Scottish Government Consultation on Transient Visitor Levy 2019
John Muir Trust Response

Q1. Do you think that the design of a visitor levy should be set out:
a) wholly in a national framework
Please provide a reason (or reasons) for your answer:
There needs to be a national strategy that includes guidance about the process for prioritising spend such that the revenue first addresses any existing pressures on communities and the environment, second addresses any projected pressure, and thirdly contributes to other visitor-related activities.

Q2: Is an overnight stay in commercially let accommodation an appropriate basis for applying a levy on visitors?
Don’t know
Please provide a reason (or reasons) for your answer:
Commercially let accommodation alone is not a sufficient basis. For example, many communities report the impacts from motorhomes / campervans that are parked roadside and not booked onto a recognised site.

Q3: Which of the following activities do you think a visitor levy could be robustly applied to and enforced, and how?
Wild or rough camping, including in motorhomes and camper vans (NB. multiple choice selection)
Please explain how a visitor levy could be applied and enforced on rough camping, including motorhomes and camper vans:
True wild camping (within the definition of the Scottish Outdoor Access Code / Land Reform (Scotland) Act 2003) should not have the levy applied, and this should be carefully distinguished from motorhome / camper vans. Motor-based activities are never “wild camping” in the meaning of SOAC. Possibly number plate recognition could be used, although those creating less impact by using official campervan sites, should not be penalised either by paying multiple times, or dissuaded from using the official sites. Additionally, there use would need to be carefully assessed to ensure impacts were not just moved to another location.

Q19: A list of requirements that local authorities could be expected to meet before being able to introduce a visitor levy is summarised below.
Do you agree or disagree with these options. (please tick the appropriate box)
If you have any other suggestion for requirements then please add these in the box below together with your reasons
Have held a consultation in their local area to gather views from all those who will be affected by the visitor levy
Local consultation is vital. The capacity and voice of smaller communities, including other local stakeholders, that may have less of a voice but be experiencing the greatest impact must be fully integrated into this process. Additionally, full account needs taken in decision making about spend, of the environmental impacts and address these as a top priority as well.

Q22: What requirements might be placed on local authorities to engage with local stakeholders to determine how revenues are spent?
Please provide a reason (or reasons) for your answer:
Local stakeholder engagement is vital, and this must be alongside an objective assessment of existing and projected impacts, and address these through spend as a priority.

Q24: Should revenues from a visitor levy be allocated to priorities articulated through local tourism strategies, where they exist?
Yes
Prioritisation should always be conducted strategically – see Q23. There needs to be an objective assessment of existing and projected visitor impacts on the environment and communities to support local strategies development.
Q25: What reporting arrangements might be required of local authorities to account for the expenditure of receipts from a visitor levy? 

Please provide a reason (or reasons) for your answer: 
Local authorities should report against the targets in the local strategy of prioritising addressing of the existing, then projected impacts. Reports should be used to inform reviews of the national and local strategy.

Q26: If a local authority was to impose a visitor levy on a specific area within the authority, should any revenue raised have to be spent only in that area?

Don’t Know

Please provide a reason (or reasons) for your answer: 
The answer to this question depends on the definition of “area.” There are instances where the greatest spend in a region is not where there is the greatest impacts. For this reason, there is a need for a national strategy underlain by an impact assessment as articulated in Q23. Any localised levy should not be implemented where there are potential negative impacts on other locations, either within or outside the “area,” however defined.

14 November 2019