

Flamingo Land, the Woodbank House site and the National Park's Local Development Plan

Description

The first reason West Dunbartonshire Council gave for objecting to the Riverside and Woodbank House Planning application was that local Councillors regarded it as *“overdevelopment and departure from the Local Development Plan”*. In planning terms this is very important because Local Development Plans are meant to set a framework for what type of development takes place where and as importantly where development should not take place at all. Flamingo Land has tried to refute the two main points WDC has made about this. Last week I took a look at Flamingo Land's claims that it is not true that Drumkinnon Woods had been specifically excluded from the Local Development Plan ([see here](#)). This post takes a look at Flamingo Land's claim that building housing on the Woodbank House site is not contrary to the LDP either.

WDC's objection to the Woodbank House part of the site was on the basis that the *“applicant seeks to develop areas zoned for tourism opportunities with residential housing”*.

Flamingo Land's response was as follows:

- a. The proposals include 15 apartments within a refurbished Woodbank House on the grounds of Woodbank House. This limited residential enabling element is in order to fund the reconstruction and refurbishment of Woodbank House. The costs of doing this have defeated others in the past and the house has lain in a ruinous state for a considerable period of time. The ability to undertake this type of work is specifically provided for under the terms of LDP Policy, Historic Environment Scotland recognises that *“Where a listed building is seriously at risk from neglect or decay, it may be possible to secure an appropriate new use, enabling development may be supported”* and is recognised from the outset of the project, and following feedback from Historic Environment Scotland the volume of residential development has been significantly scaled down and the retention of Woodbank House facades, to 6 houses and the refurbishment of Woodbank House as 15 private apartments. The substantial benefit that will be derived from reconstructing a Grade A listed property of National importance is outweighed by the limited need to build some housing to fund it. There are numerous other arrangements where Scotland's Historic Houses have fallen into disrepair and development is required to create a funding stream.

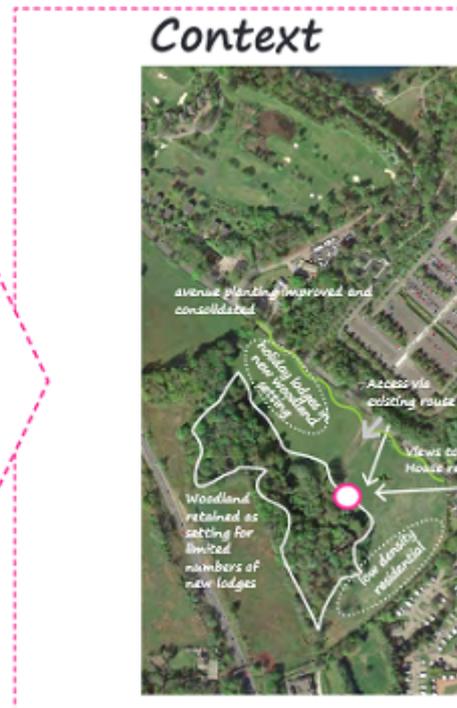
Note how Flamingo Land's response completely fails to mention that the Local Development Plan had zoned the whole of the Woodbank House site for *“Visitor Experience”*, the new planning jargon for *“tourism”*. In effect Flamingo Land's argument is that they need to build housing on

part of the Woodbank House site in order to pay for the preservation of Woodbank House itself, which is a listed building, and they argue this is covered by the LLTNPAs policy of "enabling developments".

Enabling development, however, does not need to be housing, whether for sale or otherwise and what Flamingo Land's response fails to say is that the LLTNPAs had already allocated other sites for housing to meet Scottish Government housing targets, including a small site in Balloch.



In fact, while the LDP is short on detail on almost everything, one thing it did say (see above) was "several development opportunities support the aim of bringing back into use great listed buildings", including Woodbank House. In other words, the tourism was to be the enabling development and a renovated Woodbank House was seen as being another attraction to bring visitors to Balloch. So why does Flamingo Land now need 15 new flats and 6 new houses, which they describe as "a limited enabling residential development" to pay for this?



Design development

Design concepts for this zone have been developed using

- historic maps, aerial photos, and site visits
- landscape analysis
- structural survey of Woodbank House prepared by PBA Ltd
- Barham Glen Architects (RIAS Conservation accredited architects) have prepared an outline conservation report (attached as appendix)

Proposals also accommodate Loch Lomond and the Trossachs Local Development Plan designations and feedback from the Pre-application consultation process

This process has identified:

- Woodbank House as a local landmark, providing an aesthetic contribution to its landscape setting. It sits in an elevated position with important views towards it from the old Luss Road across an open area currently used for rough grazing.
- The importance of the setting of Woodbank House, including the previous walled garden, stables and other smaller ancillary buildings which are currently in a state of dereliction.

Woodland designated as ancient woodland located in a steeply sloping area directly behind Woodbank House

The Conservation Appraisal and Structural Survey identified that all structures, buildings and outbuildings are in a very poor condition, with extensive building works required to conserve and rebuild/reconstruct what remains.

The Applicants reviewed options for the reconstruction and conservation of existing buildings to identify whether there were any future uses which could provide sufficient revenue to make redevelopment financially viable. This determined that conversion of both Woodbank House and of associated ancillary buildings should be possible if funding is generated through enabling residential development on part of the Woodbank site.

Consultation with Historic Environment Scotland is proposed, once more detailed proposals have been developed.

The detailed design of retained facades and reused listed buildings within the Woodbank House part of the site will be addressed through future applications for planning and listed building consent.

Extract from revised design statement

The references to *conversion of Woodbank House* and *detailed designs of retained facades* in the Design statement are misleading and the next page makes clear what is actually proposed:

Retention and conservation of the original east (principal) Woodbank House facade, in order to preserve and improve key views from the Old Luss Road

Flamingo Land in their response to WDC (above) describe this as *reconstruction and refurbishment of Woodbank House*. No, its not! Flamingo Land is proposing to keep one facade and behind this

will be a:

â??Redevelopment and extension of the property to form [15] new flatsâ?•.

So, why are 15 new flats and 6 new houses needed to pay for the retention of this one facade? Indeed given the intensity of the rest of the tourist development being proposed for the Riverside site and Drumkinnon Woods, one might ask why is this NOT sufficient to pay for the retention of not just one facade of Woodbank House but a whole lot more?

To give LLTNPA officers credit, they did ask Flamingo Land to justify the â??enabling developmentâ?• and clarify what was actually being proposed a year ago:

- On the basis of the information submitted, the application does not appear to meet the requirements and criteria set out in LDP Historic Environment Policy 1(b) to justify substantial demolition of the remaining structure of this Category A listed building or associated buildings. Similarly there is insufficient information to justify support under Historic Environment Policy 1(c) for the proposed extent of enabling development (20 houses) to support financing of what appears to be the substantial demolition with preservation of the east facade of Woodbank House only and conversion of part of the stables. An options appraisal is required to demonstrate why the extant structure of Woodbank House, as the principal listed building on the site, cannot be retained, reconstructed (where required) and reused to meet the aforementioned policies.
- The extent of enabling works seems excessive in relation to the works proposed to listed Woodbank House. The proposal for enabling development to secure works to Woodbank House & associated listed buildings, requires further detailed financial justification and supporting information. This is necessary in order to justify the extent of enabling development proposed (and profit return resulting from this) to overcome any resultant conservation deficit from these works. We require further financial information that provides more detail and specific breakdown of the costs (including those costs relating to the proposed demolitions) for all of the existing buildings on the site and how the returns/profit from the housing might offset the conservation cost deficit.

Extract from email dated 8th August 2018 in which the LLTNPA asked Flamingo Land to respond to number of points on their application. This letter and Flamingo Landâ??s response were obtained as part of a wider FOI submitted by the adviser to the Scottish Greens asking for correspondence between the Park and Flamingo Land. These are available on the FOI section of the LLTNPAâ??s website (see [here](#)).

As a result of this intervention, Flamingo Land reduced the number of houses â?? 20 had originally been proposed as enabling development â?? to six but added in 19 self-catering lodges. The FOI response then shows that the LLTNPA had to ask again, in an email dated December 2018, for the financial justification for the enabling development:

It is also noted that there appears to be no reference to the provision of financial information relating to justifying the enabling development. Can you also confirm if you intend to provide this.

The FOI response shows the Park then received this information but they have refused to release it, claiming that is NOT in the public interest. That appears wrong. It hard to see how the LLTNPA Board can take a decision about whether the proposed â??enabling developmentsâ?• are justified or not

without this information and their decision making process needs to take place in public. What's more without detailed plans about what is actually proposed the application is only for planning permission in principle its impossible to ascertain whether any financial information that has been provided is accurate or not.

Another fact that Flamingo Land failed to mention in their response to WDC trying to justify this enabling development was the price they paid for the Woodbank House. They bought this on the cheap, reflecting the presence of the listed building (a liability in financial terms) and its zoning for tourism (including open space). Parkswatch has previously pointed out that if planning consent is given for any part of the site to be changed to housing that will increase its price significantly making enormous profits for Flamingo Land.

Given all these facts, Flamingo Land's justification for housing on the Woodbank House site looks just as misleading as their attempt to justify the development of Drumkinnon Woods. West Dunbartonshire Council were right to object to the development as contrary to the LDP. Let's hope local Councillors hold their ground and ask to address the LLTNPA Board Meeting which will decide the application to make quite sure Board Members are aware of the issues.

Category

1. Loch Lomond and Trossachs

Tags

1. Development Plan
2. flamingo land
3. LLTNPA
4. planning

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