

# TRANSform Scotland

*the campaign for sustainable transport*

## Aberdeen Western Peripheral Route

Objection to Road Orders – your ref. RYC/G109/13/01

Friday 9th February 2007

### 1. Introduction

- 1.1 TRANSform Scotland is the national sustainable transport alliance. We campaign for a more sensible transport system, one less dependent on unsustainable modes such as the car, the plane and road freight, and more reliant on sustainable modes like walking, cycling, public transport, and freight by rail or sea. We are a membership organisation bringing together rail, bus and shipping operators; local authorities; national environment and conservation organisations; and local environment and transport campaign groups. TRANSform Scotland also has individual supporters.
- 1.2 This paper represents our formal **objection** to the Road Orders for the Aberdeen Western Peripheral Route:
  - A90 (Aberdeen Western Peripheral Route) Special Road Scheme 200[]
  - A956 (Aberdeen Western Peripheral route) Special Road Scheme 200[]
  - A90 Trunk Road (Charleston to Blackdog) Detrunking Order 200[]
  - A96 Trunk Road (Dyce Drive to Haudagain Roundabout) Detrunking Order 200[]
- 1.3 We consider the Scottish Executive's decision to progress with the Aberdeen Western Peripheral Route proposal as being in complete contradiction with its new National Transport Strategy and Climate Change Programme.
- 1.4 In particular, we consider that the Scottish Executive Ministerial commitments to the funding of this project is untenable within the context of the road traffic stabilisation target and climate change strategy that the Executive has committed itself to. It also stands in stark contrast to the objective-led principles that underlie the Scottish Transport Appraisal Guidance.
- 1.5 Finally, we are concerned that this consultation process is no more than a window-dressing exercise. The decision by the Scottish Ministers to proceed with the M74 Northern Extension - despite the specific recommendations of the Reporters of the Public Local Inquiry not to proceed with the project - has entirely undermined confidence of the Scottish Executive to fairly conduct planning processes into transport schemes.

### 2. Background to proposal

- 2.1 There have been proposals for an orbital road for Aberdeen for many decades, and perhaps since as far back as the 1930s. The current proposal was developed in the 1980s by Grampian Regional Council in a form near to current proposal. This proposal, whilst remaining in local transport strategies of local councils, was largely in abeyance until a business campaign forced the First Minister, in January 2003, to give Scottish Executive support to the proposal. Business groups (especially developers and road freight lobby) have also been instrumental in pushing the proposal.

### 3. Proponents' claimed benefits of proposal

- 3.1 The proponents of the road claim it will provide transport benefits, amongst other things alleviation of congestion on the existing road network, increased road access to the north and west of the city, improved access to Park+Ride sites, and reduced pressure on bus priority lanes.

- 3.2 We consider that the project would have many negative impacts on transport, the environment and social inclusion, and we will address these impacts below. We would however accept that there would be some initial transport benefits provided by the project, albeit that most of these would be short-lived due to the road traffic generation that would occur.
- 3.3 What is seldom articulated, but should be manifestly clear, is that the AWPR is also – and perhaps *mainly* – about opening up sites in the city’s western Green Belt for development. We consider it *fundamentally dishonest* for the proponents of the road not to make this clear in their promotional materials.

#### **4. Failure to conduct multi-modal appraisal**

- 4.1 There has been a complete failure to conduct a multi-modal appraisal of sustainable transport alternatives to road-building. This is plainly incompetent given that this is existing Scottish Executive policy, and runs contrary to the Scottish Executive’s own guidance to local authorities, and its own Scottish Transport Appraisal Guidance.
- 4.2 The failure to conduct a full multi-modal study is especially grave given the findings of the *Sustainable Transport Study for Aberdeen* (Scottish Office: 1998) that low-cost combinations of measures, including parking controls, extended bus priority and improvement to walking and cycling priorities, could reduce traffic levels in the city by 29% by 2011; whilst a road-building led strategy would produce limited benefits.
- 4.3 The current policy direction, by focussing on road-building *before* investigating more sustainable options, is entirely unbalanced and environmentally irresponsible in the extreme.
- 4.4 Government guidance, has for many years, been very clear on this issue:

*"We want to see new roads built only where it makes sense to do so: that is, after a thorough appraisal of the costs and benefits associated with any proposed scheme and any possible alternative modes which might serve the same route."*  
(Transport White Paper 'Travel Choices for Scotland', Scottish Office: 1998)

*"Before including major new [road] schemes in their strategy, local authorities should be able to demonstrate that they have looked at alternative or complementary solutions such as public transport improvements and traffic management measures, and that the road scheme is consistent with an integrated transport strategy."*  
(‘Guidance on Local Transport Strategies and Road Traffic Reduction Reports’, Scottish Executive: 2000)

- 4.5 More recently, the Central Scotland Transport Corridor Studies have taken forward the multi-modal appraisal approach in an attempt to investigate sustainable alternatives to road capacity increases. It is deeply unfortunate that the Scottish Executive has failed to assess the alternatives to road-building, and is instead following an outmoded “predict and provide” mentality to transport, when demand management measures should instead be being prioritised.

#### **5. Failure to present information on road traffic generation impacts**

- 5.1 The 2005 public consultation documents for the proposal failed to make clear what are the base years for the traffic level data presented, or to what years the projected changes in traffic levels represent. This is a serious omission.
- 5.2 We would expect this project to have major traffic-generating impact. The acknowledged authority in this field, the Standing Advisory Committee on Trunk Road Assessment (SACTRA), concluded in its 1994 report *Trunk Roads and the Generation of Traffic* that provision of new road capacity will tend to generate new traffic “where the network is operating or is expected to operate close to capacity” and in particular “in and around urban areas” (section 15.05). These conditions are exhibited in the case of the AWPR proposal.

5.3 Scottish government policy, has for the best part of a decade, acknowledged that road-building will tend to generate more traffic:

*"We acknowledge that the 'predict and provide' approach to road building is unaffordable, unsustainable and, ultimately, self-defeating. New road capacity can generate more usage and add to congestion."*

(Transport White Paper 'Travel Choices for Scotland', Scottish Office: 1998)

5.4 More locally, the *Sustainable Transport Study for Aberdeen* concluded that there would be only a minimal reduction in congestion in the city area from constructing a western bypass. Crucially, however, this report did not assess the traffic generation impacts of additional road capacity.

5.5 We would expect these impacts to be substantial - *yet the 2005 consultation failed to present any information on this topic.*

## **6. Failure to present information on the impact on road traffic reduction strategy**

6.1 The 2005 consultation presents no information on the impact of the expected traffic generation impacts on Aberdeen City Council's road traffic reduction strategy.

6.2 The City Council has set itself the challenging targets to:

- *"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 travelled within the built-up area of Aberdeen by 20% of 1997 levels (a reduction of 30% on projected "do nothing" figures)."*

6.3 These targets are now under threat by the road-building focus of the region's transport strategy. It is unfortunate that the Scottish Executive is not focussing its activities on measures that would assist local authorities in implementing its responsibilities under the Road Traffic Reduction Act 1997. Instead, it is engaging in the planning of road schemes that will generate more traffic.

6.4 In the absence of any demand management strategy, we would expect that this project would increase road traffic on the city road network and worsen environmental conditions in the city.

## **7. Failure to present information on impact on climate change strategy**

7.1 The 2005 consultation presented no information on the climate change implications of implementing this road project, and upon the integrity of Aberdeen City Council's Climate Change Action Plan (October 2002). Given the likely large traffic generating impact of this road project, we would conclude that this road project would have a major adverse impact on the City Council's performance on climate change.

7.2 The City Council suggests in its Climate Change Action Plan that it is imperative to *"look at how we can reduce the emissions from fossil fuels that are causing climate change"* (page 4). That the major plank of the transport strategy for the city is based on new road-building is clearly at odds with the Council's strategy on climate change.

## **8. Failure to present information on development control framework**

8.1 The 2005 consultation presented no information on how traffic-generating out-of-town developments would be prevented.

8.2 Aberdeen City Council's decision to give planning approval for Aberdeen Football Club plc to relocate its stadium from an accessible city centre location to an edge-of-town football location on a greenfield site undermined confidence in the competence of the development control functions at Aberdeen City Council.

8.3 On current form, we would expect that the impact of the construction of a western bypass would be to allow uncontrolled sprawl into the Green Belt.

## 9. Conclusions

9.1 The Scottish Executive has concluded that traffic will grow by 27% over the next 20 years unless action is taken to switch away from reliance on road traffic. Most of the growth in traffic is predicted to occur in and around the major cities. The Scottish Executive's target for stabilisation of road traffic levels, and the climate change strategy that underlies this, will certainly not be met if local authority transport aspirations focus, as they currently do in Aberdeen, on traffic-generating road-building projects.

9.2 The Scottish Executive, by taking on this massively destructive project as one of its own, has demonstrated its dereliction of duty on sustainable transport and the environment.

9.3 In summary:

- Scottish Office research concluded, as long ago as 1998, that a sustainable transport package could address the traffic problems that a western bypass couldn't.
- This report, the *Sustainable Transport Study for Aberdeen*, was then conveniently forgotten.
- An incompetent process has been followed, specifically ignoring Scottish Executive instructions to follow an appraisal process that is objective-led and multi-modal. Instead, a decision has been taken to proceed with a 'pet project' that is both highly expensive and in contradiction of key policy objectives.
- The AWPR won't tackle city traffic problems in anything but the very short-run, especially as the city's worst traffic congestion is on radial routes into the city.
- Alternative, sustainable, strategies may have more prospect of success – but have never been analysed. For example, reinstating rail routes on radial corridors into the city could work – but Aberdeen City Council is patently not interested in pursuing these, having, for example, made zero progress in procuring Aberdeen Crossrail commuter rail services (beyond commissioning an endless stream of consultants' reports).
- Construction of the AWPR would certainly have major negative adverse impacts on the city's Green Belt, landscape, wildlife and habitats, and access to green space.
- In the context of a declining city population, it is certainly counterproductive to be promoting development in peripheral (including Green Belt) locations.
- It is a misallocation of public funds to be providing for the expansion of road freight for a region where, because of its location (i.e. distance from markets), rail and sea freight should be competitive, and prioritised for funding.
- Past experience has been that such road projects would lead to the generation of more road traffic. This will generate more climate change emissions, increased car reliance, and undermine the viability of public transport services.
- The idea that NESTRANS is promoting a "Modern Transport System" is frankly preposterous. By pursuing a development strategy based upon subsidy for car use and road freight, the proponents of the project will further undermine the city's environment, quality of life and international standing.

## **TRANSform Scotland**

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