



**Loch Lomond and Trossachs National Park *Your Park* Proposals  
SSA summary of objection points to aid discussion with MSPs and other relevant parties.**

**Loch Lomond and Trossachs National Park (LLTNP) recently held a consultation on proposed increased camping provision and new camping management byelaws in the Park. On behalf of its members, the SSA submitted a response to this consultation in January 2015, outlining the following:**

- Our members support the proposals for increased camping provision in the Park
- Our members *do not* support the introduction of further byelaws in the Park
  - It goes against the principle in SNH Guidance for Land and Recreation Managers, which states that byelaws should be the absolute last step, to be used only where other measures have proven “insufficient, or do not prove effective...it is likely to be a measure of last resort”
  - Adequate camping and facility provision has *not* been put in place and its impact measured – only then can the need for byelaws be truly assessed
  - It places unnecessary and unfounded restriction on Scotland’s world leading access rights, set out in the Land Reform (Scotland) Act 2003
- Were these byelaws to come into place, the proposed areas within which they would apply are overly extensive and are not reflective of the extent of the issues (littering, fires, parking in laybys).

**Despite the SSA and others’ responses which were not supportive of the byelaw proposals, the Park Board in May 2015 wrote to the Minister with their final recommendations. Although slightly tweaked, the byelaws remain part of their recommendations.**

Upon submitting these recommendations to the Minister, the Park opened up a period during which interested parties could submit an objection to the Minister.

**In June 2015 the SSA submitted a [letter of objection to the Minister](#) and based on evidence which places question on the quality of the consultation process, this letter incorporates a request for an inquiry under the Local Government (Scotland) Act 1973. Our key points remain similar to the above:**

- Our members believe in the principle of byelaws as a last resort as outlined in SNH Guidance – the Park has not yet implemented adequate camping and facility provision and so it cannot be said that this is a last resort measure
- There has been a real lack of engagement from LLTNP with OPG members and the outdoor recreation sector in general, prior to the October 2014 public consultation. It seems even the Park’s Local Access Forum has not been adequately consulted
- There seems to have been flawed use of police statistics in regard to the East Loch Lomond crime figures, therefore misleading consultation respondents
- Our members are concerned that there has been Inaccurate analysis of consultation responses, namely presenting conditional responses as ‘yes’, which produced a falsely inflated representation of support for the *Your Park* proposals, specifically the proposed byelaws.

In speaking with MSPs and others on this matter, we’d urge that you draw on the above points – as a minimum, we’re asking for the Minister to give very careful consideration to the proposals and perhaps this could mean delaying a decision for 2/3 years until other measures have been put in place and their impact measured. Please encourage your MSPs to take this message forward to the Minister, Aileen McLeod MSP.