

The potential impact of Flamingo Land's proposals on the National Park

Description






Aerial view of the proposed development area included in the scoping report from Peter Brett Associates

At the beginning of April, Flamingo Land ([see here for most recent post and links](#)) asked the Loch Lomond and National Park Authority whether an Environment Impact Assessment (EIA) would be needed for its proposed development at Balloch ([see here](#)). The response of the LLTNPA on 13th April ([see here](#)) was that a full EIA will be required:

The development is permanent and will have an impact on a large area (33.5ha) and will have an impact on both visitors to the National Park, residents and businesses. The proposal is complex and large scale. The construction period is likely to be long and any impacts during construction will be prolonged in terms of construction traffic, noise and pollution. The operation of the development also gives rise to potential significant environmental impact in terms of landscape impact, traffic increase and noise nuisance

The response was rapid I believe because the LLTNPA could hardly have said anything else. So, what can the concerned public learn from the 125 pages of report submitted with the request for a screening opinion?

LOCATION	INTRODUCTION	SUBJECT PROPERTY	SUB DIVIDED SITES	LOCH LOMOND SHORES	LOCH LOMOND & THE TROSSACHS	THE OPPORTUNITY FURTHER INFORMATION
SUBJECT PROPERTY <p>West Riverside is a site of circa 44 acres (18 hectares) and is largely public park and woodland, bounded by Loch Lomond Shores to the west, Loch Lomond to the north, the River Laver to the east and Balloch town to the south. West Riverside includes a mixture of stakeholders, namely Scottish Enterprise, Loch Lomond and The Trossachs National Park Authority and West Dunbartonshire Council.</p> <p>West Riverside sub-divides naturally into five smaller separate development sites as highlighted on the plan below. Please note these are indicative only and the land can be sub-divided to meet the needs of the developer.</p> <p>It should be noted that residential development may be permissible if viewed as enabling development for alternative uses on site.</p>						
			PLANNING AND DESIGN <p>Loch Lomond and The Trossachs National Park Authority are the planning authority responsible for West Riverside and any development concepts and plans will require their approval. It should be noted that they are involved in this project and are fully aware of Scottish Enterprise's objectives.</p> <p>Development will also need to consider appropriate design and quality standards given that it is situated within the National Park. These will include:</p> <ul style="list-style-type: none"> • The use of quality materials in-keeping with the wider built and natural environment (i.e. stone, timber, slate etc); • A high level of integration between different uses; • Public realm that invites and encourages footfall between Balloch and Lomond Shores; • Retaining and enhancing public access to the River Laver footpath; • Where possible avoiding the need for gated areas where the public is excluded; • Retention of the former Station buildings opposite Balloch Station; • Retention of the access road and public slipway. 			
						

The most striking thing about this proposed development in our National Park is its size, 33.5 hectares, almost twice the size of the West Riverside Site marketed by Scottish Enterprise (map above). What the top photo illustrates graphically is how Flamingo Land, through its purchase of Woodbank House, has in effect gained control of all the undeveloped land on the north west side of Balloch and its proposed development will effectively surround Loch Lomond shores. Its power will increase further if Scottish Enterprise, as its proposing, eventually sells it the West Riverside Site. Land. In effect the southern gateway to the National Park is being handed over to a private business. There are legitimate questions about whether this is in the public interest and whether, whatever developments might eventually go be agreed by the LLTNPA, the ownership of the West Riverside site should remain in public ownership or, alternatively, be transferred to the local community.



The EIA Report makes a reference to the site as being vacant and derelict – a myth that supporters of the development are using to justify the development – and states that there is a desire across Glasgow Region to treat such land as an investment opportunity. The trouble is the portrayal of the West Riverside site as derelict is not true as the photo above shows. Yes, there are pockets of dereliction and Woodbank House is in a sad state of disrepair. While the West Riverside site may not be the best green space in the world there is far more green than dereliction and, contrary again to claims in the Balloch Charrette, its well used by people. Indeed much of the greenspace is the product of earlier restoration of what was formerly the line of the railway.



There are even pockets of wild along the shores of the River Leven. If this is developed into a constructed river walkway, as the LLTNPA and Scottish Enterprise appears to wish, how will visitors to Balloch be able to access nature? That is after all what the National Park is meant to be about?

The developers will argue that people will still be able to access Balloch Country Park on the other side of the River Leven but this is inaccessible. The EIA makes no mention of the long-wished for pedestrian bridge across the head of the River Leven which would enable people visiting Lomond Shores to access the Country Park. That might offset to some extent the development of this site but the omission of the bridge from the EIA scoping requests indicates Flamingo Land has no intention of paying for this.

The EIA scoping Report is very vague about Flamingo Land's plans which are listed as follows:

3.1.6 Taking account of the above it is likely that the proposed development includes the following elements:

- hotel and holiday lodge accommodation;
- controlled camping areas;
- leisure and recreational facilities;
- education and visitor interpretation facilities;
- hot food café / restaurant uses;
- transport infrastructure;
- public realm enhancements including footpaths and cycleways;
- viewing platform(s);
- appropriate ancillary uses; and
- landscaping and site development infrastructure including flood risk mitigation measures, SUDS measures, water supply and drainage.

However, other parts of the report give an indication of what this includes.



As if the existing Drumkinnon Tower at Loch Lomond shores was not enough, the report includes an outline visual impact assessment of a 100m high viewing tower. It appears that to compensate for the removal of greenspace at Balloch, the idea is visitors should be able to view nature from afar.



You don't need a viewing tower to see Ben Lomond from Balloch but any viewing tower will have a significant impact on the views south from the Loch Lomond National Scenic Area, including from the summit of Ben Lomond. The EIA, though, apparently believes a solution could be found: *"consideration should be given as to how to mitigate expansive southerly views from this popular hillwalking viewpoint"*. A friend suggested it could be very slim and reflect the shape of a Flamingo's neck.

9.5.11 The ZTVs were prepared on the assumption of the inclusion of key structures proposed development i.e.:

- Viewing tower – estimated to be 100m in height;
- Leisure development feature element – estimated to be 50m in height; and
- Leisure building – ridge line estimated to be 20m in height.

There is another apparent give away in the scoping of the Zones of Theoretical Visibility (ZTVs). On the maps that depict what can be seen from where there are three references to a “chute” which occurs nowhere else in the document. Is this why the proposed Leisure Development feature is 50m high? Is this an enormous water slide? It appears the Sunday Herald was fully justified in referring to the proposal as the blingy bling banks of Loch Lomond ([see here](#)). Such evidence as can be gleaned from the EIA documents provides no re-assurance about what Flamingo Land is going to propose but what it is it appears to be an intensive tourist development.

Such development is, I believe, not appropriate for a National Park. National Planning Guidance reinforces this:

Above all, our National Parks are natural, resilient places. We environmental quality, comprising some of the very best of landscapes, to continue to form the foundations of their development.

A good reason, one might have thought, for the LLTNPA to reject the proposal but the EIA provides an indication of why this might not happen:

2.2.9 In reality the EIA process is iterative, and runs in adverse effects are identified, the design of the project proposed. Consultation, a vital component of the EIA and contributes both to the identification of potential

This reads as though the application has already been agreed, its only the fine detail that needs to be sorted out and all can be mitigated. It makes one wonder if the 100m viewing tower and leisure development are being proposed to divert people’s attention from other aspects of the plan, which are fundamentally about development on greenspace at one of the main entry points into the National Park? The scenario is that following the inevitable public stushi on the viewing tower, the LLTNPA rejects that aspect of the proposal and tries to market the “compromise” which follows to the public as somehow meeting the statutory objectives of our National Parks.

The EIA contains a number of proposals for consultation, mainly with statutory bodies – potential for lots of wheeling and dealing behind closed doors – but nothing I could see about engaging with people who care about National Parks in Scotland, including the people who signed the petition against Flamingo Land. So, how about Flamingo Land starting their consultation by asking the public about the viewing tower and leisure chute?

Category

1. Loch Lomond and Trossachs

Tags

1. flamingo land
2. LLTNPA
3. natural environment
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