

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

Petitioner written submission, 19 March 2025

STAG and DMRB

1. Background

We are demanding Transport for Scotland conducts a full STAG Appraisal of the A82 Tarbet to Inverarnan Project as required by Law. This request has been agreed by the Committee but has been rejected by the responsible Minister on the grounds that an equivalent/comparable analysis has already been undertaken. The petitioners dispute that the DMRB based studies are compatible with Scottish Transport Appraisal Guidance (STAG) approach, which has a much broader scope including impacts that are of particular significance for such a huge infrastructure investment in the heart of the National Park. As an example, the TEE (Transport Economic Efficiency) is a key metric in a DMRB based appraisal but STAG (as opposed to the DMRB) also requires consideration of the Wider Economic Impact. The petitioners believe there will be a significant impact on local tourism if the High Route is chosen over the Shore Route, and argue that it must be part of the appraisal to comply with the law and ensure a robust decision.

STAG also requires a two stage Appraisal; a comprehensive Preliminary Options Appraisal and a second stage Detailed Appraisal. Where a route is clearly inferior on all grounds, then it can be excluded at the Preliminary Stage (as with the Glen Loin route) but otherwise all routes should be appraised in detail. Specifically, "For each rejected option there should be discussion of its performance against the Transport Planning Objectives and any other reason for rejection". No reasons for the rejection of the High Route have been given other than back of the envelope calculations of cost (which can be shown to be hopelessly biased and erroneous).

It seems unlikely that Members or Ministers will have read [the Scottish Transport Appraisal Guidance](#) and even less likely that they will have studied the [Technical Guidance](#), which covers areas like the costs associated with unreliability or frustration. Below we show the difference in scope between STAG and DMRB and the need, both legally and for good decision making, to carry out a STAG based Appraisal.

2. Extracts from STAG Guidance

"1.2 When Should STAG be Used?"

An appraisal using STAG is required whenever Scottish Government funding, support or approval is needed to change the transport system. It may also offer a suitable framework for other funders.

1.3 STAG and the Place Principle

The Place Principle is an approach to change based on a shared understanding of what a particular place is for and what it wants to become. **It aims to ensure investment is people and community focussed** [*emphasis added*].

1.4 How does STAG Fit with Other Transport Assessment Guidance?

STAG is applicable to all transport interventions, regardless of the transport modes affected.

2.2 Key concepts

- **Objective-led rather than solution-led**

An objective-led process avoids pre-conceived solutions. Appraisals are expected to explore location-specific problems and opportunities, set objectives, and demonstrate how options perform against them.

- **Evidence-based**

The foundation of all appraisals is a clear evidence base.

- **Collaborative**

- **Proportionate**

- **Does not prioritise between options**

...it is important that the appraisal outcomes are revisited ...

3.2 Problems and Opportunities

Location-specific **problems or opportunities** should be the rationale for any appraisal. [*emphasis added*].

... should identify problems and opportunities for specific groups of people, such as those with disabilities, women, and young people.

3.5 Participation and Engagement

Your appraisal will need effective participation and engagement to demonstrate to decision makers the impact of problems and opportunities on people and businesses in the study area.”

Our comment: real participation and engagement has never occurred.

“4.1 Option Generation

You will need to refer to both the Sustainable Travel Hierarchy and the Sustainable Investment Hierarchy when identifying options.”

STAG Criteria

Environment

The Environment criterion includes eight sub-criteria,

- Biodiversity and Habitats
- Geology and Soils
- Land Use (including Agriculture and Forestry)
- Water, Drainage and Flooding
- Air Quality
- Historic Environment
- Landscape
- Noise and Vibration

Climate Change

The Climate Change Criterion comprises three sub-criteria:

- Greenhouse Gas Emissions
- Vulnerability to the Effects of Climate Change
- Potential to Adapt to the Effects of Climate Change

Health, Safety and Wellbeing

The Health, Safety and Wellbeing Criterion comprises four sub-criteria:

- Accidents
- Security
- Health Outcomes
- Access to Health and Wellbeing Infrastructure
- Visual Amenity

Economy

The Economy Criterion has two sub-criteria, which together should summarise the full extent of economic impacts.

- Transport Economic Efficiency (TEE) covers the benefits ordinarily captured by standard cost-benefit analysis – including traffic volumes, journey times, user frustration or travel time reliability
- Wider Economic Impacts (WEIs) refer to any economic impacts which are additional to transport user benefits. How might the option help attract new jobs, help existing businesses, open up appropriate land for development?

Appraisals have traditionally focussed on the TEE assessment with less emphasis placed on WEIs. To ensure an effective economic assessment, both should be addressed.

Equality and Accessibility

The Equality and Accessibility criterion includes five sub-criteria.

- Public Transport Network Coverage
- Active Travel Network Coverage
- Comparative Access by People Group
- Comparative Access by Geographic Location
- Affordability

For each rejected option there should be discussion of its performance against the Transport Planning Objectives and any other reason for rejection.”

3. Failure to comply with the law

Transport Scotland believe the A82 project is a series of road straightening and widening engineering tasks. The reality is that it as a major project that will define the future of north Loch Lomond for generations to come. It is conceivable that a difference in estimated costs will not be balanced by the size of the undoubted benefits of the High Route and we are insistent this must be tested properly in line with the legal requirements, including taking into account the National Park’s newly announced “Future Nature Landscape Connections Initiative” as it relates to the need to preserve the beautiful loch shore as an essential landscape connection in terms of its cultural, recreational, and economic significance, as well as its ecological role as a wildlife corridor and ecotone vital for the preservation and promotion of biodiversity.

We note that without any promotion whatsoever, the petition continues to gather support and now stands at 904 signatures.