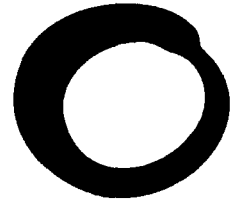


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**Friends of
the Earth
Fife**

National Planning Framework Team
Victoria Quay
Edinburgh

Dear Sirs,

Thank you for this opportunity to make comments on the draft NPF2. Our comments are related to some of the projects near the Kingdom and to the overall approach.

While there are things to be welcomed in the draft, the national priorities chosen are at odds with the sustainability arguments advanced in the draft and the available evidence on sustainability.

The Scottish Government has stated that, "*this Government has pledged to govern in the Scottish national interest and taking action on climate change is clearly in our national interest.*" [1] The draft NPF2 must be evaluated against the objective of **an 80% cut in greenhouse gases by 2050**. If the draft NPF2, or any part of it, does not align with this objective then that part, or the whole thing, must be revised so that it does.

Map 6 of the draft NPF2 highlights the areas with large carbon dioxide emissions in red. Given the objective of an 80% cut, any projects in these red areas need to be evaluated particularly thoroughly with regard to their effect on greenhouse gas emissions. However, these areas are the places where projects designed to increase greenhouse gas emissions have been rammed through, the M74 extension being the obvious example.

"Replacement" Forth Crossing

This projects fails on emission cuts criteria alone and must be deleted from the final NPF2. Despite the claim of party politicians there is no consensus on this project. It will increase emissions by inducing extra traffic. SACTRA specifically mentioned river crossings in their 1994 report. There is a full exposition of these points in our response to your consultants Jacobs/Arup, which is attached [2]. It is in one of the red areas of your map 6.

The project also fails on social equity grounds. Spending £4,200 million on car based commuters means that it is impossible to spend that money on other projects of benefit to Fifers. The alternative of spending £100 million on fixing the existing bridge and using the £4200 million on useful projects is a no-brainer.

It is also impossible to build an additional bridge before potential lorry bans and the like on the existing bridge. Much of the “justification” for an additional bridge has been a mass media/party political panic that the existing bridge is about to fall down and lorries will be banned from it by 2013. According to your consultants an additional bridge cannot be built before 2016 or 2017, which means it will not prevent any possible lorry bans. Thus much of the “justification” is hot air.

The “replacement” bridge project must be replaced by a series of measures to manage car based commuting in line with emissions targets. We should ensure that existing bridge is repaired and maintained properly with some of the money.

More jobs should be provided in Fife, not just boxes for commuters to live in, with walking and cycling to these a priority.

For those still working outwith Fife there should be more bus priority. Additional bus and rail services should be provided to the west and south Edinburgh to allow better access to areas which are not currently well served by direct public transport.

The deck of the current bridge has been destroyed by too many large lorries, subsidised from general taxation. As part of the project to fix the existing bridge, lorries (especially from north of the Firth of Tay) should be routed via Perth. This is the best way to England and further south anyway. In addition more rail based and sea transport options should be provided.

Electrification of all lines in Fife to allow for longer and faster trains, together with the proposed line from Inverkeithing to Halbeath (Para 215) are worthwhile projects. They will benefit passenger and freight services. There is no need for the new line to be a green fig-leaf for an additional road bridge. It can be built without an additional road bridge.

These would be funded by using the money currently intended to be squandered on an additional road bridge. We note that you are already building an additional Forth road bridge at Kincardine. Just how many additional Forth road bridges do you want to build?

Edinburgh Airport expansion

This project fails on emission grounds and thus must be deleted from NPF2. Aviation is the fastest rising sector of greenhouse gas emissions and Edinburgh airport is in one of your red zones.

The project also fails on equity grounds. It is the relatively well off who use aeroplanes, despite assertions to the contrary by some. Helping middle class people to go on hen nights in Prague is not a good use of good agricultural land.

NPF2 should seek to convert aeroplane trips to the south to train trips, via a high speed line. That will leave plenty of capacity at airport for remaining services. We approve of current downsized rail link, which is in keeping with future role of the airport. The Dalmeny Chord is not related to airport expansion and NPF2 should not attempt to link the two things.

Grangemouth and Rosyth port expansions

Provided specific conditions are met we do not object to measured port expansions.

In the case of Rosyth a condition of any expansion must be that a railway connection is brought into use, for passenger and freight services, as an integral part of the expansion. It must not be a token green gesture with the odd service, but an integral part of the expansion.

This expansion also appears to be a stalking horse for the dreams of the road lobby to tarmac more of west Fife. We do not object to some small scale road improvements. However, the proposed large scale road "improvements" fail on safety and greenhouse gas emission grounds. The dockyard is in one of your red zones. A large road has already been built to the east of the dockyard, there is no reason to build another large road to the west. If necessary the existing large road can be extended through the dockyard proper. To the north of the dockyard itself there is a strip of land to Hilton Road which could accommodate this road extension.

Electricity grid

The current approach is based entirely on large scale generation feeding loads, the traditional model in Scotland since the late 1960s, which saw your predecessors replace the hydro-electric programme with dinosaurs like Longannet and Torness. This must be revised into a strategy for sustainable use and generation. While that will include many of the elements identified to take electricity from large wind and water powered plant, it must also allow for smaller scale renewable generation.

There must be a strategic programme to eliminate fuel poverty by insulation and better building systems. Some of the money saved by not building additional Forth road bridge can be used for this.

For the residual energy, a programme based on local generation of heat and electricity wherever possible is necessary. Large scale wind farms will have a place in this, if only for export to England. Strengthening of grid for this should be part of a programme to expand wind generation. This must not be held up by arguments about underwater cables.

Overall comments

In the presentation on 14/4/08 it was mentioned several times that nearly all party politicians had voted for this approach. This was presented as being a good thing. The evidence over many years is that something which has large scale support from most political parties is nearly always a bad thing. The additional Forth road bridge is a case in point.

The reform of the planning system was an excellent opportunity to improve and speed it up. However, that opportunity was ignored. The current system gives even less opportunity to the public to influence it, rather it transfers even more power into the hands of big business and their acolytes party politicians and officials. The end result will be the sort of unsustainable projects proposed in the draft NPF2 being rammed through, with the only "discussion" of these projects being two months in Holyrood, where many party politicians are told how to think and what to vote for by text messages from party HQ. if it was not so serious it would be amusing.

The system you have produced has no credibility. The incredible defensiveness of the speaker on 14/4/08, when challenged over the very poor nature of that meeting, demonstrates conclusively that officials are either unable to grasp what a participatory planning system involves, or are scared of the public having a real say on planning matters in case they disagree with the view of those inside the tent.

The end result of this lack of transparency and exclusion of the public is likely to be a repeat of the direct action seen over issues like Torness and the M77. Direct action seems to be the only thing which gets through the skulls of officials and party politicians. It is a great pity, but that is the measure of your failure.

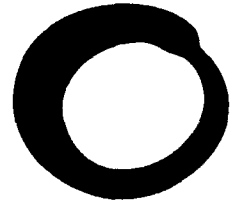
This document was prepared by David Hansen, but has been circulated to the group and the comments received incorporated into the finished document.

20/4/08

[1] <http://www.scotland.gov.uk/Publications/2008/01/28100005/1>

[2] Additional Forth Road Bridge response from FoE Fife.pdf

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**Friends of
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Fife**

Jacobs Arup
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Dear Sirs,

Your letter of 25/3/08 to the Forthright Alliance has been copied to Friends of the Earth Fife. In your letter you state that, "*To assist us at this stage we would appreciate any comments you may consider relevant to the environmental assessment.*" We would like to make the following observations to help you.

In your Annex A one of your bullet points is, "*establish key environmental issues*". The key environmental issue facing us is global climate change. Any environmental impact assessment that is worth the paper it is written on must address this issue and that is what our main comments are about.

We know from the study commissioned by Sustran that an additional bridge would cause a 55% increase in traffic over 10 years; a 190% increase by 2026 and that by 2031 all additional road capacity would have been used up [1]; in other words, within 15 years of an additional bridge opening, traffic congestion would be no better. The study assumed that bridge tolls remained on both the new and existing bridges, with charges increasing yearly in real terms. However, tolls have now been scrapped for all crossings, and a study presented in parliament [2] confirmed that this will increase Forth Road Bridge traffic by 10%. Thus future increases in traffic levels are likely to be greater than even the Sustran study suggests.

To back the Sustran report up, in 1994 the Standing Advisory Committee on Trunk Road Assessment (SACTRA) concluded from exhaustive research that new roads generate extra traffic and congestion [3]. Therefore it is counter-productive to build an additional road crossing, and indeed the previous "predict-and-provide" road policies are now widely discredited. SACTRA indicated that induced traffic is a particular phenomena for additional road capacity built across large rivers.

In the absence of some fantastic unforeseen change to motor vehicle engineering these additional motor vehicles will be pumping out more greenhouse gasses into the atmosphere, as well as causing additional danger to the Fife community and leading to even more pressure to concrete over more of the Dunfermline area with "executive" houses for car based commuters.

We question how this strategy fits in with the need to reduce greenhouse gas emissions by at least 80% by 2050. Such targets are about to be enacted by your client the Scottish Government, in their proposed Climate Change Act. Your client has already stated that it intends to implement an "ambitious programme to tackle climate change" [4].

An environmental impact assessment that is worth the paper it is written on must address this issue directly and state that an additional bridge cannot be justified on climate change grounds.

We are also concerned by the dishonesty of the assertion that the proposed bridge is a "replacement". It is nothing of the sort. Although a budget line for knocking down the existing bridge was eventually dragged out of your client, all the reports we have seen speak of using the existing bridge alongside the "replacement" bridge [5].

This environmental impact assessment can hardly be considered credible when even the title of the project is dishonest.

On a broader canvas, our experience of this sort of thing is that they are cynical exercises tailored to "legitimise" a decision which has already been made. Thus we do not spend too much time on them. Not only might this be seen as supporting a process which is designed to avoid carrying out a true environmental impact assessment, but it also wastes the scarce time of our members for little or no gain. We live in hope that one day our misgivings about these things will be proved wrong, but this has yet to happen. Perhaps you will break the mould.

We hope you find these comments of use. We would appreciate being kept up to date with your environmental impact assessment so we can measure if our misgivings are being proven to be wrong. Our e-mail address is on this response.

This document was prepared by David Hansen, but has been circulated to the group and the comments received incorporated into the finished document.

References

[1] MVA consultants (2003) Sustran Integrated Transport Corridors Study - final report, p.19 <<http://www.sestran.gov.uk/SITCoSFinalReport.pdf>>

[2] Report by Steer Davies Gleave <<http://www.scotland.gov.uk/Topics/Transport/Road/toll-bridges/TollImpactStudy>>

[3] Standing Advisory Committee on Trunk Road Assessment (1994) Trunk Roads and the Generation of Traffic: "where the existing network is sparse and a large change in network quality occurs as a result of a scheme (for example, the Humber Bridge), significant quantities of induced traffic are unambiguously observed." (p.165, §11.05) ('Induced traffic' is the term given to extra vehicle journeys generated by the opening of a new route.) The research also states that induced traffic is most significant in "roads in and around urban areas, estuary crossings, and strategic capacity-enhancing inter-urban schemes (including motorway widening)." (p.170, §11.23 and 15.05)

[4] 3 Scottish Government news release "Scotland's Budget and Spending Review", 14 November 2007.
<<http://www.scotland.gov.uk/News/Releases/2007/11/14081839>>

[5] For instance Transport Scotland, Forth Replacement Crossing Study, Report 5, Executive Summary: no mention of removal of the existing bridge but suggests using it alongside the "replacement" crossing.
<<http://www.transportscotland.gov.uk/uploads%5Cdocuments%5CFRCS-Report5-Non-Technical-Summary26-06-07.pdf>>