**LLTNP response of 2/7/15 to my complaint about the provision of camping places under the Five Lochs Visitor Management Plan at Loch Venachar and Glen Oglehead**

The LLTNP’s response to my letter of complaint to their convener Linda McKay dated 10/06/15 is contained in FOI 2015/26, FOI 2015/26 review and Comp 2015/045 response (to which Ministers were copied in).

The LLTNP treated this complaint about the implementation of the Five Lochs Visitor Management Plan as a stage 2 complaint. These are supposed to involve investigations according to the LLTNP complaints procedure. Initially the LLTNP dealt with my complaints – still unresolved and which I have submitted to Ministers – as Stage 1 complaints which gave me a right of review and investigation. A side effect of dealing with my complaint of 10/06/15 as a Stage 2 complaint I have no further rights under their complaints process and although the LLTNP has advised me of a right to take my complaint to the Scottish Public Service Ombudsman, since my complaint does not involve “personal damage” or “personal harm” it is outwith the remit of the SPSO. The LLTNP are therefore now in effect operating a one stage complaint process: I do not think this is right but it means my only option is to bring the issues I have complained about to Ministers attention.

I believe the FOIs and complaint response, although very difficult to follow due to the cross-referencing between the documents, show there has been no proper investigation or response to the issues I have raised. I think this is best demonstrated by a timeline for the North Loch Venachar proposed campsite based on information extracted from these documents and my letter of complaint:

2012 Five Lochs Visitor Management Plan published

2013-14 New campsite north Loch Venachar due to be delivered; budget available but proposal delayed due to delays delivering Loch Lubnaig campsite

2014-15 Again budget said to be available north Loch Venachar (FOI 2015/026) but **this is contradicted** by minutes of Five Lochs Visitor Management Stakeholder Group of 1/4/15 right at the beginning of the financial year (provided as appendix C to FOI 2015/026) which indicates that the north Loch Venachar development is now likely to be in 2015-16.

October 2015 Launch of Your Park consultation on new camping bye laws and camping places. There is no no mention that LLTNP owned land which had been identified for campsites in the Five Lochs Management Plan at both north Loch Venachar (within the proposed management zone and a priority area) and Glenoglehead (outwith the proposed zones)

3/12/14 At a poorly attended Visitor Management Stakeholder Meeting (Appendix D to FOI 2015/026) Bridget Jones, the member of staffing who was chairing meeting, said in response to a question that camping provision at north Loch Venachar was “no longer part of any plans”.

2/7/15 FOI Review 2015/026 Response LLTNP states that “the Park authority has not shelved any camping developments”; that Glenoglehead remains a potential development and “the Loch Venachar campsite has not been abandoned”. In explanation of this it stated the then Chief Executive on the advice of staff had decided to look at alternative sites around Loch Venachar due to concerns about the suitability of the site: the one concern mentioned in the FOI was potential impact on ancient woodland. The letter states a decision will be made once the Minister has made a decision on the bye laws.

My concerns about this are as follows:

* The LLTNP has failed to explain why the members of its stakeholder group, which included Board Members, were clearly told the north Loch Venachar was **not going ahead** in December 2014 if in fact the only decision had been to look at alternative sites. There has been no investigation about this (as is supposed to happen with Stage 2 complaints) or explanation as to how this has happened.
* The fact that there was no mention of the north Loch Venachar site in the Your Park consultation suggests that staff had taken a decision – after all, if the National Park had a site, why not take the opportunity to consult widely on it instead of giving the impression there was a shortage of sites in the National Park? However, as a result of my letter to Linda McKay they realised that would be an outcry if this became known to the wider public so have simply reversed their previous decision.
* The lack of progress on these sites and the way decisions have been taken or reversed on the whim of staff demonstrate a complete lack of governance in respect of investment decisions. Such decisions need to be taken openly and transparently and with the proper involvement of the Board. That they are not, raises questions about how local interests, including local Board Members have been influencing the decision making progress.
* The LLTNP’s claims in their correspondence that they had already answered many of these questions, particularly in relation to east Loch Lomond, where there is a very different stakeholder group (no board members) is just wrong. To give one illustration, in February this year (FOI 2015/002) I was provided with a copy of the east Loch Lomond Visitor Management Plan 2014-15 and copies of minutes from 2013 which had asked members of the Stakeholder Group for final comments on the Visitor Management Plan. Yet when I then asked who had approved the VMP and when I was told (FOI 2015/009) it was NOT YET approved and was due to be approved by the stakeholder group in March 2015. (I can provide the documentation relating to this if required).

Nick Kempe 1/10/15