

Kilmaronock Community Council

Chair: Gavin MacLellan

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Director of Planning
Loch Lomond National Park
20 Carrochan Rd,
Balloch,
Alexandria G83 8EG

For attn of Caroline Strugnell

8 June 2020

Dear Madam

Application Number: 2020/0055/DET Address: Land Adjacent To Ross Priory Gartocharn West Dunbartonshire G83 8NL Proposal: Erection of training centre (use Class 8) comprising leadership centre and 4 no. visitor accommodation buildings with associated parking and landscaping Case Officer: Caroline Strugnell

Customer Details Name: Kilmaronock Community Council

Comment Details Commenter Type: Community representative

Kilmaronock Community Council objects to the Planning Application

Community Opinion

We report findings from our anonymous survey of opinion which was held after the virtual meeting with the Applicant on 25th May.

The findings are as follows:

Total Poll (online Poll)

61% Against the Application

26.7 % Supporting the Application

the only rural parish in West Dunbartonshire

Of which

81.3% were residents,

-others were landowners, close residents, or routine visitors with interests

Accuracy > 97% (all poll names were disclosed)

Background

KCC have consulted widely in the community and its fringes and we have considered responses in order to form our opinion. We have also held a confidential poll. Amongst others we have consulted with Professor Colin Adams the Chair of Freshwater Ecology, Scottish Centre for Ecology & the Natural Environment, Rowardennan, Loch Lomond.

We note the Applicant's Phase 1 Habitat Assessment which very correctly makes reference to some of the unique features of the landscape being considered – there are others. Some key points are as follows:

The project site is close and between the Portnellan - Ross Priory - Claddochside Site of Special Scientific Interest (SSSI), Loch Lomond Nation Nature Reserve (NNR), Loch Lomond Special Protection Area (SPA), Loch Lomond RAMSAR site and Endrick Water Special Area of Conservation (SAC).

- 487 species were reported with in 1km of the proposed development during the desk top survey including 152 fungi, 81 species of bird, five bryophytes, 12 ferns, five molluscs, 17 butterflies and moths, four beetles, one caddisfly, two mosses, 11 mammals and 181 flowering plants and trees;

- Notable species recorded within 1km of the proposed development included otter, red squirrel, pine martin, roosting bat, powan (freshwater fish), small pearl bordered fritillary and tufted loosestrife.

In Section 5 of this document some of the impacts are detailed and in Section 6 it refers to certain mitigations which would be required in the event of the project going ahead.

KCC's opinion is that the site is surrounded by SSSIs within the Loch Lomond National Park, which is an area of Scotland specially designated for its natural attributes and subject to Environmental protection under legislation. We consider "protection" is required by Policy and attempts for mitigation are not an option.

Findings - environmental

We note the response from SNH and their Agreement with National Parks for advisory work. This advisory work has not been provided at this important point of time for this Application which is regrettable.

We consider the case for Environmental Impact Assessment (Town and Country Planning (EIA) (Scotland) Regulations 2017 (SSI 2017 No. 102)) to be without doubt and this should have been conveyed to the Applicant and it should have been available to fully inform consultees and the Planning Committee at this juncture.

Despite this, we have sought expert opinion from Professor Adams and we detail this for your reference as follows:

- 1) There is a lack of an environmental impact assessment supporting the application. In such a sensitive area, surrounded by protected species, he considers this is an essential element to the effective scrutiny of this application. Elements of this that would be important (but there may be others) would be a) highly protected powan (fish) (they have statutory protection) are abundant in the area around Ross Priory and almost certainly spawning there b) the area is also an important route of passage for the 2 features of interest of the Endrick Water SAC – these being Atlantic salmon and lampreys - both migrate past Ross Priory c) the important post-glacial landforms resulting from the Lomond Readvance – a period in glacial history, the remnants of which are important around this area d) the impact of nutrient discharge from the proposed on-site sewage system,
- 2) The proposal to discharge treated sewage into Lomond in this area - there are several problems with this a) that there is no analysis of the broader impact of the increased nutrient load on Loch Lomond as a whole – we know that nutrient loading in the south of Lomond has been increasing (not dangerously so but certainly providing concern) in recent years and SEPA do not have standards - this, in combination with increased water temperatures and the likelihood of temperature rising still further, increases the probability for detrimental environmental change – for example increased plankton booms b) this effect is made more likely by the bathymetry of the area adjacent to Ross Priory – the loch basin is very shallow there and any mixing effect thus more limited c) that there is an alternative that would not result in any discharge into the Lomond – connection to the mains sewerage – this seems to be dismissed without analysis of the benefits d) this site is very close to a domestic water supply, it seems that there is a very significant risk there that has not been fully evaluated,

- 3) This may be relatively minor but the artificial pond planned for aesthetic reasons - if this was to be populated with non native plant fish or invertebrate species (as is common with decorative ponds) – this has the potential to result in invasion of an important site (Lomond) with invasive non-natives with the potential for devastating effects on Lomond plant and animal communities (this of course could be managed but it needs to be considered at least at planning stage).

SEPA reports do not provide KCC with confidence that the impact of surface water and effluent discharge of any quantity or standards can be predicted with any certainty. A dispersion model is an essential exercise and would be integral in an EIA.

Additionally, we recognize the expert comments particularly from the Angling interests (Vale of Leven District Angling Club, Loch Lomond Angling Improvement Association and Loch Lomond Fisheries Trust, and communication from Professors Lowe and Rose all of which are filed under the Application documents.

We also advise the Planning Authority that there is today a breeding Osprey nest overlooking the proposed site. We suggest protected species such as Osprey and Red Squirrels should be protected in a National Park.

Local Development Plan 2017 -21

KCC support the National Park Local Development Plan’s Protection Policies and consider the proximity to SSSI’s, the NNR and the Loch to be of high significance, so much that the same protection should apply.

We specifically reference:

Overarching Policy 1 Strategic Principles – **Aim 1 is to conserve and enhance the natural and cultural heritage – the large modern angular buildings with extensive glazing, visible from the Loch and surrounds do not meet this. In other areas the Plan endorses the use of traditional architecture and natural materials,**

Natural Environment Policy 3 Sites of Special Scientific Interest, The site sits between SSSIs and is close to National Nature Reserves and RAMSAR Sites, **and is not “imperative for the public interest” and there are “alternative solutions”. The creation of a large light emitting structure between SSSI’s will be disruptive to animal movements.**

Natural Environmental Policy 4 Legally Protected Species, **“Development will not be permitted where it would have an adverse impact on any protected species...such as Ospreys”**

Historic Environment Policy 3 & 4, **the project does not enhance the historic Ross Priory buildings or landscape/gardens,**

Natural Environmental Policy 6, Natural Environmental Policy 8 - **The development destroys natural landscape and does not enhance biodiversity,**

Natural Environmental Policy 11 **there is no evidence to demonstrate that there would not be an impact on riparian habitats.**

Precedent

Approving this project would demonstrate a Precedent which contradicts the entire Local Development Plan and would undermine the principle Aims and objectives of the National Park. KCC do not support this direction of development.

Findings – economic and social

We have considered the balance of need for the facility – environment versus social value – and whilst the service it provides is highly respected it could continue to be provided from existing providers at Ardoch – this has been verified by the new owners. The economic benefit to our community is the same from both locations and the service can continue to be provided for the common good.

The Proposal does not show any significant investment or improved cash generation in the existing Ross Priory Grade A Listed building or the Stable building and pigsty. Whilst we note there will be some use of Ross Priory for overspill accommodation, the Proposed buildings are not demonstrated to be directly complimentary to Ross Priory's business revenue. A sustainable solution would see evidence of support or even capex investment in heritage assets or consideration of an existing brown field site with existing transport infrastructure.

Planning procedures

We understand this Application will be considered by a Planning Committee.

We are available to support our views at a meeting of the above Committee upon your advice.

For Kilmarnock Community Council

A handwritten signature in black ink that reads "G MacLellan". The signature is written in a cursive style with a long horizontal stroke at the end.

G MacLellan

Chairman