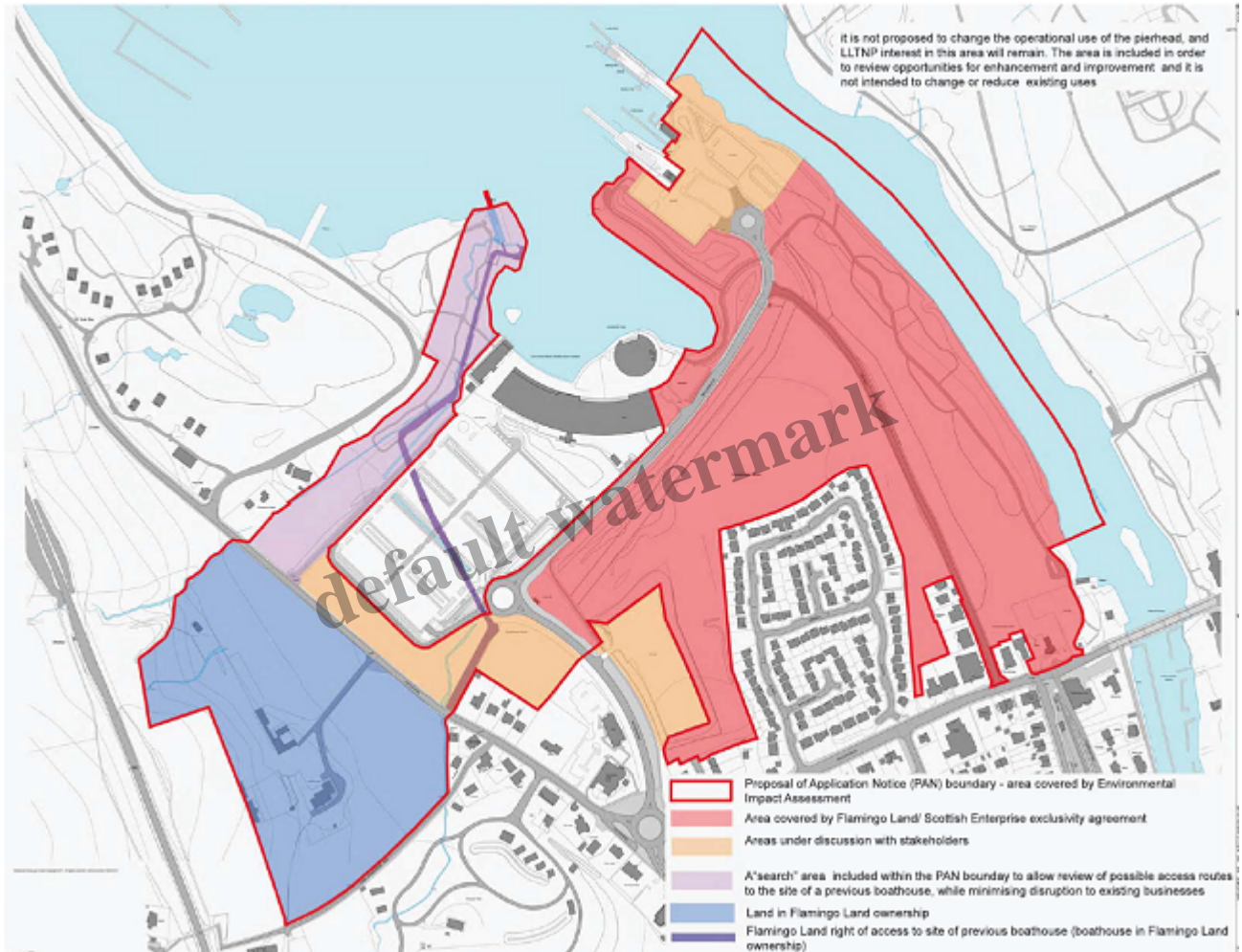


The Flamingo Land consultation, community empowerment and sustainable development

Description



The area of the proposed application (from LLTNPA planning portal). There is nothing in the document about WHAT Flamingo Land are actually proposing

On 27th October, after six months of silence, agents for Flamingo Land lodged a pre-planning application consultation strategy with the Loch Lomond and Trossachs National Park Authority. Anyone who follows Scottish Government planning policy knows that one of the big ideas and big pushes is towards “front loading” the planning system, with a shift to consultation and engagement taking place prior to planning applications being submitted. The idea is this should improve proposals and help create consensus around developments. What front-loading fails to acknowledge is that current planning system is unbalanced, with local communities having little power, and is driven by the self-interest of developers. This, and the pathetic inadequacy of current pre-application consultations are clearly evidenced by the Flamingo Land proposals.

Its still them and us

2.8 How they are to be consulted

2.8.1 Public exhibitions and drop-in sessions will be held at Unit 7, Loch Lomond Shores on the following dates:

- **Friday 17th November** between **1.30pm** and **7.30pm**;
- **Saturday 18th November** between **9.30am** and **1.30pm**; and
- **Monday 4th December** between **1.30pm** and **7.30pm**.

2.8.2 All three public events will be held at Loch Lomond Shores at the following address:

Unit 7, Loch Lomond Shores
Ben Lomond Way
Balloch
West Dunbartonshire
G83 8QL

The “They” is the public, you and me – the heading illustrates typical attitudes of developers towards the public, a hurdle to be got past, not a partner in developments.

The Pre-application consultation is supposed to include the following:

1.1.3 A Proposal of Application Notice (PAN) must include:

- a description of the development;
- a location plan;
- contact details, and
- details of the proposed consultation.

The only description you will find in the planning documentation about Flamingo Land’s proposals is this:

Description of proposal [Note 2]

MAJOR DEVELOPMENT

The erection and operation of a tourism and leisure led
mixed use development with associated infrastructure
on two linked sites, West Riverside & Woodbank House.

The LLTNPA will no doubt be patting itself on the back that Flamingo Land is holding three consultation events, rather than the minimum recommended, which is one! How the public are expected to meaningfully inform the proposals by turning up to an event on the day, with little idea of what to expect, and then respond with no time for reflection, I don't know. Any meaningful consultation has to take place over time, to allow exchange and development of views, but instead of using the last six months to do this, the LLTNPA is allowing Flamingo Land to run three tokenistic events. This is apparently what good consultation looks like – the document states “Best Practice for Consultation is also outlined” – in the planning world. This is a major development proposal in a National Park which has enormous implications both for the local community and the National Park and is quite frankly not good enough.

Its also a recipe for conflict:

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Recommendations: Collaborative inclusion and empowerment

43. There should be a continuing commitment to address community needs to improve significantly.

Front loading engagement remains a valid and attainable goal. Planning authorities and developers need to promote innovation and be involved in planning their own places. Much smarter use of information and social media could support a step change in the transparency of the process.

44. Communities should be empowered to bring forward their own plans which should form part of the development plan.

Communities are best placed to define the future of their places through local plans, or could be driven by land reform or charrettes forming part of the local development plan where it can be developed to meet development requirements. Communities should also go beyond the plan to enable their delivery. Community development trusts, community enterprises and other community-led organisations are playing an increasingly important role in this.

Extract from Empowering Planning to Deliver Great Places. One of the three authors was Petra Biberbach, Chair of the LLTNPA Planning Committee

So, why is Petra Biberbach not using her position as Chair of the LLTNPA Planning Committee to

empower the local community to get actively involved in planning the Riverside and Woodside sites as she recommended two years ago?

Community Empowerment and planning

While Scottish Government pronouncements and the discourse of our public authorities is full of buzz words about “community engagement”, “community empowerment” and “co-production”, the actions of our Public Authorities continually contradict what is being said. The Park of Weir planning decision, where Planning Minister, Kevin Stewart, overruled the views of the local community at Dunblane in favour of the developers is just one example of this.

Its worth reading what the organisation Planning Democracy had to say about the Scottish Government’s planning white paper (which was developed in response to the review of Planning Petra Biberach was involved in):

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PD Recommendations: Measures need to be introduced to increase public voice in planning and which make it easier for people to have more opportunities to participate. There needs to be more powers to ensure people's concerns are heard. The

- the introduction of an Equal Right of Appeal *in* areas contrary to Local Development Plans or where the effect of introducing a credible threat that developments be subject to scrutiny – substantially increasing
- measures to enhance transparency and increase accountability requiring planning meetings to be web cast, publishing Application Consultation reports and developing public consultations.
- prioritisation of resources to explore innovative planning making but also in development management
- Planning Performance regimes need to include measures to increase extent of involvement and the extent to which people are involved in decision-making.

The lack of meaningful involvement however fundamentally comes down to power. What the map above illustrates is that Flamingo Land could be granted a stranglehold over the land to the West of the River Leven and therefore over the local economy. Scottish Enterprise has agreed in principle to sell the Riverside Site, which is currently in public ownership, to Flamingo Land while their purchase of Woodbank House and also the boathouse on the point to the north west of Lomond shores means they surround that development. There are serious issues to be addressed about whether this is in the public or local community interest.

There is, however, now that the Community Empowerment Act is law, an opportunity to challenge this. One way for the local community to prevent Flamingo Land from acquiring too much power would be to request the Riverside site from Scottish Enterprise as an asset transfer. This would not be with a view to stopping all development from going ahead but rather to ensure the community is able to influence the development, retain control in the long-term and ensure some community development. For example, if the local community owned the land they could refuse development in certain places, such as Drumkinnon Wood, prevent inappropriate applications being made in future (e.g viewing towers which I suspect will be the sacrificial lamb Flamingo Land offers up to get their development proposals through) and ensure community benefit through rent payments.

Against what criteria should Flamingo Land's development proposals be judged?

While the planning application still describes the development as Flamingo Land, the developers have set up a website in the name of [Iconic Leisure Developments](#). This is more informative than the planning application and makes clear that fundamental to the application will be an attempt to "drive the number of visitors":

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Our Vision of West Riverside and Drumkinnon Wood

West Riverside is a key site for the future development of Loch Lomond as a high quality and attractive tourist destination.

It is an important 'placemaking opportunity' and our proposals are focussed on :

Delivering a characterful contemporary design which will ensure that the development has a sense of place appropriate to Balloch, Loch Lomond and the National park

Structuring the design around new pedestrian and cycle friendly routes and spaces to link our development, the station and Lomond Shores

Providing a strong landscape framework for all elements of the site
Developing a commercial mix of uses that will animate the site and maximise footfall thereby ensuring development and long term sustainability

Our proposals recognise the key sensitivities of developing in the National Park on a prime wooded and waterfront location but they also recognise the key need for development which has sufficient ambition to transform the present use of the site.

We propose activities and accommodation which will drive the volume of visitors to the site that we consider are required to sustain the high quality facilities that SE and the Park wish to see developed. We understand that this level of ambition will require detailed development discussions and consultation with Planning and the local community. We are keen and committed to carrying this out to realise what will be a series of linked, unique new destinations within Balloch at the Leven and Lomond Shores.

This is worrying. It is exactly the same type of wording which HIE uses at Cairngorm – we all know what happened there – and is, in my view, inappropriate for a National Park.

There is nothing wrong with development at Balloch as long as it is sustainable and benefits both local

people and the wider public. While its a gateway to the National Park, gateways are not normally places people choose to linger. People want to get inside and in the case of National Parks to experience nature. It appears the only way Flamingo Land believe they will be able to attract visitors to remain longer term is if they offer a theme park type development. They may be right about this but it would be totally inappropriate for a National Park. The fundamental problem is that this site is being viewed from a commercial, rather than a National Park, perspective and that is likely to drive a certain type of development. Most of it is still public land and other solutions are possible.

Whatever is proposed should, I believe, be evaluated against the National Park's four statutory objectives. Here are a few pointers of how I think the proposals should be judged:

- Sustainable economic development
 - will the long-term jobs on the site be reasonably paid (talk in Scotland is now of £10 an hour minimum wage) and provide good terms and conditions or will the development provide yet more precarious jobs on the minimum wage with precarious hours?
 - will local community businesses and other organisations be able to operate within the development area on fair terms and conditions?
- Conservation
 - how much of green parts of the Riverside and Woodbank House sites will be retained, will aerial shots of the site look as green in five years time and will Mackinnon Woods be kept free of development?
 - what will the landscape impact of the development be and will there be a viewing tower which could be seen from the summit of Loch Lomond
- Sustainable use of resources
 - Will any polluted land on the site be cleared up?
 - Will the development when operational be powered entirely by renewable energy?
 - Will the development result in more traffic and does it incorporate improved public transport links?
- Public enjoyment
 - Will traditional informal recreational uses of the site be able to continue (boating and angling on river leaving, walking in Mackinnon Woods)
 - Will people visiting site be able to access nature easily, e.g, through a new bridge over the River Leven?
 - Will the amount of good quality public space increase or decrease?

This is far from an exhaustive list and other people will have different ideas. The LLTNPA and Flamingo Land should have been engaging with the local community and nationally about such objectives but they haven't done so so far although they have been clearly having secret talks since January:

The description of the development and the location plan are detailed in the Pre-Review Report submitted to LLTNPA on the 31st January 2017 for comment. This was acknowledged by LLTNPA on the 2nd February. LLTNPA's formal response to questions raised in the PAR Report, including advice on the consultation strategy for the planning application, was received on the 17th February 2017.

The way its going Flamingo Land should provide an ideal opportunity for both local community and national lobbying organisations to demonstrate to the Scottish Parliament the inadequacies of our current planning system within the forthcoming Planning Bill which is intended to create a different approach.

Category

1. Loch Lomond and Trossachs

Tags

1. conservation
2. flamingo land
3. landscape
4. LLTNPA
5. planning
6. Scottish Enterprise
7. secrecy

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