



Loch Lomond & the Trossachs National Park
Carrochan
Carrochan Road
Balloch
G83 8EG

18th June 2018

Dear Ms Emery,

Application: 2018/0133/PPP

Proposal: The erection and operation of a tourism and leisure led mixed use development including hotel, bunkhouse accommodation and self-catering holiday lodges; self catering boathouse accommodation; residential development; leisure and recreational facilities including swimming pool, water park, visitor reception and education/interpretation facilities; hot food/café restaurant uses; brewery; ancillary uses including retail; façade retention of Woodbank House and conversion of existing outbuildings; public realm enhancements including public square improvements, footpaths and cycleways; external activity areas including forest adventure rides, tree top walkway, monorail, events/performance areas, picnic areas and play areas; staff and service areas; landscaping; new access from Ben Lomond Way and Pier Road; and site development infrastructure (including SUDS, and parking). | Land At Pier Road, Ben Lomond Way And Old Luss Road, Known As West Riverside And Woodbank House, Balloch.

The Woodland Trust is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK covering around 24,000 hectares (59,000 acres). In Scotland we own and manage over 60 sites across 9,800ha which include the 5,000ha Glen Finglas estate. The Woodland Trust has 500,000 members and supporters.

We consider that any woodland included in Scottish Natural Heritage's Ancient Woodland Inventory (or AWI), which is present on historical maps or which exhibits a significant number of ancient woodland indicators can be considered as ancient and long-established and is therefore worthy of further study and is likely to pose a constraint on development. We believe that ancient woodland is amongst the most precious and biodiverse habitats in the UK and is a finite resource which must be protected from damage, loss and fragmentation.

The Woodland Trust **objects** to the proposed development on the grounds of potential damage and detrimental impact to three areas of woodland recorded as 2b LEPO (Long Established woodland of Plantation Origin) on Scottish Natural Heritage's Ancient Woodland Inventory (AWI). The woodlands impacted by this development are as follows:

- Drumkinnon Wood at grid reference (NS386821)
- an unnamed woodland at grid reference (NS382818)
- an unnamed woodland at grid reference (NS383822)

The Woodland Trust
Scotland
South Inch Business Centre
Shore Road
Perth
PH2 8BW
Telephone
01738 635829
Facsimile
01738 629391
Website
woodlandtrust.org.uk

The Trust has previously raised concerns regarding the Planning Application Notice (2017/0331/PAC) for this development, and still holds significant concerns about the direct loss of woodland recorded on the AWI.

Policy

Scottish Planning Policy states:

“216. Ancient semi-natural woodland is an irreplaceable resource and, along with other woodlands, hedgerows and individual trees, especially veteran trees of high nature conservation and landscape value, should be protected from adverse impacts resulting from development. Tree Preservation Orders can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest.”

“218. The Scottish Government’s Control of Woodland Removal Policy includes a presumption in favour of protecting woodland. Removal should only be permitted where it would achieve significant and clearly defined additional public benefits. Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the Control of Woodland Removal Policy, and this should be taken into account when preparing development plans and determining planning applications.”

Loch Lomond and the Trossach’s National Park’s Local Development Plan 2017-2021, Natural Environment Policy 8 states: “Development proposals will not be supported when it would result in the loss or deterioration of an ancient or long-established plantation or semi-natural woodland unless there are overriding public benefits from the development that outweigh the loss of the woodland habitat.

Development proposals will not be supported where it is likely to lead to the loss of, or damage to, important individual trees, hedgerows or groups of trees or woodlands that contribute to local amenity, the character of the area and/or are of nature conservation value or historic significance. Where development is accommodated, compensatory planting is to be undertaken to contribute to the National Park’s Biodiversity Action Plan. Where trees, hedgerows or woodlands may be potentially affected by development or land use change, the following measures may be required on a case by case basis:

- a) Provision for the protection, management and planting of new trees, hedgerows and woodlands in keeping with distinctive landscape character of the area and where possible enhancing existing or creating new wildlife habitat;
- c) Control of Woodland Removal Policy (Scottish Government) to assess acceptability of woodland removal and need for associated compensatory planting
- d) Management agreements and/or legal agreements to encourage positive management of trees, hedgerows and woodlands on or adjacent to development sites.”

Impacts of the development

The Woodland Trust is concerned about the following impacts:

- **Direct loss** of woodland recorded on the AWI to facilitate this development.
- Intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.
- Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
- Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
- Development provides a source of non-native plants and aids their colonisation.

Any effect of development can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

Development in long established woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts would occur as a result of the removal of the woodland, which contains valuable habitat, to make way for the construction of this proposal.

Creation of new areas of woodland or buffer zones around semi-natural habitats will help to reduce and ameliorate the impact of damaging edge effects. Buffers are landscape features designed to protect a sensitive area from the impacts of development. These may be planted with trees or shrubs or simply be an area of land on which the development is not allowed to encroach, i.e. a grassy strip.

In order to provide appropriate protection for the woodlands affected, the buffer in this case should be a **minimum of 50m** between the development and all areas of 2b LEPO woodlands. This should be made up of at least 50% tree cover, planting this area if necessary. This will help to protect the woodlands from the impacts of the adjacent development.

Conclusion

In summary, the Woodland Trust **objects** to this application on the grounds of direct loss and disturbance to both the two unnamed woodlands at grid references NS382818 and NS386821 respectively, as well as Drumkinnon Wood. This application contravenes both national and local planning policy and should be considered for refusal.

We hope our comments are of use to you; if you wish to discuss any of the comments raised, please do not hesitate to get in touch.

Yours sincerely,

Nicole Hillier
Assistant Campaigner – Ancient Woodland