

Wildfire Management Update Agenda Item 10

**National Park Authority Board Meeting
14 September 2026**

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1. Purpose

- 1.1. The purpose of this paper is to update Board members on the current status of wildfire risk and management planning in the National Park within the wider context of the Scottish Government Wildfire Action Plan.
- 1.2. The paper also refers to a draft wildfire position statement currently being finalised for adoption by all UK National Park Authorities which will be integral in next steps for wildfire planning in the National Park.

2. Recommendation(s)

- 2.1. Board members are asked to
 - 2.1.1. **note** the contents of this paper
 - 2.1.2. **note** (as set out in Para 11.7) that (following the current consultation) officers will finalise a recreational fire byelaw as part of the ongoing

Camping Byelaws review, and this will be presented at the next Board meeting for approval. Officers will keep under review whether additional measures are required beyond this.

3. Contribution to National Park Partnership Plan 2024-2029 and/or our Corporate Plan 2025-2030

- 3.1. Preventing and tackling wildfire in the National Park helps to deliver our outcomes to restore nature, creating a low carbon-place and designing a greener way of living.

4. Background

- 4.1. Concerns around the increased frequency, extent and impacts of wildfires have grown markedly over recent months as the reality of a changing climate has seen extremes of dry and hot weather driving drought and creating the conditions where significant wildfires have ignited across the UK and notably in Cairngorms and New Forest National Parks. This has received wide media coverage and see the emergency services and other organisations stretched in containing and extinguishing large wildfires, particularly in challenging terrain.
- 4.2. Wildfires damage and threaten livelihoods, health, wealth, and built infrastructure, alongside impacting the natural environment, such as degrading soils and harming wildlife, particularly less mobile species. They can release large volumes of carbon into the atmosphere contributing towards greenhouse gas emissions¹ and have a significant financial impact through the extensive damage caused as well as the cost of firefighting
- 4.3. Whilst we cannot predict that the extensive and damaging wildfires experienced this year will occur every summer in the UK, climate projections indicate that extreme heatwaves are becoming more frequent and therefore the risk of wildfire is likely to increase, although regional climatic differences and different land uses will make this risk variable from region to region. Alongside this phenomena warmer, wetter, and windier weather is becoming more frequent over the autumn and winter months as our climate changes.

5. Current Climate and Land Use considerations in the National Park

- 5.1. In Loch Lomond and The Trossachs our climate, similar to much of the west of Scotland, is cool and oceanic with wetter and milder weather than other regions, particularly in relation to the east of Scotland. Current rainfall levels are relatively high by UK levels with the Met Office estimating an

¹ A wildfire in the Flow Country in 2019 burned 55sq.km. of peatland doubling Scotland's greenhouse emissions over the six days it was alight. Wiltshire, J. *et al.* for WWF (2019)

average of 1581 mm/year in Balloch (compared to 984 mm/year in Aviemore, 950 mm/year in Edinburgh and 722 mm/year in London). While our wetter climate affords some protection against wildfire this is seasonably variable year on year and as the climate changes, more frequent and extreme heatwaves are likely to increase the length of time that dry conditions affect the National Park, in turn increasing the risk of wildfires.

- 5.2. Wildfire risk is also influenced by soil type and vegetation cover with wetter soils and less flammable vegetation being more resistant to fire. In broad terms heathland (dominated by heather species), long grass, arable crops, bracken, and young or pine-dominated conifer forests are more susceptible to wildfire during extended dry weather and also when green vegetation has naturally died back over the autumn and winter months. Analysis of wildfire patterns by the Scottish Fire and Rescue Service (SFRS) show that long grass followed by heathland habitats are most commonly affected by wildfires in the UK.
- 5.3. Conversely, short grassland, peatlands with a high-water table and mature broadleaved woodland are more resistant to wildfire, although it should be noted that all vegetation, along with carbon-rich peat soils, will eventually burn if a wildfire is sufficiently intense. The volume of available vegetation that a wildfire can burn through is referred to as the fuel load and extensive areas of dry vegetation are considered to have high fuel loads.
- 5.4. Across the UK vegetation cover is predominantly influenced by land use, most frequently agricultural grazing, and crops, but also forestry and recreational activity with a smaller amount of land managed for sporting (shooting) purposes. As land use largely determines the type of vegetation cover, then this also means that the type of land use in an area contributes to the level of wildfire risk during extended dry weather periods.
- 5.5. In Loch Lomond and The Trossachs, our rural landscapes are dominated by livestock grazing (estimated 62% of the National Park area) and forests and woodlands (31%) with extensive areas of longer grass, bracken and heathland found in the uplands, as well as commercial forests with a high proportion of Sitka spruce which grows well in the damp, mild climate. Pine tree species are less common here compared with the east and north of the country. Unlike some other upland areas in Scotland there is no grouse shooting industry in the National Park, which means there is no significant practice of muir burn here (where heather is deliberately managed through burning to encourage new shoots for grouse to feed on). Out of control muir burn can be a cause of wildfire in other areas but is not seen as a significant risk here.

- 5.6. Historically hill farmers also deliberately burned off some areas of upland grassland to provide livestock with fresh grass re-growth but there is no evidence that this remains a commonplace practice in the National Park today.

6. Wildfire Risk and Climate Change

- 6.1. As part of our work to tackle climate change in the National Park a [report](#) was commissioned in 2024 by Land Use Consultants Ltd. to evaluate the risks and opportunities of climate change across the Park. The report contains projections for how the climate is expected to change along with a spatial assessment and mapping of climate driven hazards, including wildfire. In terms of wildfire the report has several findings worth highlighting:
- 6.2. There are relatively few reported wildfires specific to the National Park area, however, there have been 48 reported wildfires in Argyll and Bute and Stirling Council areas between 2017 and 2023.
- There have been seven recorded case studies of high temperatures and heatwaves affecting the Park area between 2010 and 2023
 - The report identifies settlements and areas of built infrastructure adjacent to extensive areas of grassland and heathland where wildfire risk might be heightened during dry periods. It also identifies areas where protected habitats and species, visitor destinations, historic and cultural sites, and agriculture and forestry that are considered to be at higher wildfire risk.

7. History of wildfires in the National Park

- 7.1. Although wildfire can be a natural phenomenon (e.g. from lighting strikes), in the UK the vast majority of wildfires are caused by human actions whether accidental or deliberate. Within the National Park, experience and insights from our staff suggests that accidental fires associated with recreational behaviour such as campfires, barbeques and discarded cigarettes are the most likely cause of the wildfires experienced here in recent years.
- 7.2. Presently within the National Park the months that are historically associated with larger grass wildfires in the uplands is late March into early May when significant volumes of dead vegetation from the previous year can dry out as the weather turns warmer and drier. This can create a high risk of wildfire across many upland areas of Scotland and often triggers associated wildfire risk warnings in the media.

- 7.3. In 2022 an extensive upland grass fire swept over the flanks of Ben Lomond and resulted in some damage to newly planted trees on land owned by National Trust for Scotland with the most likely site of ignition being close to a hill path on the mountain. There was also a fire last year on Woodland Trust land at Glen Finglas which was started by a disposable barbeque. In April this year another extensive wildfire above the Cruach Tairbeirt area on west Loch Lomond side burnt a grassy hillside and forestry harvesting area close to the forest access road and camping permit area. All of these wildfires and the efforts to tackle them received significant press coverage at the time.
- 7.4. Recreational fires can also lead to damage and impacts that affect local communities and the visitor experience. As an example, each year the irresponsible use and disposal of single-use barbeques leads to scorch mark damage on picnic benches, recreational grass areas, lochshores and the occasional ignition and destruction of litter bins in busy public areas.

8. Recreational campfires

- 8.1. Campfires associated with wild camping in the National Park have been a feature for many years. As part of operating the Camping Management Byelaws, National Park Rangers have collected data on the number and location of campfires across Camping Management Zones for several years. Concerns around the negative, cumulative impact of campfires led to the inclusion of fire restrictions when the Camping Management Byelaws were introduced in 2017. The byelaws state that:

No person shall without lawful authority: (a) light or cause a fire within a Management Zone causing damage or likely to cause damage to a Management Zone; or (b) collect or use wood from within a Management Zone that causes damage or is likely to cause damage to a Management Zone.

- 8.2. Board members will be aware that the Camping Management Byelaws are currently going through a review process with a public consultation live until 21st September. In light of the recorded and significant increase in campfires within the Camping Management Zones, and to reduce associated environmental damage and wildfire risk, the consultation document contains a proposal to amend the current byelaw so that:

Fires must be contained and off the ground, and

Fires must be extinguished if requested by a Ranger.

9. Action on Wildfire - Roles and Responsibilities

- 9.1. Tackling wildfire is the responsibility of the Scottish Fire and Rescue Service (SFRS), although in some areas of Scotland (typically where muirburn is practised), private land managers may also collectively tackle fire if they have the equipment and experience to do so. Fire beating equipment is also sometimes seen in areas of commercial forestry to allow forestry staff to tackle small-scale wildfires.
- 9.2. In March 2026, the Scottish Government (SG) published a Strategic Action Plan on Wildfires which sets out a coordinated approach to preventing, preparing for and responding to wildfires in Scotland.

The Prevention pillar has key actions including the following actions (with associated lead bodies) relevant to Loch Lomond and The Trossachs:

- Raising public awareness to prevent wildfires starting. Note: this action specifically references SFRS working closely with key partners including National Park Authorities. (SFRS and SG to lead).
 - Creating a more robust system of wildfire danger assessments and alerts. (SG to lead).
 - Utilising the Natural Environment (Scotland) Act 2026 to enable Scottish Ministers to make regulations that could allow National Park Authorities and local authorities to put in place fire prevention byelaws enforceable by fixed penalty notices. (SG to lead).
 - Land Management Plans for large (over 1000ha) landholdings to have regard to wildfire management in relation to complying with the Scottish Outdoor Access Code. Scottish Wildfire Forum members to consider wildfire messaging to managers of smaller landholdings. (Scottish Wildfire Forum to lead).
- 9.3. The Preparedness pillar of the plan focuses largely on strengthening the readiness of SFRS to physically tackle wildfires, alongside multi-agency planning, enhancing volunteering and firefighting assets and clarifying queries about wildfire insurance. (SFRS and SG to lead).
- 9.4. The Response pillar of the plan has actions around collaborative integrated fire management planning, incident response plans, and the trialling of a new multi-stakeholder response model in the Cairngorms National Park. (SFRS to lead).
- 9.5. The Director of Environment & Visitor Services sits on the Scottish Wildfire Forum and the UK National Park Wildfire Group and also relays information on the development and delivery of the Scottish Government Strategic Action Plan through the Park Authority. It is expected that further action will flow down through the plan in the coming months, with integrated fire

management planning also being relevant to the UK National Park Position Statement [currently in draft] covered in section 10 below.

10. Proposed UK National Park Wildfire Position Statement

10.1. Following a wave of wildfires across UK National Parks in 2025 and 2026, including the UK's largest wildfire around Dava in the north Cairngorms last year, action has been led by the CEO of Cairngorms National Park Authority to convene a UK National Park Wildfire Group and the drafting of a UK National Park Wildfire Position Statement. The forum brings lead staff together from across all the Park Authorities to share information and action, while the position statement aims to bring all Park Authorities together and focus on aligning collective actions to better reduce the risk of wildfire, better prepare for wildfires that do start and mitigate impacts of wildfires across all National Parks.

10.2. The position statement which is awaiting final sign off by UK National Park Authorities and Board members are asked to note the following key points contained within the draft statement:

- Nature restoration objectives that are common to the majority of National Parks include woodland expansion, peatland restoration, and herbivore management. These are long-term, high-priority objectives to help tackle the twin nature and climate crises, but tensions do exist across the land management sector regarding how best to manage risks around rising vegetation fuel loads that can increase across landscapes during periods of woodland establishment or herbivore reduction.
- Increasing visitor numbers have the potential to increase wildfire risk at times of extended hot and dry weather.
- National Park Authorities are best placed to focus their efforts on the prevention of wildfires as their work, led by strategic plans, stretches across engagement with large numbers of visitors, local communities and businesses including the land management community, alongside statutory access functions.

10.3. Specifically, Board members are asked to note that currently the draft position statement contains proposed commitments that the Park Authority would be party to including:

- Specific wildfire management objectives within our next National Park Partnership Plan
- Leading or helping to prepare an Integrated Wildfire Management Plan for the National Park

- Having a wildfire lead officer in our staff
- Coordinating public messaging on wildfire management (as appropriate)
- Sharing best practise through the UK National Park Wildfire Group.

11. Focus of the National Park Authority

- 11.1. Our action on wildfire focuses predominantly on messaging around prevention and this remains our highest priority given our role and statutory aims. Through our Ranger Service, Communications and Educational Teams we engage with visitors (particularly campers) through the spring and summer months to have clear online and in-person messaging on responsible fire use and the negative impacts of fire. Park Authority media platforms magnify messaging at times of high wildfire risk. Additionally, Park Authority staff at strategic and operational levels engage with Scottish Government, key public body partners, and UK National Park Authority colleagues on developments in this area. Park Authority Communications Team members are part of a newly formed national wildfire communications subgroup, convened by SFRS comms colleagues to ensure effective, aligned messaging and shared resource to improve communications and profile on wildfire comms activity.
- 11.2. Working with delivery partners we have also worked for several years through our Future Nature programme on nature restoration activities such as peatland restoration and native woodland creation that when mature help to create habitats and landscapes that are naturally more resilient to wildfire.
- 11.3. Over the remainder of this financial year, we will consider how best to take forward the commitments agreed in the finalised UK National Park Wildfire Position Statement including the development of an Integrated Wildfire Management Plan and also building wildfire risk and resilience considerations into the Park Authority Climate Change Adaptation Plan currently being drafted by officers.
- 11.4. The management of recreational fires within the Camping Management Zones is expected to be an important element in the review of the Camping Management Byelaws and subject to the results of the current consultation exercise, this provides the most immediate opportunity to introduce tighter restrictions on recreational fires within the zones during the main visitor season.
- 11.5. With regard to considering any appropriate additional powers for the Park Authority to manage wildfire risk at a wider level across the National Park (for example a byelaw banning fires completely during the spring and

summer months), legal options do exist to consider creating new byelaws that could be used to prohibit fires being started. One option is the approach now in place in the Cairngorm National Park where in the light of recent large-scale, damaging wildfires, a new byelaw was introduced this year which means that it is an offence to light a fire in the National Park between 1 April to 30 September each year. These byelaws are implemented in a similar manner to our Camping Management Byelaws and Loch Lomond Byelaws in that any penalties for offences are processed through the Office of the Procurator Fiscal not directly by Park Authority staff, although Park Rangers do engage with visitors to proactively prevent fires.

11.6. Alternatively, and as highlighted in section 9 above, Scottish Ministers now have the ability to make new regulations that could allow National Park Authorities (and local authorities) to introduce fire prevention byelaws directly enforceable by fixed penalty notices under the new Natural Environment (Scotland) Act 2026. This avoids the need for reporting cases to the Procurator Fiscal's office and would give National Park Authority officers (mostly likely Park Rangers) the power to directly issue fixed penalty notices. This byelaw route would however require a separate legislative process to go through parliament, subject to parliamentary timetables.

11.7. Whilst both of these byelaw methods are technically feasible it would be important for the National Park Authority to carefully consider its ability to introduce and enforce any new byelaws given the resourcing requirements and expected high level of public interest in any consultation. At this time, it is considered that the current Camping Byelaw review consultation and finalisation of a revised recreational fire byelaw for submission to Scottish Ministers should be completed first, before considering with any other regulatory measures are necessary. The final proposed byelaw amendments will be presented at the December Board meeting for approval and submission to Scottish Ministers.

11.8. Given the nature of current level of wildfire occurrences and risks in the National Park and the ongoing wider conversation on wildfire management taking place nationally in Scotland, officers will continue to monitor the situation and keep under review any need for any additional wildfire byelaws.

12. Risks

12.1. There are risks to the National Park and the Park Authority associated with failing to respond either appropriately or proportionately to the expected increase in wildfire risk in the coming years. These risks could be strategic,

operational, financial and reputational but are best mitigated by following government level guidance along with emerging research and evidence that helps us and other relevant bodies to understand the actual levels of wildfire risk across the landscapes of the Park.

- 12.2. As part of our wider work on climate adaptation planning, we will aim to mitigate the risks associated with wildfire alongside adapting to other extreme weather events and helping all those who live, work or visit the National Park to have greater resilience in a changing climate. Officers are working to bring a draft Climate Adaptation Plan for the organisation to Board later this year.

13. Next steps

- 13.1 In the coming weeks and months officers will continue our engagement and communications work focused on preventing wildfire, move forward the Camping Management Byelaw Review and work towards developing the implementation of the various actions and commitments laid out in the Scottish Government's Strategic Action Plan on Wildfires and the UK National Park Wildfire Position Statement [currently in draft].

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