

Transport Scotland's proposed A82 upgrade along Loch Lomond and the protection of ancient woodland

Description

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How to protect the bonnie banks

AS we await the Parliamentary Petitions Committee's next move on our A82 upgrade petition (A82 Petition – PE1967) offering Transport Scotland a High Road escape route out of its disastrous Low Road plan which threatens yet more of the country's priceless and diminishing temperate rainforest, I wondered if anyone in the Scottish Government would have bothered to watch the latest episode of David Attenborough's Wild Isles series (March 19).

In case you hadn't heard, Transport Scotland plans to put the upgraded A82 on more or less the same line as the existing road which closely follows the shoreline of Loch Lomond between Tarbet and Inverarnan, thereby doing untold damage to the rare and priceless Atlantic rainforest remnants which make those particular banks so bonnie and so valuable. We are trying to point out that it would be far better to do what was done at Killiecrankie in the 1980s when the upgraded A9 was put above the old road and the railway line, thereby leaving the old road for local traffic and recreational access to the ancient woodland along the banks of the River

Garry. They also by-passed Pitlochry and Killiecrankie, just like the new A82 should by-pass Tarbet and Ardlui.

**John Urquhart,
Convener, Helensburgh and
District Access Trust,
Helensburgh.**

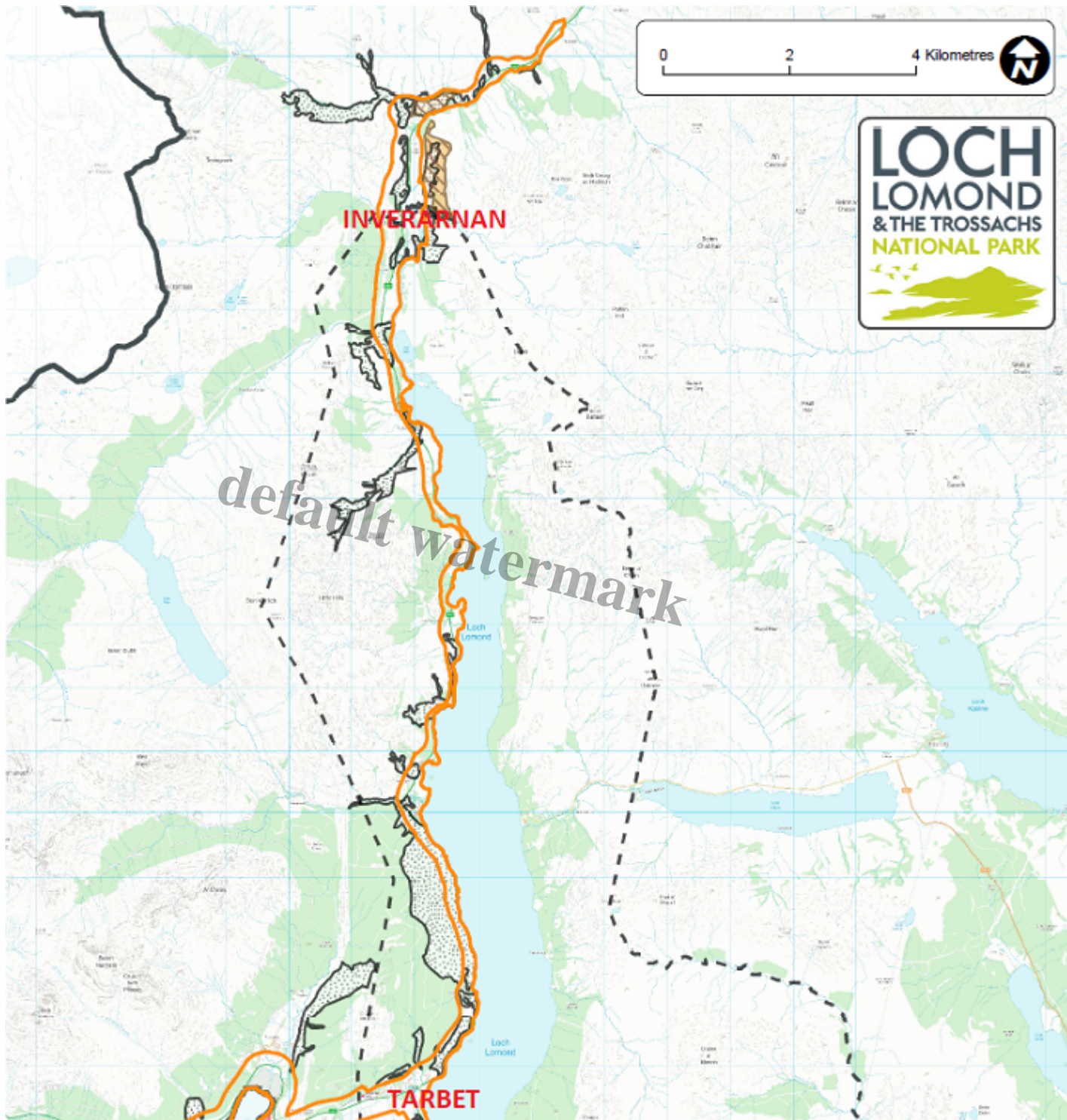
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Herald Letters 21st March 2023

Transport Scotland has gone silent about its plans ([see here](#)) to upgrade the A82 along Loch Lomond since the Helensburgh and District Access Trust (HADAT) lodged a complaint with Audit Scotland about the process last summer ([see here](#)). It is good to see that HADAT is keeping up the pressure, both with its petition to the Scottish Parliament asking for an alternative route to be considered (you can sign [here](#)) and with wider publicity such as this excellent letter published in the Herald last week.

Why, one might ask, doesn't Loch Lomond deserve to be protected every much as Killiekrankie? This post will consider the impact the proposed upgrade would have on ancient woodland and will argue that as a result of new Scottish Government policy Transport Scotland's proposed route now needs to be changed.

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Extract from papers submitted to Scottish Ministers in support of the camping byelaws, showing areas of ancient woodland along the west shore of Loch Lomond and the proposed camping management zone (outlined in orange).

One of the reasons the Loch Lomond and Trossachs National Park Authority (LLTNPA) used ten years ago for introducing the camping byelaws was the alleged impact that campers had on ancient woodland. The presence of ancient woodland was used to justify the camping management zone along the west shore of Loch Lomond, the same corridor of trees that would be affected by Transport Scotland's proposals to upgrade the A82 between Tarbet and Inverarnan!

The hypocrisy and double thinking of the LLTNPA in respect to protecting the west shore of Loch Lomond has been breathtaking. Four years later in their National Park Partnership Plan they committed to supporting the proposed upgrade with no reference to the impact this would have on ancient woodland, on the spurious grounds that it would enhance opportunities by the public to enjoy the landscape!

Conservation Priority 2.1

Landscape & Heritage

The National Park Authority, and its partners, will work to conserve and enhance the special landscape and cultural heritage qualities of the area by:



- › Ensuring that developments and projects recognise the need to protect and, where possible, enhance the qualities of wildness, tranquillity, dark skies and the historic environment.
- › Supporting projects that enhance opportunities to enjoy landscapes, particularly along major transport routes and around settlements, including implementing a strategically planned and designed upgrade to the A82 between Tarbet and Inverarnan, and continuing to review landslip management measures on the A83 at The Rest and Be Thankful.
- › Prioritising spatially targeted landscape enhancements that also deliver improvements for nature such as woodland creation, re-structuring of commercial forestry blocks, wetland restoration or tackling invasive non-native species.
- › Safeguarding and restoring tranquil loch-shores through initiatives including the Your Park camping management programme and Respect Your Park campaign.

Who can help deliver Outcome 2?

Listed below are partners who have committed to helping deliver these outcomes (Lead Delivery Partners) and those who could provide further support (Support Delivery Partners).

Lead Delivery Partners:

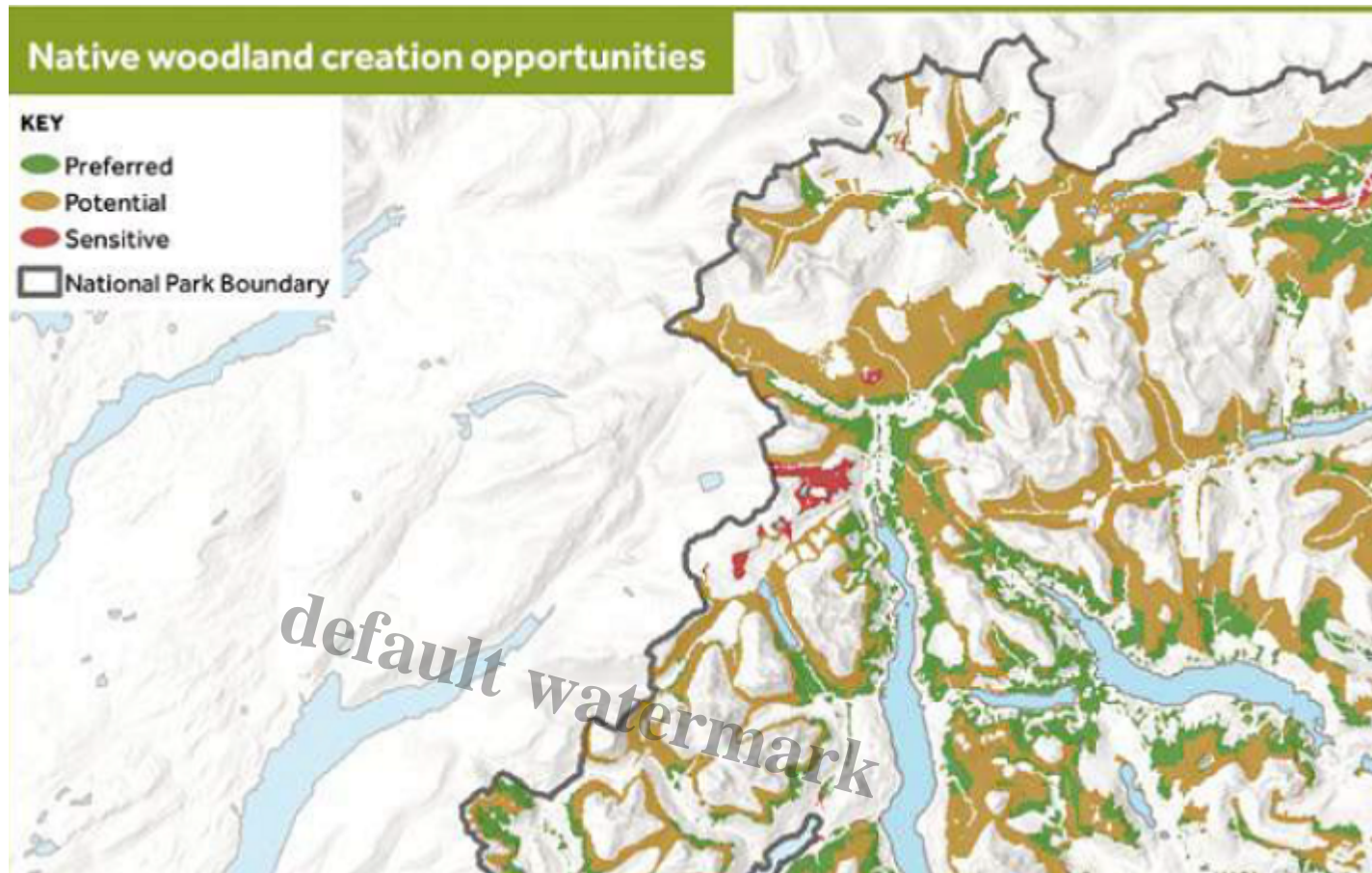
- › Scottish Natural Heritage
- › Forestry Commission Scotland
- › Forest Enterprise Scotland
- › Historic Environment Scotland
- › Transport Scotland
- › ScotRail
- › Police Scotland

Support Delivery Partners:

- › Private and NGO Land Managers
- › Local Authorities
- › Scottish Land & Estates
- › National Farmers Union Scotland
- › John Muir Trust
- › Friends of Loch Lomond & The Trossachs
- › Friends of the West Highland Lines

The claim that the camping management zone had served to restore tranquillity to the loch was nonsense: most of the campers along this section of shoreline were anglers who had every reason to keep quiet. But while advocating tranquillity, the LLTNPA was also supporting the construction of a faster road which would inevitably result in more noise!

Parskwat has previously highlighted the LLTNPA's failure to evaluate the impact Transport Scotland's proposals to upgrade the A82 in terms of its statutory duties to protect the landscape etc ([see here](#)), but I had not appreciated how the LLTNPA appear to have manipulated their Trees and Woodland policy to make it easier for the proposed development to go ahead:



Extract from LLTNPA Trees and Woodland Strategy 2019-39

Note how the west shore of Loch Lomond has been left white, in other words this is a strip of land where the LLTNPA sees NO opportunity for creating further native woodland despite the fragmented blocks of ancient woodland along the shore shown in their map above and despite claiming the vision in their strategy would:

â??Result in a strengthened native woodland habitat network across the National Park at all scales, allowing a wide range of woodland species to disperse, recolonise and migrate more easilyâ?•

The LLTNPA has also set out its vision for how it proposes to tackle the nature crisis, called â??Future Natureâ?•, which in my view is even more useless ([see here](#)). It contains just two references to woodland and not a single mention of the Atlantic Rain Forest. As is usual with the LLTNPA it contains no concrete proposals, let alone anything which would help restore the oak woods on the shores of Loch Lomond. The whole vision is meaningless spin.

National Planning Framework 4 (NPF4) to the rescue?

Happily for those concerned about the future of the National Park, many of the LLTNPAâ??s policy failures have now been made redundant by NPF4, policy 6 of which reads as follows:

Forestry, woodland and trees

Policy Principles

Policy Intent:

To protect and expand forests, woodland and trees.

Policy Outcomes:

- Existing woodlands and trees are protected, and cover is expanded.
- Woodland and trees on development sites are sustainably managed.

Local Development Plans:

LDPs should identify and protect existing woodland and the potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks. The spatial strategy should identify and set out proposals for forestry, woodlands and trees in the area, including their development, protection and enhancement, resilience to climate change, and the expansion of a range of types to provide multiple benefits. This will be supported and informed by an up to date Forestry and Woodland Strategy.

The implications of this in respect of the proposed A82 upgrade is the LLTNPA now needs to avoid endorsing any route that leads to "habitat fragmentation". Moreover they need to revise their Trees and Woodland strategy to explain how they intend to improve the "ecological connectivity" of the ancient woodland sites along the west shore of Loch Lomond!

The actual policy, which supersedes all previous policy adopted by the LLTNPA and Transport Scotland starts as follows:

Policy 6

- a) Development proposals that enhance, expand and improve woodland and tree cover will be supported.
- b) Development proposals will not be supported where they will result in:
 - i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;

This should cause both Transport Scotland and the LLTNPA to have a major re-think about the current proposed route, which has basically been adopted because it was thought to be the cheapest option. What price nature? With the LLTNPA about to launch a consultation on its a new National Park Partnership Plan, now would be a good time for them to abandon their support for the shore route and call on both Transport Scotland and the Scottish Government to come up with alternative proposals.

It is almost six years since the then Transport Minister, Humza Yousaf, announced that the A82 between Tarbet and Inverarnan would be widened to 7.3m ([see here](#)). Scottish Governments since then have ramped up their rhetoric about tackling the nature and climate emergencies and now appear more prepared to put their money where their mouth is. NPF4 has already had some impact in the Loch Lomond and Trossachs National Park, forcing Flamingo Land to amend their planning application at Balloch to exclude further areas of woodland ([see here](#)). The same principles now need to be applied to the West shore of Loch Lomond. Will the new First Minister now be prepared to admit he made a mistake and ask Scotland to develop an alternative route for the A82 for nature's sake?

Category

1. Loch Lomond and Trossachs

Tags

1. conservation
2. forestry
3. LLTNPA
4. planning
5. roads
6. Scottish Government

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