

What is the Loch Lomond and Trossachs National Park Authority doing to tackle climate change?

## Description

**National parks have key role in net zero journey**  
GORDON WATSON

**W**ITH Scotland's Climate Week under way, and COP27 fast approaching, the need for urgent action on climate change is rightly back at the top of the news agenda.

As one of the first nations to declare a global climate emergency in April 2019 Scotland set an ambitious target to become net zero by 2045.

The critical role for national parks in that journey to Net Zero and to reverse the decline in nature was laid out in a joint statement with other protected landscape organisations around the world during COP26.

This initiative, led by our Convener James Stuart, helped secure a strong international commitment from many of the protected landscapes that make up 30 per cent of the world's land mass, to make tackling climate change and biodiversity loss their top priority. It also brought attention to the critical role many of our landscapes can play to become net absorbers of carbon while restoring nature.

Here in Scotland's first national park, this is embedded in everything we do. We have committed to reach net zero as an organisation by 2030 and see this as an important step towards setting ambitions for the whole National Park to become net zero as a place.

The fact is, the impacts of climate change are being seen and felt by those who live, work and visit here – increased flooding and road closures due to landslides being the most obvious examples.

However, the national park is also an ideal carbon capture landscape and the perfect place to take forward the innovation and scale of investment required to make a real difference in tackling climate change and reversing biodiversity loss.

Nature-based solutions such as peatland restoration and woodland expansion are important ways in which national parks are playing their part.

Around 36% (68,000ha) of land here is covered by peatland but much of it is degraded, emitting carbon and other greenhouse gases into the atmosphere.

So there's a big job to be done in restoring peatlands so they soak up carbon and deliver other benefits such as storing water and creating healthier habitats for nature. Additional resources made available for peatland restoration in recent years mean we have been able to ramp up this activity.

Woodland expansion is also key – giving us more trees and more woodland soils – both of which trap and store carbon. We are working with land managers and partners such as Scottish Forestry colleagues to make this happen.

Many of the changes and solutions we are driving forward can also mitigate impacts on communities and businesses.

Restored peatland soaks up rainfall, slowing down water run-off that causes flooding. Investing in sustainable transport and active travel benefits people living, working and visiting here and through our planning processes we can promote more sustainable, energy efficient development.

The challenge is significant but with investment and collaboration, we can restore and improve the natural resources we have in our national parks and across rural Scotland – for climate, for nature and for communities impacted by climate change both here and across the world.

■ Gordon Watson is Chief Executive of Loch Lomond & The Trossachs National Park Authority

Agenda column, the Herald, 29th September

Gordon Watson, the Chief Executive of the Loch Lomond and Trossachs National Park Authority (LLTNPA), made a number of claims in the Herald on Wednesday about what they were doing to

tackle climate change and the “decline” in nature (“collapse is the more appropriate word) following the rather belated commitments they made at the COP summit in Glasgow last year. None of them, unfortunately, stand up to scrutiny.

## Claim 1 – the commitment to reach net zero as an organisation by 2030

Here is the progress made last year, as reported to the LLTNPA Board Meeting in June ([see here](#))

AOP Activity	AOP Deliverable	Year End Commentary	Rating
<b>1: Taking and inspiring action to address the global climate emergency</b>			
1.1 Start to implement our Mission Zero Route Map to be a net zero organisation by 2030	Develop a detailed implementation plan for the next two to three years of investment and change within the National Park Authority	The draft implementation plan has been adjusted alongside the developments of the 22/23 budget. Further scoping work has been completed in terms of staff resourcing and timelines.	Complete
	Deliver infrastructure upgrades across our estate including heat pump installations, new electric vehicle charging points, and lighting upgrades	Procurement of works we hoped could be carried out before the year end was unsuccessful due to insufficient tender returns. We have re-evaluated the procurement approach and will be able to re-issue tenders in the new financial year.	Postponed to 2022/23
	Review our fleet requirements and create a new management strategy for our road vehicles to identify how we will electrify our fleet and curtail petrol/diesel along the way	The Fleet Decarbonisation Report was received at the beginning of April. The contents of this report will be considered and feed into the development of NPA Fleet Strategy.	Partially achieved
	Engage our staff, Board, and volunteers to support and encourage positive behaviour changes to reduce emissions, including through a review of our organisational policies	All new seasonal rangers have received Mission Zero induction. Second cohort Carbon Literacy training delivered with 25 staff members receiving training total.	Complete

Annual Operational Plan (AOP) Progress to Year End 2021/22

The one “deliverable” that might actually reduce carbon emissions, infrastructure upgrades, postponed to 2022/23.

The LLTNPA is a medium sized organisation, employing just under 150 Full Time Equivalent staff, which contributes a relatively small proportion of the carbon emitted in the National Park. It has, however, decided to focus almost entirely on how to reduce its own carbon emissions rather than looking at the carbon being emitted in the National Park as a whole.

Mr Watson claims in the article this is “an important step towards setting ambitions for the whole of the National Park to become a net zero as a place”. The sentence is nonsensical, you cannot set ambitions only targets. The important point, however, is work on reducing carbon emissions across the National Park needs to start now, not wait until the LLTNPA has put its own house in order.

## Claim 2 – ramping up peatland restoration

The LLTNPA set itself a target in its National Park Partnership Plan (NPPP) 2018-23 to restore 2000 hectares of damaged peatland by 2023. This is a very modest target given that Mr Watson states that much of the 68,000 ha of peatland in the National Park, a third of the total area, is degraded.

Unfortunately, the LLTNPA no longer reports annually on progress against its NPPP, instead it reports on targets it sets out each year in its Annual Operation Plan. This makes it very difficult for the public or indeed Government Ministers to see how it is “performing” over a period of time. However, there was a three year review of progress on the NPPP in 2021 ([see here](#)) which reported 416ha of peatland



had been restored. Add to that the information in this year's annual report, "Working with landowners, we undertook 359 hectares of peatland restoration across the National Park at a cost of £139,427" and that comes to 775 ha of peat restored. The target for peatland restoration in this year's annual operation plan is "Deliver up to six new peatland restoration projects covering over 520 hectares".

This means that at best the LLTNPA will have restored 1,295 ha of peatland out of its target of 2,000 ha by 2023. Far from ramping up peatland restoration activity as Mr Watson claims to have done in the Herald article, the LLTNPA has completely failed to meet its targets. If 30,000 ha or less than half of the peatland in the National Park is damaged, at this rate it will take 100 years to stop damaged peat bogs emitting carbon into the atmosphere.

### **Claim 3 – the LLTNPA is working with land managers to make woodland expansion happen**

#### **Loch Lomond & The Trossachs National Park Partnership Plan 2018-2023**

The National Park Partnership Plan has 14 indicators and associated targets which are reported annually. The following indicators are particularly relevant to the Trees and Woodland Strategy:

**1. Area of new woodland**

2,000 hectares of woodland expansion by 2023

**2. Percentage of designated sites in favourable condition**

Increase from 2017 baseline of 76% of designated site features to 80% by 2023

The LLTNPA's Trees and Woodland Strategy committed to "Increasing woodland cover to help tackle biodiversity loss and the global climate emergency".

In 2021 the LLTNPA reported that in the first three years of the NPPP "585.42ha of woodland have been created of a target of 2,000". While the last two Annual Operational Plans refer to the implementation of "ambitious landscape-scale restoration projects", which include woodland expansion, they contains no targets for this or reports on progress. Neither does the LLTNPA's annual report for last year. There is therefore no way for the public to tell therefore whether the LLTNPA has any chance of closing the gap between the 585.42 ha of woodland expansion it has reported to date and its 2000ha target by March next year.

In the absence of concrete information, Mr Watson's claims that the LLTNPA is working with land managers to make woodland expansion happen should be taken with a large dose of salt. Treading water would appear to be a more accurate description of what is happening.

### **The climate emergency, the LLTNPA, transport and planning**

While the National Park's powers and resources are limited, its statutory remit is very wide and includes duties to promote sustainable development and ensure natural resources are used wisely. Gordon Watson acknowledges this at the end of his piece when he refers to "investing in sustainable transport" and the National Park Authority using its planning powers to promote "sustainable, energy efficient development".

After years of doing nothing itself to develop more sustainable forms of transport in the National Park, in December 2021 the LLTNPA Board was told that staff were going to pilot a shuttle bus between Callander and Aberfoyle to address the traffic and parking congestion around Ben A'an and other visitor hotspots along the route. Why a pilot was needed when there used to be a Trossachs Trundler service was not clear, however this appeared good news and a positive step forward. Just nine months later, however, staff reported this to the LLTNPA Board:

“We have made the decision to cancel our planned work in relation to the Shuttle Bus Pilot; we explored all options for delivery but were faced with challenges not within our gift to overcome” ([see here](#))

Why is it that the LLTNPA cannot manage to set up even one shuttle bus service when in the Alpine countries such services are common? As a start why not just redeploy all the buses that are used to transport children to school in the holidays as happens in Italy and France? And if the private operators won't co-operate, call on the local authorities to take the bus services back in-house so this can happen?

While Mr Watson's reference to sustainable energy efficient development was most welcome, he was silent about the LLTNPA's past support for developments that have or will increase carbon emissions. These include the proposals to develop the Riverside Site at Balloch (the LLTNPA were on the interview panel that selected Flamingo Land as preferred developer).

The Committee Report that was prepared on Flamingo Land's application for planning permission in principle in 2019, before it was withdrawn, claimed that all the emissions associated with the construction and operation of the proposed development, including the destruction of woodland, could in theory be mitigated. Officers stated, however, carbon emissions could only be considered when full planning applications were submitted for each element of the proposed development. Had the application for Planning Permission in Principle been approved, that would have left the LLTNPA with no way of assessing the overall carbon impact of the development, for example all the extra traffic or how micro renewables on one part of the site might contribute to the whole.

If Mr Watson is serious about the LLTNPA using its planning powers to reduce carbon emissions, that needs to be assessed up front and at the planning permission in principle stage. So far there is no sign of that happening with the latest Flamingo Land Planning application.

## **What needs to happen**

While Gordon Watson's claims in the Herald article were totally misleading and not backed up by the evidence of what the LLTNPA has achieved to date, where I agree with him is that National Parks should be taking a lead in respect to climate change.

I also have a great deal of sympathy for frontline staff who are being asked to work in very difficult if not impossible circumstances. In claiming all is rosy in the National Park, Mr Watson was concealing the problems that prevent staff from making much meaningful progress towards net zero. For example, in respect of the state of peatland and woodland in the National Park, the real issue that needs to be

tackled are the levels of overgrazing by sheep and deer which continues to damage peatland and is preventing woodland from regenerating naturally.

This was recognised in the Trees and Woodland Strategy which identified “Unsustainable levels of grazing” as a key issue and committed to producing by 2023:

“Park-wide habitat impact assessments occurring in upland and woodland habitats. Number of native woodlands in the ‘high’ and ‘very high’ herbivore impact categories reduced or management in place to ensure there will be a reduction in impacts.”

Mr Watson was totally silent about what is being done about that – a missed opportunity – but saying so would have meant criticising landowners, the way they are managing the land and the way this is supported by the rural payments system. Until the LLTNPA tackles these fundamental issues it will continue to miss its landscape restoration targets or be forced to reduce them to ever more modest levels.

What the LLTNPA needs is an outbreak of transparency: transparent reporting on what it has actually achieved and transparent explanations of the challenges it faces. Its Board could then make recommendations to the Minister with responsibility for National Parks, the Green MSP Lorna Slater, about what needs to change if it is to take a lead in tackling climate change. Instead the LLTNPA emits a constant stream of parkspeak, vacuous soundbites which serve to conceal the fact that it is performing far below its potential.

### **Category**

1. Uncategorized

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