

The LLTNPA's war on camping and discrimination against ordinary people continues

## **Description**

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# Booking opens for campers at park sites

CAMPERS will soon be able to plan their trips to Loch Lomond & The Trossachs National Park, with booking for park authority sites set to reopen from next week.

Camping has become an increasingly popular way to enjoy the park and with staycations likely to be popular again in 2022, staff are preparing for a busy visitor season ahead.

Camping management by-laws cover popular loch shore areas of the National Park from March 1 to September 30 every year.

In these areas campers can choose between staying at one of the National Park Authority's campsites, booking a permit for one of the seasonal loch shore permit areas or at one of many private campsites around the park.

Bookings open on Tuesday for anyone looking to stay at the camping permit areas during the spring and summer months.

Due to the damage

caused by Storm Arwen, Forestry and Land Scotland has advised that the Three Lochs Forest Drive will remain closed until April 1 to carry out felling operations and ensure sites are safe.

Camping permit areas on the drive will open on April 1.

For the National Park Authority's campsites at Loch Chon, Loch Achray and Inchcailloch, bookings will open on March 18, prior to the sites opening on April 1.

Campsites and permit areas have seen a significant increase in the visitors since 2017, with the number of campers using permit areas more than doubling in that time from 15,000 to 34,500.

Kenny Auld, head of visitor services at Loch Lomond & The Trossachs National Park Authority, said: "Camping is a great way to enjoy the National Park and our campsites and permit areas are incredibly popular, attracting thousands of visitors every year."

Herald 19th June. The article makes no mention of the increase

in camping fees. Did the Herald run out of space or did the LLTNPA cut this information from the information it sent to the media?

On Friday the Loch Lomond and Trossachs National Park Authority (LLTNPA) announced a swingeing increase ([see here](#)) in the fees it charges campers: from £3 to £4 or 33% per night for anyone wanting to camp in a permit area – places without any facilities – in one of the camping management zones; and from £7 to £9 or 28.5% for people wanting to use one of the LLTNPA’s basic campsites. The rest of the news release appears designed to make it look as though more people are enjoying the ability to camp in the National Park than ever before whereas in fact, as this post will explain, the opposite has happened.

## **The LLTNPA’s camping charges – a discriminatory tax on the poor**

The formal Review of the Camping Byelaws that the LLTNPA submitted late to Scottish Ministers in March 2020 ([see here](#)) found that “approximately 60% of bookings coming from 50% of the most deprived areas in Scotland.” That was not a surprise. It is likely that the majority of campers booking permits from the less deprived areas were also people with lower incomes. This is the very section of the population whose incomes have suffered most in the pandemic and whose disposable income is now being hammered further by the hike in fuel costs. With half the population of Scotland facing financial meltdown and unlikely to be able to enjoy a holiday abroad this year, the LLTNPA news release describes the 30% increase in charges as “*a moderate increase in fees*”.

The original charges were decided by the LLTNPA Board at its meeting in December 2016 in the “Your Park – Delivery Report” ([see here](#)):

*5.4. While charging for campsite pitches will enable some cost recovery for the costs of running sites (staffing, maintain facilities, online booking system) pricing needs to ensure that sites are accessible be used from people of all backgrounds and incomes.*

So, how does increasing camping charges by a third at this time contribute to that objective?

The camping charges, however, were discriminatory from the start. This was because they were designed not just to cover the administrative costs of processing a permit but the “the service provided by the Park to keep locations in good condition” and, on top of that, the costs of enforcement:

*“5.12. In order to recover some of the costs of running the permit scheme (including the booking system, maintaining and patrolling to ensure these sites are used responsibly and that byelaws are complied with) officers recommend a permit charge of £3 (inc. VAT) per tent/motorhome per night.”*

No day visitor or person staying in tourist accommodation in the National Park is expected to pay anything towards the cost of mitigating of litter picks or of the Ranger Service, despite most of the greatest visitor management impacts occurring outside of camping permit areas. In effect, the permit charges are a visitor tax that only applies to campers, few of whom are likely to be able to afford a night at Cameron House, for example, where overnight charges for two range from £295 to £700+ per night.

At their December meeting the LLTNPA Board reviewed visitor management in 2020 ([see here](#)):

*“Much of what has been achieved this year in terms of additional boots on the ground and temporary facilities was only made possible due to the additional Covid19-related funding available within the National Park Authority budget. In order to sustain this level of service and operation, a similar budget settlement is required, supported by national funding such as Better Places, Green Recovery or equivalent.”*

Although it's not yet public and still subject to final negotiations, it appears that the Scottish Government has now decided to turn off tap for most of these funding streams (for example NatureScot's Green Recovery Fund). This means that either investment will stop, with predictable disastrous consequences given that the high demand for staycations is likely to continue, or Public Authorities have to try and find the money from elsewhere. It appears that the LLTNPA has chosen to meet some of the gap by extracting money from those least able to pay.

As I have argued before, a tourist tax ([see here](#)) related to the costs people were paying for accommodation would be a far more equitable way to plug any resource gap.

## **How was the decision made?**

The “Your Park Delivery Report approved by the LLTNPA Board in December 2016 stated:

*“5.13.6. Campsite and Permit Area pricing will form part of the annual review that the National Park Authority will undertake in the autumn of 2017 and subsequent years. Any potential adjustments would be brought to the National Park Board for approval”*

The LLTNPA Board has conducted annual reviews of the camping byelaws and visitor management ever since but never once considered increasing charges. One of the reasons the Review of the Camping bye-laws submitted to Scottish Ministers was so flawed is it failed to include any cost-benefit analysis of the camping byelaws. The Visitor Management Review for 2020 approved by the Board in December gave no indication that charges might need to be increased or that staff would be given delegated authority to take decisions about this but that hasn't prevented staff taking the decision into their own hands.

In other public authorities decisions to raise charges like this would be subject to decision by their Boards and as a result would be open to some public scrutiny. That, however, is not the way the Chief Executive of the LLTNPA and his senior staff team, who have completely ignored the commitment to an annual review of charges for the last five years, operate. The Chief Executive, Gordon Watson, controls the LLTNPA Board in a way that would still be unthinkable in many other public authorities. It

will be interesting to see whether he asks his Board for retrospective approval in the paper “Joint Response Visitor Management Plan” which is due to be considered by the LLTNPA next month.

The Camping Development Framework, 2019-23 ([see here](#)), as approved by the LLTNPA Board, provided a slightly different explanation of the charges:

*“Camping permit areas have no formal facilities but have basic onsite signage to delineate the area. Some of these permit areas may have services available close by. In return for a small administrative fee, a camping permit provides a temporary exemption from the byelaws allowing informal camping for people looking for a wilder experience in popular parts of the National Park.”*

Clearly, administrative costs have not increased by 30% . Indeed, the LLTNPA has hinted the costs are minimal: “the online booking system simplifies the process of obtaining a permit and reduces the need for National Park Authority staff to administer bookings and payments manually.” The Camping Development Framework goes on to comment:

*“Affordability, although subjective, is also a factor when it comes to accessibility. When designing the permit system and the campsites at Loch Chon and Loch Achray the cost of camping was carefully considered so as not to be prohibitive, with charges for tent and motorhome permits set at £3 per night, and National Park campsites at £7 per person per night, with under 16s going free”*

Subjectively, it appears, Mr Watson and his senior management team have decided that the increase in charges, which will affect one of those least able to pay, doesn't matter. Effectively the Chief Executive of the LLTNPA appears to have been allowed to take a political decision that will make inequality worse.

## Supply and demand for camping

In the Ministerial Letter to the LLTNPA dated 26th January 2016 Aileen McLeod said:

*“I welcome the Park's assurances on the provision of an initial 300 camping places by this date and the addition of more provision in subsequent years which forms part of the Park's Camping Development Plan.”*

The LLTNPA never delivered on that (see [here](#) and [here](#) for example) but decided in their Camping Development Framework 2019-23 ([see here](#)):

*“to shift its primary focus from the creation of new infrastructure to refining what has been developed and working with others to identify appropriate opportunities to increase and improve camping provision and associated facilities”.*

The shift hasn't delivered any new affordably private camping infrastructure either and the result was that when Covid lockdown was released in 2020 and again in 2021 the LLTNPA had far too few camping places to meet demand.

The claim in the LLTNPA news release that “Camping has become an increasingly popular way to enjoy the National Park”

is an attempt to gloss this failure and re-write history. The fact is that prior to the camping byelaws up to 1000 tents had been recorded around the main lochs in the National Park on popular weekend. Now, the LLTNPA allows for something like 300, many of which are located in places totally unsuited for camping ([see here](#)). It is not surprising therefore that with people forced to holiday in Scotland and nearer at home, bookings for the permit areas and National Park operated campsites have increased considerably in the last two years. Demand way outstrips supply and many people who would like to camp in the National Park can no longer do so, with the inevitable displacement elsewhere. The Chief Executive of the LLTNPA knows that with the supply shortage he now has the public over the barrel and can increase charges without affecting demand.

The LLTNPA has for the last six year counted the provision in the campsites it manages towards the 300 places that were supposed to be in place before the camping byelaws came into effect. While the camping byelaws come into force again on 1st March, the news release states that bookings for the National Park Authority's campsites at [Loch Chon](#), [Loch Achray](#) and [Inchcailloch](#), "will open on 18th March, prior to the sites opening on 1st April". If you discount Inchcailloch, which is not within a camping management zone, that is 27 places at Loch Chon and 17 at Loch Achray which will not be open for the starting of the "camping season". On top of this *"Due to the damage caused by Storm Arwen, Forestry and Land Scotland have advised that the Three Lochs Forest Drive will remain closed until 1st April in order to carry out felling operations and ensure sites are safe. Camping permit areas on the Drive will open on 1st April."*

Where camping places are unavailable, it should be the job of the LLTNPA to offer alternatives – but that they never do – accentuating the shortages and lack of choice. These problems never occurred prior to the adoption of the camping byelaws: if somewhere people wanted to camp was flooded or unsafe because of storm damage, they could simply choose to go elsewhere. The beauty of access rights is that they are flexible and allow people to react to circumstances: the ugliness of the camping byelaws is they replaced rights by a bureaucracy that hasn't worked.

The LLTNPA's restrictions on where people can camp has also had a disproportionate effect on people who are reliant on public transport, i.e. generally those with less income. Neither the Loch Achray nor the Loch Chon campsites are served by public transport and both are therefore inaccessible to a large proportion of the population in the Glasgow conurbation. Meantime camping along the A82 and A83 corridors, which are accessible by both train and coach, has been highly restricted.

## **The decision in context**

The sorry story of the camping byelaws is part of a much wider failure in which the LLTNPA, which was set up primarily to promote public enjoyment of the countryside, now does the opposite and is managed to promote the interests of landowners and big businesses.

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. access rights

2. camping
3. Governance
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5. Scottish Government

**Date Created**

February 20, 2022

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