

EPI/12/110 - Appendix A – River Don Corridor Framework: Public Consultation Comments, Responses and resulting Framework amendments

Ref	Comment summary	Response	Amendments to Framework
SEPA1	We would like to see additional reference in the guidance to the Water Framework Directive and the responsibilities this places on various bodies, including local authorities, through the Water Environment and Water Services (Scotland) Act 2003. Further guidance on this is given in our planning guidance – LUPS-GU17 Guidance on the Water Framework Directive including river basin planning available on our website.	Accepted	The Framework has been amended to include additional reference to this.
SEPA2	Reference should be made to the fact that River Basin Management Plans are a material planning consideration and therefore the planning system has a key role in implementing these measures through the location and design of developments.	There is existing reference to River Basin Management Plans in Aberdeen’s Local Development Plan (LDP) – section 1.13. This Draft Framework will be Supplementary Guidance to the LDP and as such seeks to complement it, not repeat what is in it.	The Framework has not been amended on the basis of this response.
SEPA3	Reference should also be made to the Water Environment (Controlled Activities) (Scotland) Regulations 2005 as amended (CAR) as important measures to address key pressures on the water environment of the River Don.	Accepted	The Framework has been amended to include additional reference to this.
SEPA4	In section 2.7 it is stated that "Below Dyce the channel is heavily modified". Given the Water Framework Directive connotations of this description (a Highly Modified Waterbody is a designation under the WFD), it would probably be best not to describe this section of the river as heavily modified to avoid confusion.	Accepted	This terminology in the Framework has been amended to avoid confusion with the Water Framework Directive terminology.
SEPA5	We would like to see a stronger emphasis in the document on the role that greenspace can play in the restoration of morphology (the condition of beds and banks) by creating space for channel restoration and improving riparian vegetation. This would link in to the Water Framework designation above.	Accepted	The Framework has been amended to include stronger emphasis on this.
SEPA6	We would also like to see reference to the role that greenspace can play in reducing diffuse pollution entering the water environment by functioning as 'green infrastructure' under sustainable urban drainage. Additional guidance on sustainable	Accepted	The Framework has been amended in the sustainable urban drainage section to

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	urban drainage is given in our planning guidance on our website (LUPS-GU2 Planning advice on Sustainable Drainage Systems (SUDS)).		include reference to the role of greenspace in reducing diffuse pollution.
SEPA7	We would also like to see reference to <u>aquatic</u> habitats in the biodiversity section.	There is already reference to aquatic habitats in the biodiversity section: “Estuarine & Intertidal Habitats, Wet and Riparian Woodland, River and Burns and Wetlands”	The Framework has not been amended on the basis of this response.
SEPA8	We would like to see a clearer summary of the guidance, including any proposals, including identification of opportunities for improvement of bed and banks, and clearer recommendations as to how the guidance and various proposals will be taken forward. For example, all planning applications within the River Don Corridor should be required to demonstrate how they contribute to the implementation of the Guidance.	Accepted, in part. Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence once the Framework has been approved.	The Framework has been amended by widening the introductory paragraphs to include a clearer outline of the document, including a statement of intent. The document now also includes clearer details regarding the mechanisms for ‘Implementation, monitoring & review’.
TurnGT1	On behalf of the Grandhome Trust who will be bringing forward LDP site 0P12 for development, we welcome and support the broad aspirations of the document.	Noted, with thanks	The Framework has not been amended on the basis of this response.
TurnGT2	Having undertaken a recent review of the Masterplan, we are developing a clear vision for our site based on known environmental constraints and assets. There are several points of detail in the document which relate to Grandhome, but pre-date our analysis. The document therefore clearly needs	This Framework sets some of the higher level Strategic Objectives (SO) that must be considered as part of any development along the River Don Corridor. These SO are supported with a series of graphics that	The Framework has not been amended on the basis of this response.

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	<p>updated to align with our Vision and I would suggest a meeting is arranged with the Council and SURF in order to align both processes.</p>	<p>present these in visual terms. These graphics are in themselves not prescriptive plans that are expected to be implemented in complete conformity. This point is especially pertinent within masterplan zones and sites. It is the role of Masterplans to align to and help deliver these SO, by setting out further details of the development principles at specific locations. It is considered unlikely that the SO in this Framework will conflict with the principles set out in a Masterplan for the Grandhome site, or any other masterplan along this Corridor.</p> <p>It should be noted that at this time no Masterplan has either been submitted or approved for the Grandhome site.</p>	
TurnGT3	<p>Greenspace Analysis, p23</p> <p>Although this Section suggests large parts of the City are distant from a Major City Park, this is typical for suburban locations. The analysis should refer to access to open countryside around Aberdeen. Although a different open space resource, it is important nonetheless. It is not possible to achieve equality of open space provision across the City, but different locations will have a different blend of open space provision. This point is quite separate from localised provision within housing areas and the Grandhome masterplan has sought to address this through the provision of large parks, wildlife corridors and incidental open space.</p>	<p>Matters related to open space provision associated with new developments are subject to the approved Open Space Audit Report and Open Space Supplementary Guidance documents. It is not the role of this Framework to divert from these approved Policies and Guidance. This Framework seeks to consider and present these in an integrated format.</p>	<p>The Framework has not been amended on the basis of this response.</p>
TurnGT4	<p>Open Space Typologies, p28</p> <p>The definitive network on this plan should be treated with caution as our own evidence base suggests the position and extent of the Green Space Network is largely arbitrary.</p> <p>Nonetheless, the masterplan has conformed with the intent, and has also sought to achieve a greater and more pervasive green network within the site.</p>	<p>Matters related to the Green Space Network (GSN) are subject to the Green Space Network Policy (NE1) as detailed in the approved Local Development Plan. The GSN Policy is not arbitrary but based on a very clear rationale. It is not the role of this Framework to divert from this Policy. This Framework seeks to consider and present</p>	<p>The Framework has not been amended on the basis of this response.</p>

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		existing Policies and Guidance in an integrated format.	
TurnGT5	<p>Strategic Objective 3, p42</p> <p>Whilst supportive of the desire to increase native woodland cover, regrettably, we must object to the plan shown in support. The plan shows aspirational woodland within the western edge of site OP12. Taken with the Green Space Network, the pylon corridor, contamination zones and other constraints, these aspirational designations do not account for the need to deliver housing within the allocated sites.</p> <p>We are seeking the removal of this designation and in its place a commitment to ensure that the landscape strategy for Grandhome will complement or reinforce existing tree cover in visual and biodiversity terms.</p>	<p>Accepted, in part – please refer to the amendment opposite.</p> <p>Please also refer to the Response to item Ref TurnGT2 above.</p>	<p>The Framework has been amended to slightly vary the graphic supporting Strategic Objective 3 (and all subsequent graphics presenting this principle). The aspirational woodland within the boundary of OP12 (Grandhome) has been moved outwith the Opportunity Site boundary. This amendment should be considered in light of the Response to item Ref TurnGT2, above.</p>
TurnGT6	<p>Strategic Objective 7, p51</p> <p>Strategic Objective 7 suggests the designation is essential to screen new development. We consider that the EIA and masterplanning processes are best place to assess and respond to this impact and that the document is making a presumption that visibility equates to harm.</p> <p>We would ask that the designation be removed and replaced with a statement that supports the principle of having regard to the relationship between new development and its impact on the Don Corridor.</p>	<p>Please refer to the Response to item Ref TurnGT2 above.</p> <p>In addition – Strategic Objective 7 neither states, nor intends to suggest, that screening is <i>the</i> solution to development along the River Don Corridor. SO7 seeks to reinforce the principle that appropriate development should occur within an appropriate landscape setting. Screening may or may not be one solution to address this issue at one time or location.</p>	<p>The Framework has not been amended on the basis of this response.</p>

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TurnGT7	<p>Strategic Objective 6, p49</p> <p>At this stage we are not proposing any pedestrian crossings of the Don in support of the masterplan. A Don Crossing will raise significant technical and environmental issues and should not be undertaken lightly, particularly if there is a desire to 'future-proof' these structures. The matter requires special consideration beyond the remit of the current document.</p> <p>Moreover, whilst the ability for pedestrians to cross the Don would be advantageous, at this stage we see no significant economic or social benefits that would justify the cost and diversion of resources away from other objectives in the document, or outweigh potential environmental harm. We respectfully ask that these aspirational links be removed from the plan.</p>	<p>Please refer to the Response to item Ref TurnGT2 above.</p> <p>In addition – It is not the role of this Framework to divert from existing Policies, Plans or Guidance. This Framework seeks to consider and present existing Policies and Guidance in an integrated format.</p> <p>Crossings over the River Don, including within the vicinity of the Grandhome masterplan site, are explicitly stated requirements within the following approved documents supporting the approved Local Development Plan:</p> <p>Infrastructure Requirements for Masterplan Zones 2010</p> <p>Development Framework, Former Davidson's Mill, Bucksburn 2011</p> <p>Stoneywood Estate Framework and Masterplan 2011</p> <p>Proposed Action Programme & Draft Action Programme 2012</p>	<p>The Framework has not been amended on the basis of this response.</p>
TurnGT8	<p>Item 5.2 - 5.4</p> <p>Regretfully, the Trust must object to the document allocating community nodes, strategic connections, paths and bridges on the Grandhome OPI2 site without regard for wider considerations. Whilst all of these concepts are welcome, the masterplan consultation process is the most appropriate mechanism for addressing these issues. We would ask that all such references are omitted and that the document focus on the Don Corridor only.</p>	<p>Please refer to the Response to item Ref TurnGT2 above.</p> <p>In addition – areas of the Grandhome opportunity site (OP12) fall very much within the indicative boundary for the River Don Corridor. As such, this River Don Corridor Framework would fail in its Objectives if it did not take into consideration the full extent of the Corridor, including this site.</p> <p>It is also a consistent with good planning principles to consider connectivity within a site and of that site with surrounding areas – one of which is Grandhome (OP12).</p>	<p>The Framework has not been amended on the basis of this response.</p>

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RDT	<p>The River Don Trust wishes to concentrate its comments on the lack of focus upon Invasive Non Native Species throughout the document.</p> <p><i>The River Don Trust is a charitable organisation established: To advance for public benefit environmental protection and improvement by conserving and enhancing the natural biodiversity associated with the freshwater environments of the River Don.</i></p> <p>The River Don Trust (RDT-Hereafter) is at the forefront of INNS surveying, monitoring, and control within the River Don catchment. The RDT prepared and produced a Bio security document consulted upon by various stakeholders including Aberdeen City Council and SURF Aberdeen. The document sets out key species for monitoring and control within the catchment, it outlines aims for monitoring, recording and controlling INNS and also established a timeline of actions over the period of 2011-2016.</p> <p>As a result of this document the RDT has developed and secured funding for several control programmes to control INN Plants such as Giant Hogweed, Japanese Knotweed and Himalayan Balsam all of which are known to be present within the River Don Corridor area.</p> <p>Therefore the RDT was surprised at the lack of suggested INNS monitoring, recording and control within the draft supplementary guidance.</p> <p>The RDT would wish to see that changes are made to SURF Aim B: Enhance the biodiversity value of the area, reinforcing and expanding habitat networks - to include a specific strategic objective to monitor record and control INNS plants within the corridor.</p> <p>At present the objective, Improve biodiversity loosely covers this topic but the RDT feels that this topic merits its own strategic objective.</p> <p>Ideally this objective would take into consideration any potential INNS control projects which could span, include or be focused within the River Don Corridor Project area, not</p>	<p>This Framework sets some of the higher level Strategic Objectives (SO) that must be considered as part of any development along the River Don Corridor.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence once the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	<p>The Framework has not been amended on the basis of this response.</p>

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	<p>withstanding ongoing projects.</p> <p>The RDT wishes that the objective also stipulates that control where possible is undertaken in a coordinated manner to allow for efficient use of resources and that existing stakeholders such as the RDT and City Council be a point of contact for future developments to illustrate current best practice.</p>		
RDT2	<p>The RDT would wish to see that documents such as the River Don Bio security Plan 2011-2016 also be identified as a reference source, (available at www.riverdon.org.uk)</p>	Accepted	<p>The Framework has been amended to include reference to the River Don Trust's Bio security Plan.</p>
PublicID1	<p>First of all, in general terms I am very happy at the idea of considering the Don corridor as a reserved green area and of facilitating access to it, particularly for non-motorised movement.</p>	Noted, with thanks	<p>The Framework has not been amended on the basis of this response.</p>
PublicID2	<p>My first concern is that the proposed 3rd River Don crossing receives barely a mention; this is a grave omission given that it now looks fairly certain that the bridge will be built. I was under the impression that the design of the bridge and of the approaches to it would include provision for foot and cycle traffic, in which case failure to consider it properly (i.e. by including the approaches to the bridge) it in the Supplementary Guidance document strikes me as odd, Even if it ends up as purely a vehicular bridge, there is bound to be an impact on pedestrian and cycle traffic, particularly in Tillydrone but also in Danestone.</p>	Noted	<p>The Framework has been amended to strengthen reference to the 3rd Don Crossing and to re-align the strategic connections in the locality of the Crossing.</p>
PublicID3	<p>I hope that it will have pedestrian and cycle access, preferably separate as there is considerable public hostility to shared cycle/pedestrian paths and at best it slows down cycle traffic which reduces the advantage of cycling over travelling by bus (I qualify for a bus pass so there is no cost advantage, the main advantages being speed and health benefits). I also hope that it will have entry and exit points for such access to meet existing</p>	<p>This Framework sets some of the higher level Strategic Objectives (SO) that must be considered as part of any development along the River Don Corridor.</p> <p>Detailed plans for river crossings, including the 3rd Don Crossing, are not the subject of</p>	<p>The Framework has not been amended on the basis of this response.</p>

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	paths and roads.	<p>this Framework.</p> <p>Detailed plans for the 3rd Don Crossing have been completed and approved. They can be viewed here: http://www.aberdeencity.gov.uk/transport_streets/roads_pavements/transport_projects/lap_accessnorth_home.asp</p>	
PublicID4	<p>I am also concerned that the main emphasis appears to be on movement along the banks of the river - much needed - but that other than providing additional crossings there seems to be no plan to facilitate movement across the river, particularly between where I live (Laurel View) and the south side of the river, a route on which I travel regularly on foot and by cycle to reach other parts of Aberdeen. The south side of Grandholm Bridge, which oddly is shown as a proposed access point, has no space for car parking and can be reached on foot or by cycle from the East and South only by the road from the foot of Don Street. The surface of this cobbled road was very badly remade when services were put in for Grandholm Village and it is virtually impossible to cycle downhill on the correct side of the road. Cars regularly drive on the other side of the road to avoid the extremely rough surface, causing a further safety hazard to pedestrians and cyclists travelling uphill. There is no pavement on this road, and the historic Jacob's Ladder stairs (not mentioned in the document) which used to provide safe pedestrian access to the bridge from above have been closed off for a number of years, no doubt on health and safety grounds.</p>	<p>This Framework sets some of the higher level Strategic Objectives (SO) that must be considered as part of any development along the River Don Corridor.</p> <p>It considers access to, along and across the River, as well as the strategic connections between the communities and facilities around the River Don Corridor.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence once the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	<p>The Framework has not been amended on the basis of this response.</p>
PublicID5	<p>It seems to me that the plan pays insufficient attention to who may cross the river, why they might do so and the locations of their start points and destinations. For example, I notice that many people travel to Tesco Extra from the south side of the river by the road which runs parallel to the mill lade on the north of the river. Just before the east end of the Tesco complex there is an underpass, which used to give convenient access to Tesco</p>	<p>Please refer to the Response to item PublicID4, above.</p>	<p>The Framework has not been amended on the basis of this response.</p>

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	<p>but which is now virtually useless because the direct route to up a stairway which once led to it from the mill lade road has been blocked by the developers of the Mill Lade Wynd houses and the alternative path which users trod out has been effectively blocked by deposits of waste from the older houses in the area.</p>		
PublicID6	<p>I am puzzled by your designation of the area around Tesco Extra and Bannatyne's as a 'Community Node'. Granted it has the only shops in Danestone and a private health club but that hardly qualifies it as a centre for the community. Access to the Tesco store from the West and from Bannatyne's is particularly difficult for non-motorised disabled people, cyclists and pedestrians because the main entrance is vehicular only with no pavement and the ramp and stairs entrance is at the other end of the very large building.</p>	<p>The use of the term Community Nodes in this Framework is a means to identify those areas that contain facilities of interest for communities: not necessarily those places that are the heart of communities. As places of interest, they are likely to generate a movement of people that is important to consider as part of the planning process.</p> <p>While the locality referred to only contains two individual facilities, these are significant enough to have an impact on the movement of people to / from the surrounding communities, and beyond.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence once the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	<p>The Framework has not been amended on the basis of this response.</p>
PublicID7	<p>There are several, existing paths which are not shown in your plans, in particular along the North side of the river running East from the North end of Grandholm bridge, and diagonally to the West of Grandholm Village to the present bridge (currently either being demolished or refurbished) over the Grandholm Mill Lade. This path is very muddy in wet weather but provides convenient pedestrian access to the no. 19 bus terminus across the pedestrian bridge downstream of Grandholm Bridge. I</p>	<p>This Framework does not seek to identify and mark all existing paths / networks in the Corridor – this would be unfeasible and would overcomplicate the plans.</p> <p>This Framework sets some of the higher level Strategic Objectives (SO) that must be considered as part of any development along</p>	<p>The Framework has not been amended on the basis of this response.</p>

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	<p>suggest that it should be specifically included in your plan, with a view to improving the surface.</p>	<p>the River Don Corridor.</p> <p>The focus of this aspect of the Framework is on identifying supporting delivery and management of key Core Paths — as designated by the Core Paths Plan.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence one the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	
PublicID8	<p>I applaud your desire to celebrate the industrial history of the area and I am particularly concerned that we should not lose the best preserved mill lade, on the North side of the river leading to Grandholm Village and the remaining Grandholm Mill buildings. This waterway is suffering from neglect but is still intact and is well worthy of being maintained properly. There are also vestiges of the mill lade on the opposite side of the river which are in a poorer state but which I feel should be refurbished before it is too late, as well as remains of another lade near Bannatyne's. The water wheel from Woodside Mills is currently in the National Museum of Scotland and it would be really good for it to be reinstated and made to work again, perhaps for a local electricity generation plant; I am sure that a modern water turbine or two could be incorporated sympathetically into schemes to refurbish one or both mill lades, or even into schemes to make use of the weirs on the river.</p>	<p>Noted, with thanks.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence one the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	<p>The Framework has not been amended on the basis of this response.</p>
PublicID9	<p>I also agree that interpretation is an important aspect as we have a superb resource for pupils in our local schools and visitors to experience our local history and ecology at first hand. Marked trails and waypoints, improved access and renewal of tired out woodland all form a major part of what needs to be</p>	<p>Noted, with thanks.</p>	<p>The Framework has not been amended on the basis of this response.</p>

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	done. I'm just an individual but would be very glad to help a community effort to move this on.		
PublicID10	<p>A community is what we are lacking (see my comment on the 'Community Node' marked on your plans as the immediate area where I live was never planned as a community, like the rest of the Bridge of Don postal area other than the area on the North of the river between the Brig of Balgownie and the Bridge of Don, which grew organically before the times when giant housing estates suddenly appeared without a thought to integration into the community or how the occupants would travel to work elsewhere.</p> <p>It appears to me that the community aspect needs to be tackled in more than one way: by the provision of real community hubs, where people meet for other purposes than weekly shopping or slogging on a treadmill; by creating and developing community organisations to bring people together; and by involving individuals in the area in shared projects which bring them together. I don't think that it is enough to rely on organisations which already exist though part of the policy ought to be to boost their membership and provide them with support to take the burden off a few hard pressed volunteers. I believe that consideration should be given to forming new organisations or task groups specifically aimed at involving people from the community, and providing council finance and support at least in the short term to ensure that they take off and become sustainable (if their purpose is not short term).</p>	<p>The planning of community nodes, including their specific locations, is outside of the scope of this Framework.</p> <p>This Framework does support strengthening of the physical and organisational connections that seek to link communities.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence once the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	The Framework has not been amended on the basis of this response.
PublicID11	I commend you for your efforts in producing this guidance and hope that my comments are of assistance in developing plans for improving the River Don Corridor.	Noted, with thanks	The Framework has not been amended on the basis of this response.
PublicCL1	The work around River Don corridor is excellent - such a wealth of history and wildlife easily accessible. The rubbish dumping is horrible. Suggest involve staff from local industry and shops to help protect this area.	<p>Noted, with thanks.</p> <p>This Framework sets some of the higher level Strategic Objectives (SO) that must be considered as part of any development along</p>	The Framework has not been amended on the basis of this response.

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		<p>the River Don Corridor.</p> <p>Specific opportunities for improvement and associated proposals and recommendations will be identified and considered as part of the development of the Implementation Plan for the Framework. Development of this Plan will commence once the Framework has been approved.</p> <p>These comments have been recorded and will be considered as part of the above process.</p>	