

Loch Lomond and The Trossachs National Park Authority submission of 6 February 2023

PE1967/D: Protect Loch Lomond's Atlantic oakwood shoreline by implementing the High Road option for the A82 upgrade between Tarbet and Inverarnan

Thank you for seeking the views of Loch Lomond & The Trossachs National Park Authority with respect to this petition.

National Park officers have had a series of discussions and interactions with Transport Scotland and their design team since they began working on this scheme in 2013. This included informal advice on the environmental design principles that should be adopted to deliver environmental and landscape objectives as well as the transport objectives for the scheme. An update on the design was provided to the National Park Authority Board. This is published on our website in the CEO Update paper for the Board meeting of 13 December 2021.

Throughout these discussions we have accepted the need to upgrade the road to a better standard and have pushed for a more strategic approach to the project rather than a series of piecemeal upgrades which had been the earlier approach. National Park officers have been providing specialist advice to the design team on a wide range of landscape, habitat, protected species and recreation issues. This has been in the form of technical advice and we provided detailed comments on the draft EIA in a letter of 3 May 2019 setting out our expectation for a design which complements and delivers multiple benefits befitting of a National Park delivering positive landscape outcomes and an overall biodiversity net gain.

The National Park Authority Board will only be able to take a considered and formal view on the whole scheme once a design has been finalised.

The road design as currently presented raises a number of significant environmental concerns. Given that it is understood that a consultation on formal road orders will be the next stage in the process, I wrote to Transport

Scotland on 20 May 2022 highlighting these concerns, particularly with reference to the twin climate and nature crises which I believe heightens their importance. In summary, the main points were:

- Ensuring that the environmental and landscape objectives for the scheme are given greater prominence.
- Ensuring that Access and active travel gains are delivered.
- The extent of land take, woodland habitat loss and rock cut.
- Ensuring effective mitigation and compensation for environmental impacts, particularly in relation to significant native woodland losses, loch shore impacts, rock cut visual impacts and road corridor landscaping.
- Ensuring suitable landscape and architectural considerations of new viaducts, stopping points and other infrastructure.
- Impacts on the viability of farming and other land management along the route corridor.
- The road standards in terms of width and speed being designed for.

If Transport Scotland progress with the design as currently presented to formally consult on road orders then the National Park Authority will have to formally consider its position on the proposal. I have highlighted that whilst it was recognised that preferred scheme is still being finalised, it was becoming clear that without significant change from what has been publicly shared, I was very unlikely to be able to recommend to the Board that the proposal is supported when the National Park Authority is formally consulted.

The alternative high-level route proposed by the petitioners is a concept that has not been developed or examined in any detail as far as I am aware. It largely falls in Route Corridor 3 considered by Transport Scotland in the DMRB Stage 1 Assessment. On a very outline examination of the route map put forward by the petitioners it can be reasonably observed that very significant engineering and environmental issues would need to be resolved:

- It contours along very steep hillsides at approximately the 70 m contour and would require significant cut and fill to create the new road, raising potentially significant challenges in relation to visual intrusion and traffic noise, etc.

- It would involve a much larger land-take than the TS proposal because none of it consists of existing road whereas the TS proposal is based on widening an existing road.
- It would go through of ancient woodland for much of its length and significant areas would be lost.
- It would go through the Garabal Hill geological SSSI for approximately 2 km.
- It would cross the West Highland Railway line twice.
- It would cross at least 6 significant water courses and three large side glens
- It would cross the Sloy power station pipes and intersect electricity transmission pylon lines at 4 locations.
- All of these crossings would require significant works. Large bridges or viaducts would appear to be needed to ensure that the road did not have tight bends or steep changes in gradient.

Clearly if this option were to be pursued then the implications and impacts would have to be considered further. Given the overview of design challenges set out above it is not at all obvious that this alternative would be environmentally more favourable than the route taken by the TS proposal.

In relation to process, our understanding is that Transport Scotland have been approaching this project using the same DMRB procedure as other road projects we have been involved in, including the A83 at Rest & Be Thankful.

I hope these observations are of assistance to the Committee.