

Appendix 3 – EIA Scoping

3.1 EIA Scoping Opinion

Flamingo Land Limited
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 Glasgow
 G2 1DY

LOCH LOMOND & THE TROSSACHS NATIONAL PARK



27 July 2021

Dear Mark

ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 SCOPING OPINION

Reference Number: PSC/2021/0005

Proposal: Erection and operation of a tourism and leisure-led mixed-use development including: hotel and holiday lodge accommodation; controlled camping areas; leisure and recreational facilities; education and visitor interpretation facilities; refurbishment and renovation of Woodbank House and attendant structures (including new visitor and residential accommodation in the grounds); woodland play / adventure areas; hot food café / restaurant uses; transport infrastructure; public realm enhancements including footpaths, event spaces and cycleways; ancillary uses; landscaping; and supporting services/infrastructure (including drainage, potential flood mitigation measures, water supply and utilities)

Location: Land At Pier Road, Ben Lomond Way And Old Luss Road, Known As West Riverside And Woodbank House (Lomond Banks) Balloch

The purpose of this Scoping Opinion is to outline the key issues that are considered relevant to the proposal and to advise on the matters to be covered in the EIA Report to accompany any future planning application for the project as described.

It is not intended to be comprehensive, as the EIA process may well uncover as yet unidentified significant environmental issues and potential impacts.

For your information consultations in relation to the Scoping request have been received from the following external consultees at the time of writing:

- Scottish Environmental Protection Agency (SEPA)
- Historic Environment Scotland (HES)
- NatureScot (NS)
- Transport Scotland
- West of Scotland Archaeology Service (WOSAS)
- Scottish Water
- Health and Safety Executive
- Petroineos
- West Dunbartonshire Council (WDC) Roads Services
- West Dunbartonshire Council (WDC) Environmental Health

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The Health and Safety Executive and Transport Scotland responded to advise that they do not routinely respond to EIA Scoping consultations. Transport Scotland will be consulted on the future application.

The response from Petroineos makes no comment on the scope of the EIA but requests that the applicant contacts them for advice regarding any works in the vicinity of the pipeline at the construction stage. The response from Scottish Water highlights assets in the vicinity and requests that enquiries are made direct regarding any necessary diversions. They also highlight the existence of a drinking water protection area – please refer to the further advice below. Both responses are attached.

For completeness I have attached copies of the responses received from all consultees at Appendix 2. In particular, the advice from NS, HES, WOSAS and SEPA should be read in conjunction with this letter as the detailed advice is not repeated here.

No response was received from West Dunbartonshire Council (WDC) Flood Prevention, West Dunbartonshire Council (WDC) Forward Planning or the Civil Aviation Authority at the time of writing. If any further responses are received these will be forwarded separately.

Schedule 4 from the EIA regulations sets out what information is to be included in an EIA Report. I have included details of this within Appendix 1 for completeness.

1. DESCRIPTION OF THE DEVELOPMENT

- 1.1. We understand that the proposal is for a mixed use tourism and leisure-led development, the components of which would include:
- hotel and holiday lodge accommodation;
 - controlled camping areas;
 - leisure and recreational facilities;
 - education and visitor interpretation facilities;
 - refurbishment and renovation of the listed Woodbank House and attendant structures (including new visitor and residential accommodation in the grounds);
 - woodland play / adventure areas;
 - hot food café / restaurant uses;
 - transport infrastructure;
 - public realm enhancements including footpaths, event spaces and cycleways;
 - ancillary uses;
 - landscaping; and supporting services/infrastructure (including drainage, potential flood mitigation measures, water supply and utilities)

2. POLICY BACKGROUND AND GUIDANCE

- 2.1. Section 2.3 of the submitted EIA Screening and Scoping Report sets out the relevant policy and guidance. We note NPF3 and SPP are included however these were developed some time ago so appropriate consideration ought also to be given to The Scottish Government position statement for NPF4 and its priorities.
- 2.2. The LDP's Housing Supplementary Guidance is also a material planning consideration which should be considered where residential accommodation (if for sale or let as principle/main

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residence) is proposed. The document can be accessed here: <http://www.lochlomond-trossachs.org/wp-content/uploads/2016/07/SG-Housing-2017-adopted-1.pdf>

- 2.3. The National Park Partnership Plan (2018-2023) is a relevant material consideration and should be acknowledged in this section along with explicit reference to the four National Park Aims set out in The National Parks (Scotland) Act 2000. <https://www.lochlomond-trossachs.org/park-authority/what-we-do/national-park-partnership-plan-2018-2023/>
- 2.4. The National Park Authority has also prepared an indicative regional spatial strategy which may be given some material weight. The document can be accessed here: <https://www.lochlomond-trossachs.org/park-authority/publications/indicative-regional-spatial-strategy-september-2020/>
- 2.5. Finally, we would highlight since the adoption of the National Park LDP there is now a greater focus on a low carbon economy, greener tourism and ensuring a strong focus on delivering outcomes for climate change biodiversity and place. The EIA ought therefore to reference the Scottish Government Climate Change Plan <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/>

3. EIA REPORT

- 3.1. The EIA Report must contain at least the information specified in Regulation 5 and any additional information specified in Schedule 4 of the 2017 Regulations (reproduced in Appendix 1 to this letter) which is relevant to the specific characteristics of the development and to the environmental features likely to be affected.
- 3.2. Section 3 of the EIA Screening and Scoping Report sets out the topics the EIA will cover – namely, ecology; trees and woodland; noise and vibration; air quality; ground conditions and geology; water quality and flood risk; landscape and visual impacts; traffic and transport; archaeology and heritage; socio-economics, tourism and recreation; and ‘other topics’. We provide comment on the scope of the EIA as set out under those chapters below.

4. ENVIRONMENTAL TOPIC AREAS

Ecology

- 4.1. Nature Scot (NS) agree that based on the distance between the proposed development and designated sites identified in the scoping report, it is unlikely that there will be any direct impacts on their protected features. However, as the exact composition and extent of the development is not yet finalised, they recommend that the designated sites are considered with regard to potential indirect impacts, for example resulting from increase in visitor numbers to the area.
- 4.2. The proposed development is approximately 10km from the Endrick Water SAC, which is classified for its population of Atlantic salmon and River and Brook lamprey. Atlantic salmon will use the River Leven to migrate to and from the sea, therefore there is a functional connection between the site and the SAC. NS recommend that potential impacts (which may include vibration from piling during construction) are evaluated as part of the assessment of the impacts from the proposal.

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- 4.3. NS supports the re-surveying of key species and the establishment of a baseline for breeding birds. The ecological and arboricultural attributes of the site will require evaluation as part of the design process.
- 4.4. The National Park's Landscape Advisor makes the following comments. The EIA should include the surveys below which take cognisance of relevant wildlife legislation and good practice guidance available from Nature Scot (NS). These documents can be accessed here:- <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice>

Habitat

- 4.5. The European Nature Information System (EUNIS) has been adopted by NS to replace JNCC Phase 1 habitat surveys. For the avoidance of doubt, target notes should include ancient woodland indicators such as bluebells and dog's mercury and these should be mapped on an aerial photograph of the separate developments site areas to clearly show distribution of these species (polygons showing these areas with ancient woodland indicators will allow clarity on location). DAFOR (Dominant, Abundant, Frequent, Occasional, Rare) should also be used for species.
- 4.6. All non-native species should be target noted and mapped for each proposed development area.
- 4.7. All proposed development footprint should be overlain on a National Vegetation Classification (NVC) map and an aerial map for each development area with pull out photographs.
- 4.8. As at 4.2 above Nature Scot has provided advice regarding the importance of assessment of potential development impacts on the Endrick SAC and this information will inform the Habitat Regulation Assessment and resultant Appropriate Assessment that will be required under European legislation.

Protected Species

- 4.9. The surveys for protected species carried out previously for the development proposals should be updated and adhere to the guidance on survey methodology provided by Nature Scot. It will be necessary to ensure that potential Bat Roost Surveys are supported by emergent surveys to accurately advise on licensing and mitigation. It will also be necessary to ensure that bat surveys are carried out before mid - July to provide accurate information on bat roosts as bats often leave their main roost at this time for other locations.

Trees and Woodland

- 4.10. The National Park's Tree and Woodland Advisor makes the following comments. It is unclear from the Scoping Report what development is proposed and in what parts of the woodland would be affected. Nevertheless, the following advice is offered.

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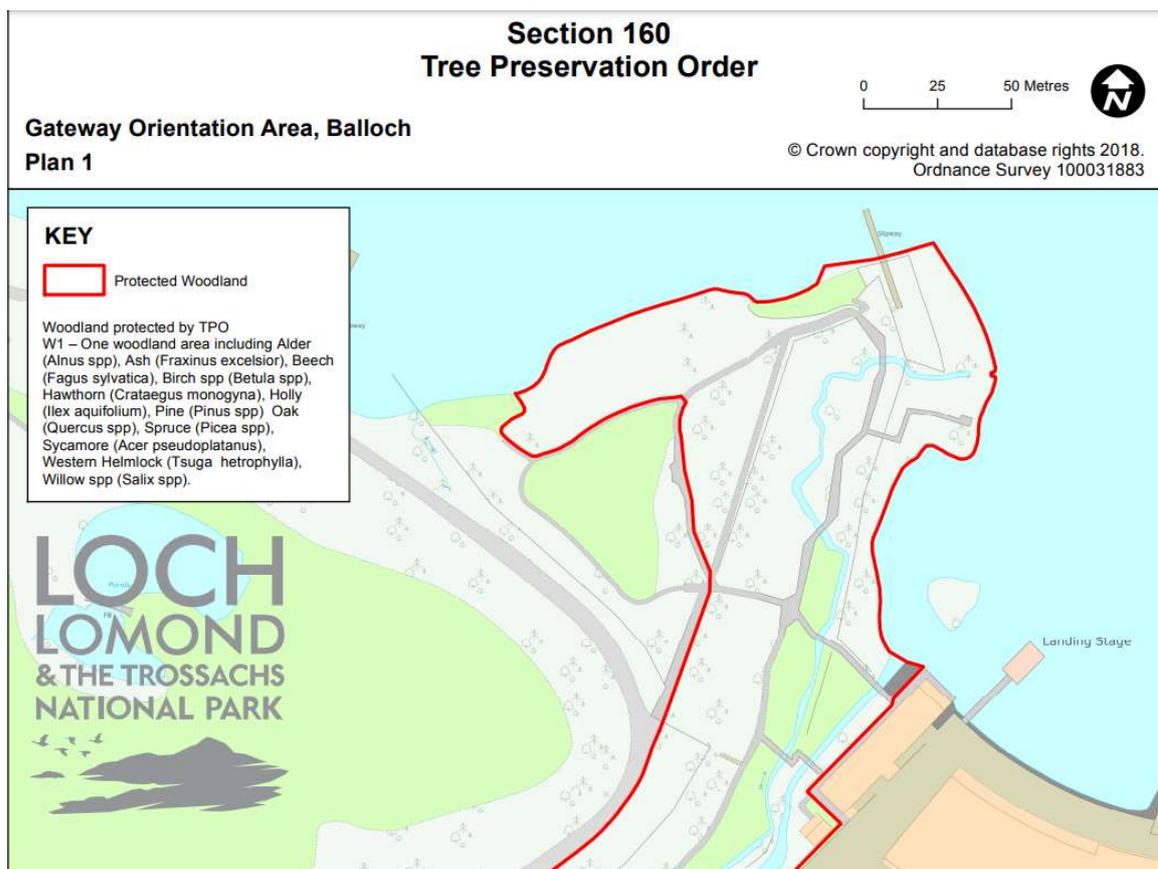
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- 4.11. The Loch Lomond and The Trossachs National Park Authority Tree Preservation Order No. 10 (2018) does include a section of the area within the EIA assessment area (see below image). This principally relates to the area of lochshore in the north west of the site.



- 4.12. As well as the various policies highlighted in the Scoping Report, impacts of the proposal in terms of the Scottish Government Control of Woodland Removal policy should form part of the considerations in the EIA.
- 4.13. It is also worth noting that Scottish Planning Policy 2014 (para 218, page 49) states that *“Woodland Removal should only be permitted where it would achieve significant and clearly defined additional public benefits”*. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the Control of Woodland Removal policy. This should be taken into account when preparing development proposals. If the principle of woodland loss can be appropriately satisfied then compensatory planting proposals to ensure no net loss of woodland and delivery at least of the equivalent woodland-related net public benefits should be detailed.
- 4.14. The woodland included in the proposed development site is a mix of ancient woodland and native woodland which are recorded on the Ancient Woodland Inventory and Native Woodland Survey of Scotland. A European Nature Information System (EUNIS) survey with target notes (in particular ancient woodland indicators which may require specific timing for surveys) should be included and this information along with mapped information should inform the assessment of woodland loss / development impacts.

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- 4.15. The previous glade survey had not considered the impact on ground flora of any proposed development. Such impacts should form part of the EIA assessment.
- 4.16. The woodlands within the development boundary form a key habitat link across the southern end of Loch Lomond and the EIA should include assessment of the impact of the development of this habitat link.
- 4.17. Outline woodland management proposals should be provided as part of the EIA. Given the prevalence to Ash dieback there should be consideration of maintaining sycamore as a component of the woodland as a suit of species to replace ash.
- 4.18. Scottish Forestry should be included as a key consultee.

Noise & Vibration

- 4.19. The Scoping Report notes that vibration associated with changes in traffic flows and the operation of the development are not likely to be significant and are therefore not proposed to be considered in the EIA. The response from WDC Environmental Health states that until the full development proposals are confirmed these potential effects will still require to be considered. It is suggested further consultation with WDC environmental health is undertaken with regard to inclusion (or otherwise) of these aspects during the course of developing proposals and the subsequent EIA assessment.
- 4.20. The likely noise and vibration impact of the proposed transport infrastructure should also be considered.
- 4.21. In assessing the likely vibration impacts from piling and other construction activities on receptors, the EIA should include the loch shore environment and specifically any habitat or species that are sensitive to vibration (reflecting advice from NS). This should cross reference the Ecology Chapter.

Air Quality

- 4.22. WDC Environmental Health has noted that the report refers to the 2016 Air Quality Progress Report. This should be updated to reflect the most up to date report which is available on the West Dunbartonshire Council website.

Ground Conditions & Geology

- 4.23. The response from WDC Environmental Health states that they will reserve comments on contaminated land for each area of development as and when planning applications are submitted.
- 4.24. WDC Environmental Health also suggests they have not been previously consulted with regards to the original ground investigation. They highlight that applications will likely require submission of up to date Site Investigation (SI) and we would therefore suggest further consultation with them to ascertain the extent of ground investigation work that would require to be incorporated within the EIA and/or accompany the application.

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Water, Hydrology & Flood Risk

- 4.25. SEPA advise that they are generally satisfied with the proposed approach to assessment however, they recommend that you should consult their detailed online scoping advice as the EIA is progressed.
- 4.26. Opportunities to incorporate improvements to avoid or offset environmental impacts as part of mitigation should also be explored. These include opportunities to daylight culverts and address recorded morphological pressures on the west bank of the Leven along the site boundary.
- 4.27. SEPA has also provided additional flood risk advice to which regard should be had when undertaking the EIA assessment.
- 4.28. The Scoping Report notes risks to the water environment during construction include activities on site such as: soil stripping; storage and placement; concrete pouring; and the use and storage of fuels and chemicals may increase the risk of pollutants (e.g. suspended solids, fuel, oils, and concrete) entering the watercourse, or shallow groundwater and being transported outwith the site. It is noted that an Environmental Management Plan (EMP) and Construction Method Statement (CMS) or Construction Environmental Management Plan (CEMP) are proposed separate from the EIA Report. The EIA report would need to state the broad prevention measures and best practice to be included within these documents to address these impacts as part of the mitigation.

Landscape & Visual

- 4.29. A full Landscape and Visual Impact Assessment should be prepared in accordance with Guidance for Landscape and Visual Impact Assessments (3rd edition, 2013). Reference should also be made to '*The Special Landscape Qualities of Loch Lomond and the Trossachs National Park (2010)*'. Draft guidance can be found on methodology here:- <https://www.nature.scot/national-scenic-areas-guidance-identifying-special-qualities-nsas>
- 4.30. Note that the Special Landscape Qualities are for the National Park in its entirety and not restricted to National Scenic Areas (NSAs). The general landscape qualities, which are overview qualities that apply to the entire National Park, should be assessed and also the specific landscape area of Loch Lomond taking particular note of south Loch Lomond.
- 4.31. The study area should include several viewpoints from Loch Lomond to inform on potential visual and landscape impact. The assessment associated with the previous application identified 21 viewpoints as representative of potential effects on landscape character and visual amenity. The viewpoint used previously for Balloch Country Park was not the most representative of potential landscape and visual effects and a revised viewpoint location should be selected in consultation with the National Park's Landscape Advisor. The Zones of Theoretical Visibility (ZTVs) clearly show potential visibility from Loch Lomond and the EIA screening and scoping report does not provide robust justification in support of not providing several viewpoints from Loch Lomond. Several additional viewpoints should be selected from the loch to advise on landscape and visual effect in addition to the viewpoint

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from Inchmurrin. Viewpoints from the loch should also include the potential landscape and visual effects of the proposed boat house area.

- 4.32. Note it will be necessary to include photomontages of summer and winter views. There should be liaison with the National Park over finalising viewpoints and as much detail as possible should be provided in the photomontages as opposed to massing studies. The likely significant effect on landscape and visual amenity from loss of vegetation necessary for development and construction is important for a realistic assessment.
- 4.33. A lighting management plan should be produced using guidelines from the Institute of Professional Engineers found here:- <https://theiip.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/> This should include for construction and also the proposed development.
- 4.34. All landscaping proposed as mitigation should include a predominance of native species and consider habitat connectivity and “habitat stepping stones”.

Archaeology & Heritage

- 4.35. The attached letter from Historic Environment Scotland (HES) sets out their requirements in relation to the built heritage and should be considered as forming part of this scoping opinion.
- 4.36. In summary, HES are content with the heritage assets within their remit which have been scoped in to the assessment (Woodbank House with Garden Building (LB1125), Loch Lomond, Drumkinnon Bay, Winch House including Slipway (LB46721) and Balloch Castle, Inventory Designed Landscape (GDL42), Balloch Castle, earthwork, Loch Lomond Park (Scheduled Monument, 3385)) and encourage further engagement with HES as the proposals develop. Please note also the various outdated or incorrect references highlighted by HES that should be addressed/corrected when undertaking the EIA.
- 4.37. The attached letter from WOSAS sets out their requirements in relation to archaeological survey work, studies and assessment. This has not been duplicated in this section, but should be included as forming part of the National Park’s scoping opinion.
- 4.38. In summary WOSAS agrees that the scoping report has identified the heritage assets within the vicinity of the application site and correctly identifies that potential effects on these elements that should be scoped in for further assessment. They recommend updating / reviewing archaeological sources and re-visiting sites that have not been visited since the previous assessment (December 2016).
- 4.39. You will note that the response outlines the requirement for a written scheme of investigation as a planning condition and that a programme of post-excavation analysis may also be needed along with a programme of Historic Building Recording in connection with Woodbank House and associated assets.

Traffic & Transport

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- 4.40. WDC Roads Services advised that detailed predicted trip generation figures are required. Traffic generation should use industry standard algorithms, showing how the existing road infrastructure would be affected by any increase in traffic. This study should also take account of any permitted developments (see Section 5 on cumulative impacts).
- 4.41. It is accepted that during the Covid 19 Pandemic current travel patterns could vary from typical levels both post and pre Pandemic. The applicant may wish to consider using baseline traffic count data from the previous application, and add estimated trip generation figures for the proposed site to establish the net effect on the road network. From there, WDC Roads Services can establish what measures (if any) are necessary to allow the network to perform satisfactorily.
- 4.42. Active travel methods should be explored from local areas, in terms of employment journeys with potential barriers identified with mitigation measures suggested. Any detrimental effect to traffic flows should be factored into the algorithm on effects to the road network use levels. Public transport use should be maximised with incentives explored as to how this can be achieved (e.g. discounted travel for entry tickets etc.).
- 4.43. Transport Scotland were consulted however they do not respond to EIA scoping requests. The EIA should therefore consider the potential impacts on the trunk road network as set out in the report and Transport Scotland will be consulted on this upon submission of the planning application.
- 4.44. Please note that where the report refers to 'Balloch Road' housing estate, this should be referred to in the EIA as 'Drumkinnon Gate'.

Socio-Economics, Tourism & Recreation

- 4.45. The scoping report notes that the baseline section of the assessment will identify and describe all designated routes within 10 km of the development site and these routes will be assessed as public access receptors within the Traffic & Transport ES chapter. However, the methodology for the Traffic & Transport ES chapter does not seem to explicitly include assessment of impacts on rights of way and core paths and public access more generally. It is suggested that the Socio Economic Chapter consider public access with cross reference, if and where relevant, to the Traffic & Transport ES chapter.
- 4.46. It is recommended that 'Access' is explicitly stated in the topic heading 'Socio-economics, Tourism and Recreation' for ease of reference (*i.e.* "Socio-economics, Tourism and Recreation (including Access)").
- 4.47. Accessibility to, and any impacts of, the proposed development on public and core paths during the construction and operation phases should be clearly identified and assessed within this chapter (*i.e.* in the section on effects on visitor and leisure infrastructure). The assessment should particularly consider impacts on core paths and rights of way but also areas that presently provide unhindered movement and informal routes that may not be designated. In particular, the woodlands and loch-side beaches are popular with visitors and residents. Beach side recreation (alongside the Maid of the Loch slipway & NE Drumkinnon Bay) is well-established largely due to convenient access, high quality views and a gradually

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sloping beach / shallow water – they are especially valued as a paddling sites for children, swimmer entry/exit points and canoe launching. The assessment should consider the potential actual and perceived barriers to public access that may arise in relation to the proposed development and propose suitable mitigation to maintain and support barrier-free public access.

- 4.48. The site includes the peninsula forming the NW part of Drummkinnon Bay – an area supporting modest levels of recreational access. The EIA process should consider any associated impacts on this present use and opportunities to retain and enhance public access.
- 4.49. The scoping report suggests that the socio economics, tourism and recreation chapter would consider views from the public/core paths. To avoid repetition with the landscape and visual chapter, the visual effects relating to the recreation network need not be scoped into this chapter and can instead be assessed within the Landscape and Visual chapter. The assessment of the impacts on the recreation network in this chapter ought to focus on visitor numbers and identify any pressures or conflicts that may arise.
- 4.50. Consultation should be undertaken with the Loch Lomond and Trossachs Access Team who have responsibility for rights of way/core paths and access within the National Park. I would also refer you to their previous comments provided in respect of application 2018/0133/PPP.

Other Matters

- 4.51. The final chapter of the scoping report refers to ‘other matters’ which do not fit easily into the chapters; namely environmental impacts on human health. Given the operational nature of the proposed development is not of a hazardous nature it is considered that effects on human health are not likely to be so significant so as to warrant assessment in its own chapter. However, any indirect impacts on health identified ought to be addressed in each of the chapters as relevant to the subject. For instance, any effects on health that may arise as a result of contaminated land should be dealt with in the ground conditions and geology chapter. Potential effects arising from contamination of waters (e.g. water sources for human consumption) should be dealt with in the water quality, hydrology and flood risk chapter.
- 4.52. In respect of the latter please note the response from Scottish Water which identifies a ‘drinking water protection area’ with abstraction in the vicinity of the proposed development. The EIA should assess and mitigate for any potential impacts in relation to water quality that may affect the water source for the abstraction.

5. CUMULATIVE IMPACTS

- 5.1. The proposals must be considered together with other development in the wider area. At the time of writing the only other significant development is a proposed 39-unit affordable housing development on Dumbain Road, Balloch (2019/0175/DET). This is due to be heard at a Local Review Board in the coming weeks (ref. 2021/0002/REVREF). If the appeal is allowed this development should be taken into account in the Traffic and Transport assessment.

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- 5.2. There are no other known significant terrestrial development proposals within the immediate area of the National Park.

6. RATIONALE FOR THE SCHEME AND SITE SELECTION

- 6.1. The EIA process includes a statutory requirement for the consideration of alternatives. In the context of this application, the consideration of different sites, layouts and designs should be demonstrated and the rationale for the selection of the proposed development site provided. If there is no alternative then the application needs to say why this is so. The impact of different siting and design options on the landscape should be analysed, and a clear rationale for the proposed site, layout and design should be provided in environmental terms and with particular reference to landscape and design.

7. NON TECHNICAL SUMMARY

- 7.1. As per the Regulations, a Non-Technical Summary, written in simple, non-technical language, should accompany the Environmental Impact Assessment. This should describe the options for the proposed development and the mitigation measures that would be employed to offset the environmental impacts that would result from the proposed development.

8. CONCLUSION

- 8.1. I trust that this Opinion will be of assistance to you in carrying out the Environmental Impact Assessment. Please note that I have not repeated all the advice of external consultees (see attached) within this letter however they should be considered as part of this scoping opinion.
- 8.2. Please do not hesitate to contact me in the first instance, should you wish to discuss any aspects further. You should also note that this Scoping Opinion, and the associated specialist comments attached, is provided without prejudice to the future consideration or determination of the Planning Application by National Park Authority officers or Members.

Yours sincerely,

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Development Management Planner

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Appendix 1**THE TOWN AND COUNTRY PLANNING ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017****SCHEDULE 4- INFORMATION FOR INCLUSION IN ENVIRONMENTAL IMPACT ASSESSMENT REPORTS**

1. A description of the development, including in particular:

- a) a description of the location of the development;
- b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
- c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
- d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in Regulation 4(3) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:

- a) the construction and existence of the development, including, where relevant, demolition works;
- b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
- c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
- d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
- e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
- f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
- g) the technologies and the substances used.

The description of the likely significant effects on the factors specified in Regulation 4(3) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term,

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medium- term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project [including in particular those established under Council Directive 92/43/EEC3 and Directive 2009/147/EC].

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

9. A non-technical summary of the information provided under paragraphs 1 to 8.

10. A reference list detailing the sources used for the descriptions and assessments included in the EIA report.

