



NPPP Public Consultation
Loch Lomond and The Trossachs National Park
Carrochan,
Carrochan Road,
Balloch
G83 8EG

Monday, 3rd July 2017

Dear Sir/Madam,

I am writing on behalf of the Trustees of Friends of Loch Lomond and The Trossachs, to confirm we are generally supportive of the contents of the draft National Park Partnership Plan for the period 2018-2023 but we have a number of observations to make which we trust will be taken into account when the final version of the Partnership Plan document is being prepared for 'sign off' by the Park Authority Board and the Minister for the Environment on behalf of the Scottish Government.

We of course had the benefit of providing some detailed input at the full day workshop organised early in the Park Plan development process so we will restrict our comments here to substantive points or specific issues we would like greater priority placed on in the implementation process.

THE STRATEGIC CONTEXT

At a strategic level we are supportive of the focus for the next five years as detailed on page 6-9 of the draft Park Partnership Plan (PPP) and recognise the National Park and its various partners have an important role to play in addressing issues and opportunities within the National Park while contributing to the delivery of national priorities. However, we do have some concerns about the following:

- (i) the large number of priorities identified (50 in total) against a backdrop of public sector revenue and capital funding declining significantly in real terms which is likely to be exacerbated further with the disappearance of European structural funds during the plan period. We would have preferred to see a tighter list of around 30 priorities (10 per strategic theme) with the limited resources likely to be available targeted at those priorities that will make a real difference in delivering the vision and outcomes;
- (ii) the lack of reference to the resources required for delivering the identified priorities and outcomes. It is important that the funding requirements and funding context features somewhere in the final version of the PPP as there is little or nothing on this in the current version of the PPP which we consider is a major weakness. Clear SMART principles should be adhered to in taking the PPP from draft to final version which would greatly help to present the case for more resources to be targeted at delivering the various priorities and outcomes by the partner agencies;
- (iii) no mention of the impact of the cross-agency reduction in resources in real terms being targeted at the maintenance of the basic infrastructure of the National Park with poor and uncoordinated litter management services, poorer public toilet provision, deteriorating piers around Loch Lomond and poorly maintained public car parks and public realm at many honeypot locations. The fabric and quality of the public infrastructure has deteriorated significantly over the past decade at a number of locations throughout the National Park. However, there have been some notable successes in the Trossachs area as a result of the NPA securing special Scottish Government funding for 'shovel ready projects'. This is clearly



an issue that requires to be addressed in the new PPP with more emphasis being placed on a 'back to basics agenda' as part of delivering the vision for the National Park;

- (iv) the lack of recognition of the potential role of the private sector and, in particular, local businesses who have an important stake in helping to deliver the visitor experience and rural development visions and outcomes. They should be recognised more fully as delivery partners and feature more in the list of those involved in helping deliver specific outcomes and priorities;
- (v) while we recognise the importance of tourism and recreation to the economy of the National Park there are very few references to other sectors of the rural economy and this should be addressed in the final version of the PPP. It is important more efforts are made to diversify the rural economy and some bold actions require to be identified, perhaps with the assistance of Scottish Enterprise and Highlands and Islands Enterprise, who hardly feature as delivery partners under specific rural development and visitor experience outcomes and priorities in the current version of the PPP. We consider these agencies should be tasked, along with local authorities, in helping to deliver a more diversified rural economy and sustainable economic growth. They should also have a role in helping to deliver improvements to the public realm in places other than simply Balloch where Scottish Enterprise has a longstanding interest through their ownership of West Riverside and involvement at Loch Lomond Shores.

CONSERVATION AND LAND MANAGEMENT

We agree with the conservation vision and the 4 conservation outcomes which will help deliver the Wild Park strategy and action plan that has achieved considerable success in recent years.

Under C1 we suggest the Friends are added as a supporting delivery partner given we are a conservation and heritage charity and operate a successful visitor giving and volunteering scheme that supports conservation projects including tree planting, the Cowal Red Squirrel initiative and the red squirrel trail and interpretation at Balmaha.

Under C2 we welcome the references to the importance of continuing 'to provide good lines of sight to the stunning views of the iconic landscapes found here' but are disappointed there are no specific actions identified to maintain or improve views from scenic routes which are such a key feature of the National Park. We suggest a specific action relating to the selective removal of stretches of trees and shrubs along scenic routes should be included in this section. There is scope to build on the previous joint 'views from the road' tree removal initiative developed for stretches of the A82 by the Friends with support from the NPA and Transport Scotland. Further work is also required to capitalise on the national scenic routes initiative that was successfully piloted by the NPA.

The Friends of LL&T and the Friends of the West Highland Railway should both feature in the support delivery partners list if views from key transport routes feature in the final version of the PPP.

Greater clarity is required for conservation priority 3 as it is not obvious from the current text how the NPA and its partners will conserve and enhance qualities of wildness and cultural heritage features. The current proposed action is too broad and general.

We support conservation priority 6 but suggest the wording is altered to recognise the importance of loch shores for conservation and quiet recreation purposes.



The Strahard Ecoservices project is featured under C3 and under conservation priority 7 mention is made of working **with communities** to build resilience and mitigate against climate change impacts by undertaking various initiatives yet under the list of lead delivery and support delivery partners there is no mention of the Community Partnership or local communities. This is a serious omission and should be rectified in the final PPP.

VISITOR EXPERIENCE AND OUTDOOR RECREATION

We consider this section should re-badged to include a specific reference to outdoor recreation (see above). This would help align the PPP more clearly with the NP's objective "to promote understanding and enjoyment, including enjoyment in the form of recreation, of the special qualities of the area by the public" and help counteract recent criticism from some recreational bodies that providing recreational opportunities for all is not a high priority for the NPA and its partners.

We agree with the visitor experience vision as it places an emphasis on providing high quality and authentic experiences for visitors from all backgrounds. We also agree with the four outcomes proposed to focus efforts on although we would like to see a reduction in the number of actions from 20 as there is a danger of resources being spread too thinly and not making a major impact on some of the higher priority and higher impact actions. There is scope also to merge some of the actions and cross reference more to the existing recreation plan that is currently being implemented by the NPA with support from others.

VE2 could perhaps be modified to read "There are **better and** more opportunities to enjoy water-based recreation and...". There should not simply be an emphasis on creating more opportunities at the expense of investing more in enhancing existing opportunities with, for example, upgrading existing piers and providing shelters for the hundreds of thousands of visitors enjoying boat trips on lochs throughout the National Park.

The text in VE1 is very misleading as it gives the impression the NP is aiming to have a wide variety of outdoor recreation opportunities when all the supporting text and six supporting priority actions focus solely on walking and cycling. While walking and cycling are important there needs to be an acknowledgement there are other forms of outdoor recreation that will be nurtured and encouraged in the National Park. More passive activities such as sightseeing and picnicking are important activities in the National Park as are activities provided by Outdoor Education and Recreation Centres and various activity providers.

The list of walking and cycling actions could be simplified and cross referenced to the Recreation Plan where there are also references to a wider range of sports and recreation provision. Reference to a broader range of outdoor activities is sadly lacking in this section. If the priority is to simply focus in on paths then the wording in the VE2 outcome should be more specific.

Under support delivery partners for path related initiatives the Friends should be listed as we have invested heavily in the promotion and development of paths over the last 5 years through Friends of OUR park voluntary visitor giving and volunteering scheme. We are also committed to raising £20,000 from visitors to support the Mountains and the People project and have recently agreed to partner with Luss Estates to progress a Luss Quarries circular path project and with Helensburgh and District Access Trust we are promoting an ambitious Luss Glens Paths project which is likely to feature in a multi-million pound bid to OFGEM by the power companies shortly. We are also financially supporting the production of a range of paths booklets and maps being developed by local community groups.

Under VE2 we welcome the acknowledgement of the need to invest in infrastructure to grow water-based tourism in the Park but it should also be noted there is a need to upgrade the existing



infrastructure to ensure existing and future visitors have an enjoyable experience. We would like to see a specific action relating to taking forward a piers, pontoons and shelter initiative as the quality of the current infrastructure is poor when compared with international destinations. Private boat trip operators and trusts are investing heavily in new and upgraded boats and are attracting many hundreds of thousands of visitors on boat trips despite the poor condition of the piers around Loch Lomond, Loch Katrine and the Clyde Sea Lochs.

If we are serious about delivering a world class visitor experience then a good starting point would be to invest in an initiative like this through genuine collaborative working with boat operators. Around Loch Lomond it would be helpful if the rental income generated from pier dues was reinvested in pier upgrading and associated shelter provision.

Under VE priority 8 Loch Katrine should be added as there are plans to upgrade derelict piers and shelters there with a scheme for Brenachoile Pier recently securing European Leader funding support. As mentioned earlier the emphasis should also not simply be on providing more accessible boating and recreational facilities but also on much needed upgrading of what we already have.

Under the 'who can make this happen' local businesses and trusts should be added. The NPA needs the private boat operators and Trusts such as the Steamship Sir Walter Scott to improve and develop the waterbus network. Surprised to see SportScotland as the lead partner given their lack of involvement in provision to date but if this is a coded way of putting them 'in the hot seat' to help deliver funding to develop the water based recreation infrastructure provision then fine.

We are pleased to see under VE3 there is a reference to the "significant opportunity to make more of the Park's rich landscapes and the wide range of recreation experiences.." as the Friends are currently working on an eco-tourism initiative with funding support from Scottish Enterprise and this will continue for part of the period covered by the PPP. The Friends should be added to the list of support delivery partners.

Under VE priority 13 reference is made to a suite of actions including investing in digital visitor information and contemporary marketing. We would suggest 'contemporary' should be replaced by '*relevant and user friendly marketing*' as there is still an important role for 'on arrival print' given the mix of markets currently attracted to the National Park and the substantial gaps in access to wifi and mobile phone signals in large parts of the National Park.

We are surprised that **individual local tourism businesses** do not feature under either the lead delivery or support delivery partners given they will be directly responsible for investing in the range of visitor offerings and will be responsible for day to day management. Destination Business Groups are mentioned but it should be noted that some of these groups are currently fragile and the future of some of them is uncertain due to lack of public sector funding. There is perhaps scope to strengthen the Destination National Park Group to help drive forward some of these initiatives but in reality it will be down to the efforts of individual businesses to deliver a thriving visitor economy.

We note there is a reference to the Scottish Futures Trust as a lead delivery partner. This perhaps needs some explanation as we are not aware of this Trust supporting the range of priorities identified under VE3 in the past.

Under VE4 given the nature of the actions featured here we would suggest the list of local delivery partners is extended to include the Your Park Stakeholders Group, Loch Lomond Association and the Friends. LLA has already made a positive contribution to promoting responsible use of the Loch Lomond islands and the Friends have made practical inputs to VE priority 14 and 15 and we would hope to continue to do so.



On the litter front we have organised voluntary litter picks at key blackspots. We are also actively lobbying for litter management to be better coordinated and resourced with the provision of adequate litter bins which are emptied more frequently at busier visitor locations such as Luss, Balmaha and Arrochar as well as along busy trunk routes such as the A82.

The wording in VE priority 16 would benefit from being changed to better capture the nature of the priority. Suggested wording ***“Introducing better co-ordinated and well-resourced litter management arrangements at busy visitor locations and along heavily used visitor corridors such as the A82, including marine litter on Loch Long”***.

Support delivery partners should include Community Councils as a number have been active in helping to address litter issues.

We would agree with the comments under VE5 as there is considerable potential to develop and provide more opportunities for young people in nearby urban areas to visit, enjoy and learn about the Park. There is still a long way to go in targeting young people and engaging them effectively in recreational and educational opportunities in the National Park and this is an area which requires more resources allocated to make a real difference in terms of scale of penetration levels.

RURAL DEVELOPMENT

We agree with the vision for rural development which captures in a few words the essence of what we should be collectively aiming for with thriving businesses and communities in a high quality environment. We also agree with the 4 rural development outcomes but would suggest RD3 is modified to include a reference to providing more affordable housing. Housing is mentioned in the text on page 38 but doesn't appear as part of the RD3 outcome which we consider is unfortunate. Revised RD3 could read ***“Population decline is being addressed by attracting and retaining more skilled working age and young people and providing more affordable housing within the National Park.***

Generally the number of actions could be reduced and simplified as there is some duplication and overlap.

Rightly there is a reference under RD1 to the considerable effort made by the NPA and the Community Partnership to engage effectively with communities through charrettes and community action planning over the past 5 years and we believe the emphasis should now be on helping to secure the necessary funding to deliver the actions and designs articulated in the various plans that have been produced. There are some opportunities to secure funding from local authorities, City Region Deals and Sustrans for some of this work but we consider this should be augmented by SE and the NPA to ensure an ambitious programme is delivered over the next 5 years. Some of the smaller villages such as Arrochar, Drymen, Aberfoyle and Balmaha would also benefit from some public sector support for public realm/townscape enhancements.

There is some duplication in RD priorities 1 and 2 with communities such as Callander, Arrochar and Balloch mentioned twice. There is scope to merge both these priorities. We agree there will be a need for some prioritisation but this should be augmented by a village improvement grant scheme grant scheme with grants of £10,000 -£50,000 for community led public realm improvement schemes. This would make a real difference in communities such as Balmaha, Drymen and Aberfoyle.

When public realm improvement schemes are being considered it is important the needs of local businesses are listened to and acted upon as there is a danger of some schemes reducing car parking close to businesses which could undermine their viability. This fear was widely expressed



by businesses in Balloch as part of the recent LIVE PARK consultation exercise on design options for the main street and station square.

We welcome the inclusion of RD priority 9 as in the past rural development strategies for the National Park have tended to focus on tourism-related businesses and there is an urgent need to diversify the rural economy. The provision of workspaces and small industrial/office units will help achieve this. We are impressed by the efforts that have been made by the likes of Atholl Estates in the Cairngorms National Park to provide a cluster of workspaces on the edge of Blair Atholl which enjoys high occupancy level and this would be a good case study to consider in taking forward any initiative in the LL&TNP.

We welcome the emphasis on skills development and the reference to the success of the now defunct Skills Partnership which enjoyed some success during the limited timespan of its existence. It was very unfortunate that the short-lived Skills Partnership could not be sustained due to lack of funding support and it is important lessons are learned from this initiative which took a considerable amount of time and effort to establish in the first place.

Priorities 11-13 which all deal with skills could be easily wrapped up into one all-encompassing skills priority and it is questionable whether the NPA's own requirements under the Developing Young Workforce agenda should be singled out for specific mention-surely this should relate to all the public sector partners and efforts should be made to engage local businesses in this too.

We welcome the plans to continue supporting the Community Partnership and communities under RD4 as there is likely to be more reliance in the future on local communities delivering actions that improve their quality of life and place. Increasingly with new legislation empowering local communities there will be a greater move to communities owning and managing assets such as car parks which we consider would be a positive step forward in enhancing the quality of village environments and particularly if they are linked to income generating opportunities to support the re-instatement of village officers and other public realm improvement initiatives.

We trust these comments on the draft PPP will be considered carefully and help influence the final document that will go before the Park Board and Environment Minister for adoption. We also hope that the final PPP will have a strengthened section on funding and proves to be a useful document in helping to secure much needed additional resources to deliver the vision for the National Park.

Yours faithfully,

James Fraser
Chairman