

Appendix 2 - Verbatim comments on the Visitor Experience Guidance and Responses

Scottish Natural Heritage (SNH) (712)

We welcome the Visitor Experience Policies in the Proposed LDP, particularly VE2 'Safeguarding of Existing Sites' and your comments on p15 of the Draft Visitor Experience Planning Guidance that you are supportive of more camping etc in the Park. We fully support your desire to deal with the problems associated with roadside camping and on loch shores. However, in our view the draft Draft Visitor Experience Planning Guidance has missed an opportunity to encourage informal campsites as envisaged in the Your Park consultation document. This could have been done by illustrating where these informal campsites might be located, or by otherwise encouraging informal camping developments, particularly in areas within the camping management zones, loch shores etc. Whilst the Draft Visitor Experience Planning Guidance Section 6 (p11) does support informal camping through section b) small scale development in the countryside, it fails to identify any areas in the west or east of Loch Lomond which are key areas for camping provision identified in York Park. Also d) to g) supports small scale developments but doesn't explicitly state that these are informal camping provision.

Response: *Support welcomed. The role of the planning guidance is to support the spatial and locational policies contained in the Local Development Plan. At the time of preparing the Local Development Plan camping provision was being looked at strategically across the whole of the National Park as an action arising from the 2012-2017 National Park Partnership Plan, (the Your Park project and programme of work). The Local Development Plan identifies sites for visitor experience accommodation and includes policies which support new camp sites. The [camping development strategy](#) was approved by the National Park Authority Board in Oct 2016 following the publication of the draft Visitor Experience guidance. Section 4 of the camping development strategy identifies the locations regarded as priorities for visitor management and capital investment. Therefore, the finalised Visitor Experience guidance has been modified to reflect the up-to-date position in relation to Your Park where appropriate. The definitions in relation to small scale and camping have been amended. It is recognised that West and the upper part East Loch Lomond are not within the area highlighted for small-scale tourism opportunities, however part (g) of the policy supports small-scale development that delivers a visitor management strategy identified in the Park Partnership Plan. Your Park and associated strategies would therefore be supported in principle under part (g) of the policy.*

Scottish Enterprise (681)

Scottish Enterprise (SE) is wholly supportive of the Park's suggested way forward regarding the visitor experience development opportunities highlighted. SE supports the suggested improvements and commercial development parameters that have been included within the 'Visitor Experience Planning Guidance document

Response: *Noted and support welcomed, no modification proposed.*

Nick Kempe (662)

The draft Development Plan was approved by the LLTNP Board on 27th April at the same meeting as the Your Park recommendations which included a proposal that the National Park should produce a Camping Development Plan. The latter has been generally welcomed in principle although there are serious concerns about the number of places being proposed,

their location and their design. The lack of clarity about this is reflected in the Development Plan which has sections on camping but apart from a reference to the Your Park proposals on P15 of the Visitor Experience paper appears to have been developed in isolation from the Your Park proposals. There is an urgent for LLTNP to join up the two.

1) Terminology

While the two documents both refer to “formal campsites” they use significantly terminology to describe other camping provision, particularly in respect of the new types of camping provision proposed in Your Park. The Your Park recommendations paper referred to low cost campsites with “basic” facilities (para 5.4) and that camping would be allowed under permit in places with “limited” or no facilities. It did not define what “basic” and “limited” facilities were or the differences between them. The lack of clarity is increased further on (Para 5.11) where the recommendations states “The development of basic low cost campsites will provide opportunities for visitors looking for a slightly more managed facility” but goes on to say the National Park “will also develop a small number of seasonal sites of similar style to those at Salloch and Inchcailloch”. It is unclear if Salloch is regarded as a “basic” campsite or not. The Draft Development Plan, in its draft Visitor Experience Planning Guidance (P16) categorises campsites as formal, semiformal and informal. Informal sites are described as temporary, seasonal, having no lighting, water or drainage but they may have temporary or composting toilets while semi informal sites are described as the same as informal ones except they may have low level lighting. How this categorisation relates to the description of basic and limited facilities in the Your Park recommendations paper is totally unclear and in planning terms it seems that there will be NO water provided at informal or semiformal campsites which did not appear to be the intention of the Your Park paper which allowed for a range of facilities.

2) Visitor Experience Planning Guidance – caravan sites

The Guidance refers to existing static caravan sites (P9) but makes no reference to the fact some of these still have a small number of places for touring caravans, an example being the site at the SE corner of Loch Earn. This section states the National Park will not allow existing static caravan sites to convert to residential accommodation, saying it wishes to retain places, but makes no reference to maintaining or creating more places for touring vans and tents in these caravan parks.

This is likely to result in further loss of touring places and therefore I wish to object.

While I support the commitment of the National Park not to allow static caravans to change and no mention this. Want retain existing caravan parks P9 says some caravan parks in too remote locations for residential housing – really?

3) Visitor Experience Planning Guidance - Locations of new campsites.

The Guidance on Visitor Experience states “We are likely to support tourism development within towns, villages and land allocated for tourism” and “We are likely to support small scale tourism development with good access to the existing network of paths, infrastructure or visitor facilities the red shaded areas on maps” (P11). It goes on to state “an informal touring caravan or campsite would be likely to be considered small scale” (P12). Apart from an area around Glenbranter and between Crianlarich and Tyndrum all the red shaded areas are on the east side of the National Park and while covering the Trossachs lochs do NOT cover west Loch Lomond, east Loch Lomond or Loch Long. So, what this means in terms of the Local Development Plan as worded is the LLTNP is NOT supporting new “informal” campsites in the west side of the National Park. This is totally wrong and I wish to object. The National Park Authority needs to allow small scale sites in the west of the National Park area. It is not clear how this position fits with the statement that follows (P15): “THE NPPP is particularly supportive of camping provision in East and West Loch Lomond and the Trossachs”. In view of the statements on P11-12 it appears this only refers to “formal” campsites but this is unclear. That this is so is suggested by the statement that “This would

need to be in the right locations with appropriate access, parking and no adverse environmental impacts including visual and landscape impacts”.

I therefore object to the Development Plan unless it is made very clear that the support for additional campsites throughout the National Park refers to all types of campsite, formal, semi-formal or informal.

“There is growing demand for camping and overnight motorhome provision in the Park and we consider that camping and caravan sites provides valuable inexpensive holiday accommodation in the Park” P15

The end of Page 15 refers the reader to the Design Guidance document “for more information on the siting of campsites” but that contains NO information on the siting of campsites, only campsite design.

I object to the Development Plan as it fails to give sufficient guidance on siting of campsites, whether formal, semi-formal or informal. The guidance on siting should encourage provision of campsites around settlements which are popular tourist destinations.

4) Visitor Experience Planning Guidance - Toilets

Toilets are covered in the Guidance on the Visitor Experience, Page 21, in a short section on toilets and parking. No assessment or reference is given on the demand for public toilets in the National Park or the issues that arise as a consequence despite this being the number one concern in visitor surveys. The statement supports developments in what it calls settlements and key recreational sites. It is unclear whether popular sites for camping at present are regarded as key recreational sites or not and the absence of maps for areas outwith settlements does not help with this. It is therefore unclear if the National Park still supports the development of toilet provision which was set out in its own 5 Lochs Management Plan. There is no mention of the planning framework or what the National Park’s policy is in respect of temporary toilet provision to meet peak demand – in contrast to camping where P15 usefully sets out the legal framework for camp and caravan sites.

I wish to object to this section as being totally inadequate and failing to reference the Park’s own Five Lochs Management Plan which included several proposals to include toilet facilities at specific sites.

5) Planning Conditions.

The Visitor Experience Guidance Page P26 give examples planning conditions to accompany planning permission. These include conditions specifying the maximum places for tents, caravans, yurt and that pods and requirements that places will not be changed from say camping to caravans. The restriction on change of type of place is to be welcomed as it could help stop the loss of camping places in the National Park.

Also included in the conditions is a requirement that seasonal/informal camping sites can only be used 1 March to 31st October and for a maximum stay of four weeks. No rationale is given for the seasonal restriction and it makes no sense in terms of the Park’s other objectives. While numbers are much lower, there are people who want to camp over the winter and keeping facilities such as toilets open will help reduce the type of impact the

National Park raised such a fuss about in the Your Park consultation. Its unclear from the letter to Ministers accompanying the Your Park Proposals whether the LLTNP has decided that ALL the new camping places it is proposing should be seasonal and whether the Development Plan is also saying this.

I therefore wish to object to proposal from the Park for seasonal restrictions to be applied to informal camping sites.

Response: *See response above to SNH comments re terminology and location of new campsites. The section on caravan sites has been amended to address the comments raised. No change is considered necessary in relation to the section on toilets and parking. The planning condition Appendix has been removed to address the comments raised. See committee report for further information.*

Helen Todd – Ramblers Scotland (701)

Ramblers Scotland welcomes the opportunity to comment on the proposed Local Development Plan.

We have confined our comments to one specific aspect of the plan, that is the Visitor Experience Planning Guidance (VEP) and its policy on campsite development, with reference to the Your Park proposals for a camping development plan to guide the creation of new camping facilities in the park. We acknowledge that the local development plan process has been ongoing for a period of time, while the camping development plan referred to in the Your Park proposals may be being prepared by another team. However, there appears to be a lack of connection between the VEP and the Your Park proposals, and therefore we are objecting to the proposed local development plan on the following grounds.

The terms used to define the different types of campsites to be considered within the VEP do not appear to be the same as those in the Your Park recommendations. For example, the VEP refers to formal, semi-formal and informal sites, while the Your Park proposals refer to basic informal campsites based on permits, and informal sites such as Sallochty which has water, toilets, litter bins and parking facilities. The Sallochty-style campsite would not appear to fit with the informal or semi-formal definitions within the VEP given that semi-formal campsites as described do not necessarily have permanent toilet facilities or water. We therefore would like to see the VEP and camping development plan developed in tandem with clear links between the two processes. In addition, in the VEP, one of the planning conditions states that campsites would only be able to operate between 1 March and 31 October, which we find surprising. If there is demand for camping, we would anticipate that campsite operators may wish to have the option of being open all year round. For example, we note that many campsites in the Lake District, including two of the campsites operated by the National Trust, are open all year.

Response: *See response above to SNH comments re terminology.*