

new application to develop the area sometime in the future. This is a very real concern:

We're listening

We wanted to share some of the key issues which have been raised around the development and our plans to address them. You can find more FAQs about the development on our website www.lomondbanks.com

Issue raised	How we addressed it
Theme Park rides on site	The vision for Lomond Banks is to create a world-class family holiday village, not a theme park. We are taking inspiration from Center Parcs and other adventure parks in Scotland, such as Landmark. Our proposals include external activity and performance areas, children's play areas and picnic areas
Impact of lodges on Drumkinnon Wood and its ancient woodland	The ancient woodland of Drumkinnon Wood will be set aside as a woodland management and conservation project with a new management plan safeguarding its future use for all

Extract from Lomond Banks newsletter September 2021

Flamingo Land has made frequent claims that it has listened and will now protect the “ancient woodland of Drumkinnon Wood”. However, as I showed in my post last week ([see here](#)), it is still proposing to develop part of the wood as a service area (area 10 on top map). Either Flamingo Land don't know what they are talking about, in which case they should apologise publicly, or they cannot be trusted. All the more reason for the Loch Lomond and Trossachs National Park Authority (LLTNPA) to take a very firm approach when assessing whether the development is appropriate for the National Park and its Local Development Plan (LDP).

The LLTNPA's LDP and the Visitor Experience

The LLTNPA's current [LDP](#) was ostensibly intended to channel development within the National Park to settlements like Balloch:

“The Towns and Villages are central to the Plan's development strategy as this is where the majority of development is directed. This is appropriate as it is where the majority of services are located such as shops, schools, and health centres. As well as having these services the Towns and Villages can attract investment to improve connections to the rest of the Park and beyond through the road, rail and path network”

And within each settlement, the LDP identified areas for development which were then recorded on maps:

BALLOCH

Balloch sits on the shores of Loch Lomond and forms the southern gateway to the National Park.

Balloch attracts a high number of tourists with easy access from Glasgow. Balloch is notable for being the main access to Loch Lomond, the Country Park, Loch Lomond Shores and numerous historic buildings.

Future development includes housing, visitor experience, leisure and mixed use. Several development opportunities support the aim of bringing back into use great listed buildings including Balloch Castle and Woodbank House. Loch Lomond Shores is an exceptional retail and visitor attraction within the National Park and the links from the train station will be improved.

PROPOSED SITE & USES

HOUSING	H1
MIXED USE	MU1 MU2
VISITOR EXPERIENCE	VE1 VE2 VE3 VE4
TRANSPORT	TR1
PLACEMAKING PRIORITY	PP
TOWN BOUNDARY	---
CORE PATHS	---
OPEN SPACE	■



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By comparing the LDP map for Balloch with Flamingo Land’s revised planning application you can see that they are proposing to develop areas, including Area 10 and a boathouse in woodland by Drumkinnon Bay, that have never been earmarked for development. One might think, therefore, that the LLTNPA should have every reason to reject these elements of the development as being contrary to the LDP.

That is not, however, what happened with the original planning application which also included these areas:

- 8.2.12 Large areas of the site (Station Square, Woodbank and the majority of West Riverside and the Pierhead) have been identified within the Local Development Plan as being suitable for visitor experience uses. Within these locations the proposed tourism and leisure uses would be compatible with these land use allocations and are supported by Visitor Experience Policy 1 of the Plan. There are areas of the site proposed for tourism development that are not included within the LDP site allocations (namely a large part of Drumkinnon Wood, part of Drumkinnon Bay and two small areas located at the Riverfront and the Pierhead).
- 8.2.13 Balloch is identified as a strategic tourism opportunity, and although the majority of Drumkinnon Wood is not part of an allocated site in the current LDP, Visitor Experience Policy 1 supports new tourism development which is located within towns. Therefore, given that the 'non-allocated' areas are within the 'town' boundary of Balloch, the principle of tourism development can be supported provided a favourable assessment against the over-arching policies and relevant subject based policies within the LDP (such as those relating to the natural and historic environment). These are assessed later within the report under key topic headings.

Extract from the report to the LLTNPA Board in 2019 which appeared just before the planning application was withdrawn.

The logic here is fatally flawed. Why bother allocating any land for "Visitor Experience" within settlements if the Visitor Experience policy effectively allows tourist developments to happen anywhere within the boundary of towns and villages?

The whole point of producing spatial plans is to earmark areas where development might happen and areas where it shouldn't. Indeed, in 2015 when responding to comments on the draft LDP, the LLTNPA had rejected Scottish Enterprise's argument that Drumkinnon Woods should be included in the plan and this was then endorsed by the Scottish Government's reporter ([see here](#)). This did not prevent senior LLTNPA staff, who have been behind Flamingo Land from the start ([see here](#)), from trying to get parts of the proposed development in through the back door in their report to the LLTNPA Board 2019. The good thing is that having not considered or approved any element of the 2019 report, no precedents have been set and the LLTNPA Board is free to reject this flawed reasoning if staff attempt to repeat it.

One could also question how the proposed service block in Area 10, an industrial unit on ancient woodland, could ever be classed as being part of the "Visitor Experience". That points to a much wider problem with the LLTNPA's allocation of land for "Visitor Experience" which I have commented on before. The term can be interpreted to cover a wide range of potential tourist developments, from the low key – putting in a path – to Flamingo Land's proposals for an indoor water park and a monorail.

Unfortunately, this was not clearly explained when the LLTNPA consulted on their draft LDP. The result was that there were very few objections to the Riverside part of Scottish Enterprise's land at Balloch being allocated for Visitor Experience. Enhancing the path along the River Leven, which was supported by many local people, is a very different proposition from filling the rest of park on the Riverside site with holiday chalets as Flamingo Land is still proposing. Where land at Balloch has been allocated for Visitor Experience, the LLTNPA still needs to answer the question as to whether what is

proposed is appropriate for a National Park.

The implications of the out of date Local Development Plan

The current LDP for the National Park was supposed to run from 2017-21 and a revised plan approved this year. That would have enabled the LLTNPA, in the light of the response to the previous application, to consult the public further on what types of Visitor Experience were appropriate for Balloch and to produce a much clearer plan by which the Flamingo Land proposals might be judged. The LLTNPA has, however, delayed producing a revised plan:

“The plan is dated 2017-2021 but we have revised our timescales for the next plan and the current plan will remain in place until 2024 to align with the new planning legislation.”

This suits senior staff at the LLTNPA as far as the Flamingo Land planning application is concerned as it will make it easier for them to claim a large part of the development is compatible with its vague and woolly LDP. Some of them are no doubt hoping to receive OBEs, Orders of British Enterprise, as a result.

However, it's not just planning that is changing, lots of other legislation and policy is too all of which should be a material consideration when it comes to considering the revised planning application. For example, the LLTNPA is going to have to take a far more serious look at the impact the development will have on carbon emissions, whether this is through digging up ancient woodland and public parks (grassland stores carbon), encouraging more traffic or the energy that will be consumed in the buildings. And, in the light of Covid, the importance of retaining greenspace within settlements for visitors should be clearer than ever before.

Category

1. Loch Lomond and Trossachs

Tags

1. climate change
2. Development Plan
3. flamingo land
4. LLTNPA
5. planning
6. Tourism

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