



Loch Lomond & The Trossachs National Park Authority
Carrochan
Carrochan Road
Ballock
G83 8EG

Ref: EIR 2025-026
7 November 2025

Dear XXX

REQUEST UNDER FREEDOM OF INFORMATION (SCOTLAND) ACT 2002

We refer to your request for information, received by email on 11 September 2025. The information you have requested is environmental information, as defined in Regulation 2 of the Environmental Information (Scotland) Regulations 2004 (EIRs). We have therefore applied the exemption in section 39(2) of FOISA and dealt with your request under the EIRs alone.

Your Request

Please treat this as a request for environmental information under the Environmental Information (Scotland) Regulations 2004. It concerns the recent approval of the RSPB's proposed visitor hub at Wards (application ref: 2025/0351/DET).

I request the following:

- 1. Habitats Regulations Appraisals and Appropriate Assessments – full versions (drafts, final, appendices, screening notes, internal correspondence with NatureScot).**

For ease of reference, we have made all documents accessible online here:

[2024/0351/DET | Erection of nature hub building \(comprising visitor education centre and café, staff offices and associated welfare facilities\) and associated parking, construction of new footpath and alterations to existing vehicular access | RSPB Scotland Loch Lomond High Wards Farm Gartocharn Alexandria G83 8SB](#)

Please note that these documents will be available at the above link (from where they can be downloaded and kept) for eight weeks – until Friday 2nd January 2026.
LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

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National Park Headquarters, Carrochan, Carrochan Road, Ballock, G83 8EG Long: 4°34'24"W Lat: 56°00'12"N

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Internal correspondence with NatureScot has been attached. Please note that, as well as the redaction of personal information, in accordance The Environmental Information (Scotland) Regulations 2004 Section 10(5)(g) redactions have been made where the release of environmental information would, or would be likely to, prejudice the protection of the environment to which the information relates.

2. Visitor numbers and modelling – all data, reports or raw counts used to justify the projection of ~30,000 visitors per year.

We do not hold data, reports or raw counts used to justify the projection of ~30,000 visitors per year. Therefore, we advise you under Regulation 10(4)(a) of the EIRs, that the information you have requested is not held by the National Park Authority. The Officer's Recommendation Report, which analyses and discusses visitor projections within Section 8, relies solely on information contained within:

- A. The applicant's Design and Access Statement (paragraphs 5.6-5.7) where it advises approximately 15,500 people visited the reserve in the peak season (6-month period) from May to October 2024 inclusive.
- B. The consultation response from Kilmoronok Community Council (dated 07 April 2025) which references 30,000 additional visitors.
- C. Email correspondence between the officer and the applicant's agent dated 07 August 2025.

3. Parking surveys and assessments – any survey data or reports relied upon in assessing parking demand and displacement impacts.

The Officer's Recommendation Report relies solely on analysis of information relating to car parking within the applicant's Design and Access Statement (paragraphs 5.6-5.7). We do not hold any parking surveys, assessments or any survey data or reports relating to parking demand and displacement impacts.

Therefore, we advise you under Regulation 10(4)(a) of the EIRs, that the information you have requested is not held by the National Park Authority.

4. Internal communications – correspondence (emails, memos, meeting notes) between LLTNPA staff/officers and the RSPB concerning the application, including discussions on visitor management, parking, and the café.

Internal communications including emails sent between LLTNPA and the Agent and LLTNPA and the Applicant are attached.

5. Financial or funding references – any documents, reports, or correspondence that discuss RSPB's funding position at Wards, reliance on grants, volunteers, or the justification of the café as a revenue stream.

The Officer's Recommendation Report relies solely on information within the applicant's Design and Access Statement (page 41) with respect to the cafe and also its references to volunteer staff throughout. We do not hold any other documents, reports, or correspondence that discuss RSPB's funding position at Wards, reliance on grants, volunteers, or the justification of the café as a revenue.

Therefore, we advise you under Regulation 10(4)(a) of the EIRs, that the information you have requested is not held by the National Park Authority.

6. Conflict of interest consideration – any internal notes, legal advice, or officer discussions concerning LLTNPA's dual role as regulator and partner organisation in the Loch Lomond NNR.

On the subject of 'conflict of interest consideration' we do not hold internal notes, legal advice, or records of officer discussions concerning LLTNPA's dual role as regulator and partner organisation in the Loch Lomond NNR. In regard to this point, you may find the following advice helpful.

In this case the planning application (2024/0351/DET) was made by the RSPB who are a 'partner organisation' i.e. they work in partnership with the National Park to achieve the strategic aims of the National Park Partnership Plan. The National Park also has a direct role in management of visitors within a part of the Loch Lomond NNR (although not any part of the NNR to which this planning application relates).

Perceived conflict of interest in respect of planning decisions is a very common occurrence in a Local Authority context where other service departments undertake development or work alongside other organisations who themselves undertake development within the Local Authority area.

The National Park's Scheme of Delegation makes clear the role of the Director of Place (who oversees planning) - which is separate to and different from the role of the Director of Environment and Visitor Services (who oversees operational and visitor management and work with partner organisations). The Director of Environment has no role in planning decision-making. There are safeguards in the Scheme of Delegation for decision making and within the provisions of the Notification of Applications Regulations (The Town and County Planning (Notification

of Applications (Scotland) Direction 2007. These apply to the National Park as a full Planning Authority in the same way as a Local Authority.

The following advice by the Scottish Government may also be of interest - see particularly para 4 (National Parks) and then paras 5 to 7 and also 18 through to 20:

[Planning Advice Note 82: local authority interest developments - gov.scot](https://www.gov.scot/planning-advice-note-82-local-authority-interest-developments/)

7. Conditions discharge – any drafts or discussions relating to pre-commencement conditions, in particular Conditions 3, 4, 5–7, 9, and 12.

Planning conditions are discussed in the Officer's Recommendation Report. Discussions and/or correspondence relating to any and all planning conditions, where it is held, is contained within the email correspondence, and within formal responses to consultation by internal advisors and external consultees.

Yours sincerely

**Information Management
Loch Lomond and the Trossachs National Park Authority**

Review Procedure

If you are dissatisfied with this decision, or the way in which the Authority has dealt with your request, you are entitled to require the Authority to review its decision. Please note that in order for a review to take place you are required to:

- Send your request for review in writing, setting out in full the reasons why you are requesting a review.
- Submit your review request within 40 working days of either the date on which you received a response from the Authority or the date by which you should have received a response under the terms of the Freedom of Information (Scotland) Act 2002, whichever is the later.
- address your review request to:

Information Manager
Loch Lomond & The Trossachs National Park Authority
National Park Headquarters
Carrochan
Carrochan Road
Baloch
G83 8EG
E-mail: info@lochlomond-trossachs.org

The review will be handled by staff who were not involved in the original decision. You will receive notice of the result of your review within 20 working days.

If you are not satisfied with the response to your request for review, you can contact the Scottish Information Commissioner, the independent body which oversees the Freedom of Information (Scotland) Act 2002, at:

Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS
Tel: 01334 464610
Website: www.itspublicknowledge.info
E-mail: enquiries@itspublicknowledge.info