HEARING

1. PUBLIC HEARING IN RELATION TO THE APPLICATION (REFERENCE NUMBER - 111281) FOR PLANNING PERMISSION FOR CONSTRUCTION OF A HOUSEHOLD WASTE RECYCLING CENTRE INCLUDING CONSTRUCTION OF ACCESS ON HAZLEHEAD AVENUE AND ANCILLARY WORKS AT GROVE NURSERY, HAZLEHEAD AVENUE, ABERDEEN.

The Hearing was opened by the Convener who extended a warm welcome to all present and explained that the Hearing was being conducted under the provisions of the Planning (Scotland) Act 2006 and the Scottish Government Circular 4/2009, Development Management Procedures, under which the local planning authority had discretion on the requirement for a Hearing on a planning application. She explained that the Hearing was required as the application met the requirements having attracted considerably more than 20 objections; involved land in which the Council had an interest; and was a departure from the development plan.

The Convener made it clear that the purpose of the Hearing was for the Sub Committee to listen to the representations made by all parties and for officers to take cognisance of the various points made for consideration as part of their final evaluation of the proposal. She explained that elected members had visited the site and its environs immediately prior to the Hearing. The Convener outlined the procedure to be followed and emphasised that elected members should not express any opinions prior to consideration of the final report, which would fall to a future meeting of the Sub Committee for determination.

The Convener invited Mr Alex Scott, Senior Planner, Aberdeen City Council, as the first speaker to address the Sub Committee. Mr Scott described the application proposal, advised with regard to the policy background and the main issues arising, and identified the nature of the concerns expressed by consultees and objectors. His presentation to the Sub Committee was in the following terms:-

This application which is subject of today’s hearing was submitted by SITA on 30th August 2011 and registered under Reference Number 111821. It is acknowledged and registered that SITA operate as contractors regarding the waste management function of Aberdeen City Council. The proposal is for the location and
development of a domestic recycling centre for the disposal of household waste within the western part of Aberdeen City.

The area of land involved extends to 1.2 hectares and is located in the north-west corner of the Grove Nursery site which lies along the eastern boundary of Hazlehead Park. The proposal would involve the formation of a new access for both private cars and larger service vehicles through an existing privet hedge directly off the south side of Hazlehead Avenue to provide access and egress from the facility. The facility would comprise a range of waste receptacles arranged in a loop around the central area of the site with a roadway round the outside to allow access and offloading of domestic waste from private vehicles. The core area will be used by service vehicles for the collection of full and the delivery of empty containers, no public access will be allowed within this service area.

The opening hours for the Household Waste Recycling Centre (HWRC) are 10.00am to 8.00pm weekdays and 9.00am to 8.00pm on weekends, with shorter hours during winter, closing at 5.00pm. Peak hours are assessed as late morning and mid afternoon with a peak flow of 115 vehicles per hour on weekdays increasing to 168 at weekends. The facility has been designed to accommodate a peak hourly flow of 170 vehicles per hour thus preventing queuing outwith the site out on to Hazlehead Avenue. The annual throughput of waste from the facility will be a maximum of 8,000 tonnes per annum. Service vehicles will result in a very low level of 20HGV movements (10 trips) during the busiest month (August) through more normally only 6 or 7 per day.

The site is located 500 metres to the west of the Queens Road roundabout junction with Hazlehead Avenue. To the north of Hazlehead Avenue there is the local Hazlehead Primary School located 350 metres from the site. On the south side of Hazlehead Avenue, and 250 metres from the site, is a housing development in Queens Grove. The nearest houses are in the Hazlehead development 200 metres to the north. Hazlehead Secondary School is located to the west of Groats Road 600 metres to the north-west. Other features of note in the vicinity include the Queen Mother Rose Garden in Hazlehead Park 630 metres to the west, beyond the Piper Alpha Memorial which is located 600 metres from the site.

The immediate vicinity of the site is bounded by playing fields north and to the west, the grounds of Grove Nursery to the east and to the south, with the residential area south of Hazledene Avenue 300 metres to the south. There is a hard surfaced coach and car park for Hazlehead Park immediately adjacent to the north-west corner of the site. There is a wide grass verge along the south side of Hazlehead Avenue interplanted with trees and a separate footpath/access track along the north side. There is a series of traffic calming speed bumps along Hazlehead Avenue which reduce traffic speed to the recommended 20mph and they are to remain.

The operation will be undertaken within an area of hardstanding of 0.69 hectares in area and will include embankments in the north-west corner of the facility to permit the offloading of heavier items into skips at a lower level. The inner edge of this
split level will be retained by a concrete wall. The perimeter of the site is to be landscaped. A brick built amenity building, 6.0 metres wide by 7.5 metres in length is also provided for staff use and will be located at the mid point of the access road along the eastern boundary.

Apart from the site access (which will be secured by a timber clad gate when the site is closed) the whole perimeter of the site is to be screened by existing landscaping supplemented by new infill planting to screen the site operations from external view. This new planting would add to the existing poplar and conifer trees along the site edges by new planting with shrubs, trees and a hedera security fence, a metal fence with ivy grown through the lattice work which is evergreen, visually neutral and secure. Specimen trees are to be planted to replace the five lost in the formation of the access and these will be supplemented by native shrub planting to reinforce the site boundaries along the west, east and southern boundaries. There will also be amenity groundcover planting within the site to screen the amenity building and in the corners of the site.

Following receipt of the application, neighbour notification and local press advert was undertaken with 5th October being the last date on which representations were accepted. The application was accompanied by the plans (on display) which indicated the layout and circulation pattern within the site, a planning and design and access statement, a transport statement, a noise impact assessment, an ecological impact assessment and statement of community involvement. With reference to this last item of work it should be noted that this application is classed as a minor application in the Hierarchy of Developments regulations and did not strictly require pre-application consultation to be undertaken. It has also been assessed that the application does not require to be supported by an environmental impact assessment. It is accepted that the above studies are satisfactory in allowing a full evaluation of the proposals.

Consultations were undertaken on this documentation, with the following responses:-

Roads - no objection, the impact of the development is well within the capacity of the road network.

Environmental Health - scope of assessment acceptable though certain details required further analysis, will include up-to-date information in presentation.

SEPA (Scottish Environment Protection Agency) - required the preparation of a drainage statement, this has been prepared and awaiting final comment.

Craigiebuckler and Seafield Community Council - the local Community Council is accorded the status of a formal consultee and submitted a strong objection to the application, the main concern being that as the site is within green belt, the proposal amounts to an unacceptable departure from the adopted Local Plan.
A substantial body of objection has been received regarding this proposal though it should also be borne in mind that three letters of support have also been received. A detailed appraisal of all the points made is included in the committee report but the main thrust of the objections is that whilst all parties agreed on the requirement for a HWRC in the west of the city this site located on the entrance to Hazlehead Park is totally wrong and unacceptable to the local community. Other concerns relate to the impact and hazard associated with traffic, the proximity to local schools, the effect on amenity in the area and the deleterious effect on the setting and the entrance to Hazlehead Park. Particular objection is made to the effect on the tranquil setting of the Piper Alpha Memorial and the adjacent Queen Mother Rose Garden within the park.

National initiatives on waste management are addressed in documents such as Scotland’s Zero Waste Plan which emphasises the reduce/reuse and recycle approach, with the objective to reduce the proportion of municipal waste going to landfill to 5% by 2025, accompanied by recycling targets of 40% of municipal waste by 2010, 50% by 2013, 60% by 2020 and 70% by 2025. The National Planning Framework for Scotland 2 identifies that the planning system has a crucial role to play in ensuring that installations are delivered in time to allow waste management targets to be met. Scottish Planning Policy (SPP) notes that managing waste as a resource has an important role to play in achieving sustainable growth and a greener Scotland and refers to the zero waste goal and the targets set out in the Zero Waste Plan.

The emphasis of this presentation has been on the description of the various procedures undertaken and the factors which require to be taken into account in consideration of the application. It is considered that this process has been impartial and there will be no evaluation of the application undertaken at this stage. It is proposed that the findings of this hearing will be taken into account in the report on the proposal and assessment of the application on its planning merits to allow determination by a following committee.

Mr Scott responded to questions from members and the following information was noted:-

- the Grove Nursery site is not part of Hazlehead Park but part of the policies
- the speed bumps referred to on Hazlehead Avenue are classified as speed tables
- there will be no access to the proposed HWRC from Hazledene Road
- the decision that no Environmental Impact Assessment is required had been made by officers upon receipt of the application in accordance with environmental regulations
- that new housing developments are required to have their own recycling facilities, therefore possible increased population in the west of the city as a result of new housing developments had not been taken into account
Mr Andrew Brownrigg, Senior Planner, Aberdeen City Council, was next to address the Sub Committee, and he made the following statement:-

I am here to speak briefly on development plan issues. The development plan comprises the Local Plan read in conjunction with the Structure Plan.

Aberdeen City and Shire Structure Plan

The Aberdeen City and Shire Structure Plan was approved in August 2009 and provides the strategic context to the development plan - it does not identify sites for waste facilities. The plan states that most waste is disposed of in landfill sites. However we need to make significant changes to manage this resource in an efficient and environmentally friendly way, in line with the ‘waste hierarchy’ and taking the ‘proximity principle’ into account. This will mean taking account of how we manage waste in an efficient way through preventing waste first, followed by reusing it, recycling, recovering value from it with disposal being the least sustainable option. It also means we need to provide new waste infrastructure as locally as possible in order to meet European targets.

Work is already underway to replace the current Structure Plan and a Main Issues Report for a new Strategic Development Plan is now out for consultation. This reiterates the need to provide alternatives to landfill and presents a number of strategic options for dealing with our waste. The preferred options are for us as a region to be self sufficient and deal with our waste locally, to only allow time extensions to existing landfills, as opposed to extending or allowing new landfills, and concentrating waste infrastructure closer to Aberdeen, where the largest concentrations of waste arise. These options are designed to help the region to meet the Scottish Government’s Zero Waste Plan targets of:-

- Limiting the amount of waste going to landfill to 5% by 2025
- Recycling at least 70% of all waste

Aberdeen Local Plan 2008

The current Aberdeen Local Plan was formally adopted in June 2008. The Grove Nursery site is zoned as green belt but is also identified as OP69 - an opportunity for a sports/tennis centre or recreation and countryside uses and other uses appropriate to the rural character of the area.

Policy 28 Green Belt states in section 1 that no development will be permitted in the green belt for purposes other than those essential for agriculture, forestry, recreation, mineral extraction or restoration or land renewal. Section 3 of the policy identifies OP69, Grove Nursery, as suitable for indoor sports uses. Section 7 requires that all proposals for development in the green belt must be of the highest quality in terms of siting, scale, design and materials. All developments in green belt should have regard to other policies of the Local Plan in respect of protection of landscape, trees and woodlands, natural heritage and pipelines and control of major accident hazards.
Local Plan Policy 19 deals with Waste Management Facilities. This states that in order to meet the requirement of the EU Landfill Directive and the Area Waste Plan, there is a need to provide a number of new waste management facilities including, amongst other things, recycling centres.

Any proposal for a waste facility will be considered in terms of the need for it, its proposed location, its duration and viability, and its compatibility with the North East Area Waste Plan, National Waste Strategy and National Waste Plan. (It should be noted that these documents have been replaced by the Zero Waste Plan, Scottish Planning Policy and other documents.)

Regard will be had to the effect on local amenity, agriculture, nature conservation, landscape, visual impact, scientific and archaeological interests, water and air quality, water resources, listed buildings and conservation areas, access and the highway system, and air traffic, whilst taking into account any measures designed to mitigate the impact of the proposal.

The policy states that the City Council supports the development of a network of reclamation and recycling facilities in order to ensure that all areas of the city enjoy reasonable access to such facilities. Waste management sites are identified on the proposals map.

We recognise that this application constitutes a departure from the Development Plan as the site is zoned as green belt and is not identified for a recycling centre in the adopted Local Plan.

Aberdeen Local Development Plan - Proposed Plan 2010

The Aberdeen Local Plan is currently in the process of being replaced. The Proposed Aberdeen Local Development Plan was approved by the Council in August 2010. In this Plan the Grove Nursery site is identified for two proposals, OP66 and OP67. OP66 covers 5.9 hectares and is identified for indoor sports use and is zoned as green belt. OP67 is identified as a recycling centre.

In terms of the site selection of Grove Nursery, the Transformation Strategy for Waste Management Services which was approved by Council on 13th February 2008, identified the need for a new Recycling Centre in the west of the city.

Consequently, in 2009, a site selection process was established by waste management officers, working with colleagues from Asset Management, Planning and Roads and Transportation. Twelve possible sites were assessed against a number of planning, transportation and deliverability criteria. Grove Nursery emerged as the favoured option and the Housing and Environment Committee of 13th April 2010 approved the north-west corner of the site as the preferred site for a recycling centre.
Following the decision of the Housing and Environment Committee, the north-west part of Grove Nursery was identified in the Proposed Local Development Plan as OP67, an opportunity site for a Recycling Centre. This covers around 1.5 hectares and is zoned as Policy CF2 New Community Sites and Facilities. This policy states that recycling centres shall be located on easily accessible sites and shall not be detrimental to residential amenity. Policy R4 - Sites for New Waste Management Facilities safeguards a number of sites for waste related uses including OP67 Grove Nursery as a recycling centre to serve the west of the city.

Representations on the Proposed Local Development Plan were invited for a 3 month period between late 2010 and early 2011. There was a combined total of 61 representations to the two proposals at Grove Nursery, almost all of which were objections related to the recycling centre. The Plan is currently with the Scottish Government and undergoing examination by Reporters. They are examining the representation made on this and other topics, alongside the Council’s response to them. It is anticipated that their recommendations will be made available around the New Year.

What Happens Next

In terms of what happens next, we do not know what the Reporter’s recommendation on this proposal will be. However, their recommendations are largely binding on the Council. Once the Reporter’s Report into the Examination is received, the Council has 3 months in which to follow adoption procedures. We anticipate that the Local Development Plan will be adopted in early spring of next year, at which point it will replace the current 2008 Aberdeen Local Plan.

Mr Ken Neil, Senior Engineer, Aberdeen City Council, made the following statement regarding transportation and accessibility issues:-

1. Location

The development site lies within the Grove Nursery and will occupy approximately 0.98 hectares at the north-west corner of the site. The site is bounded by Hazledene Road to the south, Hazlehead Park to the west, Queens Grove to the east and Hazlehead Avenue to the north of the development. Hazlehead Avenue and Groats Road will provide the principle points of vehicular access to the site.

A Transport Assessment has been submitted in support of the application for the new Household Waste Recycling Centre which is anticipated to process between 5,000 and 8,000 tonnes of household waste per annum and provide for the recycling of an extensive range of materials. The assessment has been audited by roads officers who are satisfied that the contents reflect the current road situation and future impact of the site.

2. Site Access
The site access will take the form of a priority ‘T’ junction between the development site and Hazlehead Avenue. At present Hazlehead Avenue is considered to be a lightly trafficked road. The junction will provide vehicular and pedestrian access via the north eastern corner of the development site. The junction has been designed to facilitate the access and egress of larger vehicles associated with the operation of the site and designed in accordance with current design guidelines and in compliance with Aberdeen City Council’s Development Guidelines. The access junction has been tested with the predicted development traffic flows and is shown to operate satisfactorily during the peak periods of usage.

To accommodate pedestrian staff access, a 2 metre wide pedestrian route is to be provided along the west side of the junction facilitating pedestrian movements between Hazlehead Avenue and the development. Within the site, pedestrian walkways will be delineated using appropriate signing and lining. Due to the nature of the site it is not anticipated that significant levels of pedestrians will access the site. A posted speed restriction of 10mph will be enforced within the recycling centre to promote safety.

The proposed recycling facility will have spaces for 22 cars with surveys indicating that the average time for a visit will be 5-8 minutes. The provision of a second lane around the perimeter of the operational area will also allow additional vehicles to wait within the site meaning that potentially the site could accommodate as many as 40 vehicles at any time, reducing the risk of vehicles queuing out onto Hazlehead Avenue. The applicant will also ensure that staff will be on duty at the gate to advise drivers of the appropriate area for their goods.

3. Local Road Impact

Surveys were carried out in March and a seasonally adjusted increase of 60% was applied to take account of potential higher summer traffic flows. The midweek peak hour (15.00 to 16.00) was assessed at present day traffic flow levels as 150 vehicles on Hazlehead Avenue and the weekend peak hour (11.00 to 12.00) was assessed as 270 vehicles. 5% of this traffic was HGVs. A comparison was made with counts carried out at the end of May this year, which showed midweek peak hour flows of 101 and weekend peak hour flows of 124. We are therefore satisfied that the flows being used for analysis are reflective of any potential higher usage during the summer period. Also, while it is likely that vehicular traffic numbers on Hazlehead Avenue will increase during the summer months relative to those recorded in March, it is unlikely that the additional midweek trips will occur during the peak hour identified for assessment. During this time, the majority of the population will be in employment or travelling from work to home and unlikely to be travelling to and from Hazlehead Avenue.

Based on surveys of existing recycling centres in the area including one at Westhill, it is estimated that this recycling centre will attract 115 vehicles in the midweek peak hour and 170 during the Saturday peak hour. It is also assessed that 3% of
this traffic would be HGVs. The proposed development is therefore likely to generate a total of 660 vehicles entering and leaving the site per day with about 20 of them HGVs. It has been assessed that 90% of site traffic will enter Hazlehead Avenue from the roundabout at Queens Road and 10% via Groats Road. The existing average daily total on Hazlehead Avenue has been calculated as 1,430 vehicles with the proposed development generating 1,320 vehicles giving an 83% increase in traffic on Hazlehead Avenue. Hazlehead Avenue is 6.6m wide and the theoretical link capacity for a road of this type would be around 1,800 vehicles per hour (two-way flow). The maximum hourly traffic flow has been calculated as the Saturday peak hour flow of 578 vehicles which would still be well within the theoretical capacity of the road.

The increase in the volume of traffic on Hazlehead Avenue it will not have any significant impact on the adjacent junctions during the peak periods of generation for the site with all the junctions being well within capacity both before and after the development. There is existing weekday evening peak period congestion at the Hazlehead Avenue/Queens Road junction but this would be a period of lower generation for the site and although there would be slight increase in delays at the junction this would not be considered significant. It also has to be considered that some of the traffic associated with the development will already be on the road network and travelling to existing sites.

4. Pedestrian Safety

There are two schools in the vicinity, one a primary school and the other a senior secondary school. There should be little impact on the secondary school located on Groats Road, however there is an existing pedestrian access to the primary school from Hazlehead Avenue.

The opening times of the recycling centre is 10.00 to 20.00 during weekdays in summer and 10.00 to 17.00 during the winter months and so there should be no conflict with school children in the morning. Pedestrian counts during the weekday peak hour (15.00 to 16.00) indicated 96 pedestrians on Hazlehead Avenue. This is higher than the other hours which is in the order of 3 to 24 pedestrians and so it is assumed that this would be school related and so there would be some conflict in the afternoon. However Hazlehead Avenue has remote footways along its length except where the footway changes sides and this is protected by a speed table and the speed limit on Hazlehead Avenue is restricted to 20 mph. Hazlehead Avenue has good vehicle and pedestrian visibility and the speed restriction measures of speed tables and the 20 mph speed limit will mean that average speeds will not be greater than 20 mph. The applicant recognises that there may be some conflict with pedestrians, particularly at the crossing point between Queens Grove and the development site and although nowhere near the threshold for a signalised pedestrian crossing the applicant has offered to install a pelican crossing at this location. Although this may appear to be an attractive offer it is generally not advisable to install a pelican crossing when it is so far below the recommended threshold.
5. Conclusion

While Hazlehead Avenue will be subject to increased traffic this traffic will be well within the capacity of the road and the proposed development can be accommodated on the road network. Surveys did indicate that during the afternoon peak midweek there are more pedestrians on Hazlehead Avenue than expected and this will be school related. However as there are good existing pedestrian facilities and vehicle speeds are restricted, therefore, it is considered that there is sufficient existing pedestrian provision to accommodate the development. The developer has offered to install a pelican crossing at this location but we would be reluctant to accept this offer as it is well below the threshold for a pelican crossing and it is generally not advisable to install a crossing when it is so far below the recommended threshold. However the Sub Committee should be made aware of this proposal. In conclusion, based on the information provided, the roads authority has no objection to this application.

Mr Neil responded to questions from members and the following information was noted:-

- only committed developments could be taken into account for the purpose of traffic impact on the roads network in relation to the proposal
- no vehicles are permitted on the pedestrian walkway adjacent to Hazlehead Avenue

Mrs Carole Jackson, Environmental Health and Trading Standards Manager, Aberdeen City Council, made the following statement in respect of environmental health issues:-

The application has been initially assessed from an environmental health point of view. Other than the potential for noise, there were no problems identified with the proposal.

As for many urban developments, environmental health has to consider the potential for noise nuisance from this development. A Noise Impact Assessment has been carried out on behalf of the applicant, and environmental health officers are currently involved in discussions with SITA and their noise consultants to obtain more data, in order to satisfy the environmental health service that the findings of the assessment are valid and that the assessment covers the worst case scenarios for the various noisy activities at the site.

SITA are currently gathering the requested information which will enable the environmental health service to carry out a final and full assessment of the noise issues and provide this information to the Sub Committee.

Mrs Jackson responded to questions from members and the following information was noted:-
potential noise arising from HGVs reversing had not been considered to be an issue
noise levels had been assessed at the site in its current form for comparative purposes
there had not been any complaints from neighbouring properties relating to noise arising from HGVs accessing the site in its current form

Mr Peter Lawrence, Waste and Recycling Manager, Aberdeen City Council, made the following statement in relation to waste recycling issues:-

Thank you for the opportunity to address the Sub Committee about this application. What I would like to focus on is how this application fits with national and local policies on waste and recycling. This may seem rather ‘big picture’ for a relatively modest development but it is within this context that the major benefits of such a facility can be seen.

Firstly, I would like to reinforce the message of both the Government’s Zero Waste Plan and the city’s waste strategy that simply dumping rubbish in the nearest convenient hole in the ground is a massive waste of resources, is environmentally damaging and, increasingly, is equivalent to throwing money down the drain.

But what in practice does this mean for Aberdeen? It means turning our services away from cheap and simple rubbish collections and providing household ‘dumps’ for bulky waste developed in the 1980s to an integrated and increasingly complex network of services and sites that allow the residents of Aberdeen to recycle and thereby gain value from our waste.

Aberdeen has made strong improvements in recycling and in turn diverting waste from landfill in recent years. Recycling performance has increased from a mere 7% 10 years ago to well over 30% today. But we are by no means alone in this progress, indeed in comparison to many parts of Scotland we remain a poor performer.

In 2010/11, of the mainland authorities, only Glasgow City had significantly lower recycling rates than Aberdeen and we remain 18% points behind the best authority.

Now clearly, direct comparisons may not be fair - the city’s population and housing mix makes achieving the high levels of recycling through comprehensive kerbside collection services more difficult than in other parts of Scotland. But collections are only one part of the solution and one area where Aberdeen falls behind many other authorities is the amount of waste recycled through its Household Waste and Recycling Centres.

The average recycling rate achieved across the existing Recycling Centres is approximately 40%; by comparison local authorities such as Perth and Kinross and
Fife consistently report rates in excess of 60% and individual sites achieve higher than 70%.

To make such a similar advance in Aberdeen would mean that the city would reduce its annual landfill tax bill by £380,000 per year and add another 5 percentage points to our recycling rate.

Developing well-run, clean, welcoming and high-performing Recycling Centres is an area of opportunity that the city must take hold of if we are to reduce our environmental impact, make savings against the ever increasing cost of landfill and reinforce the normalisation of a recycling culture in our city.

This application represents a true step-change from the crowded, limited and frankly unpleasant nature of some of the city’s existing ‘dumps’. This facility would be like nothing else we have in the city and so to consider it with the image of those existing sites in mind would be akin to thinking five years ago that the new Marischal College would look just like St Nicholas House.

So, I hope I have provided some context for the need for new Recycling Centres and what benefits they will bring but why do we need one in the west of the city?

We are constantly, and rightly, being urged to learn from best practice. That best practice suggests that Recycling Centres should be developed at a scale of approximately 1 hectare, provide for in the region of 50-80,000 households and have a good geographical spread across the authority. The existing sites we have in Aberdeen certainly do not have a good geographical spread nor are they appropriately sized - all four sites would in fact fit into 1 hectare: bluntly, we are miles behind the curve on this one.

There has been a long-standing recognition that there is a major gap in service provision in the central and western side of the city and, over the years, unsuccessful attempts have been made to find a site.

It was in recognition of this lack of service provision to the residents of the west of the city that the Transformation Strategy for Waste Management Services, adopted by Council in 2008, identified the need to rectify this situation.

Following on from this cue, the Council undertook an exercise to identify a site that should be brought forward to the planning stage. The applicant, as contractor to the Council, was instructed last year to prepare an application for this site but had no role in selecting it. Consequently, I feel it appropriate as the representative of the Waste and Recycling Service, I should provide an explanation of how the site was selected and demonstrate that alternatives have been considered.

Before I move on to this, I should just comment on the nature of land suitable for a Recycling Centre. It has been suggested that this activity should only be considered on industrial land. Whilst it is true that it would from a planning perspective be easiest to deliver this on land zoned for employment or 'industrial'
use, this could also be said to be the case for any non-housing development. The inference from this statement is that by preferring ‘industrial land’ that a Recycling Centre must be an ‘industrial activity’. This is not the case; whilst the site will attract traffic, there is no processing activity undertaken on site, no industrial plant installed and modest employment opportunities. Indeed, the Local Development Plan definition for this activity is that of ‘New Community facility’.

Coming back to the site selection process: firstly, I would like to stress that the consideration of other sites has been extensive, probably far more so than for very many applications brought before this committee.

However, the process was, by necessity, one of screening; this was a method of identifying a preferred site that would then be subject to the full scrutiny of a planning application.

Members may be aware that the costs involved in undertaking the range of assessments and preparing a detailed planning application for a facility of this nature is typically in the region of £50,000; for the Council to have underwritten such investigations across the 12 potential sites considered would have resulted in the expenditure of many hundreds of thousands of pounds merely to select one site for the application process and no guarantee of success.

There may be criticism of the screening process and I’m sure in the face of forensic examination, it may be seen as limited but the purpose was clear and a site was selected that appears to have no fundamental barriers to development, unlike many others considered. It is appropriate that this site is now subjected to the full tests of the planning process.

The process to identify and consult upon potential sites was undertaken in two phases.

1) Identifying Site selection criteria.

Local Community Councils in the west of the city, local Councillors and Council officers from relevant departments were consulted in late 2008 to determine what criteria sites should be compared against once they had been identified.

The purpose of this exercise was to ensure that the selection guide, presented in the form of a matrix, included issues that local communities felt were important.

Following this exercise, officers undertook a survey of potential sites, identifying sites by virtue of planning designation or potential for future development. These sites were then considered in a second phase of consultation that took the form of a written consultation and workshops with community groups and Council officials.

Community Councils and community groups in the west of the city were provided with a consultation pack. The consultees were asked to complete and return a scoring matrix and were invited to a workshop to discuss the sites in greater detail.
The consultation also asked for alternative sites that should be considered. No new sites were suggested during the consultation.

Craigiebuckler and Seafield Community Council, which changed from being a Residents Association to a Community Council during this process, was not identified as a local stakeholder until after the consultation packs had been sent out. To rectify this, a special meeting was arranged to gather the views of the Residents Association.

The information received through this process was considered alongside feedback from relevant Council officers when developing the report which went to the Housing and Environment Committee on 13th April 2010 and the north-west corner of the former Grove Nursery was identified as the preferred site.

Since the Grove Nursery site was chosen further discussions have been had with community groups and members of the public in the west of the city. At times, other, new sites have been suggested and investigated by Council officers: none of these sites have proved to be viable alternatives.

In conclusion, I would state that right from the start of this process, it has been clear that there are no ‘stand-out’ sites in the west of the city for a Recycling Centre; indeed if there had been, no doubt such a site would have been developed before.

I thank the committee for your time and urge due consideration of the substantial positive contribution that developments of this nature can give to the city.

Mr Lawrence responded to questions from members and the following information was noted:-

- no industrial plant would be installed onsite as part of the proposal
- there had been limited feedback from the consultation exercise on the 12 possible sites for a HWRC, however no community groups had expressed support for the preferred site
- the number of objections relating to the Grove Nursery site, before it had been chosen as the preferred site, were similar to those relating to the Kingswells Park and Ride site and the Hazlehead Caravan Park site - there had been fewer objections in relation to the other sites

SITA, as the applicant, was represented by Mr Martin Cracknell, who addressed the Sub Committee by way of a PowerPoint presentation in relation to the following:-

HWRC Planning Update

- Agenda
  - Introduction - SITA/Atkins
  - Pre-Application
The Site
Design
Consultation
- Transport Statement
- Noise Impact Assessment
- Ecological Impact Assessment

SITA Overview

- A leading recycling and resource management company servicing 12 million people in the UK
- Part of Suez Environment
- Environmentally responsible
- Operates:-
  - collection services
  - recycling
  - organic treatment
  - household waste recycling centres
  - energy-from-waste
  - and landfill sites across the UK
- Supports Scotland’s Zero Waste Policy

Atkins Overview

- Atkins is an international, design, engineering and management consultancy. Atkins are the largest engineering consultancy in the UK and the largest multi-disciplinary consultancy in Europe
- Atkins won four edie awards for Environmental Excellence at the end of 2010 including the top award for Best Environmental Consultancy, for the sixth consecutive year. The survey of the 50 largest environmental consultancies asks clients, consultants and industry peers to vote for the organisation they believe has the best reputation

Independence/Impartiality

- Atkins were selected as SITA’s consultants for the following reasons:
  - Technical ability
  - Relevant experience - Craigmiller Community Recycling Centre, Lower Polmaise HWRC, Dix Recycling Centre, Drayton Recycling Centre, Middlefields Recycling Village, Callender HWRC and numerous others
  - Standing within the consultancy industry

- Atkins works with Local and National Governments, regulated sectors and the private sector
  - Clients include:
    - European Commission
    - Ministry of Defence
Olympic Delivery Authority
Royal Bank of Scotland
Rolls Royce

- Sub-contractors appointed by Atkins via tendering process

What is a Recycling Centre?

- Also known as a Household Waste Recycling Centre (HWRC)
- Dedicated location to handle recycling and other materials produced by residents
- Aberdeen City Council currently has four HWRCs within the city
  - East Tullos - shared site
  - Sclattie - shared site
  - Pitmedden Road
  - Scotstown Road
- Current average HWRC recycling rate is 40%

Need for an additional HWRC

- Increased expectation of Scottish Government
- Requirements for west of city HWRC
  - Increased recycling
  - Landfill diversion
  - Reducing landfill tax
  - Meeting the need/expectations of the Scottish Zero Waste Policy
  - Current facilities are located in the north and south of the city

Pre-Application

- The site has been identified in the Aberdeen Local Development Plan ‘Proposed Plan’ (material consideration)
  - OP67 - Recycling Centre
  - Allocation following consideration of 12 sites by Aberdeen City Council Waste Management Team

Site Base Line for Development

Design

- Strengths
  - Strategic location is beneficial to serve the intended population
  - Site has been identified in the Aberdeen Local Development Plan ‘Proposed Plan’
  - Good vehicle access to the site
  - Established landscaping
  - Distance from receptors

Design Brief
• Considerations
  - Minimal visual impact - complete screening
  - No vehicle queuing on local road network
  - Minimise impacts upon local residents and amenities in the area
  - Design incorporates the need to maximise recycling and diversion from landfill - expectation of 70%+ recycling/diversion
  - To ensure the Council are meeting the expectations of Scottish Government policy

Pre-application Consultation

• Pre-application consultation was undertaken prior to the submission of the planning application
  - Liaison group established and meetings held to discuss proposal
  - Liaison group consists of representatives from local schools, parent councils, community councils, golf club etc.
  - Exhibitions held in May 2011
  - Leaflet drop (1,000 copies) was carried out prior to event with press releases to highlight the exhibitions
  - Well attended, all feedback comments have been included, both positive and negative, as part of the planning submission
  - Not expected by planning policy (PAN Regulations) to have exhibitions, felt it was important to do so

Design Visualisations depicting (1) aerial view; (2) entrance; (3) north to south; (4) south-west to north-east; and (5) western boundary.

Transport Statement

• Purpose
  - To assess the transport impact of a new HWRC on the surrounding area

• Process
  - In the production of the Transport Statement the following documents were consulted:

<table>
<thead>
<tr>
<th>National Documents</th>
<th>Regional Documents</th>
<th>Local Documents</th>
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<tbody>
<tr>
<td>Scottish Planning Policy 17 (Planning for Transport)</td>
<td>Aberdeen City and Shire Structure Plan 2009</td>
<td>Aberdeen Local Development Plan - Proposed Plan Sept 2010</td>
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Process (continued)
- The area and scope of study was agreed with Aberdeen City Council
- Traffic and pedestrian surveys were undertaken in line with current best practice. Survey contractor appointed via competitive process.
- Variation of flows during the year considered within assessment
- Sensitivity testing undertaken to provide robust estimation of future pedestrian/traffic flows
- All known committed developments considered within assessment
- Pedestrian analysis was undertaken to identify need for a formal crossing on Hazlehead Avenue

Findings
- National standards indicate Hazlehead Avenue has design capacity of 1,800 two way vehicle movements per hour
- Vehicle flows on Hazlehead Avenue are 152 during the weekday peak and 271 during the weekend peak
- Development will generate circa 115 during the weekday peak and 170 during the weekend peak
- Resulting vehicular flows on Hazlehead Avenue will be less than half of the road’s theoretical flow capacity
- Surveys show that 5% of Hazlehead Avenue traffic are Heavy Goods Vehicles (HGVs)
- With development in place, approximately 4% will be HGVs which is negligible given the design standard of the road and volume of traffic
- The road width is 6m which is the minimum width required for single lane by direction roads - this is wide enough to enable HGVs to pass each other
- Pedestrian survey was undertaken
  - Peak weekday between 14.00 and 17.00
  - Peak weekday between 09.00 and 12.00
- Pedestrian x Vehicle squared - calculation used to gauge the requirement for a formal crossing
- The results of this review demonstrated no requirement for a formal crossing to be introduced
- Offer to upgrade the crossing point on Hazlehead Avenue close to Hazlehead Primary School to a formal pelican type crossing, subject to local authority approval

Noise Impact Assessment

- **Purpose**
  - To establish the prevailing ambient noise at the site and to identify and evaluate the key noise impacts associated with the development

- **Process**
  - Consultation undertaken with Aberdeen City Council who approved the noise survey methodology
  - Followed the advice in Planning Advice Note 1/2011: Planning and Noise plus the associated Technical Advice Note
  - Methodology for noise assessment utilised
    - World Health Organisation 1999: Guidelines for Community Noise
    - BS8233:1999: Sound Insulation and Noise Reduction for Buildings - Code of Practice
    - Design Manual for Roads and Bridges (DMRB) Calculation of Road Traffic Noise (CRTN)
  - Noise monitoring was carried out in the vicinity of the site

- **Findings**
  - Chart depicting various noise levels. Expected noise from HWRC site at residential properties in area 43dB LAeq. Rating 48dB. Measured daytime background noise 40 to 46 dB LA90. Change in ambient noise with HWRC operating: less than 1dB. Measured daytime ambient noise - all sites 48 to 58 dB LAeq.
  - Lowest background noise levels and typical operational scenario
  - Sensitivity of nearest residential receptors: medium
  - Change in noise level: negligible
  - Significance of noise impacts: neutral/ slight
  - Traffic Assessment results used to determine the change in traffic noise levels on local roads
  - Greatest change expected on Hazlehead Avenue
  - Change in noise on Hazlehead Avenue: Increase less than 3dBA
  - Design Manual for Roads and Bridges impact classification: negligible

Ecological Impact Assessment

- **Purpose**
  - To evaluate the nature conservation value of ecological features present at the site, assess the significance of the effects of the proposed development on these features, and sets out proposed mitigation and enhancement measures
• Process
  - Walkover survey conducted in March 2011
  - Desk top study
    o Multi-Agency Geographical Information for the Countryside
    o Ordnance Survey data/maps
    o UK & North East Scotland Biodiversity Partnership (Aberdeen City Council) Biodiversity Action Plans
    o North East Scotland Biological Records Centre (NESBReC)
  - Local Environment Planner at Aberdeen City Council was consulted

• Findings
  - 3 District Wildlife Sites within 500m of the site, the proposed works will have no effect on these wildlife sites
  - None of the habitats within the site have intrinsic ecological value or are rare, vulnerable or priority habitats listed in the BAP
  - No confirmed evidence of red squirrels was detected during the survey
  - Habitats on site have the potential to support nesting birds
  - Some of the trees and vegetation have limited potential to support notable species

• Mitigation
  - Native shrubs and trees will be planted around the periphery of the site as suitable replacement vegetation
  - To avoid existing tree root damage contractors will follow BS5837:1991, Guide for trees in relation to construction
  - All vegetation clearance will be undertaken outside of the nesting bird season (Feb to Aug)
  - Red squirrel - if present work must stop and SNH must be consulted in order to agree a suitable approach
  - Foxes - if present SNH will be consulted regarding method of exclusion

Summary

• Material Considerations
  - The site is identified in the forthcoming Local Development Plan
  - The assessments carried out have shown that a HWRC can be developed at this site in accordance with national guidelines for Transport, Noise and Ecology
  - Increased recycling within the city (in accordance with Scottish Government expectations)
  - New purpose built facility for the local community - identified need in west of the city
  - Diversion from landfill resulting in reduced landfill tax charges

• Additional Considerations
  - Wide range of recycling materials
- Existing screening at site
- Educational opportunities for schools in respect of recycling

Mr Cracknell responded to questions from members, and the following information was noted:-

- no problems with flooding were anticipated and the drainage system was summarised - Scottish Water had not raised any concerns with the volume of water at the site
- containers would not be cleaned onsite, however there were no issues with odour at other recycling sites
- a ‘meeter and greeter’ member of staff would be in place at the site entrance to try to ensure that only household waste was being recycled
- discussions had been held with the Council regarding the impact of large events in the area, for example the Highland Games - the Council could close the HWRC on such one off occasions
- SITA were not targeting 8,000 tonnes of waste per annum, it was expected that the site would attract around 5,000 tonnes per annum, however a capacity of 8,000 tonnes was required for busy times
- SITA could not stop fly tipping close to the site, that would be the Council’s responsibility, however CCTV cameras would be in place and fly tipping was generally not an issue at other recycling sites
- if it was demonstrated that there was a need for a pedestrian crossing on Groats Road then SITA would be happy to consider the matter, however only 10% of the traffic was expected to use Groats Road
- there was no evidence of bats at the site
- the application had taken into consideration the nursery classes at Hazlehead Primary School, and the additional pedestrian and traffic flow outwith ‘normal’ school drop-off and pick-up times as a result of these classes

John Campbell QC representing Craigiebuckler and Seafield Community Council was next to address the Sub Committee and his statement was in the following terms:-

Good afternoon Convener. Thank you for the privilege of being permitted to address your Sub Committee. I have been asked to represent Craigiebuckler and Seafield Community Council in this matter.

You will have noticed, I am sure, that nobody from your Council or from the applicant’s team has identified a single problem with this application. You might find that unusual, given that the proposal is to locate a HWRC in, or at any rate right next to, a public park.

The entrance to Hazlehead Park, the jewel in Aberdeen’s crown, welcomes a visitor to the park with a large and impressive notice board. The restful vista along an
avenue of beech trees is interrupted only by the peaceful and happy sight of small children coming and going from school, runners, riders, walkers, mothers pushing prams and decorous, respectful car traffic. As will no doubt be said again and again, it is the jewel in Aberdeen’s crown. With the Piper Alpha Memorial and the Queen Mother Rose Garden at its heart, its free and open space, and as a restful spot from the hustle and bustle of Europe’s oil capital, it is truly an asset in every sense.

The approach to such places is critical to its appreciation.

We all know that waste is a problem, and that we need places where it can be recycled or dumped. Mr Lawrence is correct. There are policies to follow and directives to be fulfilled. It is unsatisfactory for a large slice of the population to have to cross town to Tullos to do that. And so an answer must be found. Mr Lawrence though has said that there are no insurmountable barriers to this application. Mr Cracknell did not mention any adverse feature.

You may have noticed that neither of them said anything about the people affected. These are the people who will have to live with the consequences of the decision.

I hope to be able to persuade you that making use of a slice of the green belt for an industrial process is not a sensible choice, and is one which has been brought about by inertia. Insufficient thought. Not by planning but by default.

I refer to the report by the Director of Housing and Environment to the Housing and Environment Committee on 13th April 2010 which stated:-

“In conclusion, none of the sites identified satisfy all of the criteria for a Recycling Centre. A process of elimination has therefore been undertaken with the Grove Nursery in Hazlehead and the former Hazlehead Caravan Park the two sites that come closest to meeting the requirements. There will be local public opposition to both of these two sites, with the former Caravan Park likely to face stronger opposition. The Nursery is not currently available for public use, unlike the Caravan Park and is not immediately adjacent to a major school. The disadvantages to the Nursery site relate more to general land use designation and the potential for other high value development of the site. This potential shows no sign of being realised and it must be noted that a Recycling Centre is a requirement for the Council and therefore has to be found somewhere; the argument about higher value use will arise with any site that has the minimum required characteristics for a Recycling Centre.

On balance, the north-west corner of the Grove Nursery site is considered to be the best available site for a new Recycling Centre serving the citizens of the west of Aberdeen.”

And nobody is to blame for this; the Director picked the sites before he did the planning, and then scored them - and this one came out one of the best two places
NOT to site a WRC. The site has been inserted in the draft Local Plan and is now the subject of numerous objections. Yet it has been picked.

This is a consultation, and we are your consultees, so I hope you will not be bored if I just address some of the issues for a moment.

My people, who have asked me to speak for them, think that if you were to choose any location in this great city not to locate a Waste Recycling Centre, then it would probably be next to/on top of Hazlehead Park. There are 1,700 households in Craigiebuckler and Seafield Community Council’s area.

If you wanted to wreck its character and ambience at a stroke, then think of the conglomeration of white van men, weekend garage and attic clear outs, amateur landscape gardeners clearing and the pre Christmas clearout of old tellies and fridges, bottles and glass, cardboard boxes, building materials and the rest; this is what happens at a WRC. You can see this happening all over Scotland any day of the week.

But enough poetic licence. Why not here? Craigiebuckler and Seafield Community Council has its finger on the button of its community, and the people - who haven’t been asked - don’t want it.

I don’t want to talk about local politics. The law is that you have to make these determinations according to the Development Plan, unless there are material considerations indicating otherwise.

The adopted Local Plan says it’s green belt. The policies in the adopted Local Plan (Policy 28) are reflected in the emerging Local Plan at Policy N2.

But the adopted Local Plan also says that you need a WRC site on the west of the city.

Your new Local Plan, not yet adopted, puts this allocation for a WRC next to an allocation for leisure and recreation; next to the playing fields; next to not one but TWO schools; near the Piper Alpha Memorial. You may think that approaching one of Aberdeen’s sacred sites past a line of cars depositing garbage and waste is not exactly appropriate.

There is no Environmental Impact Assessment - why on earth not? Mrs Farquharson-Black will deal with this. You might think that if the Environmental Impact regulations are to mean anything, then identification of significant environmental effects before consent might not be a bad idea.

It’s a place the public go - it is a public park, for goodness sake. A HUGE public park in the middle of a city. It’s not a multi purpose facility just as the mood takes you - it’s a public park.
There are things about the decision that we all don’t like; it’s the city’s land, so we have to be very careful. That means that ultimately a decision should be taken elsewhere.

The Vice Chairman of the Committee which took the decision to select this site on 13th April 2010 was sitting on the Board of SITA until August of that year; although he declared an interest, he still spoke in the debate, and voted, and proposed or seconded the motion, and voted in its favour. That’s a fact. It’s up to you, but it doesn’t feel right to me.

SEPA have objected. I can tell you that having a SEPA objection at this stage is very unusual. What are they worried about? Inadequate surface water drainage details. At a WRC you have to lay many thousands of tonnes of concrete. The water has to go somewhere. Chances are it will be polluted. Where is it going to go - downhill? Mr Cracknell has said that there will be water attenuation, and it is clear that he is working to the highest standards. But SEPA has objected, and they haven’t withdrawn their objection yet.

What will happen here is that once this site is established, complimentary business will set up alongside it; there won’t be leisure and recreation, because it will not be possible to take recreation next to the banging and thumping of a WRC. So in a year or two, oil and battery disposers, fridge disposers, specialist chemical treatment works, metal bashers and all the rest will be clamouring to set up their businesses alongside the WRC - which, if you think about it is quite logical. It has happened at Polmaise, near Fallin in Stirling. It has happened at Newtongrange in Midlothian; it has happened in the Borders, and I am sure it has happened in Glasgow. Why not here?

Now let me talk about the worst aspect of this project. The traffic. You have really got only one way in - along Hazlehead Avenue. That is a beautiful avenue of trees, lined with an ornamental stone dyke, and accessed off a roundabout on Queens Road. One is immediately struck by the contrast with the main traffic thoroughfare. On that road - just over a mere 5 metres wide - you are proposing to allow not only the public with its rubbish, but vans and trailers, rubbish bouncing out of trailers, small lorries, skip removal lorries, HGVs in and out all the time, and the rest. Councillor Yuill asked about new settlements; the traffic counts have been back-calculated from the estimated amount of rubbish which is being dumped. You may feel that is not entirely satisfactory.

If one was designing this on a blank sheet of paper, modern standards require 7.3 metres. That’s what the law requires. The road cannot be widened.

At the beginning of the road, just off the roundabout, there is an informal primary school crossing leading to a footpath heading south. How would you feel if a small child was killed by a skip lorry, rushing to deliver or collect before the tip closes? How would you feel if an impatent dumper of household rubbish knocked down a mother and baby in a pushchair while he or she was rushing to get to the tip?
Councillor Greig also was concerned about the effect on Groats Road, and on the secondary school pedestrian traffic in particular.

Let's face it - pedestrians and WRCs are not compatible, so don't do this.

But it's actually worse than this. The so called zero waste strategy aims to have sites which are convenient to the public. Your new Local Plan has allocated large areas for new settlements in the west of Aberdeen - we can see them in yellow on the map. And this site is just NOT convenient for them. Because you have to get into the site off the Queens Road/Hazlehead Avenue roundabout. So if you are coming from Cults or Bieldside, say, rather than go across to Tullos, it's actually just as far and a more difficult journey. In other words, it's less convenient than it could be. And that's before you get to Hazlehead Avenue. On a Saturday you'll be joining the other dumpers, the rugby and football parents, who already park in the road, people visiting the schools, and let's not forget these as well - those actually visiting the park itself, the kiddies' play park and the Memorial.

There hasn't been a WRC site on the west side before. There is no doubt that Aberdeen needs one. The population will flock to it; what you would be doing here is creating a monumental traffic jam. Remember too that what goes in must come out. A one way system using Groats Road won't work, since it only allows a left turn AND it goes past Hazlehead Academy, the secondary school.

So what's to be done?

Mr Cracknelli says he has consulted a lot of documents about what is appropriate for a WRC. Our suggestion to you is that you look critically at the site selection process and at the interests involved, and that you look critically at the site selection process and at the interests involved, and that you instruct your officers to carry out a proper public consultation in the context of the current Local Plan. The Reporters work for you, not the other way around; make sure that they understand that their job is to find a workable solution to this pressing problem, and that they have to be able to recommend it with confidence to the full Council when their work is done. Already you have the dilemma that there are to be no hearings - well, it's your plan, so demand a hearing and let the public be heard.

These people from Craigiebuckler and Seafield Community Council are not middle class NIMBYs afraid of change; they are people of solid conviction, who prize Hazlehead Park and Schools, the playing fields and the green lung in the centre of the city. You have all travelled a little bit and you'll see how very precious that is. And listen to the people who put you here.

Edinburgh has the Meadows, Glasgow has Bellahouston and Glasgow Green; Perth has the Inches, Stirling has the Castle and the Ochil Hills on its doorstep. None of them has waste disposal sites in the park, or even right next door, off the only access road. Aberdeen has Hazlehead Park, arguably the best of the lot of them.
Just leave it alone, look after it and cherish it, for if you don’t future generations will wonder why. All for a few old tellies, black bags and some broken glass.

I don’t want to come to Aberdeen in a year or two to see a sign on Hazlehead Avenue saying “Welcome to Hazlehead INDUSTRIAL Park”.

Following Mr Campbell QC’s presentation, the Convener wished to respond to some of the points that had been raised. The Convener emphasised that if any member of the public had any concerns regarding the decisions or actions taken by elected members then they had the right to refer those concerns to the Standards Commission to investigate. She added that the Sub Committee had no authority in regard to site selection - it could only consider a planning application on its merits.

Dr Margaret Bochel, Head of Planning and Sustainable Development - Aberdeen City Council, explained the role of the Reporter - the Council could not instruct a Reporter to take any action. An Independent Inquiry was just that - the Council had no authority on the matter.

Mr Campbell QC, supplemented by Mr William Sell of Craigiebuckler and Seafield Community Council, responded to questions from members, and the following information was noted:-

- no Community Council funds had been used to hire Mr Campbell QC; his services were being provided free of charge via the Faculty of Advocates
- Craigiebuckler and Seafield Community Council had liaised with Queens Cross/Harlaw Community Council on the proposal
- Craigiebuckler and Seafield Community Council had objected to OP67 within the proposed Local Plan - an acknowledgement to the objection had been received but no further information had been sought

Next to address the Sub Committee was Mr Henry Innes, Session Clerk at Craigiebuckler Parish Church, who made the following presentation:-

Craigiebuckler Parish Church of Scotland is the Parish Church for the area including this proposed development. I, therefore, represent a congregation of 812 of which 75% are resident within the Parish. All are members of the electorate and contribute to the local taxes of the city.

This matter was fully discussed at Kirk Session level, and I was instructed to write and express the unanimous disapproval of all our members to this development even being considered in this area of our city.

Our Minister, Rev. K Petrie, is chaplain to Hazlehead Primary School and is co-chaplain to Hazlehead Academy. Total opposition has been expressed by these educational establishments to the extent that the recent protest march organised was attended by many of the pupils and teachers, the Minister, many members of
our congregation and members of Craigiebuckler and Seafield Community Council, with whom we at Craigiebuckler Church have an excellent community relationship.

The impact of this proposed development has caused our community to unite in action to fight it all the way. Will some child have to be seriously injured before our planners see sense? The resultant traffic flow is totally unsustainable and must be seen in this light. Greatly increased volumes of lorries, cars, vans visiting the site for whatever purpose, will have an enormous impact on roads, seven days a week, roads which are already stretched to their limit.

We are also very concerned that this proposed development forms only a very small area of the total site. What assurances can we possibly take comfort from that the remaining areas of this green belt site will not be available for industrial development? None that we can take comfort from.

Many of our members are resident in very close proximity to this site. Many have expressed great anxiety about the negative consequences for the neighbourhood in relation to property values with such a development. Many have worked a lifetime and achieved their ambition to be resident in this area. This is not snobbery - this is freedom of choice. In a free society such a development must not be permitted on such a site. Worries are also being expressed about noise, vermin, smells, disturbance, road safety, congestion, drainage and on and on goes the list.

The city needs to increase its recycling rates but not on this site at the total inconvenience of our schools, our residents and the citizens and visitors to our much beloved Hazlehead Park.

Let me paint a picture of a very recent encounter. An elderly couple had parked not 100 yards from the proposed development in order to visit the Piper Alpha Memorial and pay their respects to the relative of a friend who was a victim of the disaster. They came to worship at Craigiebuckler Church and were abhorred to learn of the proposed development. “Is nothing sacred in this day and age?” was their comment. Only one small instance - but one of how many more? This is a popular area for leisure and recreation and must not be soiled.

It is our opinion that this application is fundamentally flawed. Impact studies on noise, traffic, road safety and environment have been done after the site was chosen as the preferred site - not before.

As the Kirk Session of the Parish into which this development will come under, we again express our total objection to the development being given any future on this site.

**Mrs Elaine Farquharson-Black** representing **Friends of Hazlehead** was next to address the Sub Committee and her statement was made in the following terms, with the aid of a PowerPoint presentation:-
My name is Elaine Farquharson-Black. I am a partner in Paull & Williamsons, Solicitors, and I am accredited by the Law Society as a specialist in Planning Law.

I am here representing Friends of Hazlehead. This is a group of Aberdeen residents who share a love of Hazlehead Park and who have come together to protect the Park and its surroundings and oppose the application for a waste recycling centre at Grove Nursery. SITA UK are the applicants, but it is clear that this proposal is being promoted by SITA on behalf of Aberdeen City Council. The Council own the land and have a duty to provide waste collection facilities in the city.

I wish to speak briefly on 5 main points of concern with the application:

1. Council role in the application
2. Environmental Impact Assessment Regulations
3. Consideration of other sites
4. Development Plan
5. Impacts of the Development

Council role

The Council is entitled to seek development on their land, but any proposal must be subject to the same rigours of the planning process as any other development. In fact, I would argue that there is a greater burden on the Council to be seen to be handling applications in which they have an interest fairly and transparently.

It is important that this Committee is seen to be critically examining the proposal. Not just because it proposes erection of a tip at Hazlehead Park, but because this application appears to be based on a decision taken by the Housing and Environment Committee of this Council in April 2010. A “tip” is the description that Committee gave to the proposal.

The Councillors who sit on the Housing and Environment Committee may be involved in now determining the planning application, particularly if it proceeds to Full Council. My clients need reassurance that this application is going to be assessed properly by this Committee and that this is not “a done deal”.

Environmental Impact Assessment Regulations

You will have seen the letter of objection which my firm submitted on behalf of Friends of Hazlehead. Looking firstly at the procedures which have been adopted in processing this application, we have concerns that the application is not supported by a full Environmental Impact Assessment (EIA). In my opinion this is EIA development under the 2011 EIA Regulations as it breaches the relevant threshold of Category 10, infrastructure developments, and is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
There is no Screening Opinion indicating that the Planning Authority has considered this application under the Regulations. This is a necessary part of the planning process. The applicant will doubtless argue that the transportation, ecological, noise and drainage reports are sufficient. That is incorrect. There are procedures which require to be followed under the EIA Regulations and they have not been followed here. The Planning Authority must address this issue before considering the application further.

Looking back through the minutes of the Housing and Environment Committee in October 2010, the Working Group set up to promote the development indicated that it would be working on an Environmental Impact Assessment. Where is it?

I believe that any other applicant would have been required to carry out an Environmental Impact Assessment if it was proposing a waste facility in the green belt.

Consideration of other Sites

An important part of an Environmental Impact Assessment is provision of the main alternatives studied by the applicant and an indication of the main reasons for the choice made, taking into account the environmental effects. There is nothing before you to satisfy this requirement and I am left wondering whether this is why an EIA has not been required of the applicant.

There is nothing in the application which indicates that other forms of development or other sites have been considered and rejected. It would appear that SITA have lodged the application because Housing and Environment told them to.

It is not sufficient under the planning process to rely on work done by the Council in another context. It would be akin to accepting internal discussions by a developer over what site it should promote for housing. Not only that, my clients also believe that the decision taken by the Housing and Environment Committee to pursue the Grove Nursery site was flawed for a number of reasons.

Firstly, there was very limited consultation on the proposal. There was a workshop on 5th March 2010 which was attended by 3 representatives from Kingswells Community Council, one representative from Braeside and Mannofield Community Council, one representative from Hazlehead Community Centre and 2 Council Officers.

Written representations were submitted by Airyhall & Broomhill Community Council, the Hazlehead Residents Association and Craigiebuckler and Seafield Residents Association, but where do we find consultation with the general Aberdeen public who are apparently to use the facility?

Secondly, the report to the Housing and Environment Committee in April 2010 advised that the consultation concluded that:-
1. Lang Stracht was the preferred area for the facility.
2. There was support for a site at Kingswells if land west of the current settlement was zoned for development.
3. There was strong opposition to siting the facility in the Hazlehead area.

The report indicated that the limited response meant that extrapolation to the wider community was difficult. I agree, but the Committee appear to have ignored the responses completely.

As I indicated, preference was for a site at Lang Stracht. A site at Greenferns, also owned by the Council, was apparently rejected because it was claimed that it would be over 5 years before the land was brought forward for development. That is not what the Local Development Plan says. 1,500 houses are proposed at Greenferns and 750 of those are to be built before 2016 so this is a site which should have been considered further.

And if this is a site to meet needs in the west, what regard has been had to the large scale developments being released under the emerging Local Development Plan (LDP) at Milltimber, Countesswells, Kingswells, Craibstone and Maidencraig?

The LDP requires all these developments to provide recycling facilities. The AWPR will provide good links around the west side of the city between these sites. Surely these facilities will also be available to existing residents in these areas? How has that been factored in to this application?

Development Plan

The supporting statement relies heavily on the proposed identification of the site for a recycling centre in the emerging LDP. You cannot put any weight on that zoning as it is subject to considerable objection and is part of the examination of the Plan currently being undertaken by Scottish Government Reporters.

You require to consider this application against the current Green Belt and Green Space Network Policies 28 and 29 in the adopted Development Plan which contain a presumption against this development.

It is relevant to note that the site was considered as a development site in the Green Belt Review carried out to support the 2008 Plan and was rejected. It forms Area B Hazlehead on this plan.

Hazlehead Park was identified in the Review as the primary recreation area for Aberdeen and was considered suitable for Country Park Status. The Review found that development that is damaging to the sporting and recreational integrity of this area should be avoided.

The Review also concluded that access to the site for any development “via Hazlehead Avenue is unlikely to be acceptable for amenity reasons” and that the
impact of development could be high due to its potential effects on trees and the narrow roads running through Hazlehead.

It also said of the site that “Its maintenance as Green Belt will safeguard it from being developed for uses unsuitable” for its sporting and recreation purposes.

The identification of the site for a possible sports/recreation facility was seen as underlining Hazlehead as a primary recreational destination.

The site was not reassessed as part of the emerging LDP as it falls outwith any of the proposed development areas. This is the Countesswells area to the west of the site.

The applicant has failed to put forward any justification for siting the facility in the green belt such that you can set aside the policy presumption against the development. Doubtless the applicants will argue that the site itself is not used for recreational purposes, but it sits within the general park area - the site uses the access road to the park.

Impacts of the Development

Setting aside the breach of the green belt policy, this application requires to be measured against Policy 19 of the adopted Plan which prescribes the matters to be considered when determining applications for waste management facilities. These include:

- Need
- Location
- Effect on local amenity
- Nature conservation
- Landscape
- Visual impact
- Water and air quality
- Access and the highway system

It is my clients’ view that this application either fails to address these issues properly or will have a detrimental impact such that the terms of the Policy are breached. I wish to highlight the main areas of concern for my clients.

Need

The applicants argue that there is a need for a facility to the west of the city, yet there are no figures to support that need. It is submitted that this application fails to consider alternative options for managing waste, such as kerb side recycling (all households require to have kerbside recycling by 2015) or to consider whether the need, if it exists, is better addressed through a different location or locations. These are issues which form part of the current consultation on the Main Issues Report for the new Structure Plan and as such this proposal is premature.
**Roads**

It is submitted that the applicants have underestimated the impact which the additional traffic going to and from the site will have on the existing network and have ignored or downplayed road safety concerns. Since submission of my clients’ letter of objection, WA Fairhurst and Partners have critically assessed the Transport Statement for my clients and found it to be lacking. Principal areas of concern are:

- The access to the site is not up to standard. As the Council noted back in 2008, Hazlehead Avenue is not suitable for a lot of additional cars. Hazlehead Avenue is only 5.2 metres wide at some points. The development will require to be accessed by large multi-axle lorries transporting skips. The standard width for a road which will generate HGV movements such as these is 7.3 metres.
- The trip generation for the site is likely to have been underestimated as it has been based on the Westhill facility in Aberdeenshire not the existing city facility at Tullos. It is submitted that the traffic figures will be more influenced by the population served rather than the tonnage capacity of the site which is the approach adopted by the applicants.
- Whilst the theoretical capacity of the road could accommodate the existing and development traffic, this is not a measure of the traffic impact or the suitability of the road to accommodate the traffic. Traffic flows are predicted to increase by 150% in peak periods and 92% daily.
- The assessment appears to have been carried out in the 1500-1600 peak and ignores the peak period for commuter traffic on Queens Road which runs until 1800. Standard TA methodology requires the peak period traffic for this junction plus the development traffic to be analysed in all directions not just on a single approach as done by the applicant.
- Parked vehicles outside the primary school and playing fields reduce the road to a single lane operation during the measured PM peak. This means vehicles will be forced onto the opposite side of the road where forward visibility to oncoming traffic is restricted. This should be raised as a road safety issue by the Council officers.
- The methodology used to assess the number of crossings of the road (pedestrians per minute averaged over an hour) downplays the real numbers as the crossing is concentrated over a period shorter than an hour.
- Doubling the traffic statistically doubles the accident potential.

**Ecology**

My clients do not believe that the applicants have demonstrated that there will be no impact on the wildlife in the area. The survey carried out itself acknowledges that a limited walkover was done in March which cannot be considered to be conclusive. It does not appear that the survey considered the potential for a detrimental impact on the District Wildlife Sites at Walker Dam and Johnston Gardens due to pollution of the watercourses.
Drainage
My clients have grave concerns about the drainage arrangements for the site. I understand that SEPA, as the statutory authority with responsibility for discharges to watercourses, have objected to the application due to the failure to provide a suitable Drainage Impact Assessment.

Noise
The Noise Assessment submitted with the application claims that there will be no impact on the surrounding residential areas. I shall leave neighbouring residents to address you on this claim. My clients are concerned with the impact of the development on the enjoyment of the park, and in particular the solemnity of the Piper Alpha Memorial.

The noise measurements carried out by the applicants indicate that the existing noise levels by the site are around 40 decibels. The World Health Organisation recommends that noise levels in outside recreation areas, such as gardens, should be no more than 50 to 55 decibels.

The noise from the various activities to be carried out on site, such as car doors slamming, glass bottles being dropped into skips, the skips being collected and loaded onto lorries, is forecast to be up to 79 decibels. An increase of 10 decibels is equivalent to doubling the volume of the noise. A 40 decibel increase is equivalent to 16 times the current noise levels at the park. It is way over the World Health Organisation guidelines for recreational space.

Enjoyment of the park against those noise levels will be greatly diminished such that people will be dissuaded from using the area.

Conclusion
I have highlighted the main concerns which my clients have with the proposals before you. These are valid issues which require close scrutiny by the Planning Authority in the discharge of its functions. As it stands, this application requires a proper Environmental Impact Assessment; it contravenes the adopted policies of this Council and there are no material considerations which would justify setting aside those policies and erecting a waste facility, or tip, in the city’s premier park.

Mrs Anita Martin representing Hazlehead Primary School Parents’ Council was next to address the Sub Committee.

Mrs Martin explained that Hazlehead Primary School was a new school and that the Parents’ Council felt that the pupils were getting the best education in the city despite cuts to the education budget, and that as part of the curriculum, the Council should be utilising the fantastic local environment the city had at its disposal.

Mrs Martin highlighted five main concerns as follows:-
1) **Safety**

Children are not recyclable. Hazlehead Avenue is congested at peak times, when the road effectively becomes a single lane. There will be a significant safety risk if the proposal is approved. It is unfortunate that the site visit attended by elected members did not coincide with the school drop off - children can be very unpredictable, particularly around traffic.

2) **Hazlehead Park**

Hazlehead Park is a fantastic park, with a wonderful children’s play area. The park is a hub of activity all year round and if a recycling centre is to open next to it, it will discourage people from using the park. Hazlehead Park is one of the biggest tourist attractions in Aberdeen.

3) **Green Belt**

Green belt should be kept green - other more suitable proposals should be considered for the site. The children have suggested, amongst other things, a skate park, an area for dogs and a safe cycle area.

4) **Noise**

There is considerable concern about the noise associated with HGVs, the constant flow of traffic and industrial noise coming from the facility itself potentially disrupting classrooms.

5) **Site**

Why this location? The Kingswells Park and Ride site appears to be more appropriate. The Parents’ Council is not against recycling, however the Grove Nursery site is not appropriate for the reasons outlined above.

Mrs Martin went on to summarise the actions that the Hazlehead Primary School Parents’ Council had taken to date, which included:

- attending all relevant meetings
- keeping parents abreast of developments
- organising a protest walk which had been very successful and well attended
- organising two petitions

Mrs Martin concluded that the safety of children and their educational welfare were the main concerns, and that the Hazlehead Primary School Parents’ Council did not want to see either detrimentally affected.
**Mr William Bayliss, a local resident,** was next to speak by way of a PowerPoint presentation. During his presentation Mr Bayliss explained -

That he was in attendance today:-
- to object to the application
- to discuss the serious failings in the application process
- as a member of the public to question the ethics and integrity of the selection process and some of the Council officers
- to understand why the Council have gone against policy items that contravene the Aberdeen Local Development Plan
- to present both technical and legal arguments that clearly show supporting documentation to the SITA application cannot be relied upon
- to show the emotional disregard by the Council for public rights to retain recreational peaceful areas including the Piper Alpha memorial

He explained that in his view the application process is viewed by the public in the following way:-
- it’s a done deal
- voting is all political rather than objective of what is right for the local community
- Council wants to turn recreational land into industrial land in order to make short term financial gains
- by not making the selection process of Hazlehead Nursery area public, it creates suspicion of “underhand deals”. Perception is that the Council will not investigate as it may find too many “skeletons in the cupboard”
- intentions are to turn whole site into industrial land. So what is next or will the Council object to further expansions?
- SITA is being paid to submit the application before approvals of change of use of land. Why? Are they being reimbursed?
- SITA and the Council are “in bed” with each other
- the Council “get away” with contravening its own policies

He then asked the question why was an application on a planning process commended on non-industrial land. And put forward the following views:-
- reference was made to the decision of the Housing and Environment Committee on 13 April 2010
- utter disregard of consultation process. Minutes state preferred sites as Land Stracht/ Whitemyres industrial site. Strong opposition by Hazlehead, Seafield and Craigiebuckler residents
- selection process of Hazlehead site not made public. Neither was demonstration of “best practicable environmental option” (see Policy R3)
- by Councillor Kevin Stewart declaring an interest in SITA, receiving “entertainment” and being the Councillor who seconded the motion for Hazlehead, under any public process this cannot be supportable or just
- simply there is sufficient doubt in the selection and the process used for a formal investigation by the Council
He then posed the question “So why the change of intent?” and quoted from Policy NE3 - Urban Green Space which stated that it is Aberdeen City Council’s policy that “permission” will not be granted to use or redevelop any parks, playing fields, sports pitches, allotments or all other areas of urban green space (including small spaces not identified on the proposals map) for any use other than recreation sport”. He further explained that this was further supported by Policy NE1 - Green Space Network in that the aim of green space is to maintain the identity of Aberdeen and communities within it. He went on to say that the Council will protect, promote and enhance wildlife, recreational, landscape of the green space network. Proposals for development that are likely to destroy or erode the character or function of the green space network will not be permitted. He put forward the view that this change of intent contravenes the Scottish Planning Policy as referred in Policy NE8 - Natural Heritage. He explained that item 3.82 on the same page as Policy NE8 states “access to the outdoors for informal recreation contributes to everyday life. Increased levels of physical activity outdoors can contribute to improved health and wellbeing, while access to high quality areas for outdoor recreation can help the city attract and retain people”. He asked further questions relating to these policies such as whether the site was one of a green park heritage or a waste dump, whether these were policies or statements of convenience, whether children/families would enjoy peace and recreational facilities or would be faced with a dump, whether this proposal would enhance wildlife or attract vermin, and expressed the view that the Council should keep the park as is for recreational purposes and for quality of life.

He then went on to ask the question “Am I competent to assess impact assessments?” and put forward the following views:-

- legal waivers in impact assessments are clear and remove responsibility for any other party than SITA and gave an example as follows:-
- the notice states “this document and contents have been prepared and are intended solely for SITA’s information and use in relation to the proposed household waste and recycling centre. Atkins Acoustics Noise and Vibration assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents
- have SITA’s Terms of Reference and specific instructions been checked? Will Aberdeen City Council be producing its own report?
- how does the Council intend to protect the public legally with such waivers in place?

He then expressed the view that the impact assessments were full of technical flaws and gave the following examples:-

**Noise Impact Assessment**

- only considers trucks/ noise at operational site
- does not consider trucks with containers passing over sleeping policemen - creating noise levels in excess of 70 decibels
residents of Queens Grove, 20 metres from noise source - not 200 metres as outlined in assessment
no practical tests performed by driving trucks over sleeping policemen and check of noise levels in residential spaces

Ecological Impact Assessment
will Council validate and confirm that application complies in full with the Wildlife and Countryside Act 1981 and the Conservation of Natural Habitat Regulations 1994?
no mention of increases in vermin and if they can damage other populations, e.g. red squirrels

Transport Statement
Council advised that “dump” traffic will not commence until 10.00am. If this is on grounds of safety, what studies have been conducted at lunch/home time for school?
has the Health and Safety Executive been consulted on compliance with its website on transport movements in reducing risks to as low as reasonably practicable?
pelican crossing will make traffic stop - has “backing up” been assessed?
what impact have parked cars during the school run?
no mention of the fact that it is unlikely that two large trucks can pass in opposite directions.

He then made reference to the Piper Alpha memorial in Hazlehead Park and expressed the view that placing a “dump” next to a memorial in a community that “lives and breathes” the oil and gas industry is shameful and that the families affected by the tragedy would be deeply hurt and asked how the Council were going to deal with the publicity that an oil and gas operator (Gaz de France, SITA’s owner) is building a dump next to the Piper Alpha memorial?

Mr Bayliss concluded by asking the Council to have a clear conscience and to do the “right thing” with this application and to save the City’s natural heritage, not only for today but for the children of the future.

Following Mr Bayliss’ presentation, the Convener wished to respond to some of the points raised. The Convener explained that it was not within the power of the Sub Committee to make a decision on the application today and further explained that a report would be submitted to a future meeting of the Sub Committee and in terms of legislation councillors need to see all the information regarding a planning application prior to making their decision.

She further explained that councillors have many different roles to play in the Council and they have to separate these responsibilities. As an example, she explained that some councillors who may have approved the Housing and Environment Committee report as to the preferred site for the recycling site may well then decline the planning application when it is considered due to the different
and distinct roles that councillors have to take in such situations. She said that if any member of the public had any concerns regarding the decisions or actions taken by councillors then they of course could refer the issues to the Standards Commission to investigate.

She then strongly expressed her view that Mr Bayliss had impugned the officers dealing with the planning application and explained that all of these officers were professionals and had professional ethics. She explained that officers will assess all the details and will then put forward their honest and unbiased recommendations for the Sub Committee to consider.

Mr David Wolfe, a local resident, made the following presentation:

Good afternoon convener and members of the committee. Thank you for this opportunity to address you this afternoon. The opportunity is particularly welcome as my letter of objection is not one of the small selection of letters of objection which made it into the Public Document Pack provided today. I would encourage members of the committee to read all 250 letters of objection.

Before I commence my address I would just like to respond to the observations of Councillor Cormie mentioned earlier that there were already large trucks operating at Grove Nursery. I observed this morning activity which may have been associated with unblocking the drainage (a problem mentioned by others) and which involved a number of HGVs. I can assure you that this is unusual and the normal state of affairs at Grove Nursery is very quiet.

Many of my points of objection have been adequately covered by other objectors today, and I shall endeavour to limit my address to those additional points I have.

Traffic Study
This is not independent - it was prepared “in support” of the application by a contractor to the applicant. As such it does not set out to assess the impacts in an unbiased way and the citizens of Aberdeen and members of the committee cannot rely on this work as being fair and balanced to all interests.

Council officers directed Atkins on key assumptions to be used and the same Council officers will review the report and make recommendations. The memo of the roads engineer Mr Inkson is a simple repetition of points from the report without adding any objective analysis. Mr Neil of the Roads Department said this morning that the report had been audited in the department, but I saw and heard no evidence that the various points of objectors concerning safety, inadequate road width, damage to trees, traffic volumes etc. has been subject to impartial and objective assessment. This needs to take place.

Concerning the road width, Mr Neil stated this morning that it is 6.6m wide. I have been on Hazlehead Avenue with a tape measure and can state with authority that
the road is of variable width and although it may be 6.6m wide in places, it is only 5.65m wide towards the Hazlehead roundabout. That is insufficient for trucks to pass.

A key assumption in the report was that “many trips will already be on the road as users divert from existing trips”. This appears to either undermine the assumption that the site will promote greater recycling, or undermines the assumptions on traffic volumes.

No consideration of there being an incompatibility arising through peak recycling times occurring coincident with peak use of the park during summer weekends, especially during events such as highland games etc. And as we heard earlier today, no account has been taken of growth in traffic that will be generated from the various planning proposals for office, industrial and retail developments along the axis from Queens Road and in the vicinity.

The traffic and noise studies have not taken into account the noise generated from skip trucks, in particular empty trucks, crossing the speed bumps on Hazlehead Avenue which will occur in close proximity to housing. The point is recognised in both the noise study and the traffic study but then not analysed.

Size of Facility
Area of the site is several times greater than at Tullos, yet it is claimed that the capacity will be the same. Either the site is too large or there is an undeclared intent to expand the capacity within the same footprint as to avert the need for further planning application. This cannot be allowed to happen.

Precedent
The report from Dr Bochel provided in today’s Public Document Pack for this hearing cites extracts from the Scottish Government’s Planning Advice Note 63 (PAN63). These extracts are drawn narrowly and selectively and focus only on points which support the need for waste recycling centres. The report makes further reference to paragraphs 166 - 173 in this PAN. There are no such paragraphs in PAN63. I am concerned that this report is taking an unbalanced and biased approach to the analysis of national planning policy in relation to Grove Nursery and also that it contains errors.

I expect that it is very infrequently that members of the Planning Sub-Committee have to deal with an application for waste facilities, and this may be unique in the experience of many members of the committee. It is incumbent upon you to ensure that you are familiar with all relevant aspects of planning policy in reaching a decision on this application. The current report from Dr Bochel does not provide an adequate basis for your decision.

PAN63 is complementary to the Scottish Government’s Scottish Planning Policy (SPP) and the correct approach is to look in a balanced way at the full set of guidelines in this document and supplement with advice from PAN63. There are a number of points in SPP which I would draw to this hearing’s attention:
Paragraph 163: Development in the Green Belt to be permitted only if other sites are not available. There are available alternatives and I shall come back to that point in a moment.

Paragraph 216: Modern waste management is similar to industrial processes.

And in PAN63 I draw to your attention the following paragraphs:

Paragraph 22: Siting of larger facilities at industrial sites and siting adjacent to major road junctions.
Paragraph 74: Utilise major road and motorway network rather than local roads for bulk transport.
Paragraph 75: Sites should have direct access from roads of an adequate standard. Co-location can be considered - such as with a Park and Ride site I suggest
Paragraph 87: Hours of use to be considered so as not to impact the amenity of the area. In this respect I draw to your attention again the conflicts over weekend access and park events.

This list is, I am sure, not exhaustive and I urge all committee members to ensure they are familiar with all applicable content of SPP and PAN63 before considering the merits of this application within the framework that these documents set out.

Alternatives
I return to the subject of alternatives. The process which selected Grove Nursery was flawed and did not adequately consider alternatives. In particular there has been a persistent unwillingness to properly consider the Kingswells Park and Ride site. The report H&E/10/009 dismissed the site on grounds that there was not access when coming from Aberdeen - totally wrong. And that there were legal restrictions due to the compulsory purchase used in acquiring the site. This latter point is not supported by the legal opinion given to the Enterprise, Infrastructure and Planning Committee and recorded in their minutes of meeting of 7th March 2011, page 334 (and which was given in respect of its consideration of alternative and complementary uses of the Kingswells Park and Ride site):

The legal advice given is that the use of a Compulsory Purchase Order (CPO) to acquire the land for the Kingswells car park means that there could not be full and unrestricted use of the site for alternative uses. Any uses would have to have some connection to a local authority function, which may include for example, community uses. Any complementary use that involves commercial or profit making organisations charging to provide a service would not be considered competent given the legal restrictions on the uses which can be made of land acquired under a CPO.

A household waste recycling centre would, in my opinion, fall within the remit of being in connection to a local authority function and there will be no charge to users. Hence, it is now established that the Kingswells P&R site is available and
grounds for its dismissal were incorrect. And there are other alternatives too such as the new commercial and industrial zone to the west of the Kingswells P&R.

**Precedent**
The committee should consider the question of whether it would approve use of the site by a commercial/industrial concern, not connected to the council, which involved the haulage of 8000 tonnes per annum of material on and then off the site in heavy trucks. I would not expect such a proposal to be entertained. If such use is inappropriate for one, then it is inappropriate for all. The council should not alter or lower its standards in the determining the planning application just because it is involved.

And finally, in addition to these technical and legal arguments, does it feel the right thing to do? Certainly not to me. This proposal lacks strategic vision and destroys sense of pride in our community. To proceed would be an act of officially sanctioned vandalism. There are better options available (Kingswells P&R being one); grasp those opportunities and reject the Grove Nursery site.

**Mr Tugwell, a local resident** spoke to a rolling programme of PowerPoint slides wherein he explained that siting the proposed recycling centre at the Grove Nursery was wholly inappropriate; he explained that Aberdeen City Council had just adopted its new Nature Conservation Strategy for the city of Aberdeen which aimed to “conserve Aberdeen City’s natural heritage for the benefit of our bio-diversity, citizens and visitors, for current and future generations”. Contained therein he explained four of the objectives as follows:-

- Protect, preserve and enhance Aberdeen’s natural heritage
- Sustainably manage Aberdeen’s natural heritage
- Involve communities in caring for Aberdeen’s natural heritage
- Promote a greater understanding, appreciation and enjoyment of Aberdeen’s natural heritage

He then went on to speak about the decision of the Housing and Environment Committee of 13 April, 2010, specifically the report entitled “Location of West of City Recycling Centre”. He expressed his view that some of the photographs in the report were misleading as other examples of recycling centres photographed in the report were in fact in industrial areas elsewhere in the UK and he put forward the view that Hazlehead is not an industrial zone. He then quoted from the report the following “that the area of the Lang Stracht is regarded as the preferred area within the west of the city, with the Whitemyres industrial estate seen as the best location of all” and questioned why did this not happen. He further quoted from the report “not withstanding any proposed mitigation measures, it is likely that there will be strong public opposition to the Hazlehead Caravan Park site which may adversely affect the abilities to secure planning permission” and he questioned why there would be any difference with the Grove Nursery site. He further quoted from the report “in conclusion, none of the sites identified satisfy all of the criteria for a
recycling centre” and he questioned in which case why doesn't the Council look elsewhere?

He referred to the summary sheet contained in the report which outlined the various sites for consideration and scored them accordingly. He questioned that there surely was a distinction between industrial sites (Whitemyres) and recreational sites (Hazlehead).

He referred to the consultation workshop held on 5 March, 2010 where he said there was a notable imbalance of representation from potentially affected community councils. He explained that 3 representatives from Kingswells Community Council and one from Braehead and Mannofield Community Council were in attendance with no other community councils being part of what was surely a critical consultation. He quoted from the consultation meeting “due to potential noise and increase in traffic - there is likely to be a great deal of resistance from Kingswells residents” and he suggested that this may well equally apply to Hazlehead residents.

He referred to the site at Whitemyres and quoted from the report that went to the Housing and Environment Committee with regard to this site “excellent location due to road network and location” and “current tenants of Council owned lots are not interested in ending the tenancies”. He expressed the view that this predicament did not stop Aberdeen City Council giving Whitespace occupants 60 days notice to quit when they wanted their site for their own particular purposes.

He referred to a response put in by Ashley and Broomhill Community Council regarding the scoring of the potential sites which included the Community Council’s view that the Grove Nursery was the least appropriate site and which also identified environmental issues as of prime importance.

He further quoted from the report which went to the Housing and Environment Committee in relation to the Hazledene Road site “the main drawback is the main access route from the east (Queens Road) is along a residential road and this alone makes this site unsuitable for heavy goods traffic. In addition, the times of greatest use for the recycling centre (weekends) coincide with times when families/residents would be at home. Development of the site is not considered desirable or deliverable”. He suggested that this comment should indeed apply when it came to the Grove Nursery site too. Further quotes from the report in relation to general comments for the Grove Nursery site read “Asset Policy considers this land to have high value development potential and are not in favour of introducing this land use into the site. Planning colleagues are also reluctant to consider change of use”. He suggested that therefore officers should have drawn the common conclusion that development of the site was not considered desirable or deliverable.

He further quoted from the report to the Housing and Environment Committee that the Greenburn site “could be operational within 3 years and would be an excellent location for an additional site in the future”. He explained that 18 months had now
progressed so why couldn’t the Council “rewind” and let the proposal satisfy prudent financial, environmental and electorate scrutiny?

A number of the slides contained opinions (based on questions/statements put to them) from various organisations including Beautiful Scotland, a squirrel control officer and various residents of the city and visitors to the city.

He then explained that Hazlehead is such a wonderful amenity for diverse groups of people including runners; children; equestriennes; cyclists; walkers; footballers etc.

He then referred to the meeting of the Housing and Environment Committee of 13 April, 2010 and to the minute of the meeting wherein Councillor Kevin Stewart had declared an interest in the article by virtue of his membership of the NEM SITA Management Board. The minuted article explained that Councillor Stewart did not consider it necessary to withdraw from the meeting prior to the consideration of the “Location of West of City Recycling Centre” report.

He further quoted from the minutes “(1) that the area of the Lang Stracht was regarded as the preferred area within the west of the city with the Whitemyres Industrial Estate seen as the best location” and outlined the recommendations of the report and the motion and amendment put forward at the meeting (which included the motion being seconded by Councillor Kevin Stewart). He further explained that the motion to approve the recommendations was accepted by a 10 to 5 majority.

He further suggested that the amendment put forward was a more sensible option but that this had been defeated in the vote.

He further asked the councillors that there comes a time when they simply have to listen and respect the opinion of the electorate.

He then quoted the following from the Council’s own website “Hazlehead Park - a park of over 180 hectares which was originally part of the freedom lands granted to the city in 1319. The land fell into private ownership but was bought back by the Council in 1920. This park is on the outskirts of Aberdeen and is heavily wooded. It is popular with sports enthusiasts, walkers, naturalists and picnickers. Around the park are football pitches, a golf course, pitch and putt course and woods for walking. The park itself has rose gardens, azalea and rhododendron borders, heather beds, a children's play area and a pets’ corner. The park has a significant collection of sculpture by a range of artists and heritage items which have been rescued from various places within the city.” He suggested that the proposal to site the recycling site did not suggest responsible custodianship. He again quoted from the Council website that Hazlehead Park was originally part of the freedom lands granted to the city in 1319 by Robert the Bruce and asked why couldn’t the Council continue to give people freedom for the next 700 years.
He concluded by saying that he was not against recycling, in fact he was absolutely for it but there simply must be a more appropriate site than Grove Nursery, Hazlehead.

There then followed questions to Mr Tugwell. One member of the Sub Committee enquired whether Mr Tugwell during his presentation had referred to Councillor Kevin Stewart as an officer of SITA.

The Convener explained that Councillor Stewart was a Non-Executive Director of SITA. The Convener again re-iterated that if any member of the public had any concern regarding actions or decisions made by elected members then they should report this to the Standards Commission.

Following a question by an elected member, Mr Tugwell agreed that a recycling centre was required but not at Grove Nursery site. Mr Tugwell was reminded that the selection of the site was not within the remit of the Development Management Sub Committee.

Mr Tugwell was asked what the detail of the question put to the organisations and citizens was. He explained it was simply a petition to object against the proposals which also had a space for comments.

Mr Robert Frost, a local resident, was next to speak by way of a PowerPoint presentation. During his presentation Mr Frost explained:-

- there is majority support for a recycling centre
- but Grove Nursery site is completely the wrong location
- the Council made a very poor decision on 13 April, 2010
- the Council failed to properly consider all the implications surrounding the site
- why was Grove Nursery site chosen? This was decided by the Housing and Environment Committee in April 2010
- this was a flawed decision
- the subjective scoring of the potential site was wrong
- there was no mention of Hazlehead Primary School
- he was so outraged at contents of the report he arranged meetings with Councillor Corall and also Council officers Peter Lawrence and Andrew Smith

He then talked about an email he had received via a Freedom of Information request which quoted “the west of the city thing is beginning to get “political” with local residents already kicking up a bit of a fuss about the Hazlehead site”.

He then referred to comments from a citizen who was taking visitors to Hazlehead Park in July, 2011, the citizen and visitors’ comments included
Mr Frost then asked the question, is it a good idea to change Grove Nursery into an industrial site with an 8,000 tonne recycling plant or are we staring into the abyss?

He then outlined the following reasons why he thought Grove Nursery was not a suitable site:

- impact on amenity
- departure from Development Plan
- crazy siting it next to a primary and large secondary school
- impact on access, parking and road safety
- no allowance for events held at Hazlehead Park, athletic events, charity walks/runs, Highland Games, dog shows, flower shows and corporate events
- turning Grove Nursery into a light industrial site is not compatible with the leisure and recreation use of Hazlehead Park and the surrounding area is enjoyed by thousands of citizens across North East Scotland
- that if this land is to be used it should be reserved for leisure and recreation use or sporting facility

He then explained that in his opinion some letters of objection were missing and that there had been problems in processing letters and that a number of letters were received but not officially registered as part of the planning process.

He then asked if siting the recycling plant so close to the Piper Alpha memorial was showing respect to those who had died.

In conclusion he said:

- please vote against this planning application for an 8,000 tonne recycling plant
- Councillors have a responsibility to preserve the area to be enjoyed not only by the citizens of Aberdeen but for everybody who currently enjoys Hazlehead Park from the north east of Scotland
- preserve the area for enjoyment of future generations
- children are the future of our city

Mr William Sell, a local resident, made the following presentation:

Road Safety
No account has been taken of the fact that Hazlehead Academy pupils go out at lunch time and use the park. A large number of pupils do this, especially in fine weather.

Hazlehead Avenue is not wide enough for two heavy goods vehicles to pass each other on approach. I measured it at a point where it is only 6 metres wide. Earlier, we heard it said that a part of the road was only 5.2 metres wide. The Roads Engineer said it was 6.7 metres wide. That measurement cannot be applied to the entire length of the road. It is a wrong assumption because the road may well have been the same width when it was laid out about 90 years ago, but its profile will have altered over the years so that it has pinch points in certain areas where heavy vehicles will have difficulty passing cars on approach.

To illustrate the unsuitability of this road for increased traffic volumes, I want you to imagine that you wanted to store two vehicles, side by side, in a double garage which was 6.7 metres in width, if one of the vehicles was the same width as a heavy skip lorry and the other a car. You would have difficulty parking them both in the garage or you may not get them in at all. That same problem applies to the situation whereby a lorry or a bus are being driven towards each other on Hazlehead Avenue. The road is unsuitable for the increased numbers of HGVs that will use it.

The traffic impact survey understates the numbers of vehicles that will use Groats Road. We are told that only 10% of the traffic will use Groats Road and 90% will use Hazlehead Avenue when leaving the site. In my opinion, the percentage of traffic from the site leaving via Groats Road will be much higher because vehicle movements at its junction with Queens Road are controlled by traffic lights in contrast to the difficulties faced by drivers who wish to leave the park via Hazlehead Avenue’s roundabout junction with Queens Road. At this junction vehicles trying to enter the roundabout are delayed by traffic approaching from the right, sometimes for a long time during busy periods. In conclusion, it is less hazardous and possibly more convenient to exit via Groats Road. That may well become the preferred route for a larger number of vehicles than estimated thus posing a greater hazard to the pupils of Hazlehead Academy.

Mr Richard Shepherd, a local resident spoke to his letter of representation:--

With regard to the Planning Application with reference detailed above I hereby lodge my objections to the proposed development. My objections are on several grounds as follows:--

**PLANNING**

(1) The site at Grove Nursery is designated Greenbelt - OP69 in the current adopted Local Plan (2008). As such the site is designated for a
“sports/tennis centre and/or recreation and countryside uses appropriate to the rural character of the area”.

(2) The proposed recycling centre is an industrial process and as such is entirely inappropriate and contradictory to the current Local Plan designation.

(3) The Council have a statutory duty under the Town and Country Planning (Scotland) Act 1997 to make determinations in accordance with the development plan unless material considerations indicate otherwise. No such material considerations exist in relation to this site.

(4) It is the 2008 adopted Local Plan that is the current “development plan” and as such the Council must follow its terms. The current application is a major departure from the Local Plan and there is no justification whatsoever for a move away from the Council’s obligations to protect the city’s green and open spaces - Hazlehead Park being not just a but the prime example in Aberdeen City.

(5) The developer is keen to allude to the new Local Plan and its designations. This plan is still under review and cannot be described as a finalised and adopted planning framework. To suggest so is misleading. The land here is protected greenbelt. There are other sites that are far more suitable for such a use - Kingswells Park and Ride being an example.

(6) The proposed development flies in the face of current Council planning policies on development. Greenbelt designation should not be treated by the Council with such disdain. Such a designation is to ensure that development is directed to the most appropriate locations and to protect and enhance the quality, character, landscape setting and identity of towns and cities. The developer suggests that the proposed development would not compromise any of the purposes of greenbelt designation - what utter nonsense - it compromises all of them in a material way.

(7) Policy 28 of the Local Plan clearly states that no development will be permitted in the greenbelt other than those essential for agriculture, forestry, recreation, mineral extraction restoration or land renewal - the proposed development falls into none of these categories.

At this point any debate on the merits of this application should end. The land is greenbelt designated in the Local Plan. The tax payers of Aberdeen are entitled to have this protected by its elected Councillors - that should be the decision made. The Council MUST refuse the application.

(8) Council Policy 29 applies to “Green Space Network”. This policy provides that the Council protect and enhance the values of the Green Space Network and proposals which destroy or erode the character and function of the green space network will not be permitted. An industrial use within a beautiful tranquil clean and unpolluted setting will mean both destruction and erosion.

(9) In conclusion the application contravenes the development plan, ignores the Council’s Policies on greenbelt development, green space network and urban green space. The Council have no choice but to refuse this application.
THE APPLICATION

(1) The application is supported by a number of Reports and Assessments prepared by Atkins. SITA go out of their way to suggest that these are “independent” reports. They are not. These are expensive reports commissioned by and paid for by the developer who has a huge amount to gain potentially from their content.

(2) What comfort do Aberdeen taxpayers have that these reports are genuine, accurate and comprehensive? What reports are the Council commissioning to verify the claims in these reports?

(3) I have serious reservations and grave concerns over some of the statistics and information in these reports:-

NOISE IMPACT ASSESSMENT

(1) The information provided would appear to be based on very nebulous figures, guesses and wild approximations and assumptions.

(2) As a resident in Queens Grove I am very concerned at the huge increase in HGV traffic on Hazlehead Avenue. This road is not used at all by such vehicles at present.

(3) At no point in the Atkins Assessment is there any detail of decibel increase as a result of 2 of these HGVs accelerating over a single speed bump in converging directions only 10 metres from the houses in Queens Grove. This will happen.

(4) If the proposed pelican crossing goes ahead then these HGVs will be held up at Queens Grove again creating a stop start engine noise situation. The noise and vibration caused will be significant for residents in Queens Grove - not “negligible” as Atkins would have us believe. Have Atkins tested the decibel level of such a scenario with 2 actual HGVs….there is no evidence in their report of this….why? Are the Council to do such a test?

(5) The increase in traffic volume is downplayed by Atkins and SITA. The increase is 92% - that is an enormous increase.

(6) Where are the visualisations of the HGVs that will service the site? Atkins seem keen on glossy colour depictions of landscaping, tree belts etc i.e. all the matters that support their paying clients case. Why not a visualisation of these vehicles - SITA must know the type of vehicle involved. The terms HGV and LGV are very generic and vague.

ROAD SAFETY

(1) The site is close to 2 schools - Hazlehead Primary and Hazlehead Academy. The HGVs servicing the site will go along Hazlehead Avenue - the road used by parents on the school run for the Primary School. Can there possibly be a less suitable location for such a development? Had the Primary School not been there and the HWRC been in existence would the Council dream of locating a Primary School next door to such an industrial process on a road
used by a procession of HGVs and high volume of traffic all day? I think not... The safety of children attending school is a paramount reason for rejecting this ill-considered application. Young lives will be put at risk.

(2) Despite Atkins report – the road is not wide enough for 2 HGVs to pass each other safely. The road is entirely unsuitable for this - particularly where the road bends just after the entrance to Queens Grove. SITA claim that the existence of the no. 8 bus service (discontinued in 2008) proves that the road is suitable... it does not. The frequency of that bus service meant that on no occasion did one bus meet another on that road... this will happen with the HGVs.

(3) No detailed information is provided on the number of HGVs per day that will be needed to shift the high volume of waste the developer boasts will be deposited at the centre.

(4) We are to believe that the centre will not open until 10am Monday - Friday in order to avoid the school run.... presumably the developer recognises that there is danger to schoolchildren at this time. The same dangers exist at 3pm when children are collected. Cars park on Hazlehead Avenue awaiting kids coming out. This causes no difficulty at present - however - if the traffic flow is to increase by 92% and HGVs are to be involved then there will be traffic chaos and children will be right at the heart of it. To approve such an application will show a reckless and cold disregard for the safety of young children. The Council have an obligation not to entertain this ludicrous proposal.

(5) In the Planning and Access design Statement SITA admit that the other sites in Aberdeen/Westhill are “regularly congested during busy periods”. What guarantee is there that this will not happen with Grove Nursery? There is no such guarantee. Where is the evidence that current users of other sites will start using Grove Nursery in preference? Surely it's the case that the opening of Grove Nursery centre will mean that residents in the west end who do not use such sites at all at present will start doing so. The pressure on the other sites will not be alleviated and the Grove Nursery site will also be “regularly congested” thus causing queuing of vehicles on Hazlehead Avenue. What statistics are available on the distances travelled by current users of the other sites? SITA/Atkins have figures on just about everything else yet figures on this are distinctive by their absence from the reports and assessments!

**LOSS OF AMENITY**

(1) This development is at the entrance to Hazlehead Park - Aberdeen City's pride and glory in recreational open space. To locate an industrial use in the Park is an act of vandalism. What message are Councillors sending to Aberdeen's citizens and visitors to the City?

(2) Kingswells Park and Ride is hugely underused. The de-selection of the Kingswells site has more to do with the Council's failure to admit to previous calamitous errors in judgement over this “white elephant” rather than it not being a suitable site for this type of centre. It's time to admit this, move on
and not compound the error by making some use now of the space that is there.

(3) It is naïve to believe that no vermin will be encouraged by the centre and that there will be no smell. It’s a rubbish tip! Such a view is based on a somewhat optimistic assumption that all users will thoroughly clean all bottles tins cans etc that are taken to the site.

(4) Hazlehead Park is a beautiful, open green space for family and children and for recreation. It is a safe clean and tranquil environment for the enjoyment of the citizens of our city and its many visitors. It cannot be allowed to be violated in such a way by allowing an industrial processing site at its very entrance. What an insult to the victims of Piper Alpha and their families and friends to have the Park and the Memorial Garden sullied in this way…..it’s shameful to even consider this let alone do it…

This is a truly appalling planning application which must be refused on the grounds stated.

I await your detailed responses with great interest.

Mr Christopher Milne and Mr Michael Legge, local residents, had intimated previously that they wished to address the Sub Committee but decided as all the points they wished to raise had already been covered by other speakers that they would forego their addresses.

Mr Walter Murray, made the following presentation to the Sub Committee:-

My name is Walter Murray and I am a Fellow of the Royal Institution of Chartered Surveyors. From 1975 to 1991 I was a Director of Estates of Grampian Regional council. From 1992 to 1997 I was retained by the City of Aberdeen District Council as a consultant and held the position of Co-ordinator for the Aberdeen City Centre Partnership comprising of City of Aberdeen District Council, Grampian Regional Council, Scottish Homes and Grampian Enterprise.

As Director of Estates I was responsible in the acquisition of a wide range of property for all the major local authority services such as education, social work, roads, water and drainage, police and fire. I was also responsible in the disposal of any property surplus to the Council’s requirements. One of my functions was Industrial Development and I was responsible for a wide range of industrial estates in Aberdeen and throughout the Grampian area. I was also responsible in the construction and leasing of a large number of advance factories, industrial factories and commercial developments.

It is on the basis of the above experience that I wish to address the Development Management Sub Committee about the proposed Recycling Centre (PRC).
One of the principal aspects of any development is the access to the property both on a detailed view of the immediate access and on a view of the strategic access to the property over a wider area.

In the case of the PRC the immediate access to the development is by Hazlehead Avenue. I have read the presentation of Elaine Farquharson-Black and I would fully support what she says about this access. This view of the access is very well supported by the slide show which was presented by Mr Tugwell and which shows the road in actual use. I have also read the report about the access prepared by Fairhurst and Partners, Civil Engineers, Aberdeen, which report, in my view, gives a very accurate picture of Hazlehead Avenue. On the other hand it is very disappointing to read the Transport Statement prepared by Atkins dated April 2011. It is difficult to expect to draw any meaningful conclusions from the report based on information obtained after one of the north-east’s worst winters and with no real information on what is likely to happen in reality if the PRC were to be used during the summer months on a Friday or Saturday, or on a Sunday afternoon when the prospective access of the PRC has to compete with the visitors to the park, golfers, footballers, rugby players and school children aged from 3-12. It is no surprise that the Parent Teachers Association of Hazlehead Primary School takes such an adverse view of the PRC.

In short, I do not consider the Hazlehead Avenue is a suitable immediate access to the PRC.

There appears to be little or no consideration to the strategic access to the PRC. It is very much the “Elephant in the Room” - a large question which everyone can see but everyone studiously ignores.

Go over western areas of the City - from north, these areas - Bucksburn, Heathyfold, Northfield, Mastrick, Sheddocksley, Summerhill, Hazlehead and Craigiebuckler - with large expansion proposed for Bucksburn; expansion for Sheddocksley, Kingswells, Milltimber and another large development at Countesswells of 3,000 houses.

But what would be the strategic access from these areas to the PRC? Going on the basis that the A96 Haudagain roundabout and the A90 are already congested it is likely users from Bucksburn would go to the Scattie Quarry recycling centre, whereas Northfield, Mastrick, Sheddocksley, Summerhill users would go to the Lang Stracht (A944) and, trying to avoid the congestion eastwards on the A90, Kings Gate and B9119 roundabout junction, would go westwards to the A944/B9119 roundabout (light controlled). Users from Hazlehead and Craigiebuckler would have no option but to use Springfield Road (already congested) and B9119 to Hazlehead roundabout (both very congested in the early morning 7.00am- 9.30am and evening 3.30pm to 6.30pm). The users along the North Deeside Road would try to avoid the congested North Deeside Road/Springfield Road route and would probably prefer to go northwards by Kirk Brae or Baillieswells Road to the junction with Countesswells Road at Blacktop.
The Countesswells development (OP58) is scheduled in the emerging plan to be largely completed by 2016 and fully completed by 2023. The development is to have its own recycling centre. However in the present state of the housing market the development at Countesswells is likely to be delayed along with the recycling centre.

The overall result would probably be that users from the North Deeside Road would gravitate to the A944 which is dual carriageway from Westhill to Kingswells and the Lang Stracht.

Councillors will have been surprised that the emerging plan appears to show no connection to the Aberdeen Western Peripheral Road (AWPR). This is to be used as a by-pass and distributor road. When it is built there will be multi-grade access to and from the North Deeside Road (A93), the A944 and A96 roads. It seems a great pity that more use of the AWPR is not being proposed in order to facilitate the development of the western side of Aberdeen. In particular it would appear that the PRC could be better sited to avoid existing congested routes and junctions and make better use of the AWPR.

In considering the strategic access to the PRC, one is struck by the large open space area at Hazlehead Park comprising woodlands, golf courses, sports pitches, park and gardens and ancillary areas. As far as east west traffic is concerned, this area forces traffic in the north to the A944, the B9119 Skene Road/Queen’s Road and in the south to Countesswells Road. In due course when the AWPR is completed, I consider that drivers will favour the A944 route, Westhill - Kingswells - Lang Stracht.

I should like to express my sympathy to the Planning Committee on the pressures exerted by financial cut-backs and increasing Landfill Tax but these pressures should not cause the Committee to make a wrong decision. The PRC has very serious problems as you have heard today and is not suitable for the proposed development. A proper analysis of the strategic access points to a much better located development.

I would strongly suggest that the planning application for the PRC at Hazlehead is refused.

Mr Garry Gerrard, a local resident, put forward the following presentation:

I am speaking today in my capacity as a local resident at Queens Grove, Hazlehead and also as a concerned parent, as my youngest son attends Hazlehead Primary School.

I was born and brought up in the North East and the City of Aberdeen and its heritage is very important to me. Hazlehead Park (including its policies) is one of
Aberdeen’s finest landmarks and is recognised as an area of great natural beauty. It is widely used for sporting and recreational activities. This proposal will destroy all of that.

Let us be clear, I am a strong supporter of recycling and the benefits that it brings to our environment. I recognise that Aberdeen City needs more recycling capacity - that is not in doubt. We must detach the urgent need for more recycling capacity from the site location. The Elected Members should not feel pressurised into supporting this application for the wrong reasons. Serious questions remain regarding the selection process for the Grove Nurseries site being chosen as the preferred location.

At one of the Public consultation Meetings held in Hazlehead Primary School, the SITA representatives present openly admitted that Grove Nurseries was not their preferred location. They said that the site at Kingswells was far more suitable. Their application was only being progressed because it was the Council’s preferred location. I heard this with my own ears and it was witnessed by my neighbour. Ladies and Gentlemen, your Operator does not want to be at Hazlehead Park (and its policies)!

- The loss of amenity
- The safety of our children
- The lack of respect to the Piper Alpha victims and their families
- The traffic congestion
- The noise
- The pollution
- The ecological impact

are individually compelling reasons for this application to be turned aside.

Collectively, they present an overwhelming case for this application to be thrown out without further consideration!

For generations, the beauty, peace and tranquillity of Hazlehead have been treasured.

Convener Dean, Elected Members,

It is your gift to ensure that this is maintained.

It is your responsibility to do the right thing for the good people of Aberdeen.

Mrs Mary MacLeod, a local resident, put forward the following presentation:-

I am a resident in Craigiebuckler, in the immediate vicinity of the intended site for the re-cycling centre.
I submitted a letter of complaint against this proposal at the beginning of October this year.

In order to summarise as well as re-iterate. I feel my own, as well as the other communities, objections are as follows:-

(1) A significant increase to risk of injury of the general public, primarily the concentration of children. Crippling traffic congestion is already a serious issue in the area, and the approach to the proposed centre. Frequent and heavy vehicles will only serve to further aggravate the situation and increase the risk of accident. This is a concern for other motorists as well as young children and local residents.

(2) The centre will undoubtedly handle and produce harmful substances. Whilst these will be under tight control and safety procedure, the risk of miss-management and/or serious accident resulting from harmful substances is created. This is not an acceptable trade-off on the benefits of such a centre in a highly populated area with a concentration of young children on the doorstep.

(3) Reduction of the aesthetic beauty of the area, and loss of further natural environment. Conservation of the environment is an important issue for the good of the community. A degree of loss of this comes not only from the centre’s presence itself but also the heavy flow of large vehicles travelling to and from the proposed site.

It is my own firm belief that it is not essential to have such a plant situated in the heart of a thriving residential area. There must be many alternative reachable locations presenting a more reasonable and balanced assessment of what is acceptable against economic concerns.

One of the members of the Sub Committee asked Mrs MacLeod what she meant by harmful substances. Mrs MacLeod clarified that she meant TV sets, fridges etc.

Mr Bill Good, a local resident, put forward the following presentation to the Sub Committee:-

My name is Bill Good and I am an Aberdonian.

First of all I would like to thank you for arranging this Public Hearing and giving us the opportunity of addressing you today.

I would like to speak briefly on a few points in connection with my objection to the proposal.
Having looked at as much information as I could it appears to me that the Council require to build a recycling site as quickly as possible.

The consultations were limited, but at the meeting of the Housing and Environment Committee on 13 April, 2010 by majority vote, the Grove Nursery site was the approved site for the recycling centre.

The Committee had before it the report from the Director of Housing and Environment which had recommended the Grove Nursery site.

The motion for approval was seconded by a councillor who was also on the Board of SITA.

My impression is that the Grove Nursery site was chosen because it was the easiest site to proceed with quickly in order to meet the desire of the Council to get the centre up and running as soon as possible. In spite of later major objections from the public and the land being green belt these were ignored and the project has been driven ahead hard by the environmental officers.

Now looking at the reports by the consultants employed by SITA.

Each report is headed:
"this report was produced by Atkins for SITA Ltd for the specific purpose of providing a statement in support of a Proposed Recycling centre"
the key words are "in support".

Furthermore

Atkins accept no liability to any person other than SITA.

The reports in parts are very technical but again my impression is that they have been formed to support the proposal.

These include various figures, but all these are estimates and the risk that these are underestimated lie with the Council. The Council are taking the risk and the consequences would be felt by the residents of Aberdeen.

The risk is that if the figures are wrong the result would be chaos at Hazlehead Avenue and the surrounding area - quite frightening.

Now, looking at the reports to your committee from the council officials:

The report from planning department includes statements using words such as, "The development will generate an average daily traffic of 1321 vehicles above the current very light traffic and will increase to 2757 vehicles".

As councillors it is impossible for you to read everything but I am sure you read this report and were guided by it.
It is the word "will" which is used very frequently within the report that I object to. It suggests that these things are going to happen no matter what, but they may not. They are only based on estimates by the consultants.

It appears to me that the other reports from Transport etc all give the green light to the proposal but they are based on believing the consultants reports.

For example in the Transport assessment at para 1.3 it is stated "based on surveys of existing recycling centres"

I requested a copy of the surveys but was informed that these were not carried out by them. Westhill is used as a comparator - why not East Tullos?

Based on their assessment I had assumed that they had carried out the surveys. No mention is made of road widths - why not? Is a width of 5.2metres acceptable? I do not believe so, especially for HGVs.

My point here is that everything is based on estimates from other people. I am a layman in respect of these matters, perhaps this is normal procedure.

But I do understand that the Planning Department recommended a Public Hearing and your committee agreed.

For this I am grateful.

Now to Drains.

SEPA a completely independent body objected to the planning application.

Whereas in the Council Transport assessment at 1.9 it states that "a sustainable drainage system has been submitted which is satisfactory".

An objection has already been lodged against this application by the Scottish Environmental Protection Agency (SEPA) on the 19th of October on the grounds of inadequate surface water drainage details and has recommended that a satisfactory Sustainable Drainage System (SUDS) be demonstrated;

"Whilst the proposed drainage layout plan indicates elements of drainage, there is no overall strategy for the treatment and disposal of surface water across the site. A Drainage Impact Assessment (DIA) is required to be submitted as part of the application and this should clearly indicate what on-site measures for SUDS are proposed, or if all surface water from the site is going to the public foul sewer".

In addition to this objection, no reference is made to drainage by the developer SITA within their Ecological Impact Assessment of August 2011 and the proposed drainage layout from the site by the developer's engineer Atkins does not take into account the following:
(i) the current drainage problems that are known in the area, which have already been previously pointed out to the Council;
(ii) the increase in volume of run-off that will be joining an already congested system;
(iii) the introduction of hazardous wastes and toxins that are likely to be introduced to such a system as a result of disposal at the recycling unit.

Connecting an Industrial drain of this nature to the existing combined surface water and foul drainage system at Woodburn Crescent will pose a serious environmental threat when the system overflows.

Further assessment of the drainage proposals must be performed and be compliant with the SEPA guidelines and recommendations with all of the above issues considered as part of that assessment.

The crux of the matter perhaps is the location of the proposed site.

As I said at the start I am an Aberdonian and to me Hazlehead is an Aberdeen Landmark, nationally recognised.

Anyone I have spoken to about the proposal, including Aberdonians living away from Aberdeen, say "are they mad, this is sacrilege" and that is how I feel.

Hazlehead is enjoyed by parents with babies in prams and grandparents with grandchildren,

By children enjoying the open spaces and play activities,

By football, rugby, tennis players and golfers,

By walkers, cyclists, joggers

And as importantly by tourists who visit Aberdeen.

In this connection I saw that the Council have authorised a further £297,000 to promote Aberdeen as a tourist destination.

Hazlehead should be a place to be proud of.

In addition it is situated between two schools with young children going to and fro and Hazlehead Avenue is too narrow for large vehicles and is fraught with danger for the children.

The whole area is one of beauty and tranquillity.
Additionally the Piper Alpha Memorial - a monument that will remain long after we have all departed, is just a few hundred yards from the proposed site.

The coloured drawings produced by SITA look very sunny, clean and peaceful but this is not how it would look.

Just think of the Tullos site on a summer Saturday or Sunday with huge queues of traffic.

Will not Grove Nursery be busy, noisy, dirty and when it rains it will be even worse.

Not a good place to be with rubbish being dumped, noise, smell and dust.

We should be able to feel proud of our city and landmarks.

I am sure you as Aberdeen City councillors feel the same and will demonstrate this by rejecting this application and your successors will be indebted for your action and foresight.

There being no further presentations to be made to the Sub Committee, the Convener invited anyone present who had not previously spoken to come forward if they felt that a concern which they had or a matter which they felt should be aired, had not been raised.

**Dr Sheridan, a local resident** then addressed the Sub Committee and explained that he found the evidence in the reports to be flawed. He said that the Council should be encouraging a healthy lifestyle and that the Hazlehead Park area was currently used for these purposes. He said that the impact on the local road network had not been taken into account properly and expressed the view that it was very difficult to cross Queens Road at the moment, let alone with an increase in vehicles. He concluded by asking the Council to consider an alternative site and that the decision should be taken based on sound evidence.

**Mr Martin Cracknell** asked if he could clarify the position of Councillor Kevin Stewart on the NEM SITA Board. He said that Councillor Stewart represents the Council on the Board as a Non Executive member, along with other Council officer representatives. He explained that none of these Council representatives were paid. He re-iterated that Councillor Stewart was not a Board member and offered to provide further information regarding the legal responsibilities of the Council representatives on the Board if required.

There being no further speakers, the Convener thanked everyone for their contributions and for raising the points made. She advised that she was very
grateful to the speakers taking their time to be here and for undertaking the research involved for their presentations. She indicated that all the relevant information would be considered and fed back into a final report on the application which officers would prepare for consideration at a meeting of the Development Management Sub Committee either in December, 2011 or January, 2012.

- KATHARINE DEAN, Convener.