

Park Authority applies for planning permission from itself for unwanted campsite at Loch Chon

Description

On 27th May the Loch Lomond and Trossachs Park Authority advertised a planning application to create a new 30 place campsite at Loch Chon. You can find all the papers through the Park planning portal <http://eplanning.lochlomond-trossachs.org/OnlinePlanning/applicationDetails.do?activeTab=dates&keyVal=O79O0SSIJ6T00>.

It is bizarre that the LLTNPA is applying to itself for planning permission when the land is owned by Forestry Commission Scotland. In their response to the Your Park consultation the FCS stated it would support new campsites but had no money to pay for them. Leaving aside the fact that FCS appears to have plenty of money to lavish on private landowners, rather than the public (it paid John Grant £7.4m to purchase Rothiemurchus), it now appears that FCS are basically taking nothing to do with campsite provision and are leaving LLTNPA to do everything. This is totally wrong. FCS are a public body with a recreational remit and should be serving the public. Instead the FCS seem to have the Park wrapped round their little finger and, now they are no longer able to introduce their own camping byelaws, using the LLTNPA to do this for them as at Forest Drive by the Duke's Pass

The Planning application contains no justification for this campsite. I had previously asked the Park for all information they held about why they had decided to construct a campsite here and they have refused it (and that case is now with the Freedom of Information Commissioner) The background was given in a previous post <https://parkswatchscotland.co.uk/2016/03/27/con-loch-chon-proposed-trossachs-west-camping-management-zone/> which showed there is no demand for a campsite of this size in this area and called on the LLTNPA to publicly justify their plans.

Objection from Local Residents

A similar point has been made in a [objection from two local residents](#) who have questioned the size of the campsite and the proposals for managing it (there are now three objections from residents on the planning portal). Put simply, the proposed campsite will either be a white elephant and not used or, if used, will have attracted far more people into the area without any plans for how this influx will be managed. While I am against the NIMBYISM which is so evident among some people who are fortunate enough to live in the National Park, I thought this letter and the other letters of objection lodged on the Park's planning portal have made some excellent points:

- The residents question the proposal to use old shipping containers for the toilets, store and equipment room. The Park says the containers will be plated with aluminium and painted – their illustration shows trees painted on the sides. I think the residents are right, these will look dreadful from the start. At present there is a glut of old shipping containers across the world and they are now being used to provide housing in places like Africa. So, they are cheap. While I am sure the Park will justify their use as their contribution to recycling what about supporting the local wood products industry and constructing toilet blocks which are in keeping with the National Park?



The forest plantation on the southside of Loch Chon which was being harvested earlier this year. Neither FCS nor LLTNPA have given any consideration to using this wood to construct toilets at the proposed campsite.

Is it really so hard to construct buildings out of locally sourced natural materials and help sustain local employment? If the LLTNPA really does want to make a contribution to world recycling, it could use these containers as temporary toilet blocks, like portaloos, and install them in the places most popular for camping over the summer.

- How is the Park going to hire out firepits when there is no warden on site? To which I would add, why cannot this Park Authority provide anything for free? If fires are such a problem as claimed by LLTNPA, surely every camping place should have a fire pit? But then, given the lack of

demand for camping here, this would be throwing more good money after bad.

- Why is the Park wanting to install gates? An excellent question. A reader of parkswatchscotland recently pointed out to me that the gates that had been installed at Loch Chon made it very difficult for canoeists to access the loch. Throughout the National Park the LLTNPA, which has a statutory duty to promote access, has been busy installing gates at car parks, the only purpose of which can be to stop access. This NIMBY culture in the LLTNPA affects the rights of local people as much as visitors.

Other reasons why the application should be rejected

The Park is proposing to provide some of the 30 proposed places – its unclear how many – on wooden platforms. Now, I don't think any camper in their right mind would want to camp on a wooden platform (I know it happens on sand dunes in Australia) and this illustrates two serious issues. The LLTNPA has simply failed to consult with campers about fire pits, places or anything else. Either none of its staff have ever gone camping or more likely senior management in the Park have simply failed to consult their staff who do camp and could tell them what makes a good camping place. The second issue is that there is simply not enough ground in the area the Park has identified for a campsite to support 30 camping places.



The path that goes through the proposed camping area. As the site plan states, much of the area is too boggy or steep to provide good places to camp but the Park wishes to fit 30 tents in a place

that could sustain a third of that number. The only reason for doing this is so it can say its delivered some new camping places.



The area to the east of the current carpark is unattractive for camping and, while its been left out of the plans, similar areas have been included.

At present, the area around the lochshore close to the proposed campsite is the most popular for camping around Loch Chon, although people do use several other places (often to fish). However, the Park wants to stop all this and herd people onto an area of slightly higher ground above the loch. One reason there are not more people camping at Loch Chon at present is simply that the number of good places to camp is limited. Creating camping platforms is not going to change this.

The design of the campsite is shown in the [.Loch Chon 2016_0151_DET-Engineering_Layout-100262476](#) and there is an accompanying design statement produced by the consultants [Loch Chon 2016_0151_DET-Loch_Chon_Design_Statement-100262485](#)



The best places to camp, by the loch shore, are NOT included in the campsite area

The Design Statement states that there are no camping places by the shore as “this will minimise visual impact on visual receptors such as canoeists on Loch Chon”. It's great to know the views of canoeists are so important but I am sure neither the consultants or the LLTNPA bothered to consult the Scottish Canoe Association. The SCA strongly opposed to the byelaws precisely because their members need and like to camp on the loch shores. The statement is doubly ironic given that canoeists have been prevented from accessing Loch Chon by the gating of access tracks which prevent anyone getting the vehicles or trailers that carry their canoes close to the water.

The Design Statement claims that “camping pitch locations.....will allow for a range of experiences loch-side, burnside, high level”. Ignoring the fact there are no lochside places planned, this is patronising drivel but it illustrates the mindset of the LLTNPA. You need to remember the Park is intending to try and force people to book places: “I am sorry Mr Kempe but the burn-side places are not available tomorrow but we suggest that if we allocate you a high level place that might expand your horizons”. Petty bureaucracy to replace access rights. I really don't believe this is coming from frontline staff.

The Design Statement describes the Loch Chon con as a semi-formal campsite. One of my objections to Park's Development Plan was it used totally different terminology to the Your Park Plan which produced the byelaws [Response – Development Plan and Camping](#). A case of two parts of the LLTNPA bureaucracy failing to talk to each other. Your Park used the terms “basic” and “limited” facilities, while the Development Plan – which is still to go to a Public Local Inquiry – used the terms “formal”, “semi-formal” and “informal” campsites. A semi-formal campsite, according to the draft Development Plan approved by the Board, appeared the same as an informal site except it could have low level lighting. Informal sites were defined as having no water or drainage, while both informal and semi-formal sites could have temporary or composting toilets. From the Design Statement it appears the definition of semi-formal campsites has changed so semi-formal campsites will now include waste water treatment and a water supply while the toilets can be permanent as well as temporary. It is good the LLTNPA has made the definitions clearer, even if it is unclear who authorised this change or if they have replaced the Your Park terms – but then the LLTNPA takes lots of decisions behind closed doors.

The new definition of a semi-formal campsite however has had the consequence that such campsites now require formal planning permission, which in turn means the LLTNPA has to meet not just its own but other public authorities rules. This has created a whole set of new problems. Stirling Council's Flood Officer has even objected formally to the application due to a lack of information on drainage culverts. The risk of flooding may be an additional factor which explains why there are no camping places proposed by the loch shore where most people want to camp. Indeed part of the application includes a proposal by the LLTNPA to operate the Scottish Environmental Protection Agency's flood warning system only for SEPA to point out that their system does not cover the area! To add to the planning shambles, the Stirling Flood Officer has pointed out the road to Loch Chon, the B829, floods

regularly so there would be difficulties evacuating campers.

All of these bureaucratic problems could have been avoided if the LLTNPA simply allowed people to camp as at present under access rights and take their own decisions about where it was sensible to camp. To minimise the impacts of people camping here, the LLTNPA could have recommended to FCS that it should take responsibility for its own property and install couple of composting toilets and some litter bins. FCS could have done this for under £20k instead of the £345k or so the Park has budgeted. I am sure would have been welcomed by local residents. To address the concerns about anti-social behaviour raised by local residents, the LLTNPA should have been talking to Police Scotland about their role and how they could respond. As the letter from two local residents clearly states anti-social behaviour can take place in campsites just like anywhere else. Only good policing will address that.

The amount of money the Park has devoted to the Loch Chon proposal could have been far better spent. According to the Park's end of year budget report to the Board it was aiming to spend £100k by the end of the financial year 2015/16 year on the proposals. I had previously wondered if this money had been spent because there had been no signs of work on the ground. Its now clear now from the papers appended to the planning application it must have been spent on consultancy to produce plans for the campsite and environmental assessments. The environmental assessment took place in January – not a good time for surveying wildlife and not surprisingly came up with a list of common birds. I intend no criticism of the consultants but this was a bureaucratic exercise for what? A poorly designed campsite for which there is no demand and on which it is planned to spend another £245k this financial year.

What the LLTNPA should have been doing, is what it should have been doing across the National Park, and that is to consider what basic facilities would help those exercising access rights (not just campers) to do so responsibly and to do so in consultation with both local communities and recreational bodies. It could even have allowed local communities to make bids to install new camping facilities in their area – I am sure they would have spent the money being wasted on Loch Chon far more effectively.

If you want to comment on or object to this proposal you can do so on the Park's online e-planning facility or send an email to planning@lochlomond-trossachs.org If you are objecting make sure you head whatever you say "Objection". The reference for the application is 2016/0151/DET

Category

1. Loch Lomond and Trossachs

Tags

1. access rights
2. camping
3. Camping bye laws
4. Forestry Commission Scotland
5. LLTNPA
6. visitor management

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