

Petitioner submission of 14 May 2023

PE1967/G: Protect Loch Lomond's Atlantic oakwood shoreline by implementing the high road option for the A82 upgrade between Tarbet and Inverarnan

A response to submissions from Transport Scotland (TS) and The Loch Lomond and The Trossachs National Park Authority (LLTNP)

TS's appraisal ignores "The Principle of Place", an understanding of what the public want from any change. That requires an analysis covering economic and environmental impact, public transport, active travel and recreation. Because of the location in a National Park, adjacent to one of the most famous and beautiful bodies of water in the world, a "full" STAG appraisal is legally required for TS to comply with its own rules.

Furthermore, we have found evidence that the DMRB analysis has errors and inconsistencies in relation to requirements for and costing of tunnels, viaducts, cycle paths and road closures.

LLTNP is silent on the benefits, costs and implications of this huge public investment for the crisis in nature and for people living in and visiting the Park, despite it saying on page 73 of their recently published [*Draft National Park Partnership Plan*](#),

"A long-term collaborative and coordinated approach to visitor services and infrastructure, as well as managing pressures, could have huge benefits for visitors, communities and businesses as well as supporting climate and nature objectives"

We agree with LLTNP when they say,

"The road design as currently presented raises a number of significant environmental concerns..."

The alternative high-level route proposed by the petitioners is a concept that has not been developed or examined in any detail..."

confirming our position that Transport Scotland has never properly explored the High Road option.

We don't accept that all the slopes are "very steep". In the scenically and ecologically valuable rugged area north of Inveruglas we suggest

tunnels and viaducts to preserve the cover of ancient birch woodland and provide wildlife corridors between upland and shoreside habitats. This would also keep the road relatively straight. Tunnels would have little or no scenic impact, whereas the engineering envisaged for the low road would be detrimental to the shoreline and its ancient oakwood. The low road envisages long viaducts bridging across two bays and extensive sections of cantilevering, completely ruining the shoreline environment (as has already been done at Pulpit Rock and with earlier improvement schemes further south). Due to the boundary effect, traffic noise from the new road will be intrusive along the West Highland Way which would not be the case if the road was higher up.

South of Inveruglas, the high route would follow the lower edge of commercial forestry where a scenic boundary already exists between dark Sitka and natural woodland below. Little or no natural woodland would be lost in this area.

It is the low road, which would go through the ancient woodland for much of its length.

Road workings in The *Garabal Hill geological SSSI* would be welcomed by researchers.

Regarding crossing the railway, there is already a need for a new railway bridge at Tarbet as the existing one is too narrow and presents road safety issues for people walking between the station and Arrochar. If the High Road was extended further up Glen Falloch, it could re-join the old road without re-crossing the railway.

Both options have to cross the same water courses. As the side glens are “hanging”, impact on the topography at the 70metre contour is minimal.

The old road will have services beside and underneath it which will be expensive to re-route and re-lay. This will not occur with the High Road option. (SSEN are about to carry out work in this area so there is an urgent need for co-ordination).

The low road cannot avoid having tight bends in some places, such as Pulpit Rock, because it is so constrained by the railway line and the shoreline. A high road would be much straighter.

The high road will not only be a far better option for the natural environment, it will be the best option for the local population and visitors. In the current circumstances, it is probably the best opportunity the National Park will ever have of achieving at least some of the laudable aims listed in its Draft National Park Partnership Plan, the introduction to which talks of,

“supporting the rural economy and communities... providing a range of wider benefits, including more investment, business and employment opportunities, for everyone living and working in the National Park.”

The High Road upgrade we envisage would deliver more for countryside access, visitor management, business, nature and public health than any other current measure.

Not only will the occupants of Tarbet and Ardlui be spared the dust, din and danger of 6million vehicles a year, a “High Road” A82 upgrade will be an opportunity to create a more or less continuous 20km linear waterside park in this amazing landscape. It would be dedicated to nature and its enjoyment through walking, cycling, camping, water sports and picnicking. Traffic along the old road would be slow moving and limited to servicing local properties or for visitors accessing beaches and loch side camping spots and picnic sites. Most access to the area would be by public transport and cycle. As with Loch Katrine, cycle hire would be viable with the railway, bus and ferry operators geared up with facilities. We foresee the extension of the Three Lochs Way Great Trail to Ardlui, where a footbridge could link the 3 Lochs Way and West Highland Ways encouraging the re-opening of the currently abandoned MacGregor’s Landing hotel/hostel. Preservation and regeneration of the untouched and venerable shoreside temperate rainforest would be a high priority and we envisage paths and information boards explaining the importance of this rare natural environment.

The new road would release the old road for this new role like examples in Scotland (Killiecrankie) and in the Alps (Lake Como). A High Road would neither wreck the lacustrine littoral environment, nor destroy what is left of the original Wade Road, nor hold up the large volumes of through traffic which uses the A82.

The alternative to the High Road is a two-lane, straightened, but still fairly winding, road adjacent to, or sometimes actually out over the Loch, passing through the villages of both Tarbet and Ardlui.

We agree with the *National Park Draft Plan* when it says,

“We need to co-ordinate investment and strategically plan across all publicly managed visitor sites and routes to make sure we can meet changing visitor needs and expectations”

and it prompts us to ask, in their words, *“If not here, then where? If not now, when?”*

Even without the massive recreational, quality of life and road safety benefits of the High route, we have considerable difficulty in understanding how anybody could regard these two alternatives as having a similar environmental impact.

We sincerely believe that the welfare of Scotland will be significantly enhanced if the High Road route is chosen for a rebuilt A82 between Tarbet and Inverarnan. We are simply seeking the legally required appraisal that will test that belief.

John Urquhart

Convener *Helensburgh and District Access Trust*

Vice Chair *The Friends of Loch Lomond and The Trossachs*