
PARK PLAN RESPONSE (First Draft-work in progress)

In our role as the only conservation charity with a focus solely on the area covered by the Loch Lomond and the Trossachs National Park, we welcome the opportunity to submit comments on the draft Park Plan covering the period 2012-2017. We of course were involved in two of the Park Plan consultation workshops on the topics of conservation and visitor experience so therefore some of our comments and suggestions have already been incorporated the draft Plan.

The consultation exercise is timely as we are currently undertaking a review of the Friends future role and priorities and where possible we intend to align some of our future work to helping influence and deliver elements of the finalised Park Plan in partnership with others, including the National Park Authority and local community and trade groups. We firmly believe within the resource constraints of a voluntary charitable conservation organisation we should be striving to make a difference and contribute in a positive way to helping to protect, promote and provide for this special place that is much loved by most Scots and visitors from other parts of the UK and overseas.

While our review will not be complete by the end of the draft Park Plan consultation period, it is clear our role as the truly independent conservation champion for the area covered by the National Park will take on even greater significance with the Park Authority confirming in the forward and introduction to the Plan its intention to place an emphasis on delivering the Scottish Government's sustainable economic development agenda and '*being a real generator for growth in Scotland*'. We also see opportunities to contribute to celebrating the natural and cultural heritage of Park in a variety of ways, many of which are not touched on or covered adequately in the draft Park Plan in our view. Linked to this, there are opportunities to be more proactive in the education field helping to introduce youngsters and others to the wonders of the area covered by the National Park

Historically, we have contributed to improving footpath access in parts of the Park, and we are currently helping to fund two strategic long distance routes and a local access project, but we are questioning the merits of continuing this type of activity in the medium term following the Park Authority's recent decision half way through the consultation period to set up a Countryside Trust to do this type of work. We welcome the allocation of additional resources to address access and other infrastructure deficiencies but are concerned about the potential for duplication and confusion with possible funders and existing long established countryside charitable bodies such as the Friends. We are also very disappointed the Park Authority pre-empted the current consultation exercise by not carrying out any proper consultation with bodies such as the Friends who have been active in this sphere of activity for around 30 years or so. We note the decision to set up the Trust, the detailed terms of reference and the list of partners that will be invited onto the Trust Board, was endorsed at the October Park Board meeting so clearly the consultation on this proposal as part of the Park Plan consultation is now academic.

It is unfortunate that due to funding and governance arrangements and Scottish Government policy directives, the National Park is constrained in being able to think in free and unfettered ways about what is best for the area in terms of truly balancing the four aims set out in the National Parks Act. This is no more so evident in the emphasis the Park Authority is now placing on the economic growth agenda and also the adoption of renewable energy policies that are pro-wind farms, following guidance and directives from the Scottish Government. It is also surprising that the four aims of the Park are not set out in the Park Plan given the Plan is supposed to act as a bridge between the National Park legislation and the co-ordination of delivery of services within the Park area.

We propose to make some strategic comments on the overall Park Plan that cannot be covered adequately within the confines of the structured questions set out in the draft document. We trust these points will be taken into account in preparing an updated and hopefully strengthened draft final Park Plan, along with the more detailed points we touch on below. Given the length of the document and our previous involvement in some of the workshops it is not our intention to comment on everything in detail and lack of comment on some aspects of the 59page document should be interpreted as the Friends being generally supportive.

1. Strategic Overview Comments

Securing Plan ‘Buy In’ - We recognise the importance of the National Park Plan as the co-ordination document for all public bodies operating in the Park and we genuinely hope this will provide guidance and focus for partners that makes a difference on the ground. We believe this will be very challenging given the current financial climate, and based on past evidence, there are grounds for real concern as some agencies have ‘paid lip service’ to the previous Park Plan. Yes, they have endorsed the previous Plan but how many diverted additional resources to help with the implementation of the various actions and what meaningful steps can be taken this time to ensure they do ‘step up to the plate’ and help deliver the vision and specific action under the three theme headings identified this time? In theory, this should be possible under the single outcome agreements but in reality we do have concerns about the level of resources that will be allocated to make real progress delivering some of the actions given the current budget constraints, the ‘marginal’ nature the area from nearby urban areas and the more pressing statutory obligations local authorities in particular are obliged to meet. A stronger mechanism needs to be in place to ensure good progress is made in delivering the actions and we don’t end up with a plethora of policy and action documents that are largely meaningless.

Resources – This partly follows on from the last point. We note with disappointment the lack of reference to the scale of resources that will be required to deliver the 46 actions set out in the draft Park Plan and how this compares with what has been achieved during the time of the first Park Plan. We appreciate the detailed supporting documents (as many as 20 in total?) are still being worked up to support the Plan implementation but it would be very useful in the next version of the Plan if some broad indication of projected spend could be incorporated so that partners and the public can see more clearly if the scale of the ambition set out in the section headed ‘*What Success Looks Like*’ is being adequately matched by resource allocations or if

this is just a collection of fine words which most reasonable people would have no difficulty endorsing. The inclusion of SMART policies and actions is essential in our view and at the moment some of the actions are not specific enough and none of them have even an indicative cost set against them. We believe this is a major weakness of the current draft Plan. We also consider there is a need for some sections of the document to be less bland and more specific but we appreciate the difficulty in writing a document of this nature with a wide variety of audiences to satisfy. The overriding objective should be to test each section against the four specific aims of the Park as set out in legislation and achieve a balanced range of actions that make a real difference.

Emphasis on Sustainable Economic Growth – We understand why so many overtures to the Scottish Government’s sustainable economic growth are made in the draft Park Plan as the Government is the funding sponsor of the National Park Authority, but we are anxious this doesn’t cloud the need to balance all four aims of the Park and ensure robust policies and actions are in place covering all of these. The document would benefit from a reference early on to the four aims of the Park as enshrined in the National Park legislation as both the foreword and introduction tend to over-emphasise the economic growth agenda, although there is an acknowledgement this needs to be set in the context of ensuring this is achieved while conserving the outstanding environment. We believe it is a major omission not having the four aims of the Park set out clearly at the beginning of the document and trust this will be addressed in the revised draft as all the policies and actions should flow from these four aims and in a balanced way.

We are also concerned that nowhere in the document is it spelt out what level of economic growth the Park Plan is setting out to achieve and this is also the case in relation to the tourism sector. Can statements such as *‘there is huge tourism potential in the area’* and *‘there is a need to capitalise more fully on this large and expanding tourism market’* be backed up with some quantification of the scale of growth the Plan is seeking to achieve and how does this square with the spectacular failure at national level to deliver the 50% growth in visitor numbers and 20% growth in spend set out in the Scottish Government’s Framework For Change document covering the period 2005-2015? In recent years in some tourism sectors locally and nationally there has been decline and at best a static position and it needs to be recognised in the Plan that more requires to be done working with existing businesses to retain existing and grow new and emerging markets with potential. The Visitor Experience section and the supporting tourism action plan need to recognise sustaining existing businesses is an important priority as part of ensuring there are vibrant local communities.

Preventative Investment – We fully support the sentiments expressed by the Park Convener in the foreword and also elsewhere in the introduction on the topic of preventative investment being desirable. It makes sense to us to have some focus on preventative investments not only in the health and wellbeing of Scots but also in conservation, visitor management and tourism. As part of this agenda we consider it is essential there is more investment in the fabric of what currently exists on the ground as there are a number of examples currently where there was significant capital investment in infrastructure that is now not being maintained to an adequate standard e.g. the southern section of the West Highland Way. We are also anxious to ensure that as part of visitor management rationalisation exercises the commercial

leasing of publicly funded visitor facilities is handled more sensitively and safeguards are built in to ensure the quality of visitor information and interpretative facilities and services are not unduly diluted. The same principle should apply the Trossachs Lochs Management Initiative where there is a potential threat of closure of some of the smaller and more intimate car parks - bigger is not always better! Similarly, there are issues surrounding offering new commercial franchises to businesses that potentially can dilute the market for existing fragile businesses. It is not always the case that sustainable development thrives on competition if the markets they are serving are in decline or changing at the same time as public agencies are ‘artificially’ intervening by encouraging new businesses in publicly funded amenities such as car parks and visitor centres.

National Outcomes – We are very surprised and disappointed it is envisaged the Park Plan, when implemented will not contribute to some of the Scottish Government outcomes featured in the table on page 15. Surely as the most popular and heavily visited countryside destination in Scotland and given the proximity of the Park to deprived urban areas, there must be potential for the National Park to help improve the life chances for children, young people and families at risk? Also surely the Park Plan has a role in ensuring our people are better educated, more skilled and more successful otherwise why bother including a Rural Development section in the Plan and how does this sit with the ambition to ensure businesses and communities thrive throughout the National Park?

We would suggest improving life chances and ensuring our young people get a good start in life should feature in the Plan as a number of children from urban areas and difficult backgrounds have enjoyed life changing outdoor education and adventure experiences in the Park and more should be actively encouraged to do so in the future with appropriate support measures in place to allow this to happen. There is a long tradition of this type of activity in the Park and there is scope to do much more as demonstrated in our recent involvement in the rescue of Ardroy Outdoor Education Centre in Lochgoilhead. A new social enterprise is re-opening the Centre to provide outdoor adventure and learning experiences to 2,000-3,000 children a year including youngsters from disadvantaged backgrounds in the Glasgow area through working with a range of support groups.

This weakness in the draft Plan needs to be addressed and the focus needs to be broader than targeting the more affluent visitors to the Park as part of the sustainable economic agenda. Social responsibilities relating to communities outwith the Park should also be a feature of the Park Plan as the Park area, as Scotland’s leading outdoor playground, should make a positive and greater contribution to improving the life chances of our people building on the ways it has done historically for several generations.

2.Responses to Questions

Q1 What Success Looks Like for the Park – There is not much to disagree with the picture painted in words and photographs on pages 5-9 of the Plan but it is not clear what timescale the description of success relates to. Is it the 5year timescale of the draft Plan or is it a 20year vision of what success might look like? If it is the latter, then there is a prospect of achieving much of what is envisaged but if it is the former,

then we would disagree that this is achievable in a 5 year period. There is nothing wrong with being ambitious but this also needs to be firmly rooted in what is realistically achievable within specified timescales.

We broadly endorse the picture painted but would ask that on page 6 of the vision the reference to '*There are plentiful opportunities for people to enjoy the lochs with their own boats or hiring boats for a pleasant day out. There are pontoons, jetties and marinas for all types of craft*' is qualified as this gives the impression that all the lochs are open to business for all types of craft which surely is not the case. A reference to **some** lochs and **some or most** types of craft would be helpful. Similarly on page 7 we don't disagree there should be '*lots of different activities for everyone on or around the Park's many lochs*' but this should perhaps make a reference to some lochs being suitable for quieter forms of recreation and others having opportunities for motorised activities. This would help get over the message in the success statement that not everything 'goes' anywhere and there is some bias to quieter forms of recreation instead of aspiring to be the watersports capital of Scotland. Tranquillity and authenticity should be key features of what success looks like too and they currently don't feature at all.

We also agree with the sentiment that every visitor should have the opportunity to be welcomed by the Ranger Service but the prospects of this happening consistently and regularly in honeypot and high volume visitor transient areas such as the landward part of West Loch Lomondside is challenging, notwithstanding the welcome efforts to boost the voluntary ranger services. The franchising of visitor centres has weakened some of the 'visitor touchstones' to obtain information about the Park from knowledgeable staff as has the removal of valuable interpretative facilities. To address this we would suggest more effort needs to go into training initiatives and tightening up future franchise agreements so that the staff of every business which comes into contact with visitors are knowledgeable on things to see and do in the Park and its special qualities. This could be achieved by working more pro-actively with existing trade groups in different parts of the Park in partnership with the enterprise agencies. A condition should also be built into franchises to allocate a specific area of floorspace for information and interpretation.

We agree there is much to be learned from some of the world's leading National Parks due to their much longer history and enviable track records in conservation, visitor management and information and interpretative services. However, there is also a need to look closer to home such as at parts of rural Britain for ideas on how to tackle issues such as sustaining a diverse rural economy. At present the rural economy of the Park is very fragile and is over dependent on tourism. There is a real danger of further depopulation and marginal businesses ceasing to trade unless there is a stronger raft of policies and actions to help sustain vibrant communities in the Rural Development section of the Plan. In the earlier sections of the Plan and the *What Success Looks Like* section there are references to a thriving business community being an aspiration and we would endorse this and suggest more measures are required to address the fragility of the business sector in the Park.

We are not sure about the final statement in this section as most Scots are already proud of the Loch Lomond and the Trossachs area due to its special qualities. Research also shows that many are proud that the area is part of the worldwide family

of National Parks. However, what is less clear is that the area lives up to the expectations of visitors from home and abroad in terms of the quality of the infrastructure, visitor management and service standards. We would therefore suggest the last statement is modified to read as follows - *'Ensuring the National Park is a place Scots can be proud of that matches the best in the worldwide family of National Parks'*

Q2 National Park Principles - We generally support the long-term National Park principles but consider they should be set in the context of the four aims of the Park more clearly. There is a reference to them underpinning all four aims but nowhere in the Plan are these aims detailed and it should not be assumed all consultees and bodies involved in the Park Plan delivery know what they are. The text under the partnership principle should also be expanded to make it more clear what is expected of other public bodies in their corporate plans and how this adds real value to delivering the Park plan outcomes. This should be more than a tick the box exercise with real resources identified against specific actions.

In the *'Delivering the Promise'* section on p4 prior to setting out the Park principles a series of questions are asked and the answer in our view to the first three is no and the last one is yes. We would also ask that the concluding statement that *'This plan aims to make the Park a must visit destination, a real driver for economic growth in Scotland and a high quality environment'* is modified as it gives the impression the Plan is all about delivering higher visitor numbers and more economic growth in a high quality environment. There is an issue around numbers and short dwell times with low economic benefit and surely it would be better to aim *to make the Park a high quality visitor destination where the quality of the experience and the environment are exemplars in the international family of National Parks*. This would tie in with the final success statement on page 9 from which economic and conservation benefits would flow with increased visitor dwell times, higher spend levels and improved visitor satisfaction with greater propensity for repeat visits and greater appreciation and understanding of the special environmental qualities of the Park.

Conservation Theme

Q3 – Major Conservation Challenges – We agree with the definition of conservation and the acknowledgement that it also embraces the cultural assets of the Park as well as the natural ones. We are encouraged by some of the progress that has been made in this area in recent years given some of the complex long-term challenges. We are also pleased we have managed to make a positive contribution to furthering a range of conservation initiatives in partnership with the Park and others. Over 60 businesses are now actively fundraising as part of the Friends led Our park voluntary visitor donation scheme and other programmes such as our Business Supporters and this has enabled us to invest in a wider range of conservation, access and education programmes. In the current year 9 projects were supported by the Friends with a combined value of at least £150,000. We plan to build on this further in future years although the priorities may change with the recent emergence of the Park's new Countryside Trust. On the educational front we have also progressed several initiatives such as the development of a wildlife website and supporting activity to raise awareness of the rich diversity of wildlife that exists in the Park.

We agree with the 12 conservation challenges set out on page 18 but there are more. Given the Plan's definition of conservation embraces the management and enhancement of cultural assets we are surprised there are no references to supporting the cultural heritage of the area in positive ways. Some of the major assets the Park has are its talented people of all ages and a rich heritage that goes beyond historic building conditions referred to in the issues section. There should be some specific action relating to showcasing the heritage and talents of Park residents as well as the rich tapestry of stories that are in danger of being lost or not being publicised. Given that authenticity is now a major part of the decision-making process in determining holiday choices we consider there is great potential to make much more of the cultural assets of the Park-our people past and present as part of a well thought through 'sense of place' strategy.

Q4 – Overarching Conservation Outcome – We agree with the general thrust of the conservation outcome but would suggest there should be a reference to **responsible** management included.

Q5 – Conservation Policy Statements – We agree with all 6 policy statements but consider there is a need to include something on promoting understanding and appreciation of conservation assets-both natural and cultural. There currently is only a reference to promoting understanding of the significance of archaeological sites in this section. We also consider other supporting statements on the cultural heritage under Con 6: Cultural Heritage are required as reference should be made to celebrating and promoting the cultural heritage of the area and this goes wider than events eg. recording oral history, researching, storing and presenting old pictures and stories effectively, etc. This is a strong feature of many of the wider family of National Parks, particularly in Eastern Europe and North America and should surely also be priority in the Loch Lomond and the Trossachs area.

Q6-8 – Priorities for Action & Targets/Friends Role – We are generally supportive of all 15 priorities for action and the various targets with some qualifications. We also think there are still some gaps.

We welcome Priority C1-Natural Asset Management but are disappointed that the planned approach to take account of the value of natural resources in decision-making by public bodies won't be in place until at least 2014. Can and should the Park Authority not be leading the way and doing this as a matter of routine now or at least in the very near future?

The dark skies policy development for land of wild character (Priority C5) has our support as long as a pragmatic approach is adopted taking account of health and safety issues.

Designed landscape management agreements are welcome but we consider a more ambitious target than 25% of the total could be set as this will only result in 1 inventory designed landscape and 4 of local significance being under management agreements by 2017.

Priority C10 Loch Lomond - We support the byelaw review and are currently part of the stakeholder group involved in considering changes and will continue to participate in an advisory capacity.

Priority C12 Carbon Storage – We are generally supportive of the plans for woodland expansion in the National Park for climate change and other purposes but we do have concerns that the special landscape qualities are adversely impacted upon in sensitive areas. Adding around 600 hectares a year of woodland is significant and efforts require to be made to avoid some of the issues that arose originally with the Great Trossachs Forest plans in the sensitive Strathard to Inversnaid corridor. We would welcome being consulted on some of the larger planting schemes in sensitive landscapes.

Priorities C13-C15 – We support all three cultural heritage priorities for action but would ask that C15-Cultural Events actions and targets are strengthened as this currently gives the impression all that is planned is better co-ordination of existing cultural events when what is also needed is more support to grow and enhance existing events and introduce some new events to celebrate the area's rich cultural heritage and boost tourism. Small-scale grant schemes should be introduced and strengthened where they exist to complement Event and Creative Scotland grant schemes for larger events. The evidence base for more ambitious action could be enhanced, by liaising with existing event organisers and not solely using the feedback from the ScottsLand evaluation. There is a potential role for the Friends here as part of our emerging agenda of celebrating more the heritage assets of the National Park-its people and landscapes. There is also a role for local trade groups, local events organisers and local authorities that should be added under the relevant organisations heading.

We would also suggest, as alluded to in our response to Q5 that at least one additional priority for action needs to be added under the Cultural heritage heading. Our suggestion is – Priority *C16 – Research and Promote the Cultural Heritage of the*

People of the Park. There is a need to record and maintain records of the traditions and people's stories as part of developing a database that can be drawn on to present the rich cultural heritage of the Park. There is scope to present this in imaginative and accessible ways in DVDs, podcasts, recordings, publications, on the internet and in exhibitions. Targets could include developing an up to date interpretative plan by 2013 and supporting at least 10 projects. Relevant Organisations could include the National Park Authority, local authorities, the Friends and local community trusts and cultural groups.

The implementation section of action plans and projects document list is deficient as there is nothing that specifically deals with cultural heritage and this needs to be addressed in our view. Also the conservation conclusion should be re-drafted as it is currently totally skewed to supporting the long-term health of the area as a visitor destination and underpinning sustainable growth. We agree good conservation measures will help these aims but surely there are wider justifications too for investing in conservation and there would be merit in having a more rounded and balanced statement here.

Visitor Experience Theme

There is very little we disagree with in the introductory section (p31) but it does give the gives the impression that the focus for the next 5 years will be catering more effectively for the current annual level of 7 million visitor days and we welcome this. However, great play is made in introductory sections and elsewhere in the document about '*the huge tourism potential in the area and the need to capitalise more on this large and expanding tourism market*' but yet this is not identified as a key challenge or referred to in the priorities for action or indeed quantified. There are mixed messages and greater clarity on what the Plan is trying to achieve is needed. We welcome the focus on 'the back to basics' agenda as there are some serious quality and infrastructure neglect/weaknesses in the area. If these are adequately addressed then there is a real prospect of stemming decline and securing steady growth in visitor dwell time, spend levels and propensity for repeat visits linked to increasing visitor satisfaction levels. This in our view is where the real growth potential lies. It costs significantly more to attract new visitors as opposed to looking after existing visitors better and offering them a higher quality visitor experience. A key theme should be investing in quality and not quantity as part of the preventative investment measures identified as a priority in the introductory sections of the Plan.

The definition of what is meant by the concept of the visitor experience on p31 could be clearer and would benefit from the people side of the industry being pulled out into an expanded fourth bullet point to emphasise the importance of friendly, well trained and motivated staff and hosts being one of the key ingredients of the visitor experience as opposed to being lumped in as part of bullet point three that also refers to infrastructure such as signage and transport. Consistently, national and international research highlights the importance visitors place on receiving authentic visitor experiences and authenticity should feature strongly in the Park Plan and supporting tourism action plan. It is completely ignored at present.

Q9 - Major Visitor Experience Challenges – We agree with the ten major challenges identified but there are some key ones missing relating to customer service

and the people side of the industry. You can have high quality infrastructure but be let down badly by the attitude of poorly paid and trained staff and hosts and this needs to feature in the main visitor experience challenges. At the end of the day tourism is a people industry that needs backed up by high quality infrastructure. More needs to be done to develop a strong staff and host culture that recognises the value of providing good service and projecting the assets of this special place to customers. Also the need to deliver authentic and high quality National Park experiences should feature in the list of main challenges.

Q10 – Overarching Visitor Experience Outcome – We agree with the suggested outcome statement but suggest it would benefit from the addition of authentic and National Park- *‘A high quality **authentic National Park** experience for visitors within an internationally renowned landscape that compares to the best on offer around the world’.*

Q11 – Visitor Experience Policy Statements – We agree with all six policy statements with some minor suggested amendments. Under policy 2 b): Sustainable Transport while we agree better co-ordination and consistency of information, signage and visitor services are required we believe that this should not be at the expense of allowing some diversity within agreed design guideline frameworks. There is a danger of overdoing National Park branding at community level in particular where differentiation to reflect the character of individual settlements is desirable. Under Policy 2 d): Sustainable Transport we suggest this should read *‘Creating, co-ordinating **and promoting** a wider range of...’.* Under Policy 6 c): National Park Scenic Routes a reference should also be included for the A84/A85.

We recommend that at least one additional policy is added relating to *People and Host Communities*. This should pick up on the importance of having well trained, knowledgeable, friendly and motivated staff and hosts as touched on earlier. This also ties in with Priority V10. There would also be merit in looking at opportunities to strengthen the quality of welcome in host communities with branded neighbourhood info points in locations such as local shops. This would also complement the welcome comfort stops introduced recently by Stirling Council in a number of commercial premises. A welcoming communities series of actions could easily be identified to support this policy. There also needs to be wider recognition that every customer facing business in the Park has a role in welcoming and giving advice to visitors.

Q12-14 – Priorities for Action & Targets/ Friends Role – We are generally supportive of the 19 priorities for action and the targets with some qualifications. We also do not think there are any significant gaps other than adding a host community element to Priority VE 10 or incorporating a new action heading under tourism to properly address the role and contribution of people and host communities.

Priority VE2 Review of Camping Management – We understood the camping byelaws on East Loch Lomond was a two year pilot and are of the opinion the lessons can be reviewed quickly thereafter and we are therefore disappointed that the Park Authority proposes to wait until 2014 before consulting on camping in other parts of the Park. This means that it will be at least 2015 before action can take place in other areas under pressure from this type of activity such as Loch Lubnaig, Loch Venachar

and Loch Earn and we consider this is unacceptable. We are aware of the Trossachs Five Lochs visitor management review and the NPA and others should be prepared to take action much earlier as opposed to having in effect a four year gap between the East Loch Lomond camping initiative and anything being progressed elsewhere on the informal camping issue.

Under Priority VE3 Capacity Management we welcome the proposals to have visitor management plans in place for the Loch Lomond Islands, Luss and the 5 Lochs area on a rolling basis over the next three years and we would welcome early consultation so that we can influence the content before a firm course of action is set.

Priority VE5 Sustainable Traffic Management- We have some reservations about some of the traffic management options identified under this priority and while we note it is the intention to consult with local people before moving forward with implementation of any schemes we have some doubts the consultation results will not influence the public authorities involved in this. There is recent experience of the local business community not being consulted on the timing of important tourist routes being closed for resurfacing works with consequent negative knock on effects for their businesses. We would welcome being added to the consultee list.

Priority VE7 Better information and Signage for Visitors – We don't disagree with the general thrust of this priority under the what does this mean heading provided there is a recognition that consistency in signing and websites doesn't always mean adopting National Park branding guidelines which have a number of deficiencies and don't adequately portray the diversity of different parts of the Park. There surely is nothing wrong with having a myriad of different styles of websites for individual businesses and sub areas provided there are guidelines in place to ensure there are good web links between them and the planned National Park web portal. Similarly, while there is a case for rationalising the clutter of different signing and strengthening threshold National Park welcome signs/markers linked to scenic pull ins it should be recognised one house style may not fit all requirements and there should still be some flexibility within guidelines to allow individual strengths and diversity of businesses and communities to be expressed.

Within the Cairngorms National Park and many other UK and overseas National Parks there is a house style for certain types of signing but National Park branding is not imposed on individual communities in the way that is being suggested under Priority VE7. Individual communities should have the freedom to project their distinctiveness on their welcome signs and not have National Park signs imposed on them if this is not their preferred option. Under the evidence base heading it will require more than the results of the 2011 National Park Visitor Survey to support these website and signage proposals. Effective consultation requires to be undertaken with the range of active trade groups throughout the area as well as Community Councils. These groups should be added in the list of relevant organisations along with the Friends given our interest in conserving and promoting the natural and culture heritage of the Park and its distinctive features.

Reference is made in this section to crucial locations to provide tourist information and we are therefore very surprised there is nothing under the targets heading relating to the provision of manned information centres and points. Research consistently

confirms the high proportion of visitors who appreciate and use manned information centres/ points. While we appreciate the Park Authority itself has withdrawn from the direct provision of manned information services at Visitor Centres at Luss and Loch Lomond Shores this does not preclude the need for services of a reasonable standard to be provided by others throughout the Park and not just in honeypot locations. A mixture of providers including VisitScotland and the Forestry Commission are active in this field and there is scope for greater cooperation and a joined up approach to welcoming and guiding visitors on what there is to see and do in the Park. There is also scope to roll out a community/business information point initiative in the smaller towns and villages throughout the Park as well as complementing this with IT solutions such as the innovative iSign service that is due to be piloted by the new Loch Lomond Destination Organisation. We strongly recommend a series of practical actions to improve information services should be added under this heading. This seems to us a major gap in the hierarchy of information provision in a Park that aspires to be an exemplar in delivering a high quality National Park visitor experience. We appreciate the Park Rangers and voluntary Rangers speak to a number of visitors but there is still a very large proportion of the visitors generating 7 million visitor days who do not come into contact with Rangers and other methods of interacting with visitors need to be added to the mix.

Under the relevant organisations Priority VE8 Better-Meeting Visitor Expectations, the local trade groups who have been active for many years throughout the Park should be added. They also have the advantage of being more representative than the NP Destination Group at the present time with around 400 businesses in their membership schemes. More generally, there is a need to strengthen links between these groups, the National Park and the NP Destination Group to ensure there is a co-ordinated tourism effort and this should appear as a standalone priority action. Local trade groups need to be added to Priorities VE 9 and 10 as they will have an important role to play in maximising the tourism benefits of major national and international events in 2014 and also helping to secure the successful delivery of the service standard initiative planned for the National Park.

Priority VE12 Maintenance and Enhancement of Recreation Provision – We note the proposal by 2013 to have in place a Countryside Recreation Trust for the National Park. Notwithstanding our earlier comments on this proposal which has now been brought forward with the recent decision, it would be useful to understand the decision to move so quickly and without proper consultation and well in advance of the end of the consultation period on the draft Park Plan. We note the primary focus of this new trust will be enhancement of paths and links and in light of this we will urgently review our involvement in this area of activity to minimise duplication. We would have thought given our track record in helping to fund and deliver access initiatives over a 30 year period this would have merited being added to the list of relevant organisations. The links between the Friends of Our Park voluntary visitor donation scheme will require to be reviewed as delivering some of the funding raised via businesses is targeted at access improvements.

Priority VE13 - Promotion of Path and Water Networks – We would suggest a series of additional targets need to be set as there are a number of additional and cost effective ways of promoting access routes and the related activities over and above simply producing leaflets. Local trade groups, community development trusts and the

Friends also have a role to play in publicising the range of recreational opportunities available and should feature in the relevant organisations column.

Priorities VE15 and VE16 –Outdoor Learning/Increased Support for those Experiencing Disadvantage – We are pleased to see both these actions featured and in light of this activity and our earlier comments the National Outcomes contributions should be altered. Under VE16 we would like to see some practical early targets as otherwise it is unlikely we will see any increase in activity until 2014 by the time mapping has been completed and a working group has been set up to deliberate and come forward with recommendations. In the meantime many disadvantaged groups and individuals are having difficulty accessing opportunities to experience the National Park. We would recommend that some quick win pilot initiatives are supported including the provision of possibly subsidised places at Outdoor Education Centres and support for transport. The Friends are currently involved in supporting a pilot initiative of this nature with the help of commercial sponsors and charitable trusts.

Priority VE18 National Park Volunteers – We welcome this initiative and the Friends are actively involved in the delivery of volunteering programmes often in consultation with the National Park. On a joint basis we have recently run a successful joint volunteering initiative targeted at businesses around Loch Lomond that enjoyed a very high uptake. There is scope to do more of these events under the Friends Our park scheme in partnership with other bodies. The Friends should be added to the list of relevant organisations under this heading.

VE19 National Park Scenic Routes – An initiative we very much welcome and have been campaigning for. Under the targets heading in addition to running a design competition for innovative lay-bys/scenic lookouts we strongly recommend there is a specific target added to invest in several improved lay-by projects over the next few years on routes such as the A84/85 and A83 while work on the A82 upgrade is still under preparation.

Rural Development Theme

Q15 Major Rural Development Challenges – We agree with the 9 major challenges identified but would suggest there is scope to add a further two or some of the existing one could be altered. Under challenge a) there is a reference to *the need to provide a wider range of housing, training and employment opportunities* which we would agree with but there should also be a reference to the need to provide more better paid employment opportunities. The rural area, and particularly those parts of the Park outwith reasonable commuter zones, are characterised by low paid and often seasonal jobs and this often exacerbates many individuals and families ability to purchase housing. The fragility of the rural economy is understated and should feature more strongly in the major challenges list. Also under g) reference is made to the impact of the reductions in budgets on essential public services and there would be merit in adding a further major challenge relating to the reduction of public sector support for economic development and support for rural businesses. The combination of the drift towards centralisation and the reductions in budgets means that Local Enterprise Companies and Area Tourist Board with dedicated budgets no longer exist to support the area and due to competing pressures on budgets local authorities are under

funding the rural economic effort which is not helping address the issues of rural fragility in a concerted and focussed way. There is a need for a serious step change in the level of support for rural businesses in the Park as European funded schemes are also coming to an end during the life of the Park Plan. A reference should also be made to the major challenge faced by rural businesses in securing bank loans at the current time for business expansion and upgrading schemes. This is a real issue for the Park as a number of successful businesses have put a brake on expansion schemes due to the lack of lending facilities from the banks.

Q16 Overarching Rural Development Outcome – We endorse the aspiration to ensure ‘*in the National Park businesses and communities thrive and people live and work sustainably within a high quality environment*’ but we believe a stronger and better resourced package of measures than those set out in the draft Park Plan are required. However, we accept this is not the Friends area of expertise and it for others to judge if the broadbrush policies and supporting priorities for action are sufficiently bold to make a real impact and difference.

Q17 Rural Development Policy Statements – The 7 policy statements the main topics you would expect in any rural development action plan and the questions remain are they bold and radical enough to make a real difference and what resources are likely to be available to tackle the issues and identified priorities in meaningful ways over the 5 year period of the Park Plan?

Q18-20 Priorities for Action /Targets - We have no detailed comments on specific actions but consider under the rural economy heading there should be an action /target relating to improving access to finance to help businesses grow and invest in their products and services. There is a real danger if access to finance is stifled then the vision outlined in this plan to improve the quality of the visitor experience and ensure businesses and communities thrive will not be achieved. Under the built environment heading we welcome the plans to introduce National Park design awards and to progress a master plan for Callander as the town is currently under performing in its role as the unofficial capital of the National Park. It has so much more potential that requires co-ordinated and practical actions linked to securing more investment.

3.Implementation

We welcome the points set out on p56 to ensure the Plan is taken forward on a collaborative and effective basis but we would reiterate our concerns that under the National Park legislation other public bodies are required to have regard to the Park Plan but this is fairly meaningless unless robust measures are put in place and ‘policed’ by Government Ministers to ensure compliance in tangible ways and not merely just having a few policy statements in corporate plans. Given the growing pressures on the public purse we are concerned that the scale of funding allocated in corporate plans to deliver Park Plan commitments will fall well short of what is required. This reinforces the need for transparency and at some point a commitment to publish what individual agency funding commitments are to help deliver the Plan priorities and outcomes.

4 Concluding Remarks

We appreciate as a voluntary charitable organisation we have limited resources at our disposal but our independence and passionate commitment to protect, promote and provide for the area covered by the Park remains strong and we intend to play our part to try and support the delivery of a number of the priorities in the Plan in positive and practical ways. We look forward to seeing the revised version of the plan and trust that a number of the suggestions and points we have made in this submission will be taken account of in the finalised draft. We wish the Park Authority well in moving swiftly to the preparation and publication of the finalised version of the Draft Plan and the myriad of supporting documents with partners. We also hope you will achieve strong 'buy in' from partners and a series level of resources will be allocated even in these challenging financial times to move forward with the delivery of the vision and priorities for action in the adopted Park Plan.

Friends of Loch Lomond and the Trossachs
October 2011
JF