

The way forward on litter in Loch Lomond and Trossachs National Park?

Description

The inclusion of a paper [Agenda Item 9 – Reducing litter in the National Park](https://parkswatchscotland.co.uk/2016/05/17/accommodating-needs-visitors-loch-lomond-trossachs-national-park-nick-halls/) for discussion at the Loch Lomond and Trossachs National Park Board Meeting on Monday (13th June) is welcome. The paper makes a number of welcome statements, which are very relevant to the issues which have been raised on Parkswatchscotland by myself and Nick Halls (e.g <https://parkswatchscotland.co.uk/2016/05/17/accommodating-needs-visitors-loch-lomond-trossachs-national-park-nick-halls/>). Unfortunately though the paper fails to explore the full implications of these and the Park still has some way to go to articulate a comprehensive plan to address litter..

- The paper states that litter is a problem almost everywhere in Scotland and makes the implicit acknowledgement (which was absent during the whole of the Your Park consultation process on the camping byelaws) that litter is a far wider and greater problem than something caused by inconsiderate campers. What it fails to say is that the then senior management and the Park Board claimed to Ministers that the camping byelaws had solved the litter problems on east Loch Lomond: if Roseanna Cunningham had visited Balmaha last weekend she would have seen litter strewn throughout the village due to the numbers of day visitors dropping rubbish or having nowhere to put it.
- The paper states that at the heart of the National Litter Strategy, published in 2014, is the idea of prevention, of getting individuals to acknowledge responsibility and that education is the key to this. What the paper does not say is this conflicts with the claim made in the Your Park consultation that education had not worked and the only way to solve litter was to ban campers. I am delighted the paper is putting education being put to forefront again but it begs the question of why the Park ever proposed camping byelaws
- The paper describes the inconsistencies in litter collection arrangements by Local Authorities through the Park: Stirling does not provide litter bins, West Dunbartonshire and Argyll and Bute do so, but only in some places, while Perth and Kinross (which only covers a small area of the National Park) is the only Local Authority that does provide bins consistently. What the Park does not say is that the 5 Lochs Visitor Management Plan back in 2012 was supposed to have produced a litter strategy by 2013/14 which would sort this out for a large part of the Park. This was never done and now there are not even timescales for action.
- The paper reminds Board Members that in the Partnership Plan 2012-17 there was a vision for litter recycling throughout the Park that people would use. What has not been stated is that this has clearly failed, not because people are failing to use litter bins (they are overflowing where they exist) but because they have not been provided. What the paper does not say is WHY local authorities have failed to install litter bins or indeed why it has failed to do so on its own land. The paper clearly states the LLTNPA is responsible for clearing litter on the land it owns, which is to be welcome, but does not explain why there are no bins at the car parks on the parcels of land it owns around Loch Venachar
- The paper clearly states that local authorities have a duty to keep our roadsides clear of litter but makes no mention of their failures to clear litter alongside the main roads through the National Park (now partly covered by growth of vegetation because its summer) which have been

highlighted on Parkswatchscotland

- The paper refers to the Scottish marine litter strategy but makes no mention of the litter at the head of Loch Long, which is a blight to both the local community there and visitors, that has been highlighted on parkswatchscotland and is again nothing to do with campers.
- The paper provides background to the LLTNPA's new policy and procedures on Fixed Penalty Notices (fines) for littering which are included as appendices to the report. The paper makes the welcome statement that fixed Penalty Notices should be a last resort, that education should come first. The irony is that if this approach rather than the NIMBY one had been used for problems associated with campers the camping byelaws would never have been proposed. Unfortunately the paper and the accompanying policy and procedures do not explain how education first might work in practice. The reason why Countryside Rangers should have the power to issue Fixed Penalty Notices is not to turn them into a quasi police force (which is what will happen if the camping byelaws go ahead and which is why the Scottish Countryside Rangers Association objected strongly to them) but to give them "authority". It would allow Rangers to explain, when they come across evidence of people dropping litter or picnicking or camping next to a pile of rubbish, not just to explain to people why they should not do this but to ask them to clear it up then and there. If the person/people ignore them, then they can issue the fine but, with the right communication skills, I believe this should rarely be necessary.
- The biggest omission in the paper is the failure to mention the role of the Forestry Commission Scotland, the large landowner in the Park, and its role in addressing litter. So just what is it planning to do? Nor is there any mention of the role of other landowners, the positive things they are doing at present (eg Luss estates does regular litter pick-ups) but also, most importantly their role in creating litter. Farm litter in the National Park or the litter associated with some of the current industrial developments in our countryside is arguably a greater problem than any litter left by visitors.
- The paper mentions but makes no proper evaluation of flytipping, which is mostly undertaken by local people or businesses, not visitors. The huge dump on Loch Loch is another national disgrace but there are many smaller examples. Its great the LLTNPA now has powers to address this through fines but what actually is it going to do?
- The paper also fails to mention the role of local tourism businesses in generating litter. Now many businesses in the National Park have been at the forefront to clear it up but there are some businesses that generate much of the litter that is dropped, particularly in the tourism hotspots where people buy their ice creams on a sunny day and then drop the wrappers. There is no mention of what these businesses could do either to provide litter facilities or give out messages ("please put all packaging in the litter bins we have provided").
- There is also no mention of the role of the Park's own Ranger service in collecting litter. In the absence of litter bins, if they are not allowed to put litter in the Park's vehicles for alleged health and safety reasons and are forced to put this by the roadside for collection, any member of the public seeing them will do the same. And we all know what happens to rubbish left out for collection, wildlife has a feast and in doing so scatters it once again.
- The paper makes no mention of the Keep Scotland Beautiful Audit of litter in the National Park which was supposed to be published shortly after the meeting of the Board in October last year

In summary, while the paper is a useful indication of how a strategy might be developed – and therefore a step forward – it unfortunately it has been produced under a Board which up until now appears to have thought that camping byelaws would be the Park's answer to everything. The paper is welcome because it does provide an alternative to the flawed logic which led to the proposed camping

byelaws – if banning camping is the answer to litter left by campers, then banning drivers would be the answer to the litter thrown out of car windows along the A82 – and has started to suggest alternatives. If this leads to a change in approach, it is very welcome but to do so the Board will need to endorse a change in direction. Here are some suggestions about how this could be made to happen:

- The new Minister for the Environment, Roseanna Cunningham, who chairs the annual review of the Park's Partnership Plan, should call a special meeting of the Park and Local Authorities to review the lack of progress they have made on installation of litter facilities and set clear timescales for production of implementation of a litter strategy. She should also insist the Park develop a proper plan – the Five Lochs Management Plan had a section outlining the actions needed on litter which have sadly never been progressed but would provide a good starting point.
- The new Minister of the Environment should now acknowledge that campers only account for a small proportion of litter problems in the National Park and littering is not a justification for the removal of access rights.
- The LLTNPA needs to be told that its litter strategy must include a plan for addressing marine litter (including exploring the implications of the National Marine Litter strategy), farm litter, dumping and rubbish left by developers
- The LLTNPA, instead of imposing education messages on people, should engage with visitors about what messages might influence them to take even more care because it's a National Park. It should also consider how it can use people who care about the countryside most, which includes walkers and campers, to spread the message. This means engaging with the recreational organisations such as the Ramblers and all the activity organisers who use the Park at present and whose activities are now threatened by the Park's proposed bye-laws.

Category

1. Loch Lomond and Trossachs

Tags

1. Camping bye laws
2. Forestry Commission Scotland
3. landed estates
4. Litter
5. LLTNPA
6. Minister Environment
7. visitor management

Date Created

June 11, 2016

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