

The LLTNPA is perched on the edge of a big cliff

Description



The Board rightly told staff there need to be signs telling drivers not just when they are entering a camping management zone but also when they are leaving it.

The implementation of the camping byelaws dominated the Loch Lomond and Trossachs National Park Authority Board meeting last Monday, with discussion taking place across a number of different agenda items. This is a reflection of what is happening to our National Park, its allowed all its resources and efforts to focus on one issue, and because its taken the wrong path its now perched on a big cliff. There was an indication some on the Park Board now recognise the dangers, when they elected James Stuart at the end, 9 votes to 8, as the new convener. James in his election statement ([see here](#)) had said it was time to start looking at wider look at what the Park is doing (a veiled criticism of how the Park is currently run).

I am not sure though James Stuart or most of the rest of the Board fully appreciates what a mess the Park has got itself into. I sent the questions I believe the Board needed to answer ([see here](#)) before

going ahead with the new byelaws to Linda McKay, the current Park convener, and Gordon Watson before the meeting. I have no idea if McKay and Watson shared them at the secret meeting the Board appears to have held that morning. (The evidence that there was a secret meeting is first that the visitor register showed most of the Board had signed into the building about 10am that day and second that Martin Earl – good for him for being open on this – made a reference to a Board discussion earlier in the day. That the Board continues to have secret discussions though in the morning about items it is going to discuss in the afternoon is I believe totally wrong).

Will the permit system be ready for the start of the byelaws on 1st March?

Two questions I had identified were explicitly asked about this under the Your Park agenda item:

1. David McKenzie asked if the permit system would be up and running on time? Staff gave assurances it would, and what is more said it would be fully tested, even though the the IT developer was only given the contract on 1st December and staff said that the detail of the permit system was in the process of being handed over (another 12 days lost).
2. The second question, also from David McKenzie, was whether there was a date for fixing broadband gaps in the Park to enable campers to book permits. The answer to this was a feasibility report is due early in January along with an estimate of the costs of fixing this. While there was then discussion about how good this would be for local communities many of whom cannot access broadband or mobile phone coverage at present, there was no discussion of what will happen if there is not comprehensive coverage by 1st March.

Now I think its fair enough that Board Members should accept staff assurances that the electronic booking system will be fully up and running and accessible from all the campsites and permit places in the camping management zones by 1st March. Staff had already stated very clearly in the presentation on the Board paper that the project is “on track and on budget”. However, if it turns out that this is not the case, staff need to be made responsible and heads should roll.

How will campers, campervanners and drivers know where they can sleep overnight?

The Board Paper proposed 3 types of signage:

- 6.4. Three key types of sign will be used to effectively
- When entering a Camping Management Zone (see signage) and reminders further along the road
 - Interpretation signage to provide more information on where to camp within a Camping Management Zone
 - Areas where camping is permitted (either in a designated area)

A crucial weakness in this proposal was revealed when a Board Member asked staff what signage there would be to show drivers they had LEFT a camping management zone – this is a critical question (which I had missed in my critique of the proposed signage([see here](#))). The initial response from staff was that there was no money for more signs and they did not want to add to clutter. A number of Board Members then made the point that this was unacceptable and drivers needed to know when they had left a camping management zone (otherwise for example people driving up the A82 could end up in Fort William still not knowing if they would become a criminal if they camped by the road). This meant placing clear signage that drivers could read that would indicate that they were leaving the management zones. Well done the Board! Unfortunately, as I understand it, no clear decision was then taken and it was left that staff would go away and reconsider.

After this excellent start, there was limited further discussion of other signage issues and the following key points were not addressed:



How will people who realise they are in a

camping management zone but decide to walk to the edge of it to camp know when they have reached the boundary? None of the proposed signage appears to have maps showing the boundaries as the illustration (left) for Inveruglas shows. The sign is legally wrong because it implies the whole area pictured is in the camping management zone whereas access rights I believe apply top left and is misleading unless the boundary is depicted. It appears designed to



How will people know that stopping overnight is

banned? The signs for drivers simply say you are entering a camping management zone – that tells you nothing – its only the signs for walkers on the zone boundaries (left) which clearly tells the public they can only camp where permitted. There is no signage proposed which says “stopping overnight here is a criminal offence”. Unless the “area signs” showing where you can camp are placed in every possible camping spot in the management zones people will not know they will be committing a criminal offence by stopping off overnight.

- Conversely, there is no signage proposed telling people with vehicles where they CAN stop off legally (since staying overnight on the public road network including laybys, is exempt from the camping byelaws). How will people in vehicles know which laybys are exempt. There needs to be a sign by every one where camping is allowed.

While I was encouraged the Board picked up on the need to know when one is leaving a management zone, the problem is far far greater than they identified at the meeting. People have a right to know exactly where they can and cannot camp or stop off overnight in vehicles but the proposed signage doesn't tell the public this. As long as it doesn't, the byelaws will be unenforceable. All anyone has to say is that the signage wasn't clear and any Court case would collapse. The Board's failure to understand this goes back to the flawed review of the east Loch Lomond byelaws, which attributed all improvements there to the camping byelaws. This took no account of the impact of the road to Rowardennan being a dead-end, which limited the amount of traffic, or a clearway, which prevented vehicles stopping day or night under road traffic legislation. Provision of adequate signage in new management zones is a far more complex matter and this has been neither properly considered nor budgeted for.

The byelaws are unaffordable

While staff claimed the byelaws are on budget, the Board papers and questioning by Members revealed a rather different situation:

- The £100,000 signage budget is all earmarked so there is no further money to provide the signage that is needed.
- There is no cost as yet for plugging the gaps in mobile phone reception to enable people to book permits on their phone. There doesn't appear to be a budget either.
- The Scottish Government has given a further capital grant of £85k towards a budget of £120k to scope the installation of further facilities at South Loch Earn and Forest Drive. This indicates the Park has not the funds to do this. Unfortunately no-one on the Board asked why £60k had been needed for south Loch Earn when they had previously seen at secret Board briefing sessions on more than one occasion a campsite design for Loch Earn ([see here](#)) – but perhaps that was just an artists impression? In fact why the Park spends anything like this money on a feasibility study when when a top of the range composting toilet can be installed in a remote location for £30k! I am not sure but the Park's insistence of putting all its resources (£245k this year) into the campsite no-one wants means it has no money to develop resources where they are needed.
- What Board Members did uncover though was that while giving with one hand the Scottish Government is likely to take back with the other c£45k that the Park had earmarked to be spent on cars – so what you might think? Well, this budget was for vehicles to enable Rangers to patrol the camping management zones as promised to local communities! Since the byelaws are unenforceable anyway, the Government would be well advised to take this money back to stop further waste.
- Then there was the budget line that showed that professional fees were £138,233 compared to budget of £75,900. How much of this related to the camping byelaws?
- In fact the Your Park budget was overspent and is under considerable budget pressure. The only reason the Park's overall budget is balancing is because of a large underspend on staffing. Now I had revealed previously the Park's Commercial Director had gone (he was on a big salary, c£60 from memory) and under the organisational update item Colin Bayes asked why under the

Human Resources heading why there was no reference not just the commercial director going but all the Project Manager for Your Park! Gordon Watson, the CEO, replied that it was not usual to deal with staff matters under the organisational update – so why then Gordon have a heading on Human Resources? I think Colin Bayes was absolutely right to reveal this and also that the Park had put in what he thought was adequate cover. Whether this is the case or not I think time will tell but to me it looks as though the Park is being pressed and the pips are beginning to squeak.

- The financial pressures I believe explain the recommendation in the papers that the charge for camping at Loch Chon and Loch Lubnaig should be £7 per person over 16 per night. No-one on the Board questioned the impact of this of people from Glasgow with very little money who have previously camped for free. That was very disappointing. What then happened surprised me. Linda McKay, the convener, asked staff if Forestry Commission Scotland were going to raise their charges at Salloch to £7 as she expected uniform pricing for similar facilities provided by partners. In fact Salloch will have cost lots less to construct because it has composting toilets and there is no reason to penalise campers because the Park is incapable of producing affordable infrastructure. Board Members did though question Gordon Watson how much money they would raise from the permit system – he, rightly this time, said this was impossible to predict. I suspect the financial sustainability of the whole Your Park system hangs in the balance.

The questions that were not asked or discussed by the Board

For the record, here are some the questions which I think the Board should have, but failed, to discuss.

1. What consultation has taken place on the permit systems with the Local Access Forum, a statutory consultee?
2. Will personal data be held on campers?
3. If so, how will personal data be used?
4. If so, what procedures are in place for people to correct that data and appeal against any actions taken by the Park?
5. What will be in the terms and conditions that apply to permits? How will this be enforced?
6. Given the Park's claims they don't want to discourage campervanners, despite providing only 20 places across all the management zones, what is the Board going to do about this by 1st March?
7. What procedures are going to be put into place to enforce the byelaws fairly and transparently?
8. Why are there no procedures to govern how staff will vary the number of camping permits in camping management zones?

While I welcome the fact that Board Members have become more prepared to speak out and think for themselves, as is evidenced by some of the debate and contributions last Monday, they have allowed themselves to be corralled on the edge of a big cliff and show little sign as yet that they need an alternative plan.

Category

1. Loch Lomond and Trossachs

Tags

1. access rights
2. camping
3. Camping bye laws
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