

YOUR Park- Transforming our Lochshores Consultation Response from Friends of Loch Lomond and The Trossachs

1. Overview

As the independent conservation and heritage charity for the area covered by the Loch Lomond and The Trossachs National Park we have a strong interest in ensuring the special scenic and recreational qualities of the National Park are enjoyed by all, and in a responsible manner, to ensure the natural environment is protected and enhanced for current and future generations. We therefore fully support the National Park Authority's vision as set out in the current Partnership Plan and in section 2 (page 6) of the Your Park consultation document.

It is important, given the close proximity of the National Park to major concentrations of population and its popularity as a day trip and tourist destination, there are adequate high quality campsites and places for campervans to stop but **we do not agree that all new provision should be on sensitive and appealing lochshores simply because this is where the majority of current pressure points and problem areas are.** There is a role to be played too by neighbouring settlements and attractions, for example, by making better use of existing car parks that are currently underused overnight. There is also scope for expansion of existing holiday parks to cater more effectively for campers, camper vans and touring caravans throughout the National Park, as well as the creation of small scale camping sites at a limited number of lochside locations.

We welcome the proposals to provide financial incentives from the National Park to assist with infrastructure costs for what are often considered to be marginal private sector investments with limited returns compared to other forms of less seasonal tourist accommodation. However, we would argue that this should relate to camping provision throughout the Park and not simply on lochshore locations. The shortage of touring camping, caravanning and campervan pitches/stances is a Park-wide problem and it is important this is fully recognised in any future investment plans and policies adopted by the National Park Authority.

It is also important that there isn't an over-concentration of provision on lochshore sites which are often in sensitive locations or tightly constrained by the juxtaposition of the main tourist route network close to shorelines. We are also concerned to ensure the scale and nature of the facilities are appropriate to any particular lochshore site and, for example, we would caution against providing snack bars and catering facilities at too many sites simply to improve viability when this could have an adverse impact on the character of specific sites as well as having an adverse displacement effect on nearby well established catering facilities in more appropriate and less sensitive locations.

Historically, there has been a significant reduction in the number of holiday parks in the National Park catering for tents, touring caravans and camper vans as a result of emerging trends and market forces with many parks trading up and replacing camping pitches and touring caravan and camper van stances with more profitable types of accommodation such as static caravans and luxury lodges. This is best illustrated on West Loch Lomondside and at

the head of Loch Long where several holiday parks now exclude campers, touring caravans and camper vans and where several camping and caravan parks have been replaced by clusters of luxury holiday lodges and a large hotel with no substitute provision of camping and touring caravan facilities in what have traditionally been popular areas for camping and caravanning.

This major reduction in camping and caravanning provision has exacerbated the problems referred to in the Your Park consultation document and it would have been useful to include information in the document charting the scale of the reduction. This, until recently, has been due partially to a failure in planning policy with relaxations in the mix of accommodation types on holiday parks and limited planning conditions relating to the retention of existing and provision of new camping and touring caravan facilities to adequately address the shortage in, or near, 'hotspot' areas. Another major contributory factor has been the dynamic changes in the types of camping and caravanning, now often more appropriately described as 'glamping,' that have emerged, particularly in the last decade and more could have been made of this in the consultation document.

It is also important to bring some perspective to the scale and nature of the problems relating to camping in the National Park as many of the issues concerned with litter, toileting and anti-social behavior relate to the sheer scale of day visitors and tourists visiting popular lochside and Loch Lomond island locations and the lack of adequate infrastructure provision e.g. litter bins and toilets. The number of sites/lochshores where there are major issues relating to irresponsible campers are relatively small in number and in concentrated areas. Understandably on page 9 of the Your Park consultation document, to reinforce the case for the introduction of further management zones covered by byelaws and significant investment in camping provision, statistics for a peak day are illustrated. It would have been useful if more statistics covering a longer period of the season had featured as well to give a more complete picture of the current situation to consultees.

We agree the situation requires to be addressed and welcome some of the measures taken in recent years to successfully improve the situation on East Loch Lomondside which was a particular trouble spot. The combination of a concerted effort by different agencies working closely with local communities, the provision of new camping facilities at Salloch and the camping and no outdoor drinking ban byelaws have all contributed to a success story and led to 'paradise being rediscovered' by individuals seeking safe and quiet camping opportunities beside the lochshore. Similarly, we welcome the recent investment in improved facilities at Loch Lubnaigside and the current plans for some improvements in camping and camper van provision on Loch Venacharside.

However, we would caution on over-providing for the limited camper van market with the formalisation of spaces/stances on lochshores to the detriment of other site users such as large volume car and coach visitors. There is also a danger of 'urbanising' what should be more informal pullover over stopping places catering for a wide spectrum of the day trip and tourist markets. Notwithstanding these cautionary remarks, **we welcome the National Park Authority's bold proposals to stimulate the investment of £10 million in camping facilities and related infrastructure over a 5 year period.**

We also welcome the emphasis being placed on improving the 'visitor experience mix' as outlined section 4 of the Your Park consultation document (page10-11) and hope that in parallel with the provision of improved facilities for visitors efforts are made to invest more resources (staff and finance) in educational initiatives such as the 'Respect the Park' campaign and working with schools as well as ensuring there is a sufficiently well- resourced police and ranger presence on the ground to manage visitor pressures to ensure the byelaws proposed over a more extensive area are sensibly enforced. The consultation document is surprisingly silent on efforts to invest more in these activities and commensurate with the proposed scale of expansion of management zones which we consider is essential.

We are generally supportive of the creation of two additional management zones and the extension of the East Loch Lomond area to cover some of the busier lochside corridors in the National Park and allow for sustainable levels of camping. However, **we question the need and justification for extending coverage to the tourist routes linking lochs, the Forest Drive which is gated at night, and also settlements such as Aberfoyle and Brig o Turk which are well away from lochshores.** It is argued in the Your Park consultation document this is necessary to create more easily understood and coherent management zones and to deal with anticipated 'localised displacement'.

We disagree and consider tighter and well signposted lochside zones would be easily recognised and understood by the public. We also have a general concern about displacement issues and the danger of 'pushing visitors on' to other lochshore and riverside sites outwith the National Park where there is not the same level of investment in ranger and other visitor management services. Better, in our view, to contain and deal with the problem within the National Park area which, after all, was originally designated as a National Park and resourced appropriately to deal with visitor management pressures.

We are also disappointed the more popular Loch Lomond islands do not feature in the proposed management zones given that when the last consultation on camping byelaw options was undertaken great emphasis was placed on the need for action on some of the islands suffering from visitor pressures. Due to the combination of visitor pressures and important nature conservation designations on some of the islands we believe there is a strong case for introducing an Inchcailloch type of solution with some dedicated camping provision and toilet infrastructure linked with a permit system on some of the more popular islands. The document is surprisingly silent on the issues with only a one line reference to the Loch Lomond islands on page 21.

We are broadly supportive of the areas of opportunity for additional camping provision and are relieved much of West Loch Lomondside where the trunk road runs close to the lochshore has been excluded. However, as alluded to earlier **we do think there are other opportunities for camping provision in other parts of the National Park and they should feature in a revised and updated policy and investment plan.** For, example the provision of camping facilities in Balmaha and Killin would help to strengthen the economies of these communities and could be provided through a combination of developing new sites within, or close to, village boundaries and possible use of car parks for limited camper van parking overnight. Similarly, locations such as Loch Katrine car park could be used more for camper

vans linked to existing toilet provision and there is an opportunity to develop small scale facilities at Duck Bay linked to the provision of much needed new toilets to serve a range of markets at this busy location. There is also scope to expand camping provision in both Queen Elizabeth Forest and Argyll Forest Parks in partnership with Forestry Commission Scotland and private sector partners to compensate for the removal of camping and touring caravanning facilities which made way for high quality Forest Holiday Parks that only feature lodges that command weekly rentals as high as £1,800.

We are supportive of the extension of camping byelaws to lochshore areas within the new management zones and as highlighted earlier these zones should exclude the routes linking the lochs and associated settlements i.e. much tighter management zones than proposed. **However, we consider the byelaws should be kept under review as a change in legislation by the Scottish Government to give the Police Scotland more pan-Scotland powers to deal effectively with irresponsible or anti-social camping in a manner that recognises the 'rights' of the majority are likely to be part of the longer term solution.** We are persuaded of this point through the well-argued submission made by the former police chief for much of the area, Kevin Findlater and Ramblers Scotland.

We have not focused on the detail of the byelaws in this submission as others are better qualified to do this. However, we do have some concerns about some of the activities being criminalised under the byelaws such as responsible toileting in areas where there is no toilet provision and people are 'caught short'. We would also like to see more litter bin provision in busier tourist areas such as along the A82 corridor between Balloch and Tarbet coupled with more use generally being made of fixed penalty litter fines being imposed by rangers and the police as part of tackling this particular problem.

We welcome the proposals to introduce a permit system and believe more should have been made of this in the consultation document. This proposal is currently 'buried' in the detail of the byelaws but we consider the availability low cost permits could be part of the solution. This currently works well in regulating the number of campers on Inchcailloch and permit systems have worked well in many overseas National Parks.

We also consider **more research should be undertaken to monitor the situation with regard to camping in the area** as it is clear from discussions with senior National Park Authority staff there are significant gaps in research on issues such as users of the relatively new campsite at Salloch (e.g. Are any of the users people who used to wild camp on East Loch Lomondside or are site users new visitors? Have wild campers simply been displaced elsewhere?). The recently initiated tourist occupancy survey should also be extended to capture data on usage levels/visitor types/demographics with the cooperation of existing campsite operators to improve levels of intelligence on the market within the National Park and to monitor the impact of planned investment. It is proposed to spend £10 million on camping and associated infrastructure improvements. What level of investment in new and relevant research is planned in the same period?

2. Responses to Specific Consultation Questions

Below we respond to the specific questions raised in the consultation document in summary form but would ask that the detailed points in the overview above are taken account of in any summary document of responses prepared for the Park Authority Board and for public consumption. We would add that we are concerned that the specific questions in themselves are quite narrow in focus and are quite closed in nature. We would caution against any submission being prepared to the Park Board or the Scottish Government being based on a simple count of yes/no responses as we believe the wider points made by us, and hopefully other consultees, should be fully taken of too as the issues are more complex than set out in what understandably is a simplified form in the Your Park consultation document.

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?

A qualified yes only. We accept the need to invest in the areas of opportunity identified but we strongly consider the shortage of camping provision should not be solely met by the provision of new facilities on sensitive lochshores where there are a number of development constraints. The wider National Park area, including some of the nearby villages and existing holiday parks and attractions, have an important role to play in addressing the shortfalls, as do both the National Forest Parks, where there is plenty scope to address the needs of campers, touring caravans and camper vans without detracting from the special scenic qualities of the National Park. We would caution against developing too many lochshore sites and would make a plea to balance this carefully with the needs of the larger volumes of day visitors and tourist attracted to lochshores for relaxation and simply to enjoy the views or to participate in quiet outdoor recreational pursuits.

We strongly recommend that some of the investment planned by the National Park Authority is targeted at areas away from sensitive lochshore including some of the more economically fragile settlements such as Killin and Balmaha where there is either no, or very limited, provision of camping facilities.

We also consider existing holiday parks should be given an opportunity to benefit from any grant or incentive scheme to provide additional camping pitches and camper van stances and improved supporting facilities. This would help strengthen the appeal of these parks and could result in the cost per pitch/stance being lower as they already have some supporting infrastructure in place. It would also help reduce displacement from existing parks to new shoreline based camping facilities which is a real danger if the focus is purely on providing new camping facilities in the proposed management zones. We believe the focus should be on addressing the current National Park-wide shortfall in camping facilities as opposed to merely focusing on sensitive lochshores in the proposed management zones.

We welcome the Park Authority's stated wish to involve landowners, businesses and community organisations in the development of new camping provision and understand

there has already been over 20 expressions of interest which is encouraging. We believe there will be more interest when the Park Authority work up the detail of any grant or incentive scheme and would welcome being consulted on the detail of this in due course as we have some Trustees with expertise of developing and administering effective tourism grant schemes.

There is clearly potential for the Park Authority to act as an umbrella body for any Park-wide camping financial assistance scheme that would involve tapping into European structural funds and other Scottish Government sources to accelerate camping provision in the Park.

Clearly the timing of the introduction of any camping funding schemes and new byelaws will require careful consideration and there is a danger of rushing through new byelaws before a meaningful inroad has been made to the provision of additional camping facilities which would be unfortunate.

Investment Q2: Do you agree with the proposed areas of opportunity for additional camping provision?

In principle a qualified yes only. There is scope for some provision in the areas of opportunity but there are also many other areas of opportunity as detailed in our earlier overview and also in response to investment Q1. The areas of opportunity identified should be expanded to some areas outwith the management zones and there is also scope at some other locations within the management zones for camping and/or camper van provision e.g. Loch Katrine car park and Balmaha. We also consider there should be some limited camping provision on a couple of other Loch Lomond islands drawing on the example and success of the current campsite managed by the National Park Authority on Inchcailloch.

We consider it is very important that the National Park Authority does not simply focus on the limited proposed areas of opportunity for camping provision as featured on the map on page 19 of the consultation document. The 'net of opportunity' needs to be cast much wider to address what is a National Park-wide problem of camping under-provision. We simply do not agree that new camping provision should be restricted to parts of the proposed management zones as this will result in the scale of new camping provision required falling well short of what is required, potentially higher development costs per pitch/stance being required, the potential over-development of sensitive lochshore sites and missed opportunities to strengthen the economies of some villages, existing attractions and existing holiday parks. **A balanced mix of provision across the National Park is what is required in our view.**

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

We agree the byelaws should be introduced **as an interim measure coupled with not only with more investment in camping facilities but also importantly more investment in education, litter management/enforcement and toilet provision** to meet the needs of all visitors to what is Scotland's most heavily visited countryside destination. Sadly, the consultation document makes no reference to additional resources being deployed to tackle

these issues in the new and expanded management zones and we consider this is a major shortcoming.

We would also like to see the National Park Authority getting strongly behind proposals to change legislation at national level to give Police Scotland more powers to deal effectively with irresponsible or anti-social camping in a manner that recognises the 'rights' of the majority as we believe, like many others, that this is part of the long term solution. There is a danger of the proposed byelaws simply displacing campers outwith the National Park and further expansion of the management zones covered by byelaws in the future and this would be an unsatisfactory outcome with other parts of the country not well resourced to deal with the related management issues.

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

In principle we agree with most of the proposed wording of the byelaws but they would benefit from being tightened up as we are aware in some areas the wording is ambiguous and open to wide interpretation. For example, the wording on the areas covered need to be defined more clearly as it is currently quite vague and open to wide interpretation.

We also have some concerns about criminalising toileting over such a wide area as there are no doubt many instances where visitors genuinely try to toilet in as responsible a way as they can in the proposed management zones but in the absence of formal toilet provision this is challenging.

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

We agree and support the lochside zones for the byelaws but not the linking routes, nearby settlements and the Forest Drive for the reasons set out in the earlier overview section of this submission.

We believe the management zones should be much tighter and only cover the existing problem lochside areas as opposed to embracing 'buffer areas'. We consider it is unnecessary to include the proposed 'buffer areas' as all this will do is exacerbate the problem by displacing 'motorised wild campers' to areas on the periphery of the National Park and outside the National Park where there simply aren't the management resources available to deal with irresponsible and anti-social campers. The problem should be contained and addressed as far as possible within the National Park which was originally set up with one of the main purposes being to strengthen visitor management arrangements in Scotland's most popular countryside destination.

We are also disappointed the more popular islands of Loch Lomond have been excluded from the proposed management zones to be covered by the new byelaws and consider this is a lost opportunity to work constructively with the major landowner to improve camping and toileting facilities. The Loch Lomond islands were a strong feature of the last consultation and we are surprised they do not feature more strongly in the current consultation given they are under more pressure than some other areas and have high value

conservation designations. A major omission in our view that requires to be addressed possibly with the use of the permit scheme referred to in the byelaws which we generally support.

4. Concluding Remarks

We welcome the National Park Authority efforts to tackle the problems associated with mainly 'motorised wild campers' and accept, that as a result of greatly reduced camping and touring caravan capacity within the Park and marked changes in camping and 'glamping' trends over the past decade, a bold initiative is required to deal with the issues of irresponsible and anti-social camping. However, this needs to be kept in context as the majority of campers are responsible individuals who simply want to enjoy a quiet camping experience in the magnificent outdoors of Scotland's first National Park.

Building on the success of the package of camping and outdoor drinking bans, other management measures and associated investment in quality camping facilities on East Loch Lomondside, and more recently on the investment on Loch Lubnaigside, we are generally supportive of the National Park Authority's ambitious plans for investment in camping facilities with a range of partners, but we strongly believe this should be on a Park-wide based and not restricted solely to the limited areas identified in the Your Park consultation document.

Similarly, we are supportive of the plans to introduce additional management zones with byelaws but consider the areas covered should be much smaller and restricted to corridors alongside lochshores and within 200 metres of the road verge furthest away from lochshores. We do not consider linking routes between lochs, the Forest Drive and settlements should be covered by the byelaws and management zones as we are anxious to see any displacement being managed effectively within the National Park and not spilling out to areas outwith the National Park that are ill-equipped to deal with motorised wild camping management issues.

In parallel with this camping initiative **we would like to see the National Park Authority at the forefront of a campaign to strengthen legislation to enable the police to deal more effectively with irresponsible and anti-social camping** to avoid the need for widespread use of byelaws within the National Park and elsewhere in Scotland in the medium term. It would be a positive step in the right direction if new legislation was in place which resulted in the National Park Authority being able to repeal the existing and proposed byelaws at some future stage.

We look forward to being kept advised of any revised proposals that emerge from this consultation exercise and have welcomed senior Park Authority officials' willingness to meet with us when we were exploring and probing the background to the proposals that feature in the Your Park Consultation document.

