

Flamingo Land's attack on democracy and unsustainable approach to transport

Description

In the run up to the National Park's hearing on their Planning Application on Tuesday 24th September, Flamingo Land appear to have decided to go onto the offensive. Besides their attempt to discredit West Dunbartonshire Councillors objection to the application ([see here](#)) and ([here](#)), which I will consider further below, they have been feeding more misinformation to the national media.

Recent coverage in the Daily Record

On 22nd August Andy Miller, Flamingo Land's Sales Director, accused opponents of muddying the waters through misinformation before doing exactly that himself ([see here](#)):

"One of the frustrations we continue to have is of those who have indicated a strong feeling against the development continually put out information that is not true to muddy the waters.

"It's frustrating because there's people out there who are getting mixed messages and we want to give them the true picture.

"In particular, there's a lot of misunderstanding around the history of the piece of land in question.

"It is a brownfield site and it is marked for tourism development.

The Riverside Site is NOT a brownfield site. It was for a time after the railway shut but was then re-landscaped. It is now, apart from the buildings at the pierhead, public open space as anyone who has visited in the last twenty years knows. Nor is it true that *"it is earmarked for tourist development"* whatever that is taken to mean. It's true that some of the land owned by Scottish Enterprise and Flamingo Land was identified for development in the Local Development Plan, but a significant proportion of the land included in the Planning Application – about 40% – has not been earmarked for ANY development. This includes Drumkinnon Woods and the land across Drumkinnon Bay where Flamingo Land is now proposing to build a boat house and water based activities (which will compete against existing local businesses).

Misinformation or lies? I will leave it to readers to decide. While Flamingo Land has been spouting such claims, their partners in the development, Scottish Enterprise have remained silent. Why hasn't their Chief Executive, Steve Dunlop, issued a public statement correcting all the misinformation that Flamingo Land have issued about what is a JOINT Planning Application that SE have substantially paid for out of the public purse? Or has Scottish Enterprise no sense of ethics either?

Flamingo Land boss blasts MSP who helped block Loch Lomond resort in bizarre rant

Andy Miller was followed a few days later ([see here](#)) by his boss, Gordon Gibb, the owner of Flamingo Land. His attack on Ross Greer, appears to have been prompted by a recent letter from the MSP which suggested Mr Gibb should stick to the promise he had made in September 2016:

“if our plans are not welcomed by most of the people in Scotland then we will not proceed further.”

Instead of explaining why he had dropped this commitment, Mr Gibb turned on Ross Greer calling him a “very inexperienced politician” who is unqualified to “advise anyone on anything that is important in the adult world”. In a bizarre rant, the CEO added: “We unreservedly reserve all our rights against you,” before telling the elected politician: “The people of Scotland have not spoken and you certainly don’t speak for them.”

Over 55,000 people have objected to the Planning Application, the most in Scottish History. If that is not enough for Mr Gibb – and local politicians understand what that says very clearly – it would be easy enough for him to commission a national opinion poll. And he could always ask Scottish Enterprise to pay.....

Flamingo Land and traffic

A large part of Flamingo Land’s response to West Dunbartonshire Councillor’s objection to the Planning Application concerns traffic. The response provides a text book example of a developer trying to muddle the waters.

3 Bullet Point 3

- *The proposed development site is embedded within an established road and access network and will principally be accessed by the A82 and A811 and locally by Balloch Road, Old Luss Road, Pier Road and Ben Lomond Way. While it is recognised that users of the facilities will be encouraged to use public transport and that discussions are ongoing with ScotRail/ Abellio to agree in principle promoting access to the development by rail, it is accepted that the majority of people will come by car thus having a significant impact on the local road network. The applicant has accepted at a formal consultation meeting with Councillors and site owners, that they will be adding to an existing problem of congestion.*

First of three points on traffic made as part of WDC objection

In response to WDC’s point that the development will increase traffic in an area which suffers congestion, Flamingo Land first points out that neither Transport Scotland nor Council Road Officers objected:

- 3.1.2 All supporting transport assessment and analysis of the local and strategic road network was undertaken in accordance with current technical standards and good practice guidance and agreed with both Transport Scotland and West Dunbartonshire Council Road Officers, through documented Scoping Discussions and Correspondence.
- Transport Scotland's Director of Trunk Road Network Management Advice, does not propose to advise against the granting of planning permission.
 - West Dunbartonshire Council Roads Officers recommend 'No objections subject to conditions'.

This misses the point. Officials sometimes – for whatever reason (in this case it appears to be the result of faulty Transport Assessment Methodologies) – reach the wrong conclusions. That is one reason we have elected representatives, they can bring a welcome reality check. Anyone who has tried driving along the A82, past Balloch, on a holiday weekend and been stuck in queues, will question the wisdom of attracting yet more traffic along that road. Meantime, on such weekends or at special events, as many local people have attested, the village can become gridlocked.

Flamingo Land dismisses this, referring to their own Traffic Assessment which they argue was conducted according to recognised standards:

- 3.1.3 The statement that people 'will come by car thus having significant impact on the local road network', is inaccurate. The TA concludes that there is no significant impact on the road network:
- "Due to the number of additional vehicle trips that are anticipated as a result of the proposed development, it has been demonstrated that there would be **minimal impact** on the operation of the local road network. It is widely known that the summer season, good weather and local events can increase through traffic, particularly on the A82 and the A811, as well as Balloch and Loch Lomond Shores-bound traffic. This is an upshot of the proximity to Loch Lomond, the wider Loch Lomond & Trossachs National Park and the functionality of the A82 as the main strategic access road to the north west of Scotland. During a neutral assessment period, the development traffic is not anticipated to exacerbate the prevailing operational status quo, albeit a Traffic Management Plan should be implemented for additional and significant trip-generating events and activities in the locality, regardless of season. Further, the access and parking proposals for the new and existing Loch Lomond Shores development, should be closely monitored and managed to ensure optimal efficiency for the local and wider road network."*

In plain language, what this says is that at normal ("neutral") times – including midweek rush hour for example – the development won't have any significant impact on traffic. That again misses the point entirely. It's the peak periods, such as holiday weekends and special events, that are the issue.

Flamingo Land then half recognise this but claim it's not their responsibility to address existing traffic problems:

- 3.1.4 There is reference to an '*existing problem of congestion*', which appears to be taken out of context. There is a recognition that the development will bring additional traffic to the area, but not so much as to warrant remedial or junction operating improvement works. Congestion in the area is typically attributable to sporadic occasions when there may be accidents on the road network, good weather days, local events and/ or road works, but is not a daily and/ or 'neutral' day occurrence throughout most the year under normal operating conditions (see applicant's response to Bullet Point 5, below). The applicant is responsible for the issues their development will introduce to the network which have been identified as minimal in the TA. It is not the responsibility of this applicant to rectify existing issues on the road network, nor is it in their commercial interests to create further congestion issues that are not capable of being solved.

Once again this misses the point. The question is how far will the Flamingo Land Development increase traffic in the area?

Interestingly, Flamingo Land say nothing about this in their response to WDC's objection. However, in their revised Parking Strategy ([see here](#)), lodged on 5th April, they do give an indication of the number of additional cars that will be brought to the area by the development as its currently proposed:

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Table 6.1 - NRDG Parking Standards

Development Use	Quantum	Proposed Sta
Parking to be provided in proximity to Station Square (Pier Road		
Brewery incl. pub	300sqm	10 spaces/ 100
Restaurant	150sqm	1 space / 5sqm
Youth hostel	32 beds	1 space/ 4 stat
WDC Park & Ride Requirement	-	-
Parking to be provided remote from accommodation (LLS Overs		
Woodland Lodges (Riverfront)	43	1.5 spaces per
Woodland Lodges (Drumkinnon)	32	1.5 spaces per
Parking to be provided at the Pierhead Area		
Apart Hotel & Rest.	60 beds	1 space/ 2.5 b
Water Park	600sqm	10 spaces/ 100
Iconic Visitor Attraction	TBC	Subject to futu

Exclude the 44 places linked to the Park and Ride by the station and that's 314 extra cars for the Riverside Site. On top of that there is the provision for Woodbank House:

Development Use	Quantum	Proposed Standard
Parking to be provided within Woodbank House Site		
Residential units (private)	21	1 or 2 spaces/ dwelling
Woodland Lodges	35	2 spaces/ lodge
Woodland Bothies	15	1.5 spaces/ 1 bed
Holiday Apartments	6	1 space/ bed
Sub-Total at Woodbank House Site		
Total Parking Requirement Across Full Application Site		

Take away the 44 Park and Ride from the total and that is still 449 extra cars that are anticipated when accommodation is fully occupied. That is most likely on popular holiday weekends and special events, precisely those times that Balloch becomes gridlocked at present.

The Parking Strategy, however, makes it clear that this proposed provision may not cover all the extra cars. For example, there will be day visitors to the rope walks and other attractions proposed for Drumkinnon Woods, to the waterpark and to the "iconic visitor attraction", whatever that is. Its because of this that Scottish Enterprise has been negotiating with the owners of Lomond Shores to use some of the parking capacity there:

Since then, So
response to the submission made by Icen Projects on
that:

*"The principle of utilising some existing ca
verbally at the January 2018 Proprietors
submitted. This in principle agreement wi
agree a commercial position on a how thi
same meeting, it had been agreed that fu
would take place following the PPIP deter
any detailed plans."*

This demonstrates that WDC Councillors were completely right to conclude that the development, if it goes ahead, can only add to existing traffic problems. Importantly, they then also concluded that these issues will not be addressed by standard "mitigation measures":

4 Bullet Point 4

- Given the scale of the existing road capacity problem during peak visitor times, standard mitigation measures such as an Access and Parking Management Strategy and Enhanced Signage and Variable Message Signage (VMS) installed at key approaches to the site will do little to assist in reducing the impact of the development on the road network.

Second point in WDC's objection on traffic grounds

Flamingo Land's response to this is to try and muddy the waters:

Applicant's Response

- 4.1.1 This statement is inaccurate as assumes that the proposed mitigation measures referenced here (Access and Parking Management Strategy and Enhanced Signage and Variable Message Signage) are intended to alleviate existing road capacity issues during peak visitor times. Firstly, the Transport Assessment has identified that any traffic impacts on the road network during the peak times are anticipated to be minimal and do not require remedial or junction operating improvement works. Secondly, any interventions proposed by the development are not intended to address the 'existing road capacity problem during peak visitor times'. Instead they are designed to A) further reduce those minimal traffic impacts on the road network, and B) introduce efficiencies for the development proposals by reducing unnecessary internal circulation and ambiently and effectively directing traffic to key destinations/ car parks.

In plain words, Flamingo Land accuse councillors of getting it wrong because the traffic mitigation measures they propose are only intended to deal with ordinary traffic volumes and were never intended to address the peak periods when severe congestion and gridlock occur!

They then clutch at straws:

- Parking arrangements for the woodland lodges is intended to be remote from the lodges themselves. Guests will require to bring their vehicles to a designated parking area, where their vehicles will remain for the duration of their stay on site, with the exception of off-site vehicular trips to other destinations. This will reduce unnecessary and short-vehicle trips;

and

- Visitors to the site will be informed at the point-of-booking of the effective use of the correct road hierarchy, avoiding local roads should park, to assist in reducing unnecessary circulation. This will be endorsed with the environmental and sustainability objectives with the hope of encouraging increased use of walking, cycling and public transport movement to and through the site. This would include signage throughout the site;

Why would people drive to Flamingo Land and then leave their vehicles parked for the duration of their stay? If you intended to stay put, it would make much more sense to come by train. This raises the question why 1.5 parking spaces have been allocated to EVERY SINGLE WOODLAND LODGE?

WDC then back up their two substantive points by commenting on the adequacy of Flamingo Land's Transport assessment and the evidence of what happening locally:

5 **Bullet Point 5**

- *Roads guidance in relation to network capacity and no assessment was carried out during sunny professional officers' report to Council states that*

good weather weekends and local events can increase traffic significantly on the A82, A811 and the local roads, all to the detriment of the local area. It is considered that this development could exacerbate existing conditions. Concerns are expressed that the impact of this development has not been fully assessed as peak times such as good weather weekends and during the summer months to determine the associated amenity and environment effects on the wider area": Council believes that the scale of the problem is such that the type and scale of development being proposed would cause unacceptable disruption, not only to local people, but also to commuters and visitors travelling north on the A82, who already suffer serious delays at these peak times.

Flamingo Land's response again tries to muddy the water by claiming that the facts of what is happening on the ground are irrelevant to the Transport Assessment!

- Should the traffic surveys for this development have been undertaken in a manner counter to national, regional and local transport policy and guidance and during a non-neutral day, the data would not be valid because:
 - During school/ summer holiday periods, there is considerably less traffic on the road network during the typical weekday AM and PM peak periods, as a result of a huge cohort of the population (primary, secondary school pupils and teachers) not having to travel at those times, as well as parents either not being at work and not travelling, or simply choosing not to travel at those times;
 - During event periods and/ or good weather weekends, local people will generally not travel to the same extent, take alternative routes to avoid busier roads, and/ or avoid travelling altogether;
 - Any data that may be gathered during an event, such as the Great Scottish Swim, for example, would be completely useless in evaluating the typical road network operating conditions. Speeds would likely be slower due to higher-traffic volumes which would underestimate safety issues; turning movements at key junctions would be distorted, as people opt for alternative routes and; principally, any potential design and engineering mitigation that may be required for 'unusual' events, would result in over-engineering and over-provision of unnecessary infrastructure. Further, the upshot of excess capacity and space on the road network is typically higher-speeds, increased accident propensity, safety issues and crossing/ access issues for pedestrians and cyclists; and

As an aside, don't local people also have a right to travel on "good weather weekends"? Welcome to the warped world of the would-be new lairds of Balloch.

Flamingo Land then repeat what they said in 3.1.4 (above), that existing travel congestion is not their responsibility:

- Fundamentally, it must be recognised that the existing impacts of local events in Balloch, such as the Great Scottish Swim and Christmas Light Switch-On at Loch Lomond Shores amongst others, require to be accountable for the issues they introduce to the road network. It is not the responsibility of this applicant to rectify existing issues on the road network;

Amongst all the jargon and red herrings, nowhere is there any acknowledgement by Flamingo Land – nor by their partners Scottish Enterprise for that matter – that in the National Park there is a legal

requirement that ALL development to be sustainable.

Traffic, the global environmental crisis and the planning system

Cars and traffic – and I am a driver – are central to the global environmental crisis we have created and its solution. They play a significant role in the amount of carbon we are adding to the atmosphere (both in their operation and manufacture) and cause much pollution. They have played a key part in making people less active and the epidemic of health problems associated with this and cause much stress (does anyone enjoy being stuck in traffic?). Addressing these issues will not be easy but we need to start somewhere and, with the Scottish Government's declaration of a climate emergency, all our Public Authorities need to grasp the nettle.

There could be no better place for the Loch Lomond and Trossachs National Park Authority Board to show a lead than Balloch. First, there is already a significant existing problem and great concern locally about the increased traffic levels that would be created by the Flamingo Land development as proposed. Second, unlike many areas where there are few alternatives to cars, the basis for a high quality public transport system is already in place, both because of the railway and the boats that operate on the loch.

There is thus no reason why the LLTNPA shouldn't insist that the starting point for any new tourism associated development on the Riverside and Woodbank House sites is that it should be effectively car free. By that I mean any tourism development should not result in any net increase in traffic whether by visitors or staff (some provision would be allowed for people who because of their disabilities cannot travel by public transport). If people can park their cars outside the hotel or woodland lodges for the duration of their stay, as Flamingo Land suggest, they can travel there by public transport too. If Flamingo Land and Scottish Enterprise cannot come up with a set of proposals that are attractive enough to motivate visitors to leave their cars behind and to persuade staff to get to work on foot, by bike or by public transport (45 parking places are proposed for the "service area") then the planning application should be refused.

The LLTNPA powers that be, of course, are likely to claim that they are bound by existing policy – whether standardised transport assessments which require 1.5 car parking spaces for each lodge or the policies contained in the Local Development Plan – and therefore legally they are unable to insist any tourist development should be car neutral. That, however, would effectively be to ignore the Scottish Government's declaration of a climate emergency – let's wait another three years till we do anything! Moreover, it would also be to ignore the four statutory aims of our National Parks set by the Scottish Parliament. These include a duty to promote sustainable economic development and make wise use of resources. Those duties could be called upon to override any existing policies which are no longer fit for purpose. Given a little will, the LLTNPA could support the objection made by WDC Councillors and refuse the Flamingo Land Planning Application on the grounds it will result in an unsustainable increase in traffic.

Category

1. Loch Lomond and Trossachs

Tags

1. Development Plan
2. flamingo land
3. LLTNPA
4. Local communities
5. natural environment
6. planning
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8. Tourism

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