

## Flamingo Land's Mark II planning application at Balloch (5) - Traffic and the carbon implications

### Description

In my first post on the revised Flamingo Land Application last September ([see here](#)) I referred to the submission Ian Cowan (an environmental and planning law consultant) had made on behalf of Ross Greer which contained a forensic analysis of some of the gaps and contradictions in the application including the proposals for parking. I will not repeat that analysis here but it showed Flamingo Land's numbers did not stack up.

While numbers are important, this and a second post will also consider the issues behind them. They will take a look not just at the additional traffic that is likely to be generated and the parking required but how this is likely to impact on the Loch Lomond and Trossachs National Park Authority (LLTNPA)'s aspiration to reduce carbon emissions and on residents, businesses and outdoor recreation in the village of Balloch.

### Transport Scotland & West Dunbartonshire Council Roads position on the development

Road safety and traffic impact assessments are a standard part of development planning and the authorities responsible for roads are consulted by Planning Authorities as a matter of course. Both Transport Scotland, responsible for the A82 and the strategic transport network, and West Dunbartonshire Council (WDC), responsible for the roads and parking in the village responded quickly to the application. Surprisingly neither response had anything substantive to say about the traffic and parking implications of what is a major development.

TransportScotland ([see here](#)) said nothing at all, they just ticked a box labelled "The Director does not propose to advise against the granting of permission". Road transport is responsible for much of our carbon emissions but despite the Scottish Government's commitment to reduce those emissions, TransportScotland appears unconcerned about the likely impact of Flamingo Land on this let alone atmospheric pollution.

One might have at least hoped they might have commented on the Transport Assessment conducted by Flamingo Land which implies the development will have little impact on the trunk road network. This will come as a surprise to anyone who has tried to use the A82 regularly at peak periods like Bank Holidays. Southbound traffic can snarl up from Dumbarton back to Luss and beyond with pinch points at places like Cameron House where vehicles try to join the main road. It should be obvious that creating a major visitor attraction at Balloch will impact on those problems so why hasn't TransportScotland commented? The answer (see below) is they appear to be party to the assessment although nowhere is this stated in their response.

West Dunbartonshire Council roads services response was not much better, most of the tick boxes on their standard form were left blank, except those which stated they had no objection and required no further information on the traffic or parking implications. There was, however, some information in an

appendix:

APPENDIX

Item Ref	Comments
1a	The scale and scope of the revised application is very similar to the previous submission. As agreed with WDC Roads Services, the original Transport Assessment was used to model anticipated trip generation for the new application, as the new application was being developed during the Pandemic which had lower background traffic levels. However, in order to provide robustness, an additional survey was undertaken to gauge existing traffic levels. As this was lower than the original survey, this evidence backed up the assessment.
1e	A Travel Plan should be produced encouraging other modes of transportation with suitable incentives (e.g. bus / rail fare included in cost of advance tickets, enhanced cycling and walking routes to and through the site etc)
3b	Parking should conform to WDC Parking Standards for the location, types and scale of facilities to be provided. Sufficient EV charging points should be provided (ducting for others) and disabled parking to NRDG proportions. Cycle parking should be provided at suitable locations throughout the site with potential for Ebike charging points.

It appears from this that WDC did not check whether the various numbers quoted in Flamingo Land's application for increased traffic and parking added up but simply accepted them.

Like TransportScotland, WDC road appear to have little idea we are in a climate emergency - what does 'sufficient EV charging points' mean? and no concern about what impact the development might have on parking by local residents and businesses.

In effect through their responses TransportScotland and WDC roads dumped all responsibility for looking at the traffic and parking implications of the development to the LLTNPA. That neither had done their job properly was confirmed in the letter the LLTNPA sent to Flamingo Land's agents on 17th November 2021.

**Traffic and Transport**

- viii. Clarification of the proposed car parking quantum; in particular, whether the stated quantum (ref. Tables 6.1 and 6.2 of the Transport Chapter of the EIA Report) has taken account of the pool/waterpark in addition to the separate quantum required for the 60-bed hotel (assuming this facility will be open to and visited by the wider public and not just hotel guests).
- ix. Clarification that the 'Pierhead woodland parking' area will be sufficient to accommodate the proposed additional boat/trailer parking for Lomond Banks guests in addition to the hotel/waterpark.
- x. Information to indicate that the brown shaded areas on the parameters plan are sufficient to accommodate the quantum of parking required without encroachment into areas reserved for woodland.

and parking:

development including traffic

- xi. Please highlight the anticipated post-development uplift in vehicle numbers in absolute/number of vehicles terms:
- a. For vehicles entering and leaving Balloch as a whole;
  - b. At Ben Lomond Way (noted as a 33% increase);
  - c. Old Luss Road (North) (noted as 84% increase) and;
  - d. Pier Road (noted as a 29% increase).

Please provide a clear, layperson's explanation of when and for how long the uplift will be experienced (i.e., weekday/weekend, peak hour maximum or averaged across the day etc.) and how it will be experienced (i.e., will there be any increased delay or queuing?). It is important for the timing and duration of the main traffic impacts to be explained in relatable terms that can be understood by the public and this should be incorporated within the EIA NTS.

Quantum is just jargon for amount

Stantec, the agents for Flamingo Land, have not yet replied to that.

## Illustration of flaws in the Transport Assessment

The original Transport Assessment conducted on behalf of Flamingo Land and referred to by WDC in their response took place in 2017. Rather than requiring a full new assessment, WDC asked for a limited new survey to check the applicability of the previous data. When the repeat survey purported to show that traffic in Balloch had dropped, WDC roads endorsed the 2017 survey as a suitable basis for taking planning decisions.

The drop in car numbers may come as a surprise to people who visited the village post lockdown but there is a good explanation for this, the new traffic surveys were not comparing like with like and don't provide data for holiday periods. This is explained in the revised Transport Assessment (Vol 2 Appendix 12.1 to the Environment Impact Assessment [\(see here\)](#))

## Traffic Surveys

- 7.1.3 To determine the existing traffic conditions on the study network, a series of Junction Turning Counts (JTCs) were undertaken over Thursday 6 September 2017 and Saturday 9 September 2017 at all junctions noted below and as per the Survey Specification agreed with WDC, included as **Appendix B**.
- 7.1.4 In addition, to help inform the traffic impact assessment and the requirement for a noise and air quality assessment to support the Environmental Assessment, a seven-day Automatic Traffic Count (ATC) survey was undertaken from Thursday 6 September 2017 to Wednesday 12 September 2017 inclusive, to record existing traffic link flows, vehicle composition and traffic speeds.
- 7.1.5 Whilst the survey data referenced above was taken for a neutral month assessment, survey data was also gathered in August 2017 (w/c Thursday 10<sup>th</sup> August 2017 to Wednesday 16<sup>th</sup> August 2017, inclusive) during the school summer holiday period. This was to provide traffic data for a sensitivity assessment, should it be required at key pinch points on the network, subject to the neutral month assessment. It was agreed with WDC and TS, however, that mitigation would not be provided for a summer season assessment given the industry standard premise that it is generally not appropriate to design and build for a non-neutral assessment scenario.
- 7.1.6 Following discussion with WDC Roads Officers, additional surveys were undertaken on two junctions in November 2021 to check the validity of the extensive 2017 surveys. A comparison of the two sets of traffic flows was presented in a Technical Note (TN) and issued to WDC, included as **Appendix C**. The TN confirmed that the 2017 survey flows were higher than the 2021 flows in both the morning and evening peak period. The 2017 traffic surveys have therefore been used as the basis for the traffic impact assessment.

While the original survey was for early September, still the holiday season, the repeat survey was in November and the second half of the month at that.

### Junction 2 - Weekday Peak Hours Comparison

- 2.3. Flow diagrams for the morning and evening peak hours for Junction 2 are shown in the appendices. **Figure 1.1** and **Figure 1.2** shows the peak hour flows for the 2017 surveys and **Figure 1.3** and **Figure 1.4** shows the peak hour flows for the 2021 surveys. The nett difference for the morning and evening peak hours are shown in **Figure 1.5** and **Figure 1.6**. A summary of the total traffic flows through Junction 2 for both surveyed years is shown in **Table 2**.

Table 2: Junction 2 – Peak Traffic Hour Flow Comparison

Date of Survey	Total Vehicle Traffic Flows – Junction 2	
	AM Peak Period (0800-0900)	PM Peak Period (1630-1730)
Thursday 18 <sup>th</sup> November 2021	1,830	2,149
Thursday 7 <sup>th</sup> September 2017	2,006	2,362
Nett Difference	-176	-213

The only surprise for a village which attracts traffic in the holiday season is the drop wasn't even bigger! In terms of the validity of the survey, it is also worth noting there was no comment about the

weather on either day which could also impact on the results.

The other key point to note is that WDC and TS both advised Stantec (para 7.1.5) they should focus their surveys on non-peak periods to provide a "neutral" assessment according to industry standards, ie an indication of mean traffic travels during the course of the year. That approach is far from "neutral". For people trying to get to Balloch or living there, it is peak periods of the holiday season which is what matters. What happens outside the tourist season is irrelevant if the village is gridlocked and has insufficient parking at peak periods: two months of traffic hell is not compensated for by the ten months of the year the roads have sufficient capacity. The LLTNPA planners have rightly asked for STANTEC to clarify the impact of increased traffic on delays and queuing.

The Transport Assessment, which is 40 pages, is accompanied by over 160 pages of data from traffic surveys which appears to be of dubious worth. What one can say, however, is that the proposals from Flamingo Land to create 393 new parking places suggest they anticipate a considerable increase of traffic to the village.

## **NPF4, traffic reductions and the Flamingo Land development**

In January the Scottish Parliament approved a new planning framework for Scotland, National Planning Framework 4, and earlier this week, on 13th February, this was adopted by Scottish Ministers and replaces previous guidance. The LLTNPA had delayed replacing its Local Development Plan (LDP), 2017-21, which was used to evaluate all planning applications in the National Park, on the grounds that it needed to align with the new national planning framework. What the adoption of NPF4 means is succinctly summarised on the Scottish Government website ([see here](#)):

*"The statutory development plan for any given area of Scotland consists of the National Planning Framework and the relevant local development plan(s)."*

With its LDP so out of date, the LLTNPA's primary reference point for evaluating Flamingo Land's development proposals at Balloch is likely to be NPF4. This puts the reduction of the climate and nature emergencies at the centre of the planning system, starting with Policy 1:

*"When considering all development proposals significant weight will be given to the global climate and nature crises"*

Hence why the very last point of LLTNPA's letter to Flamingo Land asking for further information on 17th November was to request an assessment of their proposals in the light of NPF4.

Under Sustainable Places NPF4 goes on to state:

*"Scotland's Climate Change Plan, backed by legislation, has set our approach to achieving net zero emissions by 2045, and we must make significant progress towards this by 2030 including by reducing car kilometres travelled by 20% by reducing the need to travel and promoting more sustainable transport."*

Whereas NPF4 is aiming for a reduction of car traffic by 2030, Stantec in the Environmental Impact Assessment carried out by Stantec for Flamingo Land first assumes that traffic will have increased by 2030 over the levels they recorded in 2017:

“A year of opening assessment of 2030 was based on all development being operational in accordance with Transport Assessment Guidance 2012. . Given the time between the traffic surveys carried out in 2017 and a year of assessment of 2030, a factor was applied to the 2017 surveys to reflect an increase in traffic over a period of 13 years.”

The Transport Assessment Guidance is very out of date and no longer fit for purpose but it resulted in this revised baseline for 2030:

**EIA Report Volume 1**  
**Lomond Banks, Balloch**

Table 12-5. 2017 / 2030 AADT Base Flows

Location	Two-Way Flows (All Vehicles)		2017
	2017	2030	
A811 (East of Stoneymollan Roundabout)	16,542	18,808	9%
Old Luss Road (South)	9,375	10,660	7%
Ben Lomond Way	2,661	3,025	10%
Balloch Road (South)	4,958	5,637	8%
Pier Road	292	332	10%
Balloch Road (Balloch Bridge)	4,070	4,628	23%
Stirling Road (A811)	6,009	6,833	19%
A813 Carrochan Road (South)	8,079	9,186	7%
A811 (Lomond Bridge)	12,777	14,527	9%
Luss Road	12,427	14,130	9%
A82 (North of Stoneymollan Roundabout)	20,090	22,842	12%
Old Luss Road (North)	242	275	13%

On the more frequented roads that is an increase of over 10% from 2017 levels. Then, on top of this increase, the Environmental Impact Assessment predicted the development would generate the following vehicle journeys each day:

12.6.4 The flows represent the number of external trips generated by the site and do not include any reductions for internal trips i.e. trips shared between different land uses and working and living within the site.

Table 12-6: Estimated Number of Two-Way External Development Daily Trips

Development	Two-Way Daily Vehicular Flows	
	Weekday	Weekend
West Riverside & Woodbank House	1,433	1,958

This is estimated to result in the following increases to traffic on the local road network:

12.6.5 Table 12-7 below provides a summary of the potential changes in traffic network once the proposed development is fully operational.

Table 12-7: 2030 AADT With Development Flows

Location	Two-Way Flows (All Vehicles)	HGVs
A811 (East of Stoneymollan Roundabout)	19,841	9.4%

Old Luss Road (South)	12,060	5.6%	13%
Ben Lomond Way	4,038	7.7%	33%
Balloch Road (South)	6,239	7.2%	11%
Pier Road	427	8.3%	29%
Balloch Road (Balloch Bridge)	5,268	21.3%	14%
Stirling Road (A811)	7,002	17.4%	2%
A813 Carrochan Road (South)	9,341	7.2%	2%
A811 (Lomond Bridge)	14,640	9.5%	1%
Luss Road	14,353	8.6%	2%
A82 (North of Stoneymollan Roundabout)	23,336	11.6%	2%
Old Luss Road (North)	506	13.5%	84%

Combine the two projected increases and traffic on the A811 into Balloch from the Stoneymollan roundabout is projected to increase by 30% when the Scottish Government is looking for a 20% reduction across Scotland!

While one could question how 393 new parking spaces will be sufficient to deal with this increase in trips, if the LLTNPA approve them they are likely to blow any chance they have of meeting the Scottish Government's targets by 2030. Reducing car use in rural areas by 20% is going to be hard enough without the LLTNPA having to compensate for an influx of cars to the so-called gateway to the National Park which is better served by public transport than any other settlement.

Both Transport Scotland and WDC Roads knew this because the 20% car reduction target was included in Scotland's revised Climate Change Plan 2018-32 when it was revised in December 2020 and should have advised Stantec accordingly. It makes their "non-responses" to the planning application even more culpable.

## **So how do Flamingo Land's transport proposals measure up to the policies in NPF4?**

While the traffic reduction target is given prominence in NPF4, it is not framed as a planning policy as such because that would, for example, stop new housing developments where some increase in traffic is unavoidable. There are, however, a number of policies under the Tourism and Sustainable Transport chapters of NPF4 which appear designed to stop the sort of development proposed by Flamingo Land in its application for Planning Permission in Principle (PPiP), for example:

- 1) *Policy 30 Proposals for tourism related development will take into account:*
- iv. *Opportunities for sustainable travel and appropriate management of parking and traffic generation and scope for sustaining public transport services particularly in rural areas;*
  - vi. *Measures taken to minimise carbon emissions;*

13 d) *Development proposals for significant travel generating uses will not be supported in locations which would increase reliance on the private car, taking into account the specific characteristics of the area.*

**Comment.** Flamingo Land's proposals will increase traffic and, by doing so unnecessarily, won't do anything to wean people off their cars and onto public transport. For example, the clear assumption is that the people staying in the 105 accommodation units at Woodbank House up the hill will do so by car as there are NO proposals to transport people there from Balloch Station or the pierhead by bus.

- 2) *13 e) Development proposals which are ambitious in terms of low/no car parking will be supported, particularly in urban locations that are well-served by sustainable transport modes and where they do not create barriers to access by disabled people.*

**Comment.** The plans contain no proposals to reduce car travel through car parking and use parking standards agreed before the declaration of the climate and nature emergencies.

- 3) *13f) Development proposals for significant travel generating uses, or smaller-scale developments where it is important to monitor travel patterns resulting from the development, will only be supported if they are accompanied by a Travel Plan with supporting planning conditions/obligations. Travel plans should set out clear arrangements for delivering against targets, as well as monitoring and*

evaluation.

**Comment.** The EIA contains one paragraph about a Travel Plan which reads as follows: *“Contained within the Transport Assessment an Outline Travel Plan incorporates actions and incentives and an ongoing programme of delivering sustainable travel options for the proposed development site. This includes several potential measures which could be implemented to support sustainable travel choices for future employees, through both induction processes and provision of a travel information pack for new starts. This would also include the provision of a Residential Travel Information Pack for the residential component of the site, which will be issued at point of occupation.”*

Flamingo Land want to create a service area, Area 10 in the application, in ancient woodland which will contain no less than 35 parking spaces for staff and services! As for the Residential Travel Information Pack it appears it will be issued once visitors have arrived... in their cars!

4) 13g) *Development proposals that have the potential to affect the operation and safety of the Strategic Transport Network will be fully assessed to determine their impact. Where it has been demonstrated that existing infrastructure does not have the capacity to accommodate a development without adverse impacts on safety or unacceptable impacts on operational performance, the cost of the mitigation measures required to ensure the continued safe and effective operation of the network should be met by the developer.*

**Comment.** Having stated that the traffic surveys were conducted in neutral periods the EIA does, to Stantec's credit, in discussing road accidents in the local area make a comment which indicates the likely impact of the development on the road network at peak times:

*“A82 (North of Stoneymollan) two serious incidents reported on the approach from the north to the Stoneymollan Roundabout, albeit more remotely.*

*This section of route is notorious for queuing and delay as a result of exceptionally heavy traffic volumes, which may have contributed to the incidents and propensity for occurrence in this location.”*

The Sustainable Transport chapter of NPF4 also includes a number of policies designed to promote use of public transport and active travel rather than cars. Flamingo Land's proposed development does little to promote these aspiration apart from incorporating the existing long distance walking and cycling routes into the development:

## EXISTING ACCESS AND MOVEMENT CONDITIONS; THE WIDER BALLOCH AREA



While the bus routes are not shown, Balloch is well served by walking and cycling routes

What the Planning Application lacks are meaningful proposals to shift the number of visitors who are likely to arrive by car as promoted by the policies in NPF4. For example:

- 5) 13 a) *Proposals to improve, enhance or provide active travel infrastructure, public transport infrastructure or multi-modal hubs will be supported. This includes proposals:*
- i. *for electric vehicle charging infrastructure and electric vehicle forecourts, especially where fuelled by renewable energy.*

**Comment:** there are no details in the PPIp

- ii. *which support a mode shift of freight from road to more sustainable modes, including last-mile delivery.*

**Comment.** The large service block in area 10 appears entirely served by vans/lorries

The PPIp also lacks detail about how existing infrastructure will be improved as suggested in Policy 13b of NPF4:

- There is nothing on the potential to improve public transport. For example if the development had been designed around visitors arriving by train, not car, those numbers could have been used to justify an improved train service to Balloch;

- The proposed monorail from near the station to the pierhead area appears designed as a tourist attraction, no doubt with prices to match, rather than an extension of the public transport system designed to make the Pierhead Area and Loch Lomond shores more accessible (small electric buses or buggies, as seen on the continent, would do that far more effectively);
- There is no mention of where people cycling to the various lodges can store their bikes that I can see or where electric cycle charging points will be located;
- Traffic on site will increase contrary to the aspiration of NPF4 to create safer *crossings for walking and wheeling and reducing the number and speed of vehicles*;

## **Discussion transport, green tourism and Balloch**

Setting aside for now arguments about the scale of Flamingo Land's proposed development and the impact this would have on the natural environment and local community, Balloch has considerable potential to act as a green gateway to the National Park. What this would require, however, are improved train connections (e.g. every 20 minutes instead of half hourly), good bus connections onwards up either side of Loch Lomond (almost non-existent) and facilities designed to appeal to cyclists and water sports enthusiasts in particular. It would also require active measures to discourage visitors arriving by car.

That sort of vision for Balloch would be supported by NPF4 but Flamingo Land's current application for PPIP will do little or nothing to deliver it. Instead the application assumes increased traffic, with all the harms which that causes. There is no need for this. There are tourist resorts on the continent, such as Zermatt in Switzerland, that can only be accessed by public transport or active travel and they work very successfully.

The problem for any future development in Balloch, whether by Flamingo Land or not, is that the village is already swamped by traffic and its spaces dominated by car parks. Until that is tackled, the potential to create a green development will be highly constrained as visitors can always decide to brave the traffic chaos knowing that there will be somewhere to park. It is almost impossible to control this which is what has led Loch Lomond Shores objecting to Flamingo Land's PPIP: it is concerned their customers will fill up its car parks. What is needed is a green transport plan for Balloch as a whole but that cannot be done by a single developer, it requires co-ordinated action from our public authorities.

The LLTNPA should have every reason to reject Flamingo Land's application for PPIP on the grounds of the traffic implications alone but until it stops being reactive, takes a lead and starting acting like a National Park the transport aspirations of NPF4 as they should apply to Balloch will never be delivered. My next post will look at the implications of Flamingo Land's proposals for new car parks within the context of Balloch as a whole and the needs of its residents, businesses and visitors.

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

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

**Date Created**

February 15, 2023

**Author**

nickkempe

*default watermark*