Shocking Lack of Ambition on the A82

Wednesday 20 September, 2023

The Parliamentary Petitions Committee has just accepted a further joint submission from two charities, the conservation pressure group, Friends of Loch Lomond and The Trossachs (FOLLAT), and the countryside access body, Helensburgh and District Access Trust (HADAT). The submission is in response to Transport Minister Fiona Hyslop's written answer to the Committee on Transport for Scotland's (TfS's) increasingly controversial A82 upgrade proposal.

HADAT and FOLLAT Chair, John Urquhart said,

"Fiona Hyslop's letter is a predictable regurgitation of the position that TfS has done everything correctly. The truth is they haven't. Her admission of the possibility of a public local enquiry is at least a step in the right direction.

"Consultation on both projects has been woefully inadequate. The special qualities of the landscape are not being recognised, nature and natural processes given scant attention or ignored and golden opportunities to improve life for residents, visitors and travellers squandered.

"The Low Road solution for the A82 from Tarbet to Inverarnan will destroy large areas of irreplaceable Atlantic oakwood forest and blight 8 miles of Loch Lomond's bonny banks with tarmac, concrete, steel and roaring, polluting traffic. Unlike Pitlochry and Killiecrankie, which were by-passed in the 1980s by the newly improved A9, the villages of Tarbet and Ardlui will be forever sentenced to the constant din and dust of 6 million vehicles annually passing within a few feet of front doors, pavements and primary school. And, enhanced by reflection from extensive rock cuttings, the boundary effect will ensure traffic noise is transmitted clearly across the loch's surface to the West Highland Way where walkers might have been hoping Scotland's premier "Great Trail" would allow them respite from that kind of thing.

"The lack of ambition and imagination of the public bodies involved is truly shocking and it is beyond understanding how such a disastrous solution on the A82 could ever have been deemed optimal when the 1980s example of the Pass of Killiecrankie was there, plain for all to see. In those days it seems we had politicians and public servants who had a better grasp of what makes sense. They put the new A9 high above the existing road and the railway line, thus freeing the old road for use by local traffic and for cyclists and walkers to safely enjoy the scenic splendour of the River Garry, its historic gorge and ancient woodland - all free from traffic noise. Why can't we do the same with the A82 and save those precious 8 miles of loch shore?"

See below for full text of the submission:

Petitioner submission of 13 September 2023

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

The Minister's submission adds nothing to the evidence presented so far by Transport Scotland who continue to demonstrate an appalling lack of integrity, imagination and ambition in relation to this badly needed A82 upgrade. The obvious failure to fully implement the STAG process merely adds emphasis to how badly advised the Scottish Government has been. No matter which solution is finally adopted, this project represents the biggest single cash investment the National Park will have seen since its inception and yet opportunity after opportunity has been missed to involve relevant stakeholders and thereby identify and evaluate the huge potential a High Road solution presents for the environment, wildlife, residents and visitors.

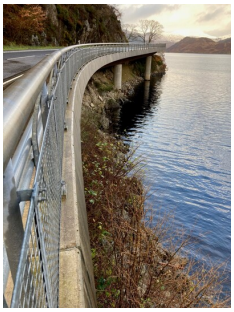
The Minister for Transport's submission states:

"*STAG involves the appraisal of generated interventions which could potentially address identified problems and opportunities against a range of criteria and provides a key part of the Strategic Business Case for options taken forward."*

Yet, the 5 Transport Planning **Objectives** (TPOs) identified in Transport Scotland's document say nothing about identifying opportunities to improve road safety and quality of life in Ardlui or Tarbet. This fundamental omission is one of the more glaring demonstrations that a proper STAG process was never carried out. The TPOs are also silent on a number of other fairly obvious "problems and opportunities".

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For example, it is well known that there are major issues around the scarcity of safe, high-quality access to Loch Lomond's beautiful shores, especially for those members of the public who don't possess a car or who for one reason another, can't walk along the West Highland Way trail on the loch's eastern shore. This results in huge visitor pressure at the few spots which have access to the water, and which can easily be reached by car or in a few cases by using public transport – viz. Duck Bay, Balmaha, Balloch and Luss. A High Road solution would of course free up the old road so that it could become the largest (and longest) lochside car park in the National Park – at a stroke releasing the intolerable visitor pressure which regularly develops at Luss, Duck Bay and Balloch. This obvious opportunity never seems to have occurred to Transport Scotland or their consultants. Had the Friends of Loch Lomond or Helensburgh and District Access Trust, and other local bodies, been consulted we could have told the consultants about this and of our long-held aspirations to extend the Three Lochs Way Great Trail to Inverarnan, something which would be eminently possible if a High Road solution was adopted. But we were never consulted - another indication that a proper STAG analysis was never carried out.

The Minister's submission also states:

"Transport Scotland has considered the petitioner's alternative proposal … the A82 Tarbet to Inverarnan scheme."

Of course, the High Road would have "*considerable engineering and environmental issues*", but so would the Low Road. Extending viaducts across two embayments, and considerable lengths of road deck cantilevered out over the shoreline won't come cheap and will do immeasurable damage to one of the National Park's principal assets – the tree lined, beautiful, precious and wildlife rich "bonnie banks" of Loch Lomond.

We do not agree that a High Road would have an "*increased detrimental effect on Ancient Woodland Inventory areas when compared to the preferred* [low road] *route option*".

As we have pointed out before, south of Inveruglas, the high route would be along the edge of a mature coniferous plantation which is now undergoing harvesting. A new road there with its accompanying landscaping and planting would actually enhance the existing impoverished biodiversity. North of Inveruglas, the high road would be in tunnels and cuttings or on viaducts, so there would be minimal loss to the mainly birch woodland there which, compared with the dense oakwood canopy along the loch side, tends to be patchy and relatively sparse anyway due to historic overgrazing and the rugged nature of the topography.

Contrary to the Minister's submission, we have clearly stated that the existing A82 would require to remain in place to provide continued access to land, property and tourist facilities. Furthermore, given the very light traffic it would have, we see no good reason why the existing route could not be repurposed to active travel, exactly what has been done further south at Firkin, and exactly what was done 40 or so years ago at Killiecrankie.

We hope that the Minister for Transport will come before the Petitions Committee to respond to the points we have raised above and explain why the Government continues to support such an ill-advised, short sighted and damaging scheme.

We also hope that she will accompany the Committee should it take up the option to visit to the site, at which point we would be very happy to explain our case in more detail.

In the event Transport Scotland proceeds to the publication of the draft Orders, we welcome the assurance that stakeholders will have the opportunity to provide formal comment or objection to the proposed scheme during the following statutory consultation period. In that case we wish to record in the strongest terms our desire that a Public Local Inquiry be held so that the many objections we and others have to this damaging proposal can be heard.

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