

## **BYLAW QUESTIONS**

Question 1: Do you agree that these bylaws should be introduced?

I most certainly do not agree that they should be introduced and would point out the following to illustrate why:

1. The introduction appears predicated on the 'success' of the East Loch Lomond Bylaw introduced by LL&TTNP when, in fact, there is no actual evidence that the bylaw was responsible for or even that it contributed to the success.
2. In the two or so years prior to Respect The Park, that I proposed and was signed off by all partners, I had introduced and led Operation Ironworks. This, in its first year, reduced anti social behaviour (asb) crimes and reports of such on East Loch Lomond (ELL) by 60%. This 60% reduction was an accurate figure reached after it was agreed that the only way of ensuring an accurate scale of the problem would be that all partners and communities report such to the police.
3. Despite this agreement, the 81% reduction in "crime" being heavily promoted within the LL&TTNP consultation as coming from the bylaw (and used by LL&TTNP to convince Scottish Government of the bylaw's worth in the required review), was not and most certainly would not have been reached from police figures. Indeed, the police were never asked to supply figures for the bylaw review. Instead, it is understood, that LL&TTNP staff gathered their own data from Ranger feedback. This included evidence of, for example, litter; however, to suggest, imply or even fail to qualify that this and other aspects of asb could equally and in some instances more likely have come from day-visitors not affected by the bylaw rather than wild-campers casts further doubt on the importance of the ELL bylaw on the undoubted improvement on ELL.
4. When partners agreed to the Respect The Park approach they all agreed that enforcement could not provide a lasting solution, but instead would be a sticking plaster until infrastructure, management, policy and education changes provided the necessary lasting and sustainable solution. There was no talk then about a bylaw that would ban wild camping as recognised under the Land Reform Act. This remains the case; how a National Park can have a mindset that suggests criminalising those who can be adjudged to be responsibly wild camping (and that includes in a campervan) anywhere else in Scotland, but not within LL&TTNP, must raise serious questions over LL&TTNP's real purpose behind these proposals.
5. As the architect of Respect The Park I am greatly disappointed over how cynically LL&TTNP have played up on their bylaw as having delivered success on ELL. This is so very far from the truth that I must expose this myth. I should not be alone in expressing this disappointment as success on ELL was hard won by a partnership of pertinent agencies and community members investing significant time, energy and money and, especially, working very closely together rather than just police officers and a bylaw that was only used once in three years.

6. Others have already joined me in pointing out that if a bylaw did make any difference then, thanks to the local community; it is equally as likely that it was the ban on the public consumption of alcohol, which made the significant difference rather than the camping bylaw.
7. To date there has been no prosecutions under the camping bylaw and that, alone, could be argued as proving that it served no purpose; however, this is not entirely correct. Unfortunately, the powers of police officers to deal with this form of asb, practiced by a minority who wild-camp beside a number of roadside loch and river shores throughout Scotland, are insufficient. It is certainly the case that the threat of both the camping and alcohol bylaws discouraged people from camping in the affected areas and was a useful threat of action against bylaw transgressors. However, having a bylaw simply because existing powers throughout Scotland for police officers to effectively deal with the minority causing the problems is most certainly not the best option. Instead, the best answer would be a practical, Scotland wide, solution that enables police officers to cause the removal and perhaps report this minority without recourse to exposing the responsible majority to criminalisation, especially as it is highly likely that many were genuinely unaware of an imaginary line on a map.
8. So far I have concentrated on the ELL camping bylaw and the glossy “Your Park Transforming our lochshores” does a very effective, if cynical, job of drawing comparisons with what is now proposed. Be assured, that what is proposed is much greater in terms of issue scope, geography and needless criminalising of responsible wild campers. Having, for almost 30 years and until recent retirement, resided and worked as a police officer in the “Wider Trossachs” area shown in green on the consultation maps I will use that area to provide comment.
9. Surely LL&TTNP never thought they were going to get away with the title and, indeed, throughout the whole consultation document by saying that what they are doing is about “lochshores”? An examination of the related map within the consultation document shows that instead of covering “lochshores” it is designed to take in all tourist public roads, villages and, strangely, even a forest track whether there is a “lochshore” or not? It is most certainly the case that the low incidence of asb along these routes and in these villages has nothing whatsoever to do with wild camping (tent, car, caravan, campervan or motorhome); I know this to be the case as I had policing responsibility for those areas for many years.
10. LL&TTNP have used less than a handful of sites within the whole park to blow up and grossly exaggerate the problems being caused by caravans and motorhomes. Close scrutiny of the worst of these, on Loch Earn, does not require a bylaw. Instead, what is required is resolution of the long-standing problem of who owns the land so that action can be taken to prevent further irresponsible access if it is deemed so. Better still, why not do as their partners FCS are doing and start putting parking meters into these same rural car-parks and use the profits to fund regularly emptied litter bins. LL&TTNP have proven themselves that where there is litter facilities provided this greatly reduces this blight that is just as likely to be caused by day-visitors.

11. Motorists are amongst the most vocal groups when it comes to objections against what they perceive to be unfair and arbitrary offences; usually citing the reason for such penalty is simply a money making exercise. Do LL&TTNP truly believe that it is fair to have untrained Park Rangers issuing tickets to parked cars, which a Ranger subjectively decides is causing a “nuisance” when there is neither signage nor instruction to determine what is to be a “nuisance”? Police Scotland recently underwent a process of rationalising exactly what their priorities should be and one that they rightly cut back upon was employing Traffic Wardens as this is a local authority function for which they receive the penalty monies. I cannot see Police Scotland, nor their communities, being too happy with an expectation that police officers will assume Traffic Warden responsibilities especially when the ‘criminals’ are law abiding citizens who would be behaving responsibly under exactly the same circumstances “approximately 200 yards” down the road, out with the proposed Management Zones! Worse still, is it fair on communities to expect police officers to be undertaking the same Traffic Warden duties along the whole length of FCS’s Forest Drive – I would like to be a fly on the wall when the Chief Constable of Police Scotland reads that one!
12. As I will explain later, without exception, all activities to be included within the bylaws, other than nuisance which potentially infringes civil liberties, are ones where well tested and tried legislation exists giving police and for some instances other agencies - litter for example, - power to act. The only difference here is that firstly LL&TTNP staff would have the powers, under these poorly crafted bylaws, whether they want it or not, and secondly, I suspect LL&TTNP would receive the income from any tickets issued.
13. It is also very important to cast some cold water on either the proposed bylaws or even existing or future police powers as to them stopping every aspect of asb within the park, or indeed wider Scotland. It is entirely correct that enforcement by whoever must have evidence of the crime being committed by the alleged perpetrator. Within rural areas, where witnesses are highly unlikely and technology such as CCTV non-existent having a sufficiency of evidence can be problematic and can lead to crimes being undetected. However, with appropriate powers to deal effectively with those where there is evidence that their presence or their vehicle’s presence has or will contribute to irresponsible access, the police would be in a far stronger position to reduce both the incidence and likelihood of such criminality across Scotland rather than have the unselective persecution of all within LL&TTNP. Dealing with this, as a Scotland wide issue must also be better than LL&TTNP quite happily responding to displacement by saying to communities that lie outside the park, ‘I’m alright Jack, it’s Not In My Back Yard’!
14. Crucially, despite assurances given publically and privately by senior officers within LL&TTNP and, I regret to say, myself to communities, interest groups and to elected members the promise that there would never be an extension of the ELL bylaw has proven to be disingenuous. Not only has the ELL area been needlessly extended, within the proposals, but the overall area to be covered is that of all key routes throughout the

park and this is despite a total absence of supporting evidence of asb in all but a few locations where public roads and lochshores meet. Worse still, the bylaws themselves are wholly unnecessary, draconian and drive a coach and horses through the 'right to roam' so valued in all of Scotland except, it appears, LL&TTNP. LL&TTNP in their spin say that 95% of the park is not restricted; but as they happily spin statistics how do they respond to counter spin that could equally have stated that 100% of the bylaws restricting wild camping within Scotland lie within LL&TTNP to, as they boast, "enhance the camping experience"?

15. The proposed bylaws are wholly wrong in terms of need, their purpose, their denial of 'right to roam' so important to Scotland and especially that the only area within Scotland that criminalises rights of access lies within our first National Park!
16. I have already intimated that enforcement was correctly rejected as providing a lasting solution to ELL problems; however, I am in no doubt whatsoever that a considerable police commitment, aided by later LL&TTNP funding of police activities, did make the early and continuing significant difference evidenced through the accurately measured 60% decrease in asb crime related calls in year one of Operation Ironworks. Success was achieved thanks to coordinated enforcement effort using already existing powers that police had; the arrival of the two bylaws did make the officer's jobs easier and will have helped reduce asb crimes further (though I do not sign up to the 81% reduction in crime as I question the methodology and believe that it thus misleads the public and others). However, even if the camping bylaw did play a part in the overall success I cannot accept LL&TTNP's belief that banning and criminalising otherwise law-abiding individuals is anything but wrong and unnecessary. To make matters worse, despite assurances given to the contrary, the new proposals grossly and unfairly extend the scope and geography of the bylaws in a way that must raise questions as to what are the real motivations behind the intent.
17. A far, far better and much easier to achieve solution would be to forget about these badly crafted bylaws and, instead, give the police, across Scotland, the power to deal effectively with irresponsible or anti social camping in a manner that protects the 'rights' of the majority in a way the LL&TTNP proposals most certainly do not. For all of the valid crimes and road offences mentioned the police already have existing laws and the same is true of other agencies when it comes to matters such as regulating parking or dealing with litter offences. If LL&TTNP truly wish to participate in the likes of these issues then why don't they use existing provision to have some or all of their staff trained and qualified to issue existing Fixed Penalties for these issues that the public already understand.

Question 2: Do you agree with the wording of the proposed bylaws?

Having already clearly rejected the need for the bylaws comment here could be considered superfluous. However, as the bylaw wording has serious flaws I need to say something.

1. One of the aspects of the bylaw that concerns me most is that “nuisance” has been deemed to be worthy of criminalising. Nuisance is like beauty, very much in the “eye of the beholder” where what could be considered normal behaviour by some, perhaps even the vast majority, could be considered actionable ‘nuisance’ by just one person. LL&TTNP, myself and anybody else with knowledge of the park’s problems know that many of the aspects of anti social behaviour (asb) are a direct consequence of too many people concentrated in small areas and, thereby, collectively damaging the environment and jamming up single-track roads. Had the same behaviours been only undertaken by a few then no damage would have resulted. Should we then determine that it is fair and appropriate to punish the same person doing the same thing simply because they are one of a crowd when the act is committed?
2. A good example of this type of behaviour being the consequence of too many people in too small an area being the behaviour that LL&TTNP wish to criminalise – leaving human excrement! I suspect that there is no one who relishes doing this outdoors and certainly not somewhere without facilities and where they may be seen. However, it is an unavoidable law of nature that ‘when you got to go you got to go’; in all honesty is it fair that LL&TTNP wish to criminalise this? In fairness to LL&TTNP and the wider Respect The Park they have recognised that when they, as they most certainly do, clearly state an attempt to encourage more people to visit the park they must consider what infrastructure there is to support this. That’s why toilets and litterbins within the likes of Salloch and Loch Lubnaig have seen an end to such issues and all without unnecessary criminalisation. In other words LL&TTNP needs to revert back to the Respect The Park belief that it is better infrastructure, management, policies and education that will deliver success rather than arbitrary and unfair bylaws.
3. The consultation document states that the, “Bylaws work alongside other criminal laws which are already enforceable by the police. Bylaws are an additional way of helping manage significant problems in specific areas.”
  - a. In other words the police already have the necessary laws that have been proven over time so why on earth would they wish to duplicate them?
  - b. The only conclusion must be that LL&TTNP wish to have the same powers as the police for their Rangers, but have had to invent bylaws to do so! Police officers are employed to prevent crime and to protect the public and property; by no stretch of the imagination has this been considered the responsibility of LL&TTNP Rangers. Yes, it is true, I have already argued that Rangers could, if deemed necessary, issue Fixed Penalties for litter and for illegal (not nuisance) parking; but should they really be considered suitable to deal with assault, theft and Vandalism as argued by LL&TTNP. Leaving aside their personal safety, though it really does concern me, I question what the public would think if they believed that them being assaulted was to be dealt with by an

untrained Park Ranger who is likely a volunteer member of the community!

4. The reality is that because the camping ban provision runs from 7pm to 7am the Park Rangers will all be tucked up in their beds for most of this period, leaving police officers with powers that are either a poor copy of powers they already have or make them solely responsible for Traffic Warden duties that will see them chasing and perhaps criminalising someone because they have chosen to sleep in their safely parked car so that they could get an early start on, for example, Ben Venue within The Trossachs! It is likely that I have more years experience than most other present and past police officers within the “Wider Trossachs”; I can emphatically say these are powers I would neither want nor benefit from. All I would want is that I had the power to cause the removal of the minority where there was clear evidence of asb or irresponsible behaviour having or likely to take place and that that person(s) removal, along with any vehicle would stop the problem. In doing so I would be more than happy that I had left others at this same site who were behaving responsibly – that’s what I understand to be the ‘right to roam’ that LL&TTNP appears happy to cast aside!
5. As if further proof were needed that duplicating existing laws with badly crafted bylaws was unnecessary the proposals are that the bylaws will run from 1<sup>st</sup> March to 31<sup>st</sup> October only. If the powers the police (or indeed Rangers) already have are insufficient during this period how come they are suddenly sufficient out-with this period? The only argument that LL&TTNP could put forward, I suspect, is that the pressures are less during this period. In other words it is not bad behaviour that is the issue, but rather too many people trying to access too few locations where there are insufficient facilities – this despite LL&TTNP clearly stating a desire for even more visitors. But surely that’s why, within Respect The Park, we all agreed that a lasting, sustainable solution relied on addressing the management and infrastructure aspects rather than enforcement we agreed couldn’t; strikes me that this whole plan is a case of 1, 2 ah, I can’t be bothered, 10! I suspect that my former colleagues within Police Scotland will have easily seen through this dumping of the problem onto them.
6. The unfortunate bit about all of this is that LL&TTNP, partners and communities have done tremendous work on East Loch Lomond and latterly upon Loch Lubnaig. Though significant sums were needed to deliver Salloch all it took to stop the asb and irresponsible spoiling of Lochan maol Dhuinne, just two miles further north, was the placement of several large boulders preventing vehicle access. Why has the mindset that saw the benefit of managing demand across the park through intelligent landscape and infrastructure changes suddenly changed to one where criminalising the same public they attract is the key approach?
7. Though I have previously mentioned that police already have powers to deal with the “crimes” included within the bylaws I will use one example to flag up how poorly crafted the bylaws are. “Damage” includes “death, injury or disturbance to or the taking of any wildlife”; and “wildlife” is later defined as “any species of animal or bird or in a management zone

and any species of plant (including trees) growing in a management zone.” Leaving aside the sensible legislation that already exists to protect wildlife this bylaw goes to the ridiculous level of making it a criminal offence to cut nettles, pick common flowers, collect wild fruit or, in an effort to dispose of the demon human waste, to dig a hole in a way that disturbs the sods!

8. I have already mentioned that through the introduction of “nuisance” as a criminal act it really does threaten civil liberties in a way that is wholly unacceptable and to add “damage” that is already a criminal act to the likes of “annoyance” that should never be criminalised within the definition is sheer folly!
9. Within the proposed bylaw definitions the already established and perfectly acceptable definitions for public roads and for roads authority are included; but, how does this definition stand for the several miles of forest track expected to be covered, particularly as they are closed behind locked gates between 7pm and 7am – it does not!
10. When the ELL bylaw was proposed I and a senior LL&TTNP member of staff met with the then Procurator Fiscal who, very correctly, demanded that the boundaries of both the camping and alcohol geographical limits not only be easily identified but also that it was critical in any successful prosecution that the locus of the crime be accurately given in a way that would stand scrutiny. This time around LL&TTNP believe that the following vague description of the Management Zones boundaries will suffice: “The zones generally apply from the public road down to the water’s edge and above the public road for approximately 200 metres to a distinguishable feature such as a fence or a track.”
  - i. Fair justice demands that terms such as “generally” and “approximately” must have no place in any bylaw and certainly do not meet the rightly exacting standards of the Procurator Fiscal first time around.
  - ii. This description once again perpetuates the myth that the bylaws are about “lochshores” – no they are most certainly not as the roads and villages included within Wider Trossachs prove.
  - iii. Not only are LL&TTNP prepared to criminalise people innocently accessing the countryside well away from lochshores and well away from any record of asb held by the police, but they are happily prepared to be vague about the “general” and “approximate” nature of the boundary within or out with which the wild-camper may or may not be guilty of a criminal act!
  - iv. That this boundary is “approximately 200 metres” is quite simply untrue; anybody who can read a map only needs to look at the large green area around Aberfoyle as an example and they will see how much greater the area is – and this in an area not near to a loch and not prone to the types of disorder this has set out to address! Police having powers that I mention 365 days a year and not something

limited to an imaginary green line for a few summer months would far better serve the people of Aberfoyle.

- b. The element that should truly raise concerns comes under exemptions (13 – 15 on page 27 of the Consultation); bearing in mind that LL&TTNP deem all of this necessary in the very opening sentences of the consultation document that, “Your Park is a programme to enhance the camping experience in LL&TTNP and to improve our most cherished lochshores. This is a National Park, so it is yours to enjoy and respect regardless of whether you come to our lochshores to camp, go a walk, swimming, kayaking or simply to enjoy a picnic.” If it is about the public accessing certain “lochshores” (and we have already exploded that myth) why then can LL&TTNP selectively grant permissions to whomever they deem suitable that wish to wild-camp, and of surely greater concern, that landowners and their tenants can simply ignore some or all of the bylaws should they wish. You could have the farcical and grossly unfair situation of a land-owner, for example, prepared to permit fishermen who pay for a fishing permit being permitted to wild-camp on the shores of Loch Earn whilst those sleeping in their tent or campervan right next to the fishermen but who are there to make an early start on climbing Ben Vorlich being required to move or even subject to criminalisation! Surely this must expose the folly of these badly crafted bylaws that drive a coach and horses through our equal rights to freely roam. LL&TTNP’s bad bylaw proposals most certainly disagree with the lofty sentences I quoted in opening this paragraph and give the impression that land-owners and tenants have a selective veto over who can exercise the right to roam granted under the Land Reform Act – was doing away with this not one of the reasons we needed the “right to roam” legislation in the first place?
- c. The only aspect of the wording I have some sympathy for is under paragraph 16 on page 27, but not as it stands. I have previously argued that to treat the irresponsible asb of a very few on lochshores and some rivers that adjoin public roads the solution must be Scotland wide rather than one that stands to be accused of NIMBYism through simply exporting the problems to areas that don’t have LL&TTNP’s resources or finances to deal with it. By granting Police Scotland police officers the powers to effectively deal with those quoted within the half sentence that states, “...having reasonable grounds for believing that such person is committing, has committed or is about to commit an offence...” then police officers, across Scotland, could fairly and effectively remove such persons without penalising the vast majority who would otherwise be precluded from enjoying these areas because of LL&TTNP heavy handed approach.

In conclusion, not only are the bylaws unnecessary, but they are also badly crafted, duplicate powers that police already have and, through exemptions given, have very, very real potential of being misused and unfairly applied.



### Question 3: Do you agree with the proposed zones for the bylaws?

No I most certainly do not agree as, quite simply, the Management Zones neither reflect the “lochshore” intent they were alleged to, nor do they truly represent the specific areas where there is a history of either anti social behaviour or irresponsible behaviour.

Throughout my response I have used the “Wider Trossachs” to provide example, simply because my 30 years policing experienced and local residency coincides with this area. I will continue to do so here, but for the most part the points I raise are transferrable to the other areas.

1. I have already demonstrated that anybody looking at the Wider Trossachs Management Zone shown in green on the maps will very quickly realise the need to question the constant theme within the consultation that this is dealing with “lochshore” asb. This is nothing short of a gross misrepresentation and is wholly unwarranted as there is no factual evidence of wild-camping (tent, vehicle or whatever) being responsible anywhere within the green zone other than at locations where lochs and public roads meet and perhaps two or three where there is riverside parking nearby. Having been responsible for policing this area for many years and the police being the only holders of truly empirical asb information I am certain that this is the case. Of course there were isolated incidence of anti social behaviour away from these lochshore locations, but they were exactly the same type of behaviours seen anywhere in Scotland and wild-camping of whatever type was not a factor.
2. By tarring all wild-campers with the same brush LL&TTNP will have a significant impact on those who innocently want to exercise their “right to roam” throughout all of the Management Zones where there is no history whatsoever of the type of lochside behaviour LL&TTNP say this is about. Ironically and somewhat shamefully LL&TTNP opened their consultation document saying that, “Your Park is a programme to enhance the camping experience in LL&TTNP and to improve our most cherished lochshores. This is a National Park, so it is yours to enjoy and respect regardless of whether you come to our lochshores to camp, go a walk, swimming, kayaking or simply to enjoy a picnic.” How can they say that when this will prevent those Duke of Edinburgh Award youths whom I regularly saw camp on the outskirts of Aberfoyle, or in the same area the Rob Roy Way walkers and cyclist wild-camping, or those canoe camping along the rivers, or the climbers and photographers who like to sleep in their vehicle so that they can get an early start into nearby hills? To suggest that these people could perhaps apply for an exemption in advance fails to understand the uncertainty of time and place of such activities and, in any case, I suspect that if there were a fee paying campsite nearby then that would be the sole recommendation by LL&TTNP.

3. The only reason that LL&TTNP can give is that it is to address long stay caravan and campervan usage in laybys and to prevent the spread from the lochshores. If I thought that senior managers within LL&TTNP actually believed this I would have some sympathy, but the truth is that they know this not to be the case. I have already pointed out that the long-stay caravans are limited to only a very, very few “lochshore” sites and not in the linking roads nor in the villages. Also, the answer to any parking issue would far better be resolved through establishing ownership of the problematic Loch Earn site and the police using existing legislation where parking of any vehicle is dangerous.
4. I suspect that it is overnight parking and wild-camping on the shores of the two lochs along the Forestry Commission Scotland forest drive by fishermen that has unnecessarily caused the whole forest track to be included. This problem, with these two locations, could easily have been resolved by FCS using the byelaws they had until they recently repealed them because they were unused – instead of the buck being passed to Police Scotland. Similarly, as fishing is exempt from the “right to roam” I am certain that, like any other landowner anywhere else in Scotland they would have recourse to civil action to prevent individuals overnighing at these locations should they wish to pursue this. There are lessons to be learned from how, through civil law, spontaneous and illegal Traveller sites are dealt with. Certainly, whilst police officers would never have a problem attending to these locations to deal with ongoing or reported crime, I cannot see Police Scotland or local communities being too happy that police officers will be asked to deal with overnight parking or wild-camping by otherwise law abiding fishermen within the miles of forest track on a busy weekend evening when there is likely only to be two police officers based at the local station during the 7pm – 7am period.
5. I fail to see why LL&TTNP are so obsessed by wild-camping in tents, vehicles etc. away from the problematic lochshores; there is certainly no evidence whatsoever that action on “lochshores” will move them to areas within the Management Zone that don’t have a “lochshore”. Everybody who has dealt with this issue know that IF there is to be displacement it will be to similar “lochshores” and riverside locations that adjoin public roads; it will NOT be the areas so widely zoned off by LL&TTNP. If anybody should be concerned about displacement it is those communities outside LL&TTNP who have these locations, but not the means of dealing with it. Do LL&TTNP truly care about such displacement out with the park?
6. It is a fact that there is already a shortage of campsite spaces within the LL&TTNP area with sites fully booked up for the busy summer months sometimes weeks in advance. LL&TTNP acknowledge there is a shortfall, but even if they were to realise their ambition for land-owners to meet this “business opportunity” of wild-campers (tents or vehicles) being forced to use such sites it is highly unlikely that they would meet demand so this would displace those who do not have a pitch (and their spending power in local villages) outside the park. I have already mentioned the likelihood that motorists will see, for example, the “nuisance” “parking” bylaw as a LL&TTNP money making exercise and am similarly inclined to

believe that wild-campers and especially campervan wild-campers will view this the same.

7. One significant area of concern is that the bylaws will be introduced before all but a few, if any, of the aspirational “business opportunities for land-owners” are realised. In truth had landowners wanted to exploit this “business opportunity” they would already have done so. I suspect many will question why they would want the hassle; bearing in mind the picture LL&TTNP appear to paint of those they wish to move from the “lochshores”. If proof were needed as to how naïve this “business opportunity” was they only need to look to one of the bigger land-owners within the area, RSPB, who, upon reading of the extent of the Management Zones have demanded that RSPB Reserves within LL&TTNP but presently outside the zones must be included. Of course, this also further evidences the likely spread of these Management Zones – bearing in mind promises given that the first ELL bylaw area would not.
8. The reaction of RSPB reminds me of the reaction to the ELL bylaw with communities and elected members in other areas of the park and of wider Scotland demanding they get similar bylaws. It is inevitable that, despite the proposed bylaws being unnecessary and unfit for purpose there will be a clamour for other areas within and out with the park to have the same. Unfortunately, as I have already said, the wild-camping issues throughout Scotland would far more effectively and efficiently be served by simply giving Police Scotland the power to remove those who are or are likely to cause anti social behaviour or otherwise wild-camp irresponsibly.
9. LL&TTNP have intimated that the reason they have included all of the roads and villages is to prevent any anticipated spread of asb. I have listened to senior LL&TTNP staff publically say that there was no evidence of this from ELL so why are they saying that they “anticipate’ this now when they know that this is simply not the case? Consider further, that even if such displacement to non-lochshores had been a consequence what they have consciously chosen to do is drive it out from the park boundaries for other communities and authorities to suffer! The potential for displacement out with the park that LL&TTNP even acknowledges itself within the consultation document means that it will be very difficult for them to deny accusations from those who suffer the consequent displacement that what LL&TTNP have caused demonstrates the worst form of NIMBYism.