



**19 The Meadows
Milltimber
Aberdeen
AB13 0JT**

11 August 2008

**Mr Colin Bell
DPEA
4 The Courtyard
Callendar Business Park
Falkirk
FK1 1XR**

Dear Mr Bell,

CBMCC submission to Public Local Inquiry to hear objections to various schemes and orders relating to proposed Aberdeen Western Peripheral Route

I write on behalf of the Cults, Bielside and Milltimber Community Council (CBMCC). I refer to our previous letters of objection and responses received from Transport Scotland (re.

http://www.cbmcommunity.org.uk:80/index.php?/cc_plan_subgroup):

8 February 2007 - Letter of objection to the AWPR

10 September 2007 - Response from Transport Scotland

21 October 2007 - Letter of objection to the AWPR Side Road and Stop-Up Road Orders

21 October 2007 - Letter of Objection to the AWPR Road Orders

7 January 2008 - Response from Transport Scotland

We understand that the above-referenced objections continue to stand and that the Reporters will review these in conjunction with the responses received from Transport Scotland.

With respect to the above, we wish to state our continuing frustration that Transport Scotland has not answered many of questions that we have raised. Indeed we believe that their responses have at times been misleading and disingenuous. Furthermore, we envisaged that the public inquiry would ensure there was proper scrutiny of the facts surrounding the building of the Aberdeen Western Peripheral Route (AWPR). We are instead concerned that the decision to narrow the scope of the public inquiry is a deliberate attempt to avoid disclosure of the lack of objectivity regarding the choice of the proposed route and deny appropriate challenges about the competence of Transport Scotland in the way that the project has been managed. In particular we would like to highlight the following, which we believe should be considered within the restricted scope of the public inquiry:

1. Costs and Benefits

At the pre-inquiry meeting on 13 May 2008 we were informed that Transport Scotland would provide a cost update on the project, but that it would only focus on the escalation of road construction costs. On the contrary, we would expect the cost update to include:

- Costs related to amendments in the road design since 2005 (these have never been in the public domain);
- Total of other costs (compulsory purchases, relocation of the international school, consultancy fees, etc.);
- Escalation of road construction costs since 2005;
- Cost of public borrowing in whatever forms it takes.

In addition we were advised that revised traffic flow information would be updated to reflect some environmental changes. However, the traffic congestion improvements advised to the public in the last series of public exhibitions included the assumption that all the Modern Transport Strategy measures would be implemented. We now know that this will not be the case. The cross rail project in its previous form, for example, has been shelved. Thus the congestion improvement forecasts at the various 'pinch points' in Aberdeen are wholly inaccurate. These changes that reduce the overall cost/ benefit ratio for all the routes have a more significant impact on the Milltimber Brae/Netherley route because it is the longest, most expensive and furthest from the city centre.

We understand that Transport Scotland is anticipating spending 4-6 weeks to present their case at the public inquiry. However, the integrity of the process is put into question if the most critical information about the real cost of building the road and its benefits is not made available to the public. The majority of the Aberdeen and Aberdeenshire public, including our community, have been led to believe that the prime purpose of the road is to reduce congestion in and around Aberdeen. Even those who strongly believe that they will be beneficiaries of the new road expect that the public inquiry will give confidence that the preferred route is good value for money, through an up to date cost/ benefit analysis on the proposed route. It is therefore strange and suggests an ulterior motive for Transport Scotland to withhold essential data that would demonstrate that this is the case.

Transport Scotland therefore needs to explain the amended benefits of the AWPR in reducing congestion against a realistic forecast of the total costs.

2. Alternatives to Proposed Route

We are unconvinced that the alternatives to the proposed route have been properly assessed. In particular we believe that the two tunnel options, the Eastern Peripheral Route via the Aberdeen Harbour and the Hazlehead route, only received cursory consideration. We reject the view that these were not consistent with other objectives as stated by Transport Scotland in their response of 10 September 2007. Extensions to park and rides will only have a peripheral impact on reducing congestion in Aberdeen. The Eastern Peripheral Route provides good access to the commercial centres planned for the north of the city along the Peterhead corridor and better access to those in the south east and the harbour. The Hazlehead route connects the commercial centres in the northern, western and southern parts of the city. Both the tunnel options have a much more significant impact in reducing congestion in Aberdeen than the proposed route. The principle issue is the cost of tunnelling which we believe has been overstated relative to the costs of the preferred route. We believe that one of the main reasons why these options were not properly considered was the lobbying of a number of influential parties, some of whom stood to gain by using the AWPR as a means of gaining access to significant areas of Green Belt for industrial and housing development.

We understand that the Aberdeen Green Belt Alliance will present specific proposals at the public inquiry on the tunnel options. We believe they are better placed than the CBMCC to provide detailed evidence to the inquiry and together with others challenge the thoroughness of Transport Scotland's assessment of these options.

The Green Belt designation is aimed at safeguarding the countryside and preserving the setting of Aberdeen and in particular the special character of the Dee Valley. Constructing the AWPR as planned will inflict significant adverse effects on wildlife and the environment, destroying the unique character and quality of the countryside around the west of Aberdeen. Milltimber will be particularly adversely affected. The preferred route of the AWPR is not in accord with key policies, as admitted in the Environmental Statement itself: *"The identified Substantial impact, therefore, represents a conflict with planning policy"*.

3. Changes between Environmental Statements

There appears to have been a subtle lessening of emphasis and change in language between the first Environmental Statement issued in January 2007 and the second Environmental Statement issued in August 2007 following Transport Scotland's receipt of numerous letters of objection in early 2007, e.g. when describing the cumulative impact of the AWPR on geomorphology, ecology, landscape and pedestrians along the southern leg. By way of example, whereas in the first Environmental Statement the impact was described in the following terms:

"Overall the AWPR, together with other major proposals would serve to open up the Aberdeen hinterland to further development, significantly changing the rural land use context of the region"

"Land remaining inside the AWPR boundary would be more likely to be developed, due to improved access via the road thus further reducing its overall value for nature conservation"

"At Milltimber, the introduction of the proposed scheme in cutting, demolition of buildings and the loss of mature woodland and amenity planting will permanently alter the landform, suburban landscape and enclosed visual character of the area. The overall cumulative impact on urban areas however will not be significant"

In the second Environmental Statement, this had been reduced and diluted to:

"Together with the AWPR, other major proposals could in future significantly change the rural land use context of the region"

"At Milltimber, the introduction of the proposed scheme in cutting, demolition of buildings and the loss of mature woodland and amenity planting will permanently alter the landform, suburban landscape and enclosed visual character of the area, which is a localised significant impact on this area. The overall cumulative impact on urban areas however will not be significant"

This begs the question as to what had changed in the period between the issuing of the two Environmental Statements to cause such subtle changes. We believe that it is important that the Reporter examines the reasons for Transport Scotland having caused these and other subtle changes in emphasis and language to be made. The Environmental Statement should be a purely objective analysis and there needs to be clarity on whether any political bias has been introduced.

Issues Specific to the CBMCC Area

Individual residents directly affected by the line of the route will be making their own representations to the inquiry. The following highlight particular issues within the CBMCC area, which will have a profound impact on a wide range of members of the local community.

4. Traffic on North Deeside Road if AWPR is built

We have received very confusing information from Transport Scotland about the traffic flows along the North Deeside Road (A93). Forecasts have been constantly changed, errors have been made and some projections have been withdrawn without replacement. The concern is that the AWPR will lead to increased traffic volumes and more congestion along the North Deeside Road.

More drivers will use the AWPR to join the A93 at peak times, making use of the North Deeside Road as their main commuting route into the centre of Aberdeen. This will be exacerbated by the traffic light junction connecting traffic from the AWPR with the North Deeside Road. It is acknowledged that the impact of the AWPR will reduce traffic using Malcolm Road in Peterculter. However, more traffic will transfer from the South Deeside Road west of Peterculter to access the AWPR and travel into the centre of Aberdeen. The traffic light junction will create tailbacks into Peterculter at peak times. This is supported by current evidence of significant queuing at traffic light junctions along the North Deeside Road.

The letters of 10 September 2007 and 7 January 2008 from Transport Scotland refer to predictions from the Aberdeen sub area traffic forecast model (ASAM) of traffic reductions on Malcolm Road, the Milltimber Brae Road and the Netherley Road. It is stated that the model predicts an overall 27% reduction in traffic volumes in the west of Peterculter and an increase of 8% to the east of Peterculter mainly due to traffic travelling within the village. In addition, a forecast 25% reduction in 2012 on the North Deeside Road just to the east of the new AWPR traffic light junction is indicated in Figure 4.7, Sheet b in the second Environmental Statement issued in August 2007. However, these figures differ from and are contradicted by figures presented to the public during public exhibitions, figures presented in the first Environmental Statement and figures stated in a letter from the Minister of Transport of 21 July 2006.

The fact that this information has been omitted and changed at various times has led to increased scepticism that there has been very selective use of the traffic model by Transport Scotland to present a positive picture of congestion improvement as a result of the AWPR/Milltimber Brae junction. Common sense and experience of using the North Deeside Road suggest that traffic volumes on the North Deeside Road will increase as a result of commuters from the south avoiding the Bridge of Dee and commuters from Westhill and Kingswell avoiding the Lang Stracht. The traffic model does not seek to present a balanced picture. We can only envisage further congestion on the North Deeside Road, which is already exceptionally busy during peak periods.

Transport Scotland claim that they have examined the issues of 'rat running' on Contlaw Road and the use of roads through the Milltimber estate to access the North Deeside Road to avoid the new AWPR traffic light controlled junction. They argue that it will not be significant and will not lead to increased safety risks. However, the ASAM does not examine *traffic flows to this level of detail* and we are far from convinced. It is our belief that the volume of traffic that will use the North Deeside Road into Aberdeen as a commuting route has been underestimated, which will lead to commuters finding new 'rat runs' to reduce their journey times.

We understand that the Colin Buchanan organisation will present evidence on behalf of Road Sense at the public inquiry on the ASAM traffic model. Unlike the CBMCC, they have the professional expertise to challenge the robustness of the traffic modelling on the preferred route. 10,000 people objected to the proposed route of the AWPR, believing that it is being built too far out to make a significant difference in reducing congestion in Aberdeen. Although we do not propose to give evidence we see this as a critical issue for the inquiry in the comparative assessment of different routes.

5. Paucity of Junctions

In terms of access to Aberdeen city from the south and south west, then going west there is only one junction onto the Fastlink at Stonehaven and two other junctions onto the southern leg at Milltimber and South Kingswells. This low frequency of junctions will tend to funnel traffic travelling into and out of Aberdeen city from the south and south west onto the North Deeside Road. The AWPR is also likely to be a contributory factor resulting in increased housing and industrial development on areas of Green Belt, particularly Lower Deeside, as clearly stated in the Environmental Assessment. There will be inevitable pressure from property developers to maximise the benefits of the few existing junctions on the AWPR, particularly the Milltimber junction. The existence of the AWPR will also be used as a justification for allowing increased housing development along the line of the North Deeside Road.

The increased housing demand will place severe pressures on the local Milltimber community, which it will be difficult to resist. The unique, traditional character of the Milltimber and wider Lower Deeside area will be gradually degraded and eventually lost.

The lack of junctions is a way of minimising cost but will adversely impact Milltimber residents in particular. Additional junctions should be considered to reduce the long-term, disproportionately adverse impact at Milltimber in particular and at Lower Deeside in general.

6. Health Risks

We believe that insufficient account has been taken of the risks to human health, particularly in the Milltimber area. There is the potential for people living within 500m of the proposed road to suffer ill-health as a direct result of the AWPR. It has been demonstrated that exposure to traffic pollution has adverse effects on children's lung development, which are independent of regional air quality, and which could result in important deficits in attained lung function in later life (*Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study, Dr W James Gauderman et al, The Lancet, January 2007*). This study also showed that good background air quality does not reduce the risks; countryside children living close to a main road remain vulnerable.

There is a body of evidence that respiratory health is adversely affected by pollutants from major roads, e.g. respiratory health in children is adversely affected by local exposures to outdoor nitrogen dioxide or other freeway-related pollutants (*Gaudermann et al, Epidemiology, 2005*), traffic-related pollution is associated with respiratory symptoms in children (*Kim et al, American Journal of Respiratory Critical Care Medicine, 2004*).

CBMCC contends there will be significant adverse impacts on human health, with the most vulnerable members of the Milltimber community being most at risk, including the elderly, children, those suffering from ill-health and people with special needs. The stress-related health risks to these groups during a lengthy and disruptive construction period should also not be underestimated. These significant health risks associated with locating a major road immediately adjacent to Milltimber properties, including the Camphill site and a home for the elderly, need to be fully examined and considered.

7. Noise, Light and Visual Impact

We remain concerned about the impact of noise and light and the visual impact should the AWPR be built through Milltimber Brae.

Regarding noise in particular, the response from Transport Scotland on 10 September 2007 indicated that “with the scheme in place the net results over the wider study area (outwith the core study area 500m either side of the proposed route) in the 15th year after opening would be that 1,865 fewer people would be annoyed by noise than would be annoyed by noise without the scheme

in place. This is considered to be a significant beneficial impact". We assume the 1,865 refer to households and not people.

We understand that decibel changes of 3 or less are not discernable to the human ear. Thus the real issue is how many households will experience a significant increase in decibel levels of 5 or more and how many will hear a significant decrease in decibel levels of 5 or more. We also want to know how many households will experience an increase in decibel levels of 9 or more where a significant adverse impact on their health is more likely.

Specific to the CBMCC area is how many residents in Milltimber will experience an increase of 5 or more decibels based on the World Health Organisation guidelines of using a quiet bedroom with an open window? In addition, when walking along the Old Deeside Railway Line from Aberdeen at what distance from the AWPR will walkers and cyclist hear a 5-decibel increase in noise?

Notwithstanding our objection to the route of the AWPR through Milltimber Brae, in the event that a decision is made to construct the road along this line then:

We understand that some mitigation measures will be implemented along the line of the route. This may include the laying of a road surface at specific locations that has a cushioning effect to reduce road noise. We have been advised that these surfaces are expensive to lay and costly to maintain. We would therefore appreciate confirmation that these surfaces would be laid along the whole route and that appropriate programmes would be put in place to ensure that the surfaces are properly maintained.

We firmly believe that the level of mitigation to prevent a significantly adverse impact on an unacceptably large number of Milltimber residents is insufficient. If the AWPR were built along the proposed route then additional measures at Milltimber, such as tunnelling, a deeper cutting, greater screening along the sides of the road, additional crossing-points for pedestrians, cyclists and equestrians etc. should be included in the design in order to reduce the particularly adverse impact at Milltimber. Such measures would be more costly but would be justified in terms of environmental proportionality.

8. Safety Issues and Impact on Old Deeside Railway Line

Notwithstanding our objection to the route of the AWPR through Milltimber Brae:

The construction of an over-bridge 100m to the north of the Old Deeside Railway Line at Milltimber Brae would require pedestrians, physically handicapped people in wheel-chairs, cyclists and horse-riders to mix with motorised transport. The resulting admixture has significant public safety implications. Most of Station Road is privately owned, has no pavements and is not maintained by Aberdeen City Council.

Furthermore, without the construction of a proper bridge that could contain a railway there is no realistic prospect that a railway line could ever be restored. The cost would be prohibitive if the AWPR were already in place. In essence the creation of the AWPR would prevent the development of such an alternative form of sustainable transport. Both the Deeside Railway Company and Aberdeen Outdoor Access Forum (Aboaf) have expressed opposition to the severing of the Old Deeside Railway Line for the purpose of constructing the AWPR at minimal cost.

The Aberdeen City Council gave a commitment in March 2006 to the Deeside Railway Company that the option would be retained to potentially use the Old Deeside Railway Line as a railway line in the future. Indeed in the evaluation of the other alternative AWPR routes, notably at Pitfodels, this principle was held to be sacrosanct. It appears that the criteria for the evaluation of alternative routes constantly change. The Old Deeside Railway Line has a high usage for pedestrians, physically handicapped people in wheel-chairs, cyclists and horse-riders. It is being upgraded to

facilitate disabled access. The popular route links Aberdeen City with the rural area to the west and promotes social inclusion, healthy pursuits and an appreciation of the countryside.

Given the need to maintain the Old Deeside Railway Line as an option for an alternative form of sustainable transport and that a new over-bridge via Station Road does have an adverse impact on pedestrians, disabled people in wheel-chairs, cyclists and horse-riders as indicated in the Environmental Statement, we believe that it is necessary for any AWPR scheme to include provision for a proper bridge capable of supporting a railway with no motorised access spanning the AWPR and the Milltimber Brae Road (B979). The gradients should be suitable for disabled people in wheel-chairs as well as for pedestrians and other users.

9. Culter House Road and Severance of NMU routes

The proposed design of the AWPR through Milltimber results in many rights of way and other pedestrian, cycling and equestrian (and some motorised) routes being dissected and stopped-up. To the south of the North Deeside Road, two pedestrian routes (R17 and R18) would be dissected and diverted in an unsatisfactory manner. To the north, with Culter House Road dissected, pedestrians (including families with young children and infants in push-chairs and those walking dogs), cyclists and equestrians would be forced to navigate up a new track linking Culter House Road with the Milltimber junction over-bridge and then along and across the link road. This would be a very hazardous operation. Indeed, the Environmental Statement includes the comment *“The diversion down the link road to the Milltimber junction will be significantly more unpleasant given the traffic prediction of 13,940 AADT”*.

We do not understand or agree with the logic for the assessment of the residual impact on journey time in the Environmental Statement as follows: *“The Culter House Road is identified as supporting recreation for pedestrians and equestrians. Whilst it is used by a small amount of traffic for access purposes, it is of predominantly recreational value, linking equestrian and pedestrian routes to the east and west. An increase in journey length will extend the linkage network between routes, which could be considered to be beneficial by users in some cases. The assessment of significance is therefore reduced to from Severe to Major for vulnerable pedestrians and from Moderate to Slight for equestrians”*.

The current road design would have the AWPR continuing in a cutting for a considerable distance north from the Milltimber junction. This would create a barrier and deny non-motorised users (NMU) the opportunity to travel through this stretch of countryside to the west of the Milltimber settlement. This would severely adversely impact the setting and character of Milltimber.

This would also severely limit the ability of residents either side of the road to appreciate and enjoy the local countryside. It would also severely limit options for creating and extending existing path networks and prevent any longer-term integration of recreational use with land management. For example, the Aberdeen Outdoor Access Forum has as an aspiration a cycling route through the countryside to the north of the North Deeside Road, linking schools in Peterculter, Milltimber and Culter. This could eventually form into a cycling commuting route between the schools and communities. This type of low cost scheme has the potential to encourage social cohesion and develop a healthier appreciation of the countryside, but such an option would be impossible under the current road design. Parents would not allow their children to cycle in similar fashion along the North Deeside Road, particularly with the new AWPR traffic light junction.

We are most disappointed with the way that such concerns as those above are dismissed in the Environmental Statement, e.g. *“Culter Academy: the AWPR Southern Leg will sever its catchment area in half. Given the size of this catchment, it is expected that most children would be driven to school or catching public transport. With all the minor roads in the catchment being maintained, there will be no impact”*.

Hence, notwithstanding our objection to the line of the AWPR through Milltimber Brae, we strongly believe that:

- The design of the Milltimber over-bridge as a route for non-motorised users needs to be completely rethought;
- An increased number of pedestrian crossing points need to be included in the road design, particularly north of the Milltimber junction where the road would cut through the countryside to the west of the Milltimber settlement.

In the Community Severance Assessment, the significance of the Milltimber junction over-bridge is assessed as “Severe” for both Peterculter and Milltimber community facilities. We strongly believe that a safer alternative is required, particularly for more vulnerable non-motorised users, if Culter House Road is stopped-up. The current proposal of traversing up and over the Milltimber junction and crossing the link road is simply unacceptable from a safety point of view.

Follow-Up

We assume that the Reporters will use this submission together with the previous objections and responses to prepare their own questions for the public inquiry. Thereafter, we assume that we will eventually be advised on the outcomes of the above either via the written findings of the Reporters or a written letter to our Community Council.

Yours faithfully,

Alistair Annand.

**Alistair Annand
Secretary**

On behalf of Cults, Bieldside and Milltimber Community