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Dear Ms Emery

Application 2018/0133/PPP The erection and operation of a tourism and leisure led mixed use development at Balloch

Ramblers Scotland is writing to **object** to this application for planning permission in principle on the grounds that it is a departure from the Local Development Plan (LDP).

We acknowledge the long history of the efforts to develop this site and we also recognise that the need for investment in recreation and visitor accommodation provision has been identified in this area. There are aspects of the proposal that we support in principle. However, the LDP was published in 2017 when many discussions between the planners within the national park authority and the developers would already have taken place. It is therefore disappointing that time is spent consulting local communities and others on LDPs which are signed off and published, only to see a developer putting in a proposal which departs from that plan.

In particular, we note that while the West Riverside area is zoned for Visitor Experience in the LDP, the area of the site within this application, shown as zone D, Drumkinnon Wood and the Bay, is not included for development within the LDP. Yet the application shows this area is to be developed with up to 32 lodges planned. In addition, Woodbank House is zoned in the LDP for Visitor Experience, and yet the proposals for Zone E include up to 20 residential dwellings. We have long called for a right of appeal for communities who are faced with such departures from development plans despite engaging at length earlier in the planning process, so it is particularly disappointing to see this happening within our national park and when a government agency is one of the developers.

The result of this extra development within these two areas outwith the LDP leads to the perception of a project which contains too many elements, is too large in scale and which fails to reflect the aims of the national park within which it is located. It suggests that this development could be sited as a visitor attraction anywhere in Scotland, and that it is not appropriate as a gateway to one of our two national parks. Rather than attracting people who will then be encouraged and enabled to learn more about the national park, to visit Balloch and its country park and to take part in the many free opportunities for outdoor recreation nearby, we have concerns that this large visitor attraction will create many more journeys by private vehicle to what is already a congested area and then keep them within its boundaries.

Since this is an application for planning permission in principle we will not make further detailed comments but would like to raise the following points:

Permeability of the site: We are pleased to see that the plan recognises and protects the route of the John Muir Way/Three Lochs Way which runs through the site and that new path networks (we assume these will be multi-use paths, not just for walkers as stated in the plan) will be

created in Area 4b as well as Areas 3a and 3d. However, it is very important that the boundary of the site remains permeable for members of the public as well as guests staying in the resort, and that informal public access to the woodland and lochshore/riverside areas is retained. We recommend that if the application is approved, there should be a planning condition which stipulates that the boundary of the development remains porous so that members of the public are able to access it at multiple points, rather than being funneled to the main vehicle entrances and the John Muir Way entry/exit points. This will ensure that existing opportunities for informal public access in the area under consideration are maintained.

Woodland development: While we have concerns over the lodge development within Drumkinnon Wood, Area 3b, and the housing in area 4b, we believe that enhancement of these woodlands to provide further opportunities for informal, family-friendly outdoor recreation in a green setting would be appropriate. Large parts of these woodlands are listed in the inventory of ancient woodlands and are a national asset to be enjoyed by all. Related to this issue of maintaining informal public access in the woodlands, we are concerned that if Area 3b is filled with lodges, as set out in the proposal, this will have the result of discouraging the local residents of Balloch or visitors to the area from enjoying a large area of woodland as is currently the case. The presence of the lodges and their inhabitants in the woodland will create the impression that this is a private zone. Likewise, we object to the housing and lodges proposed in the Woodbank zone which will also risk turning this woodland area into a semi-private zone, and is not in accordance with the Local Development Plan.

Line of the Riverfront path: We question whether the line of the main path running through Area 3a as shown on the outline plan is the best route for the John Muir Way, given that there will also be up to 43 lodges within that woodland, potentially leading to a perception that the woodland is a private area. We would suggest that as well as developing this central route, a line is also created which is closer to the river, along with links between the two routes as already shown in the plan by dotted lines. We believe this would give a better experience for people using the path network through the woodland and make it easier to do circular walks.

Monorail alternatives: Finally, we recognise in this application a response to the need for low cost accommodation within the park, and also the need to provide indoor attractions for wet weather activities, in the form of the water park, visitor hub, etc. We do, however, question whether the construction of a monorail can be justified in terms of the impact it will have on the woodland area it passes through. Instead we would suggest developing the whole site to be car-free with a regular shuttle bus service along the road running between Balloch and the Pier, together with a wide offroad route through the woods, perhaps adjacent to the line of the John Muir Way as suggested above, to be used primarily as cycle route. The resort should then offer bikes/e-bikes for hire, free bikes with every accommodation booking, free disabled vehicles for hire, and bicycle taxi services to enable people of all abilities to travel actively from Balloch to the pier. This offroad route could then be extended through Balloch into the country park, as well as linking up with the National Cycle Network along the western side of Loch Lomond offering opportunities to explore the wider area without a car for both visitors and residents of Balloch.

We would be happy to meet the local authority or the developer to discuss these issues further.

Yours sincerely

Helen Todd
Campaigns & policy manager

Convener: Alison Mitchell
President: Ben Dolphin
Director: Jess Dolan

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