

# Citizen Participation and Public Petitions Committee

19th Meeting, 2022 (Session 6), Wednesday  
21 December 2022

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

<b>Petitioner</b>	John Urquhart on behalf of Helensburgh and District Access Trust and The Friends of Loch Lomond and The Trossachs
<b>Petition summary</b>	Calling on the Scottish Parliament to urge the Scottish Government to reconsider the process for selecting the preferred option for the planned upgrade of the A82 between Tarbet and Inverarnan, and replace the Design Manual for Roads and Bridges (DMRB) based assessment with the more comprehensive Scottish Transport Appraisal Guidance.
<b>Webpage</b>	<a href="https://petitions.parliament.scot/petitions/PE1967">https://petitions.parliament.scot/petitions/PE1967</a>

### Introduction

1. This is a new petition that was lodged on 18 October 2022.
2. A full summary of this petition and its aims can be found at **Annexe A**.
3. A SPICe briefing has been prepared to inform the Committee's consideration of the petition and can be found at **Annexe B**.
4. While not a formal requirement, petitioners have the option to collect signatures on their petition. On this occasion, the petitioner elected to collect this information. 526 signatures have been received.

5. The Committee seeks views from the Scottish Government on all new petitions before they are formally considered. A response has been received from the Scottish Government and is included at **Annexe C** of this paper.
6. Two submissions have been provided by the petitioner. These are included at **Annexe D**.

## Action

The Committee is invited to consider what action it wishes to take on this petition.

**Clerk to the Committee**

## Annexe A

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

### Petitioner

John Urquhart on behalf of Helensburgh and District Access Trust and The Friends of Loch Lomond and The Trossachs

### Date lodged

18 October 2022

### Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to reconsider the process for selecting the preferred option for the planned upgrade of the A82 between Tarbet and Inverarnan, and replace the Design Manual for Roads and Bridges (DMRB) based assessment with the more comprehensive Scottish Transport Appraisal Guidance.

### Previous action

We have held face to face meetings with Ross Greer MSP and Jackie Baillie MSP.

A campaign has been conducted aimed at informing officials, politicians and the public about the issues posed by the A82 upgrade proposal. This has included letters to the press, an article in the Glasgow Herald's 'Agenda' column and a deputation to the board of Loch Lomond and The Trossachs National Park.

We have also submitted Freedom of Information (FOI) requests, which revealed that route selection was made without full and comprehensive cost benefit analysis of all options.

### Background information

Reflecting Loch Lomond's National Park status and outstanding natural beauty as well as taking into account wider long term environmental,

recreational, economic and social benefits, we feel that pursuing the high road option would offer the following advantages:

- Oak woods and shoreline preserved, allowing wildlife and people to reconnect;
- Old road could continue to carry traffic during the construction period and afterwards would be available as a walking and cycling route;
- The existing road would continue to be available for access to property and for occasional use as a diversion when necessary;
- The Three Lochs Way Great Walking Trail could be linked to the West Highland Way at Inverarnan;
- Tarbet and Ardlui would be by-passed by heavy traffic, improving quality of life for residents and alleviating road safety issues at Arrochar Primary School;
- The higher, straighter route would be faster and safer than any loch side route could ever be;
- Alleviating visitor management pressures along whole length of old road and in the congested Tarbet Bay area;
- A high road would give stunning views of Loch Lomond.

## Annexe B

The logo for SPICe, featuring the letters 'SPICe' in a white, sans-serif font on a dark purple background.The text 'The Information Centre' and 'An t-Ionad Fiosrachaidh' in white, sans-serif font on a dark blue background.

## Briefing for the Citizen Participation and Public Petitions Committee on PE1967: Protect Loch Lomond's Atlantic oakwood shoreline by implementing the High Road option for the A82 upgrade between Tarbet and Inverarnan, submitted by John Urquhart on behalf of Helensburgh and District Access Trust and The Friends of Loch Lomond and The Trossachs

### Background

- Transport Scotland is leading work on a project to upgrade the 10.6 mile long section of the [A82 trunk road between Tarbet and Inverarnan](#), which runs along the west bank of Loch Lomond and the River Falloch.
- This project was identified as a priority for investment in the [first Strategic Transport Projects Review](#) (STPR), published by Transport Scotland in October 2009.
- The STPR was completed using the [Scottish Transport Appraisal Guidance](#) (STAG), which provides a framework for identifying and assessing potential transport interventions.
- Detailed options for the scheme were then developed and refined using a three-stage process for set out in the [Design Manual for Roads and Bridges](#) (DMRB). The DMRB is used by the four UK administrations in the development of all major strategic road schemes.
- The High Road option favoured by the petitioners was one of three possible route alignments considered as part of the [DMRB Stage 1](#)

[assessment](#). This was rejected in favour of a route largely following the existing A82, which was assessed as offering the greatest benefits of the three options considered.

- Final detailed designs for the proposed scheme design are yet to be published.
- The most significant deviation from the existing route proposed involves routing the road over three viaducts between Inveruglas and Pulpit Rock, which Transport Scotland state will “provide a safer alignment and improve forward visibility compared to the current Seven Bends (Seven Sisters) section of the road”.

## Scottish Government Action

As an agency of the Scottish Government, Transport Scotland is leading the A82 Tarbet – Inverarnan project.

## Scottish Parliament Action

The Scottish Parliament has not previously considered the alignment of any upgrade to the A82 between Tarbet and Inverarnan.

**Alan Rehfisch**  
**Senior Researcher**  
24 October 2022

SPICe research specialists are not able to discuss the content of petition briefings with petitioners or other members of the public. However, if you have any comments on any petition briefing you can email us at [spice@parliament.scot](mailto:spice@parliament.scot)

Every effort is made to ensure that the information contained in petition briefings is correct at the time of publication. Readers should be aware however that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

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## Annexe C

### Transport Scotland submission of 24 October 2022

#### PE1967/A: Protect Loch Lomond's Atlantic oakwood shoreline by implementing the high road option for the A82 upgrade between Tarbet and Inverarnan

I refer to the above noted Petition which is *“Calling on the Scottish Parliament to urge the Scottish Government to reconsider the process for selecting the preferred option for the planned upgrade of the A82 between Tarbet and Inverarnan, and replace the Design Manual for Roads and Bridges (DMRB) based assessment with the more comprehensive Scottish Transport Appraisal Guidance.”*

I can confirm that the development and assessment of the A82 Tarbet to Inverarnan scheme has been undertaken in a manner underpinned by the principles of the Scottish Transport Appraisal Guidance (STAG) and the Design Manual for Roads and Bridges (DMRB).

Targeted interventions to the A82 to improve road standards between Glasgow and Oban/Fort William formed part of the first Strategic Transport Project Review (STPR) from December 2008, which can be viewed on Transport Scotland's website at the following link:

<https://www.transport.gov.scot/our-approach/strategy/strategic-transport-projects-review/>

The STPR was undertaken using an objective-led, evidence-based approach to appraise potential means of addressing transport issues. This approach is compatible with STAG methodology and ensured that the Government's priorities at the time, as set out in the [Scottish Government's Economic Strategy of 2007](#) of a Wealthier and Fairer, Healthier, Safer and Stronger, Smarter and Greener Scotland which underpinned the STPR were met. Investment resulting from the STPR assessment was targeted on those recommendations that most effectively supported improving Scotland's sustainable economic development.

The work undertaken to support the STPR identification of potential interventions for the A82 was consistent with STAG appraisal requirements. The STAG 2008 guidance document, which was current at the time of the DMRB Stage 1 options appraisal process, states at paragraph 1.5.1:

*“All appraisals using STAG must encompass the principles of being objective-led rather than solution-led, present the appraisal of options against the Transport Planning Objectives, STAG Criteria and established policy directives.....STAG should, however, be applied proportionately to the impacts of the issue under consideration. Help and advice is available from Transport Scotland on this frequently misunderstood point to ensure that the appraisal presents the information required by the decision maker in a timely manner that also represents value for money.”*

As part of the early stages of development of the A82 Tarbet to Inverarnan scheme, a verification and validation process complying with STAG was undertaken in order to confirm that the previously identified problems, issues and constraints were still valid.

This process was subsequently supplemented with the DMRB Stage 1 Assessment in order to support the Strategic Business Case for the scheme (March 2014). Appendix B of the Strategic Business Case incorporates the STAG Part 1 Appraisal Summary Tables, which include an assessment of the options against the STAG criteria, namely Environment, Economy, Accessibility and Social Inclusion. The Strategic Business Case is publicly available on Transport Scotland’s website at the following link:

<https://www.transport.gov.scot/media/51175/strategic-business-case.pdf>

The options appraisal process for the A82 Tarbet to Inverarnan scheme was completed in 2014 and reported in the Strategic Business Case (May 2014) and the DMRB Stage 1 Scheme Assessment Report (May 2014). The High Road Option which is referenced in the petition was considered during the DMRB Stage 1 route option selection stage. Full details of the assessment of the High Road Route, known as Option 3, are publicly available in of the DMRB Stage 1 Assessment Report which is available on Transport Scotland’s website at the following link:

<https://www.transport.gov.scot/projects/a82-tarbet-to-inverarnan/project-details/#52885>



Transport Scotland is therefore satisfied with the outcomes and conclusions of the DMRB Stage 1 options appraisal process, and has undertaken a significant amount of work since then on the detailed development and assessment of the preferred route option. We further confirm that the principles of STAG were used in the development and assessment of the A82 Tarbet to Inverarnan scheme and we consider that the approach taken was rational and proportionate.

I can advise that detailed development and assessment of the preferred route option for the scheme continues, with a view to publishing draft Orders and the associated Environmental Impact Assessment Report for formal comment in due course. Should members of the public or other stakeholders wish to provide formal comment or objection to the proposed scheme, they will be able to do so during the statutory consultation period which will follow publication of the draft Orders. Future scheme progress will in part depend on the level and nature of comment received following publication of the draft Orders and whether a Public Local Inquiry (PLI) is required to consider objections received. As with any major roads project a PLI is the appropriate forum to consider objections received but not withdrawn and the appointed independent Reporter would require to consider any proposed scheme alternatives put forward by objectors during the statutory consultation period. The Reporter will then consider the evidence as a whole and prepare a report containing their recommendations to the Scottish Ministers.

Delivery of the scheme itself can only commence if the scheme is approved under these statutory procedures and thereafter a timetable for progress can be set in line with available budgets.

I hope this is of assistance.

## Annexe D

### Petitioner submission of 2 November 2022

#### PE1967/B: Protect Loch Lomond's Atlantic oakwood shoreline by implementing the high road option for the A82 upgrade between Tarbet and Inverarnan

We are writing this rebuttal to correct mis-information by Transport Scotland that they have appraised the A82 using the Scottish Transport Appraisal methodology **as legally required**.

The Design Manual for Roads and Bridges (DMRB) is exactly what it says - a collection of papers defining how road engineers should build everything from a culvert to a viaduct. It includes, inter alia, sections on how to appraise different solutions to technical problems. In contrast, STAG emerged from the economists' attempts to compare projects using Cost-Benefit Analysis (COBA). Famous examples are the costs and benefits of building the Jubilee Line in London, and the "best" location of the Third London Airport. Of particular interest in Scotland is a comparison of the costs and benefits of a 2 lane as opposed to a 3 lane M74. This analysis is important because it included the increased costs of congestion of the two-lane option during closure for accidents and maintenance. In the case of the A82 a STAG/COBA analysis should have included these. The basic principle of STAG is that, if impact is likely to be significant at a specific location, it must be included in the analysis. **The DMRB analysis submitted completely ignores the serious costs associated with delays and diversions during construction, during maintenance or after serious accidents.**

In the nineties, extending the COBA to include all the impacts in areas like noise, landscape and economic development was seen, by some, as problematic. The decision was therefore made to extend COBA (termed Economic Efficiency) with a structured, common objective appraisal of each impact, using ranking. The result was the STAG methodology.

The M74 extension into Glasgow utilised STAG and, in common with most STAG Appraisals, was jointly undertaken by Transport Scotland and the planning authority, Glasgow City Council. Possibly the most contentious issue was the size (and value) of the economic impact (e.g. additional employment) that would be generated. On the A82 an appraisal was undertaken of the Crianlarich By-Pass using DMRB. Transport Scotland made it clear that the economic impact on the village was not, and should not be, in the appraisal. Clearly this, like all the A82 appraisals, was not conducted using the principles of STAG or its methodology. DMRB is not incompatible with STAG, but simply does not cover all aspects considered relevant to those involved.

It is clear the A82 Inverarnan to Tarbet is a very expensive project with potentially huge impacts on the National Park. It will be the biggest item of capital expenditure in the National Park to date and will probably be the biggest in the century. We would have expected a fully comprehensive STAG based appraisal of alternative routes, possibly jointly undertaken with the Planning Authority, as legally required. Instead, what we have for the High Road is a sketchy plan which shows no tunnels. This presumably was the basis for a back of the envelope spreadsheet costing, but with 3 tunnels! These in turn were charged in excess of the most expensive of the tunnels for Crossrail.

The costing also included some £3m for a cycle route **that would not be required**. The benefits to the citizens of Tarbet and Ardlui are ignored as are the benefits of a second route north. There is no analysis at all of the opportunities for tourism and recreational development associated with increased parking and camping opportunities once the busy trunk road has been removed from the shoreside.

On the shore route, the costing does not include the costs of the disruption during construction and maintenance. It has a gross underestimate of the cost of the cycle path to be constructed to DMRB standards (not shown on the plans) which will either need an additional 12m cantilever on the viaduct or a series of underpasses where it crosses the road. Discussion of the environmental impacts are cursory and inaccurate. The “objective” assessment of many of these issues will be an embarrassment to any Transport Scotland official facing a planning inquiry, being the personal opinions of Transport Scotland staff

and consultants in a closed “Value for Money” seminar. It can be seen from some of the comments that on some issues such as noise impacts, at least one participant was ill-informed and not corrected and the well known water/air boundary effect on sound transmission was completely ignored, as was the exceptional heritage value of the shore zone, eg in relation to the presence of the historic General Caulfield’s military road.

This petition asks Holyrood to require the appraisal of both High Road and Shoreside options by consulting widely and using all the facts and all aspects of the STAG methodology. The contention by Transport Scotland that this has been done is simply untrue.

## Petitioner submission of 10 November 2022

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

I would like to draw the Committee’s attention to the new A9 at Killiecrankie, a location which is in many ways analogous to Loch Lomondside between Tarbet and Inverarnan. The new road has been constructed on a viaduct above the ancient woodland, railway and the old road. The old road now only carries local traffic and gives access to the walking trails along the gorge. The new A9 bypasses both Pitlochry and Killiecrankie. The view of the gorge from the new road is stupendous: <https://threelochsway.co.uk/news/article/trust-petition-scottish-parliament-re-a82-upgrade/>

#### **Additional note based on an analysis of plans and figures issued by Transport Scotland**

There are no tunnels identified on the plan, but there are 3 tunnels on the [costing spreadsheet](#). Each of these tunnels has been costed at £50m+44% (£72m per km) whilst the norm is actually £30m per km. This alone increases the cost of the High Road by £146.55m (43.2, 24.5 and 78.85).

The 200m long viaduct across the Inveruglas Water has been costed at just under £50m (49.8) ie, £250m per km. The Transport Scotland documentation costs the viaducts over water at £22.5m per km, less than 10% of the cost proposed for the viaduct over land. That would put the cost of the Inveruglas water crossing at £5m i.e. reduce the costs by £45m and reduces the overall cost to £173m, (364-147-45) less than the cost of the shoreside route (£185m).

For something else which requires no civil engineering knowledge, the cost of a cycle track has erroneously been added to the High Road when it is simply not required as the old road would become the cycle track.

Clearly there is something wrong with these figures. Common sense suggests **the construction costs of the two alternatives would be similar** and the benefits of the High Road in terms of no construction related delays and benefits to the environment would be huge. At the very least the two should be examined properly.