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Dear Sirs

Aberdeenshire Council's Response to Consultation on Initial Route Options for Dualling of the A96 – East of Huntly to Aberdeen

Following consideration of the above at the Council's Infrastructure Services Committee on 29 November 2019, I am pleased to submit the following comments on behalf of the Council. These build upon the views of the Council within their A96 Position Statement, agreed in April 2018. During the ongoing appraisal and assessment work, we anticipate that officers of the Council will be able to provide more specific information on the published route options, to assist your work.

Moreover, the Council's planning and environment services have highlighted key environmental considerations for each route and this is set out as an **Appendix** to this letter and should provide a starting point for further assessment of the options within these disciplines.

1. Introduction

- 1.1 Aberdeenshire Council are pleased to formally respond to the initial route options for the A96 Dualling project (East of Huntly to Aberdeen) presented by Transport Scotland and their consultant team AmeyArup in October 2018.
- 1.2 The Council recognises its role as a statutory body and significant stakeholder. Following consideration of the information made available at public exhibitions and online, discussions and debate at Committee level, this response sets out its views to Transport Scotland, in order to help shape both the ongoing appraisal of route options being

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undertaken by the project team, but also the manner in which this process is undertaken going forward.

- 1.3 The response below has been shaped by consideration of the issue at the Council's Infrastructure Services Committee at their meeting of 29 November 2018, which in turn was informed by consultation with relevant Area Committees of the Council affected by the proposals (Formartine 30/10/18, Marr 06/11/18, Garioch 13/11/18, and Banff & Buchan 27/11/18).
- 1.4 We thank you for agreeing to consider the Council's formal position beyond your requested cut-off date for responses of 22 November, which is a consequence of the Council's committee calendar.

2. Progress to Date

- 2.1 The Council has an established policy position that supports appropriate investment in the strategic transportation infrastructure of the area, and improvement of key external linkages. The proposed upgrade of the A96 supports this policy position, complementing recent investment in the Aberdeen Western Peripheral Route (AWPR), the Inverness to Aberdeen Railway, and investment in Kintore Railway Station. It also sits alongside the work on the previous Strategic Transport Projects Review (STPR) of 2008, the current review of the National Transport Strategy, the Strategic Transport Appraisal within the City Region Deal and the forthcoming STPR2. The proposed investment also aligns with the current and emerging policies of the Strategic Development Plan Authority, with the A96 recognised as a Strategic Growth Corridor.
- 2.2 Accordingly, the Council welcomes the progress that is being made within the DMRB Stage 2 process, noting that the establishment of initial route options is an important milestone to facilitate more detailed route appraisal work.
- 2.2 ***The Council recognises that it is only through objective and evidence led appraisal, which is presented in a transparent manner, engaging all stakeholders appropriately, that the optimum route choice can be determined.***

3. Requirement for Effective Ongoing Engagement with Affected Parties

- 3.1 The Council recognises that an immediate consequence of publishing more specific route options, is that individual property owners, landowners, and communities will for the first time become aware if they are either potentially directly or indirectly impacted by the alternative route options being considered. This is clearly a difficult period for those affected, due to the level of uncertainty of potential impacts, and in all probability their unfamiliarity with the route assessment and subsequent design and delivery processes.
- 3.2 It is noted that route options appear to have been selected which seek to minimise on a whole route level individual property impacts as far as possible at this stage.
- 3.3 ***The Council encourages the A96 Project Team to continue to effectively engage and clearly communicate with all affected parties, communities, and their Elected***

Representatives, to help ensure that there is clear information on the route option selection process, clear answers to queries, and an openness to understand the various concerns and issues raised.

4. Deselected Options

- 4.1 The publication of the Initial Route Options confirmed the de-selection of previously considered route improvement strategies.
- 4.2 The Council welcomes the de-selection of Route Improvement Strategy C, due to the adverse impacts on the protected landscape and setting of Bennachie, and wider cultural and environmental importance of this area.
- 4.3 The Council notes the de-selection of Route Improvement Strategy D, on-line variant, on the existing A96 alignment between Port Elphinstone and Blackhall roundabouts. It is appreciated that this is due to both physical constraints imposed by the available width of the current road corridor, the high environmental impacts that would be imposed on the residential properties directly adjacent to the upgraded route and the significant difficulty of delivering a grade separated junction at Blackhall roundabout. The Council wishes to see greater detail on the rationale for the de-selection of this option.
- 4.4 The Council is disappointed at the de-selection of Route Improvement Strategy Q (Oldmeldrum to Dyce sections) and while noting the rationale presented at the public exhibitions and within supplementary technical information provided to Council officers, wishes to see the detailed modelling that led to the de-selection of this route option. However, in terms of deliverability, we would wish to highlight that the costs and issues associated with crossing with River Don flood plain at Tavelty alongside the scale of the junction required to re-join the current dual Carriageway to the West of Kintore and the works required to the existing A96 between Kintore and the AWPR would be worthy of comparison to the costs and benefits associated with the full Route Improvement Strategy Q as it allows the railway and River Don to be crossed using the AWPR. In doing such work there would of course have to be consideration of the additional length of new dual carriageway and the requirements to re-engineer elements of the AWPR Goval Junction. We would recommend that if Transport Scotland has not yet undertaken this work then they should consider doing so before selecting a preferred option.

5. Routes to the North East or South West of Inverurie

- 5.1 The publication of initial route options by Transport Scotland pulls into sharp focus the requirement to reconcile local and individual impacts, whilst seeking opportunities to maximise wider strategic benefit for the wider area and region.
- 5.2 The Council considers that the greatest strategic benefits for the area can be achieved by pursuing a route option that is as close as possible to the existing line of the A96
- 5.3 Any route that is considered should deliver the following strategic benefits:

- a) Relief of traffic pressure in Inverurie by enabling businesses and households in the Oldmeldrum, Rothienorman and Uryside catchment areas to access the trunk road network without having to pass through the centre Inverurie.
- b) Consequential facilitation of the future development of Inverurie and its town centre;
- c) Opportunities to aid economic development associated with enhanced access to the strategic road network for communities and businesses to the north and north-east of the current A96 and A947 corridors; and
- d) Respond to development opportunities in the Oldmeldrum area, and further to the north such as Turriff.

5.4 It is noted that only initial traffic modelling information has been included in the information made available through the public exhibitions and website.

6. Deliverability of Options

6.1 The Council considers that all of the initial route options taken forward can be considered to be feasible.

6.2 At Tavelty, particular challenges are formed by the proximity of the soon to be constructed Railway Station, cemetery, existing grade separated junction and business park. Transport Scotland's project team will be required to meet SEPA and local authority requirements that any structure over the River Don at this location does not impact on the flood plain, and that there is no associated increase in flood risk within the river system and flood risk management area.

6.3 *The Council highlights the specific design requirement for any proposed crossing of the River Don, and at other locations, for there to be no adverse impact on the flood plain, and no associated increase in flood risk within the wider river system.*

7. Operational Resilience

7.1 The routes to the south and north of the A96 in the Glens of Foudland (R1, R2 and L1) will all require major earthworks whilst also significantly increasing the elevation of the route at that point. Both aspects will require careful design to build in the proper resilience, if these routes are taken forward.

8. Public Transport

8.1 *Whichever route option is taken forward, the potential impacts arising from changes to the provision of public transport services requires to be identified at an*

early stage, and this should be fully captured in the route selection appraisal process.

- 8.2 As the design work continues, experience from the AWPR project highlights the specific need to pay very close attention to the detail of where public transport stops are located, and how they are accessed, and how access for school transport and other non-conventional public transport services are provided.

9. Non-Motorised Users

- 9.1 The Council and its partners continue to invest in provision for Non-Motorised Users across its communities, and on key links between its communities, including those along the existing A96.

- 9.2 The Council urges Transport Scotland to fully consider the needs of Non-Motorised Users during the route assessment and route development work, fully mitigating against severance of any of these routes, but also realising opportunities to complete viable links and networks. As a minimum the overall Non-Motorised Users Strategy for the A96 Dualling should be fully implemented and the approach taken for the Nairn/Auldearn proposals replicated for this section of the route.***

10. Environmental Impacts and Opportunities

- 10.1 It is the expectation that the route option assessment work will continue to identify potential impacts on the natural and built environment, landscape and cultural heritage assets, and seek design solutions to minimise these impacts, and thereafter develop mitigation strategies as required, applying current best practice to realise opportunities for protection and enhancement.***

- 10.2 Notwithstanding the need for further assessment particular comment is made for the potential for landscape and visual impacts from all routes. In particular options R1, R2 and L1 in the Glens of Foudland would likely have a greater impact on the landscape than option C1. Built and cultural heritage assets are located close to all of the route options and siting of routes will need to consider the impact on these important assets. It should be noted that options V1/G1 and O1 would have a direct impact on Pitscurry Moss Local Nature Conservation Site (LNCS) whilst option B1 would impact directly on Wartle Moss LNCS and Transport Scotland will need to consider the impacts through the options assessment. The confluence of route options at Culsalmond and Colpy may give rise to specific impacts, and very detailed consideration of route options in this area will be required.

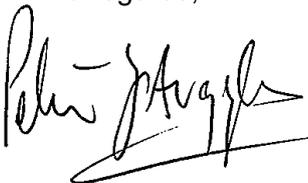
- 10.3 The Council is also concerned about the potential impacts on communities potentially split by the route options, and this include groups of settlements which share common facilities, such as Whiteford and Durno. Consultation with affected communities is essential in this regard to understand the nature of the connections.

11. Requirement for Further Interim Consultation

- 11.1 The Council recognises that it is necessary to present the initial route options at an early stage to facilitate further detailed assessment work, including “on the ground” survey work and consultations with affected property and landowners.
- 11.2 A consequence of this is that very limited factual information has been to be presented or provided alongside this route options to enable more objective assessment by stakeholders including the Council. This includes future projections of traffic flows associated with the route options as well as the background to the deselection of all of the initial routes.
- 11.3 *The Council requests that as in the example of work undertaken by the A96 Project at Elgin, further consultation on route options, supported by more detailed information, is made available during the course of the refinement of route options. This must be prior to the announcement of a preferred route option and be built into the process. The approach of coproduction of designs as used for the A9 at Birnam should also be considered at this next stage.***
- 11.4 *Furthermore it is requested that for future public exhibitions and briefings Transport Scotland and their Consultants engage early with the Council in order to make best use of the extensive existing opportunities for engagement with communities and elected members.***

Council officers anticipate further technical consultation on matters such as environmental impacts, development planning, transportation impact, and interface with the local roads network, and look forward to being able co-ordinate this work with you. We also commend close liaison with the offices of each Area Manager impacted by the proposals.

With kind regards,



Councillor Peter Argyle
Chair of Infrastructure Services Committee