

## The LLTNPA's data cover-up and its review of the first year of the camping byelaws

### Description

In order to ban camping and get the camping byelaws approved, the Loch Lomond and Trossachs National Park Authority misrepresented and grossly exaggerated the impacts campers were having on the loch shores. They did this by promulgating multiple images of irresponsible campers while ignoring their own data and misusing police data which put the problems in perspective. Among the things the data showed was that littering was a far more widespread problem than the LLTNPA suggested, i.e campers were far from the only cause of litter, and that the proportion of irresponsible campers and campervanners to the total was very low. What was needed to address problems associated with a few campers was a targetted response, not a blanket ban.

What the camping byelaws attempted to do, however, was to remove the rights of the many because of the actions of the few. If we took the Park's approach to people's rights – that it's ok to remove a public right if anyone abuses it – we would end up with no rights at all. If you applied the Park's approach to campers to littering along the A82, all drivers (most of the litter is chucked out of car windows) would be banned with permits then being issued to people who signed up to the Park's terms and conditions for using the A82. Totally absurd but that is what the Park has done to campers. The LLTNPA has an opportunity to address that absurdity when it considers a report to the Cabinet Secretary for the Environment, Roseanna Cunningham at the next Board Meeting on 11th December.

Regular readers will know that Parkswatch has been trying to expose how the byelaws are really working ever since they came into operation in March. In order to try and prevent the manipulation of data which took place in the Your Park consultation, after the camping "season" – as the Park now describes it – ended on 30th September, I therefore asked for data about the operation of the camping byelaws and ranger patrols to be made public before the Board meeting. What I wanted to do was to try and inform the official review of the first year of the camping byelaws.

This week, after various correspondence, the LLTNPA [EIR 2017-070 Update](#) declined to provide the data they hold, claiming they needed more time to assemble it and that they would give this to me by 7th December. This is just four days before the Board Meeting, or the day when under Standing Orders the Park need to make all Board Papers public anyway. This stinks.

Earlier this year, I made a similar request for data up until the end of June. The data request was submitted on 3rd July, a clarification made on 11th July and the Park provided me the information on

2nd August (albeit in a pretty unusable format). In other words they were able to process the data in 4 weeks. They are now claiming they need over 8 weeks to process the same data. Its actually more than that because my original data request was not on 11th October, as stated in their letter, but on 2nd October [EIR 2017-055](#).

All that is required to make the data public is for the LLTNPA to remove the columns with personal data (people's names and contact details) from the spreadsheets they hold on the booking system. Indeed they need to do this in order to provide the Board with any sort of proper analysis but are now saying this won't be ready until after that Board Paper is published. This is complete tosh and a fundamental failure in terms of being accountable to the public. Clearly what senior staff are wanting to do is once again con Board Members into approving a report on how well the byelaws are going without providing them with the full picture.

Also this week, after a reminder, I did get a partial response to the last two questions in my information request (above):

*"I refer to your email of 11th October 2017, in which you asked why the Loch Chon campsite was currently closed. The first season of the new camping management zones and byelaws is over, so the campsite has been closed to allow for any required maintenance to be undertaken over the winter season. The camp site will re-open next March."*

**Comment:** I had asked for all information about the closure of the Loch Chon campsite but instead have been told the campsite is closed because the camping byelaw season is over. I don't recall any public decision that LLTNPA campsites should only be open to the end of the byelaw season. Moreover, both Salloch and Loch Lubnaig campsites are open until the end of October. All this says is its closed because its closed. Whatever happened to the idea that what is important is the LLTNPA puts infrastructure in place to support people enjoying the countryside? It appears that senior staff have no real interest in improving facilities for campers in the National Park.

*"You had also enquired about when the Police Scotland Operation Ironworks report is due. We anticipate that we should receive this report from Police Scotland by the New Year."*

**Comment:** so the information that was seen as crucial to the justification of the camping byelaws, Police statistics on Anti-social behaviour – the Park wrongly claimed the camping byelaws were responsible for an 81% drop on anti-social behaviour on east Loch Lomond – is not even going to be available to the Board before its takes a decision on its review report to Ministers. What that says is that senior staff are just not interested in data or any information which could potentially contradict and

disprove that their propoganda that the byelaws have worked well – even they no longer claim the byelaws are an outstanding success.

## What needs to happen

The Board's review of the first year of the camping byelaws will be a farce unless this includes a proper consideration of all the relevant data. By proper consideration I mean it should have been subject to public scrutiny and engagement with stakeholders before any decision. A fair and balanced report would include among other things the following:

- A public explanation for the collapse of the byelaws in respect to campervans and the reasons for this ([see here](#))
- An analysis of the total number of people reported camping in 2017 compared to previous years and implications of this (eg ability to enjoy outdoors, displacement elsewhere)
- Adherence to the byelaws, including the numbers of campervans ignoring the ban before it officially collapsed, the numbers of tents found outwith permit areas (and whether they were doing anything wrong), numbers camping or campervanning in permit areas without a permit and the extent to which landowners are breaching the byelaws ([see here](#))
- The resources the Park has devoted to trying to get the byelaws work, particularly numbers of Ranger patrols, how rangers were used to enforce the byelaws and how this changed during the year as well and the impact this has had on other areas of work and the workforce.
- As part of this, the expenditure on signage and analysis of how effective this has been
- Analysis of the number of exemptions applied for under the camping byelaws (very few) and the impact that the byelaws have had on DofE, Scout Groups etc which have now basically decided to avoid using the National Park.
- A summary and analysis of all complaints received into the operation of the camping byelaws and how this relates to the alleged positive feedback on the permit system ([see here](#)) (senior staff failed to refer to the existence of such complaints in the report presented to the Board in September).
- A comparison of the number of abandoned campsites compared to previously (the LLTNPA while presenting lots of photos to illustrate abandoned sites did not say how many campsites had been abandoned or what resources were needed to clear these up).
- The number of permit places actually available day to day during the byelaws compared to the 300 places promised to the Scottish Government taking account of the overall fitness of each permit area for camping (many are unusable and some have now been abandoned) and factors such as flooding.
- The work the LLTNPA has undertaken to make it possible to camp in certain permit areas and the extent to which this has been successful
- The reason why certain permit areas have now been abandoned
- The consequences of trying to force campers into a few places ([see here](#))
- The impact of campers within wider context (litter etc).
- Total expenditure to date on the Loch Chon campsite compared to original budgets, evaluation of the problems caused by poor planning (stench from toilets due to inadequate water supply,

unuseable pitches etc) and .

- Progress – or rather lack of it – on infrastructure which would help reduce impact of campervans and campers (waste disposal points etc) as well as the Park's commitment to create new campsites

I do not believe such a report can be produced without engagement and consultation. The LLTNPA at its next Board Meeting therefore needs to agree to delay the submission of its report to Ministers on the operation on the byelaws until it has made public all the information it holds and allowed this to be subject to public scrutiny.

I will now submit a formal review of the LLTNPA's decision not to make crucial information for the evaluation of the camping byelaws public at the present time. There is a formal stakeholders meeting next week and I hope the stakeholders there will join the call for all this information to be made public so they also can analyse it and provide proper feedback to the LLTNPA.

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. access rights
2. camping
3. Camping bye laws
4. LLTNPA
5. Minister Environment
6. Scottish Government

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