



ANIMAL CONCERN

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Wednesday, 17 May 2006

Ms Sandra Auchterlonie,
Committee Clerk,
Planning and Development Control Committee,
Loch Lomond & the Trossachs National Park
National Park Headquarters
The Old Station
Balloch Road
Balloch G83 8BF

PLANNING APPLICATION REFERENCE: LT/2006/0009/DET/W

Dear Ms Auchterlonie,

I am in receipt of a letter from your Director of Planning concerning the meeting in Balloch next Monday, May 22nd, to discuss the above application. I regret that due to other commitments I will not be able to attend that meeting. However if possible I would be grateful if this letter could be brought to the attention of the Meeting.

Our original objection to the above application, made in January this year, concentrated on the physical aspects of installing the underground water reservoirs at Drumkinnon Tower and in particular our fears that this operation would risk disturbing the subsoil industrial pollutants known to be in the area.

Our objection did not cover the wider aspects of the development as we did not realise these could be considered during this application process. We had already raised them with the local authority at the Zoo License application stage of the Loch Lomond Aquarium project. I now see that Report No. NPAPC/05/2006/03, submitted by your Director of Planning to Monday's meeting, does in fact raise many of the concerns we raised with the local authority during the Zoo License application process.

When this project was first suggested our concern was for the welfare of the individual creatures contained in the aquarium. As the project was initially launched as an interpretation centre for local flora and fauna we had no worries about wider damage to the ecosystem.

It was when Merlin announced they intend bringing in non-native species of otter, tropical shark and Clown Fish that we became concerned that the proposed new aquatic zoo could seriously damage the Loch Lomond and River Leven catchment. Our concern increased when Mike Stephenson, Merlin's marine biologist, told local newspapers that the Powan was "A fresh water herring that is pretty unique to Loch Lomond. In fact Loch Lomond and Loch Long are the only places in the world where it can be found." Do these people really know what they are doing and can they be trusted to do it properly in such an environmentally sensitive area?

We note one of the tanks for which planning permission is sought will contain 15,000 litres of sea water. We assume this sea water will have to be replaced on a regular basis. We are concerned about the source of this water and how it will be screened for biological contaminants, some of which are invisible to the naked eye. It is already well documented that invasive aquatic plants, shellfish and marine parasites have been brought to this country in the ballast tanks of ocean going vessels. Are similar pollutants going to use Loch Lomond Aquarium as a gateway to Loch Lomond, the River Leven and the Clyde?

We note there is only one 12,000 litre tank to deal with waste water from both sea water and fresh water exhibits at the aquarium. Are there any assurances that this effluent will be properly treated to eliminate and/or contain any contaminants such as those mentioned above and any external and internal fish parasites? Can Merlin guarantee that any overflows in their system will be contained within the site?

We are also concerned about handling of waste sea water. Is any of this going to enter the sewerage system which is not designed to deal with large quantities of salt water? Has any investigation been carried out to determine whether any leakage of salt water could cause a chemical reaction with the industrial pollutants known to be in the silt in Drumkinnon Bay?

It is also a great worry to us that the applicants do not seem to have properly addressed these very serious issues and are more concerned with generating cheap publicity for their commercial venture. Stunts such as having staff driving around with shark fins sticking out of their cars and employing international weightlifters as part-time labourers continue to reinforce the image of Loch Lomond and The Trossachs as a theme park and not a National Park.

This case shows that there is a need for ratification of the procedures for applications of this type as it would make sense for the National Park Authority, which has Planning and Development Control powers, to also hold Zoo Licensing powers which are far more important to the long term protection of the Loch Lomond ecosystem. If bad building design caused the Drumkinnon Tower Visitor Centre to fall into Loch Lomond next week it would do no real damage to the ecosystem. If, in six months time, a five millimetre split in a filtration pipe caused contaminated water from Loch Lomond Aquarium to enter the Loch, the environment of the Loch could be irreparably damaged.

We again ask you to refuse consent for the above application.

Yours sincerely,



John F. Robins,
Campaigns Consultant