

Appendix 2 : West Dunbartonshire Council Response to Loch Lomond and Trossachs National Park Authority

Planning application: Erection and operation of a mixed-use tourism and leisure development Land at Pier Road, Ben Lomond Way and Old Luss Road Known as West Riverside and Woodbank House (Lomond Banks) Balloch

West Dunbartonshire Council has no objections to the above planning application as a neighbouring Planning Authority subject to the recommended works to the Ballochloan Roundabout being conditioned and undertaken. If these works are not conditioned the Council would object to the development. Further, West Dunbartonshire Council offers the comments in the following paragraphs. The Council reserve the right to add to this response due to new and additional information as a result of further notification.

Context

West Dunbartonshire Council is not the planning authority for the National Park area and therefore not the planning authority for the Lomond Banks development. However, the proposed development is within the West Dunbartonshire Council area and will impact on many matters that the Council does have a responsibility for as well as being of significant interest to communities, businesses, and organisations within the West Dunbartonshire Council area.

The adopted Loch Lomond & the Trossachs National Park Local Development Plan (LLTNP)2017- 2021, and National Planning Framework (NPF) 4 forms the statutory development plan.

The LLTNP sets out a vision and spatial strategy for the National Park area focused a place to Live, Invest, Visit and Experience. The Local Development Plan's Strategy which identifies Balloch as a Strategic Tourism Opportunity, recognising its potential for enhancing its role as a premium visitor destination and gateway to the National Park. West Riverside and Woodbank House are allocated for visitor experience uses and the Old Station is allocated for mixed use of visitor experience and transport. West Riverside, Woodbank and Station Square make up the proposed Lomond Banks development area. The Local Development Plan promotes specific sites where tourism development can be accommodated to meet tourism market demands while conserving and enhancing the natural environment.

LIVE in Balloch outlines a strategy for future development based upon the 2016 Balloch Charrette which focused on initiatives located with the proposed site.

The assessment of the proposals including cross-boundary issues within West Dunbartonshire Council Planning Authority Area, should be assessed against the policies within the Loch Lomond & the Trossachs National Park Local Development Plan 2017-2021.

The Council has identified the following matters of relevance and make reference to these with regard to the policies set out in NPF4:

Climate mitigation and adaption

In line with Policy 2 of NPF4 the proposed development should be sited and designed to minimise lifecycle greenhouse gas emissions and to adapt to current and future risks from climate change. This would help West Dunbartonshire meet its ambitions for reaching Net Zero set out in its Climate Change Strategy and associated Action Plan. There are good opportunities for innovative projects on the site in relation to Net Zero in conjunction with the National Park Authority.

Biodiversity and natural places

Policy 3(a) of NPF4 requires development proposals to contribute to the enhancement of biodiversity and integrate nature-based solutions, where possible. Policy 3(b) requires major development to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. Policy 4 protects sites designated for nature conservation and protected species and Policy 6 Forestry, woodland and trees aims to protect and expand forests, woodland and trees.

The Council's Biodiversity Officer offers the following comments which should be taken into account when assessing the proposals against these policies:

The woodland loss of both ancient woodland and native/nearly native woodland remains at a high level. There is no evidence of compensatory planting plan proposal but this would be required. The retention of the Long Established Plantation Origin (LEPO) woodland would provide a much more mature and biodiverse habitat than the new planting proposal to the north of the existing plantation. Whilst in time, new native woodland would provide a biodiversity benefit; this will take many decades or longer to provide the same quality of habitat that is being proposed for removal to accommodate the dwellings in the Woodbank house field. If the number of dwellings in this location were reduced or reconfigured then potentially more of the LEPO woodland could be saved. There is also the additional factor of the impact of wildlife on all of the woodland plots as they become more populated with people that the additional disturbance and noise could reduce the biodiversity of these areas regardless.

The loss of the succession woodland at the pier head to accommodate the building is extensive. This is also a very well used visitor area as are both the beaches in front of the proposed hotel area.

In the EIAR v3 Non technical summary there is clarification of no further works in Drumkinnon woods which is welcomed.

In the EIAR v3 Non technical summary 5.2.7 – proposes a Landscape and biodiversity management plan for the ancient woodland area. It is requested a visualisation of this area in terms of tree loss and retention.

In the EIAR v3 Non technical summary, there is a proposal for the management of INNS which is welcomed as well as the removal of other non native species such as Harebell.

In the EIAR v3 Non technical summary, 5.2.13 provides impacts on red squirrel and as indicated previously there should be engagement around a grey squirrel management strategy prior to any construction phase should this development proceed.

In the EIAR v3 Non technical summary, 5.2.16 refers to bird box installation. These will need to be maintained and a record of the responsible person for this should be mentioned.

It is welcomed that the development no longer impacts on Drumkinnon Wood.

Zero waste

West Dunbartonshire Council may have responsibility for collecting waste from the proposed development. The Council therefore requests that the proposal is assessed against Policy 12 of NPF4 with regard to:

- the reduction, reuse and recycling of materials (criteria a)
- the provision of information relating to how much waste the proposals is expected to generate and how it will be managed (criteria c)

If approved, the Council would request that a condition(s) should be applied requiring the above information to be submitted, and that this information is shared with the Council for comment.

Sustainable transport

The Council notes that the site is potentially accessible via a range of transport, including walking, wheeling and public transport. In line with Policy 13, the Council expects the development to be designed and to include infrastructure and facilities, to encourage the use of sustainable transport to reach the site. An important connection is the proposed route through the site connecting Balloch as a whole with the development at Lomond Shores to encourage public access and reduce the use of the car, bringing more opportunities for the residents of Balloch and the surrounding area. The proposed monorail between Station Square and Pierhead enhances the connectivity between Balloch and Lomond Shores. This will assist in supporting an evening/winter economy together with the proposed tourism and commercial developments in the area. We are pleased that there are improvements proposed to the riverside walkway and its accessibility. We understand that discussions are underway with Scotrail to improve the rail service at Balloch to encourage users of the facilities to use more sustainable transport modes. Bike hire, available at Station Square will encourage more movements by bike and will be a welcome addition to the facilities proposed at this location.

Key walking and cycling routes such as NCN Route 7, the John Muir Way and West Loch Lomond Cycle Way will be enhanced and widened to Sustrans standards. The enhancements to these shared walking and cycle routes will also bring benefits to the wider community and this is a welcome addition.

The “Lomond Promise” was submitted to LLTNPA and it binds the applicant to vows made to the community at pre-application stage, and included providing sustainable transport measures such as:

- Green Travel Plan.
- Summer Traffic Survey to be carried out once operational.
- Provision of an electric hopper bus to serve the development.
- Investigate integrated bus/rail tickets options.
- Cyclescheme initiative for employees.
- Provision of electric buggies for customers within the site.
- Provision of signage and facilities for walkers and cyclists.

It is understood that this came in response to issues raised by the community throughout the planning application process and it is aimed to reassure the local community that the applicant is committed to having a positive long-term impact on the area by being an active and responsible participant of the Balloch community. This commitment to the community and the measures to support sustainable modes of transport is welcomed by West Dunbartonshire Council.

Other measures being proposed such as the Travel Noticeboards could provide links to existing information on pedestrian facilities in the wider Balloch area including the Core Paths as well as distances and associated walking journey times. Provision of adequate warning signs throughout the development site alerting drivers to the main pedestrian routes through the site and discounted or free travel for employees on the proposed monorail, would assist with completing the last leg by foot.

Bus services currently operate on Ben Lomond Way within the main Loch Lomond Shores site as well as a more frequent level of service on Balloch and Drymen Road.

The proposed monorail is a particular attraction of the development and it will enhance connectivity from Balloch village main to the heart of the development (adjacent to Loch Lomond Shores retail crescent and Pierhead). Discounted or free travel for employees on the proposed monorail, would assist with encouraging access to the wider public transport services and would be of benefit to employees who are residents of West Dunbartonshire area.

To maximise uptake of public transport by employees, residents and visitors the site the development will be supported by the introduction of the provision of Travel Noticeboards within staff areas/ facilities showing the locations of local bus stops (& stance) and rail/ monorail station locations, including indicative walking and cycling journey times together with bus and rail and monorail timetable information and Local public transport operator contact details.

All these proposals are welcomed to reduce the impact on the development on the local community and the area whilst providing greater access to existing and new facilities.

Liveable places

Consideration should be given to the impact of the proposed development on the amenity of the surrounding area in line with Policy 14, having particular regard to the amenity of existing residential areas in proximity to the proposed development site in terms of noise, dust, smell, traffic, parking and other general amenity issues.

Local living

The Council notes the significant amount of holiday accommodation being proposed within the development, as well as staff and day visitors, and notes the mutual benefits that would be achieved for users and employees of the development, and existing facilities and businesses by the provision of good connections between the development site and Balloch and the wider area West Dunbartonshire area. The enhancement and promotion of the use of sustainable transport modes will help to reduce impact on the local area but also facilitate greater access for the wider community.

Infrastructure first

In line with Policy 18, the impacts of the development on infrastructure should be mitigated:

Traffic impact

Whilst the applicant is promoting and enhancing more sustainable transport modes of transport, it is acknowledged the development is a significant travel generating use, and a transport assessment and travel plan accompanies the proposals. This is acceptable to the Council's Roads and Transportation Service subject to certain conditions.

The proposal has the potential for traffic impacts on the adjacent roads - A82, A811, Balloch Road, Old Luss Road, Pier Road and Ben Lomond Way. The potential effects on these road networks and any impact on the wider area in terms of capacity, congestion and delay are considered in the submitted Transport Assessment. The Transport Assessment has been independently assessed by consultants for the Council's Roads Service and is based on 2017 Traffic Survey information together with the traffic movement at peak times and the network capacity with the additional trips from the development.

It is widely known that the summer season, good weather weekends and local events can increase traffic significantly on the A82, A811 and the local roads, all to the detriment of the local area. Survey data was gathered in August 2017 (W/C Thursday 10th August 2017 to Wednesday 16th August 2017 inclusive) during the summer holiday period. This was to provide traffic data for a sensitivity assessment,

should it be required at key pinch points on the network subject to a neutral month assessment. Normally mitigation would not be provided for a summer season assessment given the industry standard premise that is generally not appropriate to design and build for a non-neutral assessment scenario. However following discussion with the Council's Roads Service additional surveys were undertaken by the applicant's agent on two junctions in November 2021 to check the validity of the extensive 2017 surveys. The assessment of the two surveys found that the 2017 survey flows were higher than the 2021 flows in both the morning and evening peak period. The report at that time showed both junctions worked with adequate reserve capacity with no material traffic impact from the proposed development on the operation of the existing Stoneymollan Roundabout Junction and Ballochloan Roundabout. There were some occasional spikes mainly due to queuing from the adjacent MacDonalds food outlet and seasonal traffic. The report indicates that this issue will not be exacerbated by the proposed development at Lomond Banks.

It is understood that the applicants have agreed to make a financial contribution to Transport Scotland through Section 48 Agreement of the Road Act towards Transport Scotland's plans to improve the Stoneymollan Roundabout. The improvement and finance agreed will cover new signalisation at the Stoneymollan roundabout and realignment of the Roundabout. This together with other planned alterations work undertaken by Transport Scotland on Stoneymollan Roundabout will help manage the flow of traffic more efficiently in the area.

This agreement between the applicant and Transport Scotland is separate from the Planning Process however West Dunbartonshire Council support the mitigation measures to be undertaken to the Stoneymollan Roundabout.

Following extensive discussions between the applicant's agent and the Council's Roads Service, our Road service requested a further summer traffic assessment to provide confirmation of the previous conclusions from the Summer Assessment of 2017. Additional traffic surveys were carried out in August 2023. The Council's Road Service then carried out a further review of the traffic data which shows that the 2023 data is higher in the PM peak, but lower in the AM and Saturday compared to the 2017 traffic flows. The model has been calibrated correctly in relation to geometries and input traffic flow scenarios. A review of the traffic flows showed that on a number of approaches unequal lane usage was present. This would result in an over estimation of capacity.

As a result, the Council's Roads Service commissioned consultants to model the Ballochloan Roundabout applying survey data captured to better understand the operational performance of the junction with the inclusion of the additional development. High level consideration of the Lomond Shores model noted that there was unequal lane usage and a number of traffic flows showed that on a number of approaches unequal lane usage present. This would result in an overestimation of capacity. A review of geometry of the approaches noted some minor changes to the geometry inputs from the model submitted as part of the Transport Assessment. Therefore, the model shows capacity issues on A811 W approach in the PM peak in 2023 Base Scenario. A review of the roundabout suggests a widening of A811 W approach to allow a left slip lane will mitigate against the issue and add further capacity in times of high usage.

Therefore, the Council recommends that the above works to Ballochloan Roundabout is undertaken and is conditioned to any grant of planning permission.

Parking provision

The parking provision should provide additional parking for the development and will supplement existing parking already provided in the local area and help to avoid on street parking. There is a recognition that while parking demand must be catered for, overprovision is equally unacceptable in the overarching effort to encourage uptake of sustainable travel modes over private car. Parking provision has been calculated on individual uses proposed. Exact parking quantum will be appropriately considered in line with West Dunbartonshire Council's parking standards for the hotel, water leisure and lodges at the detailed application stage. A Parking and Signage Strategy sets out how parking across the site will be managed to ensure guests of Lomond Banks will park appropriately and not have a detrimental impact on adjacent streets and residential areas.

Heat and cooling

The Council has recently approved a draft Local Heat and Energy Efficiency Strategy which identifies a Heat Network Strategic Zone in Alexandria. In line with Policy 19, consideration should be given to the opportunity of the proposed development site benefitting from or contributing to a sustainable heat network. There would be good opportunities to take forward innovative projects in terms of heat and energy.

Blue and green infrastructure

In line with Policy 20, the Council expects the development to avoid fragmentation and net loss of existing blue and green infrastructure across the site. In particular, the development should seek to enhance and not lead to a reduction in the provision of public access to and across the site, and to the river where appropriate. Existing public access routes and connections should be retained and enhanced where possible.

Play, recreation and sport

The Council notes the inclusion of play and sport facilities in the proposal and the potential support offered for this through Policy 21. The proposed development should ensure there is no net loss of publicly accessible formal and informal play opportunities and the new facilities are available to the wider Balloch and Vale of Leven area.

Flood risk and water management

When assessing the proposals against Policy 22, the Council requires that any assessment of flood risk and proposals for managing flood risk and water management have regard to possible impact on locations outwith the development site. Policy 22 promotes a precautionary approach to flooding by avoiding

development in flood risk areas. The Majority of Zone B –Riverside and part of Zone A –Station Square is in the flood risk area and SEPA have ask these are modified to remove development from the flood risk area.

SEPA are presently objecting to the development under policy 22 of NPF4 and it will be for the National Park Planning Authority to resolve this objection and to ensure that the proposal can meet the criteria in terms of Policy 22 of NPF4 and that any agreed measures do not have an adverse impact on the adjacent area.

Health and safety

In line with Policy 23, the Council notes that the proposed development includes facilities that will offer the opportunity for health improvement e.g. health facilities, paths etc.

The impact of construction and operational noise on local residential areas should be assessed and mitigated.

Community wealth building

In line with Policy 25, the Council expects the development to contribute to community wealth building through the provision of community and economic benefits. These may include, but not be limited to, the creation of jobs for local people, the use of local supply chains, and the provision of access and facilities on the site that will benefit the health and wellbeing of local people. The “Lomond Promise” involves the applicant committing to work in partnership with local businesses and the Community Councils and support collaborative marketing campaigns to promote Local Communities and their business. There is significant potential for the development to benefit the local economy.

City, town, local and commercial centres

The Council notes that some of the uses proposed are referenced in Policy 27 as uses that would generate significant footfall and could be located within town, local or commercial centres. The Council requests that the impact of these uses on existing centres such as Balloch, Alexandria and Dumbarton be assessed as part of the development and any adverse impacts mitigated.

Retail

The Council notes that the proposed development includes retail facilities with limited information available on the scale and nature of these. Assessment against Policy 28 of NPF4 will therefore be required, and the Council requests that this assessment has regard to impact on existing retail businesses and premises in Balloch centre and Alexandria town centre, with conditions applied restricting the scale and nature of retail operations to ensure no significant adverse impact on these centres.

Tourism

The Council notes that the proposed development site is zoned for tourism uses in the relevant local plan, and that there is therefore support in principle for tourism development on the site offered by Policy 30.

The economic benefits of the proposal with regard to new jobs created within the development, and increased local expenditure from visitors to the site are recognised which would benefit local businesses and traders and specifically would assist the ongoing viability of Lomond Shores. The proposal would help to establish Balloch as a gateway to Loch Lomond and increase its attractiveness as a tourist destination. The new development is likely to stimulate further improvements in Balloch e.g. Station Square, Duncan Mill Slipway improvements or active travel links linking to the National Cycle Network. Increased number of visitors staying in the area could help unlock redevelopment potential of Balloch Castle and help other local attractions e.g. Maid of the Loch.

The development proposals would be positive in terms of increase in local employment opportunities and increase in tourism numbers to the local area which could also benefit local businesses and traders, and specifically would assist the ongoing viability of Lomond Shores through the “Lomond Promise” which is detailed above.

The Council considers the key consideration of the assessment of this proposal is set out in criteria b) ii. of Policy 30, which is ensuring that the proposed development is compatible with the surrounding area in terms of the nature and scale of the development and the impacts of increased visitors.

Culture and creativity

In line with Policy 31, opportunities for public art should be explored as part of the assessment of the application which will benefit the development proposal but the wider area.

