

**CONSULTATION: Your Park – Transforming our loch shores**

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## **Introduction**

Scottish Land & Estates welcomes the opportunity to respond to the *Your Park - Transforming our loch shores* consultation. Scottish Land & Estates represents land owners, managers and rural businesses across Scotland, including many within Loch Lomond and the Trossachs National Park. Our members have wide ranging interests including agriculture, forestry, conservation, wildlife management and sports and activity-based tourism. As such this consultation is of considerable relevance to us.

Scottish Land & Estates is well aware of the issues of overuse and irresponsible behaviour by some members of the public that the Park Authority are trying to find solutions for. Many of our members in the Park find themselves, along with Park staff, in the unenviable position of having to deal with the aftermath of weekend and summertime camping problems. This places time and financial burdens on private landowners, managers and farmers, as well as on public services, in a way that was never the intention of Scotland's outdoor access legislation. It is clear to us that the type of camping activity that the Park Authority are trying to deal with is not responsible and is therefore outwith normal access rights, indeed it is probably infringing the access rights of others. We are clear that the current situation in the areas of the Park highlighted by the consultation document is unsustainable and cannot continue.

We are pleased to note that the Park Authority's multi-pronged management approach on the eastside of Loch Lomond has worked well. We are therefore in general terms fully supportive of similar measures being put in place in other parts of the Park. We provide specific answers to your consultation questions below.

**Investment Q1: Do you agree that over the next five years the National Park Authority should invest in improving camping provision within the three proposed Management Zones?**

We agree that the Park Authority should invest in improving camping provision within the three proposed Management Zones. We would however support Luss Estates proposal to extend the west Loch Lomond area to include the Loch Lomond Islands. The islands carry a considerable number of nature conservation designations and, because they are easily accessible, they too are under pressure. Given that Luss Estates has indicated that they would be interested in developing camping provision on two of the islands, the experience of island camping would not be removed from those wishing to enjoy it, but could in fact be enhanced with a facility appropriate to the nature of the islands.

In more general terms, the provision of a range of camping facilities provides a good opportunity for the Park Authority to continue to work positively with land owners and managers in the area that are keen to diversify their business into such provision. We are pleased to note that the Park Authority has sought expressions of interest.

**Investment Q2: Do you agree with the proposed areas of opportunity for additional camping provision (marked on map 4)?**

We agree with the new camping provision areas, but we would also ask the Park Authority to be open to other suitable suggestions from landowners and managers.

**Byelaws Q1: Do you agree that these byelaws should be introduced?**

We agree that these byelaws should be introduced. It is clear to Scottish Land & Estates that the enjoyment of these areas of the Park by those who live, work and visit, is being compromised by overuse and the irresponsible behaviour of a few. Given that other approaches have been tried and are not proving successful enough and that the introduction of byelaws to the east side of Loch Lomond has worked particularly well, we believe that the byelaw proposal makes sense. We are sure that the vast majority of residents and visitors will benefit from their introduction.

**Byelaws Q2: Do you agree with the wording of the proposed byelaws?**

We generally agree with the wording of the byelaws, however we would make the following comments in relation to the West Side of Loch Lomond / East Loch Long:

- In relation to Section 6(c) - clarity is required with regards those staying overnight in vehicles on public roads. In particular we would suggest a time limit of 24 hours is applied to laybys on the West Side of Loch Lomond (so as not to prejudice long distance commercial drivers), however on the proviso that byelaws remain enforceable in relation to Sections 8 – 11 for those users.

- Section 15 (b) – We consider that the wording of this paragraph, requires to include the words, “*where such uses are permitted by the Landlord*”.

### **Byelaws Q3: Do you agree with the proposed zones for the byelaws?**

We partially agree with the proposed zones of the new byelaws. However we would wish to see the Loch Lomond Island included within the zones covered by the byelaws and that the west Loch Lomond zone also be extended to the south of Duck Bay.

### **Conclusion**

Scottish Land & Estates is supportive of the management approach, including the introduction of byelaws, that Loch Lomond and the Trossachs National Park Authority is taking. We believe that the values of the National Park are being compromised by the current overuse and, in some instances, irresponsible use of wild camping opportunities and that the situation cannot continue. We are supportive of the wide suite of management measures proposed to tackle the problem, which includes byelaws, education and alternative camping provision.