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Dear Kenny

Active Park Healthy People - Consultation Response

Sincere apologies for the delay in replying to your formal consultation on the draft Active Park Healthy People (Outdoor Recreation Delivery Plan) document and thank you for extending the period for our fuller response below.

Ironically, over the past week John Urquhart and I have been busy responding to the shocking plans announced by Glasgow City Council to close Blairvadach Outdoor Education Centre just outside the National Park. This is happening at a time when the Scottish Government is placing a greater emphasis on issues such as health, wellbeing and environmental education. This decision seems to fly in the face of these priorities and will deprive the young people of Glasgow of life changing experiences in Scotland's great outdoors including the National Park which is used extensively by the outdoor instructors. For over 45 years Blairvadach has been a leading provider of quality outdoor education and training which has made an enormous contribution to the personal development of tens of thousands of Glasgow's young people.

Outdoor Education Centres in and around the National Park are major providers of outdoor recreation programmes for young people and they help to deliver some of the desired outcomes outlined in your document but yet, surprisingly, they don't receive a mention and there are no specific actions relating to safeguarding/supporting/cooperating with outdoor education centres. This surely is an oversight and we would ask you to address this in the final version of your document. For some reason the same applies to the Partnership Plan which we have highlighted previously and also at the Partnership Plan Review conference last November.

Overall while the document is well presented and we are supportive of the six key themes identified, we are concerned that there is a distinct lack of specific deliverable and costed actions. Given the sub-title of the document is "Outdoor Recreation Delivery Plan" we are surprised this is the case and we would have liked to have seen more action based on SMART principles. We are also disappointed there has been a gap of several years since the expiry of the National Park's previous Outdoor Recreation Plan which covered the period 2013-2017 but appreciate there are a raft of other policy documents, including the Partnership Plan, which includes some outdoor recreation actions and targets.

We acknowledge there are sensitivities around partner resource constraints but given the number of major funding streams to emerge at national level in recent years for a range of initiatives relating to access, transport, sustainability, etc. we strongly believe the NPA should be bolder with a more ambitious set of actions and deliverables and to truly try and make a difference with the help and support of partners. This is particularly true of issues such as the introduction of pilot transport projects to address the major deficiencies that currently exist in helping to improve public access to recreational opportunities in areas such as the Trossachs and the eastern part of the National Park where public transport is either very poor or non-existent. This is also the case for accessing the National Park from major settlements like Helensburgh.

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As is stated on page 6 under the heading 'Why do we need a plan?'...'the National Park offers a unique opportunity to bring partners together to undertake innovative and ambitious work "... in the outdoor recreation, health and well-being sectors. It is important the ambitious vision for recreation and active, sustainable lifestyles is backed up by a clearer and costed set of specific actions.

The indicators of success on page 49 should be strengthened. The baselines referred to should be stated as it is not clear to the reader what numbers are involved. Surprising there are targets to reduce proportions arriving or exploring the National Park by car and increasing the proportion exploring by foot and bike but there are no specific targets for increasing the proportion arriving or exploring by public transport.

On page 7 in the section headed 'Who is it for?' mention is made that the plan does not cover activities such as fishing and boating but there is no explanation of why not. Surely with fishing being a high participation outdoor sport, it merits inclusion and some supporting action. Similarly given the vast stretches of waterways and shorelines we would have thought boating should feature too.

The diagrams on pages 8 and 9 are useful in setting some context for the Outdoor Recreation Delivery Plan but they do also serve to suggest the policy and strategy framework is a crowded place with a danger of delivery documents being drowned in 'policy and strategy speak' and a lack of specific actions.

A Park for All

We support the 'Park for All' vision and ethos but consider this is not achievable without more of a focus on making the National Park more accessible by all modes of travel. There tends to be quite a focus on cycling and walking routes in the plan but very little focus on ramping up accessibility by public transport with some bolder initiatives designed to really create a 'Park for All' . At present there are large sections of the population excluded as they do not have access to cars and there is a real danger of continuing to create a 'Park for the Middle Classes' due to the lack of affordable and truly accessible transport choices. This is reinforced by the map on page 11 which highlights a vast swathe of the Trossachs and the Callander/Killin corridor as 'active and vibrant places' where public transport is lacking. How do people in the Glasgow conurbation access this area if they don't have a car? It is a very long and challenging cycle or walk to get to several of the 'active and vibrant places' identified. There is also no mention of key gateways such as Helensburgh, Dumbarton and Dunoon. Also we suggest Lochgoilhead and Ardentinn are worthy of inclusion.

On page 13 we welcome the emphasis on removing barriers to access and being more inclusive. Very surprised that public transport (or lack of) doesn't feature in the list of examples of barriers quoted. It is not simply down to just issues with paths or marketing materials.

Priority 1 -page14. With the demise of the Trossachs mobility scheme there should be a specific action to bring interested community and business partners together to try and deliver a more sustainable delivery model. In this context the Steamship Sir Walter Scott Trust has plans for a mobility hub at Trossachs Pier. In the past the Friends have helped fund a wheelyboat at Lake of Menteith Fishery for disabled fishers and there must be scope for the roll out of some more practical accessibility initiatives elsewhere in the National Park.

Priority 3-page 15. Given what they do in terms of actual delivery, surprised no mention of HADAT and FOLLAT as potential "delivery partners". The Friends have supported a number of path projects through the Friends of OUR park visitor giving scheme and, along with HADAT and Luss Estates, we are currently promoting the development of a new West Loch Lomond Skyline walk as an alternative to the current Three Lochs Way. We are also in active discussion with F&LS to secure path improvements in the Tarbet and Balmaha areas which may involve entering management agreements to make things happen on the ground with a number of agencies, including the NPA, reluctant to take on any more path maintenance responsibilities.

We support the delivery principles outlined on page 16.

More generally, we would like to see a mention of the role of Outdoor Education Centres in this Parks for All section. As mentioned in our introductory remarks Outdoor Centres play a pivotal role in



introducing circa 15,000 youngsters per year to the great outdoors and specific recreational activities in the National Park and they are in a unique position to reach sectors of the community which have difficulty accessing outdoor activities. They deliver life changing experiences for all youngsters and their role needs to be more to the fore in the Outdoor Recreation Delivery Plan. What other group or agency in your list of delivery partners can come anywhere near matching what is being delivered year in year out by the Outdoor Centres that are still in operation in and around the National Park?

Page 17 Map 2. Surprised to see a number of the Step into the Park are well away from where people live and work which seems contrary to the text under action 4 on page 16. Also quite a few are well away from public transport routes.

Active and Vibrant Places

Page 18. While we are supportive of the vision set out at the start of this section we are concerned at that in paragraph 3 there appears to be a very anti-car statement. Cars are a necessity to live and work in many of the communities and for people to visit where there is no or poor public transport, and as part of a balanced strategy which includes more positive provision for walkers and cyclists, some provision also requires to be made for better designed and more car parking capacity in some locations to manage visitor pressures more effectively. Generally there seems to be an anti-car theme emerging more strongly in a number of NPA policy documents and statements which we believe is unhelpful. We believe there should be more emphasis on trying to create a lower carbon National Park which of course is achievable by adopting a range of policies which includes making better provision for electric cars, cycling, walking and of course providing more and better public transport services.

Page 19. A good example of worthy sounding words which don't really amount of anything of much substance. What does this mean in reality? What type of infrastructure is being considered and how do people get to these communities in the first place which are some distance away from major population centres?

Page 20. We are supportive of the ambition for Aberfoyle and the wider Trossachs area but we are anxious to ensure there is not an over emphasis on mountain biking to the detriment of other outdoor activities such as walking and sightseeing. We are anxious to ensure there is a well developed network of safe, off highway walking and cycling routes. At present there are some strategic gaps for example in the heart of the Trossachs between Loch Katrine and Brig o' Turk. Also the importance of the private Scottish Water family friendly cycleway between Trossachs Pier and Stronachlachar which was recently badly affected by landslips needs to be recognised and protected. This is the busiest family friendly cycle route in the entire National Park and there was a potential danger of this being lost forever. Trossachs and Callander Community organisations need to feature in the list of delivery partners as their community action plans have some priorities relating to outdoor activities and walking/cycling network development. We consider the focus should not be simply on Strathard.

Page 21. We are disappointed there is no mention of the Friends or HADAT in the list of delivery partners given the efforts we have made in recent years to try and introduce pilot eco transport services in areas such as East Loch Lomond and the Trossachs and the Friends role as a pressure group. Again concerned about the negative comments on traffic movement when there are potential solutions that can include improved traffic management and better off street provision for cars as part of settlement plans that don't weaken the viability of local businesses which are major employers.

Page 22. We support the development of outdoor activity hubs and consider the Tarbet/Arrochar area should be added to the list for priority consideration. This is the area which was home to the formation of Scottish Mountaineering Club. It is an area identified as a priority for developing walking by Forestry and Land Scotland and we are aware there are plans being developed for a watersports hub at Tarbet. The area has great potential as an outdoor activity hub as part of much needed wider regeneration efforts. Businesses should feature in the list of delivery partners too.

Page 23. Map 3. We are concerned that the focus in this map is solely on walking and cycling opportunities given the vast stretches of water available with potential for encouraging a range of quiet watersports activities such as canoeing, boating and diving. The head of Loch Long for example is already a well used area for diving and this could be developed further.

Happy and Healthy People

We support the vision as set out page 25 but are disappointed to note the very limited number of actions which we are not convinced are sufficient to make the step change in delivery required. Surely this is where there could be a specific action relating to working with Outdoor Education Centres and outdoor recreation providers to reach more disadvantaged and young people.

There are many examples of good practice including the recently formed partnership between Children 1st and Ardroy Outdoor Education Centre to deliver an innovative Children in Need Programme with circa £350,000 from the STV Children's Appeal Fund. This is a programme targeted at families with special needs in Central Scotland. Similarly, the Friends are currently working with youth and support services in West Dunbartonshire to provide over 300 children in socially deprived areas with adventure and environmental education breaks in the National Park. **Please** strengthen the range and number of actions to achieve higher penetration levels and outputs.

Page 26. The health partnership is welcome but there requires to be some specific targets and outcomes which make a real difference. As mentioned earlier the Friends are actively working with a number of groups in this area to deliver practical interventions that overcome barriers around transport and access to outdoor recreational activities in a structured way. For action 10 there is also potential to work with the Callander Youth Project that covers the MacLaren High School catchment area.

Page 28. While the delivery principles are fine in as far as they go there is a distinct lack of targets on scale of reach and it would be helpful to try and spell this out more clearly. Is the plan aiming to assist a couple of hundred people or is the ambition much greater? It is not clear from reading the text in this section or indeed in other sections what the targets are in terms of numbers.

Page 29. Map 4. We are surprised to see such a limited area of focus and there is no mention of potential locations to expand Walk in the Park locations. There surely must be some ambition for the National Park to contribute to the happy and healthy people agenda in areas such as the Glasgow conurbation and nearby Forth Valley area to the east of the Park.

Connecting Places

The vision on page 30 should be modified as simply having a connected network of paths and waterways falls well short of what is required to ensure people can easily connect with a range of outdoor activities. It is also important that there are better connections with communities inside and outside the Park and improved public transport connections as well as featuring strategic paths and waterways.

We agree "there needs to be a functioning network of active and public transport options which complement each other" but are disappointed the proposals for public transport improvements are so vague and limited in this section. Some bolder pilot public transport initiatives should feature in this section.

Page 31. Balmaha is not the only location suffering from negative peak period issues associated with high volumes of visitors arriving by car and the situation has not been helped by the removal of a large number of car parking spaces on East Loch Lomondside with no improvements in providing attractive public transport services. The heart of the Trossachs in the Ben A'an/Loch Achray/Loch Katrine corridor is also an area suffering from high volumes of visitors arriving by car with an inadequate supporting infrastructure. It is not uncommon for excessive roadside parking and congestion to take place at weekends throughout the winter months as well as the main holiday periods. The complete lack of public transport here has not helped the situation and we believe there would be merit in piloting eco transport services in the Trossachs and initiatives such as this should feature in the Outdoor Recreation Delivery Plan. Interestingly 25 years ago the innovative 'hail and



stop' Trossachs Trundler carried over 10,000 passengers in one season and more recently the 4Bs service on West Loch Lomondside was very successful but, disappointingly, funding support was withdrawn after 3 years. The same happened with the innovative Breadalbane Explorer service. Initiatives such as these need to be re-introduced but with longer term funding support to ensure their success and sustainability.

Page 32. We support the proposals outlined under Action 13 but we would encourage the NPA and partners to explore the creation of a safer path and cycle link between Balloch and Drymen as the current NCN7 is unsafe and not family friendly. More off road routes which are family friendly in areas with heavy vehicular traffic movements are required. In this context we welcome progress with the long awaited cycle path connection between Callander and Stirling.

Throughout our submission we have made a number of references to the need for better transport services. As you would expect we consider the proposals under action 14 fall well short of what we believe is required if the wider objectives of the Outdoor Recreation Delivery Plan are to be met. While we are not great advocates of producing yet more plans we do think the time has come for the development of a National Park Transport Action Plan to try and bring more focus to this topic. Practically every Community Action Plan produced by local communities refers to deficiencies in public transport services and the need for action is now more urgent given the climate change emergency. Sustainable and low carbon transport should feature heavily in any action plan developed. In the meantime, in the absence of a dedicated action plan, surely there is scope in this section of the Outdoor Recreation Delivery Plan to at least suggest piloting some eco public transport services in areas such as the Trossachs.

Page 33. An interesting proposal but likely to be limited in scope due to poor public transport coverage in large parts of the National Park. Worth piloting at a sub area level where there are sufficient public and water based transport services. Should tighten up proposal and run with a pilot in a specific area of the National Park.

Page 34: Map 5. Again Helensburgh ignored! What about potential of the existing and potential new ferry connections and services on the Clyde and Clyde sea lochs. A new planning application by Pelham Olive for Portincaple has some interesting potential with respect to a desire to reinstate historic ferry crossings to Ardoil and Carrick. Some proposals have also been mooted in the recent past to introduce cruises linking Arrochar with communities around Loch Long and Loch Goil. There should also be a specific policy/action heading relating to waterbus services and the need for investment in the pier infrastructure as a key component of improving connectivity by water.

Exploring Further

We welcome the focus on the six great trails that meander through the National Park and the acknowledgement of the myriad of historic paths. We also welcome the brief mention of other unusual outdoor activities that can be undertaken in the more wild land areas within the National Park. We would hope the National Park will support the efforts of the Friends, HADAT and Luss Estates to create a Great Trail route on the west side of Loch Lomond. We would suggest there is also some scope for specific proposals for Glen Croe and Glen Kinglass.

Page 39. Again short on practical detail on how this will be done. HADAT's Three Lochs Way guide book gets no mention yet it is an example of exactly what is being envisaged. Also the Friends have supported the production of a series of walks leaflets developed by communities with future printing costs being met by income from cover charges. It is important there is a suite of route cards/leaflets. Visitors do not object to paying a small cover charge which should ensure they can be provided in a cost effective way. Not everyone wanders around the National Park glued to walks apps on their mobile phones!

Coasts and Water

We are supportive of the vision and the sentiments expressed on pages 42 and 43 but are concerned about the lack of specific comprehensive proposals to deliver the vision. There are only three actions identified and some of them are fairly broad in scope. In recent years the investment in waterside access infrastructure has been very limited and this needs to feature more strongly in future investment programmes e.g. upgrade of Loch Lomond piers and provision perhaps jointly with local communities and the private sector in pontoons/boat launching points.

Page 44. We welcome the proposal to invest in a park wide "into the water" infrastructure - see the comments above. Outdoor Education Centres and businesses have a role to play as delivery partners and should be added to the list.

Page 47 Map 7: Misses out the popular waterfall at David Marshall Lodge. Why no mention that some of the best access to the National Park's coastal waters is at Helensburgh, Clynder and Cove? Need to feature watersports opportunities more around the Clyde Sea lochs area. Also we consider there is a need to improve access to water elsewhere, e.g. at Duck Bay, Aldochlay, Tarbet and Arrochar.

Page 49. As mentioned early in our response we are concerned at how 'light' the indicators of success are and we consider there is a case for strengthening this section. The base lines referred to should also be specified so that there is greater understanding and transparency about what the plan is hoping to achieve. There is scope for some specific targets on increased public transport use and the introduction of pilot services. There should also be some targets about increasing participation targets amongst disadvantaged groups and individuals in, and out with, the National Park.

We are also concerned there are no specific references to the scale of resources - capital and revenue - to ensure the Outdoor Recreation Delivery Plan makes a real difference. We appreciate the challenges involved with this but it would be useful to give some broad order of scale. Will the delivery plan result in say £5 million of investment and 500,000 more people participating in outdoor recreational activity in the National Park during the plan period?

We trust our comments will be considered as being constructive and some of our suggestions find their way into the final adopted plan.

Good luck in finalising the final version of the document for adoption by the National Park Authority and the various partners mentioned. Thanks also for giving us the opportunity to meet with you a couple of times during the preparation of the draft plan.

Yours sincerely,



James Fraser

On behalf of Friends of Loch Lomond and The Trossachs

Working for the benefit of people and nature in Scotland's first National Park