

# Minister for Transport submission of 30 June 2023

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

Thank you for your letter of 19 May 2023 regarding the A82 Tarbet to Inverarnan Scheme following the Citizen Participation and Public Petitions Committee meeting of 17 May 2023.

By way of background, I thought it may be helpful to the Committee to advise that the Scottish Transport Appraisal Guidance (STAG) sets out a structure and methodology for assessing potential transport interventions. STAG involves the appraisal of generated interventions which could potentially address identified problems and opportunities against a range of criteria and provides a key part of the Strategic Business Case for options taken forward. STAG is part of a transport related Business Case. Specifically, STAG aligns with a Strategic Business Case (SBC) for interventions.

STAG is applicable to all transport interventions, regardless of the transport modes affected. Certain proposals which emerge from the STAG process may then require mode-specific transport guidance which, in the case of road schemes, requires the application of the Design Manual for Roads and Bridges (DMRB).

Transport Scotland provided a detailed submission to the Committee of 6 February 2023 setting out how the development and assessment of the A82 Tarbet to Inverarnan scheme has been undertaken in accordance with STAG and DMRB. The submission also provided links to the following two reports which document the strategic assessment process and 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>

Transport Scotland's submission identified how these two reports provide the STAG reporting on: Analysis of Problems and Opportunities; Objective Setting; Option Generation, Sifting and Development; and Option Appraisal using the STAG Part 1 Appraisal Summary Tables. As the Committee is aware from Transport Scotland's submission, concerns regarding the application of STAG guidance on the A82 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.

As a result, the Scottish Government considers that a STAG-compliant assessment has already been completed in line with the appropriate guidance and is therefore not willing to carry out a re-appraisal of the preferred route option for the upgrade to the A82 between Tarbet and Inverarnan. This would unnecessarily repeat work already carried out resulting in considerable delay and additional cost that would not provide any value to the Scottish taxpayer.

In your letter, you highlight the environmental concerns raised by the Loch Lomond and The Trossachs National Park Authority about the design of the preferred route option in their submission of 6 February 2023. It is also noted that the submission provided observations about the very significant engineering and environmental issues that would need to be resolved for the Petitioners' alternative high-level route.

The sensitive landscape of the National Park is taken very seriously by Transport Scotland which has consulted extensively with the National Park Authority throughout the development of the proposed scheme. It is recognised that upgrading the road in this environment is challenging, and this consultation is very helpful in understanding their concerns. I would like to reassure the Committee that Transport Scotland will continue to work closely with the National Park Authority, and this is a key part of the ongoing design and assessment work that needs to be concluded before it will be possible to progress the necessary statutory authorisation processes including the publication of draft Orders, Environmental Impact Assessment Report and the accompanying public consultation.

Transport Scotland has considered the petitioner's alternative proposal and notes from inspection it is clear that the proposed route alignment would have considerable engineering and environmental issues including increased detrimental effects on Ancient Woodland Inventory areas when compared to the preferred route option. The proposal does not acknowledge that the existing A82 would require to remain in place to provide continued access to land, property and tourist facilities and therefore the existing substandard route would require to continue to operate without vital improvements to address road safety and resilience issues. Additionally, it is noted that the petitioner's proposal would not allow for the existing route to be repurposed to active travel for the above reasons and therefore it would not deliver upon a key objective of the A82 Tarmachan to Inverarnan scheme. The Scottish Government does not consider this option to be a viable alternative to the preferred route option and notes that it has rightly been discounted from further consideration having followed appropriate due process.

While there is a lot of development work still to be undertaken, which is being informed by our enhanced understanding of the specific complexities associated with improving this iconic route, the Scottish Government continues to push forward the preparation stages to conclude the detailed development and assessment process for this vital improvement scheme in advance of publication of draft Orders.

As set out in Transport Scotland's submission to the Committee of 6 February 2023, I confirm that members of the public or other stakeholders will have the opportunity to provide formal comment or objection to the proposed scheme during the statutory consultation period which will follow the 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 for determination.

I trust this is of assistance.

**FIONA HYSLOP**

