

## The new campaign against Flamingo Land â?? for nature and people in the National Park

### Description



Looking down onto Drumkinnon Bay, illustrating how important the woodland landscape is to the character of Balloch. The main part of Drumkinnon Woods is behind Loch Lomond shores and to the right of the photo (taken October 2019).

Following my post ([see here](#)) on the new planning application from Flamingo Land to develop much of the Riverside and Woodbank sites at Balloch, opposition to their revised proposals appears to be growing.

### The debate in the Scottish Parliament

Yesterday, there was a debate in the Scottish Parliament, sponsored and led by Green MSP Ross Greer, on the following motion:

*That the Parliament notes the reported application lodged by the Yorkshire-based theme park operator, Flamingo Land, for the development of a so-called "luxury resort" on the banks of Loch Lomond at Balloch; understands that this is Flamingo Land's second application for a development on the site, with the first application reportedly having been withdrawn following a record 60,000 objections being lodged with the Loch Lomond and The Trossachs National Park authority; congratulates local residents and the Save Loch Lomond campaign for, it believes, having protected the ancient woodland at Drumkinnon Woods, which it understands is no longer the proposed location for dozens of guest lodges, but remains concerned about a number of reported issues with the current application, including its overall scale, public access to Drumkinnon Woods and the wider site, pressure on local roads and the principle of selling public land at one of Scotland's most famous locations to a private developer.*

The debate, although very poorly attended, was well worth viewing ([see here](#)). While the claim in the motion that Drumkinnon Woods had been saved was not true (see below), Ross Greer corrected this in his speech acknowledging that ancient woodland across the site was still under threat.

Ross Greer went on to make a powerful case against the development which he said was too big, would threaten the ability of the public to enjoy the Riverside Site and was totally inappropriate for a National Park. It was particularly welcome that he placed his concerns about the increased traffic that would result from the development going ahead within the context of the need for a much wider green transport plan for the National Park as a whole. All this was very re-assuring for anyone, like myself, who was concerned that he might have stopped campaigning against Flamingo Land because his party is now in government with the SNP.

Rhona Mackay, the SNP MSP for Strathkelvin and Bearsden, followed and also spoke strongly against the development. Like Ross Greer, she opposed the proposed sale of the public land currently owned by Scottish Enterprise to Flamingo Land and spoke of the value to people living in her constituency of the bonnie banks being kept free of development (all developers please note!) That of course was the main reason why the Loch Lomond and Trossachs National Park Authority (LLTNPA) was created 20 years ago: to enable and facilitate people living in the Clyde and Forth Valley urban conurbations to enjoy unspoilt countryside on their doorstep.

Pam Gosal, MSP, spoke for the conservatives. She too re-iterated that Loch Lomond was a truly special area, was concerned about the impact of the proposals on ancient woodland and argued that any development should only go ahead if it was supported by local residents and helped, rather than competed with, local businesses.

Jackie Baillie, the local labour MSP, was the last proper speaker. She appeared to have been lobbied by both sides and perhaps as a result of this was still sitting on the fence, although she too expressed concerns about the density of the development, the impact on ancient woodland and the adequacy of local infrastructure to accommodate more visitors. I was slightly surprised when she stated she was not opposed to the sale of public land in principle. She did, however, make the point that the public need to know how much Scottish Enterprise is shelling out to Flamingo Land in the form of grants compared to what it is likely to get in receipts.

George Adam for the Scottish Government wound up saying he couldn't say anything since the planning application is live.

Mr Adam was no doubt right as the final arbiter of planning decisions the Scottish Government needs to be seen to be neutral but precisely because they are neutral, local politicians and Board Members involved in planning decisions should be able to express their views and those of local communities rather than being gagged, as is happening at present in the LLTNPA.

Missing from the debate was any recognition that it is not just the planning process and public authorities subsidies to developers that has created a planning system stacked in favour of developers. It is the complete absence of any support what was once known as community development to local communities to develop alternatives. Ross Greer referred to the many different ideas people have had for the Riverside Site but the fact is none have got off the ground. The LLTNPA could have provided support but chose not to do so.

Until this changes, unfortunately, there will always be pressure on planning authorities to approve developments like Flamingo Land however inappropriate on the grounds they are the only real option on the table and will create jobs (however poorly paid).

## **Flamingo Land's impact on Drumkinnon Woods and ancient woodland**

There have now been over 60 responses to the application lodged on the planning portal ([see here](#)), some in favour but most against. This part of the post uses information from some of this to consider the impact of the proposed development on ancient woodland.

The main change to the revised Flamingo Land planning application compared to that submitted three years ago is that the lodges planned for the block of woodland between Loch Lomond Shores and the housing estate to the south, commonly known as Drumkinnon Woods have been moved to the grounds of Woodbank House to the west. It was these lodges and associated buildings which were one of the main reasons LLTNPA officers recommended their Board reject the application before it was withdrawn at the last minute in September 2019:

*The proposed lodges and reception buildings within Drumkinnon Wood would result in an unacceptable loss, deterioration and fragmentation of ancient woodland habitat.*

I suspect it was this which led Ross Greer and others to claim initially that Drumkinnon Woods had been saved. However, another part of the ancient woodland survives and Flamingo Land still wishes to develop as a service area (area 10 in the new planning application):

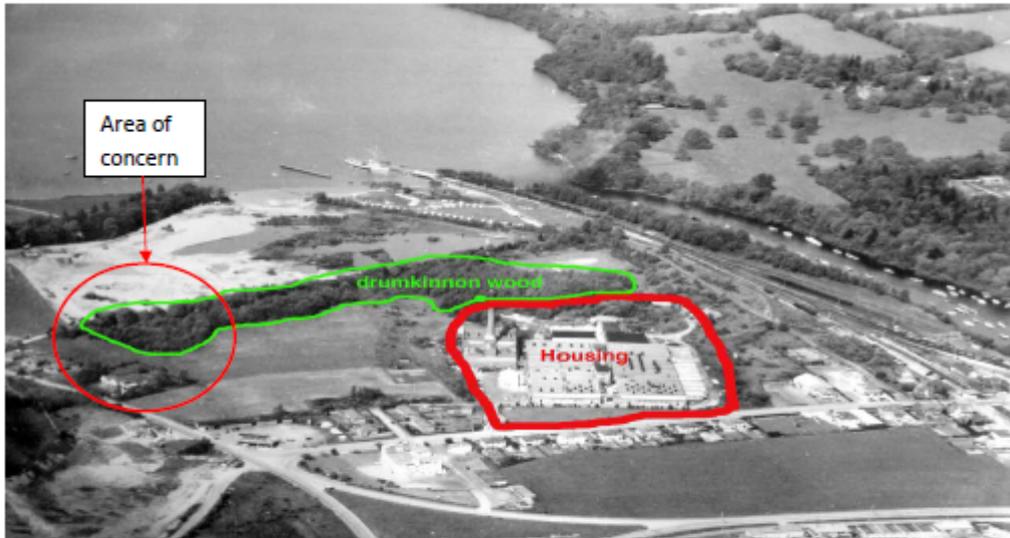


FIGURE 2

Annotated photo of aerial photograph of Drumkinnon Woods from 1960s taken from a local resident's objection to the application. The construction of the car park for Loch Lomond shores destroyed part of Drumkinnon Woods but split it in two.

Flamingo Land has responded as all developers do in these circumstances, rather than changing their plans to protect the natural environment, they have commissioned a report from a woodland consultant which says that the impact on ancient woodland would be not that great. Usually this works, which is why ancient woodland sites across Scotland continue to be lost at such a steady rate, despite official government policy, which is that ancient woodland should be protected.

In Flamingo Land's case, 20 pages of the Environment Impact Assessment ([see here](#) pp 75-95) have been devoted to arguing that the ancient woodland across the proposed development site is not as extensive as recorded on the Ancient Woodland Inventory and generally of low importance. It is not an easy read and few planning officers have the knowledge or skills to challenge such technical assessments. That helps explain why so much ancient woodland has been destroyed.

This points to a wider problem with the planning system. Because it is left to developers to commission reports, experts are beholden to them to get employment and risk have their report rejected and not being paid if they write anything that might block the development. As a result the planning charade continues. This is not the fault of the consultants, who need to earn their crust, but of the system. The Scottish Government needs to reform the system so that developers re-imburse pay planning authorities for the cost of engaging consultants. It would enable such consultants to be far more independent and result in much better decisions.

Luckily in the case of Drumkinnon Woods, local residents have been conducting their own investigations (having tried to engage Flamingo Land unsuccessfully as I know from having seen correspondence that was copied in to MSPs and others). These investigations have reached opposite conclusions to those contained in the EIA!

First, the proportion of area 10 which contains ancient woodland appears larger than that officially recorded on the Ancient Woodland Inventory:

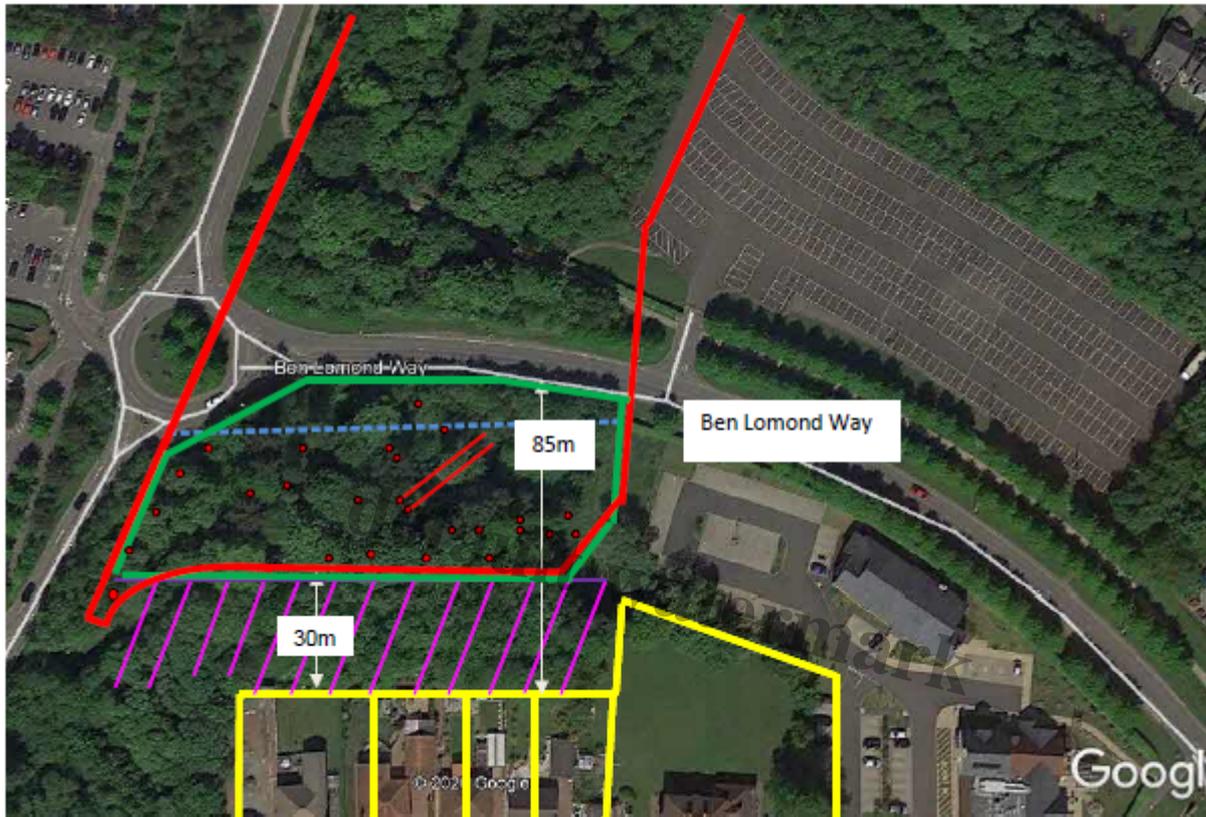


FIGURE 1

- Boundary of Drumkinnon Wood in accordance with the Scottish Ancient Woodland Inventory
- Boundary of Drumkinnon Wood in accordance with investigation
- Part of Drumkinnon Wood located in Area 10, South West of Ben Lomond Way in accordance with investigation
- Residential property boundaries
- Area of Environmental 30m tree buffer zone planted in conjunction with Loch Lomond Shores development in 2002 to protect residential properties from air and sound pollution.
- Established mature trees.

Second, they show that the area of woodland included in area 10 is of considerable value:

### Inspection of Trees in Area 10

Fig.10 below shows a comprehensive map (taken from Fig.1) of the mature trees in the established mature woodland contained in Area 10 as identified in Fig.1. The map shows-

- a) Approximate position of trees
- b) Colour coded type of tree
- c) Any identified features

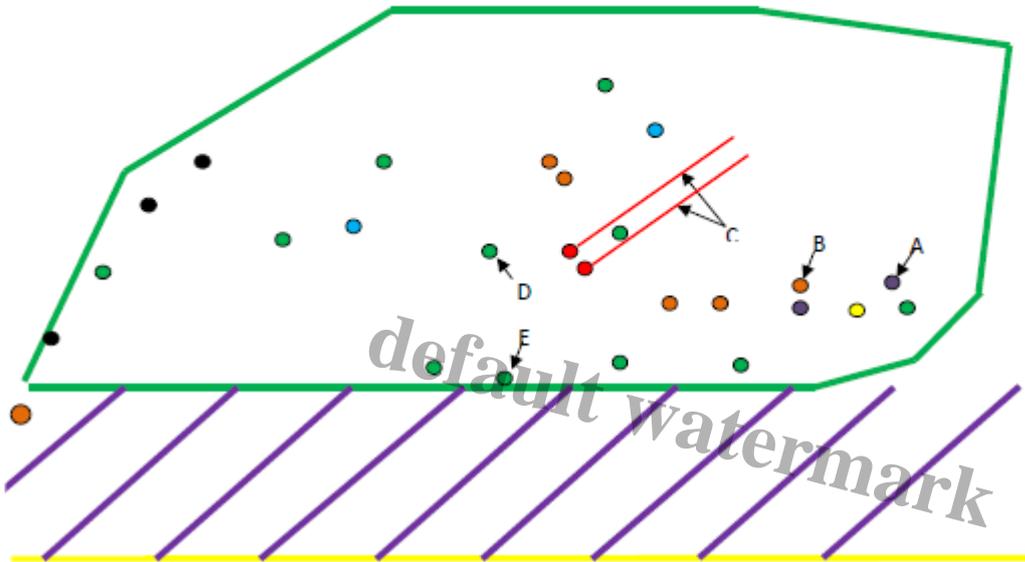


FIGURE 10



All trees identified (except C & E) are **mature, substantial, healthy trees in excess of 50 years old**, based on the date of the 1900 ordnance survey map (Fig.3). These trees support an abundance of wildlife, mosses and lichens etc.. Trees A, B and D have identified additional features as described below.

It should be noted that the trees in the environmental planted area are 20years old and at their maximum CO<sup>2</sup> absorption.

Tree A – Grid ref. Lat. 56.00219, Long -4.593529. Is a mature oak tree **estimated in excess of 120 years old** with a large hollow in the trunk (shown in Fig.11 below), which does not affect the structure or stability of the tree and supports an abundance of above ground wildlife, which includes bats, squirrels and a variety of birds. The tree also has an identification tag 0390. What the tag means is unclear.

**This tree will be destroyed under development proposals.**

You can read the entire case, from which these extracts have been taken and which includes photos of the woodland, [here](#).

People power versus big developers subsidised and assisted by our public authorities!

Fortunately local residents are not entirely alone since they have strong support from the Woodland Trust which has for years been campaigning to protect ancient woodland:

Impacts to Ancient Woodland

*The Trust holds concerns regarding numerous elements of the proposals due to their potential impact on ancient woodland, including 0.48 hectares of ancient woodland removal. Our main concerns focus on the proposed staff and service area [i.e area 10] which will be sited directly adjacent to Drumkinnon Wood (grid reference: NS3841981925), and the direct loss of 2b LEPO woodland (grid reference: NS3808781881) from the siting of lodges/bothies as part of the Woodbank proposals. We also hold concerns regarding potential works at The Boat House. The existing boat house is sited within an area of ancient woodland (grid reference: NS3835582355) so any expansion works are likely to result in direct loss of the surrounding woodland.*

The Woodland Trust objection also makes it clear that the decision to move so many lodges to the grounds of Woodbank House, will have an impact on ancient woodland there. A more detailed independent survey such as that conducted by local residents for Area 10 would now be desirable to demonstrate whether Flamingo Land, in moving the lodges, has jumped out of the frying pan into the fire.

Having been presented with two very different pieces of evidence about the ancient woodland that will be affected by the development, the LLTNPA will now probably try and resolve those differences, most probably through seeking an opinion from their own woodland officer. What they should have done they are supposed to be a National Park Authority after all is to have made it clear to Flamingo Land that, in line with their earlier recommendation to reject the lodges in Drumkinnon Woods, they would not entertain further destruction of ancient woodland at Balloch.

## Wider woodland issues

The objection from the Woodland Trust makes some broader points about the indirect impacts that development has on ancient woodland including disturbance to wildlife, pollution, hydrology. A corollary of that is woodland, whether officially classified as ancient or not, is good for people's mental and physical health and is part of what makes a visit to Balloch and the bonnie banks so pleasurable and the village a good place to live.

Woodland also helps create the character of a place. It is what makes look and feel nice and can hide many but not all things which detract from the landscape, as my photo at the top shows. The issue with Flamingo Land's proposal to create a service area by the car park is therefore not just about preserving ancient woodland, it affects amenity and will detract from the positive experience people get when they arrive in car park.

Car parks may be generally unattractive places, but a car park surrounded by trees is a lot better than one surrounded by development. And a car park where the surrounding woodland was preserved and nurtured would improve the visitor experience still further. Central to the vision of the LLTNPA should

be the day when visitors to Balloch have a good chance of seeing red squirrels. The likelihood of that happening will reduce considerably if Flamingo Land is allowed to develop areas of ancient woodland or cut down older trees.

Setting aside the fact that this development is too big for a moment, if Flamingo Land really needed a service area they would have been much better digging up part of the car park. They could then have compensated other businesses for any drop in custom by improving links between the station and bus stops and Loch Lomond shores but instead, at present, their proposed monorail will only serve their own glitzy complex.

Unfortunately LLTNPA planning staff discounted the importance of these general factors, which is what makes much of the National Park special, in their original evaluation of the planning application. This time they need to be far more critical and consider the needs of people and nature as a whole.

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. climate change
2. conservation
3. LLTNPA
4. Local communities
5. planning
6. Scottish Enterprise
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