

Transport Scotland submission of 6 February 2023

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

I refer to your letter of 9 January 2023 relating 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 note that there are three specific points which the Committee requires responses to and I will address these as follows:

Copy of the STAG Assessment that was undertaken

As confirmed in my letter dated 24 October 2022, 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). My letter also provided links to two reports which are publicly available on the Transport Scotland website which document the strategic assessment process and the outcomes:

A82 Tarbet to Inverarnan Upgrade, Strategic Business Case, 2014

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

A82 Tarbet to Inverarnan Upgrade, DMRB Stage 1 Assessment Report, 2014

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

While a separate STAG Report was not prepared, the A82 Tarbet to Inverarnan Strategic Business Case (SBC) aligns with the STAG Pre-Appraisal and Part 1 reporting and the DMRB Stage 1 Assessment Report aligns with STAG Part 2. Appendix B of the SBC 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 SBC Page 7, Section 1.1 states:-

"The Strategic Transport Projects Review (STPR) effectively provides a high-level Strategic Business Case for all 29 interventions set out in the STPR, including the A82 route.

As the final report of the STPR was published in October 2009, an early stage of the current commission is to prepare a Strategic Business Case (SBC) for the A82 Tarbet to Inverarnan Upgrade scheme that sets out a high-level assessment and re confirms justification for implementing significant road improvements on this section of the A82.

...early discussions with Transport Scotland have concluded that previous preliminary assessment work undertaken to support the STPR identification of potential interventions for the A82 was consistent with STAG appraisal requirements and there is no need, therefore, to undertake a further full STAG appraisal for the Tarbet to Inverarnan section of the A82.

It is considered more appropriate that a verification and validation is undertaken, complying with STAG, to confirm previous problems, issues and constraints are still valid, in order to support a SBC for the scheme.”

Section 4 of the SBC summarises the initial stage of the ‘STAG verification’; confirming that previously identified problems, constraints and drivers for change on A82 Tarbet to Inverarnan, as identified via the previous studies including STPR 2008 (<https://www.transport.gov.scot/our-approach/strategy/strategic-transport-projects-review/>), were still present and valid.

In addition to the sub-standard route geometry, lay-by and accident rate issues identified in SBC Section 2, it also notes that the A82 lacks footpath/ cycleway connections, accessibility for non-motorised users (NMU) is poor, including for public transport, and bus users in particular.

When considered in combination, the descriptive content in SBC Sections 2, 3 and 4 aligns with STAG Pre-Appraisal requirements on Analysis of Problems and Opportunities.

Section 5 of the SBC aligns with STAG Pre-Appraisal requirements on Objective Setting and Section 6 aligns with STAG Pre-Appraisal requirements on Option Generation, Sifting and Development. Section 6.6 concludes by recommending the three corridor options emerging from the STAG Part 1 Appraisal which were taken forward to DMRB Stage 1 Assessment. The STAG Part 1 Appraisal Summary Tables are included as Appendix B of the SBC.

The Committee may be interested to note that concerns regarding the application of STAG guidance on the Tarbet to Inverarnan Scheme were raised separately with Audit Scotland in similar terms to those put forward in the petition. Audit Scotland investigated and confirmed to Transport Scotland on 15 November 2022 that they had considered the requirements contained in the STAG guidance and reviewed relevant evidence, and the auditor concluded that the STAG process has been applied. The outcome of the investigation confirmed:

- Transport Scotland carried out an initial STAG assessment before adopting DMRB.

- As part of DMRB stage 2, Transport Scotland considered various options before identifying a preferred option.
- Public consultation events were undertaken as part of DMRB stages 1 and 2. Members of the public will also be able to raise concerns at future stages of the project.
- High level costings have been done for tunnelling and cycle paths, with more detailed work to follow. Audit Scotland confirmed that they believed this to be a reasonable approach.

Methodology used to calculate the costs and benefits of each route option

The methodology used for the Traffic and Economic Appraisal of each route option is summarised in Section 7 of the SBC and Section 6 of the DMRB Stage 1 Assessment Report. As noted above, this aligns with a STAG Part 2 Appraisal.

The methodology used to determine the Transport and Economic Efficiency (TEE) was undertaken in accordance with the STAG 2008 guidance that was in use at the time of the appraisal. This involved the development of a NESAs (Network Evaluation from Surveys and Assignment) model supported by a QUADRO (Queues and Delays at Roadworks) model.

The NESAs model was developed to compare the costs and road user benefits of the proposed improvements; and the QUADRO model was developed to examine the delays and costs associated with the construction works and future road maintenance requirements.

Section 4.7 of the STAG 2008 Guidance describes the factors to be considered in evaluating the Cost to Government for a Part 2 Appraisal. The Cost to Government refers to all costs incurred by the public sector as a whole, and includes investment costs, operating and maintenance costs and taxation impacts. Investment costs presented should also be adjusted for Optimism Bias.

In terms of the methodology used to calculate the construction costs for the route corridor assessment, Section 3.1 of the DMRB Stage 1 report for the A82 Tarmachan to Inverarnan scheme describes the three route corridor options selected for Stage 1 assessment and notes that “preliminary route alignments have been identified within each of these corridors . . . to assist with early consideration and appreciation of possible engineering issues within each corridor and also for initial cost estimating purposes.”

The outline cost estimates for the three route corridors (described in section 3.2 of the DMRB Stage 1 Report) were estimated by applying a cost rate per kilometre which reflected the existing conditions and the anticipated engineering solution for discreet sections of each route corridor.

The rates per kilometre were derived by considering the scheme cost for a number of similar Transport Scotland road projects. Where route corridor options included sections that would require additional engineering solutions such as the diversion

of high voltage power lines or more complicated structures or tunnels etc, the cost estimate applied additional rates to those derived from the table of historic project costs.

The total scheme cost estimates included construction costs, land and property costs, preparation and supervision costs and were adjusted for Optimism Bias in accordance with STAG guidance. In addition, to provide a more complete assessment of the economic impact of the Corridor Options over a 60-year period, the QUADRO assessment considered the works costs and road user costs associated with undertaking a programme of future maintenance for the reference case and the Corridor Options.

It is worth noting that while the assessment for the 'high road' option included the capital cost for that option and the 60-year operation and maintenance costs for the both the new road and the existing A82, there was no consideration given to the future status and use of the existing A82 in the event that a High Road alternative was constructed and no cost allowance for de-trunking it or for making any improvements to it prior to being handed over to the local authority.

Community Engagement

Design and assessment work on the project commenced in 2013 considering route corridors which concluded in 2014. During this period, the project team contacted the following stakeholders:

- A82 Partnership – an umbrella group campaigning for upgrading of the A82
- Chambers of Commerce (Fort William, Lochaber, Mid Argyll)
- Community Councils (Arrochar & Tarbet, Strathfillan)
- Council Authorities (Highland, Stirling, Argyll and Bute)
- Emergency Services
- Forestry Commission Scotland (FCS)
- Freight and Haulage Associations (Scotland and Northern Ireland)
- Highlands and Islands Transport Partnership (HITRANS)
- LLTNPA
- Network Rail (NR)
- Landowners and businesses along this section of the A82
- Scottish Environment Protection Agency (SEPA)
- Scottish Natural Heritage (SNH)
- Scottish Rights of Way and Access Society
- Sustrans – A charity promoting safe walking and cycling
- Friends of Loch Lomond and the Trossachs – an independent conservation and heritage charity
- Scottish Wildlife Trust
- Royal Society for the Protection of Birds (RSPB)
- AA / RAC
- Members of the Scottish Parliament (MSPs) and Argyll and Bute Councillors for Lomond North (three councillors)

- Utility suppliers (Scottish Gas Networks, Scottish Power, Scottish Water, Scottish and Southern Energy, and British Telecom).

A letter was issued to these stakeholders in 2013 which provided introductory information about the project commencement. This process also served to provide an opportunity to invite stakeholders to identify key contact(s) and supply relevant information/data, as appropriate.

Two consultation workshops took place during the period covered by the STAG verification and validation exercise and DMRB Stage 1.

An Inception Workshop took place on 28 June 2013 and was attended by representatives from the Loch Lomond and Trossachs National Park Authority (LLTNPA), Transport Scotland and our technical advisors. The purpose of this workshop was to consider the various aspirations for the section of the A82 between Tarbet and Inverarnan and to identify the constraints, issues and opportunities that exist that can be addressed or incorporated during the scheme development.

A Stakeholder Forum Workshop was held on 2 October 2013. The list of attendees and those who were invited but could not attend is included as Annex A to this letter. The workshop covered the following topics:

1. A82 Problem validation, issues and constraints;
2. Objective Setting; and
3. Corridor Improvement Options.

The Strategic Business Case report describes how the feedback from the Stakeholder Workshop was taken into account during the development of the Transport Planning Objectives for the scheme (SBC Section 5). It also describes how the 'Long List' of 11 route corridor options were discussed and agreed through Stakeholder Workshop for consideration as part of the Corridor Options Appraisal. This included as option 11 the "High Road" option described as "An alignment to the west and about the existing A82 corridor following some existing farm tracks and forestry routes with tunnels and viaducts."

Following the workshop, the project team undertook an initial sift of these 11 route corridor options and selected 7 to be taken forward to the Corridor Options Appraisal using the Appraisal Summary Tables encompassing elements of both STAG and DMRB. The was consistent with a STAG Part 1 Appraisal.

The next Stakeholder Forum Workshop was held on 29 May 2014. At this workshop, Transport Scotland and our technical advisors presented the outcome from the Stage 1 decision to the stakeholders and answered questions. The list of attendees and those who were invited but could not attend is included as Annex A to this letter.

During DMRB Stage 2 from April 2014 to September 2015, stakeholder consultation continued with the following stakeholders: LLTNPA, Argyll & Bute Council, Stirling Council, SEPA, SNH, HITRANS and BEAR Scotland, culminating with a series of public exhibitions held at the venues noted below.

Date	Time	Venue
Wednesday 30 th September 2015	12 noon – 7pm	Three Villages Hall, Arrochar, Argyll & Bute, G83 7AB
Friday 2 nd October 2015	2pm – 7pm	Kilmore & Oban Parish Church Centre, Glencruitten Road, Oban, Argyll, PA34 4DN
Thursday 1 st October 2015	12 noon – 7pm	Crianlarich Village Hall, Main Street, Crianlarich, Perthshire, FK20 8QN
Tuesday 6 th October 2015	12 noon – 7pm	Duncansburgh MacIntosh Church Hall, The Parade, Fort William, Inverness-shire, PH33 6BA

Throughout our stakeholder and community engagement Transport Scotland and our technical advisors have received feedback on the emerging proposals which has informed the development and assessment of the proposed scheme. In particular, as a direct result of Stakeholder feedback at the workshop in October 2013, Transport Scotland included consideration of the “high road” alternative as option 11 as part of the route corridor option assessment.

Following completion of the route options assessment process and identification of the preferred route option, Transport Scotland has continued to engage with members of the public and other stakeholders throughout the further development and assessment of the proposed scheme. The design work for the scheme is continuing, and Transport Scotland undertook a consultation exercise towards the end of 2021 to provide updated information regarding the scheme and to keep the public informed of progress. Transport Scotland is considering all feedback received as part of this vital stakeholder and community engagement exercise.

As advised in my letter of 24 October 2022, the 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.

ANNEX A

A82 Stakeholder Forum, 2 October 2013

List of Attendees:

- Arrochar and Tarbet Community Council
- Halcrow Fairhurst JV
- Historic Scotland
- HITRANS
- Loch Lomond and Trossachs National Park Authority
- Police Scotland
- Road Haulage Association
- SEPA
- SNH
- The A82 Partnership
- The Highland Council

The following organizations were also invited but were unable to attend:

- Argyll and Bute Council
- BEAR Scotland Limited
- Forestry Commission Scotland
- Fort William and District Chamber of Commerce
- Freight Transport Association
- Loch Lomond Association
- Loch Lomond Bat Group
- Loch Lomond Fisheries Trust
- Mid Argyll Chamber of Commerce
- Network Rail
- Scottish Ambulance Service
- Scottish and Southern Energy
- Scottish Citylink Coaches
- Scottish Enterprise
- Scottish Fire and Rescue
- Scottish Wildlife Trust
- Strathfillan Community Council
- SUSTRANS
- The National Trust for Scotland
- Visit Scotland
- West of Scotland Archaeological Service

A82 Stakeholder Forum, 29 May 2014

List of Attendees:

- Argyll and Bute Council
- Arrochar and Tarbet Community Council
- Forestry Commission Scotland
- Highlands and Islands Enterprise
- HITRANS
- Loch Lomond and Trossachs National Park Authority
- Police Scotland
- Road Haulage Association
- RSPB
- Scottish and Southern Energy
- Scottish Enterprise
- Scottish Fire and Rescue
- The A82 Partnership
- The Highland Council

The following organizations were also invited but were unable to attend:

- Arrochar and Tarbet Community Group
- BEAR Scotland Limited
- BT Openreach
- Cycling Scotland
- Fort William and District Chamber of Commerce
- Freight Transport Association
- Friends of Loch Lomond & The Trossachs
- Historic Scotland
- Loch Lomond Tourist Board
- Lomond and Forth Valley LEADER
- Mid Argyll Chamber of Commerce
- Network Rail
- Scotia Gas Networks
- Scotrail
- Scottish Ambulance Service
- Scottish Citylink Coaches
- Scottish Power Energy Networks
- Scottish Water
- SEPA
- SNH
- Stirling Council
- Strathfillan Community Council
- SUSTRANS
- The National Trust for Scotland
- Visit Scotland
- West Coast Motors
- West of Scotland Archaeological Service