

## Outdoor recreation and the National Park Partnership Plan

### WHAT OUTCOMES WILL WE FOCUS OUR EFFORTS ON TO ACHIEVE THIS VISION?



Apologies to readers

but due to problems with internet connectivity I was not able to get this post on (or next on rural development) out last week as intended. The consultation on the National Park Partnership Plan ([see here](#)) closes today.

## The LLTNPA's visitor priorities are wrong

The second section of the Loch Lomond and Trossachs National Park Authority's National Park Partnership Plan (NPPP) is titled Visitor Experience. I hate the term (it was also used by the Cairngorms National Park Authority) because its being used to change what National Parks should be about. Instead of enabling people to enjoy the landscape for itself, and being free to do so, our National Park Authorities now appear to believe their role is about giving people an experience – often it seems something to be paid for – whether or not that experience has anything to do with outdoors. This is a distortion of our National Park's statutory objective in respect to visitors which is “to promote

understanding and enjoyment, including enjoyment in the form of recreation, of the special qualities of the area by the public". Note the statutory objective relates to "the special qualities" of the National Park, not to the promotion of developments such as Natural Retreats or Flamingo Land. Many of the failures of the LLTNPA and draft NPPP result from a departure from that statutory objective.

A good example is VE3, which is about the visitor economy:

*"Businesses and organisations in the Park have taken great strides in adapting and innovating to better provide for the dynamic and ever changing tourism demand. The accommodation offering has seen many positive investments while the quality of food and drink has improved significantly. We have seen a strong increase in the number of people coming to the National Park for food and drink, up from 15% in 2011 to 44% in 2015. There has also been a rise in visitors using of self-catering, managed campsites and hotels from 2011 to 2015."*

Ignore the fact that there are now fewer places to camp in the National Park than ever before, ignore the failure of the NPPP to consider low pay and precarious jobs in the tourism industry, the LLTNPA appears to see promoting food and drink as important, if not more so, than enabling people to enjoy the Great Outdoors (and is it really credible that the numbers of people visiting the National Park is up from 15% to 44%?). The photo in this section, (left) speaks louder than words.

Tourism, whether appropriate or not, has become a substitute for sustainable economic development (the third statutory objective of the LLTNPA and subject of my last post on the NPPP). This is the wrong starting point. As the NPPP states, the vast majority of visitors to the National Park are day visitors from the Clyde conurbation. Those people – I am one of them – and overnight visitors visit primarily to enjoy the scenery and undertake recreational activities such as walking, cycling, boating or fishing. We may of course spend some money – many hillwalkers for example enjoy a meal or a drink at the end of the day and this helps explain the success of enterprises like Real Foods at Tyndrum, while other people enjoy sitting out in pleasant surroundings (hence the success of the Oak Tree Inn at Balmaha?) – but for most people this is a consequence of their visit, not a reason for it.

What appears to be happening though – and the Visitor Experience framework and the NPPP is an attempt to promote this further – is that the LLTNPA is prioritising the small minority of high spend visitors over the mass of people who visit the National Park:

*“Our visitor profile has traditionally been characterised by high numbers of predominantly day visits that coincide with good weather. Historically this has meant a highly seasonal, weather dependent visitor economy that can give us very high volume visitor pressures in some of the most popular areas of the Park. These pressures can affect the quality of environment, visitor experience, economy and community life.”*

Note how the LLTNPA claims that the high number of visitors on a few days of the year affects “the Visitor Experience”. This is a version of the same old chestnut that there are too many people on the hill – the presence of other walkers destroys the experience. Its elitist and the solution is obvious: if you don’t like other people go somewhere else when its busy. I am sure I am not the only person who avoids west Loch Lomond on public holidays but the large numbers of visitors at these times is an opportunity for the people who visit (to promote their own physical and mental wellbeing). The LLTNPA however appears to see numbers as a problem rather than a challenge and so is trying to restrict visitors through the camping byelaws (300 places under the permit system instead of maximum counts of 850 tents previously), gating off and reducing the size of car parks (e.g on Loch Venachar) and introducing charges for visiting (car park charges, toilet charges etc). There is no attempt to analyse the implications some of which are touched on the in the Strategic Environmental Assessment:

*“the new more stringent visitor management measures may erode certain personal freedoms (population and human health), negatively impacting the image of the National Park.”*

Instead of attacking access rights, the LLTNPA should be addressing the shortfall in infrastructure needed to support visitors, at both peak and non-peak periods. This includes addressing the shortfall in basic facilities which parkswatch has covered many times in the last year, particularly litter bins and toilets (no mention in the NPPP that this comes out as top need in all visitor surveys in the National Park), as well as more challenging improvements such as to transport infrastructure as recommended in the LLTNPA’s own Strategic Environment Assessment:

*“the vast majority of visitor journeys to the Park continue to be made by car. There remains a need to promote public transport options and encourage visitors to travel by alternative modes. There are also opportunities to make travel to and within the Park “part of the experience” (e.g. linking longer distance cycle routes to public transport, investing in the seasonal waterbus service).”*

The only improvement to public transport mentioned in the NPPP is the waterbus. While the CNPA are committed to improving public transport in Glenmore, the LLTNPA has no plans to encourage the provision of public transport to Rowardennan, despite Ben Lomond being completely inaccessible to

the large proportion of people who reside in the Clyde conurbation who don't have a car. This should be a national scandal.

## Parkspin

The Visitor Experience section is peppered with parkspin, which is made possible from the lack of evidence in the plan and the failure to review progress in the previous plan ([see here](#)). This is a post-truth neo-liberal world full of soundbites and where evidence doesn't count. Here are a few examples:

- *“focus on raising the level of ambition, to ensure that the quality of visitor experience in the National Park is truly world class.”*

Comment: actually, what most visitors want the National Park to do is provide basic facilities such as toilets and ensure litter is picked up. The scenery doesn't need ambition, it needs practical protection (there is no consideration of how all the new hydro tracks in the National Park contribute to the world class visitor experience).

- *“Boating and fishing continue to be popular and the availability of boating facilities (publicly-accessible piers, pontoons and moorings) continues to fall short of demand”. (VE2)*

Comment: this is the same National Park that shut the Milarochy Launching pad without consultation just a few months ago.

- *“The West Highland Line offers an outstanding rail experience but opportunities to come here via local stations are currently under-promoted” (VE3).*

Comment: last year ([see here](#)) the LLTNPA failed to respond to the reduction in cycle places on trains on the West Highland Line. Perhaps its now seen the light? The West Highland Line though needs more than promotion for people to use it. A timetable that worked for day visitors and a bus link for hillwalkers to the Arrochar Alps would be a start.

- *“Much public investment has already been targeted in raising the quality of visitor facilities in the busiest areas improving car parks, toilets, information points, litter facilities, viewpoints and campsites. This approach has achieved transformational improvements to East Loch Lomond and parts of The Trossachs through the 5 Lochs Visitor Management Plan.”(VE4).*

Comment: the reality is that there has been some (not much) public investment, much of which

has been wasted (for example £150k to date on camping management signs), the toilets the Park operates are closed for much of the year and most of the excellent proposals in the Five Lochs Visitor Management Plan have been dropped (eg for new toilets, camping areas, litter bins and wood piles for people to use) without any public explanation.

- *“There is scope for us to further develop the role of the National Park to engage with a wider range of groups in society and support recreational enjoyment, responsible behaviour and stronger appreciation of the need to look after the environment.” (VE5)*

Comment: the reality is the LLTNPA has a long history of failing to engage with recreational groups, who have been excluded from decision making processes. There is not a single proposal in the plan about how recreational and landscape interests could be given a real say in how the Park is run.

## **Commentary on Visitor Experience Outcomes and actions**

### **VE1 Recreation opportunities**

This heading is misleading, the content is about path provision. There are outdoor recreational opportunities everywhere, the issue is what infrastructure is needed to support this. There are some good practical proposals in this section – unlike most other sections of the plan – which are about what the LLTNPA will do over the next five years to improve the path network. Whether the investment is enough, however, is not considered – its not nearly enough – and all the financing is dependent on other bodies.

In my view what the plan should have done is evaluate the recreational infrastructure – is it sufficient to meet demand, what state is it in? – and then set out a case for what resources are needed. The Mountains for People project is great but it only tackles a small number of paths predominantly on publicly owned land. What is the LLTNPA going to do to address path erosion on other hills? Do the existing state management plans, which the LLTNPA has refused to release under FOI, contain any plans for paths? ([see here](#)) The NPPP gives a nod to the problem *“finding long term solutions to ensure the existing network is maintained and promoted to a high standard”* but contains no ideas let alone any proposals for how this might be addressed. How about a bed night tax as is common in the French National Parks? A small levy on overnight visitors would go a long way, as would car park charges if they were spent on paths rather than on trying to restrict access.

The absence of any context makes it hard to interpret the commitment to review core paths. Does the LLTNPA think these are sufficient or insufficient? We are given no idea. There should be a clear aspiration to increase the core path network.

## **VE2 Water based recreation**

This section lacks any concrete proposals. The spin, *“Ensuring larger lochs are managed to support and facilitate both water craft and other recreational uses while maximising safety for all users”* is contradicted by the reality which includes the Milarrochy slipway on east Loch Lomond has been closed on spurious health and safety grounds ([see here](#)), the former access point for canoes at Loch Chon has been blocked off and the Loch Venachar Quay which was gifted to the people of Callander to enjoy boating (and which happens to be adjacent to Venachar House, home of former convener Linda Mackay) has been planted with trees. There is no analysis of why numbers of boats on Loch Lomond have dropped – the water byelaws are asserted to be a success – and no practical proposals to make access to the water easier. Instead the LLTNPA is focussing on supporting high profile mass events, such as swimming, which depend on volunteers from the boating community for stewarding. The Loch Lomond Association, which represents all water users on the Loch, is not included as a stakeholder – that says it all! The development of a meaningful plan should have started with the people who use the lochs (just as plans for camping should have started with the people who camp).

## **VE3 on tourism businesses**

Priority action 1 says it all: *“Encouraging and supporting new and established tourism businesses to innovate and collaborate to capitalise on growth markets.....”*. The section then goes on to talk about *“recreation activity offerings”* and *“accommodation offerings”* and states the LLTNPA wishes to encourage private sector and other investment in facilities for motorhomes and lower cost accommodation. Nowhere does the Park set out what provision it sees as being needed or what investment might be required. That is another abdication of responsibility. The LLTNPA however apparently would prefer to leave not just delivery of facilities but also their planning to the market. Why have a NPPP or a National Park Authority if you don't believe in planning?

## **VE4 Visitor Management**

This section states its about popular areas and management of visitor pressures but again is not based on any analysis. Its proposals show that the LLTNPA has learned nothing in the last two years from the criticisms of the camping byelaws.

The first priority action, which is the Park's way of saying that it wants the camping byelaws to

continue, is both meaningless and now defunct after the LLTNPA's decision that it can no longer limit the number of campervans/motorhomes ([see here](#)): *“Ensuring that the Camping Management Zones (WestLoch Lomond, Trossachs , Trossachs North and East Loch Lomond) support improvements to the environment and visitor experience through providing for sustainable levels of camping and motorhome use alongside other visitor activities.in the camping management zones*

The second priority action *“Agreeing an approach to ensuring the sustainable and responsible use of the Loch Lomond islands”* is code for extending the camping byelaws to the Loch Lomond islands which the Board has already agreed in principle to look at. No evidence is provided to show that there is a problem that needs addressing and the failure of the LLTNPA to be open about this is another indictment of how it operates.

On the third priority action, while its a step forward that the LLTNPA has recognised the litter at the head of Loch Long as a problem that needs addressing (but if this, why not the litter along the A82 or fly tipping?), the inclusion of this action point under a section dealing with visitor management is incomprehensible. The litter at the head of Loch Long is not created by tourists but comes from the Clyde. The Park's reference to “innovative solutions” is devoid of content and therefore meaningless – what's needed are resources to clear up the mess.

The fourth priority on developing parking and traffic management measures appears to be “code” for the further introduction of car parking charges. There is nothing in the consultation asking what people think about this – another indication that this is not a proper consultation at all.

## **VE5 Diversity of visitors**

The actions in this section are again in my view meaningless. While the LLTNPA recognises that getting outdoors is good for people's health and also its difficult for many people in the Clyde conurbation to get to the National Park, there is no analysis of how its existing visitor management measures have impacted on this (the camping bylaws hit the poorest most) and not a single proposal for how the LLTNPA could make the National Park more accessible (A contrast to the Cairngorms National Park Authority who, for example, recognised there are issues about who accesses outdoor education). The Park's plan is to engage with health boards – is this really going to sort out the mess it has created? If the Park really wanted to encourage people it would not have constructed its new campsite at Loch Chon, only accessible by car. The LLTNPA claims the National Park offers a range of quality outdoor learning experiences, again with any analysis. The reality is that outdoor education provision has been hit hard by the cuts while organised groups like Duke of Edinburgh Award and the Scouts (which are working hard to welcome a wider range of young people) now face the bureaucratic rigmarole of having to apply for exemptions to the camping permit system. Judging by the number of

such exemptions, most are voting with their feet.

## What the LLTNPA needs to do

Here, in a nutshell, is an alternative agenda for promoting understanding and recreation which depends on the National Park's special qualities:

1. The LLTNPA needs to re-write its plan so it focuses on outdoor recreation and enjoyment of the countryside, not "the visitor experience" and base this on proper evidence and an analysis of what it has/has not achieved since it was created.
2. The LLTNPA needs fundamentally to change its approach to visitor management from seeing visitors as a problem to recognising the right of people to enjoy the countryside. This means dropping the existing camping byelaws and the proposals to extend them to the Loch Lomond islands and reversing other measures designed to reduce visitor numbers (such as removing gates from car parks)
3. The LLTNPA needs to get back to basics in terms of recreational provision, developing a plan describing what infrastructure is needed from litter bins and toilets to new paths and improved public transport. This should set out what can be funded from existing sources (there is money to invest, for example from Forestry Commission Scotland, through various land management grants or even from hydro schemes) and what additional investment is needed

### Category

1. Cairngorms
2. Loch Lomond and Trossachs

### Tags

1. camping
2. Camping bye laws
3. LLTNPA
4. paths
5. planning
6. public transport
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