

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.