

Alex Scott.

PI - Planning Objection to Application No 111468 (Redevelopment of Former Summerhill Academy)

From: "Mastrick, Sheddocksley & Summerhill Community Council"
To: PI PI <PI@aberdeencity.gov.uk>
Date: 10/13/2011 09:25
Subject: Planning Objection to Application No 111468 (Redevelopment of Former Summerhill Academy)
Attachments: Morrisons Objection.pdf

Please find attached objection to this application. I would appreciate confirmation that you have received this message

Thank you
Steve Delaney

Steve Delaney

Chairman, Mastrick, Sheddocksley & Summerhill Community Council

33 Benbecula Road, Sheddocksley, Aberdeen. AB16 6FT

Tel: Mob:

MASTRICK, SHEDDOCKSLEY & SUMMERHILL COMMUNITY COUNCIL

**Steve Delaney,
Planning Officer,
33 Benbecula Road,
Aberdeen. AB16 6FT
20 March 2012**

**Head Of Planning & Infrastructure,
Aberdeen City Council,
Business Hub 4,
Marischal College,
Broad Street,
Aberdeen.
AB10 1AB**

Application Number 111468 (Morrisons Supermarket – Lang Stracht)

Dear Sir/Madam,

With reference to the amended information submitted on 13th March 2012, we would have the following comments.

The removal of bus lanes in the vicinity of the application site is welcomed as is the integration of signalised junctions into the SCOOT system. We believe both these changes will offer some relief in addressing traffic impact created by the proposed supermarket. Whilst we welcome confirmation of the position in this respect, we have grave concerns that these proposals still fail to address the full impact of traffic accessing the store.

In particular we remain very concerned that dedicated right turn lanes have not been included at the two locations suggested in our original submission. We refer to the need for a right turn lane into Morrisons at the Lang Stracht/Fernhill Drive junction to ensure traffic travelling towards Anderson Drive and beyond does not get bottlenecked by traffic accessing the store. Similarly, the Lang Stracht/Stronsay Drive junction needs a dedicated right turn lane feeding into Stronsay Drive. This junction currently bottlenecks traffic traveling eastwards towards Anderson Drive at all times of day.

Although a store at this location would be welcomed by the community it remains our belief that the applicant has failed to mitigate the traffic impact of the store. The mitigation measures at Stronsay Drive/Eday Drive/Stronsay Place and Stronsay Drive/Kings Gate are worthless and will have no effect on traffic using this store. We therefore call on Committee to defer the application in order to address the traffic impact on the Lang Stracht.

It goes without saying that our original letter of objection remains valid and should go to Committee along with this representation.

Yours faithfully



**MASTRICK, SHEDDOCKSLEY & SUMMERHILL
COMMUNITY COUNCIL**

**Chairman
Steve Delaney,
33 Benbecula Road,
Aberdeen.
AB16 6FT**

13 October 2011

**Head Of Planning & Infrastructure,
Aberdeen City Council,
Business Hub 4,
Marischal College,
Broad Street,
Aberdeen.
AB10 1AB**

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**Planning Objection to Application No 111468
(Redevelopment of Former Summerhill Academy)**

Dear Sir/Madam,

Mastrick, Sheddocksley and Summerhill Community Council wishes to make the following representation in respect of this application.

We are not opposed in principle to the building of a large supermarket located off the Lang Stracht, provided substantial measures are taken to mitigate the traffic impact caused by such a proposal. There has been a lack of shopping options in the west of Aberdeen in comparison to other areas of the city and we would like to see our community have the same choices at affordable prices as those available elsewhere.

We welcome the applicant's statement on recycling of refuse arising from the operation of the store. We also commend their proposals with regard to disabled parking spaces and reserved mother and child space in close proximity to the store entrance. We welcome the revised plans showing several pedestrian access routes to the site and statements that various pedestrian crossings are provided within the site. We trust that officials will ensure the number of these proves to be adequate for the expected footfall at the store.

With the Tesco application already approved for Rousay Drive, we have significant concerns about the traffic impact of two superstores within five minutes' walking distance of each other. This is not to say that we have a preference regarding either Morrisons or Tesco, but we do feel that if this application is to proceed, it needs to be very carefully controlled in order to mitigate traffic impact on this main arterial route and preserve a decent level of residential amenity for people living in the area.

The Lang Stracht is a poorly designed road which is subject to significant congestion nearing gridlock at peak times. It is not uncommon to take 15 minutes to drive from Skye Road to the junction with Westburn Road at busy times. This is a distance of just 1.5 miles. We believe the building of a supermarket of this size will generate sufficient additional traffic to gridlock the road completely at morning peak times and add significant

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congestion at other times of day unless the applicant is compelled to make significant contributions towards addressing this issue, something we will set out in greater detail in the course of this submission.

We therefore object to the proposal as currently submitted on the basis of the applicant's failure to address the traffic impact created by the store. However, we're looking for no more than a fair acceptance of the need to address these issues in order to turn this into a viable proposal. We are therefore hopeful that continued negotiation between the Planning Authority and the applicant will go some significant way towards addressing our main concerns which are discussed below.

1. Site Boundary/Road Widening

The plans show the developed area of the site running to the existing boundary on the Lang Stracht on the northern boundary of the site. Acknowledging that this accommodates a feeder lane into the store when heading westwards along the Lang Stracht, it does not allow for any widening of the road. We would therefore request that any approval be deferred pending a re-design to address this issue. The purpose of this suggested widening is discussed next.

2. Addressing The Main Road Junctions

In order to avoid ensure the free flow of traffic in the immediate vicinity of the proposed development we request the following junction improvements. There needs to be a dedicated right turn lane into Morrisons at the Lang Stracht/Fernhill Drive junction to ensure traffic travelling towards Anderson Drive and beyond does not get bottlenecked by traffic accessing the store. Similarly, the Lang Stracht/Stronsay Drive junction needs a dedicated right turn lane feeding into Stronsay Drive. This junction currently bottlenecks traffic traveling eastwards towards Anderson Drive at all times of day but the additional traffic following completion of the store is likely to result in delays exiting the store, on Lang Stracht and on Fernhill Drive unless this issue is addressed. As well as the frustration this will cause for non-store traffic, access to the store will also be disrupted unless dedicated right turn lanes are introduced at both locations.

3. Bus Lanes

We believe the bus lanes on Langstracht to be part of the problem as far as the current congestion goes. It's not that we fail to see merit in bus lanes, in an ideal setting they can be invaluable for keeping public transport moving. We just feel they should only be used at locations where they will serve a useful purpose and should not be used where they create a detrimental effect.

The applicant states that the Lang Stracht has a dedicated bus lane operating at peak times. This is not a statement based on fact as only a small part of its length has bus lanes. The poor design of this road can only accommodate bits of bus lanes dotted along the length of the road. Most of the bus lanes on the Lang Stracht are far too short to be useful to buses anyway and present a hazard to all, by having to dodge in and out of the inside lane as the bus lanes stop and start. This is most obviously seen at the entrance to Lidl where the bus lane is far too close to the junctions with Fernhill Road and the Lidl entrance. There are several other examples of this along the length of this road. Our preference would be to get rid of the bus lanes on this road as they benefit nobody but we accept this is unlikely to find favour with Committee.

However, we would strongly urge the removal of all the short bus lanes on Lang Stracht (of which there are many) which do nothing other than increase traffic congestion. A site visit would reinforce the reasonableness of this request.

4. Traffic Impact

We have read the Traffic Impact part of the Transport Assessment with some concern. We agree with the applicant that the catchment area for this store is the whole of Aberdeen (excluding Bridge of Don) and goes as far out as Westhill. However, their analysis fails to take cognisance of the amount of traffic this will generate. The Tesco development at Rousay Drive has been included as committed development in their calculations, but the proposals in the soon to be approved Local Development Plan such as Maidencraig North, Maidencraig South (750 homes) and the office development at Home Farm, Kingswells (2,500 employees) have been conveniently forgotten. Unfortunately (for the community) the timing of the application appears to be such that its determination will pre-date adoption of the Plan.

As part of the Transport Assessment, the applicant conducted a survey using the industry standard TRICS database to calculate the number of trips expected to the store at specific times of day and on different days of the week. This suggested 395 vehicles movements in morning peak with 901 in the evening peak and 930 in the Saturday peak. The applicant thought these figures were unrealistically high and substituted them with 154 morning peak, 475 evening peak and 537 Saturday peak. Just to confuse matters, the Design & Access Statement suggested different figures with 224 vehicles morning peak and 785 vehicles for both evening and Saturday peak. We could have accepted the accuracy of the original figures as a reasonable estimate, but not the pure fiction which has followed.

These "revised" figures are exceptionally low and appear to be nothing less than an attempt to arrive at figures which support a pre-determined conclusion that the store will result in no net detriment to the roads network. The assertion that all junctions would be working within capacity at all times is quite frankly ludicrous! It would therefore be grossly irresponsible for this proposal to go ahead on the basis of disregarding figures produced by the Scottish Government's approved TRICS database for no reason other to "make it fit" with the applicant's wishes. The resultant net detriment brought to our community would be unsustainable if it remains unmitigated, which appears to be what the applicant is proposing.

Comparisons were made to stores at Giffnock, Johnstone and Stirling on the basis of similar store size. Whilst they may be comparable in size to this proposal, they do not have the population of Aberdeen nor do they have to contend with the pre-existing congestion on the Lang Stracht. The proposed store is very easily accessed from most of the city via Anderson Drive and the Lang Stracht by car, and from Kingswells and Westhill via the Lang Stracht. It will be a popular store and is likely to attract customers who currently use other supermarkets in the city. We honestly believe the output of TRICS to have been a reliable assessment, albeit that it excluded other proposed development in the area. We therefore question the reliability of the subsequently "adjusted" data which was used to justify the theoretical "no net detriment" position.

Similarly, the applicant dismisses the need to include trips to the petrol station in its trip analysis data. We agree that many visits to the petrol station will be made by visitors to the store. However, no cognisance has been taken of the fact that it will be the only petrol station between North Anderson Drive and Tesco at Westhill (with

the possible exception of the Five Mile Filling Station which is only accessible to traffic coming eastwards from Westhill). On that basis local people will use the Morrisons Petrol Station by choice. We therefore believe that some reasonable allowance should be made in respect of this and we question the illogical reasoning behind this approach.

The statement by the applicant that bus frequencies are 10 minutes or better is both completely misleading and untrue. The most frequent service is 12 minutes with others running to 20, 30 and 60 minutes. With the exception of the 30 minute No 13 service (which they mentioned as a No 20 on a 20 minute service) and the 12 minute No 23 service which they erroneously state as 10 minutes, the true frequencies are acknowledged in the application, yet the applicant somehow computes this to equate to 10 minutes or better! Even if they are looking at the waiting time between any two buses passing their store, their logic is flawed because these bus routes serve different areas and customers will, in most cases, only a single service which can take them home. We therefore challenge the reliability of the supplied data.

We also have concerns about anecdotal evidence that 50% of customers will walk, cycle or arrive by public transport. The sample was small and not necessarily representative, yet it is referred to throughout the application as if merely repeating it validates its findings. Transporting messages on a bicycle isn't really feasible and walking is OK unless you have more than a couple of bags of messages, in which case it also becomes unrealistic. Public transport is unlikely to be used for short local trips, though it will undoubtedly come into play with customers coming from further afield. In reality, we need to accept that car journeys will make up the largest number of trips to this store whether or not it's politically correct to acknowledge this. Public transport will only ever become a real option when it becomes frequent, reliable and affordable but that's not a debate to go into in detail here.

In conclusion on this point, there will be a major impact on the local roads network and we can live with that if it is acknowledged honestly and mitigated fairly. We believe the "facts" and figures put forward by the applicant to be a work of fiction. This data is out of touch with reality and contrary to established and accepted methods for data gathering. We would therefore request either the TRICS data be used without adaptation or further independent studies be conducted by Aberdeen City Council prior to determining the traffic impact and the level of mitigation required.

5. Green Transport Plan

Within the Transport Assessment the Green Travel Plan put forward by the applicant is very "woolly". It offers nothing more than making employees aware of alternative modes of transport. The narrative says that it's not possible to formulate the detail of the plan prior to the opening of the store and that it can be reviewed periodically thereafter. This statement is repeated several times. We therefore have concerns that this is no more than a box ticking exercise as Morrisons must have Green Travel Plans for other stores and must know what works and what does not. We therefore believe it would make sense to have an agreed and enforceable Green Travel Plan signed off prior to the opening of the store and request this be applied by way of Planning Condition.

6. Cumulative Impact of Development on Lang Stracht

We believe it to be reasonable to expect Morrisons to make a substantial contribution towards the cumulative cost of improving traffic flow along the length of this road in proportion to the traffic impact created by their superstore. If proposed developments such as Maidencraig North East, Maidencraig South East and the office development at Home Farm, Kingswells (particularly the later phases) go ahead, the impact of these and other smaller development will further impact on the sustainability and viability of this arterial route.

In all fairness to Morrisons it's not solely their responsibility to resolve this, but it would be unacceptable for them to walk away from their responsibility towards the cumulative impact. To put this in context, we believe the potential developers of Maidencraig North East, Maidencraig South East, Home Farm, Kingswells and other smaller developments should also be contributing based upon their own pro rata share of the impact of additional traffic on the Lang Stracht.

We therefore call on Committee to instruct a Lang Stracht Planning Brief as Supplementary Guidance to the Local Development Plan. Development along the length of this arterial route and development which has a direct or indirect impact on this route should contribute towards a central pot of money in order to bring the road design and capacity up to what is identified as being necessary in that Planning Brief.

Such an approach has been followed in the past in Justice Mill Lane and in respect of other areas where it is reasonable to assume a cumulative effect given the scale of expected development. As members will be aware, failure to set up such a facility at an early stage and secure sufficient contributions from major developers such as Morrisons represents a missed opportunity for the city, which is why we urge you to set aside an appropriate contribution towards a major upgrade of the Lang Stracht by way of Legal Agreement attached to any consent in respect of this application.

It is clearly essential that such a Planning Brief be put in place prior to determination of this application, otherwise its effectiveness will be greatly reduced.

7. Community Facilities

Prior to the closure of the Summerhill Centre in order to facilitate the sale of the site, there was a vibrant Community Centre operating from the building. It was the only community facility of its type in Summerhill. Some years earlier the Council made it clear that alternative community facilities would be put in place prior to the closure of this facility. Whilst accepting that the Council was not by that time in a financial position to deliver facilities prior to closure of the site, it is not unreasonable to expect these facilities to be delivered following receipt of Planning Gain in respect of this, which would be expected upon completion of any development of the site.

We therefore ask Committee to ensure that appropriate Planning Gain is secured by way of Legal Agreement in order to deliver a suitable facility. We would also request that the Community Council and the wider community in Summerhill be consulted regarding how best to take this forward.

8. Recycling Centre

We are concerned about the current proposed location of the recycling centre as it is very close to existing residential properties. There will be increased noise from the recycling facilities during store hours and a risk of anti-social behaviour at bottle banks outwith these times. Whilst welcoming the facility, we would request it be moved to a central location within the car park in order to minimise disruption and preserve the residential amenity of those already living in the area.

9. Light Pollution

It was suggested to us by Morrisons that lighting would be switched off outwith operating hours in order to minimise disruption to local residents. However, such an undertaking was verbal and without sanction were it to be breached. We would therefore welcome appropriate conditions to require lighting to be installed in such a manner as to minimise light pollution at all times and to ensure that lighting is indeed switched off outwith the store's opening hours. It is accepted there needs to be a short overlap of perhaps half an hour before and after opening hours in order to ensure the personal safety of staff.

10. Delivery Times/Residential Amenity

Morrisons have advised us they intend having delivery vehicles accessing the site 24 hours a day. We do not think it is reasonable for local residents, especially those whose tenure pre-dates this application, to be denied an uninterrupted night's sleep night after night. My understanding is that bedrooms look onto the site at Gairsay Drive, which only heightens our concerns. As store hours were stated to us as being between 7am and 11pm we would request that deliveries be restricted by condition to these hours. There is also mention in the application of the possibility of using a low acoustic barrier but not a formal offer to do so. I don't fully understand the science behind this, but would ask the matter to be investigated and serious consideration given to using either a low acoustic barrier or a comparable technology in order to minimise disturbance in what is clearly a residential area.

11. Running Engines

In the interests of residential amenity we would also request a condition requiring delivery vehicles to switch off their engines whilst waiting within the site boundary in order to minimise noise (to residents of Gairsay Road) and pollution within the site.

12. Petrol Station

We have no objections to a petrol station as part of this application but the proximity of the petrol station next to existing residences would create significant issues of residential amenity were it to remain open outwith the normal opening hours for the superstore. We would therefore request a condition be imposed limiting the opening hours of the petrol station from 7am to 10pm.

13. Pedestrian Phase of Traffic Lights

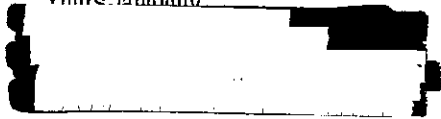
We would ask that the pedestrian phase of existing traffic lights at Fernhill Drive/Langstracht and Stronsay Drive/Langstracht be examined to ensure appropriate time is allowed for pedestrians to cross to and from the proposed store. Our members are of the opinion that current timings do not allow sufficient crossing time, especially for people who are elderly or disabled.

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We trust Committee will give the fullest consideration of these issues and open them up to maximum scrutiny on what is after all a major application in our area. We believe the proposed Morrisons store could work very well with these additional 13 points taken on board. Unfortunately, a failure to deal with these issues would further exacerbate the functionality of this main arterial route, impacting on both local residents and people coming from further afield travelling to and from their place of work.

Thank you for your consideration of these issues

Yours faithfully,



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A Scott Esq
Senior Planner
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Aberdeen City Council
Business Hub 4, Ground Floor North
Marischal College, Broad Street
ABERDEEN AB10 1AB

Our Ref: 22041

29th February 2012

Dear Mr Scott

Planning Application 111468 Summerhill Academy, Lang Stracht, Aberdeen

We have now had the opportunity to examine the addendum report submitted by GVA in support of their client's application for a superstore development at the former Summerhill Academy site on Lang Stracht.

It is noted that GVA have corrected the mathematical errors which we pointed out in our letter of 21st November 2011, but that they have not altered the assumptions, calculations or impact estimates contained in their assessment. Therefore our previous objections to the many deficiencies in their assessment remain applicable. It is also noted that GVA have sought to defend their designation of a very large catchment area, containing more than three times the population of that living within the core catchment area defined by Tesco Stores Limited for their Woodend proposal. GVA argue that it was stated at the outset that Zone 29 of the Aberdeen and Aberdeenshire Retail Study (AARS) should be the 'starting point' for defining the catchment area, and this is not disputed, given that the proposed store is located within, although on the edge of, that zone. However they correctly point out that Zone 28 is also relevant, given that much of the immediate catchment of the new store would fall within Zone 28.

What is disputed is the inclusion within the catchment area of much of Zone 27 of the AARS, which is much more closely associated with Berryden and the city centre than West Aberdeen, and also those parts of Zone 29 which do not naturally fall within the catchment of the proposed new store – in particular postcode sectors AB10.7, AB15.7 and AB15.9, which are much more naturally contained within the Bridge of

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Dee (Asda and Sainsbury) catchment area, and also all of sector AB15.8, most of which is within the Westhill catchment. This exaggerated catchment area – which GVA have not justified in their addendum – together with their assumptions regarding further trade draw from beyond this large catchment area, and 28% of the store's turnover being drawn from unspecified destinations other than the city centre and main food shopping destinations in Aberdeen, combine to render the conclusions of the GVA assessment unreliable.

In paragraph 2.8 of their addendum GVA seek to justify their exaggerated catchment area by arguing that the proposed store will be a 'full format new build' Morrisons store, the attractiveness of which they believe will result in shoppers travelling in large numbers from much further afield. Thus they accept that the store is not designed to serve 'primarily' the West Aberdeen area as required by the local plan, but instead will rely on drawing a large proportion of its trade from well beyond West Aberdeen, contrary to principles of sustainability and the need to minimise the length of shopping journeys. IF GVA had confined their assessment to the much smaller and more realistic catchment area adopted by Tesco in their assessment of the Woodend proposal, they would have been unable to justify their proposal because of insufficient available locally-generated expenditure.

Furthermore the argument that the proposal will provide a 'full format new build' store is of no relevance in the assessment of the planning application, as consideration can only be given to the principle of the proposed store and its likely effects, regardless of the specific operator.

In their assessment of the vitality and viability of existing neighbourhood centres, GVA take no account of the intention in the local plan that Rousay Drive would be elevated to district centre status following development of the superstore there, or the effect which the Summerhill proposal might have on the long-term vitality and viability of that district centre. The development of the superstore at Rousay Drive was recognised as strengthening the overall community function of the units at Rousay Drive, and establishing an enlarged and much improved shopping centre in a highly accessible location, and the likely effect of the opening of a new store at Summerhill on this aim of establishing an improved centre at Rousay Drive, with district centre status, has not been examined.

Accordingly it is considered that there is nothing in the GVA addendum which overcomes our criticisms and objections to their assessment of the Summerhill proposal, which were set out in our letter of 21st November 2011.

We note the comment in your email of 28th February that the view has been taken that no further representations will be received on the application, but we made clear in our letter of 2nd November 2011 that we would wish to make further comments on any response from the applicant to our previous objections. Accordingly we would ask that these further observations be reported to the council's committee when the application is determined. These comments are being submitted within 14 days of the notification which we received from you at 15.33 on 16th February 2012.

29th FEBRUARY 2012

Yours sincerely

Robert Drysdale
Director, RDPC Limited



Direct Tel:
Direct Email:

Our Ref: TRN10697/OBJ2
Your Ref:

Date: 26th March 2012

Head of Planning and Infrastructure
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

Dear Sir/Madam,

Planning Application Ref 111468 - Proposed Class 1 (Foodstore) Development, Car Parking, Petrol Filling Station, Means of Access, Landscaping and Associated Works

Further to our letter of representation (TRN10697/OBJ1) dated 1st November 2011, the additional information submitted by SKM Colin Buchanan in support of the aforementioned planning application, and in response to correspondence received from Aberdeen City Council (TR/KM/1/51/2/6) dated 7th March 2012, we wish to make the following comments.

Waterman Boreham have considered the additional information submitted, and also the letter received from Aberdeen City Council, and would reiterate Tesco's concerns with regards to the Transport Assessment undertaken to support the proposed foodstore development.

We understand that SKM Colin Buchanan have met with Aberdeen City Council officers to discuss the detail of Tesco's concerns, and also a number of outstanding issues. This meeting has been confirmed by a letter from SKM Colin Buchanan to Aberdeen City Council (19877-01-1) dated 13th February 2012, within which a summary of the discussions is provided. It is apparent that the discussions held have informed the response received by Waterman Boreham from Aberdeen City Council (TR/KN/1/51/2/6), and this letter provides Tesco's reply.

Both Tesco and Waterman Boreham continue to have concerns with the SKM Colin Buchanan Transport Assessment. These concerns are as follows;

1. The response received from Aberdeen City Council does not provide any further comfort with regards the trip rate calculations undertaken within the SKM Colin Buchanan study. No detail is provided to substantiate why the trip rates applied are not consistent with the requirements for the equivalent Tesco study, why the inclusion of a petrol filling station has not been appropriately accounted for, why the unique Aberdeen city demographic has not been considered, or why only trip generation information for Morrisons stores has been analysed when the application is for a food retail development.

In the response received from Aberdeen City Council, the difference between the trips rates applied within the Tesco Transport Assessment and that produced for this application, is described as being 'only 7%'. Whilst we would present that the figure will be higher if correct account was taken of the proposed petrol filling station generation; by any standards, 7% is not insignificant given the scale of the Morrisons development and the traffic conditions experienced on Lang Stracht, which is already at or approaching theoretical capacity when considering the impact of the Tesco planning consent.

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Waterman Boreham Limited
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Page 2

2. Waterman Boreham would reiterate the point made previously in relation to the application of a 40% discount on new trips to the proposed development, which has been attributed to passby and diverted/linked trips. This is not consistent with standard practise, particularly with regards to its application during the Saturday peak period, and subsequently significantly underestimates the impact of the proposed development.

The response received from Aberdeen City Council refers to the application of this figure being consistent with available guidance, but does not detail what guidance is being referred to. Standard industry practise would suggest that a combined passby and diverted/linked trips figures of 30% is appropriate for application during the weekday peak periods, and a combined figure of 10% during the weekend peaks. The response further details that 'each individual development should be considered on a case by case basis'; however, no evidence has been presented which demonstrates why the aforementioned trip reductions are appropriate for a food retail development at Summerhill.

3. The trip distribution percentages associated with the discounted diverted/linked trips has been heavily biased towards the A90/Lang Stracht junction, thus resulting in the development having a reduced impact at this location. The response from Aberdeen City Council indicates that they are satisfied with the distribution, but this differs from the approach required for the Tesco Transport Assessment, and no explanation has been offered as to why this would be the case.
4. Aberdeen City Council have confirmed that they will require that the Morrisons development implements the improvements to the junctions at Stronsay Drive/Eday Road, and Stronsay Drive/King's Gate which are to be delivered through the Tesco planning consent and Section 75 agreement. The Council have stated that the assessment work undertaken by Waterman Boreham has identified that these junctions can accommodate the additional traffic generated by the Morrisons application.

Waterman Boreham's assessment work undertaken for these junctions does not in any way account for the inclusion of the proposed Morrisons foodstore, and it does not appear that SKM Colin Buchanan have undertaken detailed assessment work to demonstrate that they will continue to operate within capacity.

Furthermore, the junctions are not something which can be viewed for Morrisons to deliver as an improvement, as suggested by the Aberdeen City Council response. These improvements should be considered as committed development, as Tesco have a live planning consent, and have submitted an RCC application for these to be implemented. It should fall to Morrisons and SKM Colin Buchanan to demonstrate that the additional traffic generated by the Morrisons development can be accommodated at these locations, over and above the committed Tesco development. Waterman Boreham are not aware of any such assessment being available, and subsequently the impact at these locations has not been adequately demonstrated.

5. The detailed junction capacity assessments undertaken within the Transport Assessment indicate significant queues forming at nodes along the Lang Stracht corridor. It is unclear from the report whether the interaction of these queues has been correctly considered, and also whether the reported queues have been calibrated with detailed independent on-site observations. The response from Aberdeen City Council does not provide any further information in this regard, other than to state that they are satisfied. Tesco's position remains that there is insufficient information provided to ascertain whether the Linsig study has been correctly calibrated.

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In conclusion, Waterman Boreham and Tesco's position remains that there are a number of areas which cause serious concern in regard to the Transport Assessment and the methodologies adopted. The response received from Aberdeen City Council does not contain sufficient detail to determine whether the points raised have been adequately addressed.


The methodology and approach of the SKM Colin Buchanan report remains inconsistent with that agreed with Aberdeen City Council for the Transport Assessment undertaken to support the Tesco consent, which is surprising given the proximity of the two developments and their similar catchments.

In particular, the trip rates and associated discounting agreed with Aberdeen City Council have not been adequately justified, and are not consistent with standard industry practise. Also, the development impact at the proposed signal junctions at Stronsay Drive/Eday Road and Stronsay Drive/King's Gate has not assessed in accordance with Tesco's planning consent, and Waterman Boreham's detailed junction assessments do not demonstrate sufficient capacity at these locations to accommodate the proposed development in addition to the Tesco foodstore.

Waterman Boreham also still have concerns over the validity of the detailed junction assessments undertaken on the Lang Stracht Corridor, particularly in light of the figures reported within the Tesco Transport Assessment, and we are not convinced that there is sufficient network capacity to accommodate the proposed foodstore.

Tesco Stores Ltd would request that the committee take account of the aforementioned concerns when determining the planning application.

Yours sincerely


Michael Cummings
Divisional & Operations Director

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Our Ref: 22041

2nd November 2011

Dear Mr Scott

**Planning Application 111468
Summerhill Academy, Lang Stracht, Aberdeen**

Our clients Tesco Stores Limited wish to object to the planning application by Optimisation Developments Limited for development of a superstore on the site of Summerhill Academy, Lang Stracht, Aberdeen.

The objection is based on (1) planning policy, (2) retail impact, (3) design and layout, and (4) transport issues. This letter addresses issues 1 to 3, and the enclosed letter from Waterman Boreham addresses the fourth issue. We would be grateful if the contents of both letters could be carefully considered by your council prior to determination of the application.

1 Planning Policy

Background

- 1.1 The Aberdeen Local Plan which forms part of the Development Plan for the City of Aberdeen was adopted in 2008, following a lengthy public inquiry into objections and consideration by the council of the conclusions and recommendations presented by the Inquiry Reporters. The issue of the need for a new superstore to serve west Aberdeen was one issue which was examined in detail, and involved consideration by the Reporters of a substantial amount of evidence led by the council and by other parties, including Tesco Stores Limited.

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- 1.2 A report on the Reporters' conclusions and recommendations was presented to the council in January 2008. An extract from that report, relating to Issue 239 – the Need for a Superstore to West of City, is included with this objection. Also included is the Reporters' report on the topic. The January 2008 report stated *"The Reporters conclude from consideration of the evidence led that support for a new food superstore to serve west Aberdeen does accord with the structure plan and that there is a need for such development"*. It continued by noting that *"The Reporters found that a failure to identify a site for a new superstore in west Aberdeen does not accord with national guidance and is not consistent with the practice followed in the rest of the local plan. The finalised local plan should identify a specific site for the superstore that it envisages for west Aberdeen. The matters considered for this issue point strongly to designating the OP61 site (Woodend Hospital Annex) as the location for the new west Aberdeen food superstore"*.
- 1.3 In recommending that a specific site be identified for the new superstore, the Reporters – in paragraph 44 of their report – noted that if a site other than Woodend Hospital Annex were to be identified for a superstore, the existing permission on the Woodend site could also be implemented, resulting in *"two major retail developments, possibly in close proximity to each other. No case has been made for this scale of development and nothing has been put forward to show how it could be avoided"*. This evidence led the Reporters to recommend designation of the Woodend site as the location for the new superstore to serve west Aberdeen. It was clear from their approach that they regarded the prospect of two major retail developments in close proximity to each other in west Aberdeen to be unacceptable.
- 1.4 It is clear from the council's submission in response to the objection by Tesco Stores Limited to the proposed Aberdeen Local Development Plan (also attached) that the council has not undertaken any additional analysis of the situation since the recommendations of the Reporters were accepted by the council in 2008. It remains of the view that a new superstore is needed in west Aberdeen, and states that development of either the Woodend site or the current application site *"may meet the need"*. A further observation in the council's submission, regarding the possibility of stores being developed on both sites, is that the impact on the vitality and viability of nearby centres *"would have to be carefully considered"* by way of a retail impact assessment.

Development Plan Position

- 1.5 However the current application has to be determined in accordance with the current development plan, which comprises the 2008 Aberdeen Local Plan and the 2009 Structure Plan. The latter document contains more general strategic aims and objectives and reiterates Scottish Planning Policy that new retail developments should comply with the sequential approach to site identification. The local plan gives support to one superstore in west

Aberdeen on the Woodend site, and to no other superstore developments in the city. Any new superstore proposals are to be assessed against Policies 65A (Sequential Approach) and 65B (Out-of-Centre Proposals).

- 1.6 As regards Policy 65A, the applicant's consultants have undertaken a brief assessment of the scope for existing centres to accommodate their proposal. They dismiss the suitability of the Woodend site in paragraph 4.21 by suggesting that it is *"not a suitable site to convenience retail occupiers"*, notwithstanding the fact that its owners Tesco Stores Limited – who are the leading convenience retailer in the UK – participated at length in the Aberdeen Local Plan Inquiry to argue the case for development of the Woodend site for a superstore to serve west Aberdeen, subsequently submitted a planning application for a superstore on the site, obtained a resolution from the council for approval of the store in November 2008 and then devoted two years of efforts to secure agreement with the council regarding the terms of a complex legal agreement to provide for local road alterations and improvements, culminating in the grant of planning permission in November 2010. Since then Tesco Stores Limited and its consultants have been working on the detailed designs of the store and the site preparation requirements including diversion of services to enable the development to proceed. Implementation of the development is now imminent. None of these actions suggest that Tesco Stores Limited regard the site as unsuitable for convenience retailing.
- 1.7 As regards Policy 65B, there are five criteria to be satisfied when out-of-centre retail proposals are to be assessed, and failure to satisfy any of these criteria required that planning permission should be refused. There is no dispute by the applicant that the site is out of centre.
- 1.8 The first test of the policy is that there are no other suitable sites in a location acceptable in terms of Policy 65A is available or likely to become available. The applicant's consultants argue in paragraph 4.28 that they have not considered neighbourhood centres as possible locations because the terms of Policy 65A appears to rule them out as regards large convenience stores. Accordingly they have only considered town and district centres and have dismissed them as offering no development opportunities. However they have failed to consider the proposed district centre at Rousay Drive, notwithstanding the fact that the Woodend site at Rousay Drive has planning permission and that its implementation would result in the Rousay Drive location becoming a District Centre in accordance with the adopted Local Plan.
- 1.9 As regards the second test of Policy 65B, relating to the potential of the development to have a significant adverse effect on the vitality or viability of any designated retail location, the consultants refer to their retail impact assessment which is considered below. Similarly the third test, which relates to the existence of retail deficiencies, they refer to their retail impact study and again we consider this point below. In both cases we show below that

the proposal fails to comply with the requirements of these clauses of Policy 65B.

- 1.10 Consequently there is no requirement to consider the remaining tests of Policy 65B, because failure to comply with any of them necessitates refusal of the application.

Location of the Store in the Area of Need

- 1.11 One of the greatest benefits of the Woodend site at Rousay Drive in meeting the need for a superstore to serve west Aberdeen is its very central location within that area, thus minimising the distances which people have to travel to reach the store. The Summerhill site, by contrast, is located considerably further east along Lang Stracht and therefore less accessible to the majority of those living in the area of need.
- 1.12 This point is recognised and verified by the consultants for the applicant, in paragraph 6.48 of their report, where they state that the Tesco site at Rousay Drive has a *“more central location within the catchment”* than any other location assessed by them, including the application site at Summerhill. Thus the applicant’s consultants themselves recognise the significant advantage which the Tesco site enjoys over the Summerhill location.

Policy Conclusions

- 1.13 There is a recognised need for a new superstore in west Aberdeen, and the adopted Aberdeen Local Plan makes clear that this should be provided at the Woodend Annex site at Rousay Drive, which is well located within the area of identified need. The Reporters to the Local Plan Inquiry insisted that a specific site should be allocated to ensure that the prospect of two major retail developments in west Aberdeen was avoided, because no case had been made for more than one. The current application clearly proposes a second major retail development only a short distance away from the site allocated in the Local Plan, which would be directly contrary to the terms of the plan and for which there is no need. Furthermore the proposal does not satisfy the tests to be applied to out-of-centre retail applications, and as such the terms of Policy 65B require that the application be refused.

2 Retail Assessment

- 2.1 The applicant’s retail assessment has been undertaken by GVA Grimley. It is considered that the assessment contains unsupportable assumptions which lead to incorrect conclusions, for the following reasons.

Catchment Area

- 2.2 The defined catchment area for the proposed Summerhill store extends westwards almost to Westhill and includes Kingswells, south-west to include Bieldside, southwards to include Cults, northwards almost to Danestone and well into the Danestone catchment, and eastwards to include most areas of inner Aberdeen apart from the City Centre itself. Consequently it includes many parts of the inner city where residents would naturally gravitate towards other more convenient existing stores for their food shopping needs – particularly the Asda on Beach Boulevard, the Sainsbury at Berryden and the Morrisons on King Street. Residents of Kingswells would naturally look to Westhill for its shopping needs, and the NEMS survey conducted on behalf of the applicant illustrates this.
- 2.3 In the report to Aberdeen City Council in January 2008, in which the findings and recommendations of the Reporters who considered objections to the Aberdeen Local Plan were presented to committee, it was confirmed that there was a need for a new superstore in west Aberdeen and that the Woodend Annex site should be identified for the purpose. It was also stated that the new superstore should have *“a catchment that is confined to west Aberdeen and this is the area where need has been established. A larger catchment would attract a greater volume of traffic, to the detriment of local amenity and contrary to the aim of reducing travel. The importance of this part of the local plan is such that it merits an associated policy”*.
- 2.4 This requirement was translated into Policy 62 ('New Superstore') of the adopted Local Plan, which states that proposals for a new food superstore must *“demonstrate that customers will come primarily from west Aberdeen”*.
- 2.5 Paragraph 3.49.6 of the Local Plan, as adopted, further states that the store must be well located to serve the main concentrations of population and served by frequent public transport. The Rousay Drive site was recognised to achieve this requirement.
- 2.6 The retail assessment submitted by Tesco Stores Limited for the Rousay Drive development identified a core catchment area which was very much confined to the west Aberdeen area, including only the postcodes of AB15.6 and AB16.6, plus around 25% of postcode AB15.8, which are those parts of west Aberdeen lying to the west of North Anderson Drive and to the north and south of Lang Stracht, plus postcode AB16.5 which straddles North Anderson Drive adjacent to postcode AB16.6. The estimated population of this area in 2011 (as estimated in 2008) was 24,219 persons.
- 2.7 Furthermore the assessment by Tesco showed that the store would draw 75% of its turnover from this core area, thus conforming to the requirement in the local plan that it would draw trade primarily from west Aberdeen.

- 2.8 The assessment by GVA Grimley for the applicant proposes a primary catchment area with a population of 76,937 persons in 2011, more than three times the core catchment for the Tesco proposal, and extending well beyond the west Aberdeen area. It includes areas whose residents would be very unlikely ever to choose to shop in the west Aberdeen area. For a large proportion of the population living in the eastern part of the applicant's primary catchment area, the Sainsbury's store at Berryden, the Asda at Beach Boulevard and the Morrisons store at King Street would be far more convenient.
- 2.9 By identifying a primary catchment which extends well beyond the boundaries of west Aberdeen and includes an additional 52,718 persons, the applicant's retail assessment is demonstrating a clear and very substantial breach of the requirements of the adopted Local Plan.
- 2.10 In Table 9, the consultants set out estimates – taken from the NEMS survey – of the amount of each shopping destination's turnover which is taken from the primary catchment area, and from this they estimate the market share of each destination – i.e. the proportion of the convenience spending generated by residents in the catchment area which is drawn to each destination. The table shows that the Asda at Garthdee achieves a 17% market share, and the Sainsbury's at Berryden Road a 15% market share. It also shows that city centre convenience shopping facilities achieve a 14% market share.
- 2.11 Because the City Centre is located outside the Primary Catchment Area, this 14% flow of expenditure is described as 'outflow' or leakage from the Primary Catchment Area. In reality, a large proportion of this spending ought to flow into the City Centre because it is generated in those areas closest to the City Centre, not in west Aberdeen. Thus it cannot be described as 'leakage' or 'outflow'.
- 2.12 Paragraph 6.3 of the study claims that the total outflow amounts to £73.98 million, which is 45% of the total available convenience spending in the Primary Catchment Area. It is then argued that this £74 million represents 'deficiency' in convenience shopping provision. In reality this is a gross exaggeration of the level of outflow, because so much of the defined catchment area includes areas which are not located within west Aberdeen and which are already well served by convenient existing superstores. These areas are not located within the area of identified need, they would not be better served by a store at Summerhill than by their existing closer stores, and thus the spending which they send to these convenient existing stores does not amount to leakage, nor is it any demonstration of deficiency.
- 2.13 If one examines the level of spending available in the true west Aberdeen area, by referring to Table 2 in the consultants' report – confining the calculation to those postcode sectors identified by the Tesco assessment as being located in west Aberdeen (AB15.6, AB16.5, AB16.6 and approximately 25% of AB15.8), the estimated available spending is £50.5 million in 2014.

The consultants have estimated that the combined turnover of the Tesco commitment and the new Morrison's store – trading in competition with each other – would be £55.73 million, which exceeds the total available spending in the west Aberdeen area by more than £5 million. Given that existing shopping facilities located in the four postcode areas AB15.6, AB16.6, AB16.6 and the eastern part of AB15.8 (at Mastrick, Midstocket, Sheddocksley and Cornhill) already account for £9.76 million according to the consultant's figures (Table 7), the total turnover demand in the area would be £65.5 million, or £15 million more than the amount of available spending.

- 2.14 Even if only 75% of the combined turnover of the Tesco and Morrison's stores was taken from the west Aberdeen area – i.e. £41.8 million – it would be impossible to support the turnover of both the new superstores and existing retail facilities unless all the residents of west Aberdeen were prepared to spend their money solely in the new stores and existing centres in west Aberdeen, and not spend anything in the City Centre or in any of the other centres which they currently visit. In other words leakage from west Aberdeen would have to reduce to zero, the combined market share of the new stores and existing shops in west Aberdeen would have to be 100%, and there would have to be an inflow of expenditure to the new stores of some £15 million from other parts of Aberdeen. This is a wholly unrealistic proposition. The Tesco assessment assumed that the new store at Rousay Drive would achieve a 35% market share within the west Aberdeen core catchment, in recognition of the fact that travel-to-work patterns and the mobility of shoppers will mean that a significant amount of spending will always be exported to other areas of the city, particularly the City Centre.
- 2.15 The consultants for the applicant estimate, in their Table 16, that the combined market share of the two new stores in their Primary Catchment Area would be 34% – but this is 34% of a catchment of 75,130 people with a spending power of £164.4 million in 2014, rather than the west Aberdeen catchment of around 24,000 persons with a spending power of £50.5 million. In order to achieve a combined turnover of £41.8 million from the west Aberdeen area, the market share of the two stores in that area would need to be 83%, which would be an impossibly high target. Thus again the adoption by the applicant of an excessively large and unrealistic catchment area – and one which is in conflict of the requirements of the local plan – results in a misleading impression of the true impact of the proposed Summerhill store.
- 2.16 Thus the statement in paragraph 6.53, that the assessment in Tables 1 to 14 clearly demonstrates an outflow of convenience spending sufficient to justify the new store, is not supported by detailed analysis. Instead our analysis has demonstrated that the catchment area identified by the consultant is around three times larger than the area of need, and that the area of need itself cannot support two new superstores.

Trade Diversions and Predicted Impact

- 2.17 Table 15 in the GVA Grimley study sets out the consultants' estimate of likely trade diversions from existing retail facilities to the new Morrison's store.
- 2.18 The methodology for the assessment is not properly explained. The assumptions regarding trade diversion are made across the catchment as a whole, so it is not possible to examine the consultants' assumptions of diversions for each postcode area or even for sub-areas of the catchment. In particular, as regards what ought properly to be regarded as the core catchment of west Aberdeen (rather than the much larger Primary Catchment Area defined by the applicant), no evidence is presented as to the proportions of trade currently passing from this core area to existing retail destinations which will be diverted to the Morrisons store. This imprecision reflects the fact that while the base data from the NEMS survey is very detailed, the actual analysis of trade diversion is cursory, superficial and inadequate.
- 2.19 The consultants estimate that 20% of the new store's trade will be diverted from the new Tesco store at Rousay Drive, 23% from the Garthdee stores, 10% from the Tesco store at Danestone, 10% from the Sainsbury's at Berryden, and 5% from stores in the City Centre, but a further 28% from unspecified 'other' retail destinations located outside the Primary Catchment Area. Given the likelihood that the vast majority of those customers choosing to shop at the new Morrisons will currently be using the stores at Garthdee, Berryden, Danestone and the City Centre, or will have already diverted to the new Tesco at Rousay Drive, the notion that 28% - or £7.83 million - of the new store's trade will be diverted from unspecified retail destinations located beyond the Primary Catchment Area is not plausible. It is far more likely that the consultants have greatly underestimated the impact which the new store will have on existing retail facilities located across the Primary Catchment Area. It is likely that the impact on the new Tesco store has also been greatly underestimated.

Implications for Assessment of the Proposal against Policy 65B

- 2.20 The adopted Aberdeen Local Plan designates the shopping centre at Rousay Drive as a neighbourhood centre which is to be elevated to District Centre status following development of the new Tesco store. In the proposed Aberdeen Local Development Plan it is to remain as a neighbourhood centre, with the council having given evidence to the examination of the LDP to the effect that consideration will be given to designating Rousay Drive as a District Centre if the Tesco store is developed. The GVA Grimley assessment assumes that the Tesco store will be developed, and thus in terms of the current approved Development Plan their assessment ought to regard the Rousay Drive centre as a designated District Centre.

- 2.21 The application site at Summerhill is an out-of-centre site which requires to be assessed against Policy 65B. The second clause of that policy requires that there should be no significant adverse effect on the vitality or viability of any District Centre. The consultants have estimated an impact of 18% on the Tesco store, and we have explained why that estimated impact is likely to be a considerable underestimate – an impact which would be likely to adversely affect the vitality and viability of a designated District Centre. The third clause of Policy 65B requires there to be a deficiency in quantitative or qualitative terms, and we have shown that there will be no quantitative deficiency after development of the Tesco store, and the existing qualitative deficiency will also have been overcome. Thus the applicant's retail impact assessment fails to demonstrate compliance of the proposal with the requirements of Policy 65B.

Other Comments

- 2.22 There are other deficiencies in the GVA Grimley assessment which require some comment.
- The estimation of market share on the basis of standard national company average turnovers is flawed. Market share – and thus turnover - will depend on the attractiveness of the retail facility, the level of competition, the spending power of local residents, transport facilities, and other socio-economic factors. It is wholly unrealistic to use company average turnovers to estimate market share. Indeed the NEMS survey demonstrates that the existing retail facilities in Aberdeen achieve a wide range of turnovers that do not correspond with company averages, as shown in Columns 1, 2 and 3 of Table 9. Thus there is no basis from the available evidence for the statement in paragraph 6.33 of the consultant's report that "the actual turnover of the stores are likely to be closer to the benchmark company average turnover". Indeed the main effect of Table 9 is to demonstrate that reliance on company average turnover figures can be extremely misleading and inaccurate, and the figures in Table 3 are of minimal assistance to the overall assessment.
 - Table 7 presents a matrix of the estimated distribution of expenditure from each postcode area to each shopping destination, based on the market share figures set out in Table 6. The columns in Table 6 each total 100%, confirming that the table shows the total distribution of convenience spending from each zone. Thus the totals at the bottom of each column in Table 7 should correspond to the total available spend in each postcode sector, as set out in Table 2. However the totals of the columns in Table 7 bear no resemblance to the totals in Table 2. Our Table A illustrates the discrepancies and shows that the totals in Table 7 add up to nearly £365 million, or £103.75 million more than the total available spending shown in Table 2. There is no explanation for this discrepancy nor any explanation of how the totals in Table 7 are derived.

Table 7 therefore gives a grossly misleading impression of the amount of available spending in the specified catchment area.

- In the context of seeking to make the case for a second superstore in west Aberdeen, a conventional approach would be to assess the cumulative impact on existing centres of two superstores being developed, particularly given the terms of Policy 62 and its concerns for local centres, and the requirements of Policy 65B. This is also a requirement of paragraph 64 of Scottish Planning Policy. However the applicant's assessment in Table 15 only shows the estimated impact of the Morrison's store alone.

Conclusions on Retail Impact

- 2.23 We have shown that the assessment carried out by the applicant's consultants has adopted a catchment area which greatly exceeds any reasonable interpretation of the area which comprises the identified area of need – i.e. west Aberdeen. Instead the consultants have included many areas of Aberdeen which would not naturally look to the Summerhill location for their food shopping needs and which are conveniently served by existing superstores. By exaggerating the size of the catchment so that it is approximately three times the size (in population terms) of the area of west Aberdeen, they have then sought to show a high level of leakage from the catchment, but much of this 'leakage' is actually spending which would naturally flow to other destinations rather than to west Aberdeen.
- 2.24 An alternative assessment, examining the available spending in the west Aberdeen area itself, shows that there would be barely sufficient spending to support two new stores and existing shopping facilities, even if a significant proportion of the stores' trade was drawn from outside the area and if expenditure leakage was reduced to zero. In a large urban area with complex travel patterns and a wide choice of superstores, no area will ever retain all of its locally-generated spending and the concept of zero leakage is not plausible, which means that there is insufficient expenditure to support two stores in west Aberdeen. The need in west Aberdeen – both quantitative and qualitative – will be well met by the development of one superstore at Rousay Drive. The applicant's assessment greatly underestimates the likely combined impact of two stores and does not demonstrate any case for a second store.

3 Design and Layout

- 3.1 In bringing forward their proposals for the new superstore on the Woodend site at Rousay Drive, Tesco Stores Limited were urged by the council's planning officials to locate the store at the site frontage, close to Lang Stracht, so as to ensure that the store was convenient for shoppers arriving on foot and by bus, and to contribute to the streetscape along Lang Stracht.

Accordingly Tesco proposed a striking and highly attractive building on two floors, located at the north (front) end of the site with a glazed atrium fronting onto Lang Stracht, making a very positive contribution to the street scene, and providing convenient routes for pedestrians to gain access to the store from all directions.

- 3.2 In contrast with this approach, the layout of the proposed Morrisons store provides no contribution at all to the streetscape, being set towards the rear of the site with the car park in front. There is only one reasonably direct route for pedestrians into the store, from the side road Stronsay Drive, while pedestrians approaching from the west or north and entering from Lang Stracht have to take a very circuitous route into the store. The whole development is very much less pedestrian-friendly than the Tesco proposal. Furthermore the Tesco development has the added advantage of being well linked to the adjacent shops in Rousay Drive and enabling Tesco shoppers to use and support these adjacent facilities.

Having regard to all these points, our clients consider that the application 111468 should be refused planning permission by your council because of its conflict with the policies of the development plan, the lack of sufficient expenditure within the west Aberdeen area to support the turnover of the store together with existing local shopping facilities and the committed superstore at Rousay Drive, the likely harm to the vitality and viability of recognised centres in the shopping hierarchy defined in the adopted Local Plan, and for the reasons set out in the attached letter from Waterman Boreham.

Should the applicant wish to respond to the comments contained in this letter or the attached letter from Waterman Boreham, we would be grateful for the opportunity to make further comments thereafter.

Yours sincerely

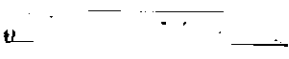

Robert Drysdale
Director, RDPC Limited

Table A
Comparison of Estimated Convenience Expenditure in Tables 2 and 7

	2011 Convenience Expenditure £m (Table 2)	2011 Allocated Spend £m (Table 7)	Excess Spend £m
AB15.6	11.60	16.56	4.96
AB16.5	19.28	29.29	10.01
AB16.6	15.62	21.65	6.03
AB15.5	7.29	11.61	4.32
AB16.7	21.43	27.71	6.28
AB15.4	8.45	14.47	6.02
AB15.7	9.44	16.37	6.93
AB15.8	18.06	25.13	7.07
AB15.9	14.34	25.58	11.24
AB25.3	10.47	16.95	6.48
AB25.2	12.27	20.76	8.49
AB10.7	17.12	29.88	12.76
Sub-total	165.37	256.73	91.36
AB21.9	14.79	15.45	0.66
AB13.0	5.38	8.79	3.41
AB14.0	9.88	15.52	5.64
AB32.6	24.44	26.03	1.59
AB31.5	16.17	17.02	0.85
AB21.7	11.79	12.03	0.24
AB21.0	13.35	13.35	0.00
Sub-total	95.80	108.19	12.39
Total	261.17	364.92	103.75

3 Summerhill Terrace
Aberdeen AB15 6HE

Planning and Sustainable Development
Marischal College
Broad Street
Aberdeen AB10 1AB

25 October 2011

Planning Application Foodstore development, car parking, petrol filling station, landscaping, associated works

Ref No 111468

I object to the above proposed development at the former Summerhill Academy on the grounds of the excessive traffic congestion that will result.

This development would result in there being three supermarkets, Lidl, Tesco (for which planning permission has already been granted) and this one being applied for by Optimisation Developments (widely publicised as being for Morrisons) within a few hundred yards of each other. This would create massive traffic snarl-ups on what is already a very busy route, in addition to that resulting on connecting routes, particularly North Anderson Drive and Kingsgate.

To avoid the worst of this, many potential customers will "rat run" in adjacent residential streets, causing substantial loss of amenity to householders living there.

Establishment of the two supermarkets will impact on the viability of local shops, some of which might well close, further increasing traffic volume when their customers turn by car to the more distant supermarket area.

Mr

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Mr A C McDougall
Summerhill House
17 North Anderson Drive
Aberdeen AB15 6DZ
31 October 2011

TEL: [REDACTED]

E-mail: [REDACTED]

Planning and Sustainable Development
Aberdeen City Council
Marischal College
Broad Street
Aberdeen AB10 1AB

**Planning Application Ref No 111468
Foodstore Development etc**

I register my objection to this proposed development at the former Summerhill Academy, Lang Stracht, on the following grounds:

1. CONTRARY TO THE ABERDEEN FINALISED LOCAL PLAN

The current Local Plan identifies only one Opportunity site, 61, at Rousay Drive, Langstracht, for a foodstore. Planning consent has already been granted to Tesco, who own the site, for a large food Superstore, and I understand that Tesco currently intend to develop the site accordingly.

The Reporter in his findings after the Public Inquiry (Issue 39, paragraph 44) noted:

"If..... a site other than OP61 were identified for the new food superstore, the owner of OP61 would still be able to proceed with the retail development for which planning permission exists. This would result in two major retail developments, possibly in close proximity to each other. No case has been made for this scale of development and nothing has been put forward to show how this could be avoided. Revocation of the existing planning permission might be a legal possibility, but might be quite impractical for financial reasons."

At no time during the Inquiry, or in approving the current Local Plan, did the Council suggest the former Summerhill Academy for a foodstore. The fact that the Council later advertised the sale of that site for various options, including retail development, and have subsequently agreed the conditional sale of the site to Morrisons for a food superstore, does not in itself modify the Local Plan. or over-ride the Reporter's concerns.

2. TRAFFIC CONCERNS and LOSS OF RESIDENTIAL AMENITY

I object to the possibility of there being two nearby food superstore developments on the Lang Stracht in addition to the existing Lidl's site, because of the significant implications for increased traffic volumes, not only on the Lang Stracht itself, but also on the Trunk Road North Anderson Drive, both with heavy concentrations of commuter and freight traffic. In addition there would inevitably be unacceptable increases in traffic on all the adjacent residential streets leading to the Lang Stracht from north and south. Of these, Stronsay Drive in particular and Summerhill Terrace, both already restricted by traffic pinch points and road humps, serve Fernilea and St Peter's primary schools, with clear and unavoidable safety issues for young children. The increase in traffic would also have serious implications for residential amenity in the area.

Strong representations have already been lodged by the local Community Council in relation to traffic issues, and the apparent significant dilution of assessed traffic volumes in the reports relating to the Application.

3. RETAIL IMPACT

Major implications are likely for the vitality and viability of other food retailers in the area. Following the Inquiry, the need for one food superstore for the west of Aberdeen has been established, but not two. Mastrick District Centre, Lidl's, and many other smaller shops in the immediate area would be at risk, with consequent risk of job loss, even with new jobs at an approved development.

This loss has been reliably assessed on a national basis at -276 full time retail equivalents per superstore within a 10 -15 km catchment area.

(see "The impact of out-of-centre Food Superstores on Local Retail Employment" -1998 Porter & Raistrick, Corporate Analysis, The Boots Company PLC)

4. OTHER MATTERS

In view of the Council's interest in the site, Planning legislation would require any willingness to approve to be referred to the Scottish Executive to decide whether to grant final approval.



Allan C McDougall

Direct Tel: _____
Direct Email: _____

Our Ref: TRN10697/OBJ1
Your Ref: _____

Date: 1st November 2011

Head of Planning and Infrastructure
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

Dear Sir/Madam,

Planning Application Ref 111468 - Proposed Class 1 (Foodstore) Development, Car Parking, Petrol Filling Station, Means of Access, Landscaping and Associated Works

We wish to object to the above planning application on behalf of Tesco Stores Ltd, who are the owners of a development site at the former Woodend Hospital Annexe, Rousay Drive, Aberdeen. This site has an extant planning consent for the development of a Superstore, Access Roads, Service Yard and Car Park under reference number A8/0398 which was granted on the 25th November 2010.

In support of application 111468, and on behalf of Optimisation Developments Ltd, a Transport Assessment was undertaken by SKM Colin Buchanan to examine the impact of a proposed 68,146sqft Gross Floor Area (GFA) Foodstore on the local transportation network.

Waterman Boreham have undertaken a review of the SKM Colin Buchanan Transport Assessment, and have identified a number of areas where our client has concerns with the study. These concerns are as follows;

1. The analysis has utilised vehicular trip generation rates based on stores which are not consistent with the Aberdeen demographic, and are lower than those requested by Aberdeen City Council to be included within the Transport Assessment associated with Tesco's application. As both applications are of a similar scale (although the Morrisons proposal includes for a Petrol Filling Station) and location, it follows that the trip generation should be similar. This has resulted in an underestimation of the vehicular trip generation of the proposed foodstore, and subsequently its impact on the local and trunk road network.
2. Also in relation to the trip generation calculations, it is unclear why only Morrisons' survey information was considered. The planning application is for a food retail superstore, and discounting other retail operators, particularly those sites in Aberdeen, is likely to have underestimated the potential vehicular trip generation associated with the site. Of concern is that Aberdeen and its surrounding catchment has a unique demographic in relation to car use and ownership, which is not considered within the trip rates used.
3. The stand-alone vehicular trip generation associated with a Petrol Filling Station (PFS) in this location has been underestimated. Lang Stracht is a major arterial route into the centre of Aberdeen from the west, serving Kingswells and Westhill, and experiences significant commuter traffic flows. As such, a PFS in this location could be expected to generate a significant number of vehicular trips in its own right.
4. It is unclear from the SKM Colin Buchanan report whether the traffic surveys which were undertaken to provide the baseline data were independent, and the calculated peak hour periods cannot be established as correct, as the base survey data has not been included for examination.

Cont...

2-4 Canning Street Lane, Edinburgh EH3 8ER
t: _____ w. www. _____

5. The Transport Assessment has considered the application of a 40% discount of new vehicular trips associated with passby and diverted/ linked trips. This assumption has been applied to both the weekday and Saturday peak trip generation figures, and is not consistent with either industry standard practise. The application of such a discount significantly underestimates the new trips associated with a development of this type.
6. The trip distribution percentages associated with the discounted diverted/linked trips has been heavily biased towards the A90/Lang Stracht junction, thus resulting in the development having a reduced impact at this location. No detail is provided as to how these figures were calculated.
7. The analysis work undertaken does not include the committed improvements at the King's Gate/Stronsay Drive and the Eday Road/Stronsay Drive, but includes other improvements which Tesco are delivering as part of their planning consent. Both of these junctions are being signalised as part of the Tesco planning consent to improve accessibility, and the SKM Colin Buchanan Transport Assessment does not account for this, and therefore the junction analysis is invalid.
8. The detailed junction capacity assessments undertaken within the Transport Assessment indicate significant queues forming at nodes along the Lang Stracht corridor. It is unclear from the report whether the interaction of these queues has been correctly considered, and also whether the reported queues have been calibrated with detailed independent on-site observations.

In conclusion, Waterman Boreham would consider that the Transport Assessment undertaken by SKM Colin Buchanan does not appropriately demonstrate the development's impact on the Local and Trunk Road network, and raises serious concerns as to whether the proposed development can indeed be accommodated.

The methodology and approach of the SKM Colin Buchanan report is inconsistent with that agreed with Aberdeen City Council for the Transport Assessment undertaken to support the Tesco consent, which is surprising given the proximity of the two developments and their similar catchments.

The concerns highlighted in this letter indicate that the vehicular trip generation associated with the proposed development has been significantly underestimated, and has been calculated using unrepresentative sites. Furthermore, the detailed junction assessments which have been undertaken by SKM Colin Buchanan do not take account of the Tesco junction improvements proposed at Eday Road/Stronsay Drive and King's Gate/Stronsay Drive, and therefore do not demonstrate the development's impact at these key locations.

Waterman Boreham also have serious concerns over the validity of the detailed junction assessments undertaken on the Lang Stracht Corridor, particularly in light of the figures reported within the Tesco Transport Assessment, and we are not convinced that there is sufficient network capacity to accommodate the proposed foodstore.



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TRN10697/OBJ1

In light of the above mentioned concerns regarding the applicant's Transport Assessment, Tesco Stores Ltd would ask that the committee refuse to grant planning permission for the proposed development. We also reserve the right to provide further comment on any future related submissions.

Yours sincerely

A large black rectangular redaction box covering the signature of Michael Summers.

Michael Summers
Divisional & Operations Director



Registered with the Civic Trust
Registered Charity Number SC003089
Honorary Secretary: Mr A Struthers

Aberdeen Civic Society
c/o 77 Headland Court,
ABERDEEN
AB10 7HW

Td

Enterprise, Planning and Infrastructure
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

21 October 2011

Dear Dr Bochel

P111468 – Summerhill Academy –Supermarket

The Society has considered the above application and wishes to comment as follows:-

We trust adequate traffic management procedures will be followed.

We would be grateful if our representation could be given consideration.

Yours sincerely

Alastair Struthers

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 14/10/2011 14:41
Subject: Planning Comment for 111468

Comment for Planning Application 111468

Name : Aberdeen Cycle Forum
Address : 24 Loanhead Terrace
Aberdeen
AB25 2SY

Telephone:

Email:

type :

Comment : ACF has looked at this application. We are pleased to see the proposals include covered cycle parking as well as pedestrian and cycle access from Stronsay Drive and Gairsay Road. We do have some comments to make and trust that you will take these on board:

1. There is currently a high quality mandatory textureflexed cycle lane along this stretch of the Lang Stracht. The new junction will cut into this and the left turning lane presents a risk point for cyclists, the obvious risk being that vehicles will cut across them. This is a significant diminution of cyclists safety, with potential cyclist-vehicle conflict where currently there is none. It is important that you do what you can to reduce risk at this point. We would advise that there is no break in the cycle lane ie that it is continuous on the straight ahead lane, with advisory markings where vehicles access the left turn lane. This will act as a signal to drivers that cyclists may be going straight ahead. There is an example of this in Dyce on the north section of Riverview Drive.
2. There should also be a mandatory cycle lane continuing along the left turn lane to the ASL.
3. There should be ASLs at all arms of the junction, including the new junction with the Lang Stracht. There should also be an ASL on Stronsay Drive at the LangStracht junction.
4. The access points off Stronsay Drive and Gairsay Rd should be of the required standard; at least 3m wide; signed as shared use; and with drop kerbs to allow cyclists access from the road.
5. The cycle parking on the plan is inadequate. The location is good and it is covered which is also required but the number of stands is too low. The guidelines in Cycling by Design would require between 13 - 25 stands (depending if it is classed in or out of town); the council's own supplementary guidance would require 25. If this is to be used for staff parking too, then there needs to be additional stands. The car parking provision is up to the maximum allowed under the parking standards. We would expect cycle parking provision to be likewise, given the high residential population in the vicinity and the likelihood that people may choose to cycle the short trip to the site.