

## The long awaited LLTNPA litter audit, visitor management and the camping bye laws

### Description



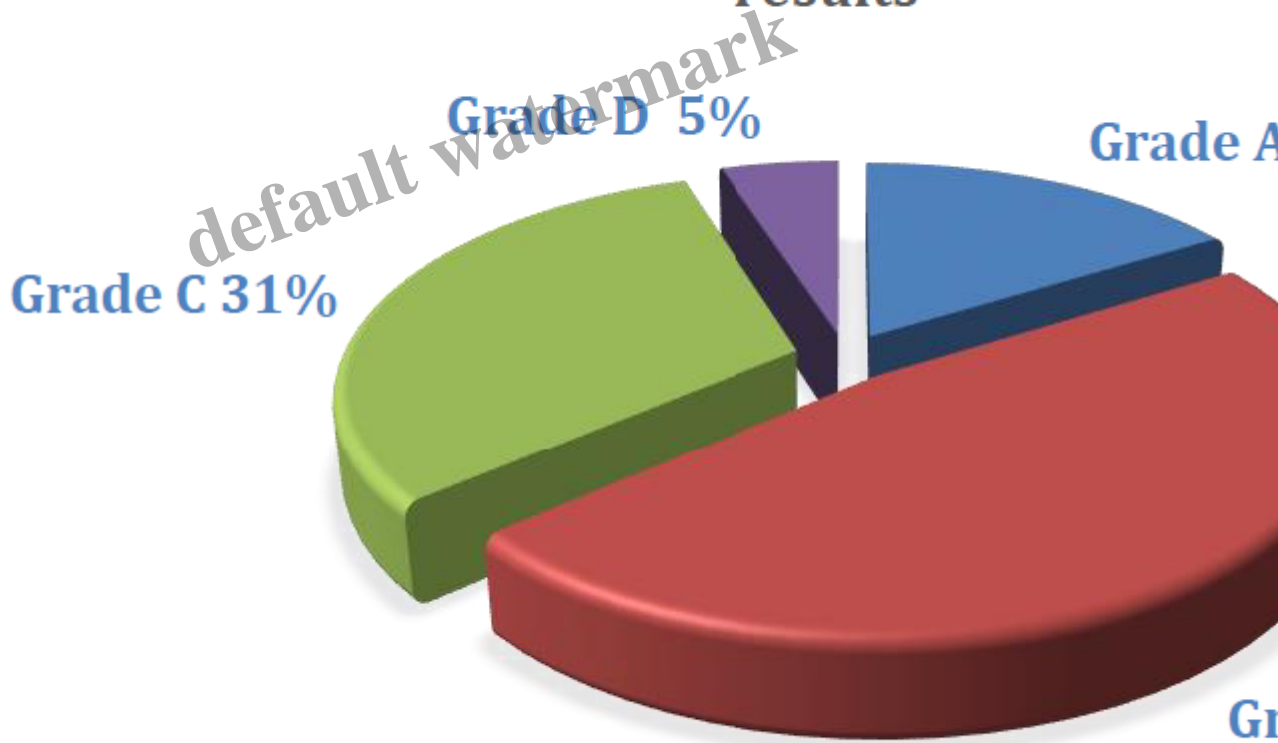
Overflowing litter bin Balmaha 12th November 2016

Last year, between June and August, the Loch Lomond and Trossachs National Park Authority commissioned Keep Scotland Beautiful (KSB) to undertake a litter audit in the four proposed camping management zones. I have been asking for the audit report ever since under FOI and last week, 13 months later, after another enquiry was told it had been received and published on the Park website ([see here](#)).

The Report consists of two documents, the first summarises the findings and the second contains a report for each of the 58 sites visited along with comments. The LLTNPA appears to have intended it as providing a baseline to assess the impact of the camping byelaws. I will deal with the methodological issues and general context at the end of this post but will first focus on the two findings that I found most striking.

## What the audit tells us about visitor management and the east Loch Lomond byelaws

**FIGURE 1 - Breakdown of overall grading b results**



The percentage totals are based on the total number of visits ie 58 sites x 8 visits = total sample of 464

The audit is very helpful in putting visitor management issues into perspective, something that the LLTNPA has lamentably failed to do: on well over half of all visits sites were in an acceptable condition. This is despite the fact that most of the sites were selected because the LLTNPA had identified them as hotspots, or more particularly camping hotspots, within the four proposed camping

management zones and despite the fact that many of these sites have no facilities.

Even more significant is the evidence allows a comparison to be made between east Loch Lomond, where a whole package of measures, including camping byelaws, has been in place for three years, and the other three zones.

**Table 5 – Breakdown of the ‘acceptable vs unacceptable’**

Management Area	Acceptable (%)
Trossachs North	66
Trossachs West	64
East Loch Lomond	71
West Loch Lomond	57

What this shows is that while a higher percentage of the six sites audited in east Loch Lomond were in acceptable condition than the other zones (and indeed it had not a single site in Category D) the difference is less than you might have thought if you believed the LLTNPA’s claims that the camping byelaws had solved all the problems on east Loch Lomond. Indeed, if you remove one site, the small inaccessible beach below the metal bridge round from Balmaha pier (another of the sites chosen) where no litter was found, the difference disappears. In other words the environment on east Loch Lomond does not appear that much better than the other areas despite the package of measures that has been in place there (one would for example expect the alcohol byelaws to have an impact on the number of drinks bottles counted by KBS, while the banning of camping has clearly had an impact on the number of abandoned tents – nil).

Furthermore, east Loch Lomond has much better infrastructure than many places in the National Park. The audit sites for East Loch Lomond also included the Sallochys campsite and visitor car park at Rowardennan both of which have toilets: so its hardly surprising less human excrement was found for the audit sites there. There are toilets at Balmaha too though this did not prevent human excrement being found at Balmaha pier – obviously nothing to do with campers as camping is banned.

What the KSB Audit clearly shows therefore is that the types of impact covered by the report are not just about campers as I and others have claimed on a number of occasions on Parkswatch (see here) and (see here) for example. This is the sort of evidence that the National Park should have included in its review of the east Loch Lomond byelaws which it and the Scottish Government then used to justify the extension of the camping ban to other areas of the Park. It didn’t, that review report was

totally flawed and so is the justification for the proposed camping byelaws. Because the litter audit provides no basis for distinguishing between impacts of campers and general visitors (see below) it does not even provide a baseline to evaluate any impact of the camping byelaws.

### **Abandoned tents are a very minor problem**

The most striking “finding” in the report is the number of abandoned tents. I must confess I looked at the table below and was initially surprised by the numbers. Out of 146 tents recorded 40 were abandoned. That sounds terrible. Aren’t campers shocking? Over a quarter of campers in the National Park are dumping their tents after use.....you can hear the outrage from the Daily Mail and that is certainly how the LLTPNA I believe want people to read this. Remember they asked for this to be reported and their main evidence for the byelaws consisted of a large number of photos of abandoned tents taken from different angles.

**Table 8 – Total recorded incidences of fire sites, tents**

<b>Area</b>	<b>Fire Sites</b>	<b>Tents</b>
<b>Trossachs North</b>	<b>383</b>	<b>80</b>
<b>Trossachs West</b>	<b>133</b>	<b>18</b>
<b>West Loch Lomond</b>	<b>283</b>	<b>48</b>
<b>East Loch Lomond</b>	<b>31</b>	<b>0</b>
<b>Overall</b>	<b>830</b>	<b>146</b>

A little analysis though puts the numbers of abandoned tents in context. We don’t know how many abandoned tents were ever cleared up:

A tent was abandoned in the camping area at the added to as the weeks went on, until there were plastic sheet left in the camping area.

The Audits were in the weekday so the tents in use column tells us nothing about the total number of campers compared to abandoned tents. For that you would need to look at the information in the LLTNPA Ranger patrol data of the total number of tents recorded. Its possible though to do a quick estimate here. On a popular weekend according to the LLTNPA there can be over 800 tents recorded on the most popular loch shores. It was a poor summer so let's halve that to 400 a weekend, add another 100 during the week and multiply that by 8 weeks. That comes to 4000 tents. The Audit found 40 abandoned tents. That shows 1% of campers abandon their tents. If you think the 4000 figure is too high, halve it, its still only 2% of campers abandoning tents. Add to that that it was a poor summer and some campers abandon tents – I know they shouldn't but it still happens – when they get flooded etc and it really does put this “problem” into context. The LLTNPA and the Scottish Government have agreed to the creation of camping byelaws and the removal of access rights from the majority of people who camp because of the activities of the 2%.



Even if campsites are installed, it does not stop the tiny minority from abandoning tents (photo previous page)

Added to this one needs to ask about the time and effort required to clear up abandoned tents. Yes, sometimes, there is a wrecked campsite which might take a couple of hours to clean up but often as in the photo above, it would take less than five minutes for someone to pack up an abandoned tent and either put it in the bin or recycle it. That's all it took Nick Halls and I earlier this year at the Ben Venue car park. We took far longer discussing with the Park Rangers whether they would take the tent or not. They wouldn't and since there was a hole in it we put it in the bin on the way home.

## Methodological and other issues in the KSB Audit

I will come back to look at the implications of some of the other findings from the audit, much of which is quite helpful, in due course but think its worth highlighting here a number of methodological and other issues which reduces the Report's usefulness. These include:

- the sites are limited to the four management zones so the Report does not tell us anything about the extent of "litter" within the management zones compared to outside
- 27 of the sites were chosen because they were included in the 2012 KSB Audit which the LLTNPA used as evidence for the need for camping byelaws. This would allow a comparison between then and now but strangely no comparison has been made.
- The audit visits (there were 8 to each site) all took place during weekdays when we know the time of greatest visitor numbers is at weekends. This means the report is unable to draw any conclusions between the litter reported and the number and type of visitor, i.e who left the litter and how great a problem this is within the context of the numbers who visited. For example the report makes clear abandoned tents were often not cleared up for weeks (and therefore the same abandoned tents and other litter was presumably counted week after week). The LLTNPA does hold data on total visitor numbers from its ranger patrol records, which appear to cover almost all the sites covered in the audit, but there is no mention of this or how it might enable the KSB findings to be seen in context.
- The report contains limited analysis of the relationship between the type of "litter" found and the type of infrastructure provided to enable visitors to enjoy the National Park. For example, KSB was asked by the Park to record fire sites and incidences of human excrement as well as litter but this is not related to whether barbecue sites or toilets were available on any one site. There is plenty of anecdotal evidence about this in the report – you can see that sites that have toilets are the ones least likely to have human excrement reported – but none of this is drawn out. While the report, in the summary for each area, lists the number of sites with litter bins and records the number of overflowing bins, there is no analysis of the relationship between litter bin provision and litter. I think if an analysis of the relationship between infrastructure and issues had been undertaken, it would have shown up the failure of the LLTNPA to provide the type of infrastructure that is needed. Instead the Report recommends that *"the Park Authority undertakes an audit of bin provision"*. This is strange because KSB appears to have this information and I find it incredible that the LLTNPA, which has repeatedly claimed it has tried for ten years to solve the litter problem on our loch shores without success and has used this to

justify the camping byelaws does not even appear to know where litter bins are provided and who should be emptying them.

- The Report does not consider the incidence of litter within the context of other visitor management measures, ranging from the alcohol byelaws in place on east Loch Lomond and around Luss (how did this impact on the numbers of alcoholic drinks cans and bottles found?) or when litter bins were emptied or even if the people who empty the bins where they exist also have responsibility for cleaning up the area.

While the Report therefore is in some ways quite limited, and the recommendations it contains appear to bear little relationship to the content, there is an opportunity to relate the evidence it provides to other data held by the LLTNPA and for more systematic analysis.

## What needs to happen

- The LLTNPA Board should discuss in public how it intends to respond to the KSB audit findings and more specifically commit to commissioning independent analysis of how the information from the audit relates to other information, including ranger patrol records, held by the Park
- The Scottish Government should use the information from the KSB to scrutinise the LLTNPA review of the east Loch Lomond byelaws (which the civil servants accepted without any apparent scrutiny) and review its findings (which would in my view undermine the case for the camping byelaws which the Scottish Government has accepted)..
- Its time the Scottish Parliament scrutinised the so-called evidence which has been used to justify the removal of access rights in the National Park
- The LLTNPA and Scottish Government need to refocus their efforts and the resources that will be wasted in trying to ban campers on provision of basic infrastructure in the National Park and targetted educational messages

There is a great opportunity for some independent research to be undertaken about the relationship between the information in the KSB audit and the data patrol records held by the Park but in the public realm and looking at how this relates to basic infrastructure.

## Category

1. Loch Lomond and Trossachs

## Tags

1. access rights
2. camping



3. Camping bye laws
4. Litter
5. LLTNPA
6. visitor management

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**Author**

nickkempe

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