

Consultation on the Aberdeen Western Peripheral Route: Road Orders Ref RYG/109/13/01



**Friends of
the Earth
Scotland**

A response from Friends of the Earth Scotland 8 February 2007

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1. Introduction

This response represents the views of Friends of the Earth Scotland, an environmental charity established in 1978 and an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability. This response covers each of the road orders that collectively form the Aberdeen Western Peripheral Route proposal and should be recorded as an objection to the scheme.

2. Reasons for objection

- 2.1 The project will facilitate **increased traffic growth** contrary to current government policy.
- 2.2 The project will result in **increased green house gas emissions** contrary to current government policy and sets a dangerous precedent in its assumption that individual projects at a local or regional level need not consider wider targets.
- 2.3 The project will have **negative local environmental impacts affecting communities, landscapes and biodiversity** and is contrary to government policy.
- 2.4 The project will **reduce the air quality** of certain areas and there needs to be more consideration of how this might affect vulnerable sections of the population. The cost effectiveness and appropriateness of the project as a solution to urban air quality requires reconsideration.
- 2.5 There is a high probability that any **positive economic impacts are exaggerated** and predicated on both high traffic growth and new development within the Aberdeen green belt
- 2.6 There has been **insufficient consideration of alternative and more environmentally benign solutions** to Aberdeen's transport problems, despite evidence showing the advantages of other options.

3. Specific comments

3.1. Traffic growth

Excess and growing levels of traffic will reduce local environmental quality for any exposed communities whilst also increasing global pollutants, most critically CO₂. Noise, community severance, loss of visual amenity and air pollution from traffic clearly diminishes quality of life and wellbeing for affected communities. The AWPR will result in overall net increase journeys and also in trip length, yet will only provide short term respite for certain parts of the network from growing traffic levels. This is contrary to government policy, of stabilising traffic levels at 2001 levels by

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2021. This contradiction is mirrored at a local level within the Aberdeen area where AWPR conflicts with the aims that:

- By 2011, to reduce the total number of vehicle trips within the Aberdeen area, consisting of the City and its main catchment area of 20 miles around, by 20% of 1997 levels (a reduction of 29% on projected “do nothing” figures).”
- By 2011, to reduce the total vehicle mileage traveled within the built-up area of Aberdeen by 20% of 1997 levels (a reduction of 30% on projected “do nothing” figures).”

The Standing Advisory Committee on Trunk Road Assessment (SACTRA) concluded in its seminal 1994 report that provision of new road capacity will tend to generate new traffic. This is supported by recent research into the impacts of the Newbury Bypass which showed that within a few years of opening it created high levels of additional traffic, with levels exceeding those before the road was built - reaching the level forecast for 2010 by 2003. This must be taken into account when considering the Aberdeen proposal - as any increased traffic growth will diminish the scheme’s predicted economic benefits and accentuate its negative environmental impacts.

3.2 Green house gases

Climate change is the greatest environmental threat facing society, and to avoid catastrophic impacts it is vital that developed nations, such as Scotland, cut their CO₂ emissions by at least 60% by 2050. There is strong scientific evidence that much earlier and greater reductions are necessary to keep atmospheric carbon dioxide levels within safe limits. A critical and growing source of emissions is transport, which is cancelling out progress in other areas. Compared with a ‘do nothing’ approach, the AWPR will result in a 7% increase in emissions of some 24 Kilo tonnes by 2025, which will have to be compensated via other policy mechanisms. FoES argues that other solutions of the scale and cost of AWPR may either reduce the increase in emissions or deliver a net reduction

We note that a key strategic outcome of the National Transport Strategy (P.13 para.10) is to *“Reduce emissions, to tackle the issues of climate change, air quality and health improvement.”* The NTS (p41 para.127) states, *“the key challenge for transport is to break the link between economic growth, increased traffic and increased emissions”*. Clearly, the AWPR is a scheme designed in pursuit of the former which will deliver the latter. Para 128 of the document also states that, *“delivering carbon savings is a central feature of Scotland’s National Transport Strategy.”* In this respect the following should be noted:

- It is extremely misguided to state that because the AWPR is a relatively small part of the problem of rising emissions across Scotland/UK that it should be ignored in the context of meeting our climate change goals. If built, the AWPR would generate significant additional carbon emissions. Ignoring new sources of emissions of this scale could cripple the Scottish Climate Change Strategy, by sending a message to other groups and areas of the country that national targets on CO₂ need not apply to them, where this is inconvenient.
- In the case of the AWPR no meaningful arguments are presented stating why the overarching goal of reducing emissions should be waved, despite the fact that the NTS measures progress on both the level of carbon emissions and the amount saved.
- The road’s promoters make no effort to consider the costs of offsetting the resultant increase in emissions, yet they expect or assume that compensation will be found in other geographical areas or sectors of the economy.
- It is assumed that the equivalent carbon savings can be easily delivered elsewhere in the economy. This is simply not the case based on current levels of progress towards national and international climate change goals. Clearly it will be extremely challenging to meet the necessary targets in other sectors. We therefore question the promoters’ mandate to unilaterally pass the buck on emissions reductions to other unspecified areas of government.
- If the scheme is built and in operation by 2011 it will reverse 1.3% of the total national savings from the transport sector, achieved during the period 2004 – 2010. Whilst this is small, it should be remembered that any savings at a national level are not net and simply offset the

transport sectors growing emissions – therefore the AWPR makes an increasingly bad situation worse.

- The principle of “using sound science responsibly” as set out in the Scottish Executive’s Climate Change and Sustainable Development strategies, is being ignored, because high level scientific data now conclusively indicates that it is dangerous to knowingly increase emissions of CO₂ in terms of impacts on the global climate.

Friends of the Earth Scotland, believes that the AWPR presents a dangerous precedent in relation to the promotion of projects that contradict government policies on climate change.

3.3 Local environmental impacts

The project will have serious environmental impacts on the water environment at twelve sites and at least 19 sites of ecological and nature conservation interest. Several priority and protected species, including badgers, red squirrels, freshwater pearl mussels and otters will be affected. Areas of landscape significance including the Don and Dee valleys will be affected and negative visual impacts will be felt at 45 locations. Areas affected will be mature woodlands, open undulating farmland and hillsides. At a strategic level the scheme will result in the creation of an ecological barrier around Aberdeen. The cumulative impacts of the inevitable developments around the AWPR will exacerbate issues of habitat loss and fragmentation.

The proposal is therefore incompatible with the provisions of the Nature Conservation (Scotland) Act 2005 and the Scottish Biodiversity Strategy. The project also contradicts the Local Biodiversity Action Plan and the nature conservation policies in the local and structure plans and those set out in National Planning Guidance

We note direct and severe human impacts stemming from the demolition of sixteen dwellings. On a wider scale over 1300 properties will suffer increased noise because of the scheme.

There will be adverse impacts on pedestrians, cyclists and communities due to increased journey length, loss of visual quality, and mitigation will not be possible on some locations.

500 hectares of agricultural land will be lost and this will have a negative impact on farming interests.

Friends of the Earth Scotland believes that these local impacts on communities, landscape, ecology and biodiversity are unacceptable and incompatible with local and national planning policies.

3.4 Air quality

It is clear that a project of this scale with its impact on traffic flows will have negative and positive impacts across the city and its hinterland. Whilst we accept that there may be some benefits in the urban area, Friends of the Earth believes the modest nature of these benefits and the high cost of securing them through construction of AWPR indicate that there are much better and less expensive alternatives to addressing local air quality issues. For this reason, we feel that investing public money in a project that actually reduces the air quality for 25,000 homes is both a perverse and unacceptable policy.

We have serious concerns that the project does not take account of recent evidence on the impact of traffic-generated air pollution on public health, especially vulnerable groups such as children and teenagers. We note impacts have been modelled up to 200m from the road, whilst a recent study has shown effects within 500m of major roads. In this respect we note the proximity of several schools and other educational establishments within 500m of the road. Despite improvements in the urban area it must be noted that AWPR, according to the projects own Environmental Statement will result in a net increase in emissions at a time when policy is focused on reducing emissions.

The AWPR is a highly inappropriate mechanism for addressing urban air quality issues because has a net detrimental impact in terms of overall levels of pollutants and the fact that it actually lowers air quality in specific locations. More robust research is needed into its potential health impacts on communities and vulnerable groups living next to the proposed route.

3.5 Exaggerated economic impacts

The Inquiry into the M74 Northern Extension demonstrated that the Scottish Executive, Development Agencies and Local Council exaggerated the benefit of major road schemes in terms of economic multipliers and jobs. The evidence presented with the AWPR indicates that history is repeating itself. A review of recent studies into the interaction of transport and local economies clearly shows that improved accessibility is only one, and possibly not the critical factor in enhanced rates of economic development. Due to the fact that traffic levels are continuing to rise, and the lack of restraining measures within the strategy, it seems highly probable that any economic benefits of the scheme will be impermanent and eroded over time. We also argue the benefits of the scheme will predominantly be local rather than national and marginal in terms of savings in relation to the overall costs borne by business in the area. In terms of job creation we argue that the AWPR does not represent value for money, compared with alternative forms of public investment focused directly on job creation. Nor are the costs to the public of mitigating the effects of increased emissions built into the project, a factor that further diminishes its net economic value.

Friends of the Earth Scotland therefore argue that the claimed economic benefits are both questionable and insufficient to justify the serious and irreversible environmental and social impacts associated with the AWPR.

3.6 Failure to consider alternatives

Effective environmental policymaking must be undertaken at a strategic level, not just mitigation at an individual project level, a fact reflected in recent European legislation. A key part of the Strategic Environmental Assessment process (SEA) is a consideration of alternatives so the most optimum solution can be determined. We note with alarm that the AWPR has not benefited from the type of scrutiny offered by an SEA of the Local Development Plans and Regional Transport Plans. It may therefore be quite possible that all the claimed benefits of the AWPR could be delivered via alternative means without the environmentally negative consequences of the proposed scheme and at less cost.

In terms of alternatives it should be noted that the 1998 Scottish Office "Sustainable Transport Survey for Aberdeen" found that traffic levels in the city could be reduced by 29% through low cost measures, including parking controls, extended bus priority and better facilities for pedestrians and cyclists. It also concluded that the overall impact of the AWPR would be minimal and far less cost effective than a combination of demand management and improved public transport. Growing evidence about the environmental and social costs of transport has in the intervening time reinforced and not diminished these conclusions.

Belatedly tagging on public transport elements to a largely roads based strategy, fails to appreciate the thrust of current transport policy. We find it perverse that public transport infrastructure improvements are now being used as part of the justification for the project, when in fact proper and sustained investment in public transport could well make the need for new and increased road capacity redundant.

As previously stated, we have seen no evidence that there has been consideration of whether the resources ploughed into the scheme could be invested in other measures to deliver comparable economic benefits.

We also wish to highlight research by Dr David Gray, of Robert Gordon University in Aberdeen, Dr Iain Docherty, of Glasgow University, and Dr Jon Shaw, of Aberdeen University, which argues that it is not clear whether the AWPR represents good value for money, because it has not been properly appraised at a national level.

Friend's of the Earth Scotland argues that by failing to evaluate/consider alternatives in a systematic or robust way, the promoters have failed to establish the overriding need for the road.

3.6 Other grounds for objection

The proposal is:

- Contrary to the approved local plan covering the southern leg of the route
- Based on a flawed public consultation into the choice of final route
- Contrary to Scottish Planning Policy on Transport
- Contrary to the Scottish Sustainable Development Strategy
- Does not represent "Best Value" in terms of public investment

4. Conclusion

A roads scheme of this scale will inevitably have serious, irreversible and unavoidable environmental and social impacts both locally and on a wider scale. Environmental issues now have heightened importance due to growing evidence concerning the causes and impacts of climate change, with public policy being increasingly directed towards reducing emissions of carbon dioxide emissions - with transport being a critical sector. Given this context, it is clear that there would need to be an overwhelming issue of national importance for such a destructive project to be deemed acceptable – no such need has been established especially as lower cost alternatives exist. The scheme and the precedent it sets must be seen as a direct threat to the delivery of Scotland's Climate Change Strategy as its approval would imply that individual projects need not show any sense of collective responsibility in terms of addressing the overriding need to reduce CO2 emissions. Friends of the Earth Scotland therefore argues that the scheme must be rejected on its negative impacts, which outweigh any perceived benefits and therefore the Road Orders should not be confirmed.

For further information please contact:

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