



2<sup>nd</sup> September 2019

Vivien Emery  
Loch Lomond and The Trossachs National Park Authority  
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Dear Vivien,

**Application ref 2018/0133/PPP: The erection and operation of a tourism and leisure led mixed use development on land at Pier Road, Ben Lomond Way, West Riverside and Woodbank House (West Riverside and Woodbank House)**

On behalf of the Friends of Loch Lomond and The Trossachs, the independent conservation and heritage charity covering the National Park, I am writing to re-confirm our qualified support for this outline planning application. We submitted a detailed 11 page response on 23<sup>rd</sup> August 2018 with some suggestions to improve the original application which we are pleased the applicant has taken on board in revised and updated proposals.

In particular we welcome:

1. the creation of a well lit walkway beside the River Leven between the centre of the village and the Maid of the Loch. This fully accords with the wishes expressed by many hundreds of participants in the Balloch Charrette initiative;
2. the relocation of the monorail linking Station square with the Lochside along the edge of Pier Road;
3. the addition of residential flats behind the restored façade of the derelict Woodbank House with the removal of most of the houses originally planned and the addition of more high quality holiday accommodation; and
4. the slight repositioning of the proposed waterpark, visitor hub and aparthotel to safeguard the existing Lochside beach associated improvements to car parking near the Pier Head.

Having reviewed the EIA and submissions from conservation bodies such as SNH, we consider the negative impacts on conservation interests being minimal largely due to the amount of tree cover being retained and the benefits of additional planting. We are also mindful of the 'brownfield' history of most of this site which primarily consisted of extensive tracts of former industrial land with a mix of disused gravel workings, a derelict silk dye works, extensive disused railways sidings and a large static holiday caravan park with around 70 caravans.

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The recent visualisations produced by the developer help to reinforce the high quality nature of the tourist resort proposals. We commend them to the National Park Authority.

Yours sincerely,

*James Fraser*

James Fraser  
Chairman

Friends of Loch Lomond and the Trossachs



Some 30 years ago the Friends, along with the former Area Tourist Board and Dumbarton District Councillors, successfully prevented a major Cala housing development covering most of the site (excluding Woodbank House and associated land) that is the subject of this application, along with the area now covered by the Loch Lomond Shores development. Surprisingly, the planners had recommended approval of the housing scheme which Councillors subsequently refused and led to a public inquiry that determined the Councillors decision should be upheld. Had the appeal come out in favour of the developer this would have meant much of the area would now be 'off limits' to the public. The Friends invested a considerable amount of time and money fighting the housing development successfully at the public inquiry.

After the planning appeal was turned down, Scottish Enterprise was encouraged to purchase the land for comprehensive tourist and leisure development purposes as it was recognised continued fragmented ownership would result in ongoing planning blight with Balloch not realising its full potential as a tourist destination and gateway to Loch Lomond. As part of the land ownership transfer we reluctantly accepted that most of the former Silk Dye Works site would be developed for high density housing to enable the remaining parcels of ground fronting the loch and the River Leven to be released for tourism and recreation development purposes in a comprehensive way.

Prior to the current planning application being lodged we met with the developers on three occasions to discuss their outline proposals. We were subsequently pleased that following these discussions and representations by others, including the Balloch and Haldane Community Council, some elements of the scheme were dropped and access to the public beach on the loch frontage and River Leven mooring facilities was retained in the emerging scheme that is now the subject of this outline planning application.

This included the large viewing tower previously proposed near the lochshore which would have been very visually prominent from the loch and proposals for boathouse tourist accommodation on the River Leven which would potentially have displaced some of the existing and long-established local club mooring facilities. We are also pleased at the amount of public access being retained across the site and were reassured there are no plans to install gated boundaries restricting site access given the importance of the site for the public to enjoy walks and cycling close to Loch Lomond and with strategically important trails such as the Three Lochs Way and John Muir way passing through the site.

Our primary reasons for supporting the outline planning application are as follows:

- 1. The proposals are comprehensive, appropriate in scale and nature and largely in accordance with the zoning in the current and previous Local Development Plans**



The proposed development has been unfairly and inaccurately described as a theme park in many of the representations made ever since it was announced Flamingoland was the preferred developer for the land in the ownership of Scottish Enterprise on West Riverside and beside Ben Lomond Way, as well as the land in their own ownership at Woodbank House. It could more accurately be described as a blend between a larger version of a Forest Holidays woodland development and a scaled down Center Parcs resort development, but with a wider mix of tourist accommodation to suit a range of family budgets, supported by small-scale woodland attractions and much needed indoor wet weather leisure facilities and a fixed transport link between the Balloch Station Square and the leisure facilities near the lochside and Loch Lomond Shores.

We are aware as far back as the mid-1980s the first Loch Lomond Local (Subject) Plan for Tourism, Recreation and Conservation, which was prepared and adopted by a consortium of four local authorities, identified much of this site as an area with tourism and recreation development potential. This followed on from the 1949 Clyde Valley Regional Plan prepared by Sir Patrick Abercrombie that identified Balloch as the location for the development of a major West Highlands gateway tourist and recreational resort.

*Extract from newspaper coverage of the Clyde Valley Regional Plan-20<sup>th</sup> August 1949*

**Loch Lomond Pleasure Parks —Clyde Planners' Scheme.** *The value of the Loch Lomond area a recreational resort for the citizens of Clydeside is stressed in the Clyde Valley Regional Plan, published to-day. Nowhere in Great Britain is there so near to great mass of population such a magnificent area of diverse beauty, states the Planning Committee's report. In addition to the national park proposal, the committee suggest a national recreation centre should be set up at Balloch. Broadly speaking, it is envisaged that in the strip of shore extending from Auchendennan House southwards to Balloch Pier, there should be afforded a complete range of tourist accommodation from camping facilities, through youth and family hostels, to first-class hotel accommodation, each divided from the other by generous park reservations. The scheme would include all facilities and attractions, such as rest parks, open-air restaurants, boating centre, games area, and shops necessary to make this tourist centre with a universal appeal. The Loch Lomond National Park and the Balloch National Recreation Centre at the entrance to that park should be the first crystallisation in practical form of tourist facilities which could expand from this beginning to link up those many areas in Scotland capable of being made more attractive to the tourist, both native and foreign.*

More recently, Local Development Plans, including the current one, have identified West Riverside and Woodbank House for visitor experience and leisure uses while the Station Square area is earmarked for mixed use and public realm improvements.



The proposals are entirely consistent with these zonings, with the possible exception of the housing in the grounds of Woodbank House. It is accepted a modest amount of housing may be required to support some stabilisation and restoration work to the Woodbank House and to assist with other public realm works across the wider site, but we consider the scope for some additional parking should be considered for part of this site to help de-congest the core of Balloch with strengthened transport links as outlined below in more detail.

The developers have carefully thought through the mix and siting of the main elements of the development which are spread over 5 zones and they have taken account of the sensitive setting with the retention of many of the existing trees which adds greatly to the ambience and quality of the scheme. The extensive use of open public realm areas, walkway and cycle route improvements also contribute positively to the proposed development and the developer should be encouraged to strengthen this further at detailed planning application stage.

The introduction of a novel transport link between the proposed Balloch Square opposite the railway station and the proposed Lochside leisure facilities is welcome and will become a popular attraction. It will also help address the missing transport link between Balloch Railway Station, Balloch Pier and Loch Lomond Shores. However, in advance of submitting a detailed planning application we suggest the developer is asked to look again at either extending the route of the proposed monorail and/or augmenting this with the introduction of a themed/branded and more flexible land train to link the eastern and central parts of Balloch more strongly with Lomond Shores and the associated extensive car parks, including potential additional car parking on some of the land to the west in the grounds of Woodbank House.

The addition of more parking on the western periphery could help reduce the scale of parking required in the Pier Road area although it is acknowledged some parking is required near the village centre to replace the parking displaced by the proposed new Station Square and the main street townscape scheme east of the river that emerged from the Balloch Charrette.

Ideally, any land train should also cross the river and link with Moss o Balloch/Balloch Castle Country Park and the bus terminus to ensure a more comprehensive and integrated corridor transport service is provided to spread the economic benefits of the Iconic Leisure Development and improve traffic management. We suggest some further work is undertaken on this and a more strategic Balloch wide review is undertaken to ensure the full benefits of this major investment is realised. This would help to support some of the existing more fragile businesses east of the river and encourage more visitors to enjoy Balloch Castle Country Park. This could also perhaps lead to the vacant ground floor retail units in

the modern flatted development on the east side of the river coming into more productive use.

***This bolder transport west/east corridor ‘people mover’ would make a major contribution to providing more integrated transport links, improving traffic management in the Balloch area and help address some of the traffic concerns raised by objectors. We are confident this proposal can be delivered and the developers have expressed a strong interest in exploring this further as part of more detailed plans should the outline planning application be approved.***

In addition to strengthening east-west transport links, we would encourage the National Park Authority, West Dunbartonshire Council and the developers to explore the feasibility of progressing the proposed pedestrian bridge link between West Riverside and Balloch Castle Country Park. This would help realise one of the ambitions set out in the Balloch Charrette plans with many of the consultees stressing the advantages of creating a circular walk and improving the pedestrian links between the Country Park and Loch Lomond Shores. This would also provide the opportunity to visitors to the proposed new indoor waterpark and other attractions, such as a restored Maid of the Loch, opportunities to access Balloch Castle Country Park and act as a stimulus to undertake other much needed improvements in the Park.

In terms of scale, in most zones shown in the Design Solutions Parameter Plan, where tourist accommodation is proposed the density is significantly lower than the neighbouring Lomond Gate housing development and this is to be welcomed as it means there will be more green space and trees retained. The proposed timber lodge style of the self-catering holiday cabins is also welcomed and are appropriate in woodland and waterside settings.

There would be some merit in reducing the number of cabins/lodges further within close proximity of the Drumkinnon Gate housing development to provide more of a buffer zone, albeit we note it is currently proposed not to have any closer than 12 metres from the current boundary of the existing housing gardens. It should be possible still to retain around 32 cabins but with some re-positioning. Similarly, the re-configuration of some of the proposed 43 cabins on West Riverside would enable greater separation from a slightly re-positioned monorail and riverside walkway which we consider would be beneficial.

**Zone A-Station Square.** We support the plans for the proposed mix of uses and the public realm/outdoor performance space which should add greatly to the appeal and vitality of the village centre. This is consistent with some of the thinking and indicative plans that emerged from the Balloch Charrette and should complement the upgraded Sweeney’s Cruises development on the eastern flank of the square which recently received planning permission.



We welcome the inclusion of budget accommodation close to the railway station and this will help fill the gap in the market for low cost accommodation following the closure of the Loch Lomond Youth Hostel at Arden a number of years ago. There is scope to possibly enter a partnership with the Scottish Youth Hostels Association to deliver this element of the scheme.

We welcome the inclusion of a craft brewery and visitor centre for the successful and expanding Loch Lomond Brewery Company which is currently poorly sited in industrial units in the Vale of Leven. This will help to increase employment opportunities in the village centre as well as supporting the growth and expansion of a well-established local craft brewery business.

**Zone B-West Riverside.** We are supportive of clusters of self-catering lodges being developed in this area with car access to the main part of the site being excluded. However, at detailed planning application stage we consider there would be merit in investigating the potential to re-configure and re-position the lodge clusters and trying to move the main footpath and the monorail away from the central spine of the site to try and accommodate the main well-lit riverside walkway proposal which emerged strongly from the Balloch Charrette consultation. The monorail could perhaps be re-routed closer to the re-positioned riverside walkway or beside, or on, the currently underused Pier Road.

**Zone C-Pierhead.** We support the main proposals for this site as this is the logical location for the water park to make the most of the lochside setting. Previous schemes have also included a hotel but we would have some views on the detailed design and possible height of any buildings in this sensitive location and will be interested to see the plans at detailed planning application stage.

The inclusion of a visitor hub building has our support in principle too, although it is not clear what the mix of uses are likely to be and how the design will tie in with the existing Loch Lomond Shores development. There is perhaps scope to build in interpretative facilities to showcase the natural and cultural heritage of Loch Lomond which is sadly missing from the southern end of Loch Lomond following the National Park Authority's decision several years ago to close the National Park Gateway Centre at Loch Lomond Shores. The Gateway Centre was popular with school groups and other visitors. This could also tie in well with some of the proposals for the woodland area in zone D.

We accept there will be significant parking associated with the Duncan Mills slipway and the Maid of the Loch as at present and additional parking will be required to support the aparthotel. However, we consider efforts should be made to ensure there are well-integrated and frequent transport services the monorail and/or land trains linking with the bus and train stations and ,importantly, periphery areas where most



of the additional parking could be accommodated. This would be preferable to developing large scale parking in the area marked B on the plans for potential future parking.

**Zone D - Drumkinnon Wood and Bay.** The development of this area is probably the most controversial element of the outline planning application and many of the residents in the neighbouring Drumkinnon Gate housing development have been vocal in their objections. However, we are supportive of the core proposals which include a mix of low density lodges (approximately 32 according to the indicative plan) in the woodland area, a kids outdoor area and low level woodland experiences in a narrow strip beside Ben Lomond Way.

As mentioned earlier, there is perhaps scope at the detailed planning stage to relocate some of the lodges nearest the Drumkinnon Gate housing development further away to provide more of a buffer zone. The proposed kids zone and woodland visitor experiences area are well away from the housing estate and are well screened by dense tree cover and the large pipeline mound which runs from east to west through the site.

We will be interested to see more detailed attraction proposals at the next stage but welcome the emphasis on low key and imaginative facilities that lend themselves to a woodland setting. We will also be interested to explore the plans and potential for high quality conservation and heritage interpretation facilities here and elsewhere on the site following the closure of the National Park Gateway Centre referred to earlier.

We consider the inclusion of themed outdoor play facilities and woodland play experiences for children is an important part of this overall development as there are limited opportunities for children to enjoy imaginative and well-designed facilities of this nature in the National Park and elsewhere in Scotland. The provision of these facilities at Drumkinnon Wood would complement the existing Tree Zone facilities in the woodlands at Loch Lomond Shores and also support the Scottish Government's Health and Well-Being Strategy, along with some of the priorities of Scottish Natural Heritage which place an emphasis on engaging youngsters and getting them more active in Scotland's great outdoors.

**Zone E-Woodbank.** We welcome the inclusion of proposals for the 12 acre Woodbank House Estate in this outline application as the historic house and grounds have suffered from years of neglect. There is now a prospect of the façade of the house being restored and the outbuildings being converted sympathetically as part of the wider comprehensive plans.

The purchase of the house and grounds by the developers greatly increases the scope to open up the area to the general public and contribute to strengthening the range of tourist accommodation in the village with new glamping facilities as well as



helping with traffic management solutions. The lower part of the paddock areas could be used for car parking with a link through to the neighbouring car parks at Loch Lomond Shores and allow for access by the east-west road train proposed earlier in this submission. We would again stress the importance of investigating this further as part of any detailed planning application.

At this stage the developers are only proposing to stabilise and upgrade the façade of Woodbank House. While the proposed restoration work is welcome we would like to see greater use made of the footprint of the house with tourist letting accommodation. This has been successfully done at other semi derelict properties including the Mary Erskine Kirk in Stirling Old Town where the façade of the church was restored with a purpose built 120 bed youth hostel sympathetically added on.

**2. The proposed development will help to strengthen Balloch's appeal as a tourist destination and resort with a range of family orientated accommodation, activities and wet weather facilities which should encourage longer staying visitors with consequent economic spin off benefits for the wider community and existing businesses.**

While there has been significant investment in tourist facilities in Balloch and Loch Lomond Shores in the past 20 years, the village has failed to realise its full tourist potential and develop as a year-round tourist and leisure destination. Due to the shortage of a range of tourist accommodation the village and Loch Lomond Shores suffers from being predominantly a short stay day visitor destination as opposed to a resort destination with longer staying visitors.

This proposed development would change this and go a long way to realising the vision set out in the Clyde Valley Regional Plan in the late 1940s by Sir Patrick Abercrombie and endorsed by Councillors at that time.

Apart from the substantial number of jobs created and supported during the construction phase of the £30 million plus development, there will be an estimated permanent 80-100 full-time jobs and 180-200 part-time jobs. Many other jobs will be created and sustained locally and in the region as a direct result of the economic spin off benefits of this development.

Importantly, the developers have pledged to ensure all the posts will be in line with, or above, the recommended Scottish minimum wage rates and there will be no zero hours contracts.

It is very encouraging that the proposed development will provide in the region of 280 much needed jobs for people living in the Vale of Leven and the wider hinterland where unemployment rates are currently amongst the highest in Scotland.



The economic spin off benefits for other local tourism businesses and suppliers will be very substantial running into many millions of pounds a year. At the detailed planning application stage it would be helpful if the economic impact of the development is assessed using well tried and tested economic multiplier models.

### **3. The extensive site will be remain open for the public to enjoy for tourism and recreational purposes.**

We welcome the commitment from the developers not to gate off the site and to retain porous boundaries with a high level of public access for locals and visitors to enjoy walks, trails and the waters edges of the River Leven and the beach area at the southern end of Loch Lomond as well as the new tourist and leisure facilities planned. We also welcome the proposals to improve many of the paths and ensure they are well lit to increase public safety.

The plans for both indoor and outdoor leisure facilities, accessible to local residents, as well as visitors is welcome as all too often resort developers restrict access and with exclusive use for their own guests staying in their tourist accommodation.

In discussions with the developers they have indicated they would be willing to consider offering discounts for use of the proposed indoor water park, other paid attractions and the transport system for local residents and this should be actively encouraged as part of any future discussions and detailed planning application.

### **4. The development proposals include some positive plans to engage visitors in conservation and appreciating the special natural and cultural heritage qualities of Loch Lomond**

Given the strategic location of this site at the southern end of the loch, the developers recognise the importance of ensuring some facilities and programmes are developed and provided to meaningfully engage visitors and increase their understanding of the special natural and cultural heritage qualities of Loch Lomond. We very much welcome this commitment.

The inclusion of the woodland experience and kids zone and the visitor hub building, linked with improved paths and trails, provides an opportunity to do this and discussions with the developer suggest this is an area they would like to develop further with potential partners when they move towards working up a more detailed planning application.

As a conservation and heritage charity covering the National Park, we would be keen to have an input to the plans for conservation and heritage interpretation facilities and programmes on the site and to ensure the development makes a positive contribution to the conservation aims of the National Park.



As mentioned earlier the provision of interpretation facilities as part of the development will help fill the void left following the closure of the National Park Gateway as an educational resource and interpretation centre for Loch Lomond and the wider National Park area.

The developers have a well-established track record in developing and funding conservation programmes elsewhere and we are pleased they are willing to invest heavily in conservation facilities and programmes as part of this proposed development.

- 5. There is an opportunity as part of this development to improve transport connections between different parts of the village and to improve parking and traffic management arrangements for the benefit of local residents and visitors as part of making Balloch a more pleasant place to live, work and visit.**

The inclusion of a transport link by monorail from the new Station Square opposite the railway station to a point near Balloch Pier and Loch Lomond Shores is welcome and addresses one of the priorities identified in the recent Balloch Charrette

However, as outlined earlier there is potential to deliver a more ambitious and much needed east-west transport link connecting key nodal points with the use of a land train. This could run frequently from the bus terminal and opposite the entrance to Balloch Castle Country Park, via Moss of Balloch car parks, over the bridge to Station Square, then along Pier Road to the new indoor water park and visitor hub/Balloch Pier area, before linking with Loch Lomond Shores and the large car parks there and then onto potential new overflow car parking in the grounds of Woodbank House.

This would also provide the opportunity to reduce the scale of car parking provision proposed along the Pier Road axis. Identifying where the best locations are to develop new and improved car parking facilities, linked to a flexible transport system, could help make the spine of West Riverside, Station Square and part of Balloch Road east of the River Leven more pedestrian and cycle friendly while complementing the townscape plans being progressed by West Dunbartonshire in partnership with Sustrans, the National Park Authority and the local community. There would be more spin off benefits for existing attractions and businesses with a more integrated transport link and well thought through traffic management scheme.

There is a 'big prize' to be won by taking a more strategic approach to traffic management, car parking and transport links and services over a wider area than the proposed development site and the developers have expressed a strong willingness



to be involved in a wider scheme as they refine their proposals at detailed planning application stage and we welcome this.

The developers have also expressed a strong desire to work closely with rail operators to encourage visitors to come to Balloch by train. There are clearly opportunities to develop attractively priced joint ticketing and to participate in the rail operator family days out and breaks promotions which have proved so successful in other parts of the UK. We are very supportive of any move to have integrated ticketing for transport (land and water based) and attractions as part of promoting travel to what would be a much more appealing tourist destination.

### **Concluding Remarks**

We are aware there are a substantial number of objections to this particular application but consider many of them are not based on valid planning grounds such as ownership of the site or simply the name of the developers which led to many individuals jumping to the wrong conclusion that this was a major theme park related development, as opposed to a destination resort development with tourist accommodation and related leisure facilities, with much of the land being retained as green open space freely open to the general public. Many are also not aware of the industrial past of most of the site and the planning policy context which for almost 70 years has identified the area for the development of major tourist and recreational facilities.

As outlined earlier we consider the proposals before the National Park Authority at this outline planning application stage have much to commend them with far reaching economic, social and conservation benefits for Loch Lomond, the Vale of Leven and the wider area. There is scope to refine and improve the proposals further as they move from outline planning to detailed planning stage and, as highlighted, there is a major opportunity to tackle Balloch-wide traffic management, car park and public transport connectivity issues to make the village a more pleasant and vibrant place for local residents and visitors.

We therefore strongly support this comprehensive package of tourism and leisure led development and commend them to the National Park Authority with the various qualifications and suggestions outlined in this submission. We trust Board members will approve the application so that the full potential of Balloch as a visitor destination and a pleasant place to live and work can be realised.

Yours sincerely,

*James Fraser*

James Fraser

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