



Lomond Banks

Environmental Impact Assessment Report: Addendum January 2023

On behalf of **Flamingo Land Ltd.**



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This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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1 Introduction

Summary of Amendments:

Changes to this Environmental Impact Assessment Report (EIAR) (originally submitted as part of an application for Planning Permission in Principle on 16 May 2022) have been made in response to the letter from Loch Lomond and the Trossachs National Park dated 17th November 2022 which requested further supplementary information. Updates have also been made to take account of the Design changes that have been made to reduce the scale of development. Specific changes have been made to the following sections:

- Section 1.4 Proposed Development
- Section 2.5 The Proposal
- Section 4.3 National Planning Policy
- Chapter 5 Ecology
- Chapter 6 Trees and Woodland
- Chapter 11 Landscape and Visual
- Chapter 13 Archaeology and Cultural Heritage

1.1 Introduction

1.1.1 This Environmental Impact Assessment Report (EIAR) Addendum has been prepared by Stantec UK Ltd (Stantec) on behalf of Flamingo Land Ltd ('the Applicant') in relation to planning application 2022/0157/PPP previously submitted to Loch Lomond and the Trossachs National Park Authority (LLTNPA) for a proposed tourism and leisure-led mixed-use development ('the proposed development') on land at West Riverside and Woodbank House, Balloch ('the site'). The development of both areas of the site is collectively known as 'Lomond Banks'. Planning application 2022/0157/PPP seeks planning permission for the proposed development and was validated by the plan.

1.1.2 The development of both areas of the site is collectively known as 'Lomond Banks'. The PPI application and this EIAR are submitted to the Loch Lomond and the Trossachs National Park Authority (LLTNPA) as the relevant Determining Authority. Details of the project team are provided in **Section 1.8** below.

1.2 Purpose of EIAR Addendum

1.2.1 The purpose of this EIAR Addendum is to provide a proportionate assessment of any new or different likely significant environmental effects resulting due to presently proposed changes to the proposed development (i.e. likely significant effects from the proposed amended scheme), compared with the environmental effects already assessed within the original EIAR (i.e. likely significant effects from the original scheme).

1.2.2 This EIAR Addendum forms part of an EIA carried out in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended (the 'EIA Regulations') that are applicable to the determination of the PPI application for the proposed development.

1.2.3 **Table 1-1** outlines what EIAR chapters have been updated and what Supplementary Information is being provided.

Table 1-1: Supplementary Information Summary

EIAR	Submission	Action
EIAR Chapters 1 to 4		Not updated other than details of proposal.
EIAR Chapter 5 - Ecology	EIAR Addendum Chapter 5 and associated Technical Appendices	Updated
EIAR Chapter 6 - Trees & Woodland	EIAR Addendum Chapter 6 and Technical Appendix	Updated
	Design Statement section on Compensatory Planting	Updated
EIAR Chapters 7 to 10	Chapter 7 - Chapter 8 - Chapter 9 - Chapter 10 -	Not updated other than details of proposal.
Chapter 11 - Landscape & Visual Impact	EIAR Addendum Chapter 11 and associated Technical Appendices including Visualisations	Updated and includes resubmission of Visualisations submitted in August 2022
Chapter 12 - Traffic & Transport		No update required to EIAR.
EIAR Chapter 13 – Archaeology & Cultural Heritage	EIAR Addendum Chapter 13	Updated
EIAR Chapter 14		Not updated other than details of proposal.
EIAR Chapter 15 – Impact Interactions		Updated
EIAR Non-Technical Summary (NTS)	EIAR NTS to ensure compliance with EIA & Planning Regs	Updated

1.3 The Site

- 1.3.1 The proposed development site measures 18.2ha of land, situated to the north of the town of Balloch at the southern tip of Loch Lomond. The proposed site contains two distinct areas, known for the purposes of this EIAR and the PPIP application as West Riverside and Woodbank House respectively. West Riverside encompasses the south-western bank of the River Leven at its confluence with Loch Lomond and extends to the eastern boundary of Drumkinnon Wood. Woodbank House comprises the remains of the Grade A Listed Woodbank House Hotel and its associated structures and grounds.
- 1.3.2 A detailed description of the proposed site and surrounding area is provided in **Chapter 2** of this EIAR along with a Site Location Plan provided as **Appendix 2.2** of **Volume 2 – Appendices**.

1.4 The Proposed Development and Proposed Changes

- 1.4.1 The site at West Riverside and Woodbank House offers a significant opportunity for a tourism, leisure and recreation-based development on the doorstep of one of Scotland's key visitor destinations, Loch Lomond.
- 1.4.2 The proposal aims to create a quality, accommodation-led destination comprising of hotel and lodge accommodation along with family orientated accommodation and leisure activities. Details regarding the rationale for the proposed development at this location is provided within **Chapter 2** of this EIAR Addendum and the associated Planning Statement.
- 1.4.3 The proposed development comprises the erection and operation of a tourism, leisure and recreation led mixed-use development. Taking account of all of the proposed changes, the updated description of proposed uses is as follows:
- Refurbished tourist information building;

- 60-bedroom apart-hotel;
- 32-bedspace budget hotel;
- Up to 104 self-catering lodges comprised as follows;
 - Up to 42 single story woodland lodges (West Riverside);
 - Up to 37 countryside lodges (in grounds of Woodbank House);
 - Up to 25 woodland lodges (in grounds of Woodbank House);
- Reconstruction and refurbishment of Woodbank House to provide up to 15 Self-catering apartments;
- Reconstruction and refurbishment of the attendant structures at Woodbank to provide up to 6 self-catering units;
- Leisure pool / water park / spa facility;
- Water sports hub;
- Water sports equipment storage building;
- Restaurants / café / retail areas;
- Craft brewery including pub;
- Visitor reception area and hub building including indoor attractions;
- External activity areas including event/performance areas, children’s play areas, picnic and barbeque areas;
- Monorail;
- Staff service and welfare accommodation;
- Associated parking, landscaping and infrastructure development works; and,
- Access from the surrounding road network including Ben Lomond Way and Pier Road.

Summary of Changes

Table 1-2: Updated Lodge Accommodation Schedule

Areas	Lodge Numbers as Per PPIP Submission May 2022	Updated Proposed Lodge Numbers
Zone A – Station Square	0	0
Zone B – River Front	42	42
Zone C – Pierhead	0	0
Zone D – Boathouse & Staff Area	0	0
Zone E – Woodbank	84 inc, 17 bothies	62 (-17 bothies and 5 lodges)
Total	126	104

Table 1-3: Updated Scheme Per Area of Site

Zone	Change
Zone A – Station Square	Parking increase of 4 spaces from 132 to 136
Zone B – Riverside	No change
Zone C - Pierhead	Parking increase of 4 spaces from 99 to 103
Zone D – Area 10 – Staff Facilities	All proposed development removed and red line boundary adjusted.
Zone E – Woodbank	All 17 Woodland Bothies removed; 5 Woodland Lodges south of Woodbank House removed. Non-native and invasive species removed and replaced with native species planting and trees, Parking increased by 6 from 127 to 133

- 1.4.4 The proposed development includes the retention of the Grade A Listed Woodbank House. The conservation and redevelopment of the listed structures within the site will be subject to future applications for Planning Permission and Listed Building Consent (LBC).
- 1.4.5 As the applicant is seeking PPiP, the proposed development comprises a suite of key parameters within which the detailed design of the proposed development will be finalised at the detailed design stage. The final design should remain within these key parameters and ensures the likely ‘worst case’ effects have been considered when assessing the environmental impact of the proposal.
- 1.4.6 A detailed description of the proposals key parameters is provided in **Chapter 2** of this EIAR Addendum. This is supported by a Parameters Plan, provided as **Appendix 2.1** in **Volume 2 – Appendices**. This is also the key plan for which PPiP is being sought. Other plans submitted within this EIAR and the PPiP application are indicative and provided for illustrative purposes only.

1.5 Terms and Definitions

1.5.1 For ease of reference, the following terms have been used in the EIAR:

- The site – the area within the PPiP application boundary which this EIAR relates to, as outlined in red on the Site Location Plan (**Figure 2-1**) within Volume 2 – Technical Appendices;
- West Riverside and Woodbank House – the two distinct areas of land which together comprise the site;
- The proposed development – the erection and operation of a tourism and leisure-led mixed-use development as summarised in Section 1.4 above and detailed within **Chapter 3** of this EIAR;
- The Applicant – Flamingo Land Ltd;
- The PPiP application - the application for planning permission in principle being submitted on behalf of the Applicants for the proposed development; and,
- The EIA Regulations – the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended.

1.6 The EIAR and Related Documents

- 1.6.1 This EIAR presents the findings of an EIA undertaken for the proposed development in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended, referred to as ‘the EIA Regulations’.
- 1.6.2 Running concurrently with the design process the EIAR has sought to:
- Identify the likely environmental effects of the proposed development;
 - Define appropriate design and construction measures and good practice to mitigate likely significant adverse environmental effects and maximise opportunities for environmental enhancements resulting from the construction and operation of the proposed development; and,
 - Determine the significance of the likely residual environmental effects from the proposed development remaining identified mitigation and enhancement measures have been taken into account.
- 1.6.3 The EIAR comprises the following volumes:
- **Volume 1** – Main Report;
 - **Volume 2** – Appendices; and,
 - Non-Technical Summary (NTS).
- 1.6.4 The other principal documents submitted with the planning application include:
- Drawings (illustrative);
 - Design & Access Statement;
 - Pre-Application Consultation Report (PAC);
 - Planning Statement;
 - Transport Assessment;
 - Flood Risk Assessment;
 - Drainage Assessment;
 - Topographical Plan;
 - Structural Inspection Report Woodbank House & Stables; and,
 - Conservation Inspection Report.

1.7 Stakeholder Consultation

- 1.7.1 A programme of consultation has been undertaken and it has informed the design of the proposed development and the EIA reported in this EIAR:
- Following a request submitted by Stantec on behalf of the Applicants, a formal EIA scoping exercise was co-ordinated by LLTNPA in Summer 2020 seeking the views of consultees (statutory and non-statutory) regarding the required scope of the EIA for the proposed development. The resulting EIA Scoping Opinion, issued by the LLTNPA in October 2020 has guided the preparation of this EIAR and is provided in full as **Appendix 3.1** in **Volume 2 – Appendices**;

- Post-scoping consultation has been undertaken with individual consultees to clarify points noted within LLTNPA's EIA Scoping Opinion, to inform the emerging layout design of the proposed development and agree the detailed scope of the assessment presented in this EIAR. Details of these consultations are provided in **Subsection 3 – Methodology** of each assessment presented in **Chapters 5 – 14** of this EIAR; and,
- In addition, a programme of public consultation has been undertaken, pursuant to the pre-application consultation requirements prescribed within Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 for all proposed 'major' developments, of which the proposed development is one. Full details of this pre-application consultation and how it has informed the layout design of the proposed development are provided within a separate **Pre-Application Consultation (PAC) Report** prepared by Stantec on behalf of the Applicants. Relevant environmental issues raised through pre-application consultation activities are however addressed within the assessments presented in **Chapters 5 – 14** of this EIAR.

1.8 Project Team

1.8.1 The organisations involved in the preparation of this EIAR and PPIp are listed below:

- **Stantec** – EIA Co-ordination, Planning, Noise & Vibration. Air Quality, Ground Conditions & Geology, Water, Hydrology & Flooding, Traffic & Transport, Socio Economics, Tourism, Recreation & Access;
- Applied Ecology – Ecology;
- **Julian A Morris** - Trees & Woodland;
- **Gillespies** – Landscape and Visual Impact; and,
- **Headland Archaeology** – Archaeology & Cultural Heritage.

1.8.2 The wider project team involved in the preparation of the PPIp application for the proposed development also includes:

- Anderson Bell + Christie Architects – Project Architects;
- Stantec – Planning Agent, Civil Engineering, Site Investigation (SI) Co-ordination, Pre-Application Consultation;
- Tiger Bond – Public Relations;
- Streets UK - Community Engagement; and,
- Cowal Design – Engineering review.

1.8.3 Full details of the project team are provided in **Appendix 1.1**.

1.9 Structure of the EIA Report

1.9.1 The remainder of this EIAR is structured as follows:

- **Volume 1** – Main Report;
- **Chapter 2:** detailed description of the site and the surrounding area; the proposed development, including infrastructure and the consideration of alternatives;
- **Chapter 3:** provides the methodology and assessment methods used to undertake the EIA;

- **Chapter 4:** summarises the planning and policy context to the proposed development;
- **Chapters 5 to 14:** comprise the technical assessment chapters which document the aspects of the environment likely to be significantly affected by the proposed development and describes the likely significant effects of the proposed development (Ecology; Trees & Woodland; Noise and Vibration; Air Quality; Water, Hydrology and Flood Risk; Ground Conditions and Geology; Landscape and Visual; Traffic & Transport; Archaeology & Cultural Heritage; Socio-economics, Tourism & Recreation);
- **Chapter 15:** provides an assessment of impact interactions;
- **Chapter 16:** provides a consolidated schedule of all identified mitigation measures and monitoring requirements;
- **Chapter 17:** provides a glossary of term;
- **Volume 2** –Technical Appendices (1.1 to 14.3); and,
- Non-Technical Summary (NTS).

2 Site and Proposed Development

2.1 Introduction

- 2.1.1 This chapter outlines the key environmental characteristics of the site and the surrounding area which have informed the EIA being undertaken for the proposed development. Details of the characteristics and sensitivities of the individual receptors which have been identified within relevant Study Areas and used to assess likely environmental effects from the proposed development are then provided in **Subsection 4** of **Chapters 5 – 14**.

2.2 The Site

Site Overview

- 2.2.1 A high-level description of the West Riverside and Woodbank House areas of Lomond Banks is provided below. Further details regarding individual potential receptors and sensitive areas within the site are identified within the **Baseline sub-section** of each technical assessment presented in **Chapters 5 – 14**.

Site Location and Context

- 2.2.2 The proposed site is located to the north of Balloch, and it contains two distinct areas, known respectively as West Riverside and Woodbank House. The site is referred to in full as 'Lomond Banks. It is approximately 18.2ha of land, at the southern tip of Loch Lomond. A Site Location Plan, showing the PPIP application red line boundary delineated in red and other land under the control of the applicant in blue, is provided within **Appendix 2.2**.

West Riverside

- 2.2.3 The West Riverside site is bounded by the River Leven to the East, Loch Lomond Shores and Loch Lomond to the North, Old Luss Road and Ben Lomond Way to the west and Balloch Road and the houses in Clairinsh to the South.
- 2.2.4 The West Riverside area is heavily influenced by the immediately adjacent Drumkinnon Woods and other pockets of landscaped woodland, amenity areas and car parks are in the north of the site and to the east of the existing Loch Lomond Shores complex. The site is therefore constrained to the north and east by the River Leven, Drumkinnon Bay and by Loch Lomond itself.
- 2.2.5 West Riverside is a short walking distance from Balloch Train Station – which currently provides a half hourly service to Glasgow and Lanarkshire on the North Clyde line. The station is limited in terms of size/scale, covered waiting area and passenger facilities, and only one platform.
- 2.2.6 The John Muir Way runs through the proposed site. The site is also situated close to National Cycle Route 7.
- 2.2.7 An oil pipeline operated by INEOS runs east-west through the northern portion of the West Riverside area of the site parallel with Ben Lomond Way. The exact location of the route is visible via pipeline markers and two fenced off areas in the north east near the junction of Ben Lomond Way and Pier Road – these are valve gear / headworks associated with the pipeline. The pipeline then turns north to the west of Loch Lomond and does not intrude into the Woodbank House area.

Woodbank House

- 2.2.8 Woodbank House comprises the remains of the A Listed Woodbank House Hotel, outbuildings and gardens including estate walls. The area is situated immediately to the west of Old Luss Road and approximately 500m east of the A82.
- 2.2.9 The buildings which comprise this former hotel are in a ruinous state as a result of two fires (at the main hotel building) and subsequent dereliction. The land and gardens surrounding the house consist of woodland and slope steeply upwards from the Old Luss Road towards the A82.

To the front of the Woodbank House, between it and the Old Luss Road, is an area of open grassland, currently used for grazing.

Access

- 2.2.10 Access is via several existing minor roads running through the site including Pier Road and Ben Lomond Way. These connect to Balloch Road and a number of roundabouts linking motorists from the A811 Stirling Road and the A82 trunk road network.
- 2.2.11 The A82 provides the principal access route to the west of Loch Lomond, other parts of the Loch Lomond and The Trossachs National Park, Argyll & Bute and the North West Highlands. This trunk route is strategic in nature and is maintained by Transport Scotland.
- 2.2.12 The site is a short walking distance to Balloch Train Station, which at present provides a half hourly service to Glasgow and Lanarkshire on the North Clyde line. The station is limited in terms of size/scale and has a limited covered waiting area and passenger facilities, with only one platform.
- 2.2.13 The site is situated very close to National Cycle Network Route 7 and the John Muir Way. These established routes will be secured and proposed to be enhanced by the development to ensure that connections from these routes are utilised and enhanced.

Environmental Characteristics

West Riverside

- 2.2.14 The West Riverside area is immediately east of Drumkinnon Woods. This semi-natural woodland is an undulating landform and is dissected by footpaths. The woodland is bounded to the west and north by roads accessing Loch Lomond Shores and the pier. Part of the woodland is designated as Ancient Woodland (long-established of plantation origin). The woodland supports a range of flora and fauna.
- 2.2.15 SEPA's Indicative Flood Maps indicate that the northern part of the site surrounding Balloch Pier and the western banks of the River Leven running through the site are located within the 1 in 200-year return period flooding envelope (medium likelihood of flooding). However, a flood study of the river undertaken by Jacobs¹ which provides a more detailed outline of the modelled flood extents along the river highlights that the northern part of the site from the existing roundabout on Pier Road and above, would in fact be inundated in the 1 in 200-year return period event, and more substantially in the 1 in 500-year return period event. Only a small strip of land along the banks of the River Leven through the site would be affected by flooding.

Woodbank House

- 2.2.16 The Woodbank House area of the site is not indicated as susceptible to river flooding on SEPA's indicative flood maps. There are areas shown as being at potential risk of surface water flooding that coincide with the two small watercourses running through this area from the hills to the west and into Loch Lomond.

Existing Land Uses and Activities

- 2.2.17 **Table 2-1** below identifies all existing land uses and activities known to be present either within the site or along its boundaries. In accordance with the embedded mitigation set out in **Section 2.11**, continuity of access to these receptors is proposed to be maintained throughout the construction and operational phases of the development.

¹ Jacobs 2009, River Leven Flood Study Review & Update of Original Work

Table 2-1: Existing Land Uses and Activities Within the Site

Receptor Type	Existing Uses and Activities
Recreational routes	Loch Lomond Shores Walk, John Muir Way, Three Lochs Way, National Cycle Route 7, West Loch Lomond Cycle Path, Regional Cycle Route 40.
Tourism, Recreation and Leisure	Maid of the Loch, Sweeney's Cruises, Tourist Information Centre (Balloch VisitScotland Centre), Tour Boats, Sealife Centre, Loch Lomond Bird of Prey Centre, TreeZone aerial adventure course, Pier head users (swimming, fishing, canoeing, rowing, water-skiing, bike & boat hire etc).
Other	Loch Lomond Shores including all operators currently within complex, National Park ranger's office at Pierhead.

2.3 The Surrounding Area

2.3.1 Given the site's location within the National Park, it is proximate to numerous tourism and recreation resources/receptors, including: Loch Lomond, Ben Lomond, Luss, River Leven and Balloch itself (with particular reference to visitor-related business activity and the accommodation sector). The closest visitor attractions to the site are:

- Loch Lomond Shores, a retail and leisure development situated immediately to the north west;
- The Loch Lomond Steamship, berthed at Balloch Pier within the northern extent of the development site;
- Loch Lomond Birds of Prey Centre, located within the Loch Lomond Shores complex;
- Balloch Castle and Country Park are situated east of the development site across the River Leven; and,
- Other visitor attractions and tourism developments are located at greater distance within Balloch and along the shores of Loch Lomond.

2.3.2 Relevant environmental characteristics and sensitivities in the surrounding area are identified as potential receptors within the technical assessments presented in **Chapters 5 – 14**.

2.4 Cumulative Development

2.4.1 The EIA Regulations require likely significant cumulative effects from a development proposal in combination with other existing or proposed developments to be described within an EIAR. Details of relevant existing, approved and proposed developments which have been considered in this EIAR are provided below.

2.4.2 All of the selected cumulative developments in **Table 2-2** are located within close vicinity of the site. These cumulative developments have been included within cumulative impact assessments provided in **Subsection 10** of each technical assessment presented in **Chapters 5 – 14**.

Existing Development

2.4.3 Existing development is considered as a receptor and/or impact source where relevant within each technical assessment through **Chapters 5 – 14**.

Approved & Proposed Development

2.4.4 **Table 2-2** below identifies the approved and proposed developments which have been considered in this EIAR.

Table 2-2: Relevant Approved and Proposed Developments

Planning Application Reference	Overview
Riverside Leisure Ltd 2021/0146/DET	Replace fixed jetties providing 50 moorings with floating pontoons providing 48 moorings -at River Leven, adjacent to Riverside Boatyard Dalvait Road Balloch.
Balloch Street Design Project	The Balloch Village Plans (Street Design) Project builds on the engagement undertaken through the 'Live in Balloch' Charrette process in February and March 2016.
Sweeney Cruises 2021/0426/DET	Proposed installation of pontoons West Side of River Leven South of Lomond Road Bridge Balloch.
Lomond Park Hotel 2020/0266/DET	Demolition of hotel and public house and erection of mixed -use development comprising 26 flatted residential dwellings (Sui Generis) with ground floor retail units (Class 1) Lomond Park Hotel Balloch Road Balloch.

2.5 The Proposal

2.5.1 The proposed development comprises the erection and operation of a tourism and leisure-led mixed-use development at the site, including:

- Refurbished tourist information building;
- 60-bedroom apart-hotel;
- 32-bedspace budget hotel;
- Up to 104 self-catering lodges of various sizes;
- Reconstruction and refurbishment of Woodbank House to provide up to 15 Self-catering apartments;
- Reconstruction and refurbishment of the attendant structures at Woodbank to provide up to 6 self-catering units;
- Leisure pool / water park / spa facility;
- Water sports hub;
- Water sports equipment storage building;
- Restaurants / café / retail areas;
- Craft brewery including pub;
- Visitor reception area and hub building including indoor attractions;
- External activity areas including event/performance areas, children's play areas, picnic and barbeque areas;
- Monorail;
- Staff service and welfare accommodation;
- Associated parking, landscaping and infrastructure development works; and,
- Access from the surrounding road network including Ben Lomond Way and Pier Road.

- 2.5.2 The proposed development also includes the remains of the Grade A listed Woodbank House and attendant structures. The conservation and redevelopment of the Woodbank House façade and other listed structures within the site will be subject to future applications for planning and listed building consent.
- 2.5.3 As the Applicants are seeking PPIp rather than full planning permission, at this stage the proposed development comprises a suite of key parameters, within which the detailed design of the proposed development will be confirmed later. This EIA has therefore been undertaken using a ‘Rochdale Envelope’ approach, with each technical assessment assessing the likely worst-case effects from the construction and operation of the proposed development according to the defined key parameters. These key parameters include land use blocks and maximum building floor areas and heights, as shown on **Appendix 2.1 – Parameters Plan**.

2.6 Key Characteristics of Proposal

Demolition

- 2.6.1 For the avoidance of doubt, no demolition is proposed as part of the PPIp and has therefore not been assessed in this EIAR.

Tree-Felling

- 2.6.2 Targeted tree removal is proposed at the pier head area and, following a tree survey, within Woodbank area of the site to remove trees unsuited for long term retention. In other parts of the site, the principle of avoidance of tree clearance has been adopted.
- 2.6.3 The approach to targeted tree removal and proposed compensatory planting is assessed and detailed fully within the technical assessment presented in **Chapter 6 – Trees and Woodland**.

Buildings

- 2.6.4 The Parameters Plan (**Appendix 2** within **EIAR Volume 2**) separates the site into five distinct ‘Development Zones’ (Zones A, B, C, D and E) as well as overarching components. These zones and land uses with associated key parameters as defined on the Parameters Plan, represent the proposed development for the purposes of this PPIp and EIA. Each development parameter is to allow some flexibility in the final design and layout of buildings and structures. The developments zones are as follows:

Table 2-3: Development Zones

Development Zone	Area	Land Use/Class	Floor Space/ Units
Zone A – Station Square	1	Brewery incl. pub -	1,200 sqm inc 300m ² pub
		Restaurant – Use Class 3	150 sqm
		Budget hotel – Use Class 7	32 bedrooms
		Amphitheatre area	Temporary tent structure
Zone B – Riverfront	3a	Refurbished tourist office	
		Enhanced public square	
		Woodland Lodges	42 lodges (max)
Zone C - Pierhead	4a	Picnic, BBQ & Play Areas	
		Path Network	
Zone D – Drumkinnon Wood & Bay	5	Managed Woodland with SUDs	2 SUDs attenuation ponds
		Apart Hotel & Restaurant – Use Class 7 & 3	60 bedrooms 150 sqm restaurant
		Water Park – Use Class 11	
		Visitor Hub	Indoor attractions, storage & office
Zone D – Drumkinnon Wood & Bay	6	Visitor Attraction & Car Park	
		Multi-User Public Realm	
		8 & 4b	Managed Woodland Area
Zone D – Drumkinnon Wood & Bay	3c	Boathouse equipment storage	95 sqm

Development Zone	Area	Land Use/Class	Floor Space/ Units
	11	Buffer Zone	12m deep around dwellings at Drumkinnon Gate
Zone E - Woodbank	13	Woodbank House conversion to holiday apartments	15 units (Max)
		Woodland Stable and Bothy converted to self-catering holiday properties	6 units (max)
	3d	Lodges within existing field	37 lodges (max)
		Lodges within woodland	25 lodges (max)

2.6.5 The siting and detailed design within each zone will be subject to further consideration through the submission of applications for approval of matters specified by condition (AMSC applications) after any PPIP is approved. At this stage, the EIAR does not assess the potential effects from any detailed siting or design.

Other Infrastructure & Structures

2.6.6 In addition, the Parameters Plan also proposes the following uses and structures across the site:

- New car parking 372 spaces;
- Site Vehicular/Boat Access Points (Existing, maintained);
- Pedestrian/cycle linkages;
- Monorail – from Station Square to Pierhead (3.5m high to 5.5m high); and,
- Monorail stations – Station Square & Aparthotel.

Landscaping

2.6.7 A number of general landscape design principles have been developed as part of the landscape strategy that is described within the Design Statement accompanying the PPIP application. These principles seek to guide the implementation of a suitable landscape scheme for the proposed development that protects and enhances the existing landscape.

2.6.8 The proposed development seeks to provide landscape buffers and native planting to help set the development in its locality. Landscape buffers have been set at depths that respond to the adjacent current and proposed future land uses, with larger buffers close to sensitive receptors. For example, a 12m landscape buffer is proposed between the proposed development and the existing Drumkinnon Gate residential area to the south.

Ecology

2.6.9 A range of measures describing key working methods and timings to avoid/minimise ecological effects during construction will be delivered through a Construction Environmental Management Plan (CEMP) and protected species licences (where required) will be overseen by an appointed Ecological Clerk of Works (ECoW). These licences will be obtained in advance of construction, and detailed mitigation measures would be agreed during the licensing process with the respective licensing authority.

Existing Pipeline Infrastructure

2.6.10 The proposed development allows for the INEOS oil pipeline infrastructure (2 main pipes and fenced valve areas) to be retained within the site. A 3m stand-off on each side of the infrastructure have been proposed for health and safety purposes and to allow access for maintenance.

Access and Parking

Vehicular Access

- 2.6.11 The main access to the site will be via Ben Lomond Way (existing main access to Loch Lomond Shores) and Pier Road, an existing, secondary access to Pierhead, Maid of the Loch and slipway activities. Woodbank House is accessed via Old Luss Road and the reformation of an existing priority access junction.
- 2.6.12 Pier Road will be used for access to the newly proposed car park to the west of Pier Road, which is intended to cater for the land uses included within the Zone A - Station Square proposals. Ben Lomond Way will be promoted as the main access to the wider site to ensure strategic and site-bound traffic is removed from the local road network.
- 2.6.13 A signage and wayfinding strategy will be developed for the wider site at the detailed design stage. It is expected that a combination of enhanced signage and Variable Message Signing (VMS) will need to be installed at key approaches to the site, as well as internally within the site, to ensure effective vehicular movement for internal destinations and appropriate directions to the relevant car parking areas.
- 2.6.14 For accommodation land uses, except for the Woodbank House site, the arrivals and parking for this element can be managed from the point of booking, whereby visitors can be advised of the intended arrival and check-in arrangements. It is intended that parking for the visitor accommodation will be segregated from the parking for other land-uses and will be remote from the accommodation. Small buggies will be used to transport visitors and baggage to their holiday accommodation as to reduce unnecessary vehicular trips.
- 2.6.15 No new internal access roads are proposed to be provided and it is intended that the proposed development will be fully accessible by sustainable modes of transport.

Pedestrian and Cycle Path Networks

- 2.6.16 The existing pedestrian and cycle network as it exists through the West Riverside site will be retained and enhanced as necessary to provide full connectivity to the wider network as well as new internal elements of the site. Further to this, bike hire is proposed as part of the enhanced Tourist Information Office within Station Square, which will further support internal movements by bike. It is also intended that the existing cycle and walking routes will be widened (where possible) to Sustrans standards (3m) for shared walking and cycling.
- 2.6.17 Throughout the Station Square, Riverfront and Drumkinnon areas, the existing path network including the John Muir Way walking and cycling route will be retained and enhanced as appropriate. The existing north-south foot and cycle paths through the Riverfront Zone, will be enhanced with a series of east-west paths increasing access opportunities between Pier Road and the Riverfront area.
- 2.6.18 The existing foot and cycle way from Loch Lomond Shores to Old Luss Road will be extended to provide a shared foot and cycle way, compliant with technical standards, on the north side of the road, providing a direct walking and cycling link between the two proposed development sites.
- 2.6.19 For Woodbank House site, paths and cycleways are intended to be developed in accordance with Designing Streets Principles and will provide a continuous internal path network, and a direct link with Upper Stoney-mollan Road/ John Muir Way.

Rail

- 2.6.20 The proposed development includes a monorail facility between Zone A (Station Square) and Zone C (Pierhead). This will improve connectivity between Balloch Village and Loch Lomond Shores, through a direct and convenient means of transport.
- 2.6.21 Recent enhancements by Sustrans on Balloch Road between the Station Square development (Zone A) and Balloch Railway Station, will help deliver enhanced access between the station and the proposed development site as well as the wider village of Balloch. Allowance has been made within the parking provision to maintain 44 park and ride spaces currently located adjacent to the visitor centre. These will be relocated as part of the development.

Bus

- 2.6.22 The existing bus service that operates through Loch Lomond Shores via Ben Lomond Way is presently intended to remain in operation with the proposed development, albeit discussions will be held with the operator once layout designs are progressed further.

Car Parking

- 2.6.23 Proposed parking arrangements have been outlined below. The development will seek to accord to the adopted parking standards at the time of AMSC applications. Parking provision for the site is summarised below in **Table 2-4**.

Table 2-4: Parking Provision

Development Zone	Land Use	Parking Provision
Station Square, Pier road and Riverside	Brewery incl. pub	136 spaces
	Restaurant	
	Budget outdoor hotel	
	WDC park and Ride (44 spaces)	
	Woodland Lodges (Riverfront)	
	Apartment Hotel & Restaurant	
Woodbank	Water Park	103 spaces
	Staff Parking	27
	Woodland Lodges	81 spaces
	Woodbank House	25 spaces
Total		372 spaces

- 2.6.24 For the purposes of the PPI application, it has been assumed that the development proposals demonstrate self-sufficiency with respect to vehicle parking and there is no reliance on existing parking at the Loch Lomond Shores car parks (main or overspill).
- 2.6.25 The parameters plan indicates total parking provision of 372 new parking spaces. As the detail of the proposals progress, it is anticipated that parking locations will be re-configured to allow effective, efficient, and sustainable vehicle and access operations across the shared sites. This will be form part of any detailed design applications.
- 2.6.26 Once constructed, the proposed development will operate as a tourism and leisure business centred around a range of on-site visitor accommodation facilities. As shown on **Figure 2-1 – Parameters Plan**, proposed food and drink, retail, leisure and entertainment uses will be clustered within Zone A – Station Square and Zone C – Pierhead, with visitor accommodation located across all zones.
- 2.6.27 All proposed accommodation will be used for short term visitor/holiday purposes only. This visitor accommodation will therefore not give rise to any additional pressure on social or community infrastructure including healthcare and education infrastructure.

2.7 Materials and Natural Resource Usage

- 2.7.1 The proposed development will utilise land and construction materials including bricks, roofing tiles, cement, concrete, timber, asphalt, piping, etc). Soil (reused from onsite resources wherever practicable) and seeded grass or turf will also be used for landscaping purposes. Once occupied the proposed development will use domestic energy and utilities infrastructure. Soil movement will be undertaken with reference to best practice guidelines available in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009).
- 2.7.2 Where possible, excavated material will (depending on type) be used to backfill excavations and for site re-profiling purposes where appropriate. It is not expected that any material will be

unsuitable for re-use in this way, though in the unlikely event that such material arises it will be disposed off-site in line with relevant waste disposal regulations.

2.8 Expected Residues, Emissions and Waste

- 2.8.1 Construction waste is expected to be restricted to normal non-hazardous materials such as off-cuts of timber, bricks, wire, fibreglass, cleaning cloths, paper, materials packaging and similar materials. These will be sorted and recycled or appropriately disposed of by the appointed contractor.
- 2.8.2 Once operational, a commercial waste management and recycling contractor will service the proposed development. The proposed development will be designed to accommodate heavy goods vehicles (HGV) in areas where access is required for waste collection and deliveries. The quantity and type(s) of waste during operation cannot be predicted at this stage, as this will depend on operational factors, visitor numbers and waste management legislation.

2.9 Proposed Construction Works, Programme and Management Arrangements

Construction Works and Programme

- 2.9.1 At this stage it is anticipated that construction will take approximately six years and the key construction activities are likely to include:
- Vegetation clearance, earthworks and soil preparation to prepare areas of the site for construction activities;
 - Construction of infrastructure including internal access routes, drainage pipes and SUDS attenuation basin(s);
 - Formation of public open space, with associated landscaping;
 - Targeted tree removal and installation of forest lodges and path networks;
 - Construction of building foundations (where required), structure, cladding and glazing and internal walls and partitions;
 - Installation of fixtures, fitting and building services;
 - Utility diversions, upgrades and connections as required; and,
 - External landscaping, highway and drainage works.
- 2.9.2 A Construction Environmental Management Plan (CEMP) will be implemented to reduce the risk of any likely significant adverse effects on environmental receptors as a result of construction activities. To help minimise disturbance to the local residents and businesses adherence to the CEMP will be overseen by an appointed Ecological Clerk of Works (ECoW).

2.10 Proposed Mitigation and Enhancement

Embedded Mitigation

- 2.10.1 In line with EIA best practice, an overarching suite of mitigation measures and commitments is proposed to be incorporated from the outset to both address any adverse effects and enhance its environmental performance. These are termed embedded mitigation measures. They are as follows:

Construction Phase

- CEMP:
 - Development and implementation of measures relating to: construction traffic routing, site access/deliveries, parking, contractor management, parking, fuels and materials storage, standard dust and noise suppression techniques and standard pollution presentation and control techniques. These measures will be set out within a Construction Environmental Management Plan (CEMP). Any other measures to be included in the CEMP will be identified as 'further mitigation' (not embedded) through the EIA;
 - Prior to commencement any construction activities within a 5m corridor of waterfronts will be subject to specific consideration within the CEMP and agreed with the LLTNPA;
 - An Environmental Clerk of Works (ECoW) will be appointed to ensure that the CEMP and associated mitigation measures are implemented effectively;
 - A pollution prevention and response plan will be set out in the CEMP. This will provide site spill response procedures, emergency contact details and equipment inventories and their location. All staff will be made aware of this document during site induction. A copy will be available in the site office at all times;
 - Adoption of standard construction industry working hours for noise generating activities;
 - A contaminated hotspots plan and procedure for managing unexpected contamination will be produced;
 - Settlement tanks/beds should be utilised to prevent increased suspended solids entering Loch Lomond or River Leven via surface water run-off during rainfall;
 - A 3m exclusion zone will be adopted either side of INEOS gas pipelines in the site;
 - Risk Assessments and Method Statements (RAMS) will be prepared. Construction/ground workers should take cognisance of any contamination reported and will be required to work in accordance with the RAMS. Appropriate personal protective equipment (PPE) to be worn by all site workers (as specified in RAMS);
 - Informing site workers of any contamination on the site and the potential health effects from exposure through site induction and toolbox talks;
 - Dust suppression to minimise the air quality effects on offsite users;
 - If piled foundations are required, a site-specific risk assessment designed specifically to assess the risks posed by piling should be carried out. If piled foundations are required, the technique used will be selected on the basis of protecting groundwater from contamination. Safe piling techniques should be adopted to minimise risks posed; and,
 - All construction work will be undertaken in general accordance with [SEPA's Guidance for Pollution Prevention \(GPPs\)](#).
- Landscape:
 - 12m buffer (i.e., no construction) around the site boundary with residential area of Drumkinnon Gate;

- Prior to commencement, any construction activities within 5m corridor of waterfronts will be agreed with the LLTNPA;
 - Location of construction compounds and temporary stockpiles in the least visibly prominent locations within the site;
 - Use of well-maintained hoardings and fencing;
 - Protection of all retained vegetation on the site in accordance with BS 5837: Trees in relation to design, demolition and construction;
 - Prevention of damage to landscape features adjacent to the construction plots due to movement of construction vehicles, plant or operatives;
 - Working with existing topography to minimise ground level regrading where possible;
 - Access to all key nodes and routes (formal and informal) through the site are to be maintained during the construction phase. Localised diversions to facilitate construction may occur on land within the applicant's control. Any impacts on walking/ cycle routes during the construction phase will be short term and localised diversions will be put in place;
 - Continued provision of access through parts of the site to existing receptors and land uses as identified in **Chapter 2** Site and Proposed Development and **Chapter 12** Traffic and Transport;
 - Design of lighting to avoid unnecessary intrusion onto adjacent buildings and siting construction compounds and machinery to minimise upward and outward light spill;
 - Use of designated construction traffic routes to and from the site in order to minimise visual amenity effects on neighbouring sensitive receptor areas; and,
 - Ecological Clerk of Works (ECoW) to work on site with the construction contractor to oversee the management of the risks associated with protecting biodiversity and manage ecological operatives engaged in ecological mitigation activities.
- Ecology, trees and woodland:
 - Safeguarding of identified important trees, including their root systems, from disturbance or loss;
 - Erection of forest lodges on elevated support structures where required to minimise the need for the development of building foundations within woodland areas;
 - Siting and design of forest lodges to be informed by detailed tree surveys of the site, to be undertaken in accordance with relevant British Standards. This siting and design process should:
 - Maintain the integrity of the existing forest habitat network;
 - Target existing open areas where possible by using the completed survey to locate existing glades;
 - Ensure the retention of desirable, native species trees is achieved by maximising the use of glades for lodge positions and by targeting specific survey of trees which surround the chosen areas (to be identified through aforementioned surveys);

- Use baseline habitat and future targeted tree survey to mitigate any predicted tree loss and disturbance impacts; and,
 - Target opportunities to remove invasive species through construction activities.
 - Commitment to the provision of appropriate compensatory planting to offset the loss of trees in building footprint and working areas within existing woodland (the details of which are considered below and treated as further mitigation and enhancement);
 - Manage extents of invasive species such as rosebay willowherb, Japanese knotweed and bamboo in particular at Woodbank House;
 - Development of path and minor route networks using low impact technology to protect tree roots, soils and surrounding vegetation;
 - Manage existing woodland to improve its age profile, encourage continued biodiversity and preserve its presence in the landscape;
 - Boost ecology and ground flora within woodland by thinning out trees, allowing more sunlight to reach the woodland floor. Management of non-native species;
 - A speed limit of 10mph will be applied to all construction traffic to reduce the risk and frequency of potential collisions, and,
 - Boundary features and fences will be designed to allow roe deer and badgers to move freely where appropriate.
- Heritage:
 - Undertake an agreed programme of archaeological works, as requested by WoSAS, prior to the construction of the proposed development;
 - Adherence to relevant HES regulatory and good practice guidance in construction methods;
 - Retention of Woodbank House listed building façade as a landmark feature, within a reconstructed building and self-catering apartment development; and,
 - Conversion of other listed buildings within the Woodbank House area to self-catering and ancillary uses where practicable and viable.
 - Socio-economics, Tourism and Recreation:
 - Access to all key nodes and routes through the site to be maintained during the construction phase. Localised diversions to facilitate construction may occur on land within the applicant's control. Any impacts on walking/cycle routes during the construction phase will be short term and localised diversions will be put in place;
 - Production of an Access Management Plan (AMP), for agreement with LLTNPA in order to manage access through the construction and operational phases;
 - Continued provision of access through the site to existing receptors and land uses; and,
 - Access to tourist information facility maintained whilst refurbishment takes place.

- Pipeline:
 - 3m stand-off zone either side of INEOS pipelines, unless agreed with INEOS;
 - Minimisation of any piling (if required) within 25m of INEOS pipelines, with construction techniques to be agreed through consultation with INEOS if required; and,
 - On-site supervision by INEOS of construction work within 25m of INEOS pipelines.
- Ground Conditions:
 - Additional intrusive site investigation to delineate any contamination and a remediation strategy;
 - Further intrusive site investigation will be undertaken prior to construction within and around the derelict buildings at Woodbank House to determine the potential for contaminants of concern including asbestos and PAHs. If elevated concentration is identified, remediation will be undertaken to remove the contaminated material or lower the concentration of contaminants to a suitable level (i.e. below GAC);
 - Remediation strategy which may include localised excavation of contaminated material and replacement with clean fill/capping material or hardstanding;
 - Gas protection measures (if required) will be incorporated into the design of the proposed development to protect the building structures and human health (future end users); and,
 - Risk Assessments and Method Statements (RAMS) will be prepared. Construction/ground workers should take cognisance of the contamination reported and will be required to work in accordance with the RAMS.
- Hydrology:
 - No buildings within the functional floodplain and finished floor levels of buildings adjacent to the water bodies to be above the 1 in 200yr + climate change peak flood level;
 - Avoid crossings of existing watercourse to prevent pollution;
 - A 5m corridor along waterfronts will be subject to specific consideration with a CEMP; and,
 - Surface water drainage scheme for the proposed development will be designed in accordance with Sustainable Urban Drainage systems (SUDs) principles. The maximum discharge rate will be equivalent to the greenfield (i.e. pre-development) runoff rates.
- Noise:
 - Stretch of 2m high close boarded timber garden fencing at the garden /terrace boundary of NSR 19.

Operational Phase

- Landscape:
 - 12m buffer around the site boundary with residential area of Drumkinnon Gate;
 - Screening increased around the boundary between woodland and residential area using evergreen native shrubs, to reduce visual effects on nearby residents;
 - Unsightly utilities to be screened and incorporated within the woodland setting;
 - Proposed car parking to be sensitively incorporated into the woodland. Surface materials to be in keeping with the location and context. Additional mitigation measures such as buffer planting to provide natural screening to new car parking;
 - Existing pathways, to be regraded and enhanced with new porous surfacing materials;
 - New woodland planting to be created on the Woodbank House site;
 - Retention of Woodbank House listed building facade as a landmark feature;
 - Continued public access to Drumkinnon Bay waterfront;
 - Continued provision of access through the site to existing receptors and land uses as identified in **Chapter 2: Site and Proposed Development**;
 - Safeguarding of identified important trees within existing woodland areas, as identified in the **Parameters Plan in Appendix 2.1**;
 - Integration of Station Square proposals with Balloch Street Design Project and Sweeney Cruises proposal;
 - Elevated sections of monorail to have sufficient clearance above roads and paths to allow for passage underneath; and,
 - Access to all key nodes and routes will be maintained during operation with the quality of some routes enhanced. Some permanent localised diversions may be required; however, this will be limited to using other land within the applicant's control in order to avoid lengthy or circuitous alterations.

- Ecology:
 - During the design process, various factors were taken into consideration in order to minimise potential impacts on IEFs. These can be summarised as:
 - Exclusion of all previously proposed works from Drumkinnon Wood;
 - Ongoing management and survey of invasive species such as Rosebay Willow herb, Japanese Knotweed and Bamboo in particular on the Woodbank site; and,
 - Commitment to implement a woodland management plan to enhance the quality and composition of existing woodland within the site, particularly of the ancient woodland and those presenting semi-natural characteristics. The details of this plan will be informed by the EIA and relevant design considerations.

- An Ecological Clerk of Works (ECoW) will oversee all stages of construction, to ensure that good practice measures with regards to ecology are implemented. Other good construction practice measures will be incorporated in the Construction Environmental Management Plan (CEMP) for the Proposed Development. These are summarised as:
 - Work areas will be carefully marked out and delimited on the ground, with the assistance of the ECoW, to ensure no extraneous habitat loss. Temporary fencing will be used to ensure that plant and operatives do not encroach further than is necessary into ecologically sensitive areas;
 - General good practice measures for working in and near to watercourses and waterbodies will be adhered to, for example, during construction, silt interception traps will be provided to minimise unchecked contaminated run-off. Appropriate temporary drainage solutions must be designed and installed. Detailed drainage designs will require review and approval by the scheme Environmental Manager (and ECoW as required), and appropriate drainage measures will be installed in advance of major ground-breaking works. A pollution prevention plan will be included in the CEMP;
 - Fuels and chemicals will be stored securely in the site construction compound;
 - Appropriate wash-out facilities will be available for vehicles and machinery;
 - Trenches and excavations will be covered at the end of working day, or will include ramps, and stored pipes will be capped, to prevent animal entrapment;
 - If construction work is carried out during hours of darkness, machinery and lights will be directed away from watercourses and woodland edges. Use of heavy machinery and pile drivers limited to avoid two hours before and after dawn and dusk within 30 m of watercourses, waterbodies or woodland edges; and,
 - A site speed limit of 10 mph for all construction traffic will be in place to protect badger, red squirrel and otter.
- Heritage:
 - Reconstruction and conversion of Woodbank House listed building as a landmark feature for self-catering accommodation.
- Socio-economics, Tourism and Recreation:
 - Employment of local resident workers and delivery of training (e.g. apprenticeships) where possible;
 - Access to all key nodes and routes will be maintained during operation with the quality of some routes enhanced. Some permanent localised diversions may be required within the applicants control in order to avoid lengthy or circuitous alterations;
 - Continued public access to Drumkinnon Bay waterfront and public beach areas at Balloch Pierhead;
 - Development and implementation of Travel Plan (to encourage sustainable travel by visitors and workers); and,

- Continued provision of access through the site to existing receptors and land uses;
- Pipeline:
 - No ground development within 3m stand-off zone each side of INEOS pipelines, unless agreed with INEOS.
- Hydrology:
 - The proposed surface water and SUDs scheme will require regular maintenance during its operational life. This maintenance will include the regular debris clearing and cutting of grass of surface SUDs features, and the inspection and repairs to underground features if necessary. The responsibility for the maintenance of the drainage network will lie with the organisation that adopts the network.
- Traffic & Transport:
 - Proposed development will be fully accessible by sustainable modes of transport. The existing pedestrian and cycle network through West Riverside will be retained and enhanced as necessary to provide full connectivity to the wider network and new internal elements of the site. The site will benefit from increased uptake of sustainable modes with walking and cycling the go-to-mode of choice for users of the woodland lodges and overnight accommodation: by leaving cars remote from the lodges will reduce any unnecessary internal car trips;
 - Bike hire is proposed as part of enhanced Tourist Information Office at Station Square, which will further support internal movements by bike;
 - Whilst the internal layout requires to be developed further as part of subsequent detailed design stages, it is intended that (where possible) the existing cycle and walking routes will be improved/widened to Sustrans standards for shared walking and cycling routes;
 - Throughout the Station Square, Riverfront and Drumkinnon areas, the existing path network including the John Muir Way will be retained and enhanced as appropriate. Discussions will be held with Sustrans when the detail of these routes is considered. The existing north-south foot and cycle paths through the Riverfront Zone, will be enhanced with a series of east-west paths increasing access opportunities between Pier Road and the Riverfront area;
 - The existing foot and cycle way from Loch Lomond Shores to Old Luss Road will be extended to provide a shared foot and cycle way, compliant with technical standards, on the north (development) side of the road, providing a direct walking and cycling link between the two sites;
 - From the Woodbank House site is intended to be configured in accordance with Designing Streets Principles and will provide a continuous internal path network, a direct foot and cycle link will be provided to the Upper Stoney-mollan Road/ John Muir Way; and,
 - A signage and wayfinding strategy will be developed for the wider site once clarification on the preferred parking locations for site-based activities and land uses are confirmed. It is expected that a combination of enhanced signage and Variable Message Signing (VMS) will need to be installed at key approaches to the site from both the strategic and local road network, as well as internally within the site, to ensure effective vehicular movement for internal destinations and appropriate directions to the relevant car parking areas.

2.10.2 The embedded mitigation measures of relevance to each technical assessment are listed in **Subsection 6 – Embedded Mitigation** and have been taken account of within the assessments presented in **Subsection 7 – Potential Effects of Chapters 5-14**.

Further Mitigation and Enhancement

2.10.3 Further specific mitigation has also been identified where necessary through the EIA process to prevent, avoid, minimise or offset significant adverse effects and to further enhance the environmental performance or wider benefits of the proposed development. This 'further mitigation and enhancement' is identified in **Subsection 8 – Further Mitigation and Enhancement of Chapters 5 – 14**.

2.10.4 Embedded mitigation described above, and further mitigation measures proposed is summarised in **Chapter 16 – Schedule of Mitigation and Monitoring**. This will enable LLTNP to secure this mitigation in any PPIP granted for the proposed development.

2.11 Consideration of Alternatives

2.11.1 Paragraph 2 of Schedule 4 of the 2017 EIA Regulations requires an EIAR to provide a description of the reasonable alternatives, which are relevant to the development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment.

2.11.2 The nature of certain developments and their location may make the consideration of alternative sites a material consideration. In such cases, the EIAR must record the consideration of alternative sites. More generally, consideration of alternatives (including alternative sites, choice of process, and construction phasing) is widely regarded as good practice and resulting in a more robust application for planning permission. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered must be outlined in the EIAR.

2.11.3 For the purposes of this EIAR, and noting that the site is positively allocated within the LDP for Visitor Experience developments, the only alternatives considered in relation to the proposed development were:

- Different possible formulations of proposed land use zones across the site. The proposed configuration of land use zones has been arrived at following detailed analysis of multiple on-site constraints, including the need to safeguard INEOS pipeline infrastructure and to minimise disturbance to woodland including the adjacent Drumkinnon Woodland. The proposed configuration of land use zones is considered to be optimal in terms of safeguarding environmental and infrastructure constraints whilst enabling the development of a commercially viable tourism, leisure and recreation development.

3 EIA Process

3.1 Introduction

- 3.1.1 This Chapter describes the approach to this EIA Report, the responses received during the scoping process, and consultations that have been undertaken with key stakeholders and members of the public.

3.2 Overview of EIA

- 3.2.1 EIA is a systematic procedure that must be followed when determining applications seeking consent for certain categories of project. It aims to identify a project's likely environmental effects, required mitigation measures to reduce the level of or avoid those effects, and assess the residual significance of predicted environmental effects taking account of all proposed mitigation and enhancement measures. This process helps to ensure that predicted effects, and the scope for reducing them, are properly understood by the public and the relevant determining authority (Loch Lomond & The Trossachs National Park Authority) before determination of the proposal.
- 3.2.2 Within Scotland, the requirements of the European Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by the European Council Directive 97/11/EEC, are transposed in law by The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations).
- 3.2.3 An important tenet of EIA is that it is a process culminating in the submission and examination of an EIAR, rather than just a single output in the form of a report. EIA therefore has a number of key characteristics; it is:
- **Systematic**, comprising a sequence of tasks defined both by regulation and best practice;
 - **Analytical**, requiring the application of specialist knowledge and skills from environmental sciences and policy;
 - **Impartial**, its objectives being to inform decision making and improve the environmental performance of projects rather than being to promote them;
 - **Consultative**, with provision being made for obtaining information and feedback from interested stakeholders and relevant consultees; and,
 - **Iterative**, allowing opportunities for environmental concerns to be addressed during the planning and design of a project.
- 3.2.4 Typically, an iterative design process occurs in response to environmental constraints (identified during the EIA process) and other design objectives, taking account of project viability considerations and feedback from relevant consultees. This often results in a development proposal incorporating mitigation measures or design features to avoid, reduce or compensate for potential adverse effects, referred to as embedded mitigation. Additional mitigation is then identified where necessary to reduce or avoid residual significant environmental effects.

3.3 Statutory Provisions

- 3.3.1 The PPiP application submitted for the proposed development stands to be determined under the provisions of the Town and Country Planning (Scotland) Act 1997 as amended. Statutory EIA requirements for certain planning applications are set out within the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended.

3.4 EIA Screening and Scoping

- 3.4.1 The site of 18.2ha exceeds the thresholds identified for EIA screening under Classes 10 or 12 of Schedule 2 of the 2017 EIA Regulations. Furthermore, the site is located within the boundaries of Loch Lomond and the Trossachs National Park (LLTNP) and under the EIA Regulations, it is classified as a ‘Sensitive Area’:

“sensitive area” means: —

(g) an area designated as a National Park by a designation order made by the Scottish Ministers under section 6(1) of the National Parks (Scotland) Act 2000(f).

- 3.4.2 In recognition of the environmental sensitivities affecting the site and surrounding area, the Applicant considered from the outset that a formal EIAR would be required to support any PPIP application submitted for the proposed development. To confirm this and to obtain clarity on the required scope of the EIAR, a formal EIA Screening and Scoping Request was submitted in June 2021 to LLTNPA in their role as the relevant determining Planning Authority.
- 3.4.3 LLTNPA confirmed that a formal EIA would be required on account of likely significant effects from the proposed development. After consulting relevant stakeholders an EIA Scoping Opinion was issued by LLTNPA in July 2021 to define the required scope of this EIAR. The Scoping Opinion is provided in full within **Appendix 3.1**.

3.5 Information Requirements and Guidance

Information Requirements

- 3.5.1 Schedule 4 of the EIA Regulations prescribes the information which must be included within an EIAR. The information requirements specified in Part 2 of Schedule 4 must be addressed in all EIARs, whilst the requirements specified in Part 1 must also be addressed to the extent “reasonably required to assess the environmental effects of the development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile”.
- 3.5.2 Schedule 4 of the EIA Regulations therefore require this EIAR to include descriptions of:
- Relevant environmental baseline characteristics. Each of the technical assessments presented in **Chapters 5 – 14** include Baseline sections to meet this requirement;
 - Physical characteristics of the whole development, which in this case means identifying the key characteristics of the construction and operational phases of the proposed development (**Chapter 2 – Site and Proposed Development**);
 - Consideration of the reasonable alternatives studied by the developer (**Chapter 2 – Site and Proposed Development**);
 - The main characteristics of the production or operational phase, including natural resource usage (**Chapter 2 – Site and Proposed Development**);
 - An estimate of expected residues and emissions (**Chapter 2 – Site and Proposed Development**);
 - The assessment methodologies deployed in undertaking this EIA (technical assessment methodologies provided in **Subsection 3** within **Chapters 5 – 14**;
 - Likely significant effects from the proposed development (assessments presented in **Subsection 7 – Potential Effects, Subsection 9 – Residual Effects and Subsection 10 – Cumulative Assessment** within the technical assessments presented in **Chapters 5 – 14**;
 - Mitigation measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment (**Section 3.8 – Proposed Mitigation and**

Enhancement, Subsection 6 – Embedded Mitigation and Subsection 8 – Further Mitigation and Enhancement within the technical assessments presented in **Chapters 5 – 14**, and **Chapter 16 – Schedule of Mitigation and Monitoring**;

- Any proposed monitoring arrangements in relation to any predicted significant adverse effects (**Chapter 16 – Schedule of Mitigation and Monitoring**);
- A non-technical summary (**NTS**) of all of the above elements (**Volume 3**); and,
- A reference list detailing the sources used in the assessments (refer to the reference lists provided at the end of each technical assessment presented in **Chapters 5 – 14**).

EIA Guidance

3.5.3 A range of reference material and guidance has been drawn upon in developing the EIA methodology adopted for the proposed development. Over and above the EIA Regulations, this guidance includes:

- IEMA. (2015) IEMA Environmental Impact Assessment Guide to Shaping Quality Development;
- IEMA. (2016) IEMA Environmental Impact Assessment Guide to Delivering Quality Development;
- IEMA. (2004) IEMA Guidelines for Environmental Impact Assessment; and,
- Morris, P and Therivel, R. (2009) Methods of Environmental Impact Assessment

3.5.4 Topic specific guidance used in the preparation of the individual technical assessments presented in this EIAR is noted where relevant in **Subsection 2 of Chapters 5 – 14**.

3.6 The EIA Process

3.6.1 The EIA Regulations emphasise that EIA is a process rather than output and involves the following stages:

- **Assessment work** culminating in the preparation of an EIAR in accordance with requirements prescribed by the EIA Regulations;
- **Public consultation on the application for planning permission, the EIAR and any other** relevant information. Consultation may be iterative rather than only occurring once in the EIA process;
- **Examination** by the relevant determining authority of the information presented in the EIAR and other relevant information including that received through the consultation; and,
- The relevant determining authority coming to a **reasoned conclusion** on the residual significant effects of the proposed development on the environment, prior to the determination of any related consenting application.

3.6.2 The EIA process therefore encompasses all stages of considering environmental issues associated with projects, from initial identification of relevant issues through to assessing the residual significance of **predicted** environmental effects and securing required mitigation. This ensures that all required mitigation is carried out in the implementation of projects. EIA therefore directly influences the design, construction, operation and, where relevant, decommissioning, of proposed projects, as well as providing information to decision makers.

3.7 EIA Methodology

Overview

3.7.1 Following confirmation of the required scope of the EIA in accordance with **Appendix 3.1 – EIA Scoping Opinion**, each environmental topic has been subject to investigation and assessment to identify and evaluate likely significant environmental effects. The survey and assessment methodologies deployed were based on recognised best practice and guidance relevant to each topic area, details of which are provided within relevant technical assessment EIAR (**Chapters 5 – 14**). In general terms, the technical assessments undertaken for each topic area and EIAR chapter include:

- Collation of existing baseline information regarding relevant aspects of the environment, together with surveys and fieldwork, as required, to fill any knowledge gaps or update historical information;
- Use of the collated baseline to identify relevant trends, describe the baseline scenario and predict the evolution of this baseline scenario in the absence of the proposed development;
- Consultation with relevant consultees in relation to the EIA scope and emerging findings;
- Consideration of the potential effects of the proposed development on the baseline scenario (and its predicted evolution), followed by the identification of design changes, mitigation measures to avoid or reduce predicted significant adverse effects, and possible enhancement measures to improve environmental outcomes;
- Assessment of the significance of predicted residual effects from the proposed development and consideration of any monitoring required in relation to predicted residual significant adverse effects;
- Production of EIAR chapter; and,
- Input into a consolidated schedule of required mitigation measures and proposed monitoring arrangements for the proposed development.

3.7.2 The detailed methodology adopted to undertake each individual technical assessment is presented in **Subsection 3 – Methodology** within **Chapters 5 – 14**.

Key Methodological Assumptions

3.7.3 The following key assumptions have been used to ensure that this EIAR is a proportionate assessment of the level and significance of likely effects from the proposed development:

- The EIA including the preparation of this EIAR has been undertaken in full accordance with current EIA Regulations;
- The proposed development will be built out in accordance with **Appendix 2.1 – Parameters Plan**. All other drawings submitted as part of this EIAR or the PPIp application are for illustrative purposes only, as the detailed siting and design of the proposed development required to be confirmed after PPIp is granted;
- Construction will be completed by 2030, with visitor accommodation and attractions scheduled to open in that year;
- Baseline conditions are generally considered to be current conditions at the site and surrounding area, unless materially affected by the approved developments noted in **Table 2-2**. The potential for cumulative effects as a result of the construction and operation of the approved developments has been considered;
- In accordance with the EIA Regulations, an assessment of likely effects (including cumulative effects) from the proposed development has been carried out in order to

identify, describe and assess any significant effects. As such, the assessment only considers possible effects which have some potential to be significant within the context of the EIA Regulations. Other possible effects which have no potential to be significant in EIA terms have necessarily been scoped out of this EIA;

- The assessment of likely significant cumulative effects has assumed that the cumulative developments identified in **Section 2.4** will be built out as set out in the planning applications, planning permissions and associated documents available in the public domain for these developments; and,
- Suitable planning conditions and planning obligations will be attached to any planning permission granted for the proposed development to secure relevant mitigation measures proposed in this EIAR (**Chapter 16 – Schedule of Mitigation and Monitoring**).

Consultation

3.7.4 In addition to the EIA Scoping Opinion from LLTNP, consultation has been undertaken by the applicant to agree scope and assessment methods, proposed mitigation measures and design parameters. Consultation has been undertaken with the following stakeholders:

- Scottish Environment Protection Agency (SEPA);
- NatureScot;
- Historic Environment Scotland (HES);
- Transport Scotland;
- Scottish Water;
- Forestry and Land Scotland (FLS);
- Visit Scotland;
- Scotrail;
- West of Scotland Archaeological Services (WoSAS);
- LLTNP Planning;
- LLTNP Landscape Officer;
- LLTNP Access Officer;
- West Dunbartonshire Council – Roads;
- West Dunbartonshire Council – Environmental Health; and,
- West Dunbartonshire Council – Flooding.

3.7.5 A programme of consultation and engagement with the community has also been undertaken. This is detailed within the accompanying **Pre-Application Consultation Report (PAC)** submitted in support of the PPIp application.

Establishing Baseline Conditions

3.7.6 A range of site surveys and data collection exercises have been undertaken to identify environmental conditions at the proposed site and surrounding area. The surveys are reported in each topic (**Chapters 5-14**). Data has also been collated regarding relevant approved cumulative developments that need to be considered in this EIA (see **Section 2.4**).

- 3.7.7 The EIAR has been based on technical surveys and assessments, the reporting of which is frequently too detailed for incorporation into **Volume 1** of this EIAR (e.g. ecology surveys). In such instances the technical survey and assessment reports are provided in full as an Appendix to this EIAR (**Volume 2**), with a relevant summary and reference to the full survey or assessment provided in Volume 1. The geographical scope of these appended surveys and assessments has been based on the likelihood for significant effects in accordance with the agreed EIA scope.

Types of Effect

- 3.7.8 Schedule 4 to the EIA Regulations requires consideration of a variety of types of effect, namely direct / indirect, secondary, cumulative, positive / negative, short / medium / long-term, and permanent / temporary. All identified effects need to be considered in terms of how they are predicted to arise, whether they are positive (beneficial) or negative (adverse), their temporal occurrence (i.e. when they are predicted to occur) and their duration once the effect does occur. This includes consideration of effects during both the construction and operational phases of the proposed development.
- 3.7.9 The EIAR must also consider the potential for effects identified through one topic specific technical assessment to generate secondary or related effects of relevance to other EIAR topics. At the outset, this EIA recognised that predicted traffic movements (proposed development, existing and approved cumulative developments) will need to be taken account of in the Noise and Air Quality technical assessments as well as the Traffic and Transport EIAR Chapter. Traffic data calculated to inform the **Transport Assessment** (TA) submitted separately in support of the PPIP application has also been used to inform the traffic and transport, noise and air quality chapters of this EIAR.
- 3.7.10 The spatial scope for the identification of likely significant environmental effects varies between environmental topic areas and a relevant Study Area is therefore defined within each technical assessment (**Chapters 5-14**). In general terms, this spatial scope depends on the location of relevant receptors and the existence of known pathways for effects from the proposed development to the identified receptors. Where considered necessary, a Study Area map is included within the Appendix to each relevant technical assessment chapter.

Uncertainty

- 3.7.11 The prediction of future effects inevitably involves a degree of uncertainty. Where necessary, the technical assessments presented in **Chapters 5 - 14** describe the principal factors giving rise to uncertainty in the prediction of effects and the degree of the uncertainty.
- 3.7.12 Confidence in the assessments in this EIAR can be derived from the application of robust topic specific assessment methodologies, which have been developed and implemented in accordance with relevant technical guidance and standards (e.g. Design Manual for Roads and Bridges (DMRB), Guidelines for Ecological Impact Assessment in the UK and British Standard Institute). Where the success of a mitigation measure is uncertain, the extent of the uncertainty has been identified in the EIAR and a suitable response identified.

Mitigation and Enhancement Measures

- 3.7.13 The technical assessments presented in **Chapters 5 – 14** of this EIAR firstly identify predicted effects from the proposed development taking into account embedded mitigation measures, before identifying any further mitigation reported and then reporting predicted residual effects.
- 3.7.14 The EIA Regulations requires the EIAR to include a description of “*measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.*” **Subsection 8** within each technical assessment presented in **Chapters 5 - 14** therefore consider the need for additional mitigation measures (beyond embedded mitigation) to avoid significant adverse effects which are predicted to occur. Consideration is also given to potential measures to reduce predicted ‘not significant’ adverse effects and to enhance predicted beneficial effects from the proposed development where appropriate.
- 3.7.15 A schedule of all proposed mitigation measures is provided in **Chapter 16 – Schedule of Mitigation and Monitoring**. This schedule will assist LLTNPA in securing the required mitigation measures, proposed monitoring and conditions required within any PPIP approval.

The Significance of Likely Residual Effects

- 3.7.16 Residual effects are the environmental effects that will remain after the incorporation of both embedded and additional mitigation measures. It is these residual effects which should be considered when assessing the significance of the proposed development, rather than the unmitigated effects as unmitigated effects will not occur. For example, whilst the proposed development may affect protected species or habitats, appropriate mitigation has been identified to ensure that significant effects on such do not occur.
- 3.7.17 To provide an objective assessment of residual effects, their significance has been determined and identified in the EIAR, as detailed below. This allows for comparison of effects between topics, strengthens the assessment of impact interactions and allows decision makers to examine and provide a reasoned conclusion on the significant environmental effects.
- 3.7.18 The two principal criteria for determining significance of an environmental effect are the magnitude of change and the sensitivity of an identified receptor to this change. The likelihood of the change occurring is also considered, as a constituent factor affecting the predicted magnitude of change.
- 3.7.19 The approach to assigning significance to predicted environmental effects is not detailed within the EIA Regulations, meaning that it is necessary to develop effect significance thresholds to underpin the assessments reported in this EIAR. These thresholds are defined on a topic specific basis within **Chapters 5–14**, taking account of relevant regulations, guidance, standards, the advice and views of consultees, and professional judgement. **Subsection 3 – Methodology** within each chapter explains the topic specific methodology adopted to identify the level and associated significance of predicted effects with reference to relevant thresholds. Where relevant, this is based on the factors identified above and the generic criteria set out in **Table 3-1** below.

Table 3-1: Generic Significance Criteria

	Level of Effect	Criteria
Significant	Substantial	These effects are assigned this level of significance as they represent key factors in the decision-making process. These effects are generally, but not exclusively, associated with sites and features of national or regional importance. A change at a district scale site or feature may also enter this category.
	Major	These effects are likely to be important considerations at a local or district scale and may become key factors in the decision-making process.
	Moderate	These effects, while important at a local scale, are not anticipated to be key decision-making issues.
Not Significant	Minor	These effects may be raised as local issues but are unlikely to be of importance in the decision-making process.
	Negligible or No Effect	Either no effect or effect which is beneath the level of perception, within normal bounds of variation or within the margin of forecasting error. Such effects should not be considered by the decision-maker.

- 3.7.20 Effects that are described as “substantial,” “major” or “moderate” are determined to be significant, whereas effects that are described as “minor” or “negligible” are determined to be not significant.

3.8 Impact Interactions

- 3.8.1 **Chapter 15 – Impact Interactions** provides the assessment of impact interactions, i.e. receptors being affected by more than one environmental effect and therefore potentially being subject to a more significant combined effect than reported within the individual technical EIAR (**Chapter 5–14**). Details of the approach to identifying and assessing impact interactions is also provided within **Chapter 15**.

3.9 Approach to Cumulative Impact Assessment

- 3.9.1 The EIA Regulations require likely significant cumulative effects from a development proposal in combination with existing and approved development to be described within an EIAR.

- 3.9.2 Existing developments are considered as part of the baseline scenario within the technical assessments provided in this EIAR, whilst approved and proposed developments are considered separately within the cumulative impact assessment section of each technical assessment chapter. Approved and proposed developments of relevance to this EIAR are listed on **Table 2-2**.

4 Legislative and Planning Policy Context

4.1 Introduction

- 4.1.1 This chapter sets out the key planning legislation, policies and other material considerations applicable to the proposed development which have informed the siting, design and environmental assessment processes. Consideration is given to the following matters in turn:
- Relevant Statutory Provisions;
 - Relevant national policies, advice and guidance;
 - Statutory Development Plan applicable to the site; and,
 - Other material considerations, including the National Park Plan, local planning guidance.
- 4.1.2 The purpose of this chapter is to identify all legislative and policy requirements and considerations relevant to the technical assessments provided in **Chapters 5 – 14** of this EIAR. Appropriate cross-references are provided within **Subsection 2** of each technical assessment chapter to confirm the legislation and policies applicable to the assessment.
- 4.1.3 This chapter is factual in nature and does not assess the proposed development's accordance with relevant planning policies. A separate Planning Statement assesses in detail how the proposal accords with relevant Development Plan policies and other material considerations.

4.2 Relevant Statutory Provisions

- 4.2.1 The key planning legislation of relevance to this EIAR and the overall EIA process is:
- The Town and Country Planning (Scotland) Act 1997 as amended ('the Principal Act');
 - The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as amended;
 - The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended ('the EIA Regulations');
 - The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 as amended;
 - The National Parks (Scotland) Act 2000 as amended; and,
 - The Climate Change (Scotland) Act 2009.
- 4.2.2 Under Section 25 of the Principal Act, the determination of all planning applications must be made in accordance with the statutory Development Plan applicable to the site of a proposed development, unless material considerations indicate otherwise. Section 264A of the Principal Act also requires special attention to be paid to the applicable National Park Plan. Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 as amended requires Planning Authorities to have "*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*".
- 4.2.3 Section 1 of the National Parks (Scotland) Act 2000 as amended identifies the four aims of Scotland's National Parks including Loch Lomond and the Trossachs National Park (LLTNP):
- "(a) to conserve and enhance the natural and cultural heritage of the area;*
 - (b) to promote sustainable use of the natural resources of the area;*
 - (c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and,*
 - (d) to promote sustainable economic and social development of the area's communities."*
- 4.2.4 The aims of the National Park Act are material planning considerations. Section 9 of the same Act states that the aims should be achieved collectively. However, if in relation to any matter it appears to the National Park Authority that there is a conflict between the first aim, and the other

National Park aims, greater weight must be given to the conservation and enhancement of the natural and cultural heritage of the area.

- 4.2.5 Section 44 of the Climate Change (Scotland) Act 2009 requires all Scottish public bodies to “*act in the way best calculated to*” contribute to the delivery of Scotland’s greenhouse gas (GHG) emissions reduction targets and climate change adaptation programmes, as well as “*in a way that it considers most sustainable*”. These public body duties are relevant insofar as the Planning Authority (LLTNP) is a Scottish Public Authority.
- 4.2.6 The relevance and implications of the EIA Regulations for this EIAR are detailed separately in **Chapter 3 – EIA Process**.
- 4.2.7 It should be noted that the technical assessments presented in **Chapters 5–14** have also been prepared in accordance with a wide range of topic specific legislation, non-planning policies, technical guidance and standards, as detailed within Subsection 2 of each chapter.

4.3 National Planning Policies

- 4.3.1 National planning policy is contained within both the National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP), both of which were published in June 2014. Draft NPF4 is scheduled to be adopted on 13 February 2023 and is a material consideration.

National Planning Framework 3

- 4.3.2 The NPF3 provides a statutory framework around which to orientate Scotland’s long-term spatial development. The Framework highlights the spatial planning implications of multiple national policy documents and commitments. In overall terms NPF3 emphasises the Scottish Government’s commitment to increasing sustainable economic growth across all areas of Scotland and orientates the efforts of Scotland’s planning system towards this purpose.
- 4.3.3 The introduction to the NPF3 notes the importance of maintaining economically active and vibrant rural areas whilst “*safeguarding our natural and cultural assets and making innovative and sustainable use of our resources*”. Related to this, the document identifies tourism as a key economic growth sector and includes a strategy for Scotland’s two National Parks. This notes that the National Parks are “*sustainable, successful places*” where the Scottish Government wishes to see “*planning and innovation continue to strengthen communities, encourage investment, support tourism, deliver affordable rural housing, and encourage high quality place making and visitor experiences.*” At the same time NPF3 expects Development Plans to safeguard their “*exceptional environmental quality*”.
- 4.3.4 The national spatial strategy of the NPF3 is structured around four key themes, namely: a successful, sustainable place; a low carbon place; a natural, resilient place; and a connected place. These themes are presented as ‘planning outcomes’ within the SPP (2014).
- 4.3.5 With respect to the Glasgow and Clyde Valley City Region (which includes West Dunbartonshire and therefore in local authority terms, Balloch), NPF3 focuses on efforts to regenerate post-industrial areas and provides support for proposals which increase employment and economic development. It also identifies the Central Scotland Green Network (CSGN) as a National Development, encourages the remediation of derelict land, promotes active and sustainable travel and supports the protection and enhancement of green infrastructure.

National Planning Framework 4 (NPF4)

- 4.3.6 On the 8th of November 2021, Scottish Ministers published the revised version of Draft NPF4. NPF4 will, for the first time, incorporate Scottish Planning Policy and will take on enhanced status as part of the statutory development plan. NPF4 will have a longer time-horizon, fuller regional coverage and improved alignment with wider programmes and strategies. It is due to be adopted by Scottish Ministers on the 13th of February 2023 and thereby a material consideration for the assessment of the proposal. The conformity of the proposed development with NPF4 is assessed in detail in **Table 4-1** below.

Table 4-1: Relevant Policies contained within NPF4

NPF4 Policy Title	Summary	Conformity
Policy 1 (Tackling the climate and nature crisis)	This policy states that development proposals should be considered against the global climate and nature crises, considering the just transition, conserving assets and rural revitalization.	<p>Whilst the proposal is not at the detailed design stage, the applicant is committed to ensuring that the proposals will meet the required standards for sustainable design, materials and infrastructure including energy and heating requirements to ensure the construction and operation of the proposed development will meet the Scottish Government's net zero targets and commitment to tackling the biodiversity / nature crisis.</p> <p>A Sustainability Statement is included with the planning application.</p>
Policy 2 (Climate mitigation and adaptation)	This policy seeks to minimise emissions associated with development and ensure that places are more resilient to the impacts of climate change.	
Policy 3 (Biodiversity)	<p>This policy seeks to enhance biodiversity by strengthening nature networks and implementing nature-based solutions.</p> <p>Policy 3(a) requires that development proposals contribute to the enhancement of biodiversity and restore degraded habitats.</p>	<p>Chapter 6 of the EIAR provides an assessment of the likely significant effects on trees and woodland within and in close proximity to the site.</p> <p>Only trees and planting of local provenance will be delivered on site – adding to the biodiversity value of the area. As part of the detailed design, a landscape and planting strategy will be developed to present detailed enhancement measures to be undertaken.</p> <p>Chapter 5 of the EIAR and Appendix 5.1 of EIAR Volume 2 provides a habitat assessment of the likely significant effects on species and habitats within and in close proximity to the proposed development.</p> <p>As the current planning application is seeking permission in principle, further ecology surveys will likely be required at the detailed design stage (depending on timing). The specified mitigation measures for badgers, otters, red squirrel, bats and nesting birds will be required to be implemented in advance of any construction.</p> <p>Moreover, a shadow Habitats Regulations Assessment (HRA) has also been produced, which following the implementation of appropriate mitigation measures, concludes there will be no significant effects on any Natura 2000 sites.</p>
Policy 6 (Forestry, woodland and trees)	This policy seeks to ensure that development proposals enhance and improve woodland and tree cover. It highlights that where any woodland is removed, compensatory planting will most likely be expected to be delivered.	<p>Chapter 6 of the EIAR provides an assessment of the likely significant effects on trees and woodland within and in close proximity to the site.</p> <p>Tree felling is only proposed at the pierhead area of the proposal, to make room for the pierhead element of the</p>

NPF4 Policy Title	Summary	Conformity
		<p>proposed development. This is set to occur on an area of low value immature woodland. Otherwise, there is no significant felling proposed at West Riverside or Woodbank House.</p> <p>Additional planting including compensatory planting, in lieu of the pierhead, is proposed by the applicant at West Riverside and Woodbank and it is expected that this will be secured via planning conditions having regard to the outline planting plans contained in the Design and Access Statement and as shown on the Indicative Masterplan. Non-native and invasive species north of Woodbank House will be removed and replaced by only native species.</p>
<p>Policy 7 (Historic assets and places)</p>	<p>This policy seeks to protect and enhance the historic environment and bring redundant or neglected historic buildings back into sustainable and productive uses.</p> <p>Policy 7 (m) highlights that development proposals will be supported where they sensitively repair, enhance, and bring historic buildings, as identified as being at risk locally or on the national Buildings at Risk Register, back into beneficial use.</p>	<p>Within the Site, the Category A listed building Woodbank House with Garden Building and stables have been assessed for potential direct and setting effects.</p> <p>There will be no demolition of any of the listed buildings and attendant structures within the Woodbank House Area. It is proposed to reuse the A Listed former hotel and associated and bring them back into a viable use as self-catering holiday accommodation and thereby prevent further deterioration of the fabric of these buildings. The buildings are on the LLTNPA's Vacant and Derelict Land Register and the Buildings at Risk register.</p> <p>The proposals will directly support this policy and a detailed Listed Building Consent (LBC) application will be required in due course for assessment by LLTNPA in consultation with Historic Environment Scotland (HES) before any works can take place.</p>
<p>Policy 9 (Brownfield, vacant and derelict land and empty buildings)</p>	<p>This policy seeks to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, ensuring that development is directed to the right locations (maximising the use of existing assets and minimising additional land take).</p> <p>Moreover, it seeks to ensure that derelict buildings and spaces are regenerated to improve wellbeing and transform places.</p>	<p>There will be no demolition of any of the listed buildings and attendant structures within the Woodbank House Area. It is proposed to reuse the A Listed former hotel and associated and bring them back into a viable use as self-catering holiday accommodation and thereby prevent further deterioration of the fabric of these buildings. The buildings are on the LLTNPA's Vacant and Derelict Land Register and the Buildings at Risk register.</p> <p>The proposals will directly support this policy which seeks to secure the conversion and reuse of redundant buildings and a detailed Listed Building Consent (LBC) application will be required in due course for assessment by LLTNPA in consultation with Historic Environment Scotland (HES) before any works can take place.</p>

NPF4 Policy Title	Summary	Conformity
		<p>The land at West Riverside (encompassing the pierhead, amenity areas, car parking and Lomond Shores) and Woodbank House (comprising the remains of the house, outbuildings and gardens including estate walls) is a sustainable location for the proposed development and comprises a mix of brownfield and vacant land in proximity to the current facilities at Lomond Shores.</p>
<p>Policy 12 (Zero waste)</p>	<p>This policy seeks to encourage, promote, and facilitate development that is consistent with the waste hierarchy.</p>	<p>This application is for planning permission in principle. Details of waste management will be dealt with in subsequent detailed applications. A contractor will be appointed prior to operation and the required levels of bin provisions and recycling facilities will be agreed prior to any detailed application.</p>
<p>Policy 13 (Sustainable transport)</p>	<p>This policy seeks to encourage, promote, and facilitate development that prioritises walking, wheeling, cycling and public transport for travel and reduce the need to travel unsustainably.</p> <p>Policy 13(c) highlights that where development proposals are likely to generate an increase in the number of person trips, a transport assessment will be required to be undertaken.</p> <p>Policy 13(e) states that proposals which are “ambitious in terms of low car parking will be supported”. Policy 13 (f) notes that proposals for travel generating uses will be required to monitor travel patterns resulting from the development and be accompanied by a Travel Plan.</p>	<p>The proposed developments proximity to Balloch town centre and associated public transport services (such as the train and bus); the John Muir Way core path and the National Cycle Route will also reduce reliance on non-sustainable models of transport. This accessibility is one of the factors that make the location one of the few within the National Park capable of supporting and accommodating a tourism-led development of this nature.</p> <p>The proposed development will enhance the existing paths within the area, in terms of width and surfacing in some areas. It also seeks to connect with the John Muir Way core path at various points.</p> <p>Visitors to the proposed development will be encouraged to use sustainable modes of transport. For example, cars will be permitted to park at the West Riverside holiday lodges and a shuttle bus service will be provided. The Outline Travel Plan measures are set out in the enclosed Transport Assessment which provides further information in this regard.</p> <p>A Transport Assessment has been prepared to accompany the planning application. Given the inherently sustainable location of the proposed development, a key operational aspect will be to promote and encourage sustainable transport behaviour and reduce reliance on private vehicles as a means to access the area.</p>
<p>Policy 14 (Design, quality and place)</p>	<p>This policy seeks to encourage, promote, and facilitate well designed development that makes successful places by taking a design-led approach.</p> <p>It highlights that proposals should be designed to improve the quality of an area and be consistent with the six qualities of successful places: healthy, pleasant, connected, distinctive, sustainable, and adaptable.</p>	<p>Whilst the proposal is not at the detailed design stage, the applicant is committed to ensuring that the proposals will meet the required standards for sustainable design, materials and infrastructure including energy and heating requirements.</p> <p>The land at West Riverside (encompassing the pierhead, amenity areas, car parking and Lomond Shores) and</p>

NPF4 Policy Title	Summary	Conformity
		<p>Woodbank House (comprising the remains of the house, outbuildings and gardens including estate walls) is a sustainable location for the proposed development and comprises a mix of brownfield and vacant land in proximity to the current facilities at Lomond Shores.</p> <p>The proposals are also well connected to Balloch town centre and its services including train and bus. The proposed development also seeks to enhance connections with the John Muir Way core path and the National Cycle Route and reduce the reliance on non-sustainable modes of transport.</p> <p>Moreover, the high-quality design and layout of the proposal, and over time the compensatory tree planting, will further integrate the proposed development into the semi-rural landscape and reduce its visual influence on the landscape.</p>
Policy 20 (Blue and green infrastructure)	This policy seeks to both protect and enhance blue and green infrastructure, ensuring that they form an integral part of design and that communities can benefit from accessible, high-quality blue, green and civic spaces.	<p>The proposals seek to improve access to blue and green infrastructure assets across / adjacent to the site, including areas of open space, woodland, the River Leven, and Loch Lomond.</p> <p>Whilst the proposal is not at the detailed design stage, the applicant is committed to ensuring that the proposals will deliver appropriate blue-green infrastructure on site.</p>
Policy 22 (Flood risk and water management)	This policy seeks to strengthen resilience to flood risk. Policy 22(c) notes that development proposals must not increase the risk of surface water flooding and manage all rain and surface water through sustainable drainage systems.	<p>Chapter 10 of the EIAR provides an assessment of the likely significant effects on the water environment including surface water and drainage.</p> <p>A Drainage Strategy has been proposed to avoid and minimise likely significant effects from surface water and wastewater. Other mitigation measures include:</p> <ul style="list-style-type: none"> ▪ Adherence to relevant national guidance, legislation and good practice in construction methods; ▪ Adherence to a Construction Environmental Management Plan (CEMP) including a Pollution Prevention Plan (PPP) and monitoring of activities on the Site to ensure compliance; ▪ The use of construction phase Sustainable Drainage Systems (SUDs); ▪ An Environmental Clerk of Works (ECOW) will supervise the construction works to ensure compliance with the CEMP and PPP; ▪ Permanent surface water drainage network incorporating SUDs to ensure efficient levels of treatment and attenuation of surface water discharges from site; and

NPF4 Policy Title	Summary	Conformity
		<ul style="list-style-type: none"> ▪ Routing of construction discharges through at least three levels of SUDs to ensure that water quality of high sensitivity receptors is not adversely affected. <p>Moreover, a Flood Risk Assessment (FRA) has been submitted with the PPIp application that assesses the likely significant effects on the water environment.</p> <p>In terms of flood risk, the proposed development zones are located outwith the floodplain as identified in the FRA. The minimum finished floor levels of any buildings will be above the maximum flood level estimated for the 1 in 200 year plus climate change event.</p>
Policy 23 (Health and safety)	This policy seeks to protect people and places from environmental harm, mitigate risks arising from safety hazards, and encourage development that improves health and wellbeing. In doing so, proposals will be supported that improve health and address health inequalities.	<p>The proposed development is inherently supportive of improving health and wellbeing – providing an enhanced space for leisure and recreation, as well as improving key public routes and access.</p> <p>Whilst the proposal is not at the detailed design stage, the applicant is fully committed to ensuring that the proposals will meet the required health and safety standards, both in terms of human safety and environmental health.</p>
Policy 29 (Rural development)	<p>This policy seeks to encourage rural economic activity, whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.</p> <p>Policy 29(a) highlights that development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported.</p> <p>Policy 29(b) notes that development proposals in rural areas should be suitably scaled, sited, and designed to be in keeping with the character of the area.</p>	<p>The land at West Riverside and Woodbank House is a sustainable location for the proposed development and comprises a mix of brownfield and vacant land in proximity to the current facilities at Lomond Shores. The proposals also ensure the safeguarding and enhancement of the natural environment and seek to bring redundant heritage assets back into productive use.</p> <p>The proposals are well connected to Balloch town centre and its services including train and bus. The proposed development also seeks to enhance connections with the John Muir Way core path and the National Cycle Route and reduce the reliance on non-sustainable modes of transport.</p> <p>Moreover, the high-quality design and layout of the proposal, and over time the compensatory tree planting, will further integrate the proposed development into the semi-rural landscape and reduce its visual influence on the landscape.</p> <p>Above all, the proposals seek to stimulate the economy of the National Park by encouraging sustainable tourism and providing employment opportunities for those living in nearby villages and towns.</p>

NPF4 Policy Title	Summary	Conformity
<p>Policy 30 (Tourism)</p>	<p>This policy seeks to encourage, promote, and facilitate sustainable tourism development which benefits local people, is consistent net zero and nature commitments, and inspires people to visit Scotland.</p> <p>Policy 30(a) notes that development proposals for new and extended tourist facilities or accommodation, in locations identified in the LDP, will be supported.</p> <p>Policy 30(b) highlights that proposals for tourism development will take into account a variety of factors, including contribution to the local economy, compatibility with the surrounding area, impacts on communities, opportunities for sustainable travel and access to the natural environment.</p>	<p>It is an identified strategic tourism opportunity in Balloch as shown in the LDP Development Strategy Map.</p> <p>The proposed development is in a sustainable tourism location. Its proximity to the existing tourism and leisure offer at Lomond Shores will both enhance and complement the experiences provided at this location.</p> <p>Its proximity to Balloch town centre and associated public transport services (such as the train and bus); the John Muir Way core path and the National Cycle Route will also reduce reliance on non-sustainable models of transport.</p>

Scottish Planning Policy

- 4.3.7 SPP (2014) is a material consideration that carries significant weight. It sets out the Scottish Government's expectations regarding the treatment of specific planning issues within development planning and development management. The document aims to contribute to the achievement of the Scottish Government's overarching purpose of achieving sustainable economic growth.
- 4.3.8 SPP's Principal Policy on Sustainability (paragraphs 24-35) includes a presumption in favour of development that contributes to sustainable development, which relates to the identification of the need for and acceptability of the development. To implement this policy presumption, SPP (paragraph 29) identifies 13 sustainable development principles which should guide planning policies and decisions, of which 12 are relevant to the proposed development:
- *“giving due weight to net economic benefit;*
 - *responding to economic issues, challenges and opportunities, as outlined in local economic strategies;*
 - *supporting good design and the six qualities of successful places;*
 - *making efficient use of existing capacities of land, buildings and infrastructure including supporting town centre and regeneration priorities;*
 - *supporting delivery of accessible housing, business, retailing and leisure development;*
 - *supporting climate change mitigation and adaptation including taking account of flood risk;*
 - *improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;*
 - *having regard to the principles for sustainable land use set out in the Land Use Strategy;*
 - *protecting, enhancing and promoting access to cultural heritage, including the historic environment;*
 - *protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;*
 - *avoiding over-development, protecting the amenity of new and existing development; and,*
 - *considering the implications of development for water, air and soil quality.”*
- 4.3.9 SPP's other Principal Policy, on Place making (paragraphs 36-57), seeks to direct new development to the right location and to encourage a design-led approach to development in order to create high quality places. SPP (under paragraph 40) states that high quality development which demonstrates the following six qualities of successful places should be supported: *“Distinctive, Safe and Pleasant, Welcoming, Adaptable, Resource efficient, and Easy to move around and beyond”*. As noted in **Section 4.4** below, these six qualities are referenced in Overarching Policy 1 – Strategic Principles within the adopted LDP.
- 4.3.10 Subject specific provisions within the SPP of relevance to the proposed development are outlined in **Table 4-2** below.

Table 4-2: Relevant Subject Policies Within Scottish Planning Policy (2014)

Subject Policy	Relevance
Promoting Rural Development (Paragraphs 74 – 91)	This section identifies planning principles related to sustainable rural development including “...encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality...”. The section includes a sub-section regarding planning within Scotland’s National Parks (paragraphs 84 – 86), which lists the statutory aims of National Parks (see Section 5.2 above) and notes the need for LDP’s covering National Parks to be consistent with National Park Partnership Plans (see below).
Supporting Business and Employment (Paragraphs 92 – 108)	This section highlights the need to “give due weight to net economic benefit of Proposed Development” (paragraph 93). The SPP identifies tourism as one of several key growth sectors which should be appropriately supported through development plans.
Valuing the Historic Environment (Paragraphs 135 – 151)	This section states that planning should promote the care and protection of the designated and non-designated historic environment and should take account of all aspects of the historic environment. Detailed policy provisions are set out in order to protect and enhance different types of historical assets.
Listed Buildings (Paragraph 141)	This paragraph states that “where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest...”.
Gardens and Designed Landscapes (Paragraph 148)	This paragraph states that “planning authorities should protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance”.
Archaeology (Paragraph 150)	This paragraph states that “planning authorities should protect archaeological sites and monuments as an important, finite and non-renewable resource and preserve them in situ wherever possible”. In-situ preservation is encouraged, but in cases where this is not possible conditions or legal obligations should be used to ensure archaeological assets are recorded and analysed before development proceeds.
Valuing the Natural Environment (Paragraphs 193 - 233)	This section identifies a number of planning principles related to natural heritage protection and ecological resilience. Principles (paragraph 194) of relevance to the Proposed Development include that planning should: <ul style="list-style-type: none"> ■ “facilitate positive change while maintaining and enhancing distinctive landscape character; ■ conserve and enhance protected sites and species; ■ promote protection and improvement of the water environment...in a sustainable and co-ordinated way;

Subject Policy	Relevance
	<ul style="list-style-type: none"> ■ <i>protect and enhance ancient semi-natural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value; and,</i> ■ <i>seek benefits for biodiversity from new development where possible...</i>
Protecting Designated Sites (Paragraph 196)	This paragraph requires designated areas and sites to be identified and appropriately protected through development plans, without the use of buffer zones. It also states that <i>“the level of protection given to local designations should not be as high as that given to international or national designations”</i> .
Development Management Decisions (Paragraphs 202 - 203)	This section states that planning decisions <i>“should take account of potential effects on landscapes and the natural and water environment, including cumulative effects”</i> (paragraph 202). It further states that <i>“planning permission should be refused where the nature or scale of proposed development would have an unacceptable impact on the natural environment”</i> (paragraph 203). The same paragraph notes that whilst effects on statutorily protected sites will be an important consideration, this <i>“does not impose an automatic prohibition on development”</i> .
Non-Native Species (Paragraph 210)	This paragraph states that <i>“where non-native species are present on site, or where planting is planned as part of a development, developers should take into account the provisions of the Wildlife and Countryside Act 1981 relating to non-native species”</i> .
National Designations and Protected Species (Paragraphs 212 - 214)	Reflecting legislative requirements, these paragraphs identify criteria to safeguard nationally designated sites (including National Parks) and protected species from adverse effects. In relation to the protection of designated sites and protected species, these criteria have effectively been transposed into Natural Environment Policies 2-4 of the adopted Loch Lomond and the Trossachs LDP (2016).
Woodland (Paragraph 218)	This paragraph refers to and aligns directly with provisions set out in the Scottish Government’s Control of Woodland Removal Policy 2009 (see below).
Maximising the Benefits of Green Infrastructure (Paragraphs 219 - 233)	This section identifies a number of planning principles related to the protection, enhancement and promotion of green infrastructure including core paths and other important routes.
Managing Flood Risk & Drainage (Paragraphs 254-268)	This section promotes a precautionary approach to flood risk management. Where relevant, flood risk assessments and the deployment of Sustainable Urban Design (SUDs) are required (paragraph 255).
Promoting Sustainable Transport and Active Travel (Paragraphs 269-291)	This section includes a requirement for development proposals to consider traffic impacts including cumulative effects (paragraph 286).

National Planning Advice and Circulars

- 4.3.11 National planning policy is supported by numerous Scottish Government Planning Circulars, Planning Advice Notes (PANs), Advice Sheets, Ministerial/Chief Planner Letters to Planning Authorities, as well as guidance documents prepared by Key Agencies of the Scottish Government. Annexe A to Scottish Government Planning Circular 3/2013: Development Management Procedures confirms that amongst other considerations, the types of documents listed above are all potential material considerations in the determination of a planning application depending on the individual context of the case.
- 4.3.12 The following guidance and advice documents are considered to be of relevance to the proposed development and have been considered where appropriate in undertaking this EIAR:
- SEPA Flood Risk Standing Advice for Planning Authorities and Developers (November 2020);
 - PAN 33 Development of Contaminated Land (December 2017);
 - SEPA's Development Management Guidance: Flood Risk (July 2018);
 - Scottish Government Flood Risk Planning Advice (June 2015);
 - PAN 1/2013: Environmental Impact Assessment (August 2013);
 - PAN 2/2011 Planning and Archaeology (July 2011);
 - Planning Circular 3/2017: The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017;
 - PAN 1/2011 Planning and Noise (March 2011);
 - PAN 3/2010 Community Engagement (August 2010);
 - PAN 65 Planning and Open Space (June 2008);
 - PAN 60 Planning for Natural Heritage (2000, revised January 2008);
 - PAN 81 Community Engagement (March 2007);
 - PAN 51 Planning, Environmental Protection and Regulation (Revised October 2006);
 - PAN 79 Water and Drainage (September 2006);
 - PAN 75 Planning for Transport (August 2005);
 - PAN 68 Design Statements (August 2003); and,
 - PAN 61 Planning and Sustainable Urban Drainage Systems (July 2001);

Other National Policies, Advice and Guidance

Scotland's National Strategy for Economic Transformation 2022

- 4.3.13 The Strategy sets out the priorities for Scotland's economy as well as the actions needed to maximise the opportunities of the next decade to achieve our vision of a wellbeing economy. It sets out how, over the next ten years, how Scotland will aim to deliver economic growth that significantly outperforms the last decade, so that the Scottish economy is more prosperous, more productive and more internationally competitive. This will be done through focused interventions, working in collaboration with businesses and other partners, building on strengths in sectors like energy, financial services, creative industries and life-sciences and carving out new strengths in technology, space and decarbonisation. Five key transformational

programmes of action have been identified that can drive improvements in Scotland's economy: stimulating entrepreneurship; opening new markets; increasing productivity; developing the skills we need for the decade ahead; and ensuring fairer and more equal economic opportunities.

Tourism Development Framework for Scotland 2020 (Refresh 2016)

- 4.3.14 SPP (2014) requires Development Plans to be informed by the Tourism Development Framework for Scotland, which is also identified as a key document for planning decisions more widely. The Framework was first published in 2013 and refreshed in 2016 to align with a mid-term review of the national tourism strategy, Tourism Scotland 2020.
- 4.3.15 The Framework sets out actions to assist and promote growth in Scotland's visitor economy to 2020. It supports the implementation of Tourism Scotland 2020 and the achievement of its central target to secure annual visitor spend of between £5.5bn and £6.5bn to 2020 for overnight visitors. The Framework does this by providing guidance to development planning authorities to help secure growth in the visitor economy.
- 4.3.16 The Framework identifies the importance of the tourism economy within the LLTNP and states that "*further opportunities remain around the south of the Loch at the gateway to the National Park*" for hotel and other accommodation (paragraph 2.48). At paragraphs 2.54 – 2.58 the Framework defines 'resort development' as "*destinations where a collection of activities, such as eating, sleeping and recreation, can be undertaken in one defined location*" and confirms that such development can be situated in urban or rural locations, including within National Parks as existing key visitor destinations. The "*significant economic opportunities*" provided by resort development in terms of onsite rural employment, off-site supply chain benefits and the type of visitors they attract is noted within paragraph 2.55 of the Framework.

Historic Environment Policy for Scotland 2019

- 4.3.17 Historic Environment Policy (HEP) is a policy statement directing decision-making that affects the historic environment. It is relevant to a wide range of decision-making at national and local levels. It is supported by detailed policy and guidance. HEPS is a material consideration for planning proposals that might affect the historic environment, and in relation to listed building consent and scheduled monument consent.

Creating Places - A Policy Statement on Architecture and Place for Scotland (2013)

- 4.3.18 This document sets out the Scottish Government's overall policy statement on architecture and place. The document defines 'good design' as "*an innovative and creative process that delivers value*" and provides a detailed explanation of the six qualities of successful places which are now embedded within the SPP (2014).

Designing Streets – A Policy Statement for Scotland (2010)

- 4.3.19 Designing Streets is a policy statement for street design and marks a change in the emphasis of guidance on street design towards place-making and away from a system focused upon the dominance of motor vehicles.

Scottish Government Control of Woodland Removal Policy (2009)

- 4.3.20 This policy provides a national position to inform decisions on all woodland removal across Scotland. The policy includes a presumption in favour of protecting woodland, stating that removal should only be permitted where it would achieve significant and clearly defined additional public benefits. The concept of additionality is therefore central to the application of the Policy.
- 4.3.21 The Policy identifies situations where:
- There is a strong presumption against removal of woodland;
 - Woodland removal is acceptable without compensatory planting (CP); and,
 - Woodland removal is acceptable with CP.

- 4.3.22 The Policy requires consideration of any need for CP as part of a judgement regarding the acceptability of woodland removal, rather than as a separate issue or automatic presumption. Consequently, if significant net additional public benefit can be demonstrated from a development proposal involving woodland removal without compensatory planting, there is no policy requirement for compensatory planting to then be provided (whether on a like-for-like or other basis).
- 4.3.23 Annex C of the Policy specifies acceptability criteria for demonstrating significant net additional public benefit either in the absence of, or with, CP. The criteria regarding acceptability in the absence of CP include benefits derived from land use change (whether or not the intended direct result of a development proposal) as well as other environmental and public safety factors.
- 4.3.24 The policy is supported by implementation guidance (March 2015) for Forestry & Land Scotland staff. This document notes that the need for any compensatory planting should be minimised and that compensatory planting “*should be seen as the final option once all other solutions have been exhausted*”.

4.4 The Development Plan

Overview

- 4.4.1 The statutory Development Plan applicable to the site post-dates these and has undergone a formal examination by Scottish Ministers. Section 25 of the Principal Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.4.2 The current statutory Development Plan applicable to the site of the proposed development comprises the Loch Lomond and the Trossachs Local Development Plan 2017 – 2021 (‘the LDP’), which was adopted by LLTNPA in December 2016, and associated adopted Supplementary Guidance. The timescales for the next LDP have been revised and the current LDP will remain in place until 2024 to ensure the next LDP aligns with the new Planning Act.

Loch Lomond and the Trossachs Local Development Plan 2017 – 2021

- 4.4.3 The LDP is split into four distinct sections (and appendices), of which **Sections 2 – Vision, Section 3 – Place and Section 4** - Policies are of relevance.

Section 2 – Vision

- 4.4.4 The LDP’s vision is focused around conservation, visitor experience and rural development. Of relevance to the proposed development, it calls for “*a high quality, authentic experience for visitors, with many opportunities to appreciate and enjoy the natural and cultural heritage within an internationally renowned landscape that compares to the best on offer around the world*”. The LDP’s Development Strategy Map (page 17) identifies Balloch as one of eight locations for “*Strategic Tourism Opportunities*”, reflecting its role as a visitor destination and gateway to the National Park.

Section 3 – Place

- 4.4.5 This section sets out a spatial strategy for the LLTNP area, including land use allocations for each defined settlement. The following land use allocations in Balloch are of relevance:
- Balloch VE1: West Riverside – allocated for visitor experience related uses (as defined in approved Visitor Experience Planning Guidance – see **Section iv** below). This allocation covers the eastern part of the proposed site;
 - Balloch VE4: Woodbank House – allocated for visitor experience related uses. This allocation covers the proposed site, Woodbank House and attendant grounds; and,
 - Balloch MU1: The Old Station – allocated for mixed use (visitor experience and transport) uses. This allocation is located immediately south east of the proposed site.
- 4.4.6 No details are provided in Section 3 of the LDP regarding development requirements or design principles for these LDP site allocations.

Section 4 - Policies

- 4.4.7 This section of the LDP sets out three overarching policies which apply to all development proposals, followed by a suite of subject specific policies. The most relevance policy is Visitor Experience Policy 1, which at criterion (a) provides support for proposals forming a strategic tourism opportunity within Balloch. The other criterion within this policy relate to small-scale proposals and are not relevant to the proposed development.
- 4.4.8 Other policies within the adopted LDP of particular relevance to the proposed development are outlined in below. Particular attention is given to Overarching Policies 1 – Strategic Principles and 2 – Development Requirements as these set the framework within which all environmental and wider planning issues will be assessed through individual subject policies.

Table 4-3: Relevant Policies Within the Loch Lomond and the Trossachs LDP (2016)

LDP Policy Title	Summary
Overarching Policy 1 - Strategic Principles	<p>Sets out principles linking the LDP with the Scottish Planning Policy (SPP, 2014 – see Section 4.4 below). All proposals should demonstrate their accordance with relevant principles, including:</p> <p>Appendix A Collective achievement of the four statutory National Park aims (see Section 4.2 above) and implementation of the National Park Partnership Plan;</p> <p>Appendix B Contributing to sustainable development and climate change mitigation, including through sustainable design;</p> <p>Appendix C Prioritising the reuse of brownfield and vacant land;</p> <p>Appendix D Prioritising place making, including in street design;</p> <p>Appendix E Increasing connectivity, especially to public transport and key destinations, and providing safe access;</p> <p>Appendix F Open space provision that is “<i>high quality, appropriate to the needs of the local community, integrated to the development and provide links to the wider green network</i>”;</p> <p>Appendix G “<i>Minimising adverse impacts on water, air and soil quality</i>”;</p> <p>Appendix H “<i>Addressing climate change impacts</i>”;</p> <p>Appendix I “<i>Avoiding significant flood risk</i>”;</p> <p>Appendix J “<i>Relating well to the landscape context and setting</i>”, including in terms of cultural heritage and local built form”; and,</p> <p>Appendix K “<i>Incorporating appropriate soft and hard landscaping, a planting scheme, and measures to protect existing trees and other landscape features</i>”.</p>
Overarching Policy 2 - Development Requirements	<p>Provides high level design and environmental assessment criteria to assess all proposals, including the following of relevance to the PPiP application for the proposed development:</p> <p>11 “<i>Safeguard visual amenity and important views, protect and/or enhance rich landscape character, and features and areas specifically designated for their landscape values at any level;</i></p> <p>12 <i>avoid any significant adverse impacts of: flooding, noise/vibration, air emissions/ odour/fumes/dust, light pollution, loss of privacy/sunlight/daylight;</i></p> <p>13 <i>protect and/or enhance the character, appearance and setting of the historic environment;</i></p> <p>14 <i>protect and/or enhance the biodiversity, geodiversity, water environment, sites and species designated at any level...including ancient and semi-natural woodland, green infrastructure and habitat networks;</i></p> <p>15 <i>support Active Travel choices where possible...and transport infrastructure;</i></p> <p>16 <i>provide safe road access and appropriate parking provision;</i></p> <p>17 <i>promote understanding and enjoyment (including recreation) of the special qualities of the area by the public including safeguarding access rights;</i></p> <p>18 <i>achieve a high quality design and layout, provide a positive sense of place, and compliment local distinctiveness; and,</i></p> <p>19 <i>adaptable for the changing needs of future users, designing for extreme weather, fulfil disabled requirements, support new businesses, training/jobs for local people and a mix of uses/tenures...”.</i></p>
Overarching Policy 3 - Developer Contributions	<p>Sets out the circumstances in which development contributions will be sought in respect of proposals, including for infrastructure upgrades required to make the proposal acceptable in planning terms.</p>
Visitor Experience Policy 2 - Delivering a World Class Visitor Experience	<p>Requires tourism development proposals to enhance the visitor experience of the National Park.</p>
Transport Policy 2 - Promoting Sustainable Travel and Improved Active Travel Options	<p>Sets out criteria requiring proposals to contribute positively to “<i>encouraging safe, sustainable travel and improving active travel options</i>” throughout the National Park.</p>

LDP Policy Title	Summary
Transport Policy 3 - Impact Assessment and Design Standards of New Development	Requires large-scale proposals to be supported by a Transport Statement and Travel Plan, and to implement any identified appropriate mitigation, in order to minimise adverse traffic effects. The policy also sets out design related assessment criteria to ensure that proposals satisfy relevant technical standards and contribute to place making in the National Park.
Natural Environment Policy 1 - National Park Landscapes, seascape and Visual Impact	Requires proposals to protect the defined Special Qualities (SQ) of the LLTNP. In this regard proposals must <i>"be sympathetic to their setting and minimise visual impact"</i> .
Natural Environment Policy 2 - European Sites - Special Areas of Conservation (SAC) and Special Protection Areas (SPA)	In line with European legislative requirements, this policy sets out criteria to protect SPAs and SACs from significant adverse effects relating to the integrity and conservation objectives of each designated site.
Natural Environment Policy 3 - Sites of Special Scientific Interest, National Nature Reserves and RAMSAR Sites	Requires development affecting these nationally designated sites to either result in an overall <i>"enhancement"</i> to the designation, not have an adverse effect on its conservation objectives or integrity, or otherwise demonstrate that <i>"adverse effects on the qualities for which the area has been designated are clearly outweighed by social or economic benefits of national importance"</i> .
Natural Environment Policy 4 - Legally Protected Species	Affords protection to all legally protected species from adverse effects, unless criteria protecting the conservation status of the species, the absence of alternatives and the demonstration of <i>"public health, public safety or other imperative reasons of overriding public interest, including those of a social or economic nature"</i> are satisfied.
Natural Environment Policy 5 - Species and Habitats	Sets out criteria to protect habitats and species identified in the National Park Biodiversity Action Plan from unacceptable adverse impacts. Also requires consideration of effects on ecological functions and the continuity and integrity of species and habitats. Compensatory and management measures are required where adverse effects are predicted.
Natural Environment Policy 6 - Enhancing Biodiversity	Requires proposals to enhance biodiversity by protecting, managing and enhancing natural landscape, wildlife, wildlife habitat, habitat networks and green corridors. The policy also encourages the planting of native species.
Natural Environment Policy 8 - Development Impacts on Trees and Woodlands	Sets out criteria to protect against the loss or deterioration of loss of ancient or long-established plantation or semi-natural woodland. Development proposals resulting in the loss of woodland which contributes to local amenity, character and/or are of nature conservation value or historic significance will not be supported. The policy refers to the Scottish Government's Control of Woodland Removal Policy in relation to woodland removal and compensatory planting requirements.
Natural Environment Policy 9 - Woodlands on or Adjacent to Development Sites	Requires proposals which may affect trees or woodland to comply with British Standard 5837:2012.
Natural Environment Policy 11 - Protecting the Water Environment	Requires proposals not to have a significant adverse effect on the water environment.
Natural Environment Policy 12 - Surface Water and Wastewater Management	Requires proposals to connect to public sewers where available.
Natural Environment Policy 13 - Flood Risk	Requires compliance with the SPP (2014) Flood Risk Framework.
Natural Environment Policy 16 - Land Contamination	Requires proposals on or close to known or suspected contamination to be supported by an appropriate risk assessment.
Historic Environment Policy 1 - Listed Buildings	Criterion (b) restricts the demolition of listed buildings. Criterion (c) seeks to limit enabling development to the minimum level required and ensure it is sensitively designed.

LDP Policy Title	Summary
Historic Environment Policy 3 - Wider Built Environment and Cultural Heritage	Sets out criteria to protect buildings or feature of architectural and/or historical merit or of cultural significance.
Historic Environment Policy 4 - Gardens and Designed Landscapes (GDL)	Requires proposals not to adversely impact on GDL character, important views or wider landscape setting.
Historic Environment Policy 5 – Conversion and Re-Use of Redundant Buildings	Requires proposals for the conversion and reuse of “ <i>buildings of vernacular quality and local historic and/or architectural interest</i> ” to demonstrate the building is structurally sound and that conversion would not involve significant “ <i>rebuilding or new building elements</i> ”.
Historic Environment Policy 6 - Scheduled Monuments and Other Nationally Important Archaeological Sites	Sets out criteria to protect these national heritage assets and their setting.
Historic Environment Policy 7 – Other Archaeological Resources	Requires development proposals to retain, protect and preserve in-situ and in an appropriate setting any archaeological resources affected by the proposal.
Historic Environment Policy 8 – Sites with Unknown Archaeological Potential	Requires development proposals on sites considered to have significant archaeological potential to be supported by an archaeological evaluation of the site, with appropriate archaeological mitigation then implemented.
Open Space Policy 2 - Protecting Other Important Open Space	Sets out criteria to protect formal and informal open spaces in public or private ownership. Proposals need to demonstrate that any affected open space “ <i>is not of community value and has no other multifunctional purposes such as cultural, historical, biodiversity or local amenity value</i> ”. Where open space is affected, alternative provision and alignment with nature conservation management objectives is also required.
Waste Management Policy 1 - Waste Management Requirement for new Developments	Requires suitable waste management provision to be incorporated into proposals.

LDP Supplementary Guidance

- 4.4.9 A number of Supplementary Guidance (SG) documents were published following the adoption of the LLTNP LDP in 2016. The SGs are:
- Design & Placemaking 2018; and,
 - Developer Contributions 2018.
- 4.4.10 The SGs relevant to the proposed development is the Design and Placemaking SG and Developer Contributions SG. The Design & Placemaking SG provides siting and design guidance to ensure that all development proposals, including specifically “*holiday park developments*” are of high quality. In doing so the document identifies a range of detailed urban and environmental considerations for proposals in the National Park.
- 4.4.11 The Development Contributions SG identifies where developer contributions are likely to be sought by the LLTNP in respect of proposals, depending on their scale, location, predicted impact and particular circumstances.

LDP Planning Guidance

- 4.4.12 In addition to statutory SGs, the adopted LDP is also supported by a suite of non-statutory Planning Guidance (PG) documents. The following approved PG documents are relevant to the proposed development:
- Listed Buildings and Conservation Areas Planning Guidance - sets out assessment criteria for proposals in the grounds of listed buildings, including the protection of key views and landscape setting;
 - Visitor Experience Planning Guidance - defines different types of tourism accommodation and infrastructure. This PG does not set out criteria to assess tourism development proposals beyond repeating those within relevant LDP policies; and,
 - Sustainable and Active Travel Planning Guidance - guidance is about how development proposals can support the shift to active and sustainable travel. Travel plans aim to promote greener modes of transport and this guidance will help you create a travel plan. This guidance also gives developers and applicants further clarification on sustainable travel and improving active travel options for all development proposals.

4.5 Other Material Considerations

Overview

- 4.5.1 Other material considerations of relevance to the proposed development is the Loch Lomond & The Trossachs National Park Partnership Plan (2018 – 2023) and National Planning Framework 4 (NPF4)

National Park Partnership Plan

- 4.5.2 All planning decisions within the LLTNP area require to be guided by the policies of the National Park Partnership Plan where relevant to ensure that decisions are consistent with the National Park’s statutory aims (identified in **Section 4.2** above).
- 4.5.3 The National Park Partnership Plan 2018-2023 is an important material consideration in the determination of this PPI application. It is framed around three thematic vision statements, 13 outcomes and numerous related priorities for the LLTNP. All three identified themes, Conservation and Land Management, Visitor Experience and Rural Development, are relevant to the proposed development. Many of the identified outcomes are also relevant, specifically:
- Outcomes 1, 2 and 3 seek to conserve and enhance the National Park’s natural resources, special qualities and sense of place, whilst better mitigating and adapting to climate change;

- Outcomes 5 – 9 seek to enhance recreational opportunities of all kinds and enjoyment within the National Park, deliver a thriving visitor economy, and protect and enhance environmental quality, community life, health and wellbeing; and,
 - Outcomes 10 – 12 seek to enhance the National Park's towns and villages through investment, strengthen and diversify the rural economy, realise sustainable business growth, and retain a larger skilled young and working age population.
- 4.5.4 To monitor its implementation, the National Park Partnership Plan (2018-2023) lists 14 targets for the LLTNP area over the period to 2023, of which the following are relevant to the proposed development:
- Increase the value of the visitor economy from 2016 STEAM baseline of £340m;
 - Increase the proportion of people reporting a good quality experience of the National Park's settlements and landscapes;
 - Reduce the proportions of people arriving in or exploring within the National Park by car and increase the proportion exploring by foot, water and bike, all from 2015/16 Visitor Survey baseline levels; and,
 - Increase from 2016 baseline of 44% to 59% of water bodies achieving at least good ecological condition.

4.6 References

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