

## **RYA Scotland Objection to Loch Lomond & the Trossachs National Park Camping Management Byelaw proposals (Your Park proposals)**

Dr Aileen McLeod, MSP  
Minister for Environment, Climate Change and Land Reform  
St Andrew's House, Regent Road, Edinburgh, EH1 3DG

16<sup>th</sup> June 2015

Dear Minister

RYA Scotland wishes to sustain its objection to the proposed camping byelaws. We had proposed an exemption to the byelaw, but the National Park Authority has rejected this.

Our key objection is that the blanket ban on all camping in the zoned areas (comprising a large percentage of the accessible lochside and riverside of the national park) overrides the Access Rights given by the Land Reform Act 2003, an Act which we consider one of the finest pieces of legislation produced by the Scottish Parliament and which places Scotland as a forward-thinking country in the rights of individuals to access wild land and camp responsibly – a long-established part of the sport of cruising in small sailing craft and sailing canoes.

We consider it regressive that a national park should seek to ban such responsible camping in order to deal with vehicle-based roadside camping problems in a limited number of high-pressure areas. That this is the nature of the problem is clearly shown in the authority's 'Your Park' documentation.

We regard it as deeply inappropriate for the Park to try to ban camping as part of responsible outdoor access based on any physical activity – walking, cycling, canoeing and kayaking, fishing, as well as small boat cruising – when the one of the Park's four aims is “*promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public*” The Park should be promoting this, not seeking to inhibit it. Indeed, the opposition to these proposals of the Access Forum for the national park reinforces this very point.

**We recommend that the byelaws as proposed should be rejected and reconsidered entirely.**

Overall, we see the proposals as heavy-handed and disproportionate to the problem because:

- the zones are disproportionately large compared with the scale of the problem spots and they encompass large extents of lochside and riverside well away from the roads, and under no pressure at all, and
- better solutions to roadside camping pressures are already demonstrated within the park area by the authority's own measures – putting in suitable infrastructure to support camping and high day visitor numbers. Examples of this, illustrating a range of measures, are:

i) Salloch, East Loch Lomond – the once unsightly, overused parking area and shore land on the Rowardennan road, noted for big campsite fires, tree cutting, hi-fi noise and piles of litter,

was cleaned up 5-6 years ago and totally transformed into a small managed campsite with controlled parking, toilets & water supply, with the localised East Loch Lomond Byelaw prohibiting other camping from Balmaha to Rowardennan coupled with Stirling Council's ban on drinking alcohol outdoors in this same area. This provision has proved effective and popular.

ii) Loch Lubnaig – the former unsightly, overused layby on the A84, full of campers trying to use bushes as toilets, was cleaned up three years ago and transformed into a managed campsite with controlled parking, toilets and spaces for motorhomes. It is now an attractive spot to visit and well used. No byelaw applies to the rest of the lochside, and you can see fishermen camping in other spots, usually without problems.

iii) The National Nature Reserve on Inchcailloch – a managed, small campsite operated by the NPA (originally by the National Nature Conservancy), bookable for a small fee. The island does not have a byelaw to control the rest of the area – it's not needed. But you occasionally can see the odd wee tent of a fisherman in other spots, camping responsibly.

In addition, the failure of the NPA to consult with RYA Scotland in the drafting of the proposals, despite our early offer on this, has led to a lack of clarity about boat camping. While some boats may anchor just off the beach in shallow water, it is commonplace for small boats to beach themselves at the water's edge and for the occupants to sleep on the boat. This legality of this situation is not covered in the bylaw.

We hope you agree that the access rights from the Land Reform Act 2003 should not be over-riden in our national parks. We would welcome the opportunity to meet with you or your officials if that would be of assistance to you in clarifying the issues involved.

Yours sincerely



Fergus Duncanson  
Chairman, RYA Scotland Cruising and General Purposes Committee

### **The RYA**

The RYA is the national body for all forms of recreational and competitive boating. It represents dinghy and yacht racing, motor and sail cruising, RIBs and sportsboats, powerboat racing, windsurfing, inland cruising and personal watercraft. The RYA manages the British sailing team and Great Britain won more sailing medals than any other nation at each of the 2000, 2004, 2008 and 2012 Olympic Games.

The RYA is recognised by Government as being the primary consultative body for the activities it represents. The RYA currently has over 100,000 personal members, the majority of whom choose to go afloat for purely recreational non-competitive pleasure on coastal and inland waters. There are an estimated further 500,000 boat owners nationally who are members of over 1,500 RYA affiliated clubs and class associations.

The RYA also sets and maintains an international standard for recreational boat training through a network of over 2,200 RYA Recognised Training Centres in 47 countries. On average, approximately 160,000 people per year complete RYA training courses. RYA training courses form the basis for the small craft training of lifeboat crews, police officers and the Royal Navy and are also adopted as a template for training in many other countries throughout the world.

RYA Scotland is established to promote the sport of sailing, windsurfing and powerboating in Scotland and acts as the RYA Council for Scotland. RYAS is consulted by the Scottish Government, the Crown Estate, Local Authorities and other non-governmental bodies on a range of issues affecting recreational boating. There are approximately 150 RYA-affiliated sailing clubs and 120 RYA Recognised Training Centres in Scotland.