

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

23rd September 2022

Dear Caroline Strugnell,

2022/0157/PPP - Land At Pier Road, Ben Lomond Way And Old Luss Road, Known As West Riverside And Woodbank House (Lomond Banks) Balloch

The National Trust for Scotland wishes to **object** to this application, as it currently stands.

The Trust recognises that the applicant has taken into account comments on their previous proposals, and has made a number of improvements. We believe more can still be done, particularly in safeguarding the areas of Ancient Woodland, and in ensuring the development connects to the wider community and the local economy.

A vision for Balloch

We would strongly recommend that the proposed development incorporate the aspirations of the local community, especially the relevant elements identified in the 2016 charette for Balloch (*Balloch Charette Report Final Issue 16th May 2016*). In the case of West Riverside, we believe the new development needs to work with existing social and economic assets and ensure that Balloch overall benefits from the development.

From the recent charette, particular desired developments we would highlight:

- "Riverside walkway linking Loch Lomond Shores and the village should be green in character but have day and evening activity along it"
- "The opportunity is that a generous, active and well used walkway along the river can become synonymous with Balloch and an attraction in itself"
- "The Riverside should feel safe and enjoyable in the evening as well as during the day"
- "There needs to be better connections between the village, Loch Lomond Shores and Balloch Country Park"

- “Integration of existing routes: River Leven towpath, John Muir Way, Three Lochs Way and via Loch Lomond Shores to Cameron House”
- “Define guidelines for development to rear of riverside walkway: create opportunities for eating, drinking and outdoor activity to improve Balloch’s offer and choice, connect rather than divide village centre and Loch Lomond Shores, maximise access for visitors and residents”
- “Put in place measures to reduce erosion of river banks”

We would ask that the West Riverside proposals incorporate these aspirations.

Protecting designated Ancient Woodland

We appreciate that the application has made a commitment to maintain tree cover where possible, and to remove invasive species. However, due to the scale of the development we are concerned that there will be direct loss and potential damage to a significant area of ancient woodland across the site which we do not support.

The *Loch Lomond & Trossachs National Park Local Development Plan* sets out a number of policies relevant to this application. We would particularly note the commitment in the Park’s policies to the protection of Ancient Woodlands, as should be the case throughout Scotland, but most particularly in a National Park, specifically:

“Development Impacts on Trees and Woodlands - 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.”

The national *Scottish Planning Policy* reinforces this, stating:

“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 Orders⁹¹ can be used to protect individual trees and groups of trees considered important for amenity or their cultural or historic interest.”

Given the nature emergency, and the need to improve connectivity between areas to safeguard biodiversity, every effort should be made to retain these important areas of

woodland. We would like to see the proposals amended to fully protect the designated woodlands and avoid any loss of this vital natural heritage resource.

Scale of the Development

The attraction of the extra jobs and enhanced tourism offering this would bring to the Balloch area is understandable, however it seems at such a scale it would draw business away from the existing tourism businesses and compete with them for a limited supporting labour market. Along with other businesses and organisations in the area we have been aware of existing recruitment difficulties this year in finding staff for cleaning and catering; more demand would stretch this finite resource even further.

In addition, we are concerned that the scale of the development will result in a significant increase in traffic, putting greater pressure on the roads network in the Balloch area which is already strained.

The EIA report -Vol 2 – Appendix 14.2 indicates high levels of visitor satisfaction with the tourism offering and experience which is already available, including in the Balloch area. Care needs to be taken that new developments are not to the detriment of what already exists, particularly if there is already high visitor satisfaction; the scale of this proposed new development is we feel such that it could pose a risk to the ongoing viability of other existing tourism businesses in the Balloch area.

We also note that scenery and landscape, as well as the opportunity to “get away from it all” are listed as prime motivators for visitors to the area. We fully understand the economic benefits of bringing more opportunity for visitors to arrive in and appreciate the Loch Lomond area, but are mindful that the scale of this development may disturb the very values visitors are looking for when they come to the area.

Conclusion

One positive feature of the application is a proposal for the reuse of Woodbank House, a Grade A listed building. We would support plans for reuse that retain as much of the historic fabric as possible, and which respect the local setting of this asset.

The National Trust for Scotland has advocated for a greater role for communities in shaping their environments. There appears to be some local voices of support for the proposed development, but many also expressing disquiet and outright objection about the scale and potential impacts of it. We hope the local community most directly affected by the proposal

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are fully paid heed to and their concerns recognised and addressed when considering this development.

Yours sincerely

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The National Trust for Scotland