



Flamingo Land Ltd
c/o Steve Callan
Stantec UK
Lomond House
Floor 5
9 George Square
Glasgow
G2 1DY

17 November 2022

Dear Steve

Application Number: 2022/0157/PPP
Development Proposed: Erection and operation of a mixed-use tourism and leisure development including refurbished tourist information building; up to 60-bedroom apartment hotel; up to 32-bedspace budget hotel, up to 127 no. self-catering holiday lodges; restoration and redevelopment/conversion of Woodbank House and attendant listed structures for up to 21 self-catering holiday apartments (subject to other necessary consents); leisure pool, waterpark, spa; restaurants, hot food cafe and retail areas; craft brewery including pub; visitor reception area and hub building; external activity areas including areas for event and performance, play, picnic and barbeque; monorail; staff service and welfare accommodation; transport infrastructure; associated access and parking; landscaping and utilities infrastructure works
Location: Land At Pier Road, Ben Lomond Way And Old Luss Road, , Known As West Riverside And Woodbank House (Lomond Banks) Balloch,

Request for supplementary information in accordance with Regulation 26(2) of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regs) and Regulation 24 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (2013 Regs)

I refer to Application 2022/0157/PPP which was validated on 25 May 2022. Following my assessment of (1) the Application, EIA Report and supporting plans and documents and (2) consultation responses and representations thereon, under Regulation the EIA Regs (and the 2013 Regs) I am formally requesting from you, supplementary information which I consider is directly relevant to enabling the Planning Authority to reach a reasoned conclusion on the significant effects of the proposed development on the environment. Please submit the following supplementary information as soon as possible:

- i. An Addendum to the **EIA Report** as may be necessary in consequence of the matters highlighted in this letter; specifically, please include the '**LVIA Visual Representations**' submitted on 03 Aug 2022.

LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

National Park Headquarters, Carrochan, Carrochan Road, Balloch, G83 8EG Long: 4°34'24"W Lat: 56°00'12"N

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- ii. A replacement and compliant **EIA Non-Technical Summary** (EIA NTS) that fully satisfies the requirements of Regulation 5 (2)(e) and Paragraph 9 of Schedule 4 of the EIA Regs.
- iii. A summary table within the replacement and compliant EIA NTS expressly highlighting the 'receptors' the 'pre-mitigation significance of effects', the 'mitigation' proposed and the 'post-mitigation (residual) significance of effects' for all chapters of the main EIA Report.
- iv. A revised **Parameters Plan** amended as necessary having regard to the matters highlighted in this letter and in relation to the following:
 - a. Clarification of the proposed parking quantum (paying close attention to sub-totals).
 - b. Clarification in relation to the location of the 35 parking spaces for the 'staff and services area' (this is presently suggested as being within the brown shaded areas within the key and not expressly within Area 10).
 - c. Zone D(11) - confirmation that the extent of the shaded area aligns with the 12m buffer width stipulated in the key (amend as necessary).
 - d. Include maximum height parameter and floor area for the Apart Hotel and Waterpark in the key.
 - e. Include the proposed pedestrian/cycle connection through the Woodbank House site to the Upper Stonemollan Road/ John Muir Way (providing the mitigation referenced in Para 12.6.11 of the Transport Assessment).
 - f. Clarification of the route of the John Muir Way through Zone B.
 - g. Zone E - areas shaded dark green and given reference no. 13 missing from the key.
 - h. Inclusion of the blue areas (assumed to be SUDS) in the key (or otherwise please remove).

Trees and Woodland:

- v. Information to further help understand and substantiate the figures in Table 6-9 para 6.8.5 of the EIA Report (Volume 1) as it is not clear upon what basis the figures have been derived. We suggest a spatial plan (or plans) clearly showing and quantifying:
 - a. The areas of proposed woodland loss and retention (informed by areas of proposed development); and
 - b. The areas of proposed woodland net gain overlaid with the proposed development;
 A composite plan would help draw together the background sources of information, more clearly articulate the impact of the proposed development on woodland and how the impact is proposed to be mitigated.
- vi. Review both the character and physical extent of the area of woodland at Woodbank House identified as B2 (Appendix 06.1 EIA Report Vol. 2) to ensure alignment with the submitted ecology and arboricultural reports along with the NWSS and National Forest Inventory maps.
- vii. Area 10 - clarify whether there will be 'clear felling' or 'targeted tree loss' in this area and any consequent adjustment (or otherwise) in the overall woodland net loss/gain calculations presented within the EIA Report.

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.

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- 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 queueing?). 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.

Other

- xii. Clarification of how the EIA Report has assessed the significance of the effect of development on Woodbank House (LB1125). Para 13.6.2 of the EIA Report (Archaeology and Cultural Heritage) refers to development of 16 'woodland lodges' and not the 30 proposed. The stated location of the proposed 16 woodland lodges is to the west and northwest of the Stables (HA4). It appears the balance is located to the immediate west (I.e., in the backdrop) of LB1125 – but it is not clear whether the EIA Report has properly assessed the extent of development in this location and any mitigation. Also please provide Appendix B referred to in the same para.
- xiii. Please clarify the proposed approach to the routing of the John Muir Way though Zone B. The Transport Section of the EIA Report indicates that this is to be retained yet the existing routing is not allowed for on the Parameters Plan. The impact of any alternative routing on woodland must be reassessed accordingly.
- xiv. Confirmation that no residential development is now proposed as enabling development for the listed structures at Woodbank House (please remove all such references from the Design and Access Statement and EIA documents).
- xv. Under Reg EIA Regs 26(4) noting the strong pattern of seasonal traffic variance within Balloch we request that you verify that the timing (year and month) of the traffic assessment survey work is an appropriate basis for assessment. Please provide further or additional evidence in support of your response. We are also seeking the further assistance of West Dunbartonshire Roads Authority in relation to this point.
- xvi. Please provide a detailed assessment this proposed development against the revised draft NPF4 which was laid before the Scottish Parliament on 8 November 2022. This is in anticipation that the National Park Authority will be required to assess the application against the NPF4 to be approved by Parliament.

Please note that in accordance with Reg 27 of the EIA Regs, Regs 20 to 22, 24 and 25 apply to the provision of this supplementary information as they applied to the submission of the EIA Report. Therefore, the supplementary information provided by you will require to be subject to formal notification, consultation and publication. You must comply with Reg 25. In the interests of efficiency and avoiding misunderstandings, we would only wish to undertake this exercise on one occasion and so we must insist that all submissions of supplementary information are clearly set out and indexed (and cross referenced to this letter) as a single and easy to follow comprehensive package (Addendum).

Please upload your submissions using the planning portal [ePlanning Scotland](https://www.eplanning.scotland.gov/) wherever possible or otherwise send by email to planning@lochlomond-trossachs.org. Please note that the supplementary information will need to be supplied in hard copy (2 copies) to the address below.

I look forward to receiving this information to enable me to progress your application.

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Yours sincerely,

Caroline Strugnell
Planning Officer

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