

Appendix 1a Statutory Consultation Responses

Argyll and Bute Council

Operational Services

Director: Andrew R. Law

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Operational Services

Roads and Amenity Services

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Ask For: Stewart Turner

Our Ref: R/RDS/6

Your Ref: S100785/e01

Date: 26 February 2010

Dear Ms McClelland

A82 PULPIT ROCK IMPROVEMENT CONSULTATION

I refer to your letter of 25 January 2010 seeking comments on the proposed improvements at Pulpit Rock located on the A82 between Tarbet and Crianlarich.

I note that the proposed works would appear to be focused on a localised improvement rather than considering the A82 as a strategic route serving West Highland Scotland. You are correct in what you say that much of the carriageway between Tarbet and Ardlui is torturous with many tight horizontal curves and with narrow carriageway width. Even to the north of Ardlui the A82 as it heads through Glen Coe and beyond Fort William has a varying standard with a carriageway widths of much less than 7.3 metres. What can be seen though is that there have been significant improvements undertaken on the A82 from Stonymollan Roundabout north towards Arrochar to an extent that this road over a 20 mile section has been improved to a reasonable standard.

I consider that the improvements for the specific location of Pulpit Rock must be viewed against Transport Scotland's Strategic Transport Projects Review (STPR) which proposed 29 major packages of work across Scotland to meet improving transport links between our various areas. The STPR is split into three major sections dealing with: -

1. Maintaining and safely operating existing assets
2. Making better use of existing capacity
3. Targeted infrastructure improvements

Project Three, A82 Targeted Road Improvements has a specific aim of significantly improving the standard of the A82 and thereby reducing accident rates, accident severity and cutting journey times. The STPR goes on to add that in general terms an upgrade to the route is required with appropriate measures including road widening at



selected locations between Tarbet and Inverarnan and also in the Corran Ferry / Fort William areas. It is recognised that the cost estimates for these works of between £100 and £250m is of significant value that it may not be possible to deliver all the schemes against the current economic background.

On the basis that the target for the STPR is to significantly improve the standard of the A82, then this aim must be viewed against the proposal for the works at Pulpit Rock. It is considered that the improvements at Pulpit Rock have not been appropriately incorporated in a route action plan for the A82. 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. The concern of dealing with Pulpit Rock in isolation is that although 400 metres of road works is a welcomed improvement the standard to which this is being constructed is not appropriate.

Highway Link Design in the Design Manual for Road and Bridges provides detail on horizontal curvature requirements for new road alignments. From the limited information available (Fig 2 of the Environmental Impact Assessment Scoping Report) I have established that the three radii for the horizontal curvature on this improvement will be between 50 and 120 metres. On viewing Table 3 of Highway Link Design it is clear that the horizontal curvature proposed for the Pulpit Rock Improvements is "Four steps below the desirable minimum radius" for a design speed of 50kph. I have concerns that this section of road is being designed to the lowest available design speed.

I recognise that it is permissible from Chapter 3 of Highway Link Design that relaxations in design speed can be made by the designer to a maximum of four steps below. It is also indicated within the scoping report that carriageway widening will be provided but due to the radii being provided being less than 90 metres then widening will be in accordance with TA20. It would appear from this that a carriageway width of approximately 9 metres will be provided.

Taking into account the expected high cost of such a scheme including a viaduct over approximately 200 metres of the alignment and a rock cut to the north it could be argued that the improvement in the alignment is not significant enough and strategic enough to afford a reasonable improvement.

The A82 has significant importance to the west of Scotland in delivering the government's economic strategy and in particular Argyll & Bute Council's Strategy on Economic Development perspective of renewable, tourism and food & drink. It is important that the route improvements on the A82 meet these requirements. There has been limited discussion to date on the actual design criteria being adopted for the A82 and I would argue that the proposed alignment for Pulpit Rock falls somewhat short of a strategic alignment for a road such as the A82.

Of course it is important that the traffic lights at Pulpit Rock are removed. On the basis that we are now proceeding towards an Environmental Impact Assessment Scoping Report and that significant alignment work has been undertaken, then Transport Scotland should be applauded for taking this matter forward. However from an Argyll & Bute Council perspective it is a fact that this location would appear to be being treated in isolation and also the standard of works proposed within the design, has not been provided to a strategic level. The south section of the A82 which has been constructed to a 7.3metres carriageway with 1metre hard strips has functioned very well as part of the strategic network. The rest of the A82 and in particular between Tarbet and Ardlui has poor horizontal alignment and from an engineering and Council perspective it was hoped that the proposals for improvements on the A82 in this location would be carried out in a similar manner to the works located to the south.

In summary the main issue that has been raised, is that is unclear how the A82 Pulpit Rock improvement fits into the overall strategy for the A82.

Yours sincerely



Stewart Turner
Head of Roads & Amenity Services



Stewart Turner
Head of Roads and Amenity Services
Argyll and Bute Council
Kilmory
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PA31 8RT

Our Ref: S100785/e01/2
Your Ref:
Date: 30/03/10

Dear Mr Turner,

A82 Pulpit Rock Improvement Consultation

Many thanks for your letter dated 26th February 2010 relating to the Environmental Impact Assessment Scott Wilson are conducting for the improvements to the A82 at Pulpit Rock. Your comments will be used to inform the detailed design of the scheme to ensure all environmental concerns are integrated into the design process where possible and will be reported in an Environmental Statement (ES). Once completed the ES will be published alongside draft Road Orders and Compulsory Purchase Orders for the scheme as required under the Roads (Scotland) Act 1984.

On publication of the draft Orders, Compulsory Purchase Orders and the Environmental Statement, Transport Scotland will host a public exhibition detailing the scheme proposals, the environmental impacts and any mitigation measures proposed to minimise these effects. There is a statutory period of 6 weeks following publication of the Draft Orders and the ES during which time you are entitled to comment on the scheme. However, the following addresses specific issues that you raised in your response.

How the improvements fit into the overall strategy for the A82

The localised improvements at Pulpit Rock were part of a suite of measures proposed in the A82 Route Action Plan (February 2006).

“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”.

(A82 Route Action Plan, Paragraph 2.1:2006)

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.

Standards to which the scheme is constructed

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.T.O.

Again thank you for taking the time to respond to our request for consultation. On publication of the Draft Road Orders, Compulsory Purchase Orders and the Environmental Statement as stated above a public exhibition will be held. The exhibition will be widely publicised in the local press, the community councils and will also be advertised locally.

Yours sincerely

Zoë McClelland

Historic Scotland

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Our ref: AMN/3/69
CMS Ref: 200903019
Your Ref: S100785/e07

Date: 22 February 2010

Dear Ms McClelland

A82 Pulpit Rock Improvement Consultation

Thank you for your letter of 25 January 2010 seeking Historic Scotland's comments on the current recommended scheme as set out in the attached scoping report and any information we hold which may be relevant. This letter contains our comments for our historic environment remit at the national level. That is scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes included in the Inventory. I note that you have already sought advice on unscheduled archaeology from the West of Scotland Archaeology Service.

On the basis of the information supplied, I have nothing further to add to the information provided in our response to a request for information dated 22 March 2007 (copy attached) at this stage. In particular the information supplied under the headings 'protection of the monument' and 'amenity and setting of the monument'.

In terms of the scoping report itself, I welcome the statement included in para 9.4.1 that any impacts of the proposed scheme will be assessed according to the criteria set out in the Design Manual for Roads and Bridges (DMRB).

Please do not hesitate to contact me if you wish to discuss any of the issues raised.

Yours sincerely



Adele Shaw
Environmental Impact Assessment Team Leader

CC Rhona Reid SG-DD



INVESTOR IN PEOPLE





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Your ref: S100785/PSS/tpm
22 March 2007

Dear Mr McLoughlin

**A82 PULPIT ROCK IMPROVEMENTS
HISTORIC ENVIRONMENT ISSUES**

Thank you for your letter of 27 February 2007 and the opportunity to comment on the proposed road improvements to the A82 between Tarbet and Crianlarich. Our comments concentrate on Historic Scotland's statutory remit at the national level for:

- scheduled monuments
- listed buildings
- historic gardens and designed landscapes.

Whilst much of the advice offered will also be of general relevance for historic environment resources of regional or local importance, you must seek detailed information and advice on those issues from the relevant Council Archaeological Service. The contact point in this case is Dr Carol Swanson, Manager, West of Scotland Archaeology Service, 20 India Street, Glasgow G2 4PF. There may be a fee applicable for a service of this nature of which the archaeology service will be able to advise you in advance.

Firstly we would point out that there is one scheduled monument close to the proposed road improvements:

- Pulpit Rock, preaching site, south of Ardlui (index no. 10972) [NGR NN 324 136]

Your letter mentions a second scheduled monument at NN 3262 1362. This is likely to be the National Monuments Record for Scotland's entry for the same site.

For historical maps and photographs of the site we suggest you contact the Royal Commission on the Ancient and Historical Monuments of Scotland (www.rcahms.gov.uk).

Protection of the monument

There should be no ground disturbance within the scheduled area and, if possible, within a 20m zone outside the scheduled area. I attach a copy of the monument schedule which shows the extent of the scheduled area.

In order to secure this safe zone, consideration should be given to fencing or taping off the area before the start of ground investigations and throughout any site works which follow. A suitable approach might be to provide a light but clearly visible demarcation line around all sides except the SW, where butting the fence / tape line against the existing fence at the foot of the railway embankment should serve. The temporary fencing or tape should be erected outside the scheduled area and should be removed at the conclusion of site works.

Amenity and setting of the monument

The monument was sited here because of the natural rock topography and because there is an open slope with wide views, which would have given warning of approach from any direction. Ease of access along the loch shore and by water would also have been significant. The construction of the railway line embankment in the nineteenth century has compromised the landward setting, but the relatively open aspect towards the N and NE is still evident, although there are trees which restrict views at present.

In considering design/engineering solutions, retention of a similar (or greater) degree of open aspect to the N and NE and the retention (or alternative provision) of safe public access should be treated as extremely desirable objectives.

Yours sincerely

MIRIAM McIVER

Loch Lomond and the Trossachs National Park Authority (LLTNPA)

E04

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Zöe McClelland
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03/03/2010

Your ref: S100785/e04

Dear Zöe,

A82 Pulpit Rock Improvement Consultation

I write in response to your letter of 25 January 2010, asking for feedback on the EIA Scoping Report, dated January 2010.

This letter sets out our response to the scoping report. It identifies issues we would like to see included in the Environmental Statement, and includes a list of land use or planning proposals that will need to be considered in the assessment of cumulative impacts.

The current recommended scheme

Your cover letter asks us to identify any concerns we have with the current recommended scheme (the shortened viaduct option).

Although Table 1 on page 4 of the Scoping Report contains a summary of the options and the conclusions of the Stage 2 assessment, we have not received a copy of the full Stage 2 Assessment Report and we understand this document is not yet available.

Until such time as the Stage 2 Assessment Report is available, we cannot give our views on the current recommended scheme.

In any case, the ES should contain an assessment of the main alternatives, taking into account the environmental effects of each, and explain why Transport Scotland has opted for the shortened viaduct option. We are particularly interested in the tunnel option, as Table 1 on page 4 of the Scoping Report indicates the tunnel option would have a lower environmental impact than the preferred option. It is very disappointing to be asked for views on the preferred option in the absence of any analysis of the alternatives on which to base such comments.

Issues for inclusion in the Environmental Statement

Cumulative impacts

The lack of co-ordination between road improvement projects along the route makes it very difficult for us to properly consider and advise on cumulative impacts in this area. This is a fundamental concern of the NPA and an issue that is currently being pressed at a senior level

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within Transport Scotland.

We therefore want to emphasise the importance of the consideration of cumulative impacts in the ES. With respect to Section 16 of the Scoping Report, we agree the cumulative impact assessment should cover the area from Tarbet to Crianlarich (Section 16.1.3), and include all proposed upgrades of the A82 in this area.

All the issues listed in 16.2.6 need to be considered in relation to cumulative impact. We would wish to see boat users added to this list, as Loch Lomond is nationally important for recreational boating and there is a marina nearby at Ardlui. Archaeology also needs to be considered.

The following projects we know of and should be taken into consideration in the assessment of cumulative impacts:

- A82 widening and re-alignment Tarbet to Crianlarich including Stuckendroin Bridge widening and road-straightening, full reconstruction and partial realignment south of Inverarnan, Crianlarich bypass and re-alignment of West Highland Way spur.
- Sloy Power Station, construction of pumping station, and removal of area of woodland.
- Glen Falloch hydro scheme with associated pump houses and connections to the national grid by overhead lines.
- Scottish and Southern Energy – new transformer, overhead lines and access tracks
- Cononish proposed gold mine operation including car park, access track upgrade and associated processing plant
- Rossdhu Golf Course.

Relevant policies and plans

The Scoping Report identifies a number of relevant documents for the National Park Authority (NPA). Below is a list of those in the process of being reviewed, updated or finalised, and their current status:

- Finalised Draft Local Plan (February 2010)
- The Loch Lomond & Trossachs National Park Plan 2007-2012, mid term review due to be published Spring 2010.
- Core path plan (due to be adopted Spring 2010)
- Scottish Natural Heritage Landscape Character Assessment Loch Lomond & Trossachs National Park – published 2009
- Scottish Natural Heritage – Special landscape qualities of The Loch Lomond & Trossachs National Park – report due to be published in 2010.

Owing to the timescale of the project plan and delivery, we recommend you remain in contact with the NPA regarding the status of these documents.

Landscape and visual impacts

The methodology proposed in section 5.4.2 would appear to be appropriate.

The landscape and visual impact assessment for this specific proposal should take into account

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cumulative impacts, as outlined above.

Landscape character

Section 5.1.3 of the Scoping Report identifies the landscape character as 'highland landscapes'. The 2009 LCA for the Park sub categorises these highland landscapes as 'glen sides'. Please refer to pages 94 -101 of the new LCA for more information. This is available for download at: <http://www.snh.org.uk/pubs>.

A draft of the report 'The special landscape qualities of LLTNP' (due to be published by SNH in 2010) is also available from the NPA on request.

Zone of visual influence

Section 5.1.6 of the Scoping Report highlights the importance of this area with regards to landscape, and visitor experience. The seasonal variation in the level of road traffic use demonstrates that leisure and tourism journeys account for the majority of journeys at peak times. Whether visiting the national park or simply journeying through the area, the iconic views from the A82 contribute to the visitor experience of the park. The road itself is a nationally important tourist route and a key viewpoint of the National Scenic Area and the wider National Park.

We support the proposal to accurately map a zone of visual influence for the project and to note on this map cumulative zone(s) of visual influence.

We recommend that once a map of visual influence has been developed, that specific receptors/viewpoints are then agreed with the park and other consultees prior to further works being undertaken.

Potential receptors:

- Visual impact from the loch including passengers on the summer ferry from Ardlui, and day trippers going south from the marina at Ardlui and passing Pulpit Rock. Over what area can the engineering works be seen and how long can this be viewed (i.e. by a boat observing the speed limit in this area and by passengers on the ferry)?
- Visual impact and landscape experience of walkers on the West Highland Way, e.g. Doune Bothy area. Over what area can the engineering works be seen and how long can this be viewed (i.e. by a person walking at a reasonable pace)?
- Visual impact and landscape experience of hill walkers accessing the summits of Stob nan Eighrach and Beinn a Choin (a Corbett). Over what area can the engineering works be seen and how long can this be viewed (i.e. by a person walking at a reasonable pace)?
- Visual impact and landscape experience of users of the A82 itself either on foot, bike or in a motorised vehicle. Over what area can the engineering works be seen and how long can this be viewed (i.e. by a driver observing the speed limit)? We strongly support the development of a 'drive-through' to note the changing landscape experience from the journey along the A82 in 2009, to that following all the proposed upgrades from Tarbet to Crianlarich. The changes to landscape experience should also reflect the likely change in speed of traffic on the A82 following the upgrades as this will affect landscape experience.
- Visual impact and landscape experience of those travelling by train, this may be both positive and negative as some views may be opened up as an indirect result of the road re-alignment projects.

It is very important that for all of the receptors and the zone of visual influence, you consider cumulative impacts. Of particular note would be the experience of those using the A82 itself and

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those walking the West Highland Way, as they are likely to be most significantly affected.

Detailed information on design and mitigation

Some of the key areas of detail that should be included in the ES to assess landscape impact are as follows. Note, this is not an exhaustive list:

- Lighting details during construction and/or operation, i.e. type of lighting, frequency of lighting, location etc.
- The Loch Lomond area is currently being examined for its value as a "Dark Skies" resource. The impacts of new lighting on this resource need to be considered.
- Signage and other associated road carriage furniture, the A82 currently has the character of a 'rural road' and increasing the amount of carriageway furniture will change the character of the road and the immediate landscape. The type and location of furniture should be detailed.
- The relationship of the engineered structure to its surroundings in a variety of conditions e.g. grey weather, bright light with light reflecting off the loch, at low and high water etc
- Detailed description of road infrastructure, number and location of columns, colour and treatment of columns (at installation and with weathering), carriageway surfacing, verge treatment, drain installation height, type and treatment of road edge protection etc.
- Area of loch-side clearance and treatment of the banks during the operation and re-instatement phase. Long term management of vegetation on the loch-side.
- Extent of the rock cutting, degree of batter, treatment of slopes (short term to mitigate landscape impact and long term management of wall stability and vegetation management).
- A detailed local landscape character and visual assessment which breaks the existing route into sections and then informs the proposed landscape design and planting mitigation.

Traffic noise

Traffic noise is a factor in how visitors and communities relate to and experience landscape. As such, when assessing changes to landscape experience at key receptors (as outlined above), the implications of an increase or decrease in traffic noise, both during the construction and operational phases of the development, should be considered as part of the ES.

Land use

It is likely that small areas of land that are currently used for grazing may be lost or may become unviable with the re-alignment of the road. The ES should highlight these areas and note what impact this will have on the relevant rural businesses. It should also note the indirect landscape changes this will create, the potential loss of a mosaic of pasture and woodland and the development of scrub woodland and the impacts on views into and out of the A82 corridor. The cumulative impact of the loss of potential grazing or in by land should also be noted as this type of land is relatively scarce on the glen sides. The ES should identify those areas temporarily lost during the construction phase and those permanently lost to the road re-alignment.

Cultural heritage

Pulpit rock is a former preaching site and scheduled monument. The ES should demonstrate:

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- The extent of archaeological interest in the site, including the potential for the disturbance of loch-side Crannogs.
- How this area will be protected, particularly during the construction phase.
- How the landscape setting of this site and the former military road will be affected by the development.
- How pedestrian and vehicle access to the scheduled monument will be facilitated safely and whether there are opportunities to improve the setting of the site and interpret it for public benefit.

Trees and woodland

The ES should map and identify the scale of the following:

- The number of individual mature and veteran trees, which are significant as individual trees in a landscape or biodiversity context, which need to be removed at Pulpit Rock either during the build or operation phase.
- An estimate of the number of mature or specimen trees removed along the entire length of the route as a result of the various proposals outlined above that need to be considered in the assessment of cumulative impact (e.g. the 68 trees removed for Stuckendroin bridge).
- The number, location and type of blocks of trees that need to be removed either during the build or operation phase of this development. The ES should consider fragmentation of the habitat network along West Loch Lomond. What, if any, gaps are created by this proposal?
- An estimate of the number and type of woodland blocks along the entire route that will be removed, for the consideration of cumulative impact. An assessment of the impact of this removal in terms of biodiversity, habitat fragmentation and landscape.
- Options for replanting. This should include possible locations and species which are biologically appropriate to the area, in keeping with the landscape character of the area and suitable for changing climatic conditions.

Impacts on Loch Lomond Woods SAC

Section 10.1.4 of the Scoping Report risks giving too little attention to the potential impacts on the Loch Lomond Woods SAC in the ES. Whilst the losses from the Pulpit Rock section may be small as stated in the Scoping Report, the cumulative impact of all the schemes still needs to be considered. The SAC consists of a number of woodland SSSIs on the west and east shores and to the north of Loch Lomond. These stands represent the largest and highest quality areas of semi-natural woodland in the area. However, their ecological value is significantly increased by the many intervening pockets of semi-natural woodland that connect them into a largely intact woodland habitat network. The woodland, scrub and specimen trees along the A82 from Tarbet to Ardlui all contribute to this network, and much of it is both ancient woodland and Natura qualifying habitat. In practice, all of the semi natural woodland around the loch contributes ecologically to the SAC.

- Impacts from both cumulative loss and the cumulative potential for fragmentation of the woodland need to be considered and evaluated in the ES in the context of the SAC even where they fall outwith the statutorily designed sites.

Native and protected species

From the Scoping Report, it appears that the lower plants, including epiphytes on tree trunks and rock outcrops, have not been surveyed for. In an email to Fraser Maxwell of Scott Wilson on 9

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March 2007, Alan Bell recommended that such a survey should be carried out.

The following should be considered in the ES:

- Impacts on lower plants.
- Mitigation and compensation for potential loss of any bat roosts.
- The proposed otter mitigation plan will also need to consider measures to reduce the risk of mortality from road traffic impacts, in addition to the measures mentioned in the Scoping Report.
- Measures to safeguard nesting birds.

Invasive species

In addition to the Japanese knotweed referred to in the Scoping report, *Rhododendron ponticum* must also be considered as it is ecologically at least as damaging an invasive plant as knotweed.. The removal of *R. ponticum* from woodlands along the road corridor would safeguard and improve the ecological value of the woodlands.

- Removal of *R. ponticum* should be evaluated in the ES as a likely means of mitigating and compensating for losses of trees and woodland for the road works.

Pedestrians, cyclists, water users and hill walkers

The A82 corridor forms the primary direct strategic link for all road-going modes of transport to the north from the western central belt. With regard to cycle journeys, there are no comparably direct alternative routes north. There are also good opportunities to link with existing cycle path infrastructure.

The lack of a safe, accessible route north alongside Loch Lomond limits the extent to which the western side of the National Park can be linked north to south in respect of active travel options and how it might be promoted for cycle tourism.

Loch Lomond is also nationally important for a range of recreational boating activities and there is a marina nearby at Ardlui. The area is also nationally important for walking and hill walking due to the presence of the West Highland Way National Long Distance Route and Ben Lomond and other heavily frequented munros.

The ES should demonstrate the following:

- That a strategic assessment has been carried out in order to determine how the route (Tarbet to Crianlarich) will function for cycle journeys as a whole and how it will link with wider cycle access infrastructure in the future.
- That the 'phased' approach being adopted for road upgrade is adequately informed by an over-arching strategy on cycle use.
- That appropriate measures aimed at improvement of infrastructure standards catering for cycle traffic will be incorporated into forthcoming upgrade/infrastructure schemes.
- Where other pedestrian and water borne access infrastructure (Core Paths, other paths and tracks etc) and facilities are likely to be affected. These should be identified and appropriate alternatives or mitigation proposed.

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- How the quality of the recreational experience of boating and walking in the northern part of the Loch Lomond basin and surrounding hills will be affected.

Road Drainage and the water environment

The Scoping Report identifies five water resource features within the 250m boundary considered around the proposed scheme. Impacts on water quality and potentially the geomorphology of all five features have been identified, mostly relating to surface water run-off and increased sediment discharge resulting from construction and operation of the viaduct. Appropriate mitigation should be included in the EIA, such as incorporation of SuDs to reduce and dilute run-off. We note that the addition of a SuDs scheme is like to improve current surface water quality and rates of run-off into the Loch.

The extent of, and impacts from, increased sediment are unclear at this stage, and viewing the initial surveys that have been undertaken in co-ordination with Loch Lomond Fish and Fisheries Trust on fish species would be helpful.

In addition to the rates and quality of surface water run-off, the EIA should:

- Ensure that the amount of sediment discharged is quantified and identify the appropriate mitigation.
- Identify riparian/loch shore areas which may require restoration and identify appropriate mitigation.
- Identify specific measures for control of potential oil spills.
- Identify any additional flood risk and appropriate mitigation.

We also note reference to the Finalised Draft Local Plan environmental policies (Chapter 4) which guide decision making on developments in and around the water environment. There are specific policies for protecting the integrity of the water environment, SuDs and engineering works which should be considered in development of the EIA (Policies ENV10 – ENV17). The EIA should also refer to the Water Framework Directive and the need to ensure that development along Loch Lomond should not compromise its high quality status.

We note that SEPA is a consultee on the proposed scheme and clarification of the appropriate authorisations to be sought and any accompanying information would be helpful to determine the extent of the work involved. Additional interest groups who may wish to be kept updated on the project include the Loch Lomond Association, Friends of Loch Lomond and Loch Lomond Fish and Fisheries Trust.

Geology and Soils

The ES should address how the loch-side soils will be retained during the construction phase and how slopes will be stabilised during and after the column construction to minimise increased loss of soils to loch-side erosion following disturbance.

Disruption during construction

The ES should include detailed information on the following:

- The likely timing of construction works and the impacts this will have on particular terrestrial and aquatic species
- How dust will be managed and its impact on species and habitats

LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

National Park Headquarters, Carrochan, Carrochan Road, Balloch, G83 8EG Long: 4°34'24"W Lat: 56°00'12"N

t: 01389 722600 f: 01389 722633 e: info@lochlomond-trossachs.org w: lochlomond-trossachs.org

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- The management of surface water runoff
- The prevention of sediment runoff
- The temporary impacts of noise, lighting and localised vehicle emissions
- The location of stores, site offices, temporary parking etc.
- The method for dealing with hazardous substances, storage, spills procedures etc
- NB this is an indicative list only and not exclusive.

Car parking and anti-social behaviour

There is an ongoing issue with inappropriate parking and high levels of almost constant use for 'wild camping' along the loch shores, especially in summer months. The parking is a hazard to road traffic users and the camping is damaging loch-side vegetation and resulting in the deposition of significant quantities of litter, human waste and vandalism. The NPA would encourage Transport Scotland to work with us to ensure that new verges created as part of the overall development of the A82 do not exacerbate this problem. Where possible, we want to see existing informal pull-offs being removed completely or reduced in size or otherwise modified to become more manageable and would welcome further discussion with Transport Scotland on this matter.

Where to next

The above comments are the result of an initial review of the Scoping Report by internal staff at the National Park, and include comments from our landscape, ecology, water, access, and tree and woodland advisors. We welcome further opportunities to discuss the scheme and the points raised in this letter with Scott Wilson and Transport Scotland – particularly the issue of cumulative impacts. We will be continuing to engage with Transport Scotland on the wider issues over lack of co-ordination or strategic perspective over the design and impacts of all of the road upgrade projects within this corridor.

As discussed, I will arrange a meeting some time in March to discuss our response with you in more detail.

In the meantime, please do not hesitate to contact me if you require copies of any of the reports mentioned in this letter.

Yours sincerely,



Fiona Newlove
Planner, Development Management

e-mail: fiona.newlove@lochlomond-trossachs.org
 tel: 01389727713

LOCH LOMOND & THE TROSSACHS NATIONAL PARK AUTHORITY

National Park Headquarters, Carrochan, Carrochan Road, Balloch, G83 8EG Long: 4°34'24"W Lat: 56°00'12"N
 t: 01389 722600 f: 01389 722633 e: info@lochlomond-trossachs.org w: lochlomond-trossachs.org

MEETING NOTES

Project A82 Pulpit Rock						
Job No				S100785	Date of Notes 19/03/10	Meeting No Sheet 1 of 4
Location , date and time of meeting Loch Lomond and Trossachs National Park Authority (LLTNPA) Headquarters, Balloch 18/03/10 1pm						
Subject of meeting Scope of Environmental Impact Assessment						
Persons present including representation (Followed by first Notes)						Action
<p>Fiona Newlove Planner, LLTNPA Lisa Duggan Landscape Manager, LLTNPA Alan Bell Natural Heritage Manager, LLTNPA</p> <p>Angus Kennedy Transport Scotland Duncan McCallum Transport Scotland</p> <p>Nigel Hackett Scott Wilson Ryan Hutchison Scott Wilson Zoë McClelland Scott Wilson Shelagh Brian Scott Wilson</p>						
Purpose of Meeting: To discuss the scope of the Environmental Impact Assessment for the A82 Pulpit Rock Scheme and in particular LLTNPA aspirations for a wider cumulative assessment.						
Apologies: Gordon Watson, LLTNPA Director.						
Environmental Impact Assessment – EIA Scoping Response <u>The current recommended scheme</u>						
<p>Previous consultation by TS/SW with the LLTNPA was discussed including an Options Workshop (12th June 2007), a Stage 2 Value for Money – Scheme Options Assessment (18th June 2008) and a meeting on the 13th July 2009 on Design options consultation.</p> <p>The LLTNPA is keen to see the Stage 2 Scheme Assessment Report to understand how the decision on the scheme design was reached. SW explained that the report is just being finalised and as soon as is ready for publication a copy will be sent to the LLTNPA. The LLTNPA queried an apparent lack of consultation. TS and SW pointed out that the Options Workshop which had been attended by the LLTNPA was the opportunity for LLTNPA input. The LLTNPA acknowledged a misunderstanding saying that an opportunity to comment in writing had been expected. It was agreed that a re-examination of the options was not required.</p> <p>LLTNPA is keen to ensure that an assessment of the main alternatives is included within the ES. SW explained that this will be done as standard and the introductory chapters will include a review of all the stage 2 options and clearly set out how the scheme was arrived at. NH said that the EIA procedure is in accordance with best practice recommended by the DMRB Volume 11. AK also explained that the tunnel option that was originally considered a favourable option by the LLTNPA was not taken forward as the Ground Investigations showed instability of a section of the rock at the south end of the study area. The instability of the rock meant that there would be a need for a large concrete portal and high retaining wall which would have impacts on the retaining wall for the railway line and from a purely engineering perspective was not desirable. It would also have adverse landscape and visual effects resulting from the required works and would have an increased requirement for road closures over the other options and an increased cost relative to the other options When these issues were originally discussed with LLTNPA at the options consultation meeting LLTNPA agreed that the Tunnel option was less viable and as such their next preferred scheme was either of the viaduct options. AB indicated that he recalled the discussion at the options consultation meeting and he commented that the likelihood of approach</p>						
						SW

lighting required for the Tunnel option had also been of concern to LLTNPA.

Cumulative Effects

The LLTNPA would like to see all construction works along the A82 co-ordinated so as to cause the least disruption locally.

A discussion was then held on the cumulative impacts assessment that the LLTNPA has requested within the ES. It was agreed, as stated in the scoping report, that the area for the cumulative assessment should comprise Tarbet to Crianlarich. However the LLTNPA response asked for the following projects to be considered:

- A82 widening and re-alignment Tarbet to Crainlarich including Stuckendroin Bridge widening and road straightening, full reconstruction and partial realignment south of Inverarnan, Crianlarich bypass and re-alignment of West Highland Way spur
- Sloy Power Station, construction of pumping station and removal of woodland
- Glen Falloch Hydro scheme with associated pump houses and connections to the national grid by overhead lines
- Scottish and Southern Energy – new transformer, overhead lines and access tracks
- Cononish proposed gold mine operation including car park, access track upgrade and associated processing plant.
- Rossdhu Golf Course

Both Rossdhu Golf Course and Cononish Mine are outside of the agreed scope but the LLTNPA would like them considered only from a landscape perspective.

SW

With regards to the rest of the developments within the agreed area it was also stressed that the assessment will be based on the available information and that it will necessarily be a high-level assessment. In addition some assumptions will have to be made where no information is available, however, where this is the case it will be clearly stated within the ES.

It was concluded that the main purpose of the cumulative assessment would be to assess the landscape experience along the A82 and also address the impacts on woodland; however, all other topics in the ES will consider the cumulative impacts as far as possible.

Notes on specific developments:

Cononish Mine – car park proposed and cumulative impact expected from the traffic impact particularly during the construction stage (as may be built at same time as Pulpit Rock) and the proposed development also includes elements next to the road which, together with the Crianlarich bypass, will affect the landscape experience along the A82.

Crianlarich Bypass – main issue here is the signage/ clutter and the changing landscape experience along the A82. TS confirmed that only required signage would be installed, private signage on private land was outside of TS remit to control

Sloy Power station – issue with woodland removal and also large amount of rock to be taken off-site (this may be available for use in this project).

SSE Transformer – no detail on this development has been obtained by SW. LLTNPA provided a contact within SSE – ZM to follow up.

SW

(As Stuckendroin bridge and the SSE Transformer have already begun construction works these developments will be considered both as baseline for the landscape assessment and as part of the cumulative chapter).

It was agreed that SW would provided the LLTNPA with a draft of the cumulative assessment prior to publication to allow for comment and input.

SW

Landscape and Visual Impacts

The LLTNPA asked SW to agree the viewpoint locations - ongoing communication required between Shelagh Brian and Lisa Duggan. (After the meeting viewpoints were agreed with the LLTNPA. SB to send a map with ZVI and viewpoint locations for confirmation)

SW

All receptors were agreed with the LLTNPA. With regards to mitigation it should be noted that for signage TS anticipates only a minimal number of safety related signs to be required at Pulpit Rock. This is likely to be less than the current signage for the traffic signals however; the final sign layout will be produced later as part of the detailed design. There is no lighting planned.

SW will specify a design framework for the Design and Build Contractor which will include treatment of rock slopes and vegetation clearance issues. The LLTNPA queried the Design and Build contract procedure in relation to the control of the design. TS and SW explained that there would be Employers Requirements provide control in this respect and the mitigation commitments in the ES would also be taken forward to the Employer's Requirements.

It was agreed that the ES will also provide mitigation for the scheme footprint only and not along the A82 route.

Traffic Noise

It was agreed that operational traffic noise has been scoped out of the ES; however, construction noise will be addressed in the Disruption due to Construction chapter. The LLTNPA comment on traffic noise is with regards to the landscape experience as it relates to traffic noise and this will be addressed under the heading of 'tranquillity' in the landscape chapter. It should be noted that the situation regarding traffic noise is likely to be an improvement as traffic will be free-flowing as compared to current situation where traffic is forced to halt at the traffic signals.

Land Use

It was agreed that any land lost as a result of the scheme will not be considered valuable grazing land. The LLTNPA expressed concern that removing grazing sheep will result in the growth of trees which block open views. SW pointed out that the landowner has confirmed that this land is not used for grazing and the ES will state clearly that there will be no loss of open land.

Cultural Heritage

SW informed that the cultural heritage assessment confirms that there are no crannogs in the vicinity of the scheme. SW also informed that Historic Scotland has set requirements for protection of the Pulpit Rock Scheduled Monument (SM) during construction (fence off 20m perimeter). The setting of the SM will be considered within the landscape chapter.

There was discussion about the provision of public access and interpretation to the SM. SW informed that Historic Scotland stated that it may be desirable to improve the current access arrangements with a more formalised public access; however, the scheme design does not include provision for a lay-by due to safety considerations and, following discussion with LLTNPA access officer, to discourage wild camping in the Park. Therefore there is currently no formal provision for improved access to the SM. The LLTNPA acknowledged the constraints and indicated that remote interpretation for the SM could be provided elsewhere.

Trees and Woodland

The number of mature and veteran trees that will need to be removed for the scheme will be addressed within the ES. SW expressed concern that there would not be sufficient detailed information available for the cumulative assessment.

The LLTNPA would like SW to make an estimate of the number of trees to be removed for other schemes and then estimate the percentage of veteran/mature trees that will be removed. LLTNPA confirmed that it is not expecting a full survey and that any estimate should clearly show the underlying rationale.

SW

TS stated that if the cumulative effects shows significant impact from other developments it would not expect this to affect the progression of the scheme. Any mitigation should be proportionate to the scheme.

Impact on Loch Lomond Woods SAC

SW informed that the impact on the SAC would be addressed through an Appropriate Assessment of the scheme and this would be referred to in the ES.

Native and Protected Species

SW informed that the lower plants including epiphytes have been surveyed. In addition the following surveys have also been carried out:

- Phase 1 NVC
- Bat surveys
- Extensive otter surveys of both sides of the loch north of Taret
- Bryophytes and epiphytes
- Aquatic microphytes
- Pine marten, red squirrel, badger and wildcat
- Amphibians

- 3 separate fish surveys (copies of which were provided to Alan Bell of NPA)
- Invertebrates
- Bird surveys and breeding bird surveys

Invasive Species

SW informed that ecology surveys had indicated there was that no rhododendron within scheme footprint.

Pedestrians, cyclists, water users and hill walkers

TS/ SW explained that the design of the scheme includes provision for pedestrians and cyclists. Incorporation of footpath/cycle path has been to future proof the scheme should cycling provision be extended along the length of the A82.

The LLTNPA explained that it is a key aspiration to have a cycle path along the full length of the A82, however TS explained it was not in a position to deliver that within the current context of the Pulpit Rock Scheme.

The cumulative assessment should assume that all of the proposed Transerve schemes along the A82 will include cycle provision as promoted in accordance with the 'Trunk Road Cycling Initiative' document.

SW

Road Drainage and the Water Environment

SW stated they were content with the LLTNPA requirements proposed in their letter to be covered in the ES but pointed out that it is almost impossible to quantify the amount of sediment to be discharged, therefore, it will be addressed within the ES but not quantified.

Disruption due to Construction

SW are content with the LLTNPA requirements for this chapter, but pointed out that as the scheme will be built under a Design and Build Contract the ES will identify likely construction compounds but not be able to provide detail on exact location of stores, sites offices etc.

Strathfillan Community Council

The LLTNPA informed SW/TS that it had been copied into a response sent to SW for the scoping study from Strathfillan CC. SW and TS are currently drafting a response to Strathfillan CC which would be copied to the LLTNPA.

Next steps

The ES will be published in approximately the next three months.
 The NPA as a statutory consultee will have an opportunity to review and raise concerns.
 The NPA would like further dialogue on the cumulative effects chapter and the design.

Loch Lomond Fisheries Trust

From: [Andy Burrows](#)
To: [Zoe McClelland](#)
Subject: Pulpit rock fish survey
Date: 09 February 2010 19:51:38
Attachments: [Pulpit2010report.doc](#)

Zoe,

Thanks for the copy of the EIA scoping report. Please find attached our report of the fisheries survey we conducted in January.
I would be grateful if you could acknowledge receipt of this email.

Regards,

Andy

Dr. Andrew Burrows
Senior Fisheries Biologist
Loch Lomond Fisheries Trust
Scottish Centre for Ecology and the Natural Environment
Rowardennan
Glasgow
G63 0AW

01360 870515 (Direct Line)

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Scottish Government

T: 0131-244 7141 F: 0131-244 7083
E: Rhona.reid@scotland.gsi.gov.uk

Zoe McClelland
Scott Wilson Scotland Ltd
23 Chester Street
Edinburgh
EH3 7EN

Your ref: S100785/e06
Our ref: EIA/LNP/004
1 February 2010

Dear Ms McClelland

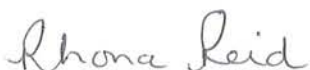
**ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 1999 -
A82 PULPIT ROCK IMPROVEMENT SCHEME BETWEEN TARBET AND CRANLARICH
(SCOPING OPINION)**

I am writing to acknowledge receipt of your letter of 25 January 2010 enclosing details concerning a scoping opinion related to a future EIA for the above development.

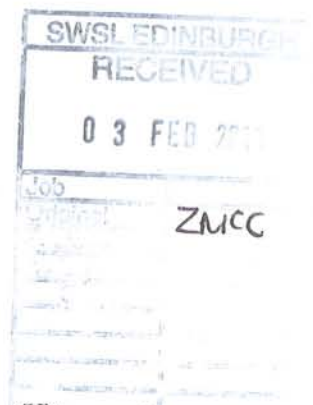
Accordingly, the papers are now being circulated to interested parties within the Scottish Government, who have been asked to send information/responses direct by 26 February 2010. However, if any of these parties have queries, or require additional time to reply, they have been advised to contact you to negotiate, by agreement, a revised time-scale, etc.

You should note that any details provided by the Scottish Government relates solely to a request for information under section 10 of the Environmental Impact Assessment (Scotland) Regulations 1999.

Yours sincerely

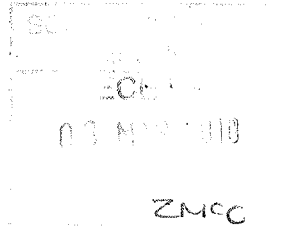


RHONA REID



T: 0131-244 0853 F: 0131-244 0211
E: Eleanor.vance@scotland.gsi.gov.uk

Ms Zoe McClelland
Scott Wilson
23 Chester Street
Edinburgh
EH3 7EN



Your ref: S100785/e06
Our ref: 29/10 – B3693558

2 March 2010

Dear Ms McClelland

**ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 1999
PROPOSED A82 PULPIT ROCK IMPROVEMENT SCHEME BETWEEN TARBET AND
CRIANLARICH (SCOPING)**

I refer to your recent consultation under the 1999 Regulations with the Scottish Ministers about the proposed development named above. I apologise for the delay in replying.

The above Regulations provide that, among others, Scottish Ministers must make available to the applicant any information they consider relevant to the preparation of an Environmental Statement. This response relates to Scottish Ministers' responsibilities for water supply, water protection, sewerage, flood prevention, coastal protection, waste disposal, soils, air quality and noise.

The developer should be made aware of 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 Environmental Statement. A copy of the regulations is available from Her Majesty's Stationery office.

In relation to the above development, without prejudice to any further consideration Scottish Ministers may be required to give to the application, we have no information available which may be considered relevant to the preparation of an Environmental Statement.

Yours sincerely



Eleanor Vance

Scottish Water



29th January 2010

Ms Z Mclelland
Scott Wilson
23 Chester Street
Edinburgh
EH3 7EN

SCOTTISH WATER

419 Balmore Road
Glasgow
G22 6NU

T: 0141 355 5511
F: 0141 355 5449
W: www.scottishwater.co.uk

Dear Ms McLelland

Development: A82 Pulpit Rock Improvement

Thank you for your letter dated 25th January 2010 regarding the above.

Following a review of your application and our resultant investigation, I am pleased to advise you that Scottish Water assets are not affected. However, if you subsequently discover or become aware of any public sewers or water mains, I would ask you to contact me directly at your earliest convenience.

In the meantime, if you have any questions regarding this letter, please contact me at the above address.

Yours faithfully

A handwritten signature in black ink, appearing to be "Fiona Campbell".

Fiona Campbell
Technical Administrator
Customer Connections



Scottish Environment Protection Agency (SEPA)

RECEIVED
24 FEB 2010
ZMCC

Our ref: PCS 105637
Your ref: S100785/e09

If telephoning ask for:
Julie Gerc

22 February 2010

FAO Zoe McClelland
Scott Wilson
23 Chester St.,
Edinburgh
EH3 7EN

Dear Ms McClelland

**The Environmental Impact Assessment (EIA) (Scotland) Regulations 1999 (as amended) Scoping consultation
A82 Pulpit Rock Improvement**

Thank you for consulting SEPA on the scoping opinion for the above development proposal by way of your letter of 25/01/10 which we received on 28/01/10. We welcome continued discussions with the applicant regarding any of the issues raised in this letter. We consider that the key issues to be addressed in the EIA process are mostly covered in the scoping report, however we would offer the following comments.

1. Construction Phase

- 1.1 SEPA believes that the environmental impact of this proposal can best be minimised by employing best practice and implementing agreed mitigation measures when work at the site begins. Our principle area of concern is centred on construction activities in and adjacent to Loch Lomond.
- 1.2 We would expect references to Pollution Prevention Guidance Notes and other statutory guidance within the EIA but would consider that the production of a Construction Method Statement (CMS) is essential. Before compilation of a CMS, it is essential that baseline information is available for all environmental receptors at and adjacent to the site considered to be "at risk" from the development.
- 1.3 The effectiveness of proposed mitigation measure must be assessed through regular environmental monitoring on site and comparison with conditions on site prior to any works commencing. SEPA would expect to see the inclusion of monitoring proposals within the CMS
- 1.4 Having a Construction Method Statement will only be effective if it is fully implemented by all operators on site. When work commences, it is essential that there is a named person responsible for the CMS who has the necessary expertise and authority to control works on site. A named responsible person should always be on site whenever works are in progress.



Chairman
David Sigsworth
Chief Executive
Dr Campbell Gemmill

East Kilbride Office
5 Redwood Crescent, Peel Park,
East Kilbride G74 5PP
tel 01355 574200 fax 01355 574688
www.sepa.org.uk

2. CAR Authorisation

- 2.1 All activities with potential to impact on the water environment require to be authorised under the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (CAR) (as amended). The level of authorisation required is dependent on the anticipated environmental risk posed by the activity to be carried out. The lower the risk, the lower level of control required. Authorisation may be as straightforward as compliance with an appropriate General Binding Rule (GBR), moving through to registration with SEPA, up to compliance with site-specific conditions imposed in a licence issued by SEPA. Alterations to, or works on the banks or within a water body will constitute an activity which requires to be authorised under The Water Environment (Controlled Activities) (Scotland) Regulations 2005 (as amended) (CAR).
- 2.2 Further information on this subject can be found on our website at www.sepa.org.uk/pdf/wfd/regimes/car_practical_guide.pdf. As well as works in Loch Lomond, there are a number of other aspects of this proposal which would fall within the scope of the 2005 Regulations. These include the construction works, the potential provision of watercourse crossings, and also construction drainage.
- 2.3 At the meeting on 22 July 2009 Scott Wilson were advised on the CAR engineering requirements by our local staff.

3. Operational Phase

4. Surface Water Drainage

- 4.1 The proposed discharge of surface water to the water environment must be in accordance with the principles of the SUDS Manual (C697) which was published by CIRIA in March 2007.
- 4.2 The discharge of surface water must comply with the terms of the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (as amended). Further information on this matter can be found on our website at http://www.sepa.org.uk/water/water_publications.aspx
- 4.3 The proposal is to upgrade 400m carriageway with the extension of up to 3 cross carriageway culverts. We would seek clarification as to why the decision has been taken to install oil interceptors, for which there is a maintenance requirement. Filter drains could be as effective in dealing with the anticipated run off and it is noted that filter drains are one of the options being considered.
- 4.4 For surface water run off, reference should be made to the SEPA Regulatory Method RM08. http://www.sepa.org.uk/water/water_regulation/guidance/pollution_control.aspx It is anticipated that for the section being worked on, it would be covered by a General Binding Rule. Only large scale or specific environmental level of risk would require a simple licence.
- 4.5 'Combined kerbing' is proposed on the bridge deck and we would ask what this comprises and how it might be drained.

5. Flood Risk

- 5.1 We have reviewed the information provided in this consultation and it is noted that the proposed development site (or parts thereof) lies within the 1 in 200 year (0.5% annual probability) flood envelope of the Indicative River & Coastal Flood Map (Scotland), and may therefore be at medium to high risk of flooding.

- 5.2 Scottish Planning Policy 7: Planning and Flooding states, in paragraphs 16 and 17 respectively, that “For planning purposes the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year” and “Built development should not therefore take place on the functional flood plain.”
- 5.3 However, the proposed development cannot be located elsewhere and it is considered that it is not likely to have an adverse effect on flood risk.

6. Caveats & Additional Information for Applicant

- 6.1 The Indicative River & Coastal Flood Map (Scotland) has been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river cross-sections and low-lying coastal land. The outlines do not account for flooding arising from sources such as surface water runoff, surcharged culverts or drainage systems. The methodology was not designed to quantify the impacts of factors such as flood alleviation measures, buildings and transport infrastructure on flood conveyance & storage. The Indicative River & Coastal Flood Map (Scotland) is designed to be used as a national strategic assessment of flood risk to support planning policy in Scotland. For further information please visit www.sepa.org.uk/flooding/flood_map.aspx.
- 6.2 The flood advice contained in this letter is supplied to you by SEPA under the Environmental Information (Scotland) Regulations 2004 in response to your request for information under these regulations.

7. Regulatory advice

- 7.1 Details of regulatory requirements and good practice advice for the applicant can be found on our website at www.sepa.org.uk/planning. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the Environmental Protection and Improvement Team in your local SEPA office at:

Balloch Office
Carrochan
Carrochan Road
Balloch
G83 8EG

If you have any queries relating to this letter, please contact me by telephone on 01355 574200 or e-mail at planning.ek@sepa.org.uk

Yours sincerely

Julie Gerc
Planning Officer
Planning Service

From: [Wallace, David](#)
To: [Zoe McClelland](#)
Subject: FW: A82 Pulpit Rock Improvements - Consultation
Date: 02 August 2010 14:27:31

Zoe

See Neil's comments. Your proposal is satisfactory.

Regards

David

From: McLean, Neil
Sent: 30 July 2010 16:37
To: Wallace, David
Cc: 'Zoe McClelland'
Subject: RE: A82 Pulpit Rock Improvements - Consultation

David,

This looks fine to me. The longer the length of dry swale the better, but under the circumstances, I consider this to be taking "reasonable steps" to protect the water environment. I will let you respond directly to Zoe.

Thanks,

Neil McLean

SUDS Co-ordinator
Environmental Technologies, Environmental Guidance Unit
Scottish Environment Protection Agency
Erskine Court, Castle Business Park, STIRLING, FK9 4TR,
01786 - 455 979

From: Zoe McClelland [mailto:Zoe.McClelland@scottwilson.com]
Sent: 30 July 2010 16:09
To: McLean, Neil
Cc: Wallace, David; Ryan Hutchison; Harlene O'Neill; Sandy.Jamieson@transportscotland.gsi.gov.uk
Subject: RE: A82 Pulpit Rock Improvements - Consultation

Neil
ccDavid

Apologies to come back to you again but further to our recent correspondence on the drainage proposals for the A82 Pulpit Rock Improvements we have since consulted with the Flood Authority - Ian Gilfillan, Flood Alleviation Manager for Argyll & Bute Council who has confirmed that attenuation is not required in our drainage design. In response to this we propose to amend our drainage design to substitute the proposed detention basin for a less intrusive treatment stage such as a dry swale incorporating a filter bed and under-drain system which can be modelled to fit the topography, reduce the disturbance to the historic monument, reduce land take as no maintenance lay-by is required and utilise the existing site access. We believe this alteration will still provide a suitable treatment solution under General Binding Rule 10.

I would be grateful if you could review the attached drawing and ensure you are still happy for us to proceed as this is the design that will be proposed in the Environmental Statement.

Many thanks and best regards,
Zoë

Zoë McClelland MRTPI
Senior Planning consultant
T +44 (0)131 718 5202



RTPI

mediation of space - making of place

**Winner – Planning Consultancy of the Year
RTPI Planning Awards 2009**

From: McLean, Neil [mailto:Neil.McLean@sepa.org.uk]
Sent: 18 May 2010 15:13
To: Zoe McClelland
Cc: Wallace, David
Subject: RE: A82 Pulpit Rock Improvements - Consultation

Zoe,

Thanks for the detail proposed for the A82 improvement works at Pulpit Rock.

I can confirm that the proposal is acceptable to SEPA. As you correctly state 2 levels of treatment are generally expected for such works, however we note that it will not only be expensive to create an additional level for the southern end of the works, but it may have significant impact on the surrounding area. General Binding Rule 10 requires that all reasonable steps are taken to protect the water environment. Under these constraints we are satisfied that the proposed works are taking "reasonable" steps.

This confirms an earlier response from David Wallace to the same effect.

Regards,

Neil McLean

SUDS Co-ordinator
Environmental Technologies
Environmental Guidance Unit
Scottish Environment Protection Agency
Erskine Court, Castle Business Park,
STIRLING, FK9 4TR,
01786 - 455 979

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From: Zoe McClelland [mailto:Zoe.McClelland@scottwilson.com]
Sent: 14 May 2010 12:04
To: McLean, Neil
Cc: Wallace, David; Holmes, Julie; Sandy.Jamieson@transportscotland.gsi.gov.uk; Ryan Hutchison
Subject: RE: A82 Pulpit Rock Improvements - Consultation

Neil,

Thanks for taking the time to chat with me just now regarding the drainage proposals for the A82 Pulpit Rock Scheme. I have attached a drawing showing the current drainage proposals and also a letter that we sent to David Wallace at the start of March explaining the site constraints and details of the current proposals.

It appears that there may have been some miscommunication regarding SEPAs position and it would be great if you could respond to let me know if you satisfied for the current proposals to be taken forward.

Many thanks for your help in this matter,
Zoë

Zoë McClelland MRTPI
Senior Planning consultant

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E zoe.mcclelland@scottwilson.com



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From: McLean, Neil [mailto:Neil.McLean@SEPA.org.uk]
Sent: 13 May 2010 10:53
To: Sandy.Jamieson@transportscotland.gsi.gov.uk; Ryan Hutchison; Zoe McClelland
Cc: Wallace, David; Holmes, Julie
Subject: RE: A82 Pulpit Rock Improvements - Consultation

Ryan/Zoe,

I have been asked by a colleague in SEPA to approach you regarding SUDS provisions for the Pulpit Rock stretch of the A82. As you will know David Wallace has been dealing with this site and in my opinion has the technical competence and experience to handle the matter. I have spoken to David and in my view what has been suggested for this stretch meets with SEPA's requirements when considering the fairly constrained circumstances and projected traffic volumes. I have not been given plans or site details.

As SUDS Co-ordinator for SEPA, if you have any need to consider this further I would be happy to discuss with you.

Regards,

Neil McLean
SUDS Co-ordinator
Environmental Technologies
Environmental Guidance Unit
Scottish Environment Protection Agency
Erskine Court, Castle Business Park,
STIRLING, FK9 4TR,
01786 - 455 979

size=2 width="100%" align=center>

From: Sandy.Jamieson@transportscotland.gsi.gov.uk
[mailto:Sandy.Jamieson@transportscotland.gsi.gov.uk]
Sent: 06 May 2010 13:42
To: McLean, Neil
Subject: A82 Pulpit Rock Improvements - Consultation

Neil,

Many thanks for calling me today in relation to the A82 Pulpit Rock Improvement scheme.

As requested, please find below the email address / roles for relevant contacts at our consultants for this scheme, Scott Wilson.

Ryan Hutchison Ryan.Hutchison@scottwilson.com (Project Manager / Director)
Zoe McClelland Zoe.McClelland@scottwilson.com (Environmental Specialist)

As discussed, we would be happy to meet at a location of your choice.

Regards,

Sandy

Sandy Jamieson
Project Manager
Transport Scotland
Major Transport Infrastructure Projects
Buchanan House
58 Port Dundas Road
Glasgow
G3 0HF
Tel: 0141 272 7219

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Scottish Natural Heritage (SNH)



Scottish Natural Heritage
All of nature for all of Scotland

Ms Zoe McLelland
Scott Wilson
23 Chester Street
Edinburgh
EH3 7EN

Your ref: S100785/e10

Our ref: CNS/TR-A82 TRUNK
ROAD IMPROVEMENTS

Date: 25 February 2010

Dear Zoe

**A82 PULPIT ROCK IMPROVEMENT CONSULTATION
LOCH LOMOND WOODS SPECIAL AREA OF CONSERVATION (SAC)**

Thank you for your letter asking for Scottish Natural Heritage's (SNH) comments regarding the above. We have the following comments to make;

I am pleased to see that the Scoping Report covers all of the key areas we referred to in our initial letter to Tomas McLoughlin of Scott Wilson, Glasgow office on 5 March 2007 which I have enclosed below for your reference.

The additional comments I would like to make relate to Loch Lomond Woods Special Area of Conservation (SAC) and cumulative effects on otters, which are both a European Protected Species, and qualifying interest of the SAC.

I note that in 10.3.2 (page 25) that 'potential impacts of the scheme on Loch Lomond Woods SAC will be addressed separately through an Appropriate Assessment Screening'. We would like to see included in that screening process consideration given to the cumulative impacts on otters of the many Transverse Scotland road improvements that have been carried out or are proposed to be carried out on the A82.

Please don't hesitate to contact me should you have any queries regarding the above.

Yours sincerely

Emma Collie

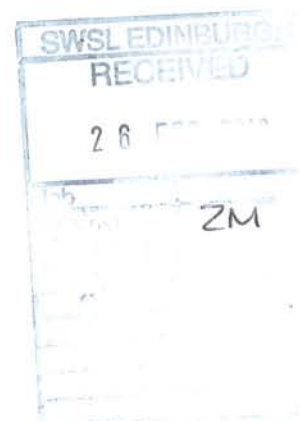
PP **KAREN PHILLIP**
Area Officer
Argyll and Stirling
Enc



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Tel 01786 450362 Fax 01786 451974 www.snh.org.uk





Scottish Natural Heritage

All of nature for all of Scotland

Mr Tomás McLoughlin
Scott Wilson Scotland Ltd
6 Park Circus
Glasgow
G3 6AX

Your ref: S100785/PSS/tpm

Our ref: CNS/TRU/A82

Date: 5 March 2007

Dear Mr McLoughlin

A82 TRUNK ROAD IMPROVEMENTS – PULPIT ROCK NORTH OF TARBET

Thank you for your letter dated 26 February 2007 requesting information from Scottish Natural Heritage in relation to the above proposal and the desk study you are carrying out. Comments below are also aimed at targeting later stages of the proposal planning. Subsequent to your initial consultation we have been contacted by your ecologist Fraser Maxwell on surveys proposed and I have therefore incorporated comment on his proposals in this letter.

1. DESIGNATED SITES

I can confirm that there are no Sites of Special Scientific Interest or Natura Sites (Special Protection Areas or Special Areas of Conservation) in the immediate vicinity of the proposals. The nearest designated sites are Ben Vorlich SSSI, an upland site directly to the west 1km, and Pollochro Woods SSSI (part of the Loch Lomond Woods SAC) on the opposite shore of Loch Lomond. You will be aware that the proposal area is within the Loch Lomond and Trossachs National Park, and the Loch Lomond National Scenic Area.

2. PROTECTED SPECIES

SNH does not routinely hold species records and data in our offices and we would therefore expect any proposed development to carry out adequate targeted ecological survey work before any proposal is taken forward. We are pleased to note the thorough surveys proposed in this case by Fraser, which cover the majority of issues noted below.

2.1 EUROPEAN PROTECTED SPECIES

Scottish Natural Heritage is obliged to inform developers about protected species, including 'European Protected Species' (EPS), which may be affected by certain proposals. In this instance bats and otter may be of relevance, and we note that surveys for these species are proposed by your ecologist.



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Mature trees (particularly trees with rot holes and cracks) within the proposal's footprint may well provide important roosting sites for a variety of species of bats.

Loch shoreline habitat within the development footprint may well provide important resting sites and/or breeding sites for otter, and this species is a qualifying feature of the Loch Lomond Woods SAC. Current SNH advice is that development and ground investigation works within 50 metres of otter resting places or holts should be considered in relation to the potential offences relating to otter. Details of the legal situation which applies to EPS are given in the Appendix to this letter.

2.1.1 SNH advice

We strongly recommend that surveys for bats and otter are undertaken at the earliest opportunity and prior to determining whether the proposal should go ahead, in order to clarify where licensing from the Scottish Executive may be required. The type of survey required would involve:

- **Bats: SNH recommends that a survey should be carried out for bat roost sites. This should include in any mature trees that are to be felled or lopped as part of the ground investigation or development itself. This will indicate whether licensing will be required to carry out ground investigations and/or construction.**
- **Otter: SNH recommends that a survey should be undertaken to check for signs of otter including sprainting sites, holts and couches. This will indicate whether licensing will be required to carry out ground investigations and/or construction.**

2.2 FISH

2.2.1 ATLANTIC SALMON

Atlantic salmon are present in Loch Lomond, and are an interest feature of the Endrick Water Special Area of Conservation (SAC). This species is also listed on Annex 2 of EC Directive 92/43/EEC the 'Habitats Directive'.

Engineering works affecting loch shore have the potential to impact on Atlantic salmon or their habitat. **SNH therefore recommends that if such an option is considered, a survey should be completed to determine the location of habitats important to Atlantic Salmon. Appropriate mitigation measures should also be identified.**

2.2.2 LAMPREY

Survey work has shown that lamprey are present in Loch Lomond and are an interest feature of the Endrick Water SSSI and SAC. All three species are listed on Annex 2 of EC Directive 92/43/EEC the 'Habitats Directive'.

Engineering works affecting the loch shore have the potential to impact on lampreys or their habitat. **SNH therefore recommends that if such an option is considered a survey should be completed to determine whether lamprey or habitats important to lamprey are in the areas affected.** Should lampreys be present then appropriate mitigation measures should also be identified.

2.2.3 OTHER FISH SPECIES

Loch Lomond is an important site for a number of fish species, including sea trout, and in particular powan, which is only found in one other loch in Scotland. A concern would be possible impacts on powan spawning and nursery sites. SNH are co-funding a PhD looking at the status of powan in Loch Lomond and the initial findings are suggesting alarming declines. If the option of building out into the loch is further considered, SNH therefore recommends that adequate fisheries impact data is produced.

2.3 OTHER MAMMALS

As you will be aware, badgers and their setts are subject to legal protection under the Protection of Badgers Act 1992 (as amended). It is an offence to wilfully kill, injure, or ill-treat a badger. Their setts are also protected from obstruction, destruction, damage and, when active, from disturbance. Any work within 30 metres of the badger sett may require a licence from SNH and if destruction of the sett is unavoidable then a licence is required from SNH beforehand.

In relation to red squirrels, wild cats and water voles it is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place which are used for shelter or protection by these species, and to disturb them while they are using such a place.

Since SNH has no baseline data in the area for these species, SNH recommend that surveys are undertaken for the development footprint as part of the general ecological survey considerations. And welcomes the fact that these have been scheduled by the ecologist.

2.4 BASELINE HABITAT SURVEY

SNH recommends that a Phase 1 survey of the area affected is carried out and the results used to assess whether works will affect scarce habitats, and control non-native invasive species. A Phase II or NVC survey of the woodland strip between the A82 road and the railway is proposed and SNH agree that due to the unmanaged and inaccessible nature of this area it warrants more detailed survey.

2.5 BIRDS

We note the intention to carry out common bird census in the strip of woodland between the railway and the road, and suggest that shoreline surveys are also included in those areas where extension out over the loch is possible and a shoreline exists.

3 LANDSCAPE

SNH recommends that a landscape and visual impact assessment is completed for any structures associated with this proposal, since it is within the National Scenic Area and the National Park. The Loch Lomond National Park's landscape advisors will be able to give further advice on these issues.

If you need any further information or advice from SNH in relation to this proposal then please do not hesitate to contact me at the above address.

Yours sincerely

DARREN HEMSLEY

Area Officer

Stirling and Argyll

Stirling Council



Zoe McClelland
 Scott Wilson
 23 Chester Street
 Edinburgh EH3 7EN

Roads, Transport and Open Space
 Stirling Council
 Viewforth, Stirling FK8 2ET

Head of Service: Les Goodfellow

Tel: 01786 443401

Fax: 01786 442541

Email: padmorej@stirling.gov.uk

Ref: TP05.Projects

Your Ref: S100785/e11

Date: 16th March 2010

Dear Zoe

A82 Pulpit Rock Improvement Consultation

Thank you for the opportunity to comment on the A82 Pulpit Rock Improvement proposed by Transport Scotland as part of the A82 Route Improvement Programme.

While the location of the improvement lies outwith Stirling Council's area, it is a bottle neck on one of the two north-south trunk roads that serve the communities of Crianlarich and Tyndrum in the north of Stirling Council area.

Accordingly we support the proposal as we would expect the proposed improvements to:

- Improve journey time and reliability to and from the communities and businesses in the north of Stirling to the greater Glasgow area;
- In removing a bottleneck and making the A82 more attractive for those vehicles (particularly heavy goods vehicles) who could use either the A82 or A84, there may be some removal of traffic from communities on A84;
- When there are severe accidents or major infrastructure works on either the A82 or A84 / A85, there is often the necessity to implement a major diversion by the alternative route. When this involves diversion via the A82, the problems of the pinch point at Pulpit Rock become even more acute.

In the same vein as the last bullet point, we would anticipate the construction works at Pulpit Rock would necessitate not only severe diversions for the communities of Tyndrum and Crianlarich, but also times when there would be significantly additional traffic diverted via communities on the A84. When this is necessary, we trust that this would be timed to minimise impact, but we would also request that the communities likely to be affected on the A84/A85 are warned of potential traffic disruption and temporary traffic management measures are considered to alleviate problems created by the additional traffic.

Yours sincerely

Jonathan Padmore

Jonathan Padmore
 Transport Planning Team Leader
 Roads & Transport Development

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