

## Parking fines and charges in Luss and Arrochar – the wrong way to manage visitors in the Loch Lomond and Trossachs National Park

### Description

There is a case for using car park charges as an income stream to invest in visitor infrastructure and also to encourage people to visit by public transport, but that is not what is happening in the Loch Lomond and Trossachs National Park. Instead, our public authorities have embarked on an unprincipled free-for-all extortion racket which will have plenty of adverse consequences, not least for the National Park's reputation.

On the west side of Loch Lomond, the Loch Lomond and Trossachs National Park Authority (LLTNPA) has made no attempt to challenge Argyll and Bute's charges at the Cobbler car park or defend the rights of walkers ([see here](#)). Nor has it challenged the record number of parking fines Argyll and Bute Council imposed last summer (see below), just when people needed to get out in the National Park as never before.

Now the LLTNPA is considering two planning applications to install Automated Number Plate Recognition cameras on the car parks that it (or rather we, the people of Scotland) own at Tarbet and Inveruglas. These applications provide no explanation of the rationale for the cameras, how they fit with the wider visitor management context (clue, there is no plan), how much the LLTNPA intends to charge or any consideration of the consequences. These are all reasons to be very concerned.

### The Planning Applications

It is four and a half years since the Loch Lomond and Trossachs National Park Authority issued a tender for the installation of Automatic Number Plate Recognition systems for the car parks it owns at Milarrochy Bay, Inveruglas and Tarbet ([see here](#)). There is no planning application for Milarrochy, on the east shore of Loch Lomond, and the proposals there would appear to have been dropped – for the time being at least.

Although it owns the land, rather than be seen to be making a planning application to itself – which raises obvious conflicts of interest – the LLTNPA has got Parking Eye, a company based in Chorley, to make the application. The applications, were submitted on 12th January and validated on 10th February. Both are scanty, providing little justification for the proposed developments and the one for Inveruglas ([see here](#)) is not fit for purpose:

## 1. Introduction

### 1.1 Background

ParkingEye propose to install a car park management system on an existing car park owned by Argyll and Bute Council which utilises automatic number plate recognition cameras (ANPR), associated signage & P&D Machines to manage the entrance and exit of vehicles within the specified car park.

This design and access statement has been produced to accompany planning application Loch Lomond and Trossachs National Park. Inveruglas.

This report illustrates the manner in which the inclusive design and accessibility requirements for the proposed development have been considered and worked into the proposal. This report will be submitted with the planning application.

Not the easiest read!

While the Design Statement states wrongly that the land is owned by Argyll and Bute Council, in the Land Ownership certificate which forms part of the Planning Application form Parking Eye state they have served notice on Scottish and Southern Energy as owners.

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## Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

I hereby certify that

(1) - No person other than myself/the applicant was an owner [Note 4] of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application;

or –

(1) - I have/The Applicant has served notice on every person other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application was owner [Note 4] of any part of the land to which the application

Name:

Address:

Scottish and Southern Energy PLC Ten Dunkeld Road, Ten Dunkeld Road, Perth

Date of Service of Notice: \*

SSE own the power station opposite but no part of the application extends onto SSE land.

The rationale for both Planning Applications is contained in a single sentence:

*“The proposal seeks to provide management of the existing car park to reduce car park abuse and ensure that spaces are available for genuine site users”*

What is meant by reducing “abuse” is the Automated Number Plate Recognition system will prevent anyone who is not authorised from being able to stop off in the car parks, even for a couple of minutes, without being charged. The idea of car parks as a public service, necessary to assist people to enjoy the countryside, has completely disappeared. Instead, only those prepared to pay are portrayed as “genuine site users”.

Some of the potential adverse consequences have been pointed out by local people who have objected to the application at Tarbet (where currently there are no car park charges):

- The car park is used by parents dropping children off at Arrochar Primary School as its the safest place to stop off
- The car park is used by people to launch boats at the public slipway who now risk paying twice for being able to enjoy the loch

The LLTNPA has previously discussed a system which would allow local people to be exempt from car parking charges, which might deal with the issues of the school run. Other consequences, however, are less easy to address without a proper visitor management plan that covers the whole area:

- There are toilets at both Tarbet and Inveruglas, an essential facility for people travelling north, whether tourists or not, and car parking charges will inevitably deter people from using them. That will either drive visitors elsewhere or encourage more to go in the outdoors, potentially creating pollution.
- The car park at Tarbet is currently a popular overnight stopping off point for campervans and free, unlike the car park at Inveruglas, where the LLTNPA has mis-used the camping byelaws to create a campervan permit area ([see here](#)). Without additional facilities to justify the charges – for example toilets left open overnight, charging points – campervans are likely to resent the charges and move elsewhere to the detriment of local residents. For example, there have been complaints from neighbours disturbed by campervans stopping off overnight at the Slanje restaurant car park in Tarbet.
- There will also be serious consequences for the general tourist who currently want to stop off at a number of places just to have a look around and enjoy the scenery. Are they to be charged each time they do so? If so, what will that do to the reputation of the National Park as a tourist destination?

The potential for the LLTNPA to address these issues in a rational way (for example a £3 day pass that allowed visitors access to all the car parks run by Public Authorities in the National Park) has been greatly reduced by the decision to outsource responsibility for collecting the charges. The issue is well put by one of the objectors:

*“All too often organisations that own, or are responsible for the land on which the car park is located, take no responsibility for the conduct of the Parking management company that the contract, or any parking fines or disputes. Given that this car park is central to the local community in Arrochar and Tarbet, and the responsibility LLTNPA has for local communities, a condition of this planning application should be that LLTNPA remains accountable for the actions of the Parking Management provider and takes an active role in resolving issues with local residents”*

It is difficult to see how a company whose income is likely to be entirely dependent on the collection of charges could in future have any incentive to modify its contract with the LLTNPA to take account of the wider public interest.

Added to this the local communities in Tarbet and Arrochar at present face severe economic and social challenges (e.g through the closure of Shearings and the Tarbet Hotel) but despite this the LLTNPA has decided to outsource collection of charges to a company based in Chorley. This completely disregards its statutory duty to support local communities in the National Park.

## **Why is the car park charging system being installed now?**

Last year I had half wondered whether, after four years, the LLTNPA had finally seen sense and dropped its idea of trying to use car park charges as a revenue stream. But that was before Argyll and

Bute Council showed how much could be raised through the "management" of car parking:

H&L Area Scorecard FQ2 2020/21

Performance element	Status	Performance Trend	Target FQ1	Actual FQ1	Target FQ2	Actual FQ2	Owner	Comments
<b>Corporate Outcome No.2 - People live in safer and stronger communities</b>								
H&L - Number of Parking Penalty Notices Issued (Streetscene H&L)		↑	No Target	57	No Target	2,301	Hugh O'Neill	<p><b>FQ2 2020/21 H&amp;L</b> Increase in patrols in the Lomond area plus an increase of visitors, perhaps due to Covid resulting in more PCNs. Wardens from Oban have assisted, particularly at weekends. New temporary traffic regulation order for Luss, &amp; Duck Bay. The new Luss village restrictions are resulting in many PCNs being issued. These no waiting restrictions have no double yellow lines painted and few signs to alert drivers. Luss car park parking capacity has been reduced due to part of the car park being closed to allow for National Park portals.</p> <p><b>FQ1 2020/21 H&amp;L</b> During Covid restrictions, patrols of Arrochar were made at weekends due to parking issues.</p>
A&B - Number of Parking Penalty Notices Issued (StreetScene)		↑	No Target	57	No Target	2,761	Hugh O'Neill	<p><b>FQ1 &amp; FQ2 2020/21 A&amp;B</b> During FQ1 while national travel restrictions were in place, enforcement activities were reduced significantly, effectively stood down across the Council area. The only exception to this was in H&amp;L, which is in reasonable travel distance from the central belt. Even so, only limited enforcement was carried out in this area. Within H&amp;L, Luss and both Arrochar off-street car parks were closed. FQ2 saw an uptick in traffic figures, with visitor numbers increasing particularly in both Luss and Arrochar. Due to the visitor number in these villages and as a result of the TTRO in place in Luss, additional resource from was directed to H&amp;L to assist. As a result, the number of PCNs issued in H&amp;L was up circa 380% compared to FQ2 2019/20. Although the other areas are down compared to the same quarter in 2020/21, overall PCN numbers are up.</p>
Car Parking income to date - H&L (Streetscene H&L)		↑	£57,464	£4,883	£143,380	£74,169	Hugh O'Neill	<p><b>FQ1 &amp; FQ2 2020/21 H&amp;L</b> Joint financial quarter 1 &amp; 2 update: Due to the impact of COVID-19 restrictions, Amenity Wardens were stood down during lockdown period. The Amenity Wardens were diverted to assist with the food delivery programme. The travel restrictions would have had an impact on tourism and directly on the car parking income.</p>
Maitland Street, Helensburgh				£3		£63		
Pier, Helensburgh				£981		£5,080		
Arrochar				£1,240		£20,631		
Luss, Lomond				£2,660		£43,512		

Extract from the "Area Scorecard" presented to the Helensburgh and Lomond Area Committee of Argyll and Bute Council on 17th December 2020. FQ1 = 1st quarter 2020-21 i.e April-June, FQ2, 2nd quarter 2020-21, i.e July - September. The top line shows parking penalty notices for Helensburgh and Lomond, the second for Argyll and Bute as a whole and the last parking charges for Helensburgh and Lomond

The Committee Report ([see here](#)) reveals just how much money Argyll and Bute is extracting from visitors to the Loch Lomond area. While income from car parks in Quarter 2 at £74,169 was only 50% of target, this was more than compensated by a 380% increase in parking penalty notices. At £60 a time, the 2301 parking notices in quarter 2 would have raised £138,060. Almost all of this was raised at Luss and Arrochar: that was on top of the £64,143 raised from car park charges in these locations. Effectively, Argyll and Bute appears to have raised just £200k in one quarter from two visitor hotspots in the National Park.

While the levels weren't quite as high, at the LLTNPA Board in December it was reported that 1378 parking fines had been issued in the Stirlingshire part of the National Park last year ([see here](#)).

Taken together, it would be not unreasonable to assume that in the course of the year, 2020-21, the two Councils may between them have issued a staggering 5,000 parking fines within the National Park raising in the order of £300,000. All these fines would appear to have been issued to people who simply wanted to go for a walk in the countryside, in places where car parking infrastructure is inadequate and public transport often non-existent. Neither Council appears to have re-invested any of the money they have extracted from visitors in remedying infrastructure deficits. It could have been used to leverage even more money from the Rural Tourism Infrastructure Fund (a £300k contribution would trigger release of more than twice that sum from the fund).

The impact of all these charges and fines on the reputation of the National Park should not be underestimated. If there are an average of 2.5 people per car that means there are 12,500 people who have been penalised through fines alone. Over a 5 year period and it's reasonable to expect even higher numbers next summer over 60,000 will have been fined, a dreadful advert for Scotland's first National Park. Anyone who has tried to avoid the extortionate charges at the Arrochar car park and then been fined for parking elsewhere is likely to have been left with a very sour taste in their mouth.

## What needs to happen?

All of this points to the need for a coherent transport plan for the National Park as a whole aimed at supporting, not penalising visitor. The long awaited Outdoor Recreation Plan ([see here](#)) could potentially provide a framework for this. However, as I have argued before, we also need more detailed area visitor management plans within the National Park, such as those that were developed for east Loch Lomond and the Trossachs before being abandoned when Gordon Watson was appointed Chief Executive.

A plan for West Loch Lomond would look at how to support the Visitor Experience a fine is the last thing anyone wants to experience at Duck Bay, Luss, Firkin Point, Tarbet, Inveruglas, Arrochar, Ardgarten etc, including how to meet demand for parking and developing public transport alternatives. Instead, what we have is our Public Authorities doing their own thing and without any regard for the public interest.

The LLTNPA should have seized the opportunity offered by Luss Estates putting the car park at the head of Loch Long for sale ([see here](#)) to support a community buy-out for a fair price (Luss Estate are asking an immoral £150k for a site plagued with issues, from the rubbish along the shore to invasive plants). Instead, they appear more interested in feathering their own nest.

The reason the Loch Lomond and Trossachs National Park was created was to avoid this sort of free of all and ensure better co-ordination between public authorities, landowners and other stakeholders. Instead of delivering what it was set up to do, the LLTNPA has proved incapable of getting people to work together. Now it is actively adding to the problems by pushing ahead with initiatives like these planning applications without consideration of the wider public interest or how it could support the local community.

I am in favour of National Parks because of the power of the concept. People understand that National Parks should be different, that they are areas where the natural environment should come first but also areas which people should be supported to enjoy. Sadly, the LLTNPA, Scotland's first National Park, has consistently failed to deliver those ideals. That doesn't mean National Parks are bad, but it does mean that it's time for an independent review that looks at the many failings of the LLTNPA and how these should be put right.

If you want to comment on the applications you can do so [here](#) for Inveruglas and [here](#) for Tarbet. If you do so, you could include the following points:

- that it is very wrong for the LLTNPA to be proceeding with these applications without a wider plan for the area (this is technically not a valid reason for objecting to the application but is a point that needs to be made);
- that the LLTNPA should explain the proposed charging regime and produce a full assessment of the implications BEFORE the applications are considered further;
- that because of their significant implications and the conflict of interest, with the LLTNPA effectively deciding its own planning applications, both should be decided by the full Planning Committee rather than by officers.

*NB the statutory consultation period ends on 11th March but the LLTNPA usually accepts objections up to the point the Planning Report has been finalised.*

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. LLTNPA
2. visitor management

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