

## The LLTNPA's failure to tackle litter

### Description

# Letters

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## National park authority policy on litter is completely baffling

I, LIKE Dave Morris (Letters, December 19), attended the recent meeting of the Loch Lomond National Park Board. Indeed, I have attended all such national park authority (NPA) board meetings over the past two years without exception. I have noted with increasing incredulity over that time, the park authority's lack of willingness to engage with other authorities in any meaningful discussion with their perception of the Loch Lomond-side litter problem. There have indeed been no board discussions about what it claims as one of the key justifications for a camping ban by-law, and indeed no talks, even at NPA officer level, have taken place with other like local authority officers. This was confirmed for the first time by board member and officer statements at the last meeting. No answers on why were on offer.

It seems to me that it has been far more important to the NPA to retain the problem of littering than it is to do anything constructive at all to address the problem – such as devising a joint-action strategy, with Argyll & Bute and Stirling councils. Few litter bins are sited on Loch Lomond-side A82 laybys, and any that are so placed, are seldom emptied before their contents are re-distributed all around the area by the wind. This keeps the public's focus away from unapplied "solutions", and firmly on unsolvable "problems" instead. Most of the accumulated roadside litter left is locally well understood to originate primarily with day visitors, and A82 traffic, and not campers.

Why would any public authority pursue such a negative course of inaction on litter? Could there be a greater NPA goal of finding reason to ban camping, unless it is paid for in designated camp-sites or as paid camping permits as commercial park income, is the most pressing short-term unstated strategic objective currently confronting this authority? Mr Morris's nightmare prognosis is spot-on, once the casual criminalisation of law-abiding campers and others starts at the end of March 2017.

**Peter Jack,**  
9 George Street, Helensburgh.

FURTHER to your recent article regarding the increase of raptor species noted by gamekeepers in Scotland, this is both encouraging and confusing ("Gamekeepers report rise in raptor species on estates, claims grouse campaign group", The Herald, December 7). Just last month there were several articles in the press about the concerns of the RSPB and the Scottish Wildlife Trust regarding the on-going persecution of raptor species near grouse moors.

In the last 20 years, all over the UK there has been a significant increase in buzzard and kite numbers, which is very encouraging.

What is strange is that this trend does not appear to be replicated across vast swathes of Scotland where the habitat is ideal for these raptor species to thrive.

After spending a week and half on holiday in and around Aberfeldy and Glen Lyon area this year, we were surprised to see so few raptors. We only saw one buzzard all week.

No kites and certainly no harriers. Strange, as the surrounding habitat is ideal for these species to thrive however probably not surprising due to the proximity of so many shooting estates.

We did see several ospreys, which again was encouraging but as they don't prey on ground nesting birds, makes us all very suspicious of what is actually going on out there.

**Robin Waddell,**  
9 Blacket Place, Edinburgh.



**BLOT ON THE LANDSCAPE:** Litter has become an eyesore in Loch Lomond national park.

The second letter, while not about explicitly National Parks, could be – our National Parks are failing both wildlife and visitors

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Following my post ([see here](#)) on the discussion of litter at the last Loch Lomond and Trossachs National Park Board meeting, it was good to see Peter Jack's lead letter to the Herald. I hope this will help bring the failures of the National Park to the attention of a different audience. (And if you didn't see the excellent letter from Dave Morris the previous week on the VisitScotland initiative to promote wild camping just as the Loch Lomond and Trossachs National Park Authority is trying to ban it..... [\(see here\)](#))

After my post, a reader gently reminded me that a few years ago the LLTNPA had made a serious attempt to tackle litter. This was when Grant Moir, now Chief Executive of the Cairngorms National Park Authority, was at the LLTNPA and Kevin Findlater was Chief Inspector of the police for the Trossachs Area. Their efforts culminated in the Five Lochs Visitor Management Plan in 2012. It had a

whole page on actions to address litter which is worth reading in full.

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### Issue 1 - Litter

Litter is a significant issue for the 5 Lochs area with many of the roadsides and countryside sites afflicted by day trippers and campers leaving rubbish. There have been large national litter campaigns and also, over the last 10 years, Park-wide litter campaigns. As sites within the 5 Lochs are improved there needs to be a consistent approach to litter management both in messages to visitors, the provision of litter facilities at key sites and litter management.

At larger sites recycling points for visitors will be provided and at smaller sites either bins will be provided or a 'take your litter to the nearest recycling point' approach will be applied. Consideration will be given to looking at how all organisations can work collaboratively to reduce costs, increase consistency and improve litter services.

#### Key Outcomes

- Increase % of recycled litter in the area
- Reduce the quantity and impact of litter dropped in the area

Actions		
What	Response	Lead Partners
Infrastructure and service improvements	Litter management strategy for the area consistent across public and private organisations.	Stirling Council Perth and Kinross Council National Park Authority Forestry Commission Scotland Keep Scotland Beautiful SEPA
	The creation of recycling points at key sites to service visitors to the 5 lochs area.	National Park Authority Stirling Council Perth and Kinross Council
	Clear and concise signage in keeping with the ambience of the area promoting any agreed approach to litter management.	National Park Authority Stirling Council Perth and Kinross Council
	Undertake a litter audit in the 5 Lochs area	National Park Authority (via Keep Scotland Beautiful)
Education, outreach and volunteering	Utilise the NPA Rangers, Police, FCS Rangers and Volunteer Rangers to engage directly with the public through the provision of information and assistance on this issue	National Park Authority Forestry Commission Scotland Police
	Utilise outreach programmes and social media to promote a positive litter disposal message as part of Respect the Park.	National Park Authority Forestry Commission Scotland Keep Scotland Beautiful
Enforcement	NPA Rangers gaining Litter Warden powers from the Local Authorities or through legislative change.	Stirling Council Perth and Kinross Council National Park Authority

While I have covered on several occasions the LLTNPA's failure to implement the (excellent) plans for campsites contained in the 5 Lochs VMP, I have not covered LLTNPA's abandonment of other aspects of that plan – litter was one of them. Actions originally planned for 2012-13 – the first Keep Scotland Beautiful Litter Audit was one of them – were generally delivered but after that almost nothing:

- Litter strategy for 5 Lochs Area – planned 13/14; never delivered
- Implement new powers rangers to award fixed penalty notices – planned 13/14 – delivered June 2016
- Creation of recycling points – apparently abandoned e.g Loch Venachar north carpark constructed without recycling point which was on original plans
- Litter signage; never delivered (thought Park now spending £100k on no camping signs)

There appear two explanations for why the 5 Lochs Visitor Management Plan appears to have ground to a halt in 2013. First, Grant Moir, the driving force in the LLTNPA behind the 5 Lochs Plan left the Park Authority in that year. He was replaced by as Director of Conservation and Visitor Management by Gordon Watson who is now Chief Executive. Second, in September 2013 the Board started its secret discussion of camping byelaws. Whether the change in direction was decided by the LLTNPA Board or its senior staff, I am still trying to find out, but it does seem clear is that in 2013 the Park abandoned its plans to tackle litter and instead started to focus on how it could ban campers.

Since my post on litter and the Board Meeting, the LLTNPA has responded to questions I asked about the long delayed Keep Scotland Beautiful litter audit ([see here](#)). While the LLTNPA published the litter report soon after receiving it on 18th November, [EIR 2016-063 Response date KSB litter report received](#), what's interesting is that the LLTNPA had three meetings with Keep Scotland Beautiful about the Report in April, June and September. Its hard to see how LLTNPA could have met KSB about the report unless it had been provided with some documentation, and harder still to understand why there was 3 months between meetings unless KSB had been asked to undertake extensive re-writes. If this is right, the fact the LLTNPA holds no drafts – as stated in the letter – suggests that it has deliberately decided to destroy them. This suggests that the first draft of the report may have contained some inconvenient truths LLTNPA did not wish to see in print. (If this interpretation is wrong I would be very happy to publish a response from the Park explaining how it could have three meetings about one report and not hold any information on it).

All of this adds further support to Peter Jack's theory that in order to restrict camping rights, it has suited the Park not to have tackled the litter problem. Unfortunately I think it is unlikely the Scottish Government will order a full inquiry into the Park's failure to tackle litter because any objective look at litter would involve an examination of the failures of its own agency, Transport Scotland, to keep the verges along the trunk roads in the National Park clean. Keep Scotland Beautiful was not apparently asked to look at that.

## Category

1. Loch Lomond and Trossachs

## Tags

1. Camping bye laws
2. Litter
3. LLTNPA
4. Local Authorities
5. Scottish Government

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