

## 3 Consultation

### 3.1 Stage 2 Assessment

Prior to the development of options for the scheme an initial meeting was held with the Loch Lomond and the Trossachs National Park Authority (LLTNPA) (30<sup>th</sup> November 2006) to inform the NPA of the scheme and to discuss any pertinent issues arising. These discussions highlighted that the LLTNPA generally look to support the need for upgrading the A82 and recognise Pulpit Rock as one of a number of problematical areas. This culminated in the attendance of LLTNPA together with the project team at an options workshop (12<sup>th</sup> June 2007) where preliminary options for the scheme were discussed and alternatives proposed for further development and amendment. A meeting was also held with SEPA (3<sup>rd</sup> July 2007) after they were unable to attend this workshop to discuss the scheme at an early stage in the development of the options. There was also continued dialogue with SNH concerning the scope of ecological surveys.

In addition several other statutory agencies were contacted, as well as those previously mentioned, to request information relevant to the study, and ask for preliminary views on issues that would need to be considered during option development. These consultees included:

- Historic Scotland (HS);
- Argyll and Bute Council;
- Loch Lomond Fisheries Trust (LLFT);
- Scotland Transerv;
- Network Rail; and
- Royal Commission on Ancient and Historic Monuments (RCAHMS).

Subsequent correspondence was held with a number of these organisations, and supplementary letters issued to the West of Scotland Archaeology Service (who keep cultural heritage records on behalf of Argyll and Bute Council), Sustrans Scotland and Cyclists' Touring Club (CTC) Scotland (Glasgow District Association). A summary of all correspondence received during the Stage 2 Assessment are provided in Table 3.1.

**Table 3.1** – Summary of consultation responses during Stage 2 Assessment  
(continued over)

Consultee	Date of Response	Response
Historic Scotland	22 <sup>nd</sup> March 2007	Noted that their response was concentrated on Historic Scotland's statutory remit at the National Level for; Scheduled Monument; Listed Buildings; Historic Gardens and Designed Landscapes. Noted that details of historic environment resources of regional or local importance need to be sought from the West of Scotland Archaeology Service. Advised of the presence of one Scheduled Monument

Consultee	Date of Response	Response
		<p>close to the proposed road improvements: Pulpit Rock, preaching site, south of Ardlui (index no. 10792).            Advised that no ground disturbance should take place within the scheduled area, and if possible within a 20m zone outwith the scheduled area. A copy of the monument schedule showing the extent of the area was supplied.            Supplied details of how best to protect this area during ground investigation works.            Provided an interpretation of the setting of Pulpit Rock.            Noted that the retention of a similar (or greater) degree of open aspect to the N and NE of the Pulpit Rock and the retention (or alternative provision) of safe public access to the site would be desirable in the final design.</p>
West of Scotland Archaeology Service (WoSAS) West of Scotland Archaeology Service (WoSAS)	5 <sup>th</sup> July 2007	<p>Noted that, aside from the Pulpit Rock, they did not have any archaeological sites recorded in the area that would be affected by the proposed upgrade works.            Noted that the Pulpit Rock was scheduled and that Historic Scotland should be contacted regarding this site.            Noted that the proposed road improvements may have the potential to disturb or destroy the Pulpit Rock and that the aim of any assessment should be to minimise the impact of the development on the monument and ensure its long term survival within an appropriate setting.            Noted that, due to artificially high water levels, there is a potential for unrecorded Crannogs to be present around the shores of the Loch and that, consequently, any proposals to build out in to the loch could disturb or destroy such sites.            Recommended that any survey of the loch floor adjacent to Pulpit Rock undertaken as part of the feasibility study should also attempt to identify whether Crannogs are present below the current water line.</p>
	4 <sup>th</sup> October 2007	<p>Provided SMR data as requested.            Noted that the line of the Tarbet to Crianlarich Military Road may be affected by the works.            Repeated concerns over the effect of the various proposals on Pulpit Rock.            Repeated concerns about previously unrecorded Crannogs but conceded that that the form of the land at this particular point may be too steep for Crannogs to be present.</p>
Sustrans (Jack Hunt - Land Manager : Scotland)	8 <sup>th</sup> February 2008	<p>Sustrans is aware that the LLTNPA have identified Tarbet-Crianlarich as a strategic off-highway route line, to make up a critical gap in the Park wide network of routes and Sustrans works in partnership with the LLTNPA.            Sustrans notes that the Trunk Road Initiative offers scope to create improvements to cater for all road users (including cyclists) at time of new trunk road works.            Sustrans state that on balance it would seem most appropriate to maximise the width of surfaced verge retained outwith the solid white road edge markings of the trunk road carriageways - whether the new road</p>

Consultee	Date of Response	Response
		<p>section is built in tunnel, on deck or through rock. Sustrans suggests that this width be maximised to achieve 2m unrestricted bitmac of the same surface as the new road itself, and free of drainage chamber heads, infill and other hazards, on both east and west sides of the new carriageways.</p> <p>This 2m surfaced road edge could be surfaced in bauxite chip to highlight its' purpose and status and to dissuade parking by public and roads service and maintenance vehicles. If reduced to be narrower than 2 metres, the edge route would not offer sufficient physical sanctuary from road traffic.</p> <p>A degree of better segregation could be provided by a raised verge strip rather than a stone drain infill which is not a good means of segregation, since dislodged infill would soon obstruct the cycle route.</p>
Argyll & Bute Council Development Services – Transportation & Infrastructure (Nicola Debnam - Transport Policy)	1 <sup>st</sup> March 2007	<p>A&amp;BC does not hold any cycling baseline information relevant to the study – only the previous Route Action Plan and the Economic Appraisal.</p> <p>The Council's aspiration has long been to achieve an acceptable road width (6m as an absolute min. – preferably 7.3m as Highway Link Design states) along the entire route (A82) with a one metre edge strips and formed verges. At pinch points in the network this would at least improve conditions for walkers and cyclists.</p> <p>The Council highlighted the Sustrans regional cycle route from Balloch to Tarbet (Route 40) and stated that it should be considered that walkers /cyclists may wish to continue on the A82 from this point (Tarbet). The Council also believes that access from the A82 to the various train stations on the route should be as easy as possible.</p> <p>The only concerns that A&amp;BC have about the A82 Pulpit Rock Improvements scheme would be that "adequate/safe" facilities are provided for cyclists (and walkers) whilst the Council did not identify any other issues "at the moment" that should be considered in the Stage 2 Report and subsequent environmental assessments.</p>
CTC Scotland (Glasgow District Association – Willie Dickson )	n/a	No consultation response received
LLTNPA (Carron Tobin – (Director of Rural Regeneration and Heritage Services) and David Harrison – Principal Planning Officer)	n/a	No formal response received – but views from the LLTNPA provided at the various Scheme Workshops which have been held during the study.
SNH (Darren Hemsley, Area Officer, Stirling and Argyll)	5 March 2007	Provided information and advice on Designated sites, protected species surveys, fish surveys, baseline habitat surveys, bird surveys and Landscape assessment. Further details are provided in Table 3.2

Consultee	Date of Response	Response
		which summarises the SNH responses in more detail.
SEPA (Lesley Dodds – Registry Manager SW)	24 July 2007	<p>Advise that there are no landfill / waste disposal sites, areas of groundwater abstraction or flooding areas identified within the search area.</p> <p>SEPA expect all possible pollution sources to be identified by the company(ies) involved and suitable mitigation measures to be determined for potential impacts arising from any ground investigation and / or construction activities or longer term structures at the site.</p> <p>Stress that due to the proximity of Loch Lomond particular attention should be paid to develop a site specific pollution prevention method statement before work on site. All environmental media and pathways for contaminants to pollute should be considered. It is highlighted that construction sites can generate large volumes of contaminated surface water.</p> <p>Advise that further consultation with SEPA will be required regarding any proposals affecting lochs or embankments. Should also refer to the CAR Practical Guide to determine licensing requirements under The Water Environment (Controlled Activities) (Scotland) Regulations 2005. Further discussion with SEPA is advised prior to finalising the design.</p> <p>Advise that SEPA has no record of the site being subject to flooding. However, SEPA does suggest that the development could potentially be at risk from fluvial flooding from Loch Lomond.</p>

After development of the preliminary options proposed at the initial workshop, a second options assessment workshop (18th June 2008) allowed further evaluation of these options by key project stakeholders. This was attended by LLTNPA, SEPA, HS and the project team and resulted in the development of four options to be carried through to Stage 2 Assessment. Meetings were held with LLTNPA (13th July 2009) and SEPA (22nd July 2009) to confirm and detail these final options and establish the preferred option for full scheme assessment.

## 3.2 Scoping

As part of the Scoping Study, consultations were undertaken with consultation bodies as defined by the Environmental Impact Assessment (Scotland) Regulations 1999. A summary of the responses from statutory consultees to this stage of consultation is given in Table 3.2. Non-statutory consultees and affected businesses were also consulted at this stage because of their particular interest in the scheme, and these responses are reported in Table 3.3 and 3.4 respectively. Copies of the correspondence received from those organisations consulted as part of the EIA are included as Appendix 1. Where relevant, individual chapters refer to consultations which inform the assessment but a summary of all consultations is provided below.

In some cases it was necessary to respond to queries/ comments raised through the scoping consultation. Where responses were issued these are also summarised below and provided in the relevant appendix following the scoping response.

**Table 3.2 - Consultation responses from statutory consultees (continued over)**

Consultee	Comments	Response
Argyll & Bute Council	<p>Consider that the proposed improvements should be viewed against Transport Scotland's Strategic Transport Projects Review (STPR). Project Three, A82 Targeted Road Improvements has a specific aim of significantly improving the standard of the A83 and thereby reducing accident rates, accident severity and cutting journey times.</p> <p>State that it is imperative that a Route Action Plan is prepared for the A82 to allow staged works to be undertaken and once complete the road alignment on this road is provided to an appropriate overall standard.</p> <p>Express concerns over the road alignment in relation to horizontal curvature.</p> <p>Highlight that the A82 has significant importance to the west of Scotland and in particular Argyll and Bute Councils Strategy of Economic Development.</p> <p>ABC had hoped that the A82 improvements would be of the strategic standard adopted in the section of the A82 south of Tarbet.</p> <p>In summary the main issue that has been raised, is that it is unclear how the A82 Pulpit Rock Improvement fits into the overall strategy for the A82.</p>	<p><b>How the improvements fit into the overall strategy for the A82</b></p> <p>The localised improvements at Pulpit Rock were part of a suite of measures proposed in the A82 Route Action Plan (February 2006).</p> <p>“The A82 Route Action Plan comprises a set of local improvements, which have been optimised to address existing and emerging problems along the length of the route. These improvements have been developed following an analysis of key factors such as current road characteristics, trends in road safety and prevailing operating conditions, and are supported by standard scheme appraisals and a prioritised programme of implementation”.</p> <p>(A82 Route Action Plan, Paragraph 2.1:2006)</p> <p>In addition Transport Scotland's 'Strategic Transport Projects Review' (STPR) published in 2009 identified as one of the draft investments a 'Targeted Programme of Measures to Improve Road Standards between Glasgow and Oban/Fort William (A82)'. The intervention supports the objectives to provide a significant improvement in road standard along the A82 and to reduce the accident severity rates on the route. The STPR states that the Route Action Plan forms the basis for the intervention, which has seen the Scottish Government, commit to deliver the Pulpit Rock Improvements.</p> <p><b>Standards to which the scheme is constructed</b></p> <p>The purpose of the scheme at Pulpit Rock is to allow two way traffic and permit the removal of the traffic lights. This would eliminate the delays encountered at the lights and would prevent the formation of a platoon of traffic that can occur at the lights at present. It is not a specific objective of the scheme to produce an improvement in the current road geometry and, in conjunction with Transport Scotland; Standards branch, the scheme has been developed to provide a standard of geometry appropriate to the section of road in which the scheme is located.</p>
Health and Safety Executive	No response received	No response required
Historic Scotland	<p>Advise that the HS having nothing further to add to the comments made during the Stage 2 consultation in relation to Scheduled Monuments, Listed Buildings and Historic Gardens and Designed Landscapes.</p> <p>In relation to Pulpit Rock, HS advise that there should be no ground</p>	No response required

Consultee	Comments	Response
	<p>disturbance with a 20m zone outside the scheduled area. HS recommend that temporary fencing is erected to demarcate this area during the construction works.</p> <p>HS highlight that the open space setting of the monument to the N and NE should be maintained where possible and safe public access to the rock is extremely desirable.</p>	
Loch Lomond and the Trossachs National Park Authority (LLTNPA)	<p>LLTNPA provided a detailed consultation response which addressed a number of issues including:</p> <ul style="list-style-type: none"> <li>• The Current recommended scheme</li> <li>• Cumulative Impacts</li> <li>• Policies and Plans</li> <li>• Landscape and Visual Impacts</li> <li>• Traffic Noise</li> <li>• Land Use</li> <li>• Cultural Heritage</li> <li>• Trees and Woodland</li> <li>• Impact of Loch Lomond Woods SAC</li> <li>• Native and Protected Species</li> <li>• Invasive Species</li> <li>• Pedestrians, cyclists, water users and hill walkers</li> <li>• Road Drainage and the Water Environment</li> <li>• Geology and Soils</li> <li>• Disruption due to Construction</li> <li>• Car parking and antisocial behaviour</li> </ul> <p>A full copy of this response is displayed in Appendix 1A.</p> <p>This response was followed by a meeting with the National Park Authority discuss the scope of the Environmental Impact Assessment and in particular LLTNPA aspirations for a wider cumulative assessment. The minutes of this meeting are contained in Appendix 1A.</p>	<p>Meeting held 18<sup>th</sup> March 2010 at Loch Lomond and Trossachs National Park Authority Headquarters, Balloch. In attendance were representatives from the National Park Authority, Scott Wilson and Transport Scotland.</p> <p>Issues covered at the meeting include</p> <ul style="list-style-type: none"> <li>• The EIA Scoping Response</li> <li>• Cumulative Effects</li> <li>• Landscape and Visual Effects</li> <li>• Traffic Noise</li> <li>• Land Use</li> <li>• Cultural Heritage</li> <li>• Trees and Woodland</li> <li>• Impact on Loch Lomond Woods SAC</li> <li>• Native and Protected Species</li> <li>• Invasive Species</li> <li>• Pedestrians, cyclists, water users and hill walkers</li> <li>• Road Drainage and the Water Environment</li> <li>• Disruption due to Construction</li> <li>• Strathfillan Council</li> <li>• Next Steps</li> </ul> <p><i>Since then there has been close working between Scott Wilson and the National Park Authority.</i></p>
Loch Lomond Fisheries Trust (LLFT)	<p>No comments to make. Provided a copy of their fisheries survey conducted in January 2010 (this report is included as an Appendix to the Ecology Chapter (Appendix 4F)</p>	No response required
Scottish Government – Directorate for	<p>Acknowledged receipt and informed being circulated to interested parties.</p>	No response required

Consultee	Comments	Response
the Built Environment		
Scottish Government – Climate Change and Water Industry Directorate	Highlight the provisions of Schedule 4, Part I and Part II of the Environmental Impact Assessment (Scotland) Regulations 1999. These regulations give advice on the type of information required in the preparation of an ES. In relation to the scheme, the SG do not have any relevant information to the preparation of an Environmental Statement.	No response required
Scottish Water	Advise that no Scottish Water assets will be affected by the proposed works	No response required
SEPA	Offer the following comments: <ol style="list-style-type: none"> <li>1) Construction phase - environmental impact can be minimised by best practise and implementing mitigation measures particularly in relation to works in and around Loch Lomond. The EIA should refer to PPG notes and a construction method statement should be produced with reference to monitoring proposals.</li> <li>2) CAR Authorisation should be sought prior to all works either in or adjacent to a water body.</li> <li>3) Surface Water Drainage - reference to the SUDS manual should be made and any discharge should be in accordance with the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (as amended). Seek to clarify culverting options and request that reference be made to the SEPA Regulatory Method RM08. Request information regarding the 'combined kerbing' on the bridge deck.</li> <li>4) Flood Risk - Proposed development site lies within the 1 in 200 year flood envelope of the Indicative River and Coastal Flood Map and may be at a medium to high risk of flooding. Does not take into consideration flooding arising from surface runoff, surcharged culverts or drainage systems.</li> </ol>	Further ongoing correspondence was held with SEPA over the drainage proposals for the scheme and a copy of the drainage proposals were sent for approval. (Drainage Proposals are shown in Figure 11.3)  An email was received from SEPA on the 18 <sup>th</sup> May 2010 confirming they were satisfied with the proposed works (included in Appendix 1A).  Following further refinement of the drainage proposals, further consultation was held with SEPA who replied on the 2 <sup>nd</sup> August stating they were satisfied with the amended proposals.
SNH (Argyll & Stirling area)	Welcome that the scoping report content covers topics that were addressed through the Stage 2 Assessment consultation. A summary of this response was provided: <ol style="list-style-type: none"> <li>1) Designated Sites - Confirm that no designated sites lie within the immediate vicinity of the proposals, however, do highlight</li> </ol>	No response required

Consultee	Comments	Response
	<p>the scheme lies within the National Park and National Scenic Area.</p> <p>2) Protected Species - Request adequate ecological surveys are carried out to confirm/deny presence of protected species.</p> <ul style="list-style-type: none"> <li>i) European Protected Species - likely to be relevant within the study area include bats and otters. Advise that comprehensive surveys for bat roost sites and otter holts be undertaken and mitigation measures be identified.</li> <li>ii) Fish - species including Atlantic Salmon and Lamprey are an interest feature of the nearby Endrick Water SSSI and SAC. Furthermore, several other fish species are present in the loch. SNH advise that a full fisheries study be conducted and mitigation measures be identified.</li> <li>iii) Mammals - While SNH hold no specific baseline records in the area for badger, red squirrel, wild cats and water voles, they recommend that adequate surveys are conducted to ascertain their presence in the development footprint.</li> <li>iv) Habitat Survey - recommend a Phase 1 habitat survey is conducted to assess whether the works will affect scarce habitats, and control non-native invasive species.</li> <li>v) Birds - Suggest a CBC survey is conducted between the shoreline and road as well as the woodland between the road and railway.</li> </ul> <p>3) Recommend that a LVIA is completed for structures associate with the proposal since it lies within the NSA and National Park.</p> <p>Also SNH highlight the Loch Lomond Woods Special Area of Conservation (SAC) and cumulative effects on otters, which are both an EPS and qualifying feature of the SAC. SNH note intention to carry out an AA screening to ascertain the impacts on the SAC but also request the assessment includes the cumulative impacts on otters of the Transport Scotland maintenance schemes scheduled along the A82.</p> <p>A second response was received from SNH which reiterated concerns</p>	



Consultee	Comments	Response
	<p>over the need to consider cumulative landscape impacts after recent discussions with Transerve Scotland over the Crianlarich bypass and the A82 corridor. Concerns have been developing over the last couple of years of the number of separate infrastructure projects in both the Loch Lomond and the Trossachs National Park and the 2 National Scenic Areas (Loch Lomond and the Trossachs NSAs), and the need to consider cumulative landscape impacts from all of the projects.</p>	
<p>Stirling Council</p>	<p>Highlight that while the improvement lies outwith Stirling Council's boundary, the bottleneck affects Crianlarich and Tyndrum which lie in the north of the area. Therefore, SCC support the proposals as they expect the improvements to:</p> <ul style="list-style-type: none"> <li>• Improve journey time and reliability to towns in Greater Glasgow and north of Stirling.</li> <li>• Remove traffic from the communities along the A84.</li> <li>• Improve quality of diversion routes when the A84/A85 is closed.</li> </ul> <p>However, it is stated that any construction works in which diversions may impact upon communities on the A84 and should be timed to minimise impact. Also request that impacted communities are forewarned of this disruption and traffic management be used to minimise this.</p>	<p>No response required</p>

**Table 3.3 - Consultation responses from non-statutory consultees (continued over)**

Consultee	Comments	Response
Strathfillan Community Council	<p>Scheme discussed at community council meeting on 08/02/10. Express the following concerns: Delays at Pulpit Rock are primarily caused by traffic light failure and cyclists pressing the cycle button. The Seven Sisters bend near Inveruglas causes longer delays and should be addressed first. Transport Scotland should hold consultation with residents between Tarbet and Crianlarich.</p> <p>What contingencies will be made for emergency services, residents and businesses particularly those commuting to Glasgow and Edinburgh, and if roadworks are necessary along the diversion route.</p> <p>Request that if any closures are necessary then they should be conducted outwith daylight hours. Also request that during construction these are the only works along this 20 mile stretch.</p> <p>Request details of the next stages and relevant timelines and a copy of Figure 1 from the scoping report.</p> <p>Response was also sent to Bruce Crawford MSP, Anna Maguire MP, Local Councillors and Fiona Logan (LLTNPA) to ensure views are fairly expressed.</p>	<p>In response the following was stated: It is accepted that traffic light failure and cyclists pressing the button create delays at Pulpit Rock; however, the presence of the traffic signals causes consistent delays to all traffic using the route.</p> <p>The localised improvements at Pulpit Rock were part of a suite of measures proposed in the A82 Route Action Plan (RAP) (February 2006). Long term measures to improve the A82 include the section between Tarbet and Pulpit Rock and are included in the A82 RAP. However, the purpose of this scheme is specifically to make improvements at Pulpit Rock.</p> <p>The purpose of the EIA scoping consultation is to allow those with an interest in the scheme to make comment on the scope of the ES. All comments received will be fully addressed within the ES.</p> <p>Discussion being held with the emergency services to ensure a plan is agreed which is acceptable to the local emergency service providers. The response plan will ensure that all homes and businesses are serviced through the construction period.</p> <p>The nature of the proposed works will necessitate closure of the A82 at Pulpit Rock for part of the time during the construction period. The disruption caused by the closure is an issue that will be fully assessed within the ES.</p> <p>Every effort will be made to ensure that a coordinated approach is taken with regards to any planned roadworks/maintenance schemes along the A82, A85 and the A83 during the construction period.</p>
Arrochar and Tarbet Community Council	No comments received	No response required
Buchanan Community Council	No comments received	No response required
Strathard Community Council	No comments received	No response required

Consultee	Comments	Response
Trossachs Community Council	No comments received	No response required
Balquhidder, Strathyre and Lochearnhead Community Council	<p>Express concerns on the proposed development on the A82. These relate to:</p> <ol style="list-style-type: none"> <li>1) Full road closure of the A82 between Tarbet and Criarlarich will cause greater volumes of traffic along the already busy A84 and A85 up to Criarlarich. This will have an impact on the road itself and the land surrounding it.</li> </ol> <p>Accidents occurring on the A83/A84 which result in blockage of the road during the A82 closure period will have an impact on access to the north of Scotland as two of the main arteries will be blocked.</p>	<p>In response the following was stated: The nature of the proposed works will necessitate closure of the A82 at Pulpit Rock for part of the time during the construction period. The disruption caused by the closure is an issue that will be fully assessed within the ES. In particular, this assessment will focus on the effects on the communities between Tarbet and Criarlarich. There is a commitment to programme the works outside of the tourist season, and the ES will also propose mitigation measures to alleviate as far as possible disruption during the construction period. Every effort will be made to ensure that a coordinated approach is taken with regards to any planned roadworks/ maintenance schemes along the A82, A85 and the A83 during the construction period.</p>
A82 partnership	<p>Response received from Stewart Maclean from the A82 Partnership requesting response to email included from HITRANS. Concerns were expressed by HITRANS over the limited improvement proposed. Requested further details regarding the horizontal radii, the minimum stopping sight distance and the carriageway width before a response is given.</p>	<p>In response the following was stated: The road geometry and carriageway width have been developed in consultation with Transport Scotland's standards branch. The carriageway cross section has been agreed as a nominal 6m carriageway incorporating curve widening with no hard strips. The detailed geometry is still the subject of the detailed design process, however should any departures from the DMRB standard be identified in the design these will be submitted to Transport Scotland's standards branch for consideration, as is normal practice on any trunk road scheme.</p> <p>It should be noted that the scheme being designed will allow free flowing two way traffic at Pulpit Rock meaning that the existing traffic lights and the associated delay at the lights can be removed.</p> <p><i>Response received from A82 Partnership stating would revert after detailed review of proposals – no further response received.</i></p>
Strathclyde Partnership for Transport (SPT)	<p>SPT is supportive of the proposed improvements and would welcome wider investment to this strategic road link. Offer the following comments:</p> <ol style="list-style-type: none"> <li>1) Impacts relating to the construction phase on the surrounding ecosystems and biodiversity particularly in light of the scheme location within the national park.</li> <li>2) Would welcome the following mitigation measures during design and construction:</li> </ol>	No response required

Consultee	Comments	Response
	<ul style="list-style-type: none"> <li>○ Piling should minimise vibration;</li> <li>○ Materials used should minimise the need for maintenance;</li> <li>○ Minimise risk to marine wildlife;</li> <li>○ Minimise disruption to a particular ecosystem;</li> <li>○ Monitoring throughout the scheme to ensure detrimental effects can be identified and restored;</li> <li>○ Adequate archaeological surveys should be carried out;</li> <li>○ Areas of archaeological interest should be clearly demarked;</li> <li>○ Environmental concerns relating to materials, carbon footprint and waste should be incorporated into the design;</li> </ul> <p>Noise pollution should be considered.</p>	
<p>Sustrans (Sustainable Transport Group)</p>	<p><i>No response received to scoping request by letter received 16<sup>th</sup> April 2010.</i></p> <p>Suggest that the planned upgrade of the A82 from Tarbet to Crianlarich brings the opportunity to continue the existing West Loch Lomond Cycleway north from Tarbet. This will provide a strategic long-distance route northwards which would link with the West Highland Way and with proposed cycling and walking routes heading east from Crianlarich to Killin and west to Oban. To the south, it would link from Tarbet to National Route 7 at Balloch.</p> <p>A route along the full length of west Loch Lomond and northwards would provide opportunities for circular trips by foot or bike and for creating multi-modal trips using the ferries across the loch and the train stations at Tarbet, Ardlui and Crianlarich.</p> <p>Offer following comments on proposed work at Pulpit Rock:</p> <ul style="list-style-type: none"> <li>• The works at this location form one of the first parts of the upgrade of the A82T from Tarbet to Crianlarich. As it is in the Loch Lomond and The Trossachs National Park and as the trunk road is already well used by cyclists, the plans must include improved, attractive and safe provision for cyclists along the whole length of the A82 works.</li> </ul>	<p>In response the following was stated:</p> <p>Much of the letter refers to the planned upgrade of the A82 from Tarbet to Crianlarich and aspirations for a multi-use, segregated route the full length of west Loch Lomond. The aim of the Pulpit Rock Improvement Scheme is to remove congestion at Pulpit Rock by realigning the A82 such that free flow of traffic is permitted without the use of the existing traffic signal controls. It should be noted that the improvements are not intended to increase the speed along the A82 or to increase the traffic numbers.</p> <p>The site for the proposed improvement at Pulpit Rock is particularly physically constrained, with the loch on one side and rock cuttings on the other. In addition, the proposal is influenced by the environmental sensitivities entailed with being located in both a National Scenic Area and a National Park. There has been a number of localised constraints influencing scheme design, namely, the rock outcrop to the west of the scheme and the loch foreshore to the east which supports a number of European Protected Species and is particularly important for otters, which are a qualifying feature of the Loch Lomond Special Area of Conservation</p> <p>In recognition of these constraints, the currently proposed cross section off the viaduct has been derived to match that provided on the adjacent lengths of the A82 where there is currently no edge strip. Nevertheless, in recognition of the longer</p>

Consultee	Comments	Response
	<ul style="list-style-type: none"> <li>• The cycling and walking infrastructure at the Pulpit Rock Scheme must be designed as part of a strategic approach to developing multi-use route</li> <li>• It should not be done as a 'one off' project, which may require to be redone in the future – an approach that has financial and environmental implications</li> <li>• A new high-quality path would also open up opportunities for other users, such as walkers, equestrians and disable users</li> <li>• Route must be designed to accommodate inexperienced cyclists and families with young children.</li> <li>• Upgrade of the A82 and its approach to cycling and walking provision should be progressive and an example of international</li> </ul> <p>Recommendations for the route between Tarbet and Crianlarich:</p> <ul style="list-style-type: none"> <li>• 2 – 2.5 metre wide segregated multi-use path on the loch side (east) of the A82.</li> <li>• As the road will be upgraded in sections, it will also be necessary (at least until the whole route is complete) to provide a one metre-wide (minimum) sealed surface strip along the west side of the A82 to avoid cyclists heading north being forced to either cross the trunk road twice to join and leave short sections of cycle track or to cycle in the main carriageway.</li> <li>• A proper maintenance regime must be agreed for the multi-use route to ensure that it remains attractive and well-used. Suggest route is within trunk road corridor throughout as it is then clear that maintenance is the responsibility of Transport Scotland and its agents. While this means that the trunk road corridor may have to wider, it will mean that the environmental impact is contained.</li> </ul> <p>In addition, there are several other schemes in progress or planned along the A82. There are:</p> <ul style="list-style-type: none"> <li>• Crianlarich by-pass</li> <li>• Stuckendroin bridge widening scheme</li> <li>• Inverarnan</li> </ul> <p>Sustrans would very much like to see what provision is proposed for non-motorised users at these sites to ensure that the plans are consistent with a strategic approach. A cumulative EIA is required to cover all schemes – they should not be considered in isolation.</p>	<p>term aspiration to upgrade this length of the A82, a 2m wide verge is being proposed on the loch side of the viaduct as a means of 'future proofing' in the event that cycle provision should be incorporated along this length of the A82 at some later date. On this basis, the proposed cross section improvement for this location on the A82 has been discussed, reviewed and approved by Transport Scotland's Standards Branch.</p> <p>Your recommendations for the route between Tarbet and Crianlarich are appreciated but regret that a consideration of the whole length of the A82 is beyond the scope of this particular improvement scheme which, as stated earlier, is intended to remove congestion at Pulpit Rock.</p> <p>Your suggestion for a 2-2.5m wide segregated multi-use path on the loch side (east) of the A82 is achieved by the current proposals which includes a 2m verge to allow future non-motorised user provision on the loch-side of the proposed viaduct. However, it should be stressed that it is considered that this provision will only be utilised should the adjoining sections of the A82 be upgraded to include non-motorised provision and until such time signage to that effect will not be provided.</p> <p>For information the EIA for the Pulpit Rock Improvements will include a cumulative impact assessment addressing other potential schemes along the A82 and in the wider area.</p>

Consultee	Comments	Response
	In conclusion, the Scottish Government stresses the importance of active travel and it is our view that failure to provide a continuous walking and cycling alternative to the A82T would be at odds with government policy.	
First ScotRail	No comments received	No response required
HITRANS	<p>HITRANS requested information on wider consultation on options considered at Stage 2.</p> <p>HITRANS further requested information regarding the minimum horizontal radius and stopping sight distance.</p> <p>Subsequently following the meeting with Transport Scotland - HITRANS requested the geotechnical site investigation and interpretation reports.</p> <p>A further email was received from HITRANS (30<sup>th</sup> April 2010) which proposed an amended scheme alignment ('proposed lay-by option) and included a drawing illustrating the amended proposal.</p>	<p>A meeting was held with Transport Scotland and HITRANS to discuss the options selection and also the scheme design.</p> <p>SW agreed to provide copy of Geotechnical Site Investigation reports once finalised.</p> <p>Concurrent to SW receiving the amended proposal, LLTNPA also received the same proposal from SPT which they were asked to provide comment on. The response from LLTNPA stated that ' [the] revision would be likely to have more significant adverse landscape and visual impacts, encroaches further into the loch edge, would involve further woodland removal, and raises questions about who would manage the litter, informal camping and antisocial behaviour that would result from the inclusion of a lay-by'. In summary the LLTNPA do not support the proposed amendment and copied their response to SW.</p> <p>SW therefore responded to HITRANS providing a copy of the LLTNPA response to the SPT proposal and stated that SW could not consider the proposed amendment any further given that the LLTNPA did not support it.</p>
Network Rail	No comments received	No response required
Scottish Citylink Buses	No comments received	No response required
Transerve	No comments received	No response required
Architecture and Design Scotland	No comments received	No response required
BTO Scotland	Not able to comment on the development proposals as they were sent unsolicited.	No response required

Consultee	Comments	Response
CTC Scotland (Glasgow District Association)	<p>Stretch of road is popular with cyclists since there is no alternative north-south route. There is segregated cycle track further south and it is assumed this will be extended northwards. Request that the proposals should incorporate a cycle facility here, preferably a 1.5m strip in both directions.</p> <p>Express concern at an intrusive element in a sensitive area. Query whether journey times will be improved or if more people may use the route once the scheme is completed. Increase in traffic is a deterrent for cyclists. Suggest a congestion charge to encourage use of railway. ES should incorporate realistic operational traffic levels including purely touristic levels. Effects of extra traffic should be considered in terms of carbon emissions.</p> <p>Further correspondence requested information on cycleway/footpath along length of scheme and also provision of hard strips</p>	<p>In response the following was stated: In response to the specific issues of cycling provision through the scheme, although the A82 Pulpit Rock Improvement Scheme corridor is currently “cycleable” along its duration, there is no specific provision for cyclists e.g. on-road cycle lanes or adjacent off-road cycle paths. Cyclists therefore have to share the single carriageway with motorised vehicular traffic. Along the A82 between Taret (where the West Loch Lomond Cycle Path from Balloch ends) and Crianlarich, there is no formal off-road cycleway or “quieter” on-road cycling alternatives to take cyclists off the A82. The scheme design provides a 2m footpath/cycleway on the loch-side of the proposed viaduct.</p> <p>The site for the proposed improvement at Pulpit Rock is particularly physically constrained, with the loch on one side and rock cuttings on the other. In addition, the proposal is influenced by the environmental sensitivities entailed with being located in both a National Scenic Area and a National Park. There has been a number of localised constraints influencing scheme design, namely, the rock outcrop to the west of the scheme and the loch foreshore to the east which supports a number of European Protected Species and is particularly important for otters, which are a qualifying feature of the Loch Lomond Special Area of Conservation.</p> <p>In recognition of these constraints, the currently proposed cross section off the viaduct has been derived to match that provided on the adjacent lengths of the A82 where there is currently no edge strip. Nevertheless, in recognition of the longer term aspiration to upgrade this length of the A82, a 2m wide verge is being proposed on the loch side of the viaduct as a means of 'future proofing' in the event that cycle provision should be incorporated along this length of the A82 at some later date. On this basis, the proposed cross section improvement for this location on the A82 has been discussed, reviewed and approved by Transport Scotland's Standard Branch.</p>
Deer Commission Scotland	DCS does not feel that the magnitude of the proposals warrants further consideration.	No response required
Forestry Commission	No comments received	No response required
Friends of Loch Lomond & The Trossachs	No comments received	No response required
LBAP officer	No comments received	No response required

Consultee	Comments	Response
Loch Lomond Angling Improvement Association	No comments received	No response required
Loch Lomond Association	No comments received	No response required
Loch Lomond Bat Group	No comments received	No response required
Loch Lomond Rescue Boat	No comments received	No response required
Loch Lomond Tourist Board	No comments received	No response required
Lomond and Forth Valley LEADER	No comments received	No response required
National Trust for Scotland	No comments received	No response required
Ramblers Association Scotland	No comments received	No response required
RCAHMS	No comments received	No response required
RSPB	No comments received	No response required
Scottish Badgers	Advise that a badger survey is carried out to confirm the absence of badgers from the target area. If they are present then a mitigation plan should be drawn up to reduce the impacts on badger populations.	No response required
Scottish Countryside Rangers Association (SCRA)	No comments received	No response required
Scottish Enterprise	Scottish Enterprise welcomes the proposals by Transport Scotland for an improvements scheme on the A82 Pulpit Rock between Tarbet and Crianlarich. It will assist the economy of the area by allowing improved	No response required



Consultee	Comments	Response
	travel fro businesses making the route more attractive to tourists. Whilst any scheme at this location, by the very nature of the geography, will require some level do man-made intervention, the proposed scheme will hopefully do this as sensitively as possible and has the potential to open up views up and down the loch in this location.	
Scottish Rights of Way & Access Society (Scotways)	No rights of way other than those present along any road are within the area of the proposals.	No response required
Scottish Ornithologists Club	No comments received	No response required
Scottish Wildlife Trust	No comments received	No response required
VisitScotland (West Central Scotland local office)	No comments received	No response required
West of Scotland Archaeology Service (WOSAS)	WOSAS reiterate previous comments made at the Stage 2 Assessment. Concern is expressed due to the proximity of the Pulpit Rock SM and Tarbet to Crianlarich Military Road. WOSAS also identify the potential for crannogs to be present under the Loch surface.	No response required
West Highland Way	No comments received	No response required
Bruce Crawford MSP	No comments received	No response required
Jackie Baillie MSP	No comments received	No response required
Scottish Ambulance Service	No comments received	No response required
Strathclyde Fire & Rescue	Express concerns relating to the maintenance of access for emergency vehicles travelling in both directions during the scheduled work.	In response the following was stated: With regards to maintenance of access for emergency vehicles no firm plan is in

Consultee	Comments	Response
	Requested copy of Scoping Report.	place at the moment but a strategy will be developed in consultation with emergency services and the Local Authorities. Meeting held with Strathclyde Fire & Rescue, 15/06/10, to discuss initial concerns. Refer to A82 Full Road Closure – Assessment Report provided in Appendix 5.
Strathclyde Police	No comments received	No response required
British Horse Society (Scotland)	Except in extreme circumstances horse riders and carriage drivers will rarely use this road. Support the improvements – as anything improving the experience of transporting equines by road (by making the ride smoother) is appreciated and quite a few horses and ponies will travel this road in lorries and trailers.	No response required
Lochs and Glens Holidays	No comments received	No response required
Anne McGuire MP	No comments received	No response required
Alan Reid MP	No comments received	No response required
Rt Hon John McFall MP <sup>1</sup>	No comments received	No response required
HM Coastguard	No comments received	No response required
Central Scotland Fire & Rescue Service HQ	No comments received	No response required

<sup>1</sup> Consultation conducted prior to the 2010 General Election where John McFall was replaced as MP for Dumbartonshire West by Gemma Doyle.

**Table 3.4 - Consultation responses from affected businesses (continued over)**

Consultee	Comments	
Cruise Loch Lomond	Welcome the proposals but express concerns at the level of disruption that will take place along the A82. The coaching market represents a high proportion of their trade.	No response required
Tarbet Hotel	No comments received	No response required
Arrochar Primary school	No comments received	No response required
Loch View B&B	No comments received	No response required
Bonnie Brae's Restuarant	No comments received	No response required
Stewart House B&B	No comments received	No response required
Blairannaich	No comments received	No response required
Ballyhennan Restaurant & Bar	No comments received	No response required
Innischonain House	No comments received	No response required
Aye Servus Bed & Breakfast	No comments received	No response required
Tarbet House B&B	No comments received	No response required
Loch Lomond Holiday Park	No comments received	No response required
Inveruglas Visitor Centre	No comments received	No response required
Sloy Power Station	No comments received	No response required
Ardvorlich House B&B	No comments received	No response required
Ardlui Hotel, Marina and	Welcome the proposals at Pulpit Rock. However, do express concerns relating to disruption to A82 particularly in terms of a	In response the following was stated: In response to the issue of disruption to local communities, the nature of the

Consultee	Comments	
Holiday Home Park	reduction in tourism along the route. Would like assurances that traffic flow will be maintained.	proposed works will necessitate closure of the A82 at Pulpit Rock for part of the time during the construction period. The disruption caused by the closure is an issue that will be fully assessed within the ES. In particular, this assessment will focus on the effects on the communities between Tarbet and Crianlarich. There is a commitment to programme the works outside of the tourist season, and the ES will also propose mitigation measures to alleviate as far as possible disruption during the construction period.
McGreggors Landing (Now Loch Lomond Outdoor Education Centre)	No comments received Attempts were made to telephone Loch Lomond Outdoor Education Centre and messages were left March 2010.	No response required
Drovers and Drovers Lodge	Highlight that a number of accidents occur along this route but not at Pulpit Rock and these accident black spots should be given investment priority. Express concern at the level of disruption the works will cause on road users in particularly tourism.  Do not anticipate the viaduct will impact upon the beauty of Loch Lomond - cite Loch Awe viaduct as an example where the visual impact has been limited.	In response the following was stated:  In response to specific issues raised, the improvements at Pulpit Rock were originally proposed as one of a number of road improvements along the A82, through the A82 Route Action Plan produced by Transport Scotland in 2006. While it is acknowledged that improvements may be needed at other locations, this scheme was nonetheless still identified as a major priority requiring a detailed feasibility study.  The nature of the proposed works will necessitate closure of the A82 at Pulpit Rock for part of the time during the construction period. The disruption caused by the closure is an issue that will be fully assessed within the ES. In particular, this assessment will focus on the effects on the communities between Tarbet and Crianlarich. There is a commitment to programme the works outside of the tourist season, and the ES will also propose mitigation measures to alleviate as far as possible disruption during the construction period.
Rose Cottage B&B	No comments received	No response required
Beinglas Farm Campsite	No comments received	No response required
Crianlarich Primary School	No comments received	No response required

Consultee	Comments	
Crianlarich Youth Hostel	No comments received	No response required
Portnelcan Highland Lodges	No comments received	No response required
Northumbria B&B	No comments received	No response required
Station Tearoom	No comments received	No response required
Ben-more Lodge Hotel	No comments received	No response required
Glenbruar House	No comments received	No response required
Crianlarich Store	<p>Supports the proposals to upgrade this section. However, express a number of concerns relating to the localised disruption during the construction phase. These include:</p> <ol style="list-style-type: none"> <li>1) Will road closures along the A82 be required?</li> <li>2) What efforts are being made to reduce these closures?</li> <li>3) What alternative arrangements will be made for the local communities?</li> <li>4) How can the large carbon footprint resulting from route diversion be justified?</li> <li>5) There will be direct financial impacts upon local business in terms of deliveries from Greater Glasgow. What arrangements will be put in place to minimise these.</li> <li>6) Will road closures be out with the main tourist season?</li> <li>7) There will be severe economic impact on the whole of the West of Scotland through the loss of tourism traffic.</li> <li>8) What arrangements will be made for the emergency services?</li> <li>9) What arrangements will be made for unexpected road closures along the route diversion?</li> <li>10) How will the diversion be managed at a more strategic level in terms of sign posting?</li> <li>11) Will other maintenance schemes will require closure of the A82 at the same time as this scheme.</li> </ol> <p>Request that the ES addresses these questions.</p>	<p>In response the following was stated: The nature of the proposed works will necessitate closure of the A82 at Pulpit Rock for part of the time during the construction period. The disruption caused by the closure is an issue that will be fully assessed within the ES. In particular, this assessment will focus on the effects on the communities between Tarbet and Crianlarich. There is a commitment to programme the works outside of the tourist season, and the ES will also propose mitigation measures to alleviate as far as possible disruption during the construction period. We are unfortunately not in a position to provide you with any level of detail at the moment until the scheme design is fully finalised and therefore details concerning the construction period are developed.</p> <p>We are in discussion to ensure a plan is agreed which is acceptable to the local emergency service providers. The response plan will ensure that all homes and businesses are serviced through the construction period.</p> <p>Every effort will be made to ensure that a coordinated approach is taken with regards to any planned roadworks/ maintenance schemes along the A82, A85 and the A83 during the construction period.</p>
Rod and Reel Pub	No comments received	No response required

Consultee	Comments	
Glenardran Hotel	No comments received	No response required
Hermitage Academy, Helensburgh	No comments received	No response required
Inversnaid Hotel	No comments received	No response required
Clisham Cottage B&B	Response was directed through response from Strathfillan Community Council.	

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### 3.3 Summary of Key Issues

A number of key issues arose from the consultation detailed above, these included:

- The proximity of Pulpit Rock Scheduled Monument;
- The location of the scheme within a National Park and National Scenic Area and the associated landscape and visual impacts as a result of the scheme;
- Potential disturbance to European Protected Species including otter during construction works;
- Potential pollution to Loch Lomond both during construction and operation;
- Rather than considering this project in isolation there would be more benefit in a strategic improvement to the whole A82;
- There are other accident hotspots and bottlenecks along the A82 between Tarbet and Crianlarich where improvements should take priority;
- During the construction period there will be major disruption to the area which will include the temporary severance of routes used by the emergency services and local residents and businesses;
- Route severance along the A82 at Pulpit Rock will have implications on tourism at a local and regional level;
- The proposed route diversion will increase journey times and could potentially also suffer from disruption due to localised landslides which are a feature of this route.