



31st October, 2012

Dear Sir/Madam,

Draft Outdoor Recreation Plan - Consultation Response

In our role as the only truly independent conservation and heritage 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 5 year Outdoor Recreation Plan.

Part of our recently updated vision is to ensure the Park realises its potential as one of the world-wide family of National Parks by nurturing and celebrating the Park's rich and diverse natural and cultural heritage and this is underpinned by a raft of strategic priorities and priority activities many of which relate to people enjoying the National Park as a recreational and educational resource in responsible ways. We therefore welcome the production of the Outdoor Recreation Plan with a series of actions and aspirations but hope to see more of the aspirations converted into specific actions and commitments in the final adopted plan, and linked to specific resource allocations to improve recreation provision within the Park during the next 5 year period.

We are generally supportive of all of the proposals contained in the draft Plan but believe there is a need to be more ambitious in some areas of activity such as making more of the scenic routes (road and rail) in the National Park and having a more comprehensive set of actions to promote outdoor recreation opportunities more effectively working in partnership with VisitScotland, Scottish Natural Heritage and local trade led destination organisations. We will amplify on this further and highlight some other issues below. It should be noted that while we are supportive of all the proposed actions and aspirations it is not our intention within the confines of this response to comment on them all. We will restrict our comments to what we consider are some priority actions and some areas we recommend for strengthening actions to support the delivery of better outdoor recreation experiences in what is Scotland's most popular countryside destination.

Section 1 - Scene Setting

We support the overall goal set out to increase and widen outdoor recreation by the public in the National Park in carefully managed ways and welcome the emphasis throughout the Plan on improving existing outdoor recreational provision and providing some additional recreational opportunities. However, we are concerned that the packaging and promotional activities set out in 3.2.1 and 3.2.2 require to be significantly strengthened otherwise this desirable goal will not be achieved. Also we are concerned that nowhere is there is a quantification of existing recreational activity and by type in the Park and where the Park Authority and its partners aim to be in terms of changes in outdoor recreation participation levels after the proposals detailed in the Plan are implemented. Notwithstanding the challenges in quantifying outdoor recreation activity levels, more requires to be done to strengthen monitoring and outputs from the planned investment. In this context we welcome the plans for the installation of a more extensive people counter network as set out in 5.2.

In the final plan we suggest it would be useful to include some references to the National Park's strategic importance as Scotland's most popular outdoor recreation resource and one of the key priorities being to improve the quality of provision to cater more effectively different user groups in sensitive ways which respect the special natural heritage qualities of the Park. This doesn't come through in this scene setting section despite there being some references to the wider strategic context documents such as the Park Partnership Plan in section 1.4.1. Incidentally, the Tourism Framework for Change strategy document has been superseded by a new national tourism

Strategy policy document and we would suggest you update this section in the final published plan. It is also important the plan takes account of some of the strategic threads referred to in this document though we appreciate this may be taken account of the National Park's emerging tourism strategy which presumably will be the subject of public consultation at some stage.

Section 2 – Recreation and Access

2.1 We are pleased there is an emphasis in focussing on gaps in provision. We also welcome the efforts to provide for all abilities around hubs and more remote areas.

2.2.1. We are interested to note in this section reference is made to three types of footways the Park Authority will work with partners on but we are concerned this could lead to an over emphasis on paths alongside highways when higher priority should be given to improve and create safe and attractive 'away from highway' paths. We also agree that some key actions (and also aspirations being converted into actions) in the southern area of the Park could provide viable and attractive walking and cycling alternatives between communities. This is particularly the case between Balloch and Gartocharn where we are currently working with others to consult on draft plans for completing a safe and scenically attractive 'away from highway' access route via Balloch Castle Country Park, Whinney Hill, Ross Priory Wood and the Aber Path.

2.2.2. While we are broadly supportive all 6 actions and the 1 aspiration listed in this section we would question if the ambitions are set at a high enough level as some of the footways are alongside very busy and heavily trafficked roads. We would like to see much more emphasis on exploring 'away from highway/traffic free' alternatives such as what is planned between Ardentenny and Blairmore. The Gartocharn to Balloch footway proposal alongside the busy and twisty A811 does give us some cause for concern on safety grounds and there are also better alternatives worth exploring for safe Drymen to Balmaha footway links too.

2.3 We support all the actions in this section but consider that more requires to be done to better signpost all types of low level access routes and trails as there are many paths which are 'hidden' from visitors and some locals without the relevant knowledge and map reading skills. We have fallen well behind other parts of the UK and Europe in this regard despite having an impressive array of walks maps and leaflets. There should be a specific new action under 2.3.6 - Improve signposting of walks and trails to raise awareness of their existence and ensure they are available for use by everyone. Comments apply to this section and section 2.28.

2.5.2. We support Action 15 and Aspiration 3 as part of the wider countryside management efforts to ensure there is better provision for campers in the Park.

2.7.3 We are supportive of the Upland Paths Project though there is no information in the Plan about what this entails and priorities for action during the five year period the Plan covers. We would suggest this is rectified in the final Plan.

2.8.2-2.11.26 While we support the extensive list of actions and aspirations detailed in there is potential to include Ardgartan/Argyll Forest/ South Cowal as secondary cycling hubs as there is a wide variety of routes available with spare capacity away from some of the existing honeypot locations in the Trossachs. There are a number of weaknesses in the current cycling network for safe use by families and this is particularly the case in the southern sweep of Loch lomond between balloch, Drymen and Balmaha and more needs to be done than simply upgrading footways for multi use beside busy highways.

2.14.1 We welcome the wheelie boat project (Action42) and would be interested in being kept informed of developments as this could be a potential project to benefit from some of our fundraising activities given what this initiative aims to achieve in improving access for fishing in the Park for wheelchair users.

2.17-2.18 We are supportive of all the actions and aspirations in this section and recognise the economic benefits that could be generated by having better provision for horse riding .

2.19 All the actions and aspirations for kayaking and canoeing are supported and we would particularly like some priority to be given to improving fit for purpose kayaking and canoeing access and egress points as identified in a number of the specific actions/aspirations.

2.21 We support the actions/aspirations to improve cruising mooring facilities around Loch Lomond in key locations such as Balloch for visiting boats. A number of areas such as the River Leven in Balloch have mooring facilities but they are restricted to club members only which means visitors to the loch have limited options available and the economic spin off benefits for local businesses are not being maximised.

2.28-2.31 We are very supportive of all the actions and initiatives to improve and develop path networks and related signing and promotional activities to improve the quality of walking experiences throughout the National Park for local residents and visitors. We welcome all the proposals for improving walking options at visitor hubs and are happy to be involved in supporting improvement schemes at locations such as Bracklinn Falls through the Friends OUR Park visitor giving scheme.. Similarly we are very supportive of measures to improve existing and develop new long distance routes and great trails in the Park. We have financially supported improvements to the Three Lochs Way and the Rob Roy Way and we are keen to see some further investment in upgrading the Cowal Way to take it up to Great trail standard. We support the plans for the imaginative Sea Lochs Trail and John Muir Way and we are currently exploring the potential to route this latter project on a new and improved scenically attractive walk between Gartocharn and Balloch.

We are very supportive of the Aspiration 57 and would like to see this being converted into a specific action. It is of strategic importance and is just the type of project that should be progressed to address strategic gaps in long distance route provision which also addresses some of the weaknesses in safe 'away from highway' provision for local residents. Completing the missing links in the circular path network would open up what are undoubtedly some of the finest views in the Park. The Great Trossachs Path also is a worthwhile project to support as is the creation of an off-road link between Brig o'Turk and Kilmahog as part of this scheme.

3. Sustainable Activity Promotion

3.2 This is currently the weakest section of the Plan and given the importance of the National Park as a national and local outdoor recreational resource we strongly recommend that a more robust and comprehensive promotional plan should be developed with sufficient resources allocated by partners to support implementation. Perhaps at this stage there should simply be an action as follows : *Develop an activity promotional plan which reflects the importance of outdoor recreation in the Park and its future potential.*

The four actions listed while worthy of support fell well short of what is required for Scotland's most popular countryside destination. It would be interesting to see the total cost of the proposals set out in this draft Plan and to compare this with the promotional budget that arises from the four actions listed. This we are confident would demonstrate the wholly inadequate nature of the promotional budget which should involve a range of promotional techniques and take account of areas and activities that are sensitive to too much promotion. More specific actions are also require to promote responsible outdoor recreational opportunities in the Park and to get over key educational and inspirational messages. There should also be some focus on working more effectively with national agencies such as Scottish Natural Heritage and VisitScotland as well as the existing local destination marketing groups to ensure efforts to showcase the vast array of outstanding recreational opportunities in the Park are better coordinated and improved. It should be noted we welcome the efforts made in recently to strengthen the promotion of outdoor recreation on the National Park's own website.

3.3 Actions in this section should be more extensive and specific given the potential of the Park to host outdoor recreation events.

3.4 We support the actions and aspirations listed under the sustainable transport heading. And agree more could be done to ensure there is improved and better promoted access from a number of key gateways. We would also suggest that Gourrock is an important maritime gateway to the Park with the high volume ferry service. The importance of railway stations on the periphery of the Park (eg Helensburgh) and within the Park along the West Highland Way should also be recognised here and there is scope to work more effectively with both bus and train operators to promote ways of accessing the Park for outdoor recreation.

An extra specific action should be added relates to the pier infrastructure in the Park. The quality of provision is currently variable and requires further investment to ensure the piers are fit for purpose and it is easier to access passenger boats of different sizes. In some instances lower platforms are required and other piers such as Balmaha are still in a very poor condition. There is also considerable uncertainty over the future use of Balmaha Pier for passenger boat services that requires to be addressed. Finally, there are some gaps in provision at busy tourist locations such as Arrochar on Loch Long and Loch Lomond Shores and small scale provision such as that developed by the private sector at Rowardennan recently should be encouraged at other locations to make Loch Lomond more accessible and visitor friendly for this type of appealing and sustainable transport.

3.5 We welcome the proposals to create outdoor sports hubs but consider there is also potential to do this at more locations than those listed eg Lochgoilhead where voluntary efforts recently secured the long term future of Ardroy Outdoor Education Centre. We consider there is great potential to work with outdoor education centres and private sector outdoor education providers to improve life chances and experiences for children and others and would suggest some more actions relating to this should be incorporated in the Plan.

4. National Park Scenic Routes

We welcome the inclusion of this section in the Plan as one of the major challenges facing the National Park relates to being a series of busy through routes to more distant destinations with the opportunities to encourage travellers to stop, stay and spend in the Park and enjoy its scenic splendours more not being capitalised properly unlike some of our international members of the National Parks family eg Canadian and US Parks. This is not helped by the fairly 'blinkered' view taken by Transport Scotland and others on road design and a failure to capitalise more on the views by creating more and safer stopping off places and viewpoints and tackling roadside tree management issues which lead to unattractive 'tree tunnels' being created along stretches of trunk roads such as the A82 south of Tarbet. The organisations which preceded the National Park recognised the importance of creating improved stopping off points at key locations such as Tarbet, Firkin, Inveruglas and Luss with improved pull in facilities and we understand some further improvements may be secured by the Park Authority as part of the next phase of upgrading the A82 and the implementation of the Five Lochs Management Plan but there are still some significant gaps in provision of safe off highway pull ins with supporting facilities such as toilets. Some existing pull in/picnic areas also have shortcomings. For example, at Duck Bay where over 400,000 visitors can stop in a good summer has no public toilet facilities which we believe should be addressed as part of the Plan.

We agree the A82 has 'the potential to rank alongside some of the world's greatest roads if a suitably ambitious and creative approach is adopted' and we welcome the efforts made by the Park Authority to get Transport Scotland to re-think their plans for the Tarbet to Crianlarich stretch of the A82 improvement scheme. However, we would strongly urge that this should not be to the exclusion of securing further improvements along the busier stretch of the A82 south of Tarbet where there is scope to manage the route- eg sign maintenance, views of the loch and stopping off points - to a much higher standard. We would like to see specific actions listed in the plan related to the following:

(i) removal of stretches of the Loch Lomond 'tree tunnel' to open up more views of Loch Lomond and to introduce a more regular tree and shrub management regime to retain these views and also ensure the Loch Lomondside cycle route is safer and more appealing;

(ii) review the options to provide toilet facilities at Duck Bay (there is private sector interest in helping to deliver improvements here);and

(iii) introduction of an improved signing and related maintenance and cleaning regime.

We are disappointed there is no mention of the scope to improve stopping off/viewing points alongside the A84/A85 and attractive routes such as the A815 Loch Eck Road which also have potential to enhance the visitor experience and extend dwell times.

We support the actions listed under the West Highland Railway line but would recommend consideration is given to explore the potential to introduce scenic observation cars to the route as has been successfully done with the Rocky Mountaineer in Canada and secondly, we believe an action should be added to maintain views at key points along the route with regular tree and shrub management regimes as opposed to having to rely on 'one off' interventions by the Friends of the West Highland Railway.

5. Monitoring

5.1 We entirely agree with the sentiments expressed here about placing more priority on monitoring activity. This has an important role to play in helping to demonstrate value for money and securing ongoing investment in the future. We also strongly recommend that more investment should be made in a more organised and systematic raft of visitor/activity user feedback activities. There is more potential to capture feedback from Park staff on the ground and staff and owners of businesses who are in daily contact with visitors as well as local community groups and individuals. More regular surveys, online feedback mechanisms, focus group discussions and other techniques should be introduced as part of the drive to ensure the National Park truly is an exemplar in quality outdoor recreation provision.

5.2 We support the introduction of a more extensive network of people counters but this on its own is not enough given we are dealing with Scotland's most popular countryside destination (see above).

5.3 We also endorse the measures recommended for monitoring the success of the Outdoor Recreation Plan and are pleased what is envisaged goes further than merely going through a tick box exercise linked to specific actions. Evaluation of participation levels is welcome but it is not clear how this is going to be achieved and should there not be a regular evaluation of user satisfaction levels too? Evaluation should feature qualitative issues as well as it is simply not a 'numbers game' if we are collectively going to deliver the vision set out in the Park Partnership Plan.

Finally, congratulations on the efforts that have gone into developing an Outdoor Recreation Plan so far with an extensive number of specific actions and aspirations listed. We sincerely hope that our constructive comments and suggestions for strengthening the final version of the Plan are taken on board and we look forward to supporting the Park Authority and other partners in the delivery of the final agreed actions that fit well with our aspiration to ensure the National Park is a better place for people and nature.

Yours faithfully,

James Fraser
Chairman