

CONSULTATION

Response Document



Consultation on the Loch Lomond and The Trossachs Draft National Park Partnership Plan

19/07/2023

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 7,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 740 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by Members of our [Scotland Policy Group](#).

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy) at JasonReeves@cieem.net with any queries.

Overarching Comments

This is an ambitious plan recognising the scale and urgency of change that is required. National Parks need to be the foci for nature restoration at a faster and larger scale than what may be possible elsewhere. There are clearly defined aims and objectives and SMART targets throughout which we are very pleased to see as well as clear recognition of the key drivers of biodiversity loss. As the document is long it would be helpful to have the SMART targets compiled in a table so that the actions and deliverables can be clearly viewed. Parallel to this it would be good to see an implementation plan with clear deliverables that is signed up to by the various agencies and stakeholders.

» Which of the objectives and actions outlined in this Draft Plan can you or your organisation help to deliver?

CIEEM is a professional body representing ecologists and environmental managers. Many of our members will work in the various organisations that work within the Loch Lomond and Trossachs National Park. Therefore, although as an organisation we can't directly help to deliver the actions outlined we can play an important role in disseminating information via the Scottish newsletter, sector news, social media channels and by hosting member network events within the LLTNP to share best practice and experience.

» What role can you play in delivering these?

As above

» Are there any challenges or barriers we need to overcome to help you do this?

N/A

» Can you suggest any other objectives or actions to help us meet our aims in each area of this Draft Plan?

See detailed comments in the comments on policies section.

» Can you suggest any other delivery partners needed to help deliver these?

Neighbouring landowners and stakeholders that operate in the LLTNP need to be involved in the delivery. This is particularly the case with control of Invasive Non-Native Species (INNS). For example, control of riparian invasive plants has to be conducted across the whole catchment with upper reaches of the catchment focussed on initially. If there is one landowner who is not engaged and thereby the INNS are not eradicated for that area re-invasion will occur downstream, eradication is not achievable, and control will need to continue in perpetuity with associated economic costs. INNS issues are by nature cross-border and will require co-ordinated action across the boundaries of the LLTNP.

» **Do you have any comments on the policies outlined in each area of this Draft Plan?**

Timescales

There is a mix of timescales used in different sections. For example:

On pg 42 - *AIM BY 2045. The ongoing decline in nature in Loch Lomond & The Trossachs National Park will be reversed by 2030 and there will be widespread restoration and recovery of nature by 2040. A landscape scale Nature Network approach will be taken, improving and connecting core areas and expanding the links between these core areas across the National Park.*

So is it 2040 or 2045?

Likewise:

AIM BY 2045 Our ecosystems are in good health and helping us to adapt to and mitigate against the climate crisis, supporting the National Park to be an overall net carbon sink for Scotland.

Yet elsewhere, it states that LLTNP will become a *Net Zero National Park by 2040* and online 2030 is stated as the goal.

We applaud the ambition of the plan and the fact that LLTNP is leading the way to *become a Net Zero National Park*. The recognition that the pace and scale of peatland restoration and new woodland creation will need to step up considerably and the need to secure both public funding and private investment to achieve this is very welcome.

Therefore, there just needs more clarity on the target timescales. Would it make more sense to align with the Scotland wide plans to reach net zero by 2045, with interim targets of 75% by 2030 and 90% by 2040. Likewise, the Scottish Biodiversity Strategy timescales of 2030 and 2045. The ambitious strategic landscape scale aims, and objectives outlined in the draft plan will hopefully mean that the targets will be reached early.

Invasive Non-Native Species (INNS)

We are pleased to see INNS highlighted. The IBPES identifies Invasive Non-Native Species (INNS) as one of the five direct drivers of global biodiversity loss¹. It is also one of the top drivers of loss in Scotland². The condition of protected areas – our most important spaces for nature – has not significantly improved over the past 15 years, and invasive species are the single biggest pressure affecting these sites^{3,4}. Our native

¹ IBPES Global Assessment (2019), <https://ipbes.net/global-assessment>

² State of Nature report (2019), <https://www.scotlink.org/publication/state-of-nature/>

³ Scottish Environment LINK, *Protecting 30% of Scotland's land and sea for nature* (2022) <https://www.scotlink.org/wp-content/uploads/2022/11/30-by-30-Report-WEB.pdf>

⁴ NatureScot, *Invasive species the biggest pressure on nature sites* (2019) <https://www.nature.scot/invasive-species-biggest-pressure-nature-sites>

woodlands, including our globally significant temperate rainforest, are under immense pressure from the spread of *Rhododendron ponticum*⁵ and this is a particular issue within LLTNP.

Access

The National Access Forum should be added to the list on page 50. The National Access Forum has recently been working on actions to reduce disturbance to wildlife from access takers. There is no mention of the Scottish Outdoor Access Code in the plan. Nor are there any mentions of disturbance by dogs; this is particularly relevant for ground-nesting birds.

Climate Change Impacts

Wildfires are mentioned as a risk on pages 19 and 100 but no actions are proposed to help protect the park from this risk, unlike flooding. Increasing risk of wildfires with climate change and ongoing visitor pressure leading to an increasing number of accidental fires requires that a clear vision and actions are needed. The effects of climate change will need to be effectively monitored to ensure adaptive management occurs to assist the positive trajectory to nature recovery and restoration.

Planning

To ensure a long-term and just transition to a net zero, nature-positive economy there needs to be clear policies and implementation measures to ensure that environmental considerations are given true weighting over and above traditional economic considerations including planning. The most salient point of the Dasgupta review⁶ is that “Our economies, livelihoods and well-being all depend on our most precious asset: Nature. Truly sustainable economic growth and development means recognising that our long-term prosperity relies on rebalancing our demand of nature’s goods and services with its capacity to supply them. It also means accounting fully for the impact of our interactions with Nature across all levels of society.” The findings of the Dasgupta review can help inform policy direction in the National Parks where tensions arise in planning between economic opportunities/ drive for productivity with climate and biodiversity objectives.

Pg 108 - Ensure new development delivers positive outcomes for nature through securing biodiversity net gains on site and investing in local nature networks identified as part of the development of the new Local Development Plan.

⁵ Native Woodland Survey of Scotland (2014) <https://forestry.gov.scot/forests-environment/biodiversity/native-woodlands/native-woodland-survey-of-scotland-nwss>;

⁶ Dasgupta, P. (2021), The Economics of Biodiversity: The Dasgupta Review. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The Economics of Biodiversity The Dasgupta Review Full Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The_Economics_of_Biodiversity_The_Dasgupta_Review_Full_Report.pdf)

In terms of securing net gains will LLTNP as a planning authority be looking for the use of metrics in planning applications to determine measurable impacts? Or where metrics are used in a planning application, welcome them? The Scottish Government has adopted the use of 'positive effects for biodiversity', how will this be measured to ensure that positive effects for biodiversity are delivered and evidenced?

Links should be made under Sustainable Living section to 20 minute neighbourhoods and local living⁷ that is currently being consulted on by the Scottish Government.

At a CIEEM event which brought together representatives from more than 70% of LPAs throughout Scotland to discuss NPF4 and the Developing with Nature Guidance⁸ and in a subsequent survey on ecological capacity and expertise within Local Planning Authorities key concerns were raised⁹. These centred on lack of ecological capacity and expertise and lack of enforcement staff to ensure compliance. Two-thirds of respondents rated lack of enforcement as a high or very high risk to their LPA's ability to implement NPF4 and Positive Effects for Biodiversity. Without in-house ecological expertise in local authorities, positive effects for biodiversity cannot be measured in a consistent way. Likewise, there should be well resourced qualified Planning Enforcement Officers to ensure tree protection and biodiversity enhancement measures are realised. The expertise and expectations of planning and ecological staff needs to be clear so that individuals are not having to make professional judgements outside their area of expertise and competence. Ecological capacity should be reviewed within LLTNP and training needs assessed and addressed as necessary.

Regional Land Use Partnerships

We would welcome the creation of a Regional Land Use Partnership (RLUP) and we note that this is proposed.

Facilitate a Regional Land Use Partnership and prepare a Park-wide Land Use Framework setting out collaborative land use change objectives and priorities across multiple land holdings at a landscape scale.

We strongly suggest that this also includes land managers of neighbouring estates outwith the park. Nature recovery actions should be holistic and be embedded across the landscape and linking with nature networks

⁷ <https://www.gov.scot/publications/local-living-20-minute-neighbourhoods-planning-guidance/documents/>

⁸ CIEEM (2022). Summary report from the Scottish Local Planning Authority event held January 2022 to discuss NPF4 and the Developing with Nature Guidance. <https://cieem.net/resource/a-summary-report-from-scottish-lpa-event-to-discuss-the-emerging-npf4-and-developing-with-nature-guidance/>

⁹ <https://cieem.net/survey-of-scottish-local-planning-authority-capacity-highlights-risk-to-delivery-of-npf4/>

outwith the park boundary. There will be important lessons learned from the existing trial of RLUPs that should be considered.

There is also mention of a Nature Restoration Land Forum. How would this relate to a Regional Land Use Partnership and Framework?

On pg 43 it states - *Create a Nature Restoration Land Forum that coordinates and supports this approach across the National Park and contributes to the implementation of Scotland's 30x30 commitment.*

Maps

It is really helpful to see the maps for woodland, peatland and water quality. With the peatland cover map, it displays broken peatland, would this map be updated to incorporate strategic priority restoration areas?

For the map displaying existing native woodland cover, productive conifer and native woodland creation opportunities does native woodland creation opportunities encompass native tree regeneration or just planting and if both can this be highlighted and assigned.

Reference should be made to the extent of productive conifer and whether any of this will be felled to create future native woodland opportunities. Also, consideration needs to be given to Sitka spruce regeneration and impacts on neighbouring land and potential native woodland creation areas. The BSBI Plant Atlas 2020 found that Sitka spruce had the greatest increase in range of any species covered by the project, with researchers warning of the need to carefully control and manage its spread¹⁰. A programme of action to remove and prevent further incursion of non-native conifers onto peatlands and other important open country habitats is required. This is a rapidly intensifying problem and will consume future conservation budgets without urgent action.

Green Jobs, Skills and Business Opportunities.

Recognition is rightly given to the importance of developing and delivering training and further education opportunities that meet the anticipated demand from scaling up climate and nature restoration projects as well as regenerative agriculture and sustainable forestry.

Our Green Jobs for Nature website¹¹ is packed full of information about what a green job is and how to get one to inspire the next generation of ecologists and environmental managers. There are also over 100 profiles¹² from people working in ecology and environmental management roles describing their jobs, how

¹⁰ <https://plantatlas2020.org/>

¹¹ <https://greenjobsfornature.org/>

¹² <https://greenjobsfornature.org/?s=profiles>

they got into the profession and sharing their career tips. If we can support the work of LLTNP in this area, please get in touch.

Likewise, if we can help with our extensive programme¹³ of member network events, in-person and online training, webinars and conferences please let us know.

What Could it Be? sections

Although we appreciate what the intention is with the 'What could it be' sections, the language in the sections does not always reflect the ambition elsewhere in the document which might lead to confusion and devaluing the ambition elsewhere in the plan. As an example, in the 'What could it be?' section on pg 41 - *Invasive NonNative Species could be reduced to no longer threaten our native ecosystems and more naturalised water courses could become slower and cleaner flowing.*

The language here should be strengthened. INNS as a key driver of biodiversity loss 'should' rather than 'could' be reduced.

» Do you have any comments on the measures of success proposed? How can you help us to measure them?

We are pleased to see that in each section of the Draft Plan there are proposals for how might measure success against the draft objectives being put forward. This is critical as only by establishing a robust programme of monitoring will we know if the strategies are a success and if not, how they can be adapted to make them so. Need to ensure that ecological expertise is woven into the decision-making process. It would be good to include these measures of success in a table so targets can be clearly seen.

Water quality

Will the ecological status of target waterbodies at key restoration sites (and a 'control group' of waterbodies for comparison) be monitored in the context of the Water Framework Directive via River Basin Management Plans or by other mechanisms and if so, how will these relate to the Water Framework Directive?

Invasive Non-native Species

Track the extent and distribution of target Invasive Non-native Species. See a demonstrable, ongoing decline that is consistent with halting the decline of nature by 2030.

This is quite generic and hard to know how you will evidence a demonstrable ongoing decline. Will distribution and abundance be assessed? What are the target species that will be monitored? Overall, there

¹³ <https://events.cieem.net/Events/Event-Listing.aspx>

may be increases in some invasive species and declines in others. A more targeted approach of assessing impacts is to look at occupancy and abundance of a number of key invasives that are known to threaten habitats of conservation concern within the LLTNP. For example, *Rhododendron ponticum* spread in Atlantic rainforests. The eradication or long-term control of well and widely established INNS must be undertaken using planned and strategic operations, with clear and specific environmental/ecological outcomes based on monitoring. Action must adopt and build on best practice.

State of Nature monitoring and reporting system for LLTNP

We note with interest that you are thinking of a State of Nature monitoring and reporting system for the NP. *A State of Nature: Baseline assessment is proposed to be completed in 2023, and measured every 5 years thereafter.*

It makes sense to conduct a baseline assessment in 2023 to coincide with the State of Nature report at the end of September 2023. However, this is a significant amount of work, so we question whether resources are in place to conduct it in the timescale and work alongside/learn from those involved in the State of Nature report. We also note that the outcomes from this consultation will be reviewed and adopted by the board in 2024 so not sure how these timescales align.

Demonstration Sites

We would like to see evidenced outcome-based examples within the LLTNP. These could be used as demonstration sites to inspire and share good practice. These should be at a range of scales including a larger landscape scale project.