



16th June 2012

Charlie Croft
Loch Lomond and The Trossachs National Park Authority
Carrochan
Balloch

Loch Lomond Islands – Byelaws consultation

Dear Charlie

Loch Lomond Byelaws Consultation Response

We welcome the opportunity to comment on the public consultation on the review of the Loch Lomond Byelaws and we are also pleased that as part of the review detailed consideration is being given to improving the visitor management arrangements on a number of the more popular islands. Here there is an urgent need to improve the situation to achieve more of a balance between conserving their special qualities and catering for the basic needs of visitors in a positive and managed way with greater resource input from the Park Authority.

We wish to stress how seriously this charity takes the issues of the Loch Lomond islands, attendant visitor pressures and wildlife protection challenges. In preparing this response, we have consulted all of our 500 members (350 'public' members and some 150 business members and OUR park participants). The issues have been widely discussed by the Trustees, some of whom had the benefit of a recent trip to some of the Islands with Grant Moir. Our Director Simon Lewis has also attended the Loch Lomond stakeholders' group meetings across the last year, and our trustees, staff and volunteers have visited the islands on a number of occasions in recent years and undertaken a number of litter picks and clean-ups. We have been literally 'up to our elbows' in the issues.

The byelaws and the situation on the islands were widely discussed at our AGM in May with a debate led by Simon Lewis with some further useful input from Simon Miller of Luss Estates who own and manage a number of the islands. In addition, 5,000 copies of VOICE were distributed all over the Park and carried features on the issues and the consultation; this has generated some useful feedback. Finally, we have discussed the issues with some of our Business Supporters and OUR park businesses, particularly with those who operate on the Loch itself. The views and suggestions set out below are thus reflective of this, our own wide consultation exercise.



As was pointed out at Stakeholder meetings by SNH and others such as the Park Authority, and was separately highlighted by Luss Estates (not included in past stakeholder meetings but surely should be in the future), the islands boast an impressive array of designations for environmental protection. Consequentially we believe that the current situation should not be allowed to continue as there is clear evidence of destruction of habitat and disturbance of wildlife, high levels of littering with quantities of human waste at busy times, wanton destruction of trees for firewood and serious levels of antisocial and threatening behaviour (to many responsible loch users). We strongly refute the suggestions that there is not an issue with the Loch Lomond Islands, or that these issues are not significant. The status quo, in our view, is not an option.

However, we do understand that this is a sensitive area given that many generations of individuals and groups have been able to enjoy informal camping on the islands, and we hope if may be possible for responsible visitors and campers to be able to continue to enjoy the special appeal of 'camping in the wild' on the Loch Lomond islands. We also reflect on what seems clearly to be the success story on the Eastern shore of the Loch where according to campers the introduction of byelaws, designated camping areas/pitches and enhanced ranger/police patrols last summer resulted in 'paradise being restored' for visitors.

However, from our perspective it seems certain that sustainable access to the islands may only be possible under a combination of measures (your 'option 3') with camping bans and camping zones, stepped up patrols by the Park Authority and police (patrols must run later into the evenings of busy days/fine weather), the creation designated camping areas, and provision of dry toilets. There is no doubt in our minds that problems are clearly evident on the islands and these problems are escalating. Action is needed to help address the destructive behaviour of a significant minority of visitors. While education programmes with young people growing up around the Park to instil and encourage a sense of care for this special place are a vital long term solution - right now education and information initiatives are insufficient to tackle the current and immediate problems. Well policed byelaws and the positive provision of facilities without destroying the special qualities of the islands seems a pragmatic solution now.

We also understand that in some instances people may need to be obliged through byelaws to take more responsibility for their own actions and not to be irresponsible in their use and abuse of special places, which are there to be enjoyed and treasured by everyone. As discussed at the stakeholder meetings, we also believe that there would be more impact of any measures put in place if some prosecutions were actually followed through by the relevant authorities.

In summary:

1. we are supportive of the introduction of minor changes recommended to the existing byelaws for the loch surface with speed limits at Inverbeg;
2. we would like more action to be taken to ensure responsible behaviour on the water is enforced wherever possible, including, but beyond speed limits. An example of where increased or later patrols could have a positive impact is Luss Pier where a cluster of boats often moor overnight with those on



board becoming increasingly inebriated as the evening wears on, the disturbance for all increasing and their ability to operate craft safely on the water greatly seriously diminished. There have been some incidents where other people have not felt safe in these circumstances;

3. we are broadly in support of the 'option' 3 set out in your consultation documents and discussed at the stakeholders meetings over the last year. However we feel that 'option 3' as described is not the complete solution and suggest this could be enhanced with additional features developed and included as part of this approach as suggested below;
4. provision of groups of pitches in some carefully selected and zoned locations with dry toilets and fire pits, linked to enhanced ranger & police patrols particularly later in the evenings at busy weekends will improve matters. Timing of these patrols is crucial. Capacity of these sites will be limited and there will have to be management of numbers on the classic busy evenings and weekends when significant numbers can descend on certain beaches;
5. genuine camping in the wild should be allowed in specific locations under a permit scheme (see below) - these could be just for 1, 2 or 3 tents depending on topography/location. Such sites could be, for example in 'the narrows' or some of the sheltered coves;
6. we would welcome further consultation on proposals for specific islands, which can address the difficulty of resolving the issues affecting the most attractive 'hot spot' locations (sandy/shingle beaches etc.) on some of the islands most designated for protection.
7. We suggest serious consideration is given to additional measures along the lines of those existing in a number of North American and European National Parks, where a limited number of wild camping permits can be obtained, which allow access to certain designated remote sites which have no facilities but are clearly indicated on detailed maps. We suggest sites considered for this could include at the East end of Inches Moan and Lonaig and perhaps at one or two carefully chosen locations on Inchtavannach. This approach would allow responsible people access to camp while still providing the necessary element of control and 'traction' for your staff, rangers and the police.
8. We hope it will be possible to see some resources allocated by the Park Authority at an early stage to pilot the provision of dry toilets and camping pitches on Inchmoan.
9. We consider it is important to work closely with Luss Estates in particular to come forward with a package of measures that strike an appropriate balance between conservation and visitor management.
10. From discussions with boat operators and some boat users we are aware that there is a lack of public mooring at key points around the loch for visiting and non 'club boats' e.g. River Leven near Balloch Bridge. This needs to be addressed as part of an action plan to ensure the loch is more boat user friendly and consequently ensure there are more opportunities for visitors to spend in onshore facilities in the same way as they are, for example, in towns and villages on the upper reaches of the River Thames.



11. We suggest that there should be a 'next stage' of your process at which specific byelaws, islands and sites on these islands, are discussed in more detail. We hope we will be consulted on any next stage and would be very happy to be involved, right down to suggestions of individual pitches!

In conclusion, we agree with the Park Authority that there is scope to build further on the success of the current water and land based byelaws with firm and positive action to improve the visitor experience and to balance visitor needs with the protection of wildlife and 'wild' places on Loch Lomond. Due weight requires to be given to the significance of the conservation designations on some of the islands and the natural and recreational value that these places represent as a major asset of the National Park which must be nurtured and looked after more effectively for current and future generations.

Yours sincerely

Simon Lewis

Simon Lewis
Director