

Citizen Participation and Public Petitions Committee
Wednesday 27 November 2024
18th Meeting, 2024 (Session 6)

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

Introduction

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

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 Inverarnan, 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>

1. [The Committee last considered this petition at its meeting on 6 March 2024.](#) At that meeting, the Committee agreed to write to the Cabinet Secretary for Transport and Transport Scotland.
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 written submissions from the Cabinet Secretary for Transport and the Petitioner, which are set out in **Annexe C**.
4. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage.](#)
5. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
6. [The Scottish Government gave its initial position on this petition on 24 October 2022.](#)
7. Every petition collects signatures while it remains under consideration. At the time of writing, 766 signatures have been received on this petition.

Action

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

Clerks to the Committee
November 2024

Annexe A: Summary of petition

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

22 September 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 Inverarnan, 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;

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- 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 6 March 2024

The Convener: PE1967, on protecting Loch Lomond's Atlantic oakwood shoreline by implementing the high road option for the A82 upgrade between Tarbet and Inverarnan, was lodged by John Urquhart on behalf of Helensburgh and District Access Trust and the Friends of Loch Lomond and The Trossachs. The petition 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-based assessment with the more comprehensive Scottish transport appraisal guidance.

When we last considered this petition at our meeting on 17 May 2023, we agreed to write to the Minister for Transport, and we also looked at the suggestion made by Jackie Baillie, who joined us at that time, with regard to options for a site visit. We have received a response from the then minister and now Cabinet Secretary for Transport, which refers to previous submissions setting out the development and assessment of the A82 Tarbet to Inverarnan scheme, and the Scottish Government's view that the STAG-compliant assessment has already been completed. The minister states that the Government is not willing to carry out a reappraisal of its preferred route option, as that would repeat work already carried out and would likely lead to considerable delay and additional costs. The minister also notes that Transport Scotland has considered the alternative option put forward by the petitioner, with the Government not considering it as a viable alternative to its preferred option.

The petitioner has commented that the minister's response does not add anything new to the evidence that we have gathered so far, and notes that both route options pose considerable engineering and environmental issues, with the Scottish Government's preferred option requiring the extension of viaducts affecting the tree line and wildlife along the banks of Loch Lomond. However, the petitioner does welcome the minister's assurance that stakeholders will have an opportunity to make formal comment or objection during the statutory consultation period and offers once again to facilitate a visit to the site. The committee has also received a submission from Stuart Corder in support of the petition, which shares concerns about the likely impact of the low road option on local tourist businesses.

I am not certain that a site visit would assist us, given the fairly strong direction that we have received from the Scottish Government. Do colleagues have any comments or suggestions?

Foyso Choudhury: I suggest that we write to the Cabinet Secretary for Transport, seeking further details on the anticipated timetable for progressing the draft road orders and statutory consultation. I would also suggest that Transport Scotland be invited to give evidence on why the STAG appraisal has not been carried out.

The Convener: In the first instance, I would write quite specifically to Transport Scotland on that issue instead of bringing it before the committee. I do not think that we necessarily want to schedule an evidence session on such a narrowly defined point, but I think that we could ask the organisation the question quite directly. There seems to be a difference of view on what has taken place, and I would quite like something that was a bit more definitive.

Fergus Ewing: I respectfully agree that I do not think that a site visit is required or that we should take oral evidence from Transport Scotland. However, there appears to be a slight conflict in the evidence on exactly what analysis Transport Scotland has carried out on the apparent high road option. My impression on rereading the correspondence and submissions is that Transport Scotland has carried out some analytical work on the option and has concluded that it is not practical. I think that clarification of that in a letter would be very useful.

I would also like Transport Scotland to confirm how much a STAG report would cost, how long it would take and whether it thinks that it might delay the project further. Despite the objections that the petitioners have very sincerely set out, the fact is that a far greater number of people on the west coast—in Oban and Fort William—use this route as their link with the world and the Tarbet to Inverarnan stretch is arguably the worst section of an A-road in Scotland. There are routinely accidents, delays, damage to wing mirrors and so on, and I think that many people feel anxious about driving that section, as I did for many years when I represented Lochaber. A huge number of people want the A82 to become a proper road, so, while respecting the petitioner's wishes, I think that it is useful to put that on the record out of a sense of balance.

The Convener: Are we content to proceed on that basis?

Members *indicated agreement.*

The Convener: Mr Ewing, you are showing your age when you talk about wing mirrors—it is more likely to be door mirrors these days. It has been some time since wing mirrors were legal on modern vehicles. Nonetheless, I understood your point.

Annexe C: Written submissions

Cabinet Secretary for Transport written submission, 26 March 2024

PE1967/K: 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 11 March 2024 regarding the A82 Tarbet to Inverarnan Scheme following the Citizen Participation and Public Petitions Committee meeting of 6 March 2024.

As confirmed in my letter of 30 June 2023, there is a lot of development work still to be undertaken on the scheme, which is being informed by our enhanced understanding of the specific complexities associated with improving this iconic route.

I can confirm that the Scottish Government continues to progress the preparation stages to conclude the detailed development and assessment process for this vital improvement scheme in advance of publication of draft Orders. Outstanding work on the scheme includes further engineering development and assessment, the requirement to engage further with those whose property is directly affected by the scheme proposals, additional environmental surveys and associated reporting, preparation of the detailed Environmental Impact Assessment Report, and subsequently the preparation and publication of the necessary statutory Orders. I am not yet able to confirm a detailed timescale for publication of draft Orders and the associated statutory consultation period because progress is dependent on completion of the above stages. However, I would like to reassure you that the Scottish Government will follow the requirements of the statutory process and I again confirm that, in due course, the petitioners will have the opportunity to formally comment on the proposals following publication of draft Orders.

With regard to further detail and clarification on the analysis of both route options, I can advise that this is available to view in the A82 Tarbet to Inverarnan Upgrade, Strategic Business Case, 2014 and A82 Tarbet to Inverarnan Upgrade, DMRB Stage 1 Assessment Report, 2014. The links to these documents were issued to the Committee in previous responses of 6 February 2023 and 30 June 2023 and are quoted below for ease of reference.

- <https://www.transport.gov.scot/media/51175/strategic-business-case.pdf>
- <https://www.transport.gov.scot/projects/a82-tarbet-to-inverarnan/project-details/#52885>

The Committee has also requested information on the estimated costs and time required to repeat work already undertaken and carry out a new STAG appraisal for the A82 Tarbet to Inverarnan corridor.

The STAG framework is described more fully in the STAG Managers Guide at the following link <https://www.transport.gov.scot/publication/scottish-transport-appraisal->

[guidance-managers-guide/](#) and the Committee may wish to refer to this for further information on the framework.

The approach, including associated costs, to a further STAG appraisal of the A82 Tarbet to Inverarnan corridor would need fuller scoping in order to determine the scale of the re-appraisal, but it is estimated that it could take 12-18 months. However, it is important to note that undertaking a new STAG appraisal would return the project to the very start of the process with a fresh analysis of problems and opportunities and revisiting the Transport Planning Objectives. This would be followed by repeating the process of option generation, option sifting, option development and options appraisal. This would result in several years of delay to the scheme and also attract significant additional cost in revisiting the detailed appraisal and subsequent assessment stages already completed. As I set out in my previous submission to the Committee, this would unnecessarily repeat work already carried out and would not provide any value for the Scottish taxpayer.

I trust this is of assistance.

Fiona Hyslop

Petitioner written submission, 7 November 2024

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

We are delighted that our petition is to be considered again by the Committee.

New evidence has emerged with the publication of historian Lynne Pearce's book, 'Journeying Through Britain's Changing Roadscapes' which identifies the road's significance in terms of the human and cultural geography of the area - particularly the road's significance for many people's perception of "place".

Also, Forestry and Land Scotland has recently constructed a new timber extraction road along the line of the proposed "High Road", thereby demonstrating that what we have been suggesting is entirely feasible. Significantly, so far as we are aware, there have been no complaints about the scenic impact of this new road.

Furthermore, the Petitions Committee is still to take up our offer of a guided tour of the area so that they can see first-hand the evidence we have been trying to bring to their attention.

Again, we would remind the Committee that, as the main access from the west of Scotland into the Highlands, the A82 between Inverarnan and Tarbet is one of Scotland's main strategic routes and the closure and delays which would accompany Transport Scotland's widening exercise would have major damaging implications for the local and wider economy. Again, we emphasise that the root of the problem is that a full analysis using the Scottish Transport Appraisal Guidelines (STAG) has never been undertaken (although it is required whenever Scottish Government funding, support or approval is needed to change the transport system). Widening the loch side road using viaducts over the bays and cantilevering along the beautiful

shore would be a major and very costly mistake because destroying a beautiful loch shoreline with concrete walls, pillars and platforms would be completely inappropriate in a National Park. The chance to consolidate and preserve the Oakwoods, survivors of the Temperate Rain Forest, will be lost. The remnants of General Wade's Military Road will finally disappear.

Finally, it was clear to us that the figures in the comparison of high and lochside roads were, at best, back of the envelope guesstimates, many inaccurate, and, even those reasonable when undertaken, are hopelessly out of date now. For example, road traffic forecasts for 2030 were passed last year (2023). Most significantly, the omission of the cycleway from the lochside road costings became even greater last year. The design now requires a 3m carriageway and a 2.5m verge, which for long sections will need to be a concrete platform overhanging the loch. Any existing engineering design will have to be redone to make it applicable. As time has gone on, any costing and design work previously undertaken has become more and more irrelevant.

None of this has been considered in the Appraisal although required by law. Instead Transport Scotland have persisted in arguing that a Strategic Transport Plan published in the last century was directly comparable to a STAG for this route to be built in 2030. This is nonsense!

The request in the petition was to ask the Committee to require Transport Scotland to carry out a STAG Appraisal. The Department appears to have simply refused to undertake that appraisal. At this stage we would therefore now like the Committee to demand that Parliament conduct an inquiry into the issue.