

Appendix 5

Green Party Website Form and Template Letter

National Park Authority Special Board Meeting West Riverside and Woodbank House

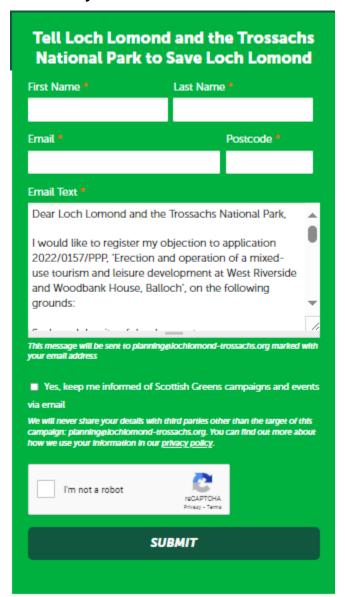
16 September 2024

Paper for decision

Contents

Green Party Website Form	2
Green Party Template Letter Text	3

Green Party Website Form



Green Party Template Letter Text

Dear Loch Lomond and the Trossachs National Park,

I would like to register my objection to application 2022/0157/PPP, 'Erection and operation of a mixed-use tourism and leisure development at West Riverside and Woodbank House, Balloch', on the following grounds:

Scale and density of development

The overall site is much more than the sites VE1 and VE4 designated in the National Park's local plan for 'visitor experience'. Areas 7, 4b and 3c on the applicant's plans are areas not designated for such a use.

This includes areas intended for the boathouse and "hard landscape public realm" around the shore of Drumkinnon Bay. This is a very significant deviation from the National Park's Local Development Plan and is a much larger development than implied in the LDP.

Visitor Experience Policy 2 says that "New tourism development will enhance the visitor experience of the National Park and offer a bespoke and high quality product", but the application offers very little that is bespoke in nature, and consists of broadly the same elements of the applicants' previously withdrawn application compressed into a smaller area.

The positioning of the hotel/water park complex on the shore of the Loch will add to the overdevelopment of the shorefront.

Natural Environment Policy 1 requires that "Development will protect the special landscape qualities of the National Park" and proposals will have to "be sympathetic to their setting and minimise visual impact", yet the Landscape and Visual Impact Assessment concludes that the Site itself would experience major adverse localised landscape and visual effects during construction work, dropping to moderate adverse during operation. This would be in breach of this policy.

Endrick Water Special Area of Conservation will be significantly affected if construction works occur while Atlantic salmon or river lamprey are present in the River Leven. In the absence of an assessment of the Proposal's implications for that site, compliant with the Conservation (Natural Habitats & Environment Policy 2.

Impact on transport/ climate change

LDP Transport policy 2 states that "All development proposals will make a positive contribution towards encouraging safe, sustainable travel and improving active travel options throughout the Park by enabling opportunities for: (a) Sustainable transport modes, based on a hierarchy of walking, cycling, public transport and motorised transport; for freight, a shift from road to rail and water-based transport where possible..." and "(c) Modal change from private car to more sustainable transport modes within settlements including the provision of integrated new or improved transport infrastructure".

The National Park's Sustainable and Active Travel Policy states that "We can no longer adopt a 'predict and provide' approach to private transport and there needs to be a definitive shift to more sustainable modes".

This development will not make 'a positive contribution towards modal change'. instead it will inevitably add to the number of cars on local roads, including the frequently congested A82. While there are minor welcome measures mentioned within the plans to encourage use of public transport and active travel, the overall impact of self-catering accommodation with parking is inevitably going to be a net increase in car journeys. It is simply not good enough for the developers to expect the National Park, West Dunbartonshire Council and other stakeholders to cancel this impact out. In this respect the development is fundamentally unchanged from its previous iteration, for which increased traffic levels was a key area of local concern.

The increase in car journeys this development would generate is contrary to Scotland's statutory climate change targets and the need for public bodies including the National Park to play a role in achieving them. The impact of development would also undermine the Scotlish Government's target of reducing car kilometres by 20% by 2030.

Restriction of leisure space/access

The national park's Overarching Policy 1 states that "[Development must ensure] areas of open space are of high quality, appropriate to the needs of the local community", but these proposals would lead to a loss of informal open space in the West Riverside area for use by the local community and visitors alike.

The Proposal fails to "safeguard visual amenity and important views", to "avoid any significant adverse impacts", to "protect biodiversity", or to "support public transport use over car use", as required by the Park's Overarching Policy 2. Even if Flamingo Land do all they can to "safeguard access rights", as they promise, the density of holiday lodges on large parts of the site will inevitably disrupt public access to those parts.

Further, the Transport Policy 2d states that "Former railway lines should be safeguarded to provide walking, cycling and bridleway opportunities". The former railway line on this site is currently mainly open space which is fully accessible for leisure purposes, but it would in its entirety become part of a holiday lodge park, with a pathway routed further east.

Finally, the development is clearly contrary to Open Space Policy 2 which states that "Development on formal and informal open space (both inside and outside of towns and villages) in public or private ownership will generally not be supported unless it can be demonstrated that... the open space is not of community value and has no other multifunctional purposes such as cultural, historical, biodiversity or local amenity value". The level of community objection to these plans over many years should make it very clear to the National Park Authority that residents consider the existing open space to be of good amenity value. This is obvious to anyone who has spent time in the area either as a resident or visitor.