

## Flamingo Land and flooding

### Description



Flooding Old Luss Rd, Friday 9th August 2019. Photo credit Geoff Hull.

After my post on floods and flood prevention within our National Parks ([see here](#)), which included a brief postscript on Balloch in response to a reader's comment, I have been sent more photos of flooding on the Old Luss Rd, which runs under the Woodbank House part of the proposed Flamingo Land development.

The updated Design Statement Flamingo Land submitted with their revised Planning Application in

## 6.3 Infrastructure

### Surface Water Drainage Strategy

The proposed SuDS strategy for the site has been discussed with SEPA and Scottish Water who are supportive of the approach.

**Woodbank;** The proposed development is for less than 50 homes, so it is likely that only one level of SuDS treatment will be required prior to discharge into a receiving watercourse, utilising roadside swales.

**Drumkinnon Wood;** This area of the site will not be accessed by cars, with only occasional access for emergency vehicles. Because of this, SEPA have agreed that surface runoff in this area will not require treatment, however, roof runoff would require one level of treatment utilising infiltration trenches beside proposed lodges.

**Car parking;** A filter drain connected to a SuDS basin will provide two levels of treatment and the attenuation required prior to discharge into the River Leven for the surface water runoff from the proposed car park adjacent to Pier Road. A similar SuDS treatment approach is proposed for the car park at Pierhead.

**Riverfront;** Surface water drainage at the Riverfront area of the site is problematic as this area of the site is very flat. Significant land raising would be required to provide a piped network with an outfall above the flood level. The proposed strategy therefore is for infiltration solutions that manage treatment and attenuation of runoff, thereby avoiding land raising.

An infiltration trench will run along the western edge of proposed access tracks running through the middle of the riverfront area. Each lodge will have with its own catchpit and soakaway system to allow the roof runoff to infiltrate into the ground. This will capture surface runoff and provide treatment to the roof runoff from the lodges west of the track.

### Foul Drainage Strategy

It is proposed that foul drainage will enter the wastewater network connected into Scottish Water's existing combined sewers on Old Luss Road and Pier Road respectively.

A pumping station is proposed in the riverfront section of the site which will capture foul drainage from the Riverfront and Pierhead areas and pump the wastewater to the existing combined sewer network at Balloch Road.

In order to determine whether development proposals can be serviced by the current water supply and sewerage system, a Pre-Development Enquiry has been lodged with Scottish Water, and a response is awaited.

Flamingo

Land's proposal for Woodbank House appears to be that the additional water run-off caused by the development – each time you build a house or a road it removes ground which could absorb rainfall or water draining from higher ground – should be discharged into existing water courses. As the photos show, these clearly do not have capacity to deal with existing water run-off.



Flooded garden old Luss Rd – from a previous episode of flooding. Photo credit Geoff Hull.

In terms of the current box ticking approach to planning, there is nothing for the Loch Lomond and Trossachs National Park Authority to worry about, however, as Flamingo Land claims Scottish Water is supportive of their approach and Scottish Water in their response to the application on 30th April ([see here](#)) said they had NO objection to the application.

However, the SMALL print says something rather different!!

*“For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system”.*

So where is all the extra surface water draining from Woodbank going to go? Flamingo Land needs to explain this in a way that everyone can understand.

While Scottish Water states it has sufficient capacity in principle to supply water to the development from its Alexandria Water Treatment works, it cannot confirm whether there is sufficient capacity to treat foul water at the Ardoch Waste Water Treatment works and has asked for BOTH a Water Impact Assessment and a Drainage Impact Assessment. Its not clear from the Planning Portal if Flamingo Land has completed these assessments but without them, and without Scottish Water’s response, its impossible to determine whether the development can be serviced or not.

Why the Loch Lomond and Trossachs National Park Authority believe they are in a position to take a decision on the planning application before they are clear whether it can be supported by existing local infrastructure is not clear. Perhaps officers are going to recommend its refused because of a lack of adequate plans?

Local resident, Kenny Gibson, summed up the concerns about drainage and the Woodbank House part of the development in the objection he lodged in May:

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Due to sewage problems and flooding, the residents in Old Luss Road were provided with the results of a comprehensive and thorough survey on the sewage and drainage systems in Old Luss Road and the surrounding area in 2017/18 which was carried out by Scottish Water (SW).

This resulted in the identification of blockages due to tree roots in the system, which are now subject to an annual inspection and repair, but should be replaced or lined at some stage to prevent the tree root ingress.

It was also identified that the ageing system in Old Luss Road was not in a good state of repair and was at the limit of its capacity.

A consequence of these issues was that SW fitted non-return valves to properties 12 & 14 Old Luss Road to prevent sewage backflow and flooding to the properties.

The limit of its capacity in this area was due to additional sewage discharge of new local developments (from 6 dwelling houses to 14), Queen of the Loch hotel, Lomond Woods caravan park, Cameron House lodges, Princess Rose restaurant and McDonald's restaurant.

Flooding also occurred in this area due to road drainage issues which West Dunbartonshire Council have unsuccessfully attempted to correct due to lack of inspection and a corrective maintenance plan.

When the original Woodbank House development by Flamingo Land (FL) was announced we sent SW an email regarding our concerns over the sewage infrastructure and the resultant discharge from that development into the Old Luss Road system. The original development was for a total of 48 properties. A revised application has been presented by FL. The development now consists of 71 properties (a considerable increase), consisting of 6 dwelling houses, 15 flats and 50 lodges.

We are now even more concerned due to the vast increase in the number of properties being developed and the impact they will have on the existing sewage and drainage systems.

We hope that LLTNP can understand our concerns regarding the use of the existing ageing sewage system by the proposed development.

This objection is against the proposed development until a comprehensive review and upgrade of the ageing existing sewage infrastructure is proposed and included in the revised plans by FL along with a proposal on drainage ensuring flooding in the area is not worsened putting the current residential properties in the area at further risk.

While my initial reaction was that Woodbank House was the least controversial part of the planning application, I now believe the lack of adequate plans for drainage coupled with the propensity of the area below it to flood are sufficient in themselves for the LLTNPA to reject the application for planning permission in principle. This is NOT sustainable economic development and the LLTNPA should have adopted a precautionary approach long ago.

## Category

1. Loch Lomond and Trossachs

## Tags

1. flamingo land
2. Governance
3. LLTNPA
4. planning

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