

Alison Hughes, Transport Scotland
Trunk Roads: Infrastructure and Professional Services
Buchanan House
58 Port Dundas Road
Glasgow
G4 0HF

Dear Ms Hughes,

Formal Objections to Aberdeen Western Peripheral Route
Draft Side Road Orders, Reference RYC/G109/13/070-075 inc.
Re-issued Environmental Statement 2007 RYC/G109/33/0701

I wish to register my formal objections to the AWPR draft Side Road Orders and re-issued Environmental Statement. I oppose these orders on the following grounds:

Objections from December 2006 letter

Nothing in the re-issued Environmental Statement has satisfactorily answered any of the points raised in my previous objection letter to the December 2006 draft road orders, nor have any of the bland assurances given in Transport Scotland's response to that objection letter convinced me of the need for this road. The points raised remain unanswered, namely:-

1. The financial costs are high but the benefits are few
2. The route will cause great and irreversible damage to a special rural environment
3. The route will create barriers between local and diverse communities
4. There is no demonstrable need for the Stonehaven-Netherley fast link
5. The route will only remove a very small proportion of heavy vehicular traffic from the city
6. The route will induce additional traffic and create traffic congestion at new locations
7. The route is not part of a co-ordinated multimodal transport package nor does it form part of an integrated transport network
8. The route was promoted without proper regard to due process
9. Members of the public were misled during the March 2005 public consultation exercise
10. There has been a conflict of interest amongst those designing the route
11. The route divides and fragments the green belt.
12. The route will attract development and draw business away from the city.
13. The AWPR has been put forward in advance of the local and regional transport strategies
14. The AWPR is incompatible with global climate change principles.
15. The lives of many are already being blighted by this route
16. The route will lead to an overall increase in the number of accidents

Over the last 10 months or so, nothing has changed of a strategic or local nature for any of the above objections to be removed or resolved. In addition, the following points should be considered part of my objection:-

17. The AWPR is unaffordable

The estimated cost for the AWPR is based on bringing the project to a "design only" stage, rather a "design and build" scenario. The engineering drawings and Environmental Statement (ES) prepared by Jacobs are lacking in sufficient details for the real costs and effects of the road to be calculated, until the project goes out to tender. The procurement of construction works is scheduled to take place in 2009, by which time the public local inquiry will have taken place. No opportunity therefore exists to examine the potential real costs of the road to any meaningful extent. It is therefore imperative that Transport Scotland clarify at this stage what contractor input will be brought forward at the public local inquiry.

18. The AWPR will irreversibly damage the North East's Cultural and Archaeological Heritage

7 Scheduled Ancient Monuments (SAMS), 2 proposed SAMS and 2 listed buildings will be adversely impacted. (ES 2007) The fact that "Where possible, the route of the road has been designed to avoid or reduce direct impacts" just emphasises the importance of the corridor for cultural heritage. This area is one of Aberdeenshire's many "jewels" which should not be destroyed for short-term profit.

19. The AWPR will increase pollution

"Emissions of air pollutants and greenhouse gases are expected to increase as a result of the scheme". (ES 2007) This is either a tacit admission that traffic will increase overall, or an admission that traffic will not be more free-flowing. This contradicts EU, UK, Scottish Executive, Aberdeen Council and Aberdeenshire Council targets to reduce pollution and greenhouse gases.

20. The AWPR Environmental Impact Assessment (EIA) is still incomplete

"The scope and detail of this wider-area mitigation is still being developed" (ES 2007) suggests the EIA is still incomplete, contrary to EU law.

21. The AWPR will act as an ecological barrier and will therefore have a negative impact on climate change and will adversely affect wildlife migration.

“The scheme will act as an ecological barrier” (ES 2007)

SNH’s campaign “The Long March” describes the “thin strip of low ground between the sea at Stonehaven and the upland forests at the eastern margins of the Grampian mountains”, where the AWPR and Fastlink will go, as ALREADY “a pinch point for wildlife migration due to climate change”. The AWPR and Fastlink will make this far worse, harming Scotland’s wildlife and biodiversity, contrary to the Council’s policies on biodiversity and Agenda21.

22. The AWPR increases the risk of flooding

“Within the water environment there will be realignments and culverting of many watercourses throughout the route, leading to adverse changes to the form and composition of watercourses over a wide scale”. (ES 2007) With global warming continuing apace, and after one of the wettest summers on record, it may be that the risk of increased flooding has not been properly taken into account, as per Scottish Executive requirement to local authorities that all new schemes should allow for future climate change and that this should be considered on a site by site basis.

23. Other elements of the Modern Transport System may never be realised

The 2003 NESTRANS report lists a number of possible transport improvements in addition to the AWPR.

The AWPR was costed at £120m at that time, and these other elements in excess of £250m.

As the traffic flows in the EA assume that **all** these other elements are in place, and no indication has been given of the traffic figures with/without the other MTS options so the AWPR marginal effect can be clearly seen, it is impossible to evaluate the scheme as a whole. As the 1998 Scottish Office study found, adding the AWPR may only have a marginal impact on Aberdeen’s traffic. Since then, there have been minimal changes to the traffic scenarios in and around Aberdeen to justify the road.

24. Traffic flow figures

The input data and calibration and validation methods used for the ASAM3 model may be flawed. If this model is not fit for purpose, the whole scheme falls.

25. Alterations in re-issued Environmental Statement

As Transport Scotland have flatly refused to give any indication of the changes between the December 2006 and September 2007 Environmental Statements, it is almost impossible to say what alterations have made, given that the Environmental Statement is in 14 volumes. This unreasonable and obstructive behaviour cannot be justified in an era of more open and answerable government, and Transport Scotland should provide a summary of all the main areas of change in the new Environmental Statement. I therefore reserve the right to comment further on the Environmental Assessment once such information is provided, even if such an objection falls out with the current time limits.

26. The grand plan is commuter driven, but the AWPR is not a commuter solution

It is acknowledged that Aberdeen’s traffic is generated mainly because of the radial routes bringing traffic into Aberdeen. Traffic flows may not have modelled the “Edinburgh Bypass effect” whereby the original estimates for traffic using the bypass severely underestimated the amount of vehicles coming from within the Bypass, travelling out on the radial routes and then round the Bypass to come into the city on a different radial route. If this is the case, then the flows round the bypass may have been underestimated, leading to an optimistic view of time savings in journeys and lack of congestion at the junctions.

27. Lack of inclusion of the Fastlink in the Structure Plan or Local Plan

No indication of the Fastlink is shown either in NEST, the Structure plan for the area, or the Aberdeenshire Local Plan. As a result, the proposed road is not in accordance with the development plan.

28. Noise impacts

The re-issued Environmental Assessment indicates that a large number of properties will suffer a substantial impact through increased noise levels. No indication of any mitigation is given to ameliorate this problem; indeed the non-technical summary indicates that it has not been feasible to reduce noise impacts to within threshold levels at some properties. Minimal properties may qualify for noise insulation, which is not acceptable.

29. Lack of proper explanation as to why alternative routes have been abandoned.

Although the Consolidation Assessment Report gives a brief history of the development of the AWPR, this is in far too scant detail to justify abandoning the previous Murtle route in favour of the current route.

30. The road design now has been amended to exclude various elements originally included

1. Refinement A96 Junction – no longer a Grade Separated Junction, which will lead to traffic jams towards the airport.
2. South Kirkhill industrial estate junction removed, which will lead to increased traffic on other local roads.
3. A90 Blackdog junction changed.
4. River Dee bridge crossing – viaduct, not bow arch which has design and landscape implications.

It would appear that these are driven by cost-cutting concerns, rather than building the road to the correct specification required.