

## **Bennachie Community Council**

### **Submission for A96 East of Huntly to Inverurie Consultation December 2020**

#### **1. Introduction**

All of the options for the proposed dual carriageway A96 run through the Bennachie Community Council (BCC) area. BCC represents more residents directly affected by the proposed options than any other community council. Whichever option is eventually built, many residents of the BCC area will be adversely affected. BCC has been active at each stage of the A96 dualling consultation, performing a detailed review of information provided and requested further clarification from Amey Arup on 01 February 2021 which was finally received on February 26<sup>th</sup> 2021.

Our submission is divided into two sections, the first of which is the BCC Detailed Response (Section 2). The second is a note of specific comments received from BCC area residents (Section 3). Section 4 concludes our submission.

#### **2. BCC Detailed Response**

It would not be representative for BCC to support one option over another, but we do have clear views on how the option finalisation and ongoing design should be considered.

##### **2.1 Projected Increase in Traffic Volumes Through Insch**

Feedback from the local community regularly identifies traffic and parking as a major concern in Insch. Although a residential community, the B roads which run through Insch, particularly the B992, form an essential part of the local traffic network so that as well as private vehicles, HGV and farm vehicle traffic routinely have to pass through the town. Traffic modeling data provided in the Stage 2 assessment suggests that the proposed configuration of the A96 dualling will result in an increase of 1300 vehicles per day through Insch. This is simply not realistic: the road configuration means that existing traffic levels already cause congestion in Insch. The level crossing on the B9002/B992 causes tailbacks on both routes. Aberdeenshire Council has also approved plans to reduce the width of part of the B992 from 7.4m to 5.5m. The recent Insch Flood Study revealed that the risk of fluvial flooding in several areas of the village is higher than previously thought, including parts of Commercial Road, Commerce Street and Drumrossie Street, all of which lie on the B992. Whatever final proposal for the A96 dualling is adopted, it is essential that it is accompanied by arrangements to alleviate traffic problems through Insch.

## **2.2. Traffic Volumes Through Other BCC Settlements**

Traffic data which is available in the Stage 2 assessment suggests that traffic volumes through some other settlements in the BCC area will be reduced (e.g. Oyne). However, information is not available in the Stage 2 assessment for all BCC settlements. Final proposals for A96 dualling and feeder traffic should not result in significant increases of traffic through any BCC settlement.

## **2.3 Junctions**

### **2.3.1 General**

Junctions on the proposed dual carriageway will be more widely spaced than current A96 access and egress. Design of the dual carriageway, slip roads and feeder roads must ensure that traffic to and from the new A96 does not increase traffic on unsuitable rural (C or unclassified) roads, particularly those roads where schoolchildren wait at unmarked stopping places for school transport. BCC is seriously concerned that many of these feeder roads are not suitable for increased traffic volume and fears that increased traffic volume may increase the likelihood of accidents. Furthermore, it is our understating that these roads remain the responsibility of Aberdeenshire Council and as such Transport Scotland/Amey Arup must take full account of Aberdeenshire Council's ability, financial or otherwise to maintain or improve all feeder roads to the standard that will be required.

### **2.3.2 Kellockbank Junction**

Specific concerns have been raised with respect to the Kellockbank junction. Eastbound traffic coming from Inch will have to use the existing A96, then cross the eastbound carriageway against oncoming traffic; the proposed junction location is adjacent to two properties, there appears to be minimal space to engineer safe access.

## **2.4 Non-Motorised User Provision**

Provision must be made along the entire route for Non-Motorised Users (NMU's). In addition to recreational walkers, runners, cyclists and horse riders, commercial stables depend on access to trails and cycle routes bring economic activity.

## **2.5 Economic Benefit to Local Businesses**

The dualling of the A96 is postulated to bring economic benefit to the A96 corridor. It is not apparent where benefit will accrue to the BCC area and some value will be destroyed (e.g. agricultural land). It is essential that the final design /construction of the new dual carriageway does not isolate local businesses and

retains good access from both directions to established local businesses such as Morgan McVeigh's, Kellockbank and Loch Inch fishery.

## **2.6 2021 Local Development Plan**

Design and traffic modeling for the new scheme must take account of potential developments in the 2021 Local Development Plan.

## **2.7 Economics**

Supporting information supplied indicates that for the preferred Cyan/Pink/Orange route the Present Value of costs exceeds the Present Value of benefits which accrue from the project by £151million. Indeed, in every end-to-end option costs exceed benefits. BCC queries the economic justification for this project.

## **2.8 Comments on the Orange Route Option**

### **2.8.1 Misleading Information Re. Preference of Aberdeenshire Council**

At the Virtual Community Council Forum held on 29 January 2021 Project Representatives advised those present that the Orange route option was preferred by Aberdeenshire Council. BCC subsequently contacted the Chair of the Aberdeenshire Council Infrastructure Services Committee on 31/1/21 to verify this statement which was found to be untrue as Aberdeenshire Council were yet to discuss or agree their position. This was misleading for Community Councils.

### **2.8.2 Impact on Durno/Whiteford**

The Orange route option bisects the Durno / Whiteford school catchment area and local community. If this option is retained the final design must ensure that the local road (C83C) is not severed by the dual carriageway and designers must work closely with local landowners and communities to minimise adverse impacts.

### **2.8.3 Traffic Issues Around Inverurie**

While Inverurie is located outside the BCC area, the situation in Inverurie is directly relevant to BCC residents. The lack of services in the BCC area means that many local residents routinely visit Inverurie for professional (e.g. banking, legal and medical) services as well as shopping. It was apparent from information provided and discussions held during the Virtual Community Council Forum (29 January 2021) that the Orange option will not solve traffic problems in Inverurie, particularly HGV and commuter traffic from Oldmeldrum and new developments north / east of the river Urie. To provide enduring

benefit to the area, any solution for the A96 corridor must alleviate traffic problems in and around Inverurie.

#### **2.8.4 Bennachie Special Landscape Area**

The Orange route option cuts into the Bennachie Special Landscape Area (SLA). This defeats the objective of SLA designation and is not acceptable.

#### **2.8.5 River Don and Urie Crossing**

One reason cited by Amey Arup for preferring the Orange route option is to avoid an expensive crossing of the River Don and railway line east of Inverurie on the Violet option. However, the Orange route option also requires a Don crossing south west of Inverurie, albeit a shorter one and a crossing of the River Urie, existing A96 and railway at Inveramsay. During previous consultations BCC was advised that the crossing of the River Urie, existing A96 and railway at Inveramsay would be a major engineering challenge.

#### **2.8.6 Cost**

The Orange route option is more expensive, whereas the Pink and Cyan recommendations were driven by selecting the cheapest options.

### **2.9 Comments on the Pink and Brown Route Options**

#### **2.9.1 Protection of Prime Agricultural Land**

Aberdeenshire, with only 9% of Scotland's arable land, produces 27% of Scotland's total output of cereal crops including one third of the national malting barley requirements. The main reason that Aberdeenshire "punches above its weight" in this respect is because it is fortunate in having a relatively high proportion of its arable land graded under the Macaulay Land Capability for Agriculture (LCA) classification as Prime Agricultural Land (PAL). Much of Aberdeenshire's PAL lies in the area of West Garioch most affected by A96 dualling. Aberdeenshire's PAL is a precious and strategically important national resource, which will become increasingly important for local and national food security as the effects of climate change, a rapidly growing global population and increasing geopolitical instability threaten the security of supply and price stability of food imports. Moreover, agriculture has been at the heart of the local economy for many generations and will continue to be so long into the future. Final route selection must consider the value of land affected by dualling: yield and value of crops; minimising compaction and other physical damage in the construction corridor which reduces the value of any land returned to agriculture and avoiding fragmentation of agricultural holdings isolating smaller parcels of land which are then not workable by modern agricultural techniques.

Where agricultural holdings are bisected the project should ensure there is adequate access to isolated tracts of land for both animals and farm machinery, preferably by underpass.

### **2.9.2 Visual Impact**

While the project asserts that the Pink route option will be “less visible” from higher elevations such as Bennachie, the Pink route option is in fact clearly visible from Bennachie and Bennachie will be visible from it. Bennachie is a prominent, well liked and much frequented local feature – route selection and design should minimise visible impact from Bennachie, but should also minimise visible impact from all settlements within the BCC area.

## **3. Feedback from Residents**

Many residents have strong views on the dualling of the A96. While the following are not evidenced as majority views and not represented as such by BCC, they are included as they are indicative of the feelings of a significant number of residents.

### **3.1 Traffic Volume and Climate Change**

A new dual carriageway is a 20th-century idea in an era when we need urgent 21st-century solutions. Current traffic figures between Huntly and Aberdeen are already marginal in meeting DMRB dualling requirements. The pandemic has demonstrated that many people can work from home and commuting patterns are likely to be changed permanently. The managed decline of the oil industry to meet government energy transition targets means that industrial activity in north east Scotland and related HGV traffic will decline. The plan to dual the entire length of the A96 regardless appears to contradict the Scottish government’s commitment to adapting to climate change, building back better after the pandemic and the specific Transport Scotland target to “reduce car kilometres by 20% by 2030”.

### **3.2 Relative Value/Benefit to Taxpayers**

While the project is intended to bring economic benefits along the A96 corridor, it is not evident what economic gains will accrue in the BCC area. Many residents consider that prioritising accelerated investment in high capacity, high speed broadband may bring much more benefit for rural areas.

### **3.3 Loss of Important Recreational Space**

The Orange route option will result in the loss of popular amenity west of Inverurie. The road would disrupt access to the Aquorthies Stone Circle, the Newseat Community Woodlands and the Polinar circular route, all accessed frequently by people of all ages to promote their physical and mental health and wellbeing.

### **3.4 Inveramsay Disruption**

Residents, rural businesses and landowners in Inveramsay have already endured an extended period of disruption as a result of the installation of the bridge to take the A96 over the railway line. A further (probably longer) period of disturbance during the construction of a dual carriageway is (at best) unwelcome. The proposed Orange route would mean that there are a dual-carriageway trunk road, two de-trunked roads and a railway within close proximity of residences, and that some properties will be overlooked from front and rear. The design should ensure that impact on existing properties is reasonable and suitable measures to reduce visual and noise impacts should be incorporated. The proposed design will disrupt access to amenities such as Goval Woods.

### **4. Conclusion**

BCC appreciates that an extension to the consultation period was agreed to allow us a more reasonable time period to understand the implications of the proposal for our area and to represent the views and interests of our residents. Comments provided by BCC will be relevant throughout the DMBR Stage 3 evaluation, not just in the current option selection and should be reflected when the final design is brought forward.

**Submission authorised 8/3/21 by Sarah Robinson  
Chair of Bennachie Community Council**