



Loch Lomond & The Trossachs National Park Authority  
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19 July 2023

Dear Sirs

### Response to National Park Plan consultation

Ramblers Scotland is pleased to have the opportunity to comment on the draft national park plan. Ramblers Scotland is recognised by **sportscotland** as a governing body of sport and we are a membership organisation and a charity with a grassroots network of 56 local groups, running 3,500 group walks a year which are all led and organised by 1,300 volunteers. We work to ensure that everyone, whatever their background or ability, benefits from the joy of walking. We have a number of groups based around the national park with some members of these groups living within the boundary. These include groups in Helensburgh & West Dunbartonshire, Mid Argyll & Kintyre, Lochaber & Lorn, Perth, Stirling & Falkirk and Bearsden & Milngavie. Many more of our members from across Scotland enjoy visiting the national park for walks and other activities.

### General comments

We are pleased to see the commitment within the park plan to make a step change in the way the park responds to the nature and climate emergencies. We fully support a transformation in the way the land is managed and used in order to ensure the long-term sustainability of the park and the wildlife and habitats within it.

One of the four aims of the national park is:

*to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public*

This is the aim which is most relevant to our interests, and reflects the majority of our comments, but we will also comment on other aspects of the plan which are relevant to outdoor recreation and walking in particular.

Overall, we feel that the aim above should be more strongly reflected in the objectives and policies within the plan. We specifically recommend that the national park develops an **Outdoor Recreation Plan** (ORP) following the publication of this national park plan and to inform its implementation. We

### Ramblers Scotland

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understand the reasons why previous work on the ORP was paused due to the Covid pandemic, but not the subsequent decision to discontinue the ORP entirely. We feel that without a focus on outdoor recreation and the ways the park can support people to experience the special qualities of the park, those who are enjoying outdoor activities are relegated in this plan to being visitors to be managed, or visitors who will support the local economy. These are clearly important elements of the park's work, but come from the perspective of the park authority rather than those who are actually taking part in recreational activities.

The population-wide benefits to health and wellbeing of ensuring people have opportunities to enjoy the outdoors are not emphasised. Yet, despite having almost no direct economic impact on the park, we would suggest that these benefits are one of the most important reasons for having national parks in Scotland and should be at the heart of any ORP. This is especially pertinent to Loch Lomond & The Trossachs NP given the proximity of Glasgow and its surrounding areas, with places where people are facing high levels of deprivation along with other barriers to participation. There has been an increase in visits to the outdoors by people living in Scotland since the Covid pandemic, which is to be welcomed and supported, but it is not clear that this increase has reached into these areas. The park's aims to be more inclusive won't happen without direct interventions and that can be planned for within an ORP.

We note the park plan includes an objective relating to increasing the diversity of those who are enjoying the park, and we believe an ORP would help to strategically plan for all the recreational needs of residents, day visitors or those staying overnight in the park. It would map the various activities taking place, potential areas for where they could be expanded and promoted – and also areas where people might be discouraged from going by not promoting them, due to the need for protection of sensitive sites. We're aware data on visitors' motivations and activities is gathered by the park authority but it's not clear how far this has informed the park plan. Data on what visitors do and what they would like to do (and in which seasons) should guide action. The management of access, including guidance on responsible access, should be recognised in the ORP for its fundamental role in ensuring that both the public and land managers are supported and access is strategically considered, along with helping to guide decisions on staffing and resourcing.

### **Vision for 2045**

The references to people who visit and enjoy the park within the vision is disappointing. These relate mostly to their modes of travel to and around the park and the economic impact of their visits. There is a reference to visitors feeling "connected with nature whilst enjoying great services and facilities



...”. However, there is no mention of outdoor recreational activities or any reflection of the wider public health benefits which enjoyment of the park can bring. These benefits often have no direct monetary value to businesses in the park, but at a population level are nevertheless extremely valuable, both for physical health and mental wellbeing. It is disappointing to see an aspiration for nature connection to be linked to economic activity rather than being seen as a benefit in itself.

People need to be inspired, encouraged and supported to visit the park for a wide range of reasons and not simply for economic ones. They also need to be engaged, informed and educated on both nature/wildlife/landscapes and their own responsibilities outdoors, whether through formal outdoor education activities or just as a part of their experience of being in the national park. The vital role of ranger services in this regard could also be referenced in the vision, given their fundamental role in engaging the public and caring for nature within the park.

#### **Restoring nature**

**Peatland, Trees, Water** – we support actions to restore peatlands and the objectives relating to trees, especially where natural regeneration can be supported without the use of deer fencing.

**Restore nature at a landscape scale** – we welcome the recognition that “It is only within the past few years that it has become more widely accepted that protection alone is not enough to halt the decline in nature” (p40). For nature to recover and thrive, action at a landscape scale is required and we therefore welcome objectives related to this.

**Reduce grazing animal pressure** – the key to much of this restoration will be the reduction of grazing pressures. Impacts from high numbers of herbivores has long been an issue within the park so it is to be hoped that this renewed effort and proposed step change in action will have a clear effect. However, while it is important to measure changes, it would be helpful to have a target set out in the plan for all measures to restore nature. For example, while there is a target for peatland restoration and woodland creation there is nothing for grazing impacts, beyond carrying out habitat impact assessments every two years. A target showing reduction in deer numbers over time, for example, would help to assess how ambitious this plan really is in this regard.

#### **Creating a sustainable, low-carbon destination**

##### **Connecting everyone with nature**

We fully support the aim to connect people with nature. Given that the main motivation to visit is to enjoy the scenery, there is a huge opportunity to inform and educate people while they are visiting



the park and often more receptive to such messages. This can include engagement on issues relating to the changes which are required in the way nature is restored and carbon emissions reduced, as set out within the plan. As mentioned above, an Outdoor Recreation Plan would be an important strategic document for such engagement.

**Inspiring action for nature and climate** – we welcome the objective on p68 relating to outreach and outdoor learning, though query why there is no reference to wider engagement and communication on both responsible access and nature/wildlife. The role of the ranger service in the day-to-day general engagement with visitors is key to influencing behaviour for the better and helping everyone to be aware of their responsibilities.

**Diversity and inclusion** – we fully support objectives related to expanding diversity and inclusion of those visiting and volunteering in the park. Given that the target audiences for this objective are less likely to own a car, it is imperative that pathways to and around the park by low cost public transport are created and promoted. Likewise, these audiences are not only interested in day trips but also longer stays and are most likely to need low-cost accommodation, such as campsites. The current provision of camping places in permit areas still doesn't reach the number of tents which were counted prior to the byelaws, suggesting there is a greater demand for campsites than is currently available. Also, many of the permit sites are generally only accessible by car and have no toilets or, where there are toilets, these close at 5pm. We would like to see the park working with public sector landowning bodies like Forestry & Land Scotland to develop more low-cost camping areas which are accessible to those without a vehicle and with basic facilities. Likewise, seasonal, or pop-up, camping areas in fields with basic facilities could help ease summer pressure but these have not yet been established, despite being common practice in some other national parks, including in England.

**Multi-year place programme / Visitor hubs** – we acknowledge that the challenge facing the park in terms of shifting the pattern of car-dependency for people getting to and travelling around the park is immense. While 50% of the Scottish population live within an hour's drive of the park, that number drops massively if they were to use public transport to arrive in Balloch, Tarbert/Arrochar or Callander, or trying to travel around the park. While we recognise that the park is not a transport provider, it is a concern that this issue has not been seriously tackled during the past 20 years.

**Recreational path network** – we support investment in the recreational path network. As a side note, given the increase in periods of heavy rainfall noted in the plan, the construction of shelters along more heavily used paths would be welcome. Simple shelters with benches would enable people to



sit out of the rain to have a break which can make a big difference when going for a walk on wet days. These could be set at a distance far enough away from roads to discourage vandalism. With the majority of walking activities taking place around settlements or at lower levels, it's right that core paths and long-distance routes are prioritised. However, there is very little funding available in Scotland for upland paths, especially for private landowners to apply for, so it's important that the park authority also takes account of the popular hill routes which can be heavily used. If not maintained, these paths can increase risks of erosion and environmental damage.

While there are many references to aspects of visitor management, there is little mention in the document of access management. Removal of obstructions, alongside liaison and support for land managers, and strategic oversight of the path network and other infrastructure is a key role for the park's access team. It is fundamental for ensuring that public access is not restricted, creating more barriers for the public to enjoy the park.

**Byelaws** – we note that the camping byelaws will be reviewed during the period of this plan. We wish to record our continuing objection to these byelaws which we believe have been costly and resource-intensive to manage. We do not dispute that there are pressures in some places and issues relating to some people's behaviour while camping, but we believe that improvements could have been achieved by diverting the budget spent on setting up and policing the byelaws into improvements to infrastructure, enforcement of existing legislation and more engagement by ranger services. It is telling that no other access authority has introduced byelaws to deal with similar issues to those faced by the park, and as a result there is little learning that can be disseminated to others from this investment. We would like to see these byelaws allowed to lapse.

### **Greener economy and sustainable living**

**Rural transport and active travel** – we fully support objectives to improve options for active travel around the park, as this will be beneficial both for residents and for those visiting the park. As well as links between and around communities within the park, this objective should include working with neighbouring local authorities to provide and promote safe offroad routes into the park, for example to hubs like Callander from the railway line through Stirling to Dunblane. This would enable people to reach the park by bike as well as improving the path network on the fringes of the park which may take some pressure off the popular places within the park.

We fully support objectives related to supporting a modal shift but suggest that the approach is both carrot and stick, ie, making driving into the park more inconvenient while ensuring there are regular,



reasonably priced public transport alternatives. This could include park and ride facilities and shuttle buses along east Loch Lomond or on the outskirts of Luss as well as working with public transport providers to promote bus and train routes. Improved water bus options should also be included. Reducing overall traffic levels would make the option of cycling and walking within the park safer and far more attractive. The forthcoming upgrade to the A82 and works on the A83, likely to take place during the period covered by this plan, provide a good opportunity to shift behaviour patterns, given that congestion is likely to be a feature of these works.

**Local Place Plans** – while there are references on p111 to key issues for Local Places Plans, there is no mention of the importance of the need to focus on public access. This includes taking account of land on which access rights apply as well as the paths and routes we rely on to facilitate our access rights. This is set out in NPF4 Policy 20 Blue and Green Infrastructure. Rough grassland, farmland, green spaces and woodlands in and around the edges of our settlements are all important places to enjoy recreation and improve the wellbeing of the community. These places are often under threat from development. If there are no formal routes like core paths or rights of way through these areas, there is a danger that informal (but much valued) local access is overlooked. If this is mapped in Local Place Plans it's less likely that new development will take place without accommodating existing access patterns. Therefore we suggest adding public access to the list of priority areas.

We trust these comments are helpful but would be pleased to discuss them further.

Yours faithfully

Helen Todd  
Campaigns & Policy Manager