

Report 2

The Report on the Proposal for The Loch Lomond and The Trossachs National Park

An account of the consultation programme and analysis of responses

Scottish Natural Heritage

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Introduction

1. Under Section 3 of the National Parks (Scotland) Act 2000, Scottish Natural Heritage (SNH) was asked by the Scottish Executive to act as Reporter in consideration of the Government's Proposal for Scotland's first National Park in Loch Lomond and The Trossachs. SNH was asked to consult and report on:
 - the area which was proposed for possible designation as a National Park;
 - the desirability of designating the area in question (with or without modification) as a National Park;
 - the functions and powers proposed for the National Park Authority;
 - the likely annual costs and capital expenses of the authority in exercising its functions;
 - the experience and expertise which should be held by members of the National Park Authority.
2. The Reporter was required to consult on the Proposal over at least a 12-week period, and to take all reasonable steps to ensure that those likely to have a legitimate interest in it (and especially those living, working, or carrying on business within the proposed area) were aware that the consultation was taking place. The consultation was also required to be participatory, and SNH was asked to ensure that people had an opportunity to discuss issues and to suggest and consider alternatives.
3. In carrying out its role as the Reporter in accordance with the requirements outlined in the Government's Proposal for a Loch Lomond and The Trossachs National Park, SNH was also asked to:
 - ensure that agencies and public bodies were consulted and their views reported;
 - build on preparatory work undertaken in 2000;
 - develop and report on objective criteria and an associated methodology against which SNH make their assessments of the Proposal;
 - record and report on the views expressed by consultees; and
 - make quite clear and distinct any views which are those of SNH as statutory advisor on natural heritage matters.

Context of the Consultation Process

4. National Parks have been the subject of considerable debate in Scotland during the past 50 years. In 1997, the Government first stated its intention that National Park designation would be the best way forward in meeting the needs of a few extensive areas of high natural heritage value and which were in need of an integrated approach to their management. Against this background, SNH was asked to advise on the powers and structures needed for a National Park designation and the subsequent consultation resulted in the report *National Parks for Scotland: SNH's Advice to Government* in February 1999. Scottish Ministers accepted this advice as the basis for legislation, and the National Parks (Scotland) Act was passed by the Scottish Parliament in August 2000. It also confirmed its intention to establish National Parks in Loch Lomond and the Trossachs and the Cairngorms.
5. In early 2000, SNH was asked to undertake further preparatory work to help develop elements of the proposal for a Loch Lomond and The Trossachs National Park. With the aid of the Loch Lomond and Trossachs Interim Committee (LL&TIC), an important part of this work was further dialogue with communities and other interests in the area. Table 1 summarises the key elements of the work undertaken between the Government's original announcement in 1997 and the passing of the National Parks (Scotland) Act in August 2000.
6. It was evident from the above that much time and effort had already been spent consulting on the subject of a National Park in the Loch Lomond and Trossachs area. SNH therefore recognised that the Reporter's consultation on the Government's Proposal needed both to build upon this work, and to recognise that there was already a degree of consultation fatigue within communities and organisations. At the same time, there was also a need to broaden the approach to consultation to ensure that all the main interested parties had the opportunity to formally contribute. To assist with the design and delivery of the consultation process, SNH commissioned two consultants with experience in facilitation to assist with the design and delivery of the consultation process. The consultants were charged as follows:
 - To identify, and agree with SNH, a list of all relevant target audiences for the consultation programme. It was envisaged that this would cover geographical communities, local and national interests, as well as the range of social or interest groups. Young people were specifically identified as one audience which SNH wished to include in the consultation programme.
 - To devise and implement a programme of consultation which ensured that:
 - ✓ SNH's proposals were communicated effectively to these audiences, i.e. **informing**;
 - ✓ people had the opportunity to fully consider and respond to the proposals, i.e. **engaging**;
 - ✓ the results of the consultation process were effectively communicated back to those who participated, i.e. **reporting**.
 - To deliver the following objectives:
 - ✓ a consultation programme that engaged young people
 - ✓ a report to SNH on the outcomes of those elements of the consultation process facilitated by themselves – recording and reporting on the views of those expressed by consultees;
 - ✓ an evaluation of the consultation methodology, including suggestions on how this might be refined in future consultation work within the area.

Management

7. A Steering Group was convened to design, implement and oversee the consultation programme. It comprised SNH staff from the Argyll & Stirling Area and the Advisory Services Awareness & Involvement Unit, the Planning Manager of the Interim Committee and the two consultants. Regular liaison and communication was also maintained with the Association of Community Councils for the area.
8. SNH used its existing operational structure and resources to deliver the overall consultation programme. However, to provide a strong focus for the work and a clear channel for reporting back as Reporter, a 'Loch Lomond & Trossachs Reporter Team' was established comprising of a number of staff from the Argyll & Stirling Area and National Strategy Unit. Throughout the consultation period, these staff were available through a telephone helpline, by mail and email and by contact at meetings and surgeries.

Target audiences

9. In light of the Requirement to ensure that all those with a legitimate interest in the proposal (and especially those living, working, or carrying on business within the proposed area) were made aware of the consultation, the target audiences to be informed and engaged were extensive. These included:
 - people who live in the proposed park area as well as those who live on the periphery;
 - people who visit and enjoy the area;
 - the full spectrum of age groups from school children through to the retired;
 - people with specific interests in the park area and those who represent them at the local level;
 - local and national interest groups; and
 - local and national governmental bodies and agencies.
10. The Steering Group recognised that involving such a wide range of interests effectively would require a varied approach to the consultation, and that no single communication medium could be used to achieve all its aims.

Components of the Consultation Programme

11. The mix of communication methods used to meet the requirements of the consultation process and its objective to engage the full range of target audiences set out in paragraph 8 were as follows:

Informing

- ✓ main consultation document;
- ✓ press adverts and releases;
- ✓ summary leaflet (including a version in Gaelic);
- ✓ large-scale maps;
- ✓ question and answer material about National Parks;
- ✓ static display material used at events, surgeries and national displays;
- ✓ website;
- ✓ a help desk to answer specific queries; and
- ✓ a residential event involving young people from the area.

Engaging

- ✓ the main consultation document contained a series of 20 key issues for potential respondents to consider and respond to;
- ✓ a summary leaflet containing a Comment Form for recipients to consider, complete and return;
- ✓ drop-in surgeries at 11 locations in the area;
- ✓ meetings with interest groups and individuals, including a workshop bringing together the members of the Interim Committee's five Reporting Groups;
- ✓ public meetings at 12 locations in the area – facilitated and recorded by consultants;
- ✓ displays at public venues in Stirling, Perth, Glasgow and Edinburgh
- ✓ the help desk;
- ✓ email contact of ll&t.reporter@snh.gov.uk for general enquiries;
- ✓ on-street surveys;
- ✓ secondary school questionnaire;
- ✓ youth focus group discussions;
- ✓ discussion with representatives of the Scottish Youth Parliament; and
- ✓ visits and presentations to primary schools in the area.

Reporting

The main outputs from this consultation are as follows:

- ✓ Report 1: Conclusions of the Reporter and SNH's advice on the key issues for consultation;
- ✓ press release advising on the formal publication of Report 1.
- ✓ Report 2: Description of the consultation process and stakeholder analysis (this report);
- ✓ Report 3: Findings from the consultation programmes public events;
- ✓ Report 4: Evaluation of the consultation exercise;
- ✓ feedback newsletter on key points raised at the public events and an outline of the next steps;
- ✓ presentations by SNH staff to interested groups; and
- ✓ the continued operation of the help desk for general enquiries.

12. Further details of these approaches are provided in Annex A. In addition, the relationship between them and the range of identified audiences is highlighted in Report 4, which contains the consultant's evaluation of the consultation programme.

Stakeholder analysis and key findings

Responses to main consultation document

13. SNH received over 300 written responses to the main consultation document, the majority of which arrived before or immediately after the closing date of the 9th February. These responses reflected an extremely wide range of views. Most respondents did not try to address all the questions methodically, but made specific comments about the themes which concerned them most. In particular, most responses addressed the question of the proposed area of the Park, with a small number of respondents also providing maps of their own ideas on the boundary. In addition, a substantial number of respondents also gave views on representation on the Park Board and on the powers of the Park Authority. A small number of the responses received were simple acknowledgements from organisations outwith the area.
14. A full listing of all respondents to the main consultation document is presented in Annex B. For the purpose of this analysis, each response was numbered as it came in, and given a prefix according to whether SNH believed that the response lay within one of the following categories:

Individuals/individual households	A
Individual landowners/managers/factors	B
Individual companies and businesses	C
Community councils	D
Local Authorities	E
MSPs/MPs/LA Councillors	F
National agencies	G
Regional/local public bodies	H
Land management interest groups	J
Natural and cultural heritage interest groups	K
Recreation/sport interest groups	L
Social and economic interest groups	M
Professional bodies	N
Research/academic organisations and individuals	O
Other respondees	P

Similarly, each response was coded by area of origin as follows

Within proposed Park area	
Core	W1
Argyll Forest Park	W2
West Glen Dochart	W3

Loch Earn/Ben Vorlich	W4
Port of Menteith	W5
Unknown	W6
Adjacent Areas	
Strath Blane and Strath Endrick	X1
Flanders Moss	X2
East Glen Dochart	X3
Glen Lochay	X4
SW Loch Tay	X5
Glen Fruin	X6
Unknown	X7
Others	
From within the four local authority areas covering the proposed Park area	Y1
From outwith these four local authority areas but from within Scotland	Y2
From outwith Scotland	Y3

15. A breakdown of respondees against this coding is presented in Table 2. While we recognise that the coding process we have undertaken may not be entirely accurate (for example not all respondents indicated an affiliation while other responses did not fit easily into any one category), we believe that it has allowed for a more detailed assessment of support for or opposition against particular aspects of the proposal.
16. The detailed analysis of these responses is set out in Annex C. Inevitably this analysis is a distillation from a wide range of comments, many of which showed a strong degree of passion, commitment and, in places, opposition to aspects of the proposal. The sequence of the responses set out in the tables in this Annex follows the structure of the questions listed in Section 4 of the consultation document. In addition, a number of tables deal with other comments generated during the consultation – on costs, on aspects of the National Park and its management, on the direct elections to the Park Board, and on the consultation process itself. The first column of each table provides a statement of the main sub-themes that emerged on any particular issue. This is followed by a listing of the code of respondents who made this comment, sorted by their origin. The final column provides some sample quotations from the responses to illuminate the points being made. Inevitably, this presentation cannot be expected to be totally comprehensive, since different respondents gave different degrees of emphasis to different points. However, it does aim to provide a fair indication of the relative number, type of respondents and location of respondents who commented on each of these sub issues.

Responses to summary leaflet

17. SNH received over 200 responses to the summary leaflet, the majority using the 'Comment Form' provided to assist with making a response. As with the responses to the main consultation document, each response to the leaflet was coded as it came in according to the type and origin of the respoondee. A breakdown of respondees against this coding is also presented in Table 2.

18. The detailed analysis of the responses to the summary leaflet is set out in Annex D. This analysis broadly follows the format of that for the main consultation paper (see para 16 above), but also includes a numerical analysis based on the responses to the four questions posed in the comment form.

Responses to public and focus group events

19. The full range of comments submitted at the public and group events was extensive, and reflected the variety of communication methods used to engage people in the consultation programme.

20. A summary of the comments from the public and focus group events at public meetings, the discussion with representatives of the Youth Parliament, school surveys, national displays and street surveys is presented in Annex E. This summary provides an indication of the range of comments and views to emerge from the consultation programme's series of public and focus group events, but is not intended as the comprehensive record of these events which is instead presented in Report 3. Comment forms completed during the drop-in surgeries have been analysed alongside those which were sent directly to SNH's LL&T Reporter Team. Summary findings from the drop-in surgeries are not, therefore, included separately in these tables.

Conclusion

21. As set out in Section 2 of the Main Report, SNH considers that the extensive consultation programme outlined above has met the statutory requirement issued by Ministers under Section 3 of the National Parks (Scotland) Act 2000 and the set aims and objectives for the consultation process.
22. Feedback on the consultation programme has in general been positive, with several respondees specifically commenting favourably on both the content and the clarity of the consultation material and the effort that had gone into the consultation process generally. Evidence collected during the consultation also suggests that most people found the various events and opportunities provided to be helpful. A small minority were critical, casting doubt on aspects of the consultation process, or SNH's analysis and the methodology underpinning it. In addition, Balfour Community Council questioned SNH's competence to be the Reporter, and a further respondent questioned the legality of our role under European Convention of Human Rights legislation.
23. SNH asked the professional facilitators it had contracted to assist with the consultation process and to make an assessment of the effectiveness of the consultation programme. This is set out in more detail in Report 4, but has concluded that, as well as allowing for effective debate and response by the many anticipated interests in the Proposal, a significant number of participants were involved in the process for the first time. Of particular note was the youth consultation, which raised the interest of young people, generated comments, identified issues, and involved establishment of a Young Persons National Park Group. In addition the primary schools consultation engaged a target audience which had not been involved before and stimulated their interest. The on-street surveys reached an adult population who do not normally attend meetings.
24. Attendance at the public meetings varied with levels tending to be greater on the periphery of the proposed area. Although overall attendance was much greater than at the meetings in 1998 and comparable with the series of meetings in summer 2000, not all the public meetings were as well attended as we had anticipated (although it is fair to say that discussions generated at them were generally lively and inclusive). These levels of attendance may have been due to a number of other factors including the inclement weather, cold nights and presence of competing events. It may also have been because of the range of other ways in which people were able to make comment. Within the area, people involved in the earlier consultations in 1998 and 2000 may also have concluded that the matters of concern to them had already been settled, or sought to raise them through their community councils or the LL&TIC reporting groups.
25. Overall, it is estimated that over 1000 people were engaged in the consultation programme. Including those who attended the national displays but who did not register or comment, it is estimated that over 5,000 people were directly engaged in one way or another and are more informed and aware of the proposal to establish a National Park in Loch Lomond and The Trossachs. Whilst this amounts to the most extensive consultation programme that SNH has ever undertaken, the evaluation has nevertheless revealed areas where there is scope for improvement in any future exercise of this type. In retrospect, we could have done better in publicising events in advance, in preparing more focused materials for particular audiences and in consulting within larger settlements. Action on these fronts should ideally have been built into an overall communications strategy from the outset and these are lessons that we can learn from in the future.

Table 1: Summary of the key elements of the range of consultation work between the Government's original announcement in 1997 and the passing of the National Parks (Scotland) Act 2000.

Date	Event	Response/output
February 1998	<i>Invitation to contribute to the National Park debate issued for comment by SNH.</i>	250 responses received.
	SNH commissions a series of research reviews to inform thinking and contribute to the debate on National Parks.	The socio-economic benefits of National Parks. Models of National Parks. Review of powers relevant to Scottish National Parks. Best practice in community participation for National Parks. Land use and economic activity in possible National Park areas in Scotland.
	National seminars on specific topics (e.g. rural development, conservation management) and national conference held.	100 organisations attended national conference. Local meetings with community councils held in Loch Lomond and the Trossachs. Bilateral talks take place with local authorities, local agencies and other interests.
October–November 1998	Public consultation on <i>National Parks for Scotland: A Consultation Paper.</i>	450 responses from individual communities and organisations. Approximately 250 people attend a series of 5 public meetings in the Loch Lomond and Trossachs area.
February 1999	Release of <i>National Parks for Scotland: SNH's Advice to Government.</i> Scottish Office responds that this advice provides the basis for the way forward	SNH respond to requests from a range of organisations and bodies for updates and presentations on the National Park proposals.
	LL&TIC set up topic based reporting groups to engage interested bodies and individuals in developing proposals for the National Park.	5 Reporting groups established, including Association of Community Councils, to consider the requirement of a National Park Plan and offer comment on the developing National Parks (Scotland) Bill

January 2000	Scottish Executive consults on draft National Parks (Scotland) Bill.	Individuals and organisations respond to draft Bill.
June–August 2000	SNH, LL&TIC and Community Councils organise meetings to update and consult local people on the developing ideas for a LL&T National Park.	400 people attend a series of 11 meetings in the LL&T area to be up-dated on the developing proposals and consider initial thoughts on boundaries, representation and powers for a National Park.

Table 2: Breakdown of written responses to the consultation**1 Main consultation document**

By type of respondent	Code	No of responses (total/percentage)	
Individuals/individual households	A	117	36
Individual landowners/managers/factors	B	33	10
Community councils	D	22	7
Local Authorities	E	14	4
MSPs/MPs/LA Councillors	F	7	2
National agencies	G	10	3
Regional/local public agencies	H	14	4
Land management interest groups	J	4	1
Natural and cultural heritage interest groups	K	30	9
Recreation/sport interest groups	L	22	7
Social and economic interest groups	M	5	1
Professional bodies	N	6	1
Research/academic organisations and individuals	O	14	4
Other/unknown	P	3	–
By origin of response			
Within proposed Park area		107	33
Core	W1	65	
Argyll Forest Park	W2	19	
West Glen Dochart	W3	11	
Loch Earn/Ben Vorlich	W4	10	
Port of Menteith	W5	2	
Unknown	W6	0	
Adjacent Areas		22	7
Strath Blane/Strath Endrick	X1	10	
Flanders Moss	X2	3	
East Glen Dochart	X3	4	
Glen Lochay	X4	1	
SW Loch Tay	X5	2	
Glen Fruin	X6	1	

Port of Menteith	W5	8	3%
Unknown	W6	–	–
Adjacent Areas		43	19%
Strath Blane/Strath Endrick	X1	25	11%
Flanders Moss	X2	7	3%
East Glen Dochart	X3	8	3%
Glen Lochay	X4	–	–
SW Loch Tay	X5	–	–
Glen Fruin	X6	2	>1
Unknown	X7	1	>1
Others			
From within the four LA areas	Y1	68	30%
From within Scotland	Y2	18	8%
Outwith Scotland	Y3	–	–
Unknown	Z	6	1%
<i>Total</i>		223	100