Citizen Participation and Public Petitions Committee

8th Meeting, 2023 (Session 6), Wednesday 17 May 2023

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

Lodged on 18 October 2022

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

PetitionCalling 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 Inveraranan, and
replace the Design Manual for Roads and Bridges (DMRB) based
assessment with the more comprehensive Scottish Transport
Appraisal Guidance.

 Webpage
 https://petitions.parliament.scot/petitions/PE1967

Introduction

- 1. The Committee last considered this petition at its meeting on <u>21 December</u> <u>2022</u>. At that meeting, the Committee agreed to write to Transport Scotland, Argyll and Bute Council, Loch Lomond and the Trossachs National Park Authority, and the Lochaber Chamber of Commerce.
- 2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
- 3. The Committee has received new responses from Loch Lomond and the Trossachs National Park Authority, Transport Scotland, and Argyll and Bute Council, which are set out in **Annexe C**.

- 4. Written submissions received prior to the Committee's last consideration can be found on the <u>petition's webpage</u>.
- 5. Further background information about this petition can be found in the <u>SPICe</u> <u>briefing</u> for this petition.
- 6. The Scottish Government's initial position on this petition can be found on the <u>petition's webpage</u>.
- 7. Every petition collects signatures while it remains under consideration. At the time of writing, 660 signatures have been received on this petition.

Action

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

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 Inveraranan, 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

Extract from Official Report of last consideration of PE1967 on 21 December 2022

The Convener: PE1967 is on protecting Loch Lomond's Atlantic oak wood shoreline by implementing the high-road option for the A82 upgrade between Tarbet and Inverarnan—I am tongue twisted now. The petition, which was lodged by John Urquhart on behalf of Helensburgh and District Access Trust and the Friends of Loch Lomond and the Trossachs, calls 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 to replace the design manual for roads and bridges—the DMRB—based assessment with the more comprehensive Scottish transport appraisal guidance.

I am delighted that we are joined by Jackie Baillie for our proceedings on another nature-related petition, as it happens.

Jackie Baillie (Dumbarton) (Lab): Absolutely; I make clear that I am nothing to do with NatureScot, if that pleases the committee.

The Convener: On that basis alone, we welcome you to our proceedings.

The petitioners tell us that they have engaged in a campaign to inform officials, politicians and the wider public about the issues that are posed by the proposal to upgrade the A82 between Tarbet and Inverarnan, and have highlighted what they view as the advantages of pursuing the high-road option.

In response to the petition, Transport Scotland has outlined the process that was undertaken to assess the options and identify its preferred option to improve road standards on the A82. Transport Scotland considered that the approach that it has taken is rational and proportionate, and has confirmed that detailed development and assessment of the preferred route option is on-going.

The petitioners have responded to the information provided by Transport Scotland, highlighting concerns that the route analysis that was undertaken appears not to have followed the STAG assessment framework and has ignored costs associated with delays and diversions during construction, maintenance and after serious accidents.

The petitioners also note the approaches that have been taken to other road infrastructure projects, such as the M74 extension in Glasgow and the A9 upgrade at Killiecrankie, as positive examples of where the economic and environment impacts were more fully explored during the appraisal process.

Before we open this up for discussion, I ask Jackie Baillie whether she would like to contribute her thoughts in support of the petition.

Jackie Baillie: I thank the convener and committee members for allowing me to speak. I am joined by the petitioners; they are in the public gallery, so I am sure that, if I get anything wrong, they will be passing me notes.

As you rightly point out, at the heart of the issue is the replacement of the A82 between Inverarnan and Tarbet, much of which runs through my constituency. As you rightly highlight, the problem is that the design was undertaken using the design manual for roads and bridges rather than the more formal and more comprehensive STAG process, which we are all used to.

The context is important, because it will be the key capital expenditure in the national park. It is probably the biggest project of its kind and the most significant. Over the years, the Helensburgh and District Access Trust has worked with the national park to develop paths and walkways throughout some of our most iconic countryside. For example, they have developed the three lochs way, which runs from Balloch to Inveruglas and is one of the great Scottish trails. The hope is that we might be able to join it up with Ardlui and create a round-the-loch trail. The potential is enormous, but I do not need to remind any of you—I am sure that you have all visited Loch Lomond—of the heritage of the area and of what an outstanding environment it is. I believe that it is the most beautiful part of Scotland, but I am biased.

Transport Scotland has simply ignored the idea of giving consideration to an alternative option rather than just pushing ahead with the existing road. It has not considered that to the extent that we think possible. If we adopted a high-road option, rather than the existing route, we would protect oak woods and preserve the shoreline, we would have a walking and cycling route on the old road, and people would be able to access that northern part by foot to see some of the forest and woodland on the shoreline. We would have a great walking trail, the road safety issues at Arrochar primary school would be resolved, and we would have a faster and more direct route. All those benefits seem to have been ignored by the appraisal process.

That is a real opportunity but, when you look closer at this, it looks as though the appraisal of the shoreline route—the existing route—and the high route was not done in an unbiased manner. For example, not that I would know much about this, convener—I am sure that you do—but three tunnels were proposed and were costed, whereas no tunnels are required or appear on the diagrams and plans. The three tunnels that do not exist were costed at £90 million per kilometre, whereas PricewaterhouseCoopers estimates that cost to be £30 million per kilometre. I hesitate to say this, but it looks as though somebody was trying to stack the consideration against the alternative route so that they could stick to their

engineering plans as they stood. That inflated the cost by £146.55 million. It is unrealistic to suggest that these costs match in some way.

There was insufficient consultation with the local community, and the groups behind the petition, including Friends of Loch Lomond and the Trossachs, were not consulted. They have had to dig away to find out that information. We have a oncein-a-lifetime opportunity to get this right. I understand the frustration of engineers who just want to get on and build the road on its current configurations. I have to say that that would cause traffic chaos, and the opportunity for a new route absolutely needs to be grabbed.

I know that the committee likes to get out of Holyrood, so may I invite you all to visit the area? We will walk you round the route and the potential options. However, you might also want to consider taking evidence from Transport Scotland; from the national park authority, which has a significant say in the matter; and from the minister, because our judgment is that there has been no political oversight of the issue. We have an opportunity to do the right thing, and if the committee suggested a STAG appraisal, we are confident that the high road would emerge as the preferred option.

The Convener: Thank you. You have outlined circumstances that are familiar to us in our consideration of petitions on many and diverse issues.

Colleagues, we have a bit of work ahead of us in relation to the petition, and some of Miss Baillie's suggestions might figure at another stage as we go along the route. It might even be that we come and visit. There is no election campaign in the immediate future for us to come and participate in, but it would probably be quite useful to have a look at some stage.

I ask colleagues how they think that we might take things forward.

Paul Sweeney: I support the proposal that we carry out a further inquiry into the matter. It is a broader national consideration as well, because I know—certainly from previous representations that I have had from Railfuture Scotland—that there is a deep concern that Transport Scotland is attitudinally predisposed to heavily overengineering solutions for trunk-road building, and that it has an attitudinal dislike of rail development. It will, for example, overly analyse and put onerous requirements on rail programmes but will take forward elaborate schemes for trunk-road construction.

There is a general consideration with regard to how transparent Transport Scotland is in developing such projects, and a broader national consideration about policy and how accountable the agency is. In this particular instance, there is deep concern about the coastal route along Loch Lomond side being damaged.

I am mindful that Sir Robert Grieve, who, along with Tom Weir, was one of the masterminds of the national park project back in the 1970s, said that he did not want

the area to end up like the Italian lakes, built up from end to end. It would be a real travesty if the project were to go ahead and destroy the spirit in which the national park was created.

The Convener: You are not as young as you look, Mr Sweeney.

Paul Sweeney: I am just a fan of "Weir's Way"-that is all.

The Convener: Was there a proposal for us in there? I know that you support the petition.

Paul Sweeney: We should go forward with the proposal and invite Transport Scotland to make representations on the process that it has followed. We might also want to pursue a site visit.

The Convener: We can perhaps ask for a STAG assessment from Transport Scotland. Are there any other views?

David Torrance: I wonder whether we could write to Argyll and Bute Council and to Loch Lomond and the Trossachs National Park Authority to seek their views on what is planned for the A82.

The Convener: Okay—so we are writing to Transport Scotland on the issues that we have identified, writing to Argyll and Bute Council and writing to Loch Lomond and the Trossachs National Park Authority. Are there any other suggestions?

Fergus Ewing: I have two points. First, I note that Jackie Baillie referred to a PWC report on the cost of the tunnels. I am looking in our papers to see whether there is specific reference to that; perhaps there is, and I have missed it. I would be keen to get more details on that, and copies of the documents, in order to look into the points that Ms Baillie made about the relative costings, which we need to look at carefully.

Secondly, I know from when I formerly represented Lochaber a rather long time ago—when Mr Sweeney was even younger than he currently is—that, among people living in the Oban and Argyll area who are also served by the A82, there is huge support for upgrading the A82 along Loch Lomond side. Sadly, that has been the case for many decades.

I wonder whether, for fairness, we might reach out to the community—perhaps to the chamber of commerce. I know that some individuals in Lochaber and Argyll were involved, because they have strong views about the importance of proceeding with the upgrade of the road.

The Convener: Yes—I think that I saw some engagement from the gallery there, so I suspect that the petitioners will be able to assist us on one or two of those issues, if the clerks wish to liaise further with them.

We are interested in taking forward the issues that the petition raises, and we have identified a fairly comprehensive range of agencies and individuals from whom we will seek further evidence that we can consider in due course. Are members content with that?

Members indicated agreement.

Annexe C

Loch Lomond and The Trossachs National Park Authority submission of 6 February 2023

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

Thank you for seeking the views of Loch Lomond & The Trossachs National Park Authority with respect to this petition.

National Park officers have had a series of discussions and interactions with Transport Scotland and their design team since they began working on this scheme in 2013. This included informal advice on the environmental design principles that should be adopted to deliver environmental and landscape objectives as well as the transport objectives for the scheme. An update on the design was provided to the National Park Authority Board. This is published on our website in the CEO Update paper for the Board meeting of 13 December 2021.¹

Throughout these discussions we have accepted the need to upgrade the road to a better standard and have pushed for a more strategic approach to the project rather than a series of piecemeal upgrades which had been the earlier approach. National Park officers have been providing specialist advice to the design team on a wide range of landscape, habitat, protected species and recreation issues. This has been in the form of technical advice and we provided detailed comments on the draft EIA in a letter of 3 May 2019 setting out our expectation for a design which complements and delivers multiple benefits befitting of a

¹ Note by the Clerk: The paper referred to is available here – see section 4: <u>Agenda</u> <u>Item 8 - CEO update (lochlomond-trossachs.org)</u>.

National Park delivering positive landscape outcomes and an overall biodiversity net gain.

The National Park Authority Board will only be able to take a considered and formal view on the whole scheme once a design has been finalised.

The road design as currently presented raises a number of significant environmental concerns. Given that it is understood that a consultation on formal road orders will be the next stage in the process, I wrote to Transport Scotland on 20 May 2022 highlighting these concerns, particularly with reference to the twin climate and nature crises which I believe heightens their importance. In summary, the main points were:

- Ensuring that the environmental and landscape objectives for the scheme are given greater prominence.
- Ensuring that Access and active travel gains are delivered.
- The extent of land take, woodland habitat loss and rock cut.
- Ensuring effective mitigation and compensation for environmental impacts, particularly in relation to significant native woodland losses, loch shore impacts, rock cut visual impacts and road corridor landscaping.
- Ensuring suitable landscape and architectural considerations of new viaducts, stopping points and other infrastructure.
- Impacts on the viability of farming and other land management along the route corridor.
- The road standards in terms of width and speed being designed for.

If Transport Scotland progress with the design as currently presented to formally consult on road orders then the National Park Authority will have to formally consider its position on the proposal. I have highlighted that whilst it was recognised that preferred scheme is still being finalised, it was becoming clear that without significant change from what has been publicly shared, I was very unlikely to be able to recommend to the Board that the proposal is supported when the National Park Authority is formally consulted. The alternative high-level route proposed by the petitioners is a concept that has not been developed or examined in any detail as far as I am aware. It largely falls in Route Corridor 3 considered by Transport Scotland in the DMRB Stage 1 Assessment. On a very outline examination of the route map put forward by the petitioners it can be reasonably observed that very significant engineering and environmental issues would need to be resolved:

- It contours along very steep hillsides at approximately the 70 m contour and would require significant cut and fill to create the new road, raising potentially significant challenges in relation to visual intrusion and traffic noise, etc.
- It would involve a much larger land-take than the TS proposal because none of it consists of existing road whereas the TS proposal is based on widening an existing road.
- It would go through of ancient woodland for much of its length and significant areas would be lost.
- It would go through the Garabal Hill geological SSSI for approximately 2 km.
- It would cross the West Highland Railway line twice.
- It would cross at least 6 significant water courses and three large side glens
- It would cross the Sloy power station pipes and intersect electricity transmission pylon lines at 4 locations.
- All of these crossings would require significant works. Large bridges or viaducts would appear to be needed to ensure that the road did not have tight bends or steep changes in gradient.

Clearly if this option were to be pursued then the implications and impacts would have to be considered further. Given the overview of design challenges set out above it is not at all obvious that this alternative would be environmentally more favourable than the route taken by the TS proposal. In relation to process, our understanding is that Transport Scotland have been approaching this project using the same DMRB procedure as other road projects we have been involved in, including the A83 at Rest & Be Thankful.

I hope these observations are of assistance to the Committee.

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/projectdetails/#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

(<u>https://www.transport.gov.scot/our-approach/strategy/strategic-</u> <u>transport-projects-review/</u>), 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 NESA (Network Evaluation from Surveys and Assignment) model supported by a QUADRO (Queues and Delays at Roadworks) model.

The NESA 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 Tarbet 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	12 noon –	Three Villages Hall, Arrochar, Argyll &
September 2015	7pm	Bute, G83 7AB
Friday 2nd	2pm –	Kilmore & Oban Parish Church Centre,
October 2015	7pm	Glencruitten Road, Oban, Argyll, PA34 4DN

Thursday 1st October 2015	12 noon – 7pm	Crianlarich Village Hall, Main Street, Crianlarich, Perthshire, FK20 8QN
Tuesday 6th	12 noon –	Duncansburgh MacIntosh Church Hall,
October 2015	7pm	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

Argyll and Bute Council submission of 2 February 2023

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

Transport Scotland and their consultants engaged with Argyll & Bute Council, as the roads authority for the local road network, at various points during the initial consultation phase and, again, after the preferred route had been selected. The Council, as a key stakeholder, is satisfied that reasonable engagement on the 2016 proposal for the A82 occurred between itself and the national authority.

In regards to the preferred option and the process used to select it, the Council is broadly supportive of the approach taken. At present, the Council's main interest concerning the project is as follows:

1. That during the works, appropriate signage alongside a suitable public and stakeholder communication strategy is in place to ensure diversions operate effectively;

- 2. That suitable arrangements are made to ensure that an adequate return to service plan is in place and can be implemented for the A82 should an incident (for example, a landslip or RTC) occur on the A83 which results in a closure to traffic requiring the possible use of the A82 as a diversion;
- 3. That the signage strategy used both during and post construction doesn't create a bypass road to west Argyll but instead actively seeks to encourage visitors to the area.

If you require any further information on this matter please contact [*redacted*].