulatory efforts will ensure Statutory Plant

Health Notices (SPHNs) are issued quickly, with felling needed, wherever possible, before the end of August in the year it was found. In recent years, *P. ramorum* infections have been identified on the eastern side of the National Park (e.g. around Callender and Loch Lubnaig) and SPHNs issued to address outbreaks. FLS are undertaking extensive felling of uninfected larch within the Priority Action Zone as part of the effort to maintain a 'firebreak' in front of the leading edge of the *P. ramorum* infections.

It should be noted that due to the difficulties of terrain, topography and risk of windblow, it is not always possible to fell larch (whether via SPHN or not) in isolation; often adjacent crops must be felled to facilitate access or to avoid windthrow which would occur once the larch is removed. As a result, several FLS-owned forests are going through significant short-term restructuring which had not been foreseen when Land Management Plans (even relatively recent ones) were produced.

The need to fell larch trees infected with *Phytophthora ramorum* and reduce the risk of further spread is driving significant forest restructuring in the west of the Park, with a range of impacts and considerations – landscape, ecology, drainage and operational implications for forestry works. Some are short term and others are longer term.

Ash dieback

Ash dieback is a serious disease of ash trees caused by a fungus called *Hymenoscyphus fraxineus* (previously called *Chalara fraxinea*). The disease causes leaf loss and crown dieback and is usually fatal in younger trees whereas mortality in older trees is more often associated with the combined impact of root pathogens such as the honey fungus (*Armillaria mellea*). Ash dieback caused widespread damage to ash populations across Europe, and was first discovered in the UK in a Buckinghamshire nursery in February 2012.

Ash dieback is present across Scotland including the National Park. Management efforts now focus on mitigating safety risks from diseased trees, while allowing for natural regeneration of potentially disease-tolerant or resistant trees wherever possible.

National Park Context

National Park Authority Trees and Woodland Strategy 2019 – 2039

The Town and Country Planning (Scotland) Act 1997 requires the National Park Authority to prepare a Forestry and Woodland Strategy which sets out policies and proposals for the development of forestry and woodlands.

The National Park Authority Trees and Woodland Strategy 2019 – 2039 sets out our vision for how trees and woodlands in Loch Lomond & The Trossachs National Park are to be protected and enhanced over the next 20 years. The strategy guides woodland enhancement and creation within the National Park to help meet important local and national targets that will deliver wider social and economic benefits, such as increasing the number of forestry sector jobs and encouraging community management or ownership of woodland.

There are seven strategic objectives in the Strategy:

- Increasing woodland cover to help tackle biodiversity loss and the global climate emergency.
- Improving woodland condition and diversifying woodland management.
- Protecting and enhancing the landscape.
- Maintaining and enhancing economic sustainability through forestry-related skills and business development.
- Promoting cooperative woodland management and creation as part of an integrated land management approach.
- Improving community empowerment and resilience through active engagement in woodland management.
- Encouraging and promoting public access to woodlands for recreation and improving people's quality of life.

The strategy is a key document to be used by landowners, land managers, residents and forestry professionals when formulating forestry proposals in the National Park.

As part of the Strategy, a spatial analysis was undertaken to identify Preferred and Potential area for native woodland creation. Preferred Areas are where native woodland creation would have the greatest impact in improving woodland connectivity, providing a more suitable climate for tree growth and contributing to expansion of the woodland resource in the Bryophyte Important Plant Areas. Potential Areas are those where native woodland creation would contribute to the wider strategy's objectives. Sensitive Areas with limited capacity for native woodland creation due to higher value nature conservation or landscape objectives were also identified as part of this exercise.

This analysis formed the basis of the native woodland creation opportunities illustrated in Map 2 of the NPPP and woodland expansion priority areas shown in Map 3 of the NPPP (see appendix). This analysis will also be the starting point for identifying the native woodland creation component of the Nature Network for the National Park.

NPF4 Policy 6 (d) protects "land identified in the Forestry and Woodland Strategy as being suitable for woodland creation" and proposals "will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design".

Forth Climate Forest

The Forth Climate Forest (FCF) Initiative was created in response to the Climate and Ecological Emergencies, with its overarching purpose being to help deliver a substantial increase in tree planting across the Forth Valley Area. The FCF was developed as a partnership initiative, with the key partners being Woodland Trust, University of Stirling, Scottish Forestry, Clackmannanshire Council, Falkirk Council, Stirling Council, and Loch Lomond and the Trossachs National Park Authority.

The initiative aligns closely with a number of national and local strategies and policies, such as the National Planning Framework 4, Forest and Woodland Strategies and Biodiversity Strategies. In particular, FCF provides a means to deliver the requirements of NPF4, by:

- Protecting and expanding forests, woodlands and trees.
- Protecting biodiversity, reversing biodiversity loss, delivering positive effects from development and strengthening nature networks.

The FCF will also create opportunities for the partner organisations to:

- Deliver their economic, social and environmental aims.
- Make the Forth Valley Area more resilient to the impacts of a changing climate, helping to achieve 'Net Zero,' and repairing our damaged ecosystems and adapting the built environment to create more liveable places for the future.

The National Park Authority is a signatory of the Forth Climate Forest Concordat which includes a commitment to "Ensure the FCF is integrated and trees are embedded, as appropriate, into development plans, development frameworks, masterplans, design briefs along with corporate policy and investment documents".

Tree Preservation Orders in the National Park

A Tree Preservation Order (TPO) affords a tree, a group of trees or a woodland protection from felling or any other works i.e. removal of branches etc. unless prior formal consent for the felling or tree works has been granted by the National Park Authority.

The National Park Authority maintains an up-to-date register of Tree Preservation Orders (TPOs) within the Park. A review of TPOs is ongoing and the register will be updated accordingly. There are currently 37 TPOs in place across the National Park.

Summary of Stakeholder Engagement

This section will be completed following the end of the engagement period and prior to inclusion in the final Evidence Report.

Summary of Implication for the Proposed Plan

As highlighted above, 'inappropriate development' is identified as an exacerbating factor contributing to declining biodiversity in Scotland in the State of Nature Report (2023). Whilst the National Park State of Nature Report 2023 recognises that the National Park has seen some improvements for nature over the last ten years and, on some measures, the National Park is doing somewhat better than the rest of Scotland, this does not match the ambition of the National Park Partnership Plan to halt the decline in nature by 2030 and ensuring widespread nature restoration by 2040 or the equivalent Scottish Biodiversity Strategy targets for halting biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045.

Bold action is required to accelerate and up-scale efforts to increase nature recovery in order to meet these ambitious targets for protecting and restoring biodiversity. The planning system has a critical contribution to make towards achieving this and this is recognised in NPF4 which seeks to protect, conserve, restore and enhance biodiversity, natural assets, trees and woodland whilst facilitating the creation of nature networks to improve ecological connectivity between these assets. This may mean working differently, including taking an integrated approach to development and land use, and will require concerted action from all parties to halt the loss of biodiversity by 2030 and restore and regenerate biodiversity by 2045.

The implications of the evidence for the new Local Development Plan (LDP) may be summarised as follows:

Policy 3 Biodiversity

In order to halt the loss of biodiversity by 2030 and promote the restoration biodiversity by 2040/2045 in line with the targets of the NPPP, Future Nature Route Map and Scottish Biodiversity Strategy:

• The National Park Authority shall continue to protect and enhance biodiversity in line with the requirements of NPF4 Policy 3 and relevant inter-related policies when determining planning applications.

This will include the use of the Scottish Government's Draft Planning Guidance: Biodiversity 2023 and NatureScot's Developing with Nature Guidance to assess applications.

- The spatial strategy of the new LDP shall protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy by steering development away from key assets, promoting the restoration of degraded habitats and improving connectivity between nature rich areas. This principle shall underpin the assessment and selection of sites in the new LDP.
- A Nature Network for the National Park should be identified in the LDP and this will incorporate the three key habitat networks identified in the NPPP and Future Nature Route Map namely peatland, woodland and water/wetland. The priority areas for nature restoration identified in Map 3 of the NPPP (see appendix) will form the starting point for identifying a Nature Network but this will be refined further through additional analysis and consultation with relevant stakeholders including the Future Nature Operational Group (which oversees the implementation of the Future Nature delivery plan) and neighbouring local authorities. This will help to facilitate better connections between nature rich areas by establishing and growing nature networks. The Nature Network shall be a key component of the spatial strategy of the new LDP and it will inform the assessment and selection of sites.
- The new LDP should be supported by guidance for local developments to help applicants identify the most appropriate biodiversity enhancement measures that would deliver most for nature in the National Park and contribute to the restore nature objectives of the National Park Partnership Plan.
- The new LDP should secure significant biodiversity enhancement from national/major/EIA developments through the use of best practice assessment methods including the Scottish biodiversity metric that is currently being developed by NatureScot.

Policy 4 Natural places

In order to protect, restore and enhance natural assets whilst facilitating the creation of Nature Networks to improve ecological connectivity between these assets:

• The National Park Authority will continue to protect locally, regionally, nationally and internationally important natural assets in line with the requirements of the underpinning legislation and by considering the objectives of these designations in planning decisions. This includes the use of the recently published *Special Landscape Qualities - Guidance on assessing effects* (2025) to ensure that the objectives of the National Park designation are not compromised.

- The spatial strategy of the new LDP should safeguard the objectives of locally, regionally, nationally and internationally important natural assets by steering development away from key assets and facilitating better connections between nature rich areas by establishing and growing nature networks. This includes consideration of priority species protected by law and those listed on the Scottish Biodiversity List. The spatial strategy shall also promote land use priorities including the restoration and enhancement of nature by identifying native woodland creation/restoration, peatland restoration and river/wetland restoration opportunities as well as the key threats that require to be tackled at a strategic scale (e.g. herbivore pressure, invasive non-native species and water quality).
- A Habitats Regulation Appraisal is required to be undertaken of the new LDP in accordance with the Conservation (Natural Habitats &c) Regulations 1994 (as amended) and NPF4 Policy 4 to address potential impacts on European sites (SACs and SPAs).
- Further consideration will be required to determine how 'un-notified' GCR sites and those assessed as part of the 2022 audit will be addressed in the new LDP. Options include incorporating these sites into the Nature Network.
- Consider whether identifying Local Nature Conservation Sites for protection in the new LDP would be more effective than the current approach of protecting the widespread priority habitats and ecosystems of the National Park.

Policy 6 Forestry, woodland and trees

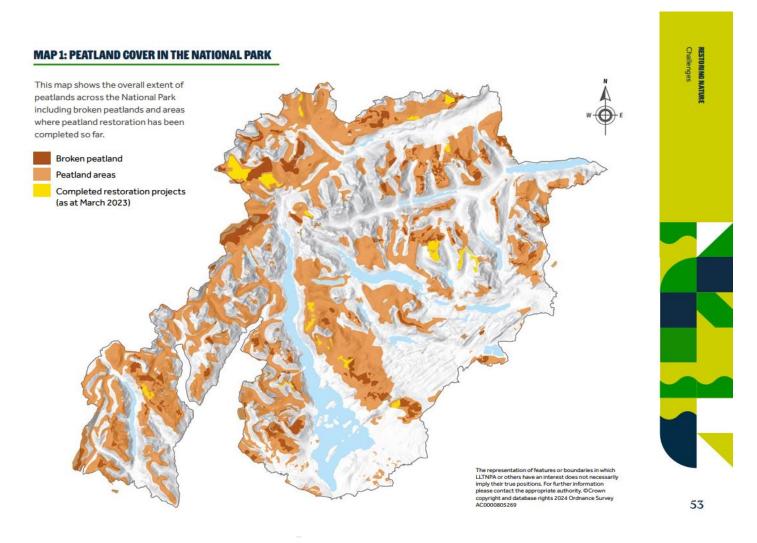
- The National Park Authority shall continue to protect trees and existing woodland in line with the requirements of NPF4 Policy 6 and Scottish Government policy on woodland removal when determining planning applications.
- The spatial strategy of the new LDP should consider identifying existing trees and woodland for protection, focussing on those given strong protection under NPF4 Policy 6 including ancient woodland, ancient and veteran trees, and native woodlands, hedgerows and individual trees of high biodiversity value. Opportunities to restore, expand and improve woodland connectivity will be identified as part of the Nature Network. The analysis caried out for the National Park Trees and Woodland Strategy and the subsequent opportunities identified in the strategy and NPPP will be the starting point for identifying the native woodland creation component of the Nature Network for the National Park.
- Further consideration will be given to whether it is necessary to update the existing National Park Authority Trees and Woodland Strategy 2019 – 2039.

Statements of Agreement / Dispute

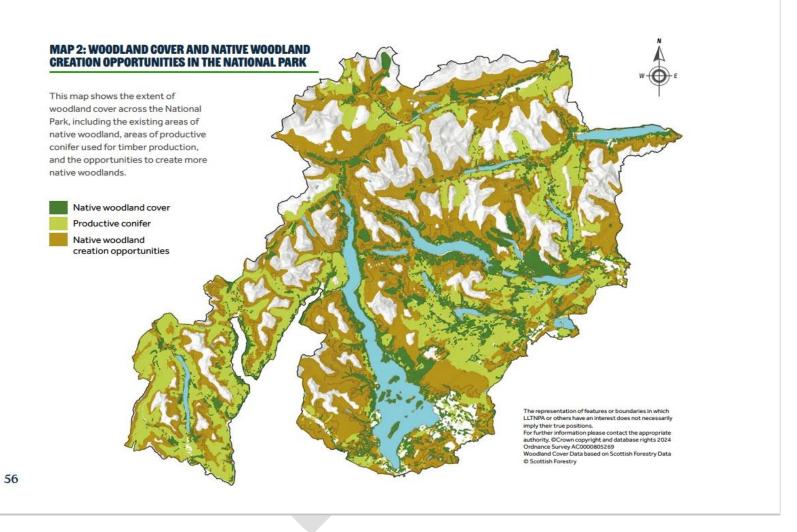
This section will be completed following the end of the engagement period and prior to inclusion in the final Evidence Report.



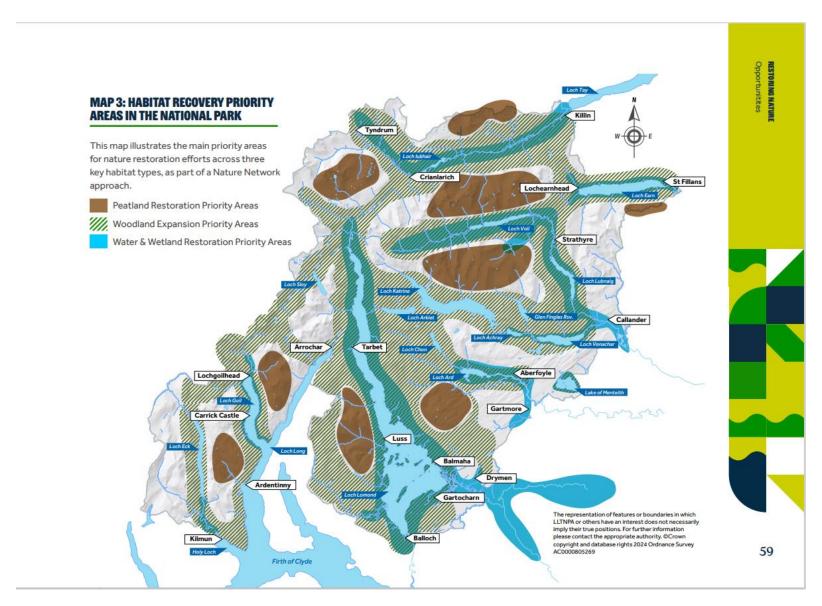
Appendix



Map 1: Peatland Cover in the National Park



Map 2: Woodland Cover and Native Woodland Creation Opportunities in the National Park



Map 3: Habitat Recovery Priority Areas in the National Park