



8th December 2021

Ref:TWGR/A82/2021

Dear Sir/Madam,

CONSULTATION RESPONSE-A82 TARBET TO INVERARNAN UPGRADE

Background

On behalf of the independent and long-established conservation and heritage charity, the Friends of Loch Lomond and The Trossachs, I am writing to submit our formal response to the recent consultation exercise on the recently published plans for the strategically important A82 trunk road link between Tarbet and Inverarnan on Loch Lomondside which is a very environmentally sensitive and popular recreation area in the Loch Lomond and The Trossachs National Park.

We welcome the opportunity to comment on the proposals which are the subject of this consultation exercise, and we are pleased the design team, along with a representative from Transport Scotland, afforded us the opportunity to have a special two-hour session with them to learn more about the detail of the proposed scheme and to allow us to question them on aspects of the scheme that were of particular concern to us.

We considered there was insufficient information provided online to assess the scheme properly and this session was very helpful in clarifying design approaches and the scale and nature of potential impact of the proposals. It also enabled us to express our concerns on several key issues which are covered in more detail below.

We welcomed the extension in time to submit this consultation response that has been compiled by a small sub-group and subsequently endorsed by our full Board of Trustees. The Board is made up by a good spread of tourism, planning, geography, architectural, finance, farming, and marketing specialists as well as community representatives, including the Chair of the Arrochar & Tarbet Community Development Trust, whose area the proposed A82 upgrade scheme lies within.

We have been involved in previous consultations relating to upgrading the A82 on Loch Lomondside, since our formation in 1978 with one of our main purposes being to protect and promote the scenic beauty of internationally famous Loch Lomond and the wider area. We successfully campaigned with others to secure National Park status for the area due to its special natural and cultural heritage qualities and to better manage visitor pressures. Loch Lomond is one of Scotland's top five tourist destinations for overseas and UK tourists, as well as being the most popular and heavily visited countryside day trip destination in Scotland, due to its proximity to major centres of population and the extensive range of outdoor recreational opportunities available.

More recently in 2015, we were represented at the A82 Tarbet to Inverarnan upgrade stakeholders' meetings held in Arrochar when route options were discussed, and it was confirmed the preferred option had been selected. At that time, we expressed the view that some of the other route options were dismissed too lightly in favour of a more 'minimalist preferred route' broadly following the line of the existing A82 which hugs the shoreline of Loch Lomond and is wedged in below the West Highland railway line in very challenging terrain.



We therefore have a strong sympathy for the submission that has been made to the current consultation by Helensburgh & District Access Trust (HADAT) who argue that the upgrade of the A82 north of Tarbet offers a once in a lifetime opportunity to improve the visitor experience for the many millions of travellers to Loch Lomond, or passing through the area each year, and that a better and more inspiring solution in keeping with the National Park setting and status is required. We believe there is a case to re-examine the feasibility of the 'high road' option above the railway line now that it is clearer what the scale of the environmental impact of the 'low road' option will be and the limited recreation opportunities that will be created repeating some of shortcomings of the earlier A82 upgrade between Arden to Tarbet.

There would be merit in comparing the benefits and disbenefits of an enhanced version of the current 'low road' shoreline option with a more in dept review of the 'high road' option. It is accepted, due to the difficult terrain, there are considerable constraints arising from both these options, but it is important that we get this right. The final scheme should be capable of being benchmarked internationally and match some of the finest scenic and strategic through routes successfully developed in National Parks in other countries.

We contend that circumstances have changed significantly in recent years due to the climate emergency and the surge in popularity of Loch Lomond as a recreational resource as a direct result of COVID 19 and, consequently, a bolder solution is required. There should be a pause to re-examine the optimal solution which will leave a better legacy for the benefit of current and future generations that is truly worthy of the unique setting of Loch Lomond and its place in the worldwide family of National Parks.

The remainder of this submission is focussed on providing what we consider are constructive comments on the current scheme which is the subject of this consultation.

Importance of National Park Setting

We are aware that National Park Authority staff have been providing advice and guidance on detailed aspects of the current scheme and along with others, including the Friends, has lobbied successfully for a more strategic approach to be adopted for this project as opposed to the earlier piecemeal upgrades planned over a 10-year period. They also rightly pushed for Transport Scotland and their appointed design team to come forward with a scheme that went beyond the boundaries of the normal Transport Road Design process and fully recognised the importance of the National Park setting the upgraded route passes through.

We are disappointed that the current route design proposals fall well short of what is required in this sensitive National Park setting, notwithstanding the considerable engineering and environmental constraints that exist. There is little evidence that the scheme currently being presented does break out of the standard Transport Road Design Manual guidance which was regularly quoted to us during our recent session with some of the Design Team members. In several respects the design proposals follow the more 'minimalist approach' adopted for the current A9 reconstruction between Perth and Inverness with many opportunities to capitalise on the unique setting of the National Park not being fully realised compared to some strategic scenic

and through routes developed elsewhere in Europe and in North American National Parks where more is made of the special natural qualities with imaginative wildlife crossings, scenic lookouts and associated recreational infrastructure.



Trans-Canada Highway wildlife bridges and scenic lookouts in Banff & Jasper National Parks



While efforts have been made to make use of pockets of land for recreational purposes with the realignment of short stretches freeing up parts of current A82, and viaducts are proposed at several locations to reduce the number of high impact rock cuts, the proximity of the proposed cycleway/walkway very close to lengthy sections of the new route is of concern as are the high visual impacts of rock cuts which vary in height from 15 metres to 50 metres, and the loss of extensive protected ancient oak woodlands. We are also very disappointed that more extensive improvements in the Tarbet area are not proposed for the benefit of villagers who suffer from high traffic volumes using both the A82 and A83.

A more ambitious scheme that truly embraces the unique setting of the route in this part of Scotland's first National Park is required which is more aligned with the vision set out in the National Park Plan which states:

"We want the National Park to be an internationally-renowned landscape where nature, heritage and land are valuable assets, managed and enhanced to provide multiple benefits for all; there is a high quality, authentic experience for people from all backgrounds with many opportunities to enjoy recreation activities and appreciate the area's outstanding natural and cultural heritage within an internationally renowned landscape; and businesses and communities thrive and people live and work sustainably in a high quality environment."

More specifically, we are anxious to ensure lessons are learned from previous upgrading schemes south of Tarbet where we consider there are some shortcomings with the cycleway running very close to lengthy busy stretches of the A82; poorly designed laybys suffering from extensive damage from vehicles pulling onto road verges; poorly maintained landscaping features with parts of stone walls and rip rap falling into the loch; shrub planting acting as long term litter traps; and vegetation becoming overgrown creating tree tunnels with limited views of the loch and screened pull-ins which are regularly used for fly-tipping. It is important low maintenance design and landscaping features are built into the proposals for the upgraded Tarbet to Inverarnan route scheme and great care is given to how the various sites which provide longer stay rest and recreational opportunities are designed and developed.

More Detailed Design Issues and Comments

Tarbet-A82 Junction with A83 – The retention of the existing arrangement is not considered to be the "most appropriate" solution and falls well short of what is required to ensure the village secures some tangible benefits from the A82 upgrade, including safer access arrangements to the primary school which has a school roll of over 60 pupils together with a pre-school Nursery group. We are strongly in favour of introducing a roundabout here with improved access arrangements to the Tarbet Bay car park where a dedicated dropping off and pick up point could be introduced for schoolchildren, with a new pedestrian bridge link to the school on the lower part of this site. There is surely scope to build this into the plans the National Park Authority is working on at present to improve the functionality of the Tarbet Bay site where there are growing pressures from motorhomes and conflicts with other site users.

There is a great opportunity to improve the junction for (1) northbound A82 traffic from the south, (2) southbound traffic from the north and A82 that await long convoys of A83 traffic coming from Rest and Be Thankful (RABT) traffic controls; and (3) westbound

traffic coming from the A82 north of Tarbet that are also held up with the need to give-way to A83 traffic southbound. This has significantly built up since the 2019 survey due to continuous RABT traffic control measures.

There are traffic conflict issues for northbound traffic coming from the south that turns into the Tarbet Bay car park where there are toilets, a scenic viewpoint, a boat launching jetty and a popular effluent disposal point for campervans and motorhomes, as well as the nearby cruises and ferries from Tarbet Pier with large passenger volumes which are popular with coaches. They all have to take a right hand turn across oncoming traffic from the A82 travelling south and there is frequently a build up of queuing traffic back to the junction.

One of our Trustees is a resident at Ballyhennan Crescent and he regularly witnesses many vehicles coming from the south who miss the A82 northbound turn-off and have carried straight through the junction assuming A82 is continuous. They round the corner and see signage for A83 Inveraray & Campbeltown and suddenly realise they have to return to the junction. Cyclists also have problems safely negotiating the junction for journeys linked to using the West Loch Lomond cycle route from Balloch to Tarbet and taking onward journeys to Arrochar and Ardgartan.

There are further Trunk Road problems before and after the junction on both the A83 and A82 :

(1) South of the junction on the A82 there is blind summit on entering the 30mph speed restriction, this is followed by a sharp turn off to the Tarbet Bay Pier and a private house.

(2) West of the junction on A83 to Arrochar & Campbeltown there is a 90 degree bend bounded by walls on both sides of the road that also supports a pedestrian and cycleway that has seen many delays and incidents, with HGV unable to pass easily side by side.

(3) North of the junction with a number of residential and business access roads there is also Arrochar Primary School and pre-school Nursery. It's playing fields straddle the A82 and problems have arisen over school transport that requires the large bus coming from Arrochar to pass the school and continue north to Tarbet Isle, in order to turn and allow pupils to disembark the bus into the school on it's nearside. Other drop off manoeuvres for taxi's and parent transport are also considered to be dangerous. Staff and professional services attending the school over the day have to park off-site and walk there due to insufficient parking provision.

If combined A82 and A83 traffic is to travel on one road or the other, at some stages of RABT and A82 construction, traffic volumes passing the school in future will increase risk levels for school operations and, safe and healthy travel plans for staff, parents and children.

With a projected £150 million of investment to improve 17 miles of A82 from Tarbet to Inverarnan, with high cost mitigation measures for ecology, wildlife, habitat and the landscape aesthetics for visitors passing along Loch Lomondside, surely a higher proportion of budget and innovative design should be invested for the benefit of the local community and their children to provide a safer future.

The storymap concludes that the A82 / A83 junction is to remain as it is, with few RTA's and excessive tailbacks on "record". The definition and criteria for what constitutes an "excessive" tailback is not provided and the experience of locals does not match this description as residents have witnessed numerous tailbacks in busy holiday periods due to the changed characteristics of "staycation visitors", A83 convoy traffic coming



from the A83 RABT and increasing number of road closures due to RTA's on the busy roads network.

The data refers to 2015—2019. Can more recent survey data be made available taking account of the changed circumstances ?

Forward Visibility and Views from the Road- One of the aims in upgrading the A82 north of Tarbet is to “improve forward visibility.” This would also have applied to the A82 between Tarbet and Luss when the previous upgrade was undertaken. However, over the years with unchecked growth of roadside vegetation and self-seeding trees, it is now a “tree tunnel” in many sections, with left-hand bends obscured from long range “forward visibility” and limited views of the Loch and Ben Lomond. This could well happen again with this design if appropriate landscape design and maintenance programmes are not adopted. It is important to get the balance right between the type of planting and vegetation on road verges, retention of some open views of the loch and maintenance regimes which are inexpensive and easy to implement.

Currently the Friends have a heavy annual commitment to retaining some views of Loch Lomond between Luss and Tarbet and organising volunteer ‘Make a Difference Days’ which are necessary due to the under-investment in roadside maintenance of this strategically important tourist route. When this upgrade scheme was first designed various pledges were made about maintaining the landscaping beside laybys, at viewpoints and keeping a number of views open of the Loch and Ben Lomond but, sadly, this was soon forgotten and not followed through over the years which has led to the emergence of a tree tunnel and some ‘hostile’ and secluded lay-bys where fly tipping is prevalent. This should not have to be the case and we would stress the importance of adopting landscape solutions as part of the Tarbet-Inveruglas upgrade that will work for the long term.

Mitigating Disruption during Construction- More clarity is required about the... “consideration of mitigating disruption to road users and the local community during construction of the scheme” ..., as currently walkers, particularly accompanied by young toddlers, animals and cyclists have a very poor and intimidating experience alongside the A83 and A82 due to design and traffic control measures now north and west of Tarbet (RABT & Glen Kinglas) resulting in long lines of traffic including many HGV's, commercial vehicles with trailers, buses, vans and motorhomes, due to noise, spray and dazzling lights in dim daylight.

A comprehensive mitigation plan should be prepared in close consultation with the local community as the level of disruption while the road is being upgraded is likely to span a lengthy period, with massive disruption and deterioration in the quality of life which is currently adversely impacted upon due to the disruption caused by the closures and follow up works at the Rest and Be Thankful on the A83.

Cycleways and Walkways/ Rail and Bus Links- The proposed design and location of walkways and cycleways in very close proximity to the upgraded highway is one of our major concerns and we strongly recommend some further work on design options to make the walkways less intimidating and safer is undertaken.

See comment on existing West Loch Lomond Cycle path which is adjacent to the A82 South of Tabet to Luss <https://www.seelochlomond.co.uk/discover/west-loch-lomond-cycle-path>).

Further opportunities to take the walkway/cycleway away from the upgraded road and/or to introduce the asset at a different level would be desirable. We welcome the efforts to introduce walkways/cycleways as part of creating safer active travel routes



in this area and contributing to more recreational opportunities for residents and visitors but we firmly believe the scheme could be so much better with a little more thought to potential solutions which are more appealing and safer for all to use.

In the storyboard material it states: "the communities along the route will be enhanced with safer walking and cycling routes while the new bus lay-bys in Tarbet and the rail station in Ardlui will also be more accessible." While there are plans for improved bus bays at Tarbet we would recommend that a more radical approach is adopted and consideration is given to introducing an enhanced bus interchange to include both A83, A82 and loch ferry routes from Tarbet to improve the situation for public transport travellers. We note in recent times there has been investment at RABT and a Lochgoilhead bus interchange with an off-route bus drop off and pick up area to deal more effectively with road safety issues for bus travellers and would ask that serious consideration is given to safer arrangements with such an interchange at Tarbet.

The proposals to improve access to Ardlui Station are welcome however we consider more could be done to improve safety for walkers crossing the road to use the train services with possibly an underpass. Further enhanced road crossing points for walkers do not seem to be included for hotel and caravan park walkers which is regrettable given the busy nature of this area and the existing speed limit of 40mph.

The scheme includes proposals for an improved junction providing access to the visitor centre in Inveruglas. However, it does not include a bus stop on either side of the carriageway for hill walkers using the popular pathway to Glen Sloy which we consider is an important omission given there is an emphasis on promoting outdoor activities and the use of public transport. The current 'hail and stop' arrangement is unsatisfactory with buses incurring dwell times on the main carriageway while walkers, climbers and campers get off or on with rucsacks resulting in build ups of traffic at what is already a very busy junction with vehicles turning in and out of the Inveruglas Viewpoint & Visitor Hub.

We welcome the commitment to introducing an important missing link in the 'around Loch Lomond' walkway network but consider there are better solutions available that would be safer and more appealing to a range of potential users. Recreating what has happened on southern stretches of the A82 and more recently at the Pulpit Rock upgrade with the cycleway/walkway hugging the busy road verge for lengthy sections is simply no longer good enough and is not in keeping of the spirit of the National Park vision set out earlier in this response.

More imaginative design solutions for creating safer and more family friendly and appealing walkways and cycleways near the upgraded stretches of the A82 merit further consideration given the growing recreational importance of the Loch Lomond area and the push towards encouraging more active travel. We appreciate the constraints that exist with this choice of route for the A82 upgrade but strongly believe there is potential to take more stretches of the proposed walkway/cycleway further away from the road. Where this is not possible the creation of an outer wakway/cycleway at a lower level on the viaducts, for example, would create a safer and more appealing experience for users.

The photo below of the recently upgraded Pulpit Rock stretch of the A82 clearly illustrates how intimidating and potentially dangerous constructing a walkway/cycleway so close to a busy and high speed highway is and we would urge the design team to re-visit the current plans for a number of stretches of the upgraded A82 and

come forward at the next design stage with more user friendly and safer options for cyclists and walkers.



Pulpit Rock Upgrade with the walkway/cycleway right next to the busy carriageway.

Treatment of Loch Edges- Opportunities to soften the edges of the proposed realigned and upgraded road should be explored further to support the drive for more nature-based solutions which contribute to biodiversity and reduction of environmental impacts. In the current proposals there are many stretches with hard edges and visually intrusive rock cuts and landscaping features could be introduced to 'green' the edges of the upgrade more but in a way that retains views and is easily maintained but minimises visual impacts from the loch itself and the eastern shore where there are thousands of walkers following the West Highland Way and have expectations of being in high scenic and wilder areas.

We have concerns about the damage to lochside vegetation that will occur as part of the road with a mixture of road straightening, build outs over the loch and lengthy viaducts. Again, this is well illustrated in the photo below of the build out over the loch at Pulpit Rock where we consider more could have been done to establish vegetation to reduce visual impact and contribute to biodiversity.

There are significant implications for wildlife on the loch shores too arising from the proposals and we are pleased to note that National Park staff have been helping to identify sensitive areas linked to habitat assessments. We welcome the mitigation measures proposed including the provision of mammal ledges in drainage culverts and tunnels, new features for otters on the lochside and restoration of some areas of woodland habitat. However, further work on introducing more extensive mitigation

measures that minimise the impact on wildlife requires to be considered further at the next stage of design.

Extent of Rock Cuts- We are disappointed that so many rock cuts feature as part of the scheme with them varying in height between 15 and 50 metres with many south of Pulpit Rock being roughly 30 metres in height. Despite adopting the latest landscaping techniques to try and minimise the impact of these cuts there is no doubt they will have a high visual impact over a long period of time and contribute to destroying the intrinsic character and scenic qualities of the 'bonnie banks'. We appreciate this is probably the most cost-effective way of creating a realigned route but believe in some of the stretches where the visual impact of the rock cuts will be more severe there is a strong case to introduce canopies/shelves which would allow some 'roof greening not dissimilar to what is done along some of the routes in the Alps and elsewhere. This would also contribute to delivering more nature-based solutions and provide protection from falling stones or debris, as the rock surfaces degrade with climatic changes over time.

We understand the reasons for rejecting tunnels as part of the preferred design proposals but introducing some more radical landscape softening techniques such as green canopies would go a long way to reducing some of the visual and other environmental impacts which would be more in keeping in this environmentally sensitive part of the National Park.

Woodland Loss and Compensatory Planting- The scale of removal of ancient and non-ancient woodland is quite extensive and is one of the more significant environmental impacts of the current proposed road upgrade scheme. The scale of irreplaceable ancient woodland is regrettable, and we are not convinced the compensatory planting and translocation of the ground these trees are currently rooted in will be sufficient to deal with the significant conservation deficit.

If this scheme was being assessed against the core aims of the National Park it would be rejected on conservation grounds with adherence to the Sandford principle being a key determining factor. Importantly, the character of extensive stretches of the lochside will be changed dramatically because of the implementation of this major road upgrade. Many receptors will be adversely affected as highlighted in the storyboard documentation.

Access to Leisure and Recreational Opportunities – We have commented earlier on the deficiencies in the walkway/cycleway proposals and the lack of safe crossings for walkers and safe stop off and pick up points for hillwalkers and climbers but we are supportive of the plans to create six 'safe haven' sites for people using the route who require safe rest areas as well as for recreational purposes. However, we are disappointed that several times a reference is made to the development of facilities at these sites '*may be included within the proposed designed scheme*'.

We would like there to be a much stronger commitment to investing in these sites given the importance of Loch Lomond as a recreational destination and to partially compensate for the scale of environmental disbenefits associated with the A82 upgrade. It is important local residents and visitors have the opportunity to use these sites to enjoy the scenic qualities of Loch Lomond and associated outdoor recreational



opportunities. This needs to be more than a through route with some long term recreational and safe rest area benefits. Far too many of the recent road schemes developed in the UK have failed to truly capitalise on some of the scenic route principles adopted by many countries in Europe and the Americas with generous provision of scenic lookouts and recreational areas designed into road upgrade schemes.

The indicative proposals for each of the six sites are welcome and we are pleased to note the infrastructure proposals include scenic lookout features, picnic tables and importantly, litter bins. The various laybys proposed elsewhere on the route upgrade should also allow for the inclusion of litter bins as we have proved with our pilot 20 bin scheme south of Tarbet this year that they can make a big difference in what are heavily trafficked sections of trunk road in a popular tourist area.

We trust that the comments and suggestions in this submission will result in some changes to the final scheme and there will be further opportunities for meaningful consultation and input as part of the next stage given the scale of investment planned in such a sensitive scenic area and the long-term implications of any final adopted scheme. It is critically important that there are some added value environmental and recreational benefits delivered as part of this scheme and a good starting point would be re-visiting the minimalist proposals for the Tarbet area where more requires to be done to ensure there are more safety and amenity benefits for villagers.

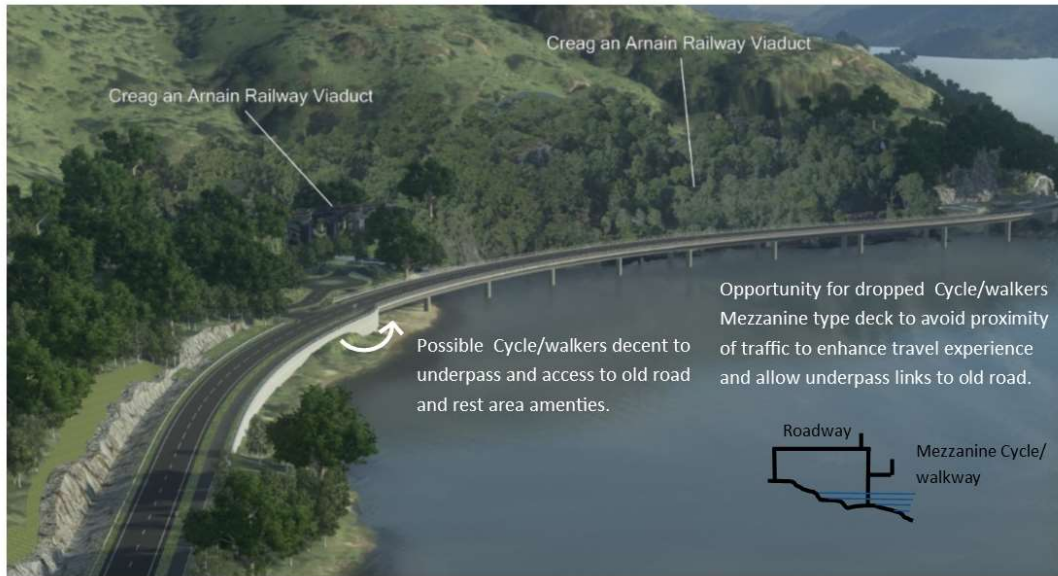
Yours faithfully,

Chair
Friends of Loch Lomond and The Trossachs
Working for the benefit of people and nature in Scotland's first National Park

Appendix 1 -Cycleway and Walkway Design Options

Consideration should be given to reviewing the options for the creation of a cycleway/walkway as part of the A82 upgrade for use by local residents and visitors in safer and less intimidating ways than currently shown. In addition to varying the levels opportunities should be taken to create more of a buffer area between the busy trunk road and the cycleway/walkway and where possible to take this much need amenity further away from the busy trunk road.

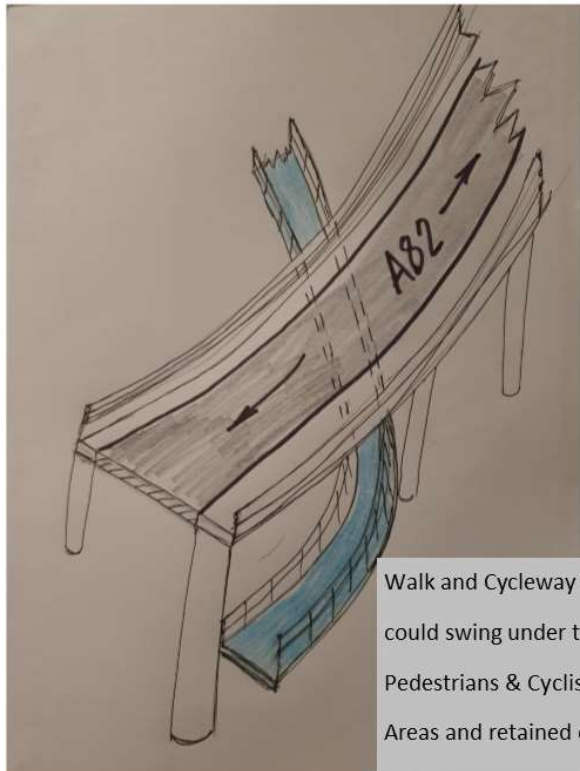
Below we illustrate some potential improvements that could be introduced to the upgrading scheme which would be of benefit to cyclists and walkers.



Creation of an **outer walkway** at a lower level would allow not only mammals to move from one side of the road to the other but visitors, for their full appreciation and enjoyment of the National Park.

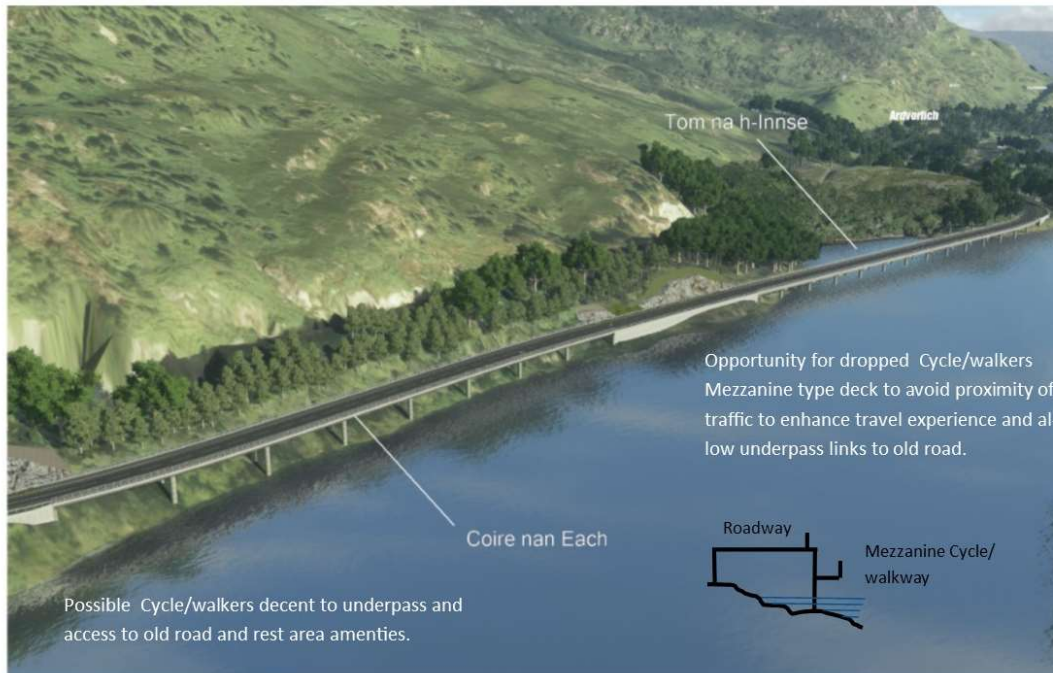
Current experience south of Tarbet has northbound lay-bys not only being used for short stops on long journeys, but also for viewing Loch Lomond and Ben Lomond. Some visitors walk across the carriageway to take photographs. This increases the risk of an accident with traffic speeds on some sections.



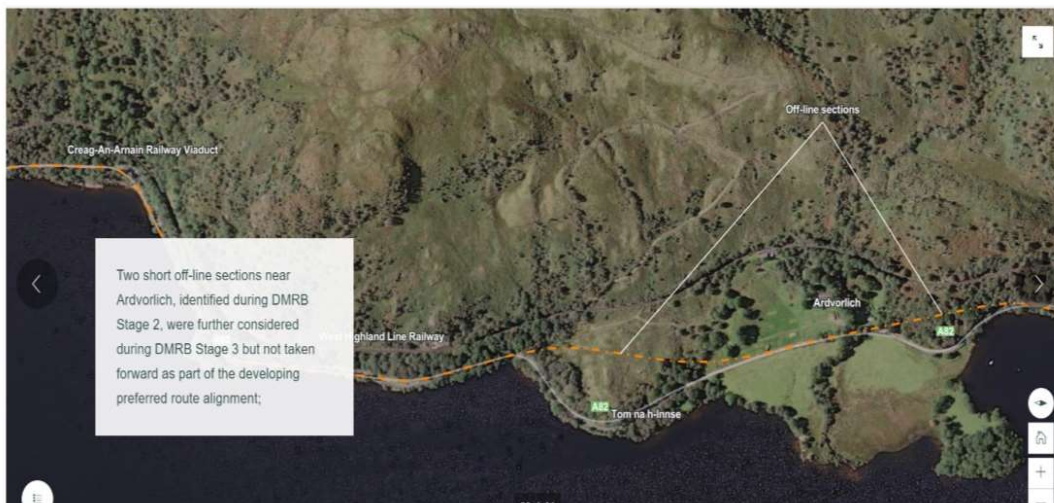


Walk and Cycleway on Outside of Carriageway at a Lower Level
could swing under the Viaduct / Bridge Structure to connect
Pedestrians & Cyclists Safely to inland Features, Amenity
Areas and retained old road sections.

Further Viaduct / Bridge proposal



3D Visualisation of the proposed Coire nan Each and Tom na h-Innse Viaducts (click to expand).



Further consideration and explanation on why the option shown above was discarded, as again giving walkers and cyclists primacy would see considerable benefit in this alignment providing old road access for recreation and family enjoyment of the Lochside and uninterrupted views of the Loch.

Alternative Roadway Options to enhance visitor experience & Safety

