



I left Lomond Shores thinking that the only way the Loch Lomond and Trossachs National Park Authority can only approve the development of this holiday resort if they ignore all four of their statutory objectives, conservation, public enjoyment of the countryside, sustainable economic development and wise use of resources.

## The “consultation”

It is anticipated that an application for Planning Permission in Principle will be submitted. Although, in some cases, it is possible to submit an application for Planning Permission with supporting information, this development’s scale and important location in a National Park means it will be submitted with an Environmental Impact Assessment (EIA), which is currently being prepared. An Environmental Impact Assessment is a means of drawing together, in a systematic way, all the significant environmental effects arising from the proposed development together with the measures to be taken to minimise or eliminate them. This will be publicly available and will include:

- Assessments of the impact of development on views across the landscape (landscape assessments)
- Traffic and transport assessments
- Ecological surveys and reports
- Flood risk, drainage and hydrology assessments
- Reports on ground conditions
- Air quality and noise assessments
- Archeological and heritage assessments
- An assessment of the economic benefits this development will bring to the area

It is important to remember that our design proposals are still at an early stage so our current proposals will not count as formal representations to the Planning Authority. A further opportunity for public consultation on Loch Lomond and the Trossachs National Park will be available as part of the statutory planning consultation process, following formal submission of the planning application in early 2018.

Extract from Flamingo Land/Iconic Developments consultation display

While the detailed design plans for each component of the development may well be at an early stage, Flamingo Land’s statement that it will submit an application for Planning Permission in Principle ([see here](#)) early in 2018 means the main elements of the proposal have already been decided. If an overwhelming majority of consultees object to one or more elements of the proposal, there is no time to develop alternatives. In addition, most parts of the Environmental Impact Assessment must either be well developed or complete by now but all of these have been withheld until the planning application is submitted. So much for the Scottish Government’s commitment to “co-production”. On the one hand they support community planning events, which included the Balloch charrette ([see here](#)) earlier on this year, but at the same time they allow developers and “the market” to carry on as they always have.

Something is very wrong when consultation and involvement for what is an extremely large development in a National Park – and remember the emphasis now is on consultation prior to any planning application being submitted – is limited to a handful of days when the public can view an exhibition and are given the opportunity to comment on this. Those attending were hit with a chocolate box of new proposals from a mono-rail and aerial walkways to outdoor swimming pools and, while given the opportunity to ask questions of the team of consultants present, after this tasting were asked to give an immediate response. While I overheard and took part in a number of very interesting discussions, there was no real opportunity to think or talk through the implications let alone offer alternatives.

There is another, and final, consultation event Monday 4th December but at least the consultation [questionnaire](#) is now online which gives people a little longer to consider how to respond.

## **The main elements to the proposals**

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Extract from map showing proposals for Riverside site

The two key big ideas developed in the Balloch Charrette, for a walkway along the River Leven connecting the town to Lomond Shores (about which I was sceptical) and a bridge across the mouth of the River Leven to connect Lomond Shores with Balloch Country Park (and therefore the countryside) have both been dropped. Both proposals were about improving the public realm but neither would have brought financial benefit to the developer and its almost certain money is behind this raising the legitimate question as to what appointing a private developer will bring to Balloch.

Instead, the proposals appear to about using every available inch of space on the site to make money for Flamingo Land.

### Greenspace

Ecologists and arboriculturists are currently working to determine an approach for development aimed at minimising negative impacts and producing a range of benefits – including enhancement of woodland habitats for



- **Woodland:** appropriate, sustainable development within woodland areas which is dependent on retaining its character and ecology – such as woodland lodges, a conservation and education area for children, a tree top walkway, and adventure rides and activities through the trees.

While Flamingo Land are

be intensively used, as you can see by the number of this number of holiday lodges are needed at Balloch

Drumkinnon Wood

This is very well used by the local community, but the proposal is for it to become one of the gateways

to the development via an aerial walkway (4) which conveniently by-passes Loch Lomond Shores, as well as providing (from a count) 31 holiday lodges, some of which apparently may be up in the trees. Along with this is a Forest Adventure Area” (3) and Children Area’s (5). How this will leave any room for nature in what is an Ancient Woodland Site is not explained.

### The parkland along the River Leven

This is to be filled with another 39 (again my count) Holiday Lodges (that makes 70 Lodges in all) but is also site for a new monorail linking the station to the Flamingo Land visitor hub. This is private transport to take people to a private development, quite a contrast to when the public railway took people to the edge of the loch in Balloch’s heyday. While Flamingo Land are saying that none of the lodges will be fenced off, I think people will be left feeling intensively uncomfortable about intruding on private space if they step off the path which forms part of the John Muir Way. The proposal changes what was a path through parkland into a path through a glamping site giving people every incentive to take the monorail.

### The pierhead



The land at what is described as the pierhead (7 in diagram above), which currently offers the best views over Loch Lomond, is being proposed for intensive development which may be as high as the Drumkinnon Tower. This includes a 60 place luxury hotel and an indoor water sports development.

### Viewing Tower

precedent: viewing tower



For those who who not want to pay for the resort facilities to enjoy the views, the proposal is for a viewing tower behind the development so people can pay to look out over the hotel and watersports facility to see Loch Lomond. This is I believe privatisation of a public good, made even worse because the design of the resort is such that there is nowhere else people can go to enjoy the views and nature. This might have still been possible if a bridge was constructed over the River Leven into Balloch Country Park and if Drumkinnon Woods had been left as a space for informal recreation.

### Transport

While the proposal claims to put walking and cycling at the heart of the development, current roads and parking are basically to remain as they are, except for the Lomond Shores overflow carpark which is to be taken over for people staying in Flamingo Land accommodation despite current shortages. Locals and visitors can therefore expect parking to get worse at peak periods.



The Ben Lomond Way behind the Drumkinnon Tower separating Lomond Shores from Drumkinnon (photo from day of consultation event). The lack of people tells you everything.

There are currently two roads to the the Pierhead area, Ben Lomond Way and Pier Rd. These see little traffic except when people are trying to access the Park operated public boat launching slipway, the only one left on the loch, and a parking area which is distinctively suburban. The roads and carpark segment the site with the result that walking from Lomond Shores to the River Leven is not a good experience. With a bit of radical thinking, consultation with boat users on their needs and alternatives and some expert input there must be opportunities to remove one of the roads and the parking area improved. Instead, the suburban blight is left at the heart of what is supposed to be an iconic development. Another opportunity missed.



## Are there any good elements to the proposals?

I thought there were two elements to the proposals that might enhance the National Park, rather than undermine its core purpose, and both were well away from the loch shores.



Extract from Flamingo Land/Iconic Developments consultation display – Station Square

The charrette identified the space by the bridge over the River Leven as needing improvement and the ideas Flamingo Land has produced appear informed by this (helped I think because there has been some involvement in other stakeholders such as Sustrans in how this part of the site might be developed). Is a big developer needed to do this? It seems to me the sort of proposals being made for this space could, with a little vision from our public authorities, be implemented by a Community Development Trust. This could, for example, provide a bridge between people in the local community and effective use of the proposed outdoor performance space.

## Context



## Concept



limited high quality residential development

open views retained

The other part of the proposal I liked was for the land in front of Woodbank House, basically a public space for people to enjoy themselves without having to spend money. Not a natural landscape but

not incompatible with the objectives of the National Park.

## **How do Flamingo Land's proposals fit with the statutory objections of the National Park?**

### Conservation

The proposals are to jam pack the areas of ancient woodland on the Riverside part of the site with developments so they became a version of Go Ape. That was not appropriate for Pollok Park in Glasgow and is not appropriate for a National Park.

In landscape shores, what can be seen from a sixth storey hotel bedroom, will equally be seen in the opposite direction. Since the 1980s the woodland setting on the west side of the mouth of the River Leven has been progressively destroyed, first with Lomond Shores and now by the Pierhead Proposals. The most intensive part of the development is in the wrong place.

### Public Enjoyment

While the shoreline between Lomond Shores and the Maid of the Loch does not offer a quality experience in terms of the immediate environs, the public have a right to walk along most of shore and enjoy the views. This space, if the proposals go ahead, will effectively be privatised while the ability of local people to enjoy Drumkinnon Woods will be severely compromised.

This is part of a wider process about control of space: the camping byelaws for example, which prevent people from camping where they always have done in direct contact with nature, have been used to channel people to commercial campsites. The commercial success of the proposed camping pods at Flamingo Land will depend on the continued ability and commitment of the LLTNPA to the camping ban.

Moreover, the Park's statutory duty is to promote enjoyment of the special qualities of the Park, not to promote indoor leisure developments or intensively used tree top walkways. I have been to Landmark in Carrbridge a couple of times, and while I have never much wildlife there, at least you get the feeling that you could step outside the centre, away from the crowds and aerial walkways, and see something in the neighbouring woods. At Flamingo Land there is no space left for nature or for people to enjoy it.

### Sustainable Economic Development

Without detailed design plans, its not possible to tell yet whether the development will be sustainable in terms of issues such as use of materials and energy or how many and what type of permanent jobs it will create. One can at this stage question other elements of sustainability. Apart from the claim

that Abellio is interested in improving the train service, all the indications are that the development will increase traffic to an area which already groans under the number of cars. The bigger issue though is about sustainable tourism and why people would wish to stay in a Flamingo Holiday Lodge or hotel at Balloch for a week?

The idea of promoting Balloch as a gateway to the National Park makes sense but people tend not to linger in gateways for long (unless forced to do so, for example by the camping ban) and the pattern of tourism to the countryside is changing to short stays. There is not one element of the proposal that I can see that is about enabling people who book accommodation to travel out to experience and enjoy the National Park. Instead, its about keeping people in the resort and getting them to spend money, not on enjoyment of the natural qualities of the National Park but on amusements. How it contributes to the development of sustainable tourism in the National Park is something therefore the LLTNPA needs to answer.

### Sustainable use of resources

Again, its too early to tell but to me the outdoor swimming pool area, no doubt heated, tells a tale.

### **What needs to happen**

We need to remember that the Riverside element of the proposed development is publicly owned. Our Public Authorities however are so wedded to the tenets of neo-liberalism – that only the private market can and should deliver developments – that they are happy to promote a development which is, judging by how it matches the National Park's statutory objectives, to be in the private not the public interest.

A different approach is possible starting from the idea that publicly owned land should be used to deliver public goods in partnership with local people and other stakeholders to meet the statutory objectives of the National Park. There are two ways this could happen. The first is if the LLTNPA were to start upholding its statutory objectives rather than promoting/acting as a facilitator for inappropriate development. The second would be if the local community were to launch a bid to takeover some or all of the site (just like the Aviemore and Glenmore Community Trust intend to do at Cairngorm). Combine the two and you could develop a much better alternative to Flamingo Land's offering.

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. Camping bye laws
2. conservation
3. flamingo land
4. LLTNPA

5. planning
6. public transport
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