

16 Hopetoun Road
Bucksburn
Aberdeen
AB21 9QZ
29 January 2013

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

Persimmon Application OP20

Ref: 13/0029

Dear Sir

The Reporters to the Public enquiries said that the field known to planners as OP20 should be subject to no more than thirty houses and the fields beyond the lane known as 'Lover's Lane' should remain part of the Green Belt and this was agreed by Aberdeen City Council. Nothing has changed around the fields or the objections.

1. The road system - in particular, Hopetoun Grange, is more than congested in peak times (over 250 journeys per hour at morning rush hour). This would only be exacerbated by the addition of (estimated) 100+ cars from this site
2. The 57dB contour was shown by the 2011 Airport Noise Report to have retreated to the northeast corner of the field and is projected to return to cut off the northeast quadrant of the field by 2020. This review was carried out without noise meters being placed on site
3. The trees facing on to Hopetoun Grange are protected.

The recent tree survey condemning all the mature trees facing the field on Hopetoun Grange is suspect after the previous survey taken a couple of years ago found no reason to condemn them. Persimmon's plan to uproot the trees and replace them with new ones is NOT in the spirit of 'protection'. The houses would still have to be more than twenty metres from the tree line (and the Lover's Lane tree line). The proposed road ending at this second tree line pre-supposes that the road will be extended into the Green Belt fields and further trees will be lost.

Persimmon do not seem to have allocated enough space on site for cars.

The examples shown of housing types for the site are of brick and do not conform to the Materials used in the existing houses in the Hopetoun and Hopecroft estates

Yours Sincerely



Alastair Williamson

30 JAN 2013

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 04/02/2013 16:12
Subject: Planning Comment for 130029

Comment for Planning Application 130029

Name : Mrs Lorna Burnett
Address : 27 Hopecroft Drive
Bucksburn
Aberdeen
AB21 9RJ

Telephone : [REDACTED]
Email : [REDACTED]
type :

Comment : I wish to make you aware of the strong objections I have regards the proposed development to land North of Hopetoun Grange which is immediately adjacent to my property.

My specific objections are as follows -

I am particularly concerned about the close proximity of the SUDS which I believe could possible create unpleasant odours. If this is the case it would limit the enjoyment I get out of my back and side gardens, also as my property is nearest to this development you will appreciate my anxiety.

The boundary of the Hopecroft scheme and the land next to it is divided by a raised area bordered on each side by a dyke which at the time of purchase 48 years ago was half owned by the Rowett Institute and the residents but according to the plans the boundary line seems to be more in favour of the developer.

First plans issued showed no more than 30 houses to be built on this land and now the amount has more than doubled showing 65 houses which also threats for more congestion of traffic on Hopetoun Grange adding to the problems we already face trying to get out of Hopecroft Drive during the morning rush hour with cars exceeding the speed limit taking a short cut off Forrit Brae.

I would be very grateful if you would take my objections in to consideration.

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 29/01/2013 17:45
Subject: Planning Comment for 130029

Comment for Planning Application 130029

Name : Jacqueline Bell
Address : 45 Hopetoun Grange
Bucksburn
Aberdeen
AB219RE
Scotland

Telephone : [REDACTED]

Email : [REDACTED]
type :

Comment : Dear Sir/Madam I am writing to object to the proposal for 65 houses on the land North of Hopetoun Grange, Bucksburn, Aberdeen (application number 130029) My main objection to this development is the impact it will have on traffic in the area. The road which leads off of Forrit Brae is used as a short cut by many people already and even as early as 7am there can be a considerable number of commuters using this through fare. 65 homes may not sound a lot but with the potential for a minimum of 2 cars at each, many of whom I predict will be leaving at peak commuting times this is an additional number of vehicles which this area could well be done without.

On a second point I find it interesting to find what a poor condition the beech tree population is in. It seems highly convenient that it is being pursued as a recommendation that now they should be removed. If they are that unsafe it makes one wonder why nothing has been suggested prior to this application. We were lead to believe that if trees were removed there was an agreement they would be replaced. I hope the existing boundary is left in place to give room for the growth of new trees. Also it appears the trees which have been replanted to replace the culled trees have not grown infact most look dead. Will anyone be replacing these?

I will close my objection with a point of preference the site may be arable however it has it's own scenic beauty and personally I have witnessed a variety if animals, foxes, woodpeckers, owls, deer, bats, at the far side near the duel carriage way a pair of buzzards as well as more common birds-robins, blue tits, wood pigeons, blackbirds and sparrows. I hope that the adjoining hedge rows and trees are left as undisturbed as possible. I recently saw on a news item a council official commenting on the importance of maintaining hedgerows for the benefit of existing wildlife and protecting our local environment. Many people walk along the avenue up to Forrit Brae and enjoy this natural area. It would be extremely disappointing to loose this area all for the sake of commercial profit.

Your faithfully Jacqueline Bell

Mr Patrick Doris
21 Hopecroft Drive
Bucksburn
Aberdeen
AB21 9RJ

5th February, 2013

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

FAO Jane Forbes

Dear Madam,

Proposed development for 65 residential houses including infrastructure and landscaping – Reference Number 130029

With regard the above Planning Application I would like the following observations taken into consideration;

1. 65 Units is more than double the number of units that was approved by the Scottish Office in 2007, why should this be allowed?
2. The design of the proposed houses is incompatible with the existing houses in the surrounding area.
3. The extra traffic that this development brings will mean more delays on the already busy roads. There are already hold-ups exiting from Hopetoun Grange to Sclattie Park and on to the A96. Hopetoun Grange is also a rat run at peak times.
4. The local amenities will be further stretched. There is 1 General Store .1 Butcher and a Chip Shop locally
5. This area is already blighted by noise from the Airport, more so now that they have 24 hour opening. Traffic on the A96 has also increased considerably in recent years, as has the pollution.

I realise that development is inevitable but urge you to keep it at a sustainable level and consider my observations when making your decisions

Yours Faithfully



Patrick Doris

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 29/01/2013 20:09
Subject: Planning Comment for 130029

Comment for Planning Application 130029

Name : Kenneth Ross

Address : 130E Great Western Road, AB10 6QE

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : As the owner of a property at no. 25 Hopetoun Grange, AB21 9RD, I wish to submit comment on the planning application P130029. The proposed development of 65 residential units is on land, currently used for agricultural purposes, directly opposite my property. I strongly believe that Hopetoun Grange cannot sustain any extra traffic volume that such a development would create, as it is currently a cut-through used by commuters on the A96 via Forrit Brae. Further increases in traffic would undoubtedly have a detrimental impact on residents of the street and surrounding streets. Furthermore, the proposed access driveways from the development onto Hopetoun Grange would be likely to compound traffic issues and subsequently impact road safety. On a second point, removal of trees and other natural habitat from the site will have a negative impact on birds and wildlife. I believe that Aberdeen City Council should scrutinise thoroughly the suggestion made in tree reports - instructed by the applicant, regarding the life-span of the established beech trees which line Hopetoun Grange. In summary, I conclude that I am opposed to the application - my main objection being regarding traffic and natural environmental impact.

Regards, Kenneth Ross

3 Hopetoun Green, Bucksburn, Aberdeen, Scotland AB21 9QX

Planning Applications – representations.
Masterplanning, Design and Conservation Team,
Planning and Sustainable Development,
Enterprise, Planning and Infrastructure,
Aberdeen City Council,
Business Hub 4, Ground Floor North,
Marischal College,
Broad Street,
Aberdeen AB10 1AB

8th February 2013

Dear Sir/Madam,

**Incorrect copy of
Representation about Planning Application number 130029, OP20: Hopecroft
delivered previously**

Yesterday I delivered my Representation about the above Planning-Application by hand to Marischal College.

I have found an error in an important paragraph in it; under 'Issue 5' on page 9; I had written 'South' instead of 'North' about the position of a noise-contour in relation to the proposed new housing development.

Also, I found a page three after posting the Representation to you on 7th January; possibly the copy you already have lacks the original page three.

I should grateful therefore if you could please, if possible, discard all of the pages of text (pages 1 to 18) that I delivered to you on 7th January and use the enclosed complete and correct text (pages 1 to 18) that I now enclose. The Diagram and Photograph that you already have are correct. They should go with this enclosed replacement copy of the text.

I though that it would be simpler for you to replace the whole text (and covering letter) with the enclosed correct version and throw away all of the pages of the text that I delivered previously, rather than to look for individual pages.

Also on 7th January, I emailed my text, diagram and photo to PiPi@aberdeencity.gov.uk as three attachments. I have, today, emailed replacements for all three of those files, even though the error was in the text file only.

With many apologies for taking up your time further with these mistakes.

Yours faithfully,



Dr Richard Johnson

Enclosure: Replacement text (printed pages 1-18 plus a copy of the original covering letter).

replacement pages (all) RJ

From Dr Richard Johnson, 3 Hopetoun Green, Bucksburn, Aberdeen, Scotland AB21 9QX


Masterplanning, Design and Conservation Team,
Planning and Sustainable Development,
Enterprise, Planning and Infrastructure,
Aberdeen City Council,
Business Hub 4, Ground Floor North,
Marischal College,
Broad Street,
Aberdeen AB10 1AB

6th February 2013

Dear Sir/Madam,

**Representation about the Planning Application number 130029, OP20: Hopcroft,
to Aberdeen City Council (ACC) by Persimmon Homes.**

I should be grateful if you would consider my representation, enclosed, about this Planning Application.

A main concern has been, and is, that Site OP20 is too noisy to provide a satisfactory environment for new homes. I fear that the Council may sidestep that inconvenient truth, as previously, especially under current pressures to build new houses. The impact, assessment and control of aircraft and other noise-nuisance are obscured by technical details. This is a complicated issue. The details are important, including those that I have placed in Footnotes.

I am concerned that if the **Report on Road and Air Traffic Noise**, dated 30th October 2012, that is part of this Planning Application, is deemed inadequate, as I believe it is, then a replacement for it might be too late for public inspection and comment, as happened with the planning consent that Aberdeen City Council gave for this site in 2006. I provide an account of planning decisions for houses on this site in my Footnote (8).

I am concerned, also, that the **Transport Statement** by Fairhurst, dated January 2013, has not, so far as I could discover, been available with the other documents for this Planning Application on Aberdeen City Council's web site. I did not know that it was available until I found it attached to the other paper documents when I inspected them at Marischal College on 4th February.

Some of what I write here was included also in the 'View' that I submitted for the Planning Brief. I have summarised my Views on the Brief in my Footnote 9. Confusingly, there has been an almost simultaneous public consultation for the Planning Brief and the Planning Application (and its related Reports). The Brief was not Notified to Neighbours and was not associated with the Application on the Council's web site. I found the invitation to submit views on it by accident via Google, 22 items down in the Council's online News', a week after the consultation for the Brief had opened.

Yours faithfully,



Richard Johnson

Enclosures: Representation plus one aerial photograph and one diagram of noise measurements.

**PLANNING APPLICATION NUMBER 130029, OP20: HOPECROFT,
SUBMITTED TO ABERDEEN CITY COUNCIL (ACC) BY PERSIMMON HOMES, TO
BUILD 65 HOUSES THERE.**

Representation from
Dr Richard Johnson, 3 Hopetoun Green, Bucksburn, Aberdeen AB21 9QX
5th February 2013

Previous documents:

An EIA Screening opinion request, (P121578) 05/11/2012.

A **Design and Access Statement by Persimmon Homes**, dated December 2012, appears as part of the **Planning Application**. The first eight lines of **Section 5.1 of that Statement hold the key to the validity or otherwise of the Planning Application** (sections or section numbers of that Statement may be missing between 5.2 & 7.0 ?).

The **Planning Brief** was approved as an interim planning device by ACC's Development Management Sub-Committee on 06/12/2012; **Report number EPI/12/279**. That **Report** outlines the Brief. **Section 5.4 of the Policy Summary in that Report** states that '*The Reporters Report on the previous plan (i.e. ALDP 2008) highlighted two key site constraints which needed to be addressed, (1) existing trees and (2) the airport noise contour boundary.*' No discussion of the Brief was minuted.

I append in Footnote 9 a summary of the main Views, on the Brief, that I submitted to ACC.

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| 4. Attachments: (a) One Aerial Photograph to show Site OP20 in relation to Aberdeen Airport.
(b) One Diagram to compare the results of a previous noise assessment for OP20. | |

I provide a history of planning applications for OP20 Hopecroft in Footnote 8, Page 16.

I provide details of my own background in Footnote 10, Page 17.

The evidence to be evaluated contains much essential detail. I seek to make at least some that detail available to those who wish to examine the fine print.

1. OUTLINE SUMMARY OF ISSUES

Issue 1. THIRTY HOUSES ONLY WERE ORDAINED PREVIOUSLY FOR THIS SITE ON THE BASIS OF GOOD EVIDENCE:

Inquiry Reporters agreed, prior to ADLPs 2008 and 2012, that the part of the Site near the A96 is too noisy. They concluded that only 30 new houses should be built, at the South end of the site only, and kept well clear of the beech trees. If their conclusions are to be overridden, it is essential to do so on the basis of comprehensive, adequate and clear impact Assessments or Reports, previously available and adequately advertised to the Public for comment.

Issue 2. ACC's POLICY H8 (2012) AND THE POSITION OF THE 57 dB LAeq,16 AIRCRAFT NOISE-CONTOUR FOR EXCLUDING NEW HOUSES.

Policy H8 (2012) states that Applications for residential development under or in the vicinity of aircraft flight paths, where noise levels exceed 57 dB LAeq,16 will be refused. The Government maintains that 57 dB LAeq,16 marks the approximate '*onset of community annoyance*' but that people outside it may also be affected. Other Agencies set that level lower. Aberdeen International Airport Ltd's map of noise contours for 2006 ('actual') is unclear. A recent map, for 2011 ('actual'), shows the 57 dB contour to have retreated slightly so that it now 'clips' the North East corner of OP20.

Issue 3. ARE FLIGHT TRACKS OF HELICOPTERS OVER HOPECROFT INCLUDED IN NOISE CONTOURS FOR ABERDEEN AIRPORT?

The 57 dB LAeq,16 contour for 2011 shows large extensions Eastward that relate to helicopter flight paths, but not over Hopecroft. Does the Civil Aviation Authority include the numerous helicopter flight-tracks over Hopecroft in their maps of noise contours for Aberdeen?

Issue 4. THE 'REPORT ON ROAD AND AIR TRAFFIC NOISE' ATTACHED TO THE PLANNING APPLICATION.

The Report is inadequate. The Report was made for the layout of Site OP20 shown in the Brief. The layout is different in the Planning Application. The Report extrapolates about three hours of measured road-noise to cover 18 hours and also night-time noise. It does not measure any other noise at the Site. It relies on the aircraft noise-contour map for 2006.

Issue 5. AIRCRAFT NOISE IS PREDICTED TO INCREASE OVER OP20 HOPECROFT.

Maps of aircraft-noise contours for 2020 and 2040 in Aberdeen Airport International Ltd's **Airport Draft Master Plan 2013 (final version)**, drawings 2 & 3, show that aircraft noise is predicted to increase over Site OP20 Hopecroft and will cover almost a third of its area by 2040.

Issue 6. HOW LOW DO HELICOPTERS FLY OVER OP20 HOPECROFT?:

The true number flight tracks and impact of these low over-flights has been underestimated previously by the Council, and possibly in the Airport's maps of noise contours. They were not shown on a map of helicopter flight paths referred to by planning officers.

Issue 7. NOISE FROM GROUND RUNNING AT THE AIRPORT.

Noise from ground running is often intrusive at Hopecroft. It is not included in Aberdeen International Airport's noise contours.

Issue 8. 'NOISE 'MITIGATION'.

The **Report on Road and Air Traffic Noise** misses the point that 57 dB LAeq,16 applies to the outside of houses. People expect reasonable tranquillity in streets and gardens. They like to open their windows. Double glazing does not necessarily reduce annoyance.

Issue 9. ABERDEEN CITY COUNCIL'S PLANS TO BUILD NEW HOUSES WHERE THEY WOULD BE OVER-FLOWN BY LOW-FLYING AIRCRAFT ARE OUT OF ALIGNMENT WITH THE CAA'S RULES OF THE AIR.

If aircraft are not supposed to fly within 1000 feet of 'congested areas' then new congested areas should not be built within 1000 feet of where many aircraft must fly.

Issue 10. ROAD TRAFFIC ON HOPETOUN GRANGE.

Hopetoun Grange is narrow. It carries 200 or more cars in the rush hour already. The **Transport Statement** attached to the paper version of the Application concludes that '*the development can be accommodated on the proposed site.*' It appears to ignore lack of parking space, 200 cars per hour in the early morning and congestion at the East end of Hopetoun Grange. The **Transport Statement** was not available on-line.

Issue 11. THE STYLE OF HOUSES.

Some of the proposed houses are to have brick facings. They are not in keeping with the style of nearby houses at Hopcroft. Houses like them can be seen from the railway all the way down to London.

Issue 12. AIR QUALITY. Have planning officers considered air quality at Site OP20 and nearby areas, including measurements of nitrogen compounds and particulates (Nox, NO₂, PM₁₀, PM_{2.5} etc)?

Issue 13. THE LINES OF BEECH TREES ROUND THE SITE.

Why does Persimmon Homes' tree survey condemn so many trees for immediate removal although a survey was done in March 2009 and tree surgeons inspected and treated the trees then? 15 metres is not far enough to separate the houses from the trees.

Issue 14. SPECIAL PLEADING?

Are the financial gains of the applicants and/or their co-applicants to be accepted as valid reasons for granting planning permission?

2. ISSUES IN DETAIL (Footnotes follow on page 13 to 18)

Issue 1. THIRTY HOUSES ONLY WERE ORDAINED FOR THIS SITE ON THE BASIS OF GOOD EVIDENCE:

Site OP20 consists of one field. It was previously part of OP1 that contained three other fields also, now designated as greenbelt. Development of new houses on OP20 was discussed during two recent Public Inquiries prior to Aberdeen Local Development Plans ALDP 2008 and ALDP 2012.

Persimmon Homes' Planning Application requires a departure from conclusions that Aberdeen City Council accepted following Public Inquiries ALDP 2008 and ALDP 2012. The main reasons for the Reporter's decisions are still valid:

The Reporters for the first Inquiry (held in 2006) decided, for well-researched reasons, that no more than 30 houses should be built on Site OP20. The 30 houses were to be restricted to the south end of the Site because that is less noisy than other parts of it. They were to be kept well away from the beech trees there, which are under a Preservation Order. The Reporter for the more recent inquiry, prior to ALDP 2012, continued that decision.

The 'Officer Response' in **Appendix 1: Officer Evaluation and Recommendation** regarding the Issues received to the Proposed Modifications to the Finalised Aberdeen Local Plan (published for Issue on 18 January 2008) PM No. 52.01 Issue Ref: 79.01, page 24 was:

'In order to avoid the part of the [Hopecroft] site close to the dB 60 contour where the noise environment is unsatisfactory, development should be restricted to the southern, less noisy part of the site following a Noise Impact Assessment to be considered in conjunction with any planning application on the site.'*

*[Note: The Council's limiting aircraft-noise contour prior to Policy H8 (2012) was the 60 dB contour; it was changed to 57dB in ALDP 2012 at the insistence of the Inquiry Reporter; see Footnote (2). Policy H8 is the only development plan policy relating to noise issues.]

Following the Officer's Response to the Reporters' analysis after the Public Inquiry prior to ALDP 2012, the Reporter's *Conclusions* about OP20 were:

'OP20: (6). This site is allocated for housing in the adopted local plan and on the evidence before me I do not consider that circumstances have changed since its previous allocation. I acknowledge the concerns expressed about traffic issues, aircraft noise, affordable housing, the design of any future housing and existing trees, wildlife and pedestrian links. However there are in my view adequate safeguards contained within the natural environment, design, housing, transport and other policies proposed in the local development plan, to ensure that these concerns can be adequately addressed at the planning application stage. I therefore do not propose any amendment to the existing allocation. (See also issue 112 – Housing and Aberdeen airport).'

The Reporter's '*adequate safeguards*' depend on reliable and adequate Environmental Reports and Impact Assessments. Planners have stated repeatedly that the issue of noise is '*best addressed*' by a Noise Assessment. It will not be satisfactory if the Reporter's decision is lost through uncritical acceptance of an inadequate noise assessment, or in a fog of references to ALDPs, or Structure Plans, or other Plans that are not based on detailed site-specific evidence. Noise, or other assessments should be available to the Public for comment before they lead to planning decisions.

In their Design and Access Statement (5.2. Site Context & Density) dated December 2012, Persimmon Homes say that

*'Initial discussions were held with Aberdeen City Council (ACC) during 2012 to discuss the potential of increasing the allocation from 30 homes by addressing the concerns previously raised relating to existing landscape elements and noise issues. These have now been addressed** through a Tree Report (Donald Roger Associates) & a report on Air Traffic and Road Noise (Charlie Fleming Associates)'*

**[Those concerns may have been 'addressed' but they have not been resolved; see Issues 4 & 13.]

The **Report on Road and Air Traffic Noise**, submitted with the Planning Application, is unsatisfactory. I provide reasons why that is so in Issue 4 below.

Issue 2. ACC's POLICY H8 (2012) AND THE POSITION OF THE 57 dB LAeq,16 AIRCRAFT NOISE-CONTOUR FOR EXCLUDING NEW HOUSES:

Policy H8 (2012) states that new houses should not be built within the Airport's 57 dB LAeq,16 aircraft-noise contour; see Footnote (2). The '16' denotes the hours between 07.00 and 23.00 hours over which the noise is averaged and thus does not include noise at night. Note that the Government defines the 57 dB LAeq,16 contour, controversially, to indicate a '*level of community annoyance*'. It has been criticised because it takes insufficient account of individual flights. LAeq,(hrs) is a physical measure but is used to match the annoyance responses of people round Heathrow and other places. LAeq,(hrs) is used to describe the '*noise climate*' round an airport.

Aberdeen Airport's noise contours recognise aircraft noise only. They do not include noise from ground running (see **Issue 7**) nor from roads. Also, as described above, the noise-nuisance 'metric' LAeq,**16** does not include the noise of night flights (23.00 to 07.00).

Also, LAeq,16 'A-weights' noise to bring the measurements into line with the characteristics of human hearing; A-weighting discounts frequencies below about 200 Hz and thus neglects the low frequency vibrations and impulsive banging noises that make helicopters so annoying for many people. Also, dB LAeq,16 doesn't represent over-flights by individual aircraft or any other brief but annoying 'noise events' effectively because it averages noise over 16 hours.

Note that, in **Aircraft Noise Model Validation – How Accurate Do We Need To Be?**; Jopson, I., Rhodes, D. & Havelok, P., UK Civil Aviation Authority, comment that:

'As noise modeling outputs are often used as a tool to aid airport policy formation - - - it is vital that they accurately represent the local situation. Inaccuracies in the modeling process can lead to policy being set incorrectly and a mismatch between the expectations of local communities and actual experience.'

Page xvii in 'Aviation Policy for the UK' states that:

'When there is a reasonable possibility that public health will be endangered, even though scientific proof may be lacking, action should be taken to protect the public health, without awaiting the full scientific proof.' See Footnote (6).

I describe the derivation and use of aircraft-noise contours more fully in Footnote (3).

Maps of aircraft noise contours for OP20 Hopecroft are not all clear:

Persimmon Homes' Planning Brief states that *'Due to the coarse grained nature of the mapping available which identifies the Aberdeen Airport 57dB Leq Noise Contour, it has only been possible to plot an approximate line on the development principles diagram.'* The position of that contour is labelled as 'Approximate' in the Planning Brief, but the word 'Approximate' is omitted in their Planning Application.

Planning officers, Persimmon Homes and the author of the **Report on Noise from Road and Air Traffic** appear to have relied on the indistinct map of noise contours for 2006 ('actual') that appears in **Aberdeen Airport Noise Action Plan 2008-2013**. ACC planning officers have said, mistakenly for the 2006 map, that the 57 dB contour 'clips' the North East corner of Site OP20. In fact, it 'clips' the corner of the next field Westward. Perhaps they will consider other, more clear and more up-to-date maps, including the recently produced map of aircraft-noise contours for 2011 ('actual'); see below on this page and Footnote (3).

My interpretation of the unclear map for 2006 (by superimposing a clearer semi-transparent map over it) is that the 57 dB LAeq,16 contour (2006 'actual') cuts across Site OP20 further South and encloses part of the Site. I sent my reasons for that interpretation to ACC planning officers on 16/12/12. My conclusion was subsequently confirmed when Aberdeen International Airport Ltd emailed me a clearer map (.pdf) for 2006 ('actual'), on 22/01/2013.

Also on 22/01/2013, Aberdeen International Airport Ltd sent me a map of noise contours for 2011 ('actual'). The 57 dB contour has retreated slightly Eastwards to 'clip' the N. East corner of OP20, as interpreted mistakenly for 2006 ('actual').

The, recently issued, **Aberdeen International Airport Draft Master Plan 2013 (final version, Diagram 1)** still presents the indistinct contour-map for 2006 ('actual');

<http://www.aberdeenaairport.com/about-us/master-plan>

However, Aircraft noise at Hopecroft is expected to increase again with the planned growth of Aberdeen Airport: Aberdeen International Airport Ltd's maps of noise contours predicted for 2020 and 2040 show that in future the 57 dB contour will move Westwards again at Site OP20; see **Issue 5** below.

Issue 3. ARE FLIGHT TRACKS OF HELICOPTERS OVER HOPECROFT INCLUDED IN NOISE CONTOURS FOR ABERDEEN AIRPORT?

Did the Civil Aviation Authority (CAA) and Aberdeen Airport Ltd include the many flight tracks of helicopters over OP20 Hopecroft when they computed the noise contours for Aberdeen Airport? Compare the 57 dB contour for Aberdeen Airport 2006 ('actual') with that for 2011 ('actual'): The 57 dB LAeq,16 noise-contour for 2011 ('actual') shows large extensions Eastwards that coincide with helicopter flight-paths there. Conversely, the 57 dB contour for 2011 over Site OP20 Hopecroft has moved slightly inwards from its position given for 2006; it shows little or no outwards bulge to indicate the frequent flights of helicopters low over Hopecroft.

I have asked the CAA and Aberdeen Airport Ltd about that apparent lack and discrepancy, but have had no answer yet (Footnotes 4 & 5); Perhaps the Council should look into it? In what way are these frequent flights over Hopecroft recognised in the maps of noise contours?

Issue 4. THE 'REPORT ON ROAD AND AIR TRAFFIC NOISE' ATTACHED TO THE PLANNING APPLICATION:

The Northern boundary of Site OP20 overlooks the main A96 Road to Inverness that also carries traffic to the Airport and nearby Industrial Estates. The Site is next to a much used lay-by and a stretch of road where traffic accelerates away from the 40 mph speed limit. Traffic noise provides a constant background at Site OP20 and beyond the Hopetoun Grange end of it.

Also, Site OP20 is only about 1000 metres away from the South end of Aberdeen Airport's main runway and 400 metres away from the line of the main flight path (see the attached photograph).

Site OP20 is frequently over-flown, at around 500 feet, by helicopters approaching or departing from the airport. Sometimes they circle round the airport repeatedly while training. **The Report on Road and Air Traffic Noise**, submitted with the Planning Application, considers noise from road and air traffic separately (except in its paragraph 7.5 where it attempts to combine them). It is well written and arranged. It contains welcome advice on soundproofing houses and has a good Appendix on the Basic Principles of Acoustics, but the issue of noise At OP20 Hopecroft is not 'best addressed' in it. The Report is inadequate for the following reasons; A(1) to A(7) & B(8) to B(10):

A. Measurement, in the Report, of Road Traffic Noise from the A96 main road

(1). **The Site layout in the Planning Brief differs from the Site layout in the Planning Application.** Figure 2 in the Report ('Location of Measurement Position') refers to a site-layout that was proposed in the Planning Brief. A different layout is proposed in the Planning Application (e.g., compare the *Foundation Zoning Plan* in the Application with *Plan 6. Development principles diagram* on page 17 in the Brief.).

(2). **The position of the (single) microphone** was chosen to be at the elevation of the house that would be nearest to the A96 as shown in the Planning Brief; i.e., the elevation of the house that was then expected to be exposed to the most noise. But, the microphone was not in the right place for the Planning Application because that shows some of the houses in a different position, closer to the A96 and lay-by.

The use of only one measurement position does not provide convincing information about the road-traffic (and other) noise that is prevalent in other places round the Site; compare with the attached Diagram. The Planning Brief refers to the slope of the site and 'extensive views' from it. Line of sight means line of hearing also.

For comparison, my Diagram is of actual noise measurements of road and aircraft noise combined, as recorded for a previous noise-assessment for OP20 in January 2006, at two positions on Site OP20, over one arbitrarily chosen day and night of about 24 hours (see microphone sites 3 & 4 in the Diagram). As you may see, the noise levels in on that day in 2006, measured at positions near both

ends of the Site, were between about 57 and 63 dB LAeq,16. Parts of the night-time period, between 05:00 and 07:00 were also over 57 dB LAeq,hrs (night-time noise is not included in LAeq,16).

A diagram of real measurements like those would have been informative, if done for the present **Report on Road and Air Traffic Noise**, even if only done for an arbitrarily chosen period of 24 hours.

(3) **Noise was calculated rather than measured:** The **Report on Road and Air Traffic Noise** states that *'The daytime levels can be calculated very accurately based on measurements of the noise made over three consecutive one-hour periods'*. It considers noise that was measured for a period of only three hours [or three and a half hours? – see paragraph B(4) below] on one day only, between about 10.00am and 13.30 am (11/10/2012): **Thus, the Report does not include real measurements of noise at Site OP20 at other times of day or night; e.g., in the rush hours.** The Report invokes a mathematical formula and a *'measurement technique'* to extrapolate those three hours of measurements so as to cover a period of 18 hours, as described in paragraphs 43 and 44 of the Department of Transport's document *'Calculation of Road Traffic Noise'*, HMSO 1988.

According to the Report (Paragraph 1.4), *'This technique has been used before in Aberdeen, the results accepted by its council's officers, and so it has been used in this case'*. That *'technique'* relies on mathematical short cuts and fudge-factors applied to noise levels extrapolated from other roads in other places where the circumstances may have been different, possibly 25 years ago. The results are not site-specific and are not adequate. Noise measurements are needed over reasonably convincing periods of time and for days known to be typical for noise.

(4) **The Report does not address individual noise events.**

(5) **Discrepancy in Table 1 of the Report.** If you examine Table 1 on page 8 of the Report, you may notice that the lengths of time between the *Start of Measurement* and *End of Measurement*, given in the first two columns for each of the three time periods, are longer than the *'Duration of measurement'* given in the third column. The first two columns in the Table say that the overall measurement time was almost three and a half hours, not three hours as stated in the third column. It is not clear what effect that discrepancy may have had on the noise levels if they were averaged over three and a half hours. If a noise is averaged for longer than it lasts it will appear less. Table 1 contains the only measurements of road noise shown in the Report.

(6) **The Report calculates a sound level for road-traffic noise at night, apparently without having measured it:** Paragraph 4.5 says that

'At night, the external noise level, $L_{Aeq}(23.00 \text{ hrs to } 07.00 \text{ hrs})$, will be around 52dB(A)⁵'.

Reference ⁵ is to **Highways Agency, Design Manual for Roads and Bridges: Volume 11 Environmental Assessment, Section 3, Part 7, paragraph 3.7.** Paragraph 3.7 in reference 5, appears on page 3/1. It is not about night-time noise: It says:

'3.7 Where sensitive receptors are identified during the Scoping Assessment at which exceeding the threshold values for noise or vibration are possible at such an early stage, it may be appropriate to move directly to a Detailed Assessment. However, caution should be applied to such an approach as at the Scoping Assessment sufficient data may not always be available to make this decision. Before such an approach is adopted, the Overseeing Organisation should be consulted.'

(7) **The Report does not mention the noise from ground running at the Airport (see Issue 7).**

B. Measurement, in the Report, of Noise from Air Traffic

(8) **The Report does not mention that Site OP20 is overflown frequently by helicopters,** sometimes at heights around 500 feet. Nor does it consider that helicopter noise contains low frequencies and impulses that are discounted by the *'A-weighting'* and averaging that are applied in

the noise 'metrics' LAeq and Lden. The 'noise climate' round Hopecroft is unusual because Aberdeen Airport contains the largest Heliport in Europe.

(9) **The Report does not include any measurements of aircraft noise.** They were edited out of the periods of noise that were recorded, to leave road traffic noise only. Instead, the Report relies on the position of the 57 dB LAeq,16 aircraft noise-contour that is specified in ACC's Policy H8 (2012) as a limit for new housing. It determines the position of that contour over Site OP20 by referring to the indistinct version of a map of noise contours for 2006 ('actual') shown in **Aberdeen Airport Noise Action Plan 2008-2012**. The Report reproduces that map as its Figure 4.

Possibly, the Report misinterprets the position of the 2006 ('actual') 57 dB contour in its Figure 4 (see Issue 2).

However, paragraph 6.2 of the Report states that '

*What figure 2 shows is that most of the land [see ** below] on which it is proposed to build the houses is outside the 57 dB(A) contour. This can be taken as an indication that noise will not disturb the residents of the houses.*

That figure 2 is a map of the site layout as proposed in the Planning Brief, but not as proposed in the Application.

[**] 'Most of the land'? But how close would any proposed houses to the 57dB contour be? ACC's Policy H8 says that '*Applications for residential development under or in the vicinity of aircraft flight paths, where the noise levels are in excess of 57 dB LAeq - - - - will be refused, due to the inability to create an appropriate level of residential amenity - - -*'. '57 dB LAeq,16' is used currently to represent the '*onset of annoyance in the community*'. That is not necessarily the same as the disturbance of individual residents; see the Government's recent caveats quoted in Footnote (6).

Paragraph 6.2 of the Report continues '*The most exposed part of the development is subject to 58 dB(A). This is the daytime LAeq(07.00hrs to 23.00 hrs)*'. It is not clear to me how that 58 dB(A) was obtained.

Although the measurements were for three hours only (or three and a half?), the Report states confidently (paragraph 7.5) that '*- - - the road traffic noise level during the day was 62 dB(A), with that of the air traffic being 58 dB(A). The total of these noise levels is 64dB(A), 2dB(A) greater than the traffic noise on its own. This does not change the level of significance.*' However, that does put the calculated total noise level above 57 dB!

(10) **The Report discusses various methods for sound-proofing the proposed houses.**

Soundproofing is a good thing, especially at night, but the Report appears to miss the point that the 57 dB LAeq,16 contour applies to sound out of doors (See Issue 8 'Mitigation'). People should be able to enjoy reasonably tranquil conditions in their gardens and in areas round their houses – as pointed out by the World Health Organisation amongst others. See Issue 8, Noise Mitigation.

My conclusions about this Report on Road and Air Traffic Noise:

I think that, either this Planning Application should be denied, or a more comprehensive and reliable Noise Report should be obtained with more real measurements and more awareness that 'absence of evidence is not evidence of absence' (e.g., see Paragraph 5.13, paragraph 2 of the Report). The inadequacies and omissions that I have listed above should be 'addressed'. If a further Noise Report is obtained, it should be advertised to the public for inspection and comment before a decision is made about planning permission.

ACC should decide whether it is to consider aircraft noise contours and other noise separately, or added together. Should dB of road noise be added to the 57 dB noise contour of Policy H8? ACC should also consider whether it wants draw conclusions from real measurements or synthesised data.

Issue 5. AIRCRAFT NOISE IS PREDICTED TO INCREASE OVER OP20 HOPECROFT:

Recently, Aberdeen International Airport Ltd has obtained newly computed contours, for 2011 ('actual') from the CAA. They kindly emailed a map of them to me on 22/01/13. I called the attention of planning officers to it. That latest 57 dB contour does 'cut' the North East corner of Site OP20; (see Issue 2).

Maps in Aberdeen International Airport Draft Master Plan 2013 (final version), Diagrams 2 & 3, show that aircraft noise is predicted to increase over Site OP20 Hopecroft with an increase in passenger numbers of about 1 million between 2020 and 2040. The noise maps show (clearly) that the contours predicted for 2020 and 2040 will move out Westward over Site OP20 Hopecroft.

If you look at those maps, for 2020 and 2040, you will see that the 57 dB LAeq,16 noise contour of Policy H8 is set to move out again, Westwards, to cut across Site OP20 in 2020. It will enclose a substantial portion of the East side of the Site by 2040 and part of the Site at its North Western corner.

An expert at Aberdeen International Airport has told me recently that those two sets of noise contours, for 2020 and 2040, were computed at the same time as the new contour map for 2011 ('actual'). In other words, those maps are the latest predictions for aircraft noise at OP20: Aircraft noise at OP20 Hopecroft is predicted to increase as a result of the expansion planned for the Airport, not reduce.

Issue 6. HOW LOW DO HELICOPTERS FLY OVER OP20 HOPECROFT?:

The Site is only about 1000 metres from the south end of the Airport's main runway and about 400 metres from the main southern flight path.

How low do helicopters fly over Hopecroft?

The Airfield Manager wrote, in a letter to me of 2nd March 2005:

'I note your comments that you live approximately 1 mile from the end of the runway. Any aircraft flying an instrument or visual approach will be approximately 300 feet altitude at that point. This 300 feet altitude is in reference the ground level of the airfield therefore given that Bucksburn is on higher ground than the airfield the clearance height over Bucksburn is less'.

Similarly, in a letter to me dated 02/08/2006, the Airfield Manager wrote

'I have again consulted with Air Traffic Control and would advise that the 500-700 feet you estimate helicopters to be flying at is rather high in your locality. We expect helicopters to be circa 400 feet when correctly aligned to the 3° glide slope which they follow when making an approach to the southern runway. Any helicopters passing your house are operating as part of the scheduled services to the North Sea or those which have been on their training routine returning from the Loch of Skene area. As stated in previous correspondence Air Traffic control have the ability to monitor the altitude of each aircraft as they come and go from Aberdeen therefore we can confidently state that any helicopters passing over your residence are at the correct altitude for making an approach or departure. - - - it is common practice for helicopters to join from left or right of the centreline at a point one to two miles from touch down..'

More recently (14/11/2012), the Airside Delivery Manager at the Airport wrote

'Air Traffic Control have confirmed that the Bristow helicopter over your house was at the 500ft min. above ground level height.'

The true number and impact of these over-flights has been underestimated previously by the Council (and perhaps in Aberdeen Airport's maps of noise contours also (see Issues 2 & 3). They were not shown on a map of helicopter flight paths referred to previously by planning officers; Footnote (6).

No houses should be built on site OP20: It is not only subject to the noise of aircraft arriving and

departing at the south end of the main runway, but also to the noise of helicopters arriving and departing from Aberdeen Airport that fly over it frequently and often low; i.e., at 500 feet or less.

Issue 7. NOISE FROM GROUND RUNNING AT THE AIRPORT:

Site OP20 and other areas round the airport are subject to noise from the ground running of helicopters (mainly low frequency noise from their rotors) and fixed-wing aircraft (often turbo-props). It often lasts for periods of over an hour. Noise from ground-running is intrusive all round the Airport. Aberdeen Airport Ltd confirmed to me that it is not included in the maps of noise-contours, used by Aberdeen City Council in relation to Policy H8 2012; Footnote (7).

I have been assured, in a letter from a planning officer (11/12/12) that *'Environmental Health is aware of the intrusive nature of the noise generated by the ground running of aircraft engines and helicopters.'* A survey has been commissioned by 'BAA'[?]. *'Officers will be meeting with representatives from BAA later this month to discuss the survey report and actions that may be available.'*

Issue 8. NOISE 'MITIGATION'.

Report on Road and Air Traffic Noise appears to miss the point that the limit of 57 dB LAeq,16 set by Policy H8 applies to noise levels 'in gardens and patios' and, presumably, in streets.

Paragraph 5.12 of the **Report** suggests that *'- - - it is also borne in mind that there are not many days in the year when it is necessary to open windows to cool down properties in Scotland'*. There are probably many people in Scotland who like to open their windows, whether it is necessary or not. Paragraph 4.8 says *'- - the control of noise outside them (the proposed flats) is not important'*.

'Aircraft noise annoyance/exposure is measured in the summer time, when people tend to have their windows open'. (Peter Brooker, **The UK Aircraft Noise Index Study: 20 Years On'**; Proceedings of the Institute of Acoustics, Vol 26. Pt.2. 2004).

Double Glazing: Social surveys suggested that double-glazing did not have a significant effect on the extent to which people were annoyed by aircraft noise (see **CAA DORA Report 9023, The use of Leq as an aircraft noise index, 2.4.5, page 1**):

'In none of the analyses did the incorporation of this variable (i.e. double glazing) lead to a significantly higher correlation with the disturbance data - the only confounding factor which did so was airport-related employment. The reasons why double glazing had such a little effect are not clear.'

Possibly because people like to sit in their gardens, talk in the streets and live in a tranquil area?

Issue 9. ABERDEEN CITY COUNCIL'S PLANS TO BUILD NEW HOUSES WHERE THEY WOULD BE OVER-FLOWN BY LOW-FLYING AIRCRAFT ARE OUT OF ALIGNMENT WITH THE CAA'S RULES OF THE AIR:

According to the Director of Airspace Policy Environmental Information Sheet No.2 (CAA); see http://www.caa.co.uk/docs/7/EIS_02.pdf

'Aircraft, including helicopters are not permitted to fly over a congested area of a city, town or settlement below a height of 1000 feet above the highest fixed obstacle within a horizontal radius of 600 metres of the aircraft or below such height as would enable it, in the event of a power unit failure, to make an emergency landing without causing danger to persons or property on the surface.'

Away from congested areas, aircraft, including helicopters, are not permitted to fly closer than 500 feet to any person, vessel, vehicle or structure (Note: this is a minimum distance, not a minimum height: the distance of 500 feet is measurable in any direction, not just the vertical).

Accordingly, I made the following suggestion (updated here) in my submissions to the Inquiries prior to Local Plans 2008 and 2012:

“The legal requirement for height does not apply close to airports, but if ‘ - - - Aircraft, including helicopters are not permitted to fly over a congested area of a city, town or settlement below a height of 1000 feet above the highest fixed obstacle within a horizontal radius of 600 metres [1968 feet] of the aircraft - - - ’, then Aberdeen City Council will be irresponsible if it allows new residential developments to be built where the more general height requirement of 1000 feet cannot be maintained.”

Site OP20 is only about 1000 metres (about 3300 feet) from the south end of the Airport’s main runway and about 400 metres (about 1300 feet) from the line of the main Southern flight path (see the attached photograph).

If aircraft are not supposed to fly within 1000 feet (or 500 feet?) of ‘congested areas’ then new congested areas should not be built within 1000 feet of where many aircraft must fly.

I emphasised that proposal in an additional submission, about BAA’s **Aberdeen Airport Noise Action Plan 2008-2013**, that the Reporters asked for in relation to ALDP 2012. Neither the Reporters nor Aberdeen City Council’s Responding Officer mentioned or commented on my suggestion in their written responses. A planning officer has said (03/11/12) that I might promote that idea for a change of policy in a forthcoming review of the ALDP this year.

If that suggestion is unreasonable, I should like to know why.

Issue 10. ROAD TRAFFIC ON HOPETOUN GRANGE:

The Planning Brief mentions a ‘**Transport Impact Assessment (TIA)**’. I could not find that or anything else about road traffic in relation to the Site in the online documents for the Planning Assessment or Brief except a small paragraph ‘5.3.4 Existing Street Network’, on page 15 of the Brief. So far as I can discover, the **Transport Statement by Fairhurst**, dated January 2013, has not been placed with the other documents for this Planning Application on Aberdeen City Council’s web site. I did not know that it was available until I found it attached to the other paper documents when I inspected them at Marischal College on 4th February.

Hopetoun Grange is narrow and has ‘20 is Plenty’ traffic calming (widely ignored). It is the primary distribution road for Hopetoun and Hopcroft. It serves about 300 houses already. It is also a ‘rat run’ for cars from the direction of Forrit Brae. Recently a neighbour counted more than 200 vehicles per hour on Hopetoun Grange in the early morning (similar to the numbers he counted in 2005). Traffic backs up at the East end of the road. There it conflicts with other traffic trying to enter the 4-Mile roundabout and cars or pedestrians entering or leaving the small car park in front of the shops there. The 65 new houses would probably add about 100 more cars, one way or the other.

Vehicles from the four new shared house-entrances and the new road that are proposed to open onto Hopetoun Grange from the proposed development would meet traffic already on it.

Also, the ‘hammer-head’ parking arrangements shown in front of those new houses are clearly inadequate for the numbers of vehicles that might need to use them, some of which might not fit into the garages provided. Already, moving vehicles and parked cars are in conflict or block lines of sight on Hopetoun Grange and neighbouring streets.

The Transport Statement by Fairhurst concludes that '*Hopetoun Grange provides good access from both east and west.*' And that '*--- the development can be accommodated on the proposed site with no detrimental impact on the existing transportation network.*'

My Conclusion about the road traffic:

A more evidence-based Road Traffic report is needed before the Planning Application goes further. It should be advertised for the public to see and to comment on before this Planning Application proceeds further through the planning process.

Issue 11. THE STYLE OF HOUSES:

Some of the proposed houses are to have brick facings. They are not in keeping with the style of surrounding houses. Houses like them can be seen from the railway all the way down to London.

According to the Design and Access Statement: '*Decoration and appearance of the proposed properties have been designed to fit in with the local urban house types sympathetically.*' After looking at the plans and the drawings of the proposed houses, I do not think that they will.

Issue 12. AIR QUALITY:

From time-to-time, Site OP 20 and the rest of Hopecroft is subjected to the smell of partly burnt aviation fuel. It appears to depend on the air conditions. It is sometimes strong enough to sting one's nose, especially when there is light wind from the North. Also, Site OP20 is close to the A96 main road.

A SEA Environmental Report (25/01/12) for the ALDP by ACC mentions 'Air Quality' about 160 times, but mentions noise only six times. Has the Council considered air quality at Site OP20 and nearby areas, including measurements of nitrogen compounds and particulates (NO_x, NO₂, PM₁₀, PM_{2.5} etc)?

Issue 13. THE LINES OF BEECH TREES ROUND THE SITE:

These trees are subject to a preservation Order. They are an historic feature of the area and are a much-appreciated amenity for residents, as are the birds that perch or nest in them or flock beyond them. The trees are undoubtedly old. Prior to the present Tree Survey, they were surveyed and treated by a tree surgeon in March 2009. Some trees were removed, some were lopped and some replacement beech trees were planted.

Therefore, it is strange that the Tree Survey done last November on behalf of Persimmon Homes, for their Planning Application, now places a death sentence on most of these trees. Even more strange that all the trees that are in the way of Persimmon Homes' along the South side of the Site are to be cut down while no others are marked for immediate destruction in the Planning Brief or Application.

Previously, similar rows of beech trees once extended all the way down to the bottom of Hopetoun Grange. Some were removed when Binnie Bros. built the present houses in the 1960s. Some were replaced then with smaller species of trees. Since then, nearly all of those trees have been removed, including their replacements, mainly because houses were allowed to be built too close to them.

The proposed houses along 'Lover's Lane', those on the opposite side of the Site and especially those in the North West corner of the Site (e.g., see the Site Plan) are shown far too close to trees, replacement or not. Most of the trees that are proposed to replace the beech trees would be taken out within a few years, as previously, unless they are very small species.

My conclusion about the trees.

To destroy them and the open space between and beyond them would remove a significant amenity and rural freshness from the present residents of Hopecroft/Hopetoun. The trees, the wild life they

attract and the feeling of space behind them are needed all the more since the loss of the open area now occupied by Bucksburn Academy.

The specified 15 metres is not a sufficient distance from houses to safeguard large beech trees or even smaller species of tree. I think that a second opinion is needed about the trees that have been scheduled for immediate removal.

Issue 14. SPECIAL PLEADING?

Are the financial gains of planning applicants and/or their co-applicants acceptable as valid reasons for granting planning permission?

I raise this matter because I should like to know whether the following special pleading, or repetition of it, for a planning application to build houses on the present Site, has any influence in support of the present planning Brief and Application. If so, is that in order?

During the Conjoined Hearing** held before Aberdeen City Planning Committee on 12/12/2005 in connection with the planning applications (A5/1536) for 40 houses on the Site OP1 (now OP20: Hopecroft) made by Bett Homes, the Bett Homes' Land Director spoke and advised that he saw Hopecroft as a flagship site which would enable the company to provide continuity of employment for their directly employed staff and local contractors.

Also, the Deputy Director of the Rowett Institute (owners of the land on which the houses were to built; i.e., the present Site OP20) explained that the Institute was a charity with very little money. Research buildings were now outdated and needed to be replaced. He went on to outline in some detail the nature and importance of the research work carried out by the Rowett and to emphasise the urgency of generating a capital receipt from the sale of the land in order to upgrade the existing buildings at Bucksburn and, together with the University of Aberdeen, to construct in the City the only UK centre of Excellence in Preventative Medicine for Non-Communicable Diseases in Humans. The building improvements were required to be carried out by 2008. Also that without the capital receipt from the sale of the land at Hopecroft the Institute would not be able to fund its immediate needs in respect of the unique Centre of Preventive Nutrition which would maintain the Rowett and the University at the cutting edge of nutrition research. He referred to the importance of the Centre not only for Aberdeen but for Scotland and as a means of securing the reputation of the Rowett and the University world-wide. He also stated that the opportunity to establish the Centre would be lost if there was any delay in the grant of planning permission for development of Hopecroft.

**See the Minute of that Conjoined Hearing.

One may sympathise with the Rowett and Aberdeen University's financial needs, but these should not influence the planning decision.

FOOTNOTES

FOOTNOTE (1): A PREVIOUS CALL-IN.

A special session of the first Inquiry was devoted to Site OP1, to hear the views of the Hopetoun/Hopecroft Action Group (a group of local residents) and ACC planning officers about development on OP1. I spoke at that session. It was convened because a Planning Application, by Bett Homes/Ryden, granted by ACC in January 2006, had been called in by Scottish Ministers; see Footnote (8).

FOOTNOTE (2): ACC's POLICY H8 (2012):

Policy H8 - Housing and Aberdeen Airport (Aberdeen Local Plan 2012) states that:

'Applications for residential development under or in the vicinity of aircraft flight paths, where the noise levels are in excess of 57dB LAeq (using the summer 16-hour dB LAeq measurement) will be refused, due to the inability to create an appropriate level of residential amenity, and to safeguard the future operation of Aberdeen Airport.'

However, the World Health Organisation uses 55 dB LAeq,16, not 57 dB, for similar levels of annoyance. Aberdeen International Airport Ltd's noise-contour maps do not even show the 55 dB contour, or the more logical 54 dB contour.

ANASE (Oct. 2007) '*Attitudes to Noise from Aviation Sources in England*' (Executive Summary) Section 1.4.1 concludes that '*However, for a given LAeq, there is a range of reported annoyance indicating that annoyance is not determined solely by aircraft sound as measured by LAeq*'.

The Government, in its Draft Aviation Policy Framework, Annex D: Noise Descriptors (July 2012) says:

'D.6 The Government acknowledges that the balance of probability is that people are now relatively more sensitive to aircraft noise than in the past. We recognise that people living outside the 57 dB LAeq,16h contour are also affected by aircraft noise and that, for some, the annoyance may be significant. Indeed, many complaints about aircraft noise come from outside the 57 dB LAeq,16h contour.'

D.7 As there is no conclusive evidence on which to base a new level, for the present time we are minded to retain the 57 dB LAeq,16h contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, to facilitate monitoring to provide more information about noise impacts we would welcome views on whether it would be useful to ensure that the contour maps produced annually to show noise exposure around the designated airports are drawn in future to a lower level. We consider that there are two measurement options. One is to use Lden and produce contours down to 55 dB(A). This aligns with the level to which airports are required to map noise exposure under the END. The other alternative is to continue to use LAeq,16h but to map down to 54 dB(A), which is the next logical step down from the current 57 dB LAeq,16h contour along with the concurrent production of night noise contours (LAeq,8h).'

See: <https://www.gov.uk/government/consultations/draft-aviation-policy-framework>

ACC should recognise that flicker of doubt and '*- - that people living outside the 57 dB LAeq,16h contour are also affected by aircraft noise and that, for some, the annoyance may be significant.*' Note the Government's use of '*approximate*'. Aberdeen International Airport Ltd should adopt those measurement options. A 54 dB contour is needed to place the 57 dB contour in relation to the range of noise and community annoyance beyond it.

FOOTNOTE (3): Aircraft-noise contours are produced in a computer model. They are not constructed from continuous measurements round the Airport.

I have placed the word 'actual' in inverted commas throughout this Representation, as in "Noise contours for 2006 ('actual')", because Aberdeen International Airport Ltd's noise contours are computed, via the Civil Aviation Authorities ANCOM computer model, from measurements of noise from standard types of aircraft, weather conditions, flying heights, flight paths, terrain and numbers of flights. They are not made up from real-time measurements.

I asked an expert at Aberdeen Airport whether the Airport '*- - have a real-noise monitoring position/apparatus to the South West of the main runway, beneath where helicopters turn in or out to the West*'. He replied (25/01/13) 'There are no permanent noise monitoring locations'.

The unsuitability of dB LAeq,16 for measuring noise from helicopters:

An ACC planning officer agreed (in 2005) that the 'noise metric' dB LAeq,16 used to measure aircraft noise is unsuitable for measuring noise from helicopters (see *Appendix 1, Response to Local Plan Issues (page 12) of the Report on The Finalised Local Plan: Green Spaces - New Places: Response to Issues*, placed before ACC's Development Plan Sub Committee on 03/03/05).

The Council continues to use dB LAeq,16. **The Council could, however, apply some compensatory latitude when applying its Policy H8, to accommodate the obvious inadequacies of LAeq,16 (see Issue 2, paragraphs 4 & 5 above).**

FOOTNOTE (4): Perhaps flight tracks of helicopters over Hopecroft are not included in Aberdeen Airport's noise contours?

In a letter to me of 2nd March 2005, the Airfield Manager wrote:

'Aberdeen Airport does not record the lateral scatter of flight paths, however as Mr Havelock from the CAA stated within his reply, the production of noise exposure contours of Aberdeen Airport is based upon realistic assumptions about flight paths and track dispersion'

FOOTNOTE (5): Sources of Environmental advice about aircraft.

Some time ago, I asked the Airfield Manager at Aberdeen Airport;

'What is Aberdeen Airport Management's attitude to proposals to build yet more houses under where aircraft currently fly below 1500 feet [now reduced to 1000 feet] on approach or landing or when doing circuits?'

In his letter of reply he said that:

'Aberdeen Airport is unable to comment on this and whether the proposed housing scheme proceeds is purely a council planning issue - - -'

It is not in Aberdeen International Airport Ltd's interest to call attention to the effects of its own environmental nuisance.

Aberdeen Airport Noise Action Plan 2008-2013 contains a table of proposed actions. Most of them are about community relations. The **Aberdeen Airport Noise Action Plan 2008-2013** is very much a public relations exercise. As described above, the map of noise contours in it is 'not fit for purpose'. The Lden contours (a genuflection towards EU regulations) in the Plan are even more difficult to relate to the landscape features beneath them than the contours of dB LAeq,16.

Aberdeen International Airport Ltd belongs to Heathrow Holdings Ltd, which belongs to Ferrovial, a Spanish transport company. BAA ceased to be an 'authority' when it became a plc. It is strange that a commercial enterprise is still allowed to be a main source of information about its own environmental nuisance. Even the CAA is funded by *'those that it provides services for'*.

A more independent body is needed.

FOOTNOTE (6): Do planning officers recognise that helicopters fly low and often over Site OP20: Hopecroft?

In a letter to me dated 24th January 2005, an ACC planning officer wrote to me: *'I have no knowledge of records kept by this Authority of helicopter flight paths over the proposed site [i.e., Hopecroft]'*.

On 23rd August 2006, at the Public Inquiry prior to ALDP 2008, two ACC Planning Officers told the Reporter (Mr Maslin) that they *'had no knowledge of'* the frequent helicopter flights that occur over the Hopecroft and other areas to the West of the airport. One of the Officers produced a map of flight paths that did not show flight paths of helicopters to the West of Aberdeen Airport.

Later, in an email to me of 05/10/2006, he wrote

'Hopecroft is not on the recognised Helicopter Flight paths, which are identified in Figure 7.5 of the BAA Aberdeen-Enviros Environmental Impact Assessment and also in a Committee Report of the former City of Aberdeen District Council about Flight Paths and dated 1984. - - - I accepted later in evidence that helicopters do not always stick to their allotted flight paths and will consequently fly over Hopecroft and that is why helicopter noise was required to be taken into account in the noise impact assessment for Hopecroft'*

[*It was not taken into effective account in that assessment; see the attached Diagram. RJ]

However, in a letter to me of 11/12/12, another planning officer wrote *'We are aware of the general flight paths and that Helicopters fly routinely over the Hopecroft area'*.

FOOTNOTE (7). NOISE FROM GROUND RUNNING AT THE AIRPORT:

Site OP20 is about 60 feet higher at its South end than the airport runway and slopes down towards it; (see p. 14 in the Planning Brief). The slope (*'expansive views'*) increases its exposure to ground running.

Noise from ground running should also be added to road-traffic noise and to the noise from aircraft in the air and taxiing. They should be considered in addition to the 57 db LAeq,16 cut-off level for new houses specified in the Council's Policy H8 (2012).

Aberdeen Airport Noise Action Plan 2008-2013 refers to ground running of aircraft engines:

'To ensure that the environmental impact of aircraft engine running on the local community is kept to a minimum, aircraft operators with maintenance commitments at the airport are expected [sic!] to plan their schedule to avoid the need for ground running of engines at night. Night for these purposes is defined as the period between 22.30 – 06.15 hours local time.'

FOOTNOTE (8). RECENT HISTORY OF PROPOSALS TO BUILD HOUSES ON SITE OP20:

On 19th January 2006, Aberdeen City Council granted Planning permission in detail (subsequently withdrawn) for Bett Homes/and the Rowett Institute to build 40 houses on this site (Application numbers A4/2292 & A5/1536). No adequate noise-impact assessment for the site OP1 had been available at the Departure Hearing on 12th Dec. 2005 at which I and other local residents spoke. Two previous noise assessments had been rejected by environmental health officers as inadequate prior to that Departure Hearing. A member of the Committee expressed concern that *'consideration of the application was somewhat premature in the absence of all supporting information requested from the applicants'*.

Planning Permission for application A5/1536 was granted by the Planning Committee on 19th January 2006. A Noise Assessment was done, but only after the Departure Hearing. Planning permission was granted on 19th January 2006. The noise assessment was "stamped and attached" to the Planning Application. Thus no noise assessment was available to the public before they had made their representations.

That planning application/consent was called in by Scottish Ministers on 21st April 2006 after an appeal by the Hopecroft/ Hopetoun Action Group (a group of local residents). Subsequently, by general agreement, the call-in was sisted, i.e. put on-hold, pending discussion at the forthcoming Public Inquiry into the Local Plan 2008; Footnote (1). The call-in was not revived even though some Issues made to support the call-in were not addressed by the Inquiry

Three noise assessment reports had been submitted for that planning application. Planning officers rejected the first two as inadequate. The third attempt at a noise assessment 'done on behalf of the applicants' was not available to objectors until after the planning permission had been granted (RMP Acoustic Consultants' Noise Assessment Technical Report G/3624B/05 of 11th January 2006). A planning officer kindly copied that Noise Impact Assessment to me. Measurements were presented

in it obscurely, as tables of numbers, and covered an arbitrary period of 24 hours only, between 4th and 5th January 2006. I constructed a diagram to show the measurements of the January 2006 Report more clearly (Diagram attached to this Representation).

I did not receive the Noise Assessment in time to re-present it as diagram before the closing date for written submissions to the 2006 Public Inquiry into Aberdeen Local Development Plan (ALDP 2008). For that reason, the Hopcroft/Hopetoun Action Group was not able to include that diagram in its written submission to the Public Inquiry. Some of my neighbours and I spoke at the Inquiry. I asked the Reporter, Mr. Maslin, if he would look at the diagram then, but he said no, on the reasonable grounds that to do so would be unfair to other contributors-in-writing. I think that the Reporter, Mr Maslin, may not have been fully aware of the extent of the noise at this Site when he came to his decision to allow 30 houses on it.

Subsequently, the Inquiry recommended that only 30 houses could be built on the Site (now OP20), at the south end of it only and well away from the beech trees there. The remaining three fields were to be kept as greenbelt. Aberdeen City Council agreed to those constraints in ALDP 2008. They were considered again and continued for ALDP 2012.

A Proposal of Application Notice was submitted on 16 December 2011, again by Bett Homes, for the erection of 65 units on Site OP20 comprising semi-detached and detached housing with associated access, infrastructure and public open space provision. Following a marketing campaign by J & E Shepherd on behalf of the University of Aberdeen, Bett Homes Ltd were appointed preferred bidders. Their proposal appeared in the Aberdeen Local Development Plan Action Programme 18th May 2012, p. 34. It was abandoned.

FOOTNOTE (9): SUMMARY OF MY MAIN VIEWS ON THE PLANNING BRIEF SENT TO ACC PREVIOUSLY.

(1) The conclusion of the Reporters Report on the Public Inquiry prior to Aberdeen Local Development Plan (ALDP) 2008, that only 30 houses should be allowed on this site, was based on clear evidence. That conclusion was repeated in the Reporter's Report prior to ALDP 2012 and was again accepted by Aberdeen City Council. The Reporters reached that conclusion because the site is noisy; it is close to Aberdeen Airport and it adjoins the A96. Also, the Reporters sought to avoid placing houses too close to rows of beech trees that are under a Tree Preservation Order.

(2) An adequate new Noise Impact Assessment and a convincing Tree Survey are essential if the Reporter's conclusions are to be over-ridden. It will not be satisfactory if the Reporter's conclusions are diverted into a fog of references to Structure or other Plans that are not based on the detailed, site-specific evidence that was before the Reporters. Neither will it be satisfactory if Aberdeen City Council (ACC) side-steps the Reporter's conclusions by accepting inadequate Reports.

(3) If further Reports or Surveys are produced, they should be advertised for public consultation for an adequate period of time to allow comment before the planning process proceeds.

(4) I commented on the position of the 57 dB LAeq,16 aircraft noise contour over Site OP20 Hopcroft in relation to ACC's Policy H8 (2012) and on the confusing representation of the map of noise contours for 2006 ('actual') in Aberdeen Airport Ltd's Noise Action Plan 2008 - 2013. I emphasised that Hopcroft is only about 400 metres from Aberdeen Airport's main flight path and that it is over-flown frequently by low-flying helicopters. Those frequent flights over Site OP20 Hopcroft do not appear to be acknowledged in the shape of the 57 dB LAeq,16 noise contour for 2011 ('actual').

(5) I concluded that a second opinion should be obtained for the Tree Survey.

(6) I commented on the pervasive noise from the A96, the congestion of traffic on Hopetoun Grange and that the Brief does not show enough parking spaces for the properties it proposes to open onto

Hopetoun Grange. I could not find a Traffic Survey amongst the online Reports submitted with the Planning Application.

FOOTNOTE (10): WHY DO I THINK THAT I CAN COMMENT USEFULLY ON THE PROBLEM OF AIRCRAFT NOISE?

My house is about 40 metres from the South side of Site OP20 and is frequently over-flown, sometimes at less than 500 feet, by helicopters that cause my house to vibrate. Conversation in my garden and in the streets near my house is interrupted and sometimes stopped by aircraft noise.

In 1975 I wrote to the Scottish Office to point out that the (then) Aberdeen Council, when attaching planning permission for night flights to planning permission for the new airport-terminal, had contravened a condition of the Town & Country Planning (Scotland) Act 1972. That letter resulted in the 1976 Public Inquiry and the subsequent planning condition that banned night flights from the airport for the following 30 years.

I was a member of Aberdeen Airport Consultative Committee for two years, 1975-6. I helped to negotiate BAA's grants for double windows and mechanical ventilators in bedrooms at Hopcroft.

I am a retired University Senior Lecturer. I have two higher degrees in scientific research (Ph.D, D.Sc) and more than 40 years experience in analysing the results and claims of scientific papers.

END

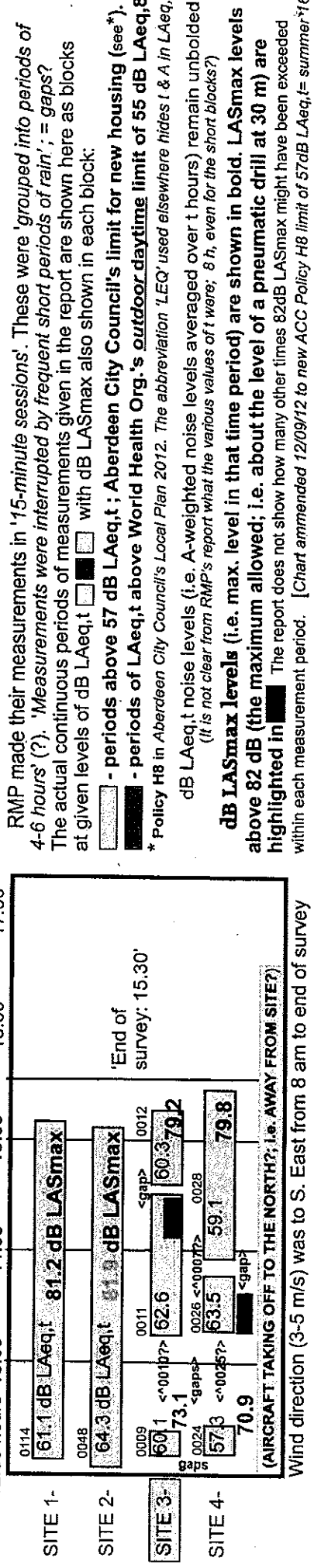
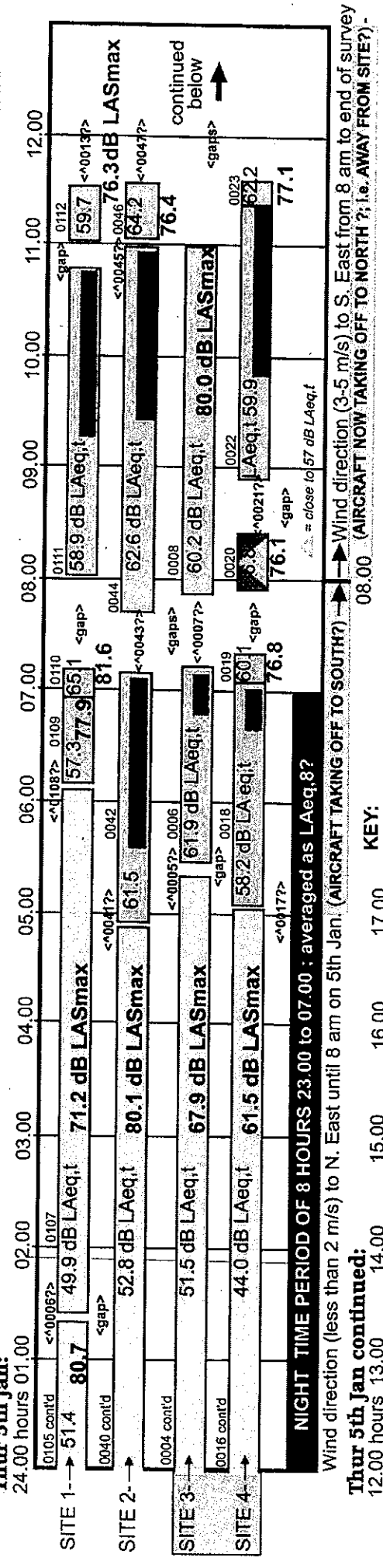
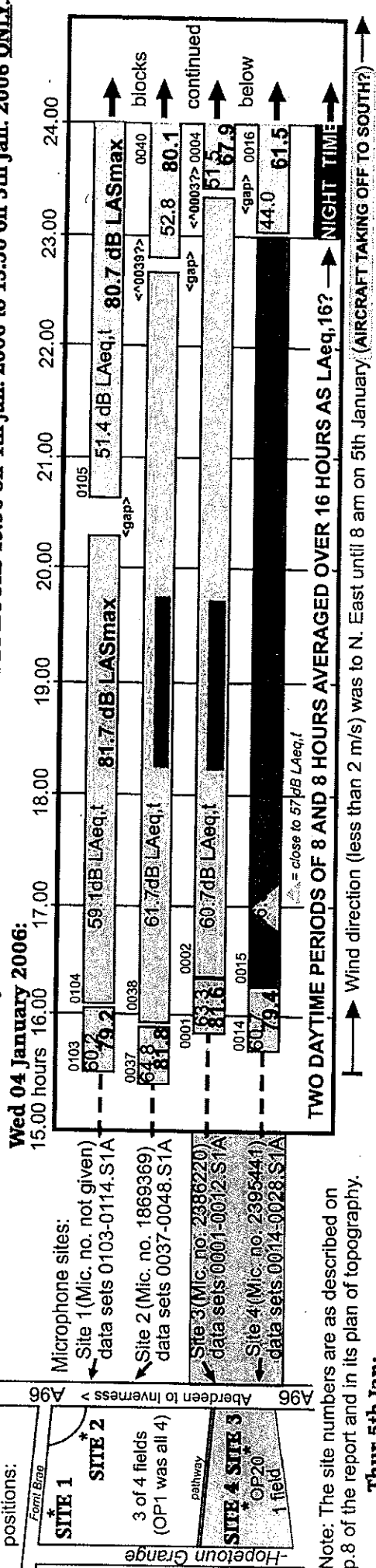
Richard Johnson 6th February 2013



To show Site OP20 Hopecroft in context

THIS DIAGRAMATIC ASSESSMENT FOR A. NOW WITHDRAWN, PLANNING APPLICATION FOR PREVIOUS SITE OP1, SHOWS WHERE NOISE LEVELS WERE HIGHER THAN THE LIMIT OF 57 dBAeq,t NOW SET FOR NEW HOUSING BY ACC'S POLICY H8 - Housing and Aberdeen Airport (Local Plan 2012).

NOISE DATA FOR THE HOPECROFT OP1 SITE: RMP ACOUSTIC CONSULTANTS' NOISE ASSESSMENT TECHNICAL REPORT G/3624B/05 OF 11TH JANUARY 2006
The Measurements were made by RMP Consultants DURING THE 24 HOURS 15.30 on 4th Jan. 2006 to 15.30 on 5th Jan. 2006 ONLY.



KEY:

RMP made their measurements in '15-minute sessions'. These were 'grouped into periods of 4-6 hours (?)'. 'Measurements were interrupted by frequent short periods of rain'; = gaps? The actual continuous periods of measurements given in the report are shown here as blocks at given levels of dB LAeq,t [] with dB LASmax also shown in each block:

- [] - periods above 57 dB LAeq,t ; Aberdeen City Council's limit for new housing (see*).
- [] - periods of LAeq,t above World Health Org.'s outdoor daytime limit of 55 dB LAeq,8. * Policy H8 in Aberdeen City Council's Local Plan 2012. The abbreviation 'LEQ' used elsewhere hides t & A in LAeq,t).

dB LAeq,t noise levels (i.e. A-weighted noise levels averaged over t hours) remain unbolded. (it is not clear from RMP's report what the various values of t were; 8 h, even for the short blocks?)

dB LASmax levels (i.e. max. level in that time period) are shown in bold. LASmax levels above 82 dB (the maximum allowed; i.e. about the level of a pneumatic drill at 30 m) are highlighted in [] The report does not show how many other times 82dB LASmax might have been exceeded within each measurement period. [Chart amended 12/09/12 to new ACC Policy H8 limit of 57dB LAeq,t = summer '16hr]

Note: The site numbers are as described on p.8 of the report and in its plan of topography.

Thur 5th Jan:

24.00 hours 01.00 02.00 03.00 04.00 05.00 06.00 07.00 08.00 09.00 10.00 11.00 12.00

0105 cont'd <^0006?> 0107 49.9 dB LAeq,t 71.2 dB LASmax

0040 cont'd <gap> 80.7

0004 cont'd 52.8 dB LAeq,t 80.1 dB LASmax

0016 cont'd 51.5 dB LAeq,t 67.9 dB LASmax

0016 cont'd 44.0 dB LAeq,t 61.5 dB LASmax

0016 cont'd <^0017?> 61.5

0005?> 0006 61.9 dB LAeq,t

<gap> 0018 58.2 dB LAeq,t

0019 60.1

0019 76.8

0020 76.1

0022 77.1

0023 77.1

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PI - Proposed Development at Hopetoun Grange. Bucksburn.

From: [REDACTED]
 To: "pi@aberdeencity.gov.uk" <pi@aberdeencity.gov.uk>
 Date: 31/01/2013 20:36
 Subject: Proposed Development at Hopetoun Grange. Bucksburn.

Dear Sirs,

In response to the Notice I received to the above Planning Application as a Notifiable Neighbour please find attached my formal response. I have also copied the councillors for my Ward and the Chairperson of the Local Community Council for their information.

Yours sincerely

Mhorag Simpson

9 Hopcroft Avenue, Aberdeen, AB21 9RN

29th January 2012

Dear Sirs,

Planning Application 130029 Dated 17 January 2012

Proposed development at Land to North of Hopetoun Grange, Bucksburn, Aberdeen

I write with reference to the above Planning Application ("the Application").

I have been resident in Hopcroft Avenue for 29 years. The rear of my property - and those of all the properties on the eastern side of Hopcroft Avenue - currently faces directly over the proposed development and views that I have enjoyed during the time I have lived in my house will be destroyed by it. I have studied the Council's Guide to Commenting on Planning Applications and I am aware that loss of view is not deemed by the Council to be, in itself, a valid reason to object to a planning application, however I would very much ask the Council to consider this in addition to the more material considerations that I wish to point out in objecting to the Application.

My reasons to object to the Application are as follows:

Impact of access to the proposed development from Hopetoun Grange

I understand from the Hopetoun Grange Planning Brief of 26 November 2012 that primary access to the proposed development will be from Hopetoun Grange. Hopetoun Grange is an area of great amenity to the local community. It is particularly popular with dog walkers and other residents who use it as a pleasant walking area. Siting the primary access to the proposed development on Hopetoun Grange will not only lead to material loss of amenity to those people but, by increasing the amount of traffic in both directions on Hopetoun Grange (a very narrow road), would undoubtedly create safety issues for pedestrian road users.

Aircraft Noise

I read in the Planning Brief that due consideration has been given by the Applicants to the impact of noise on the proposed development from Aberdeen International Airport. As a resident of Hopcroft Avenue I have experienced at first hand the effect of increased noise from the Airport over the last few years. I find it extremely hard to believe that noise from the airport is within acceptable levels on a regular basis and I would encourage the Council to ensure that the developers demonstrate without doubt that noise levels are within the 57dB limit at all parts of the proposed development prior to any approval of planning permission.

Effect on Local Schools

Local schools in the Bucksburn area are already very stretched. I was therefore extremely surprised to read in the Planning Brief (Section 8.7.1) recognition from the Applicants that the proposed development would only increase this pressure. The Applicants' solution to this is that 'detailed discussions between the developer and the Council's Education Service will be required as part of the planning application process'. This hardly provides assurance that the issue will be adequately resolved prior to any development commencing.

Effect on Trees in the area

I understand that there is a protection order in place on many of the trees in the Hopetoun Grange/Inverurie Road/Forrit Brae area. I assume that the reason for this protection order is to protect the amenity that is provided by these beautiful trees. The Applicants claim in the Planning Brief that the majority of these trees are in 'very poor and declining condition' and 'with a very limited life expectancy'. The Applicants then state that the trees are 'likely' to need to be removed in the next 10-20 years. Another way of looking at this – should the Applicants' claims be accurate – is that many of the trees will survive for a further period of up to 20 years. This hardly generates a compelling need to fell these trees. I am therefore concerned that healthy trees in the area will be felled to make way for the proposed development leading to significant loss of amenity for the current residents. Any new trees planted by the Applicants would take many years to grow to the stature of the current trees which would only serve to add to the loss of amenity.

I trust that the Council will give due consideration to the above objections to the Application and I look forward to its response

Yours sincerely

[Sent by e-mail]

Mrs Mhorag Simpson

P&SD Letters of Representation		
Application Number: 130029		
RECEIVED 01 FEB 2013		
Nor	Sou	MAp
Case Officer Initials: JAF		
Date Acknowledged: 06/02/13		

North

Mr Alan Cromar
23 Hopcroft Drive
Bucksburn
Aberdeen
AB21 9RJ

5th February, 2013

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

FAO Jane Forbes

Dear Sirs,

Proposed development for 65 residential houses including infrastructure and landscaping - Reference Number 130029

With regard to the above Planning Application I would like to make the following comments and objections for your consideration;

1. Site OP20 (Hopcroft) as identified in the Aberdeen Local plan sets out an expected level of development of 30 units, this level of development has been established under a policy where all development, whether on brownfield or greenfield sites, must comply with policies which seek to achieve the objectives of creating a sustainable city. The developer has proposed a substantially and unacceptably higher level of development at 65 units. Many of the issues raised here and undoubtedly by other neighbours could be addressed by proposing a reduced and more acceptable level of units. The developer has used the density levels of surrounding areas, Hopetoun, Sclattie and Wagley as justification, however these housing areas were developed in the 1950's and 60's and do not take cognisance of modern 'Designing For Streets' policies.
2. The house identified as Plot 41 on the Site Plan is particularly close to my property and that of my neighbours and there is a very real concern that our privacy will be compromised and that there may be a risk of over-looking and possibly over-shadowing. The area that contains houses from Plot 41 to 47 appear to over-designed and a lesser density would resolve this issue.

3. With the SUDS pond being located in close proximity to our existing properties there is a concern that we may be affected by unpleasant odours. What is to be put in place to ensure that the facility is properly maintained for effective operation.
4. The design of the houses are not in keeping with the surrounding area, being generally storey and a half. These new house types are shown as full 2 storey and none of these houses are stretching the boundaries of modern/ good design but more of a 'same old, same old' approach.
5. The proposal for 65 units will put extreme pressure on the local infrastructure, in and particular Hopetoun Grange. This flies in the face of '...creating a sustainable city..' and where the reality of the situation will mean the local residents having to endure longer periods of traffic congestion. This roads network is already badly abused by speeding traffic using the route as a 'rat run' and heavy congestion at the 4 mile roundabout means that traffic find it nearly impossible to access the A96 at periods of peak traffic. As a starting point, the yellow hatching of the roundabout at the 4 mile on the A96 is without doubt essential.
6. There is a great deal of dubiety over the accuracy of the boundary between the proposed site and the existing Hopecroft housing development in particular relating to the existing raised embankment between the sites. There is some history of correspondence on this matter with the Rowett Institute but the question over ownership still remains.
7. The Development Plan in Habitat Survey is different from the Site Layout drawing DL-001

I sincerely hope that the above is taken into consideration when determining this application and please do not hesitate to contact me should you require further information.

Yours Faithfully



Alan Cromar

P&SD Letters of Representation		
Application Number: 130079		
RECEIVED - 8 FEB 2013		
Nor	Sou	MAp
Case Officer Initials: JAF		
Date Acknowledged: 12/08/12		

NATH

From: <webmaster@aberdeencity.gov.uk>
To: <pi@aberdeencity.gov.uk>
Date: 03/02/2013 19:16
Subject: Planning Comment for 130029

Comment for Planning Application 130029

Name : Steven & Elaine McLenan
Address : 25 Hopecroft Drive
Bucksburn
Aberdeen
AB21 9RJ

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : We wish to make you aware of a number of strong objections that we have with regard to the proposed development for 65 residential houses on land to North of Hopetoun Grange, Bucksburn, Aberdeen. As an immediate neighbour to the site of the proposed development, we are of the view that the proposed development will have a serious impact on our standard of living.

Our specific objections are as follows:

The house on plot 41 of the site plan will directly overlook our rear garden. Since the property will be built on land higher than ours the close proximity combined with the height of the house will mean that our back garden will be substantially overshadowed. The closeness of the property would also cause an invasion of our privacy. I note from the plans for this type of house that a window on the gable end is optional but this would look straight in to our property. We feel we have the right to have enjoyment of a private, quiet & peaceful garden as it is at the moment.

As marked on the plans a raised area currently divides the houses in Hopecroft from the site of the new development. This raised earthwork is approximately 10 feet and 6 inches wide with a dry stone dyke at each side & no definite visual boundary. The area is currently maintained by us. In accordance with measurements in the feu disposition dated 15th November 1965 our property measures 140 feet & 8 inches in length. According to the boundary measurements we own 7 feet and 6 inches of the raised earthwork area & the Rowett owns the remaining 3 feet. We think the boundary line shown on the site plan is incorrect as it shows that most of this area of land will be in the new development. We have discussed this with Persimmon Homes who advised that they are unsure who owns this piece of land & at this point do not know if the raised area will be left in place or taken out. We are sure you will agree that this is something that should have been decided before the plans were lodged. We would like to see a definite border being put in place.

We are also concerned about the close proximity of the SUDs to our property in particular the possibility of unpleasant odours. This could mean a limitation of our enjoyment of our back garden due to the quality of air. We have enjoyed sitting in our back garden for the last 12 years. We are also concerned that the area may become unsightly & be a potential safety issue particularly for children. Also will adequate maintenance regimes be put in place to make sure the SUDs operate sufficiently.

We are also concerned about road safety & the extra traffic that the extra 65 houses will bring to the area. This is made much worse with the many people who are not residents of the area coming from Forrit Brae down Hopetoun Grange in the rush hour to avoid the tailbacks at the roundabouts. Most of the time they are travelling in excess of the speed limit. We feel that this is something that needs to be looked at closely when the planning application is considered.

The Aberdeen Local Development Plan showed that no more than 30 houses should be built on the site. The site plan shows that 65 houses will be built which we feel is an unacceptable high density & overdevelopment of the site. Persimmon Homes have used historical density values from Hopecroft, Hopetoun, Sclattie & the Wimpey houses at Newhills which we feel are no longer applicable at this point in time. We feel that reducing the densities would resolve many of the above issues. The design & appearance of the new houses are also not in keeping with the surrounding

area which are predominantly one and a half storey's high.

We would be grateful if you could take our objections in to consideration when determining the application. We would also be happy for a representative of the planning department to meet us at our property to allow them to see our objections first hand.

P&SD Letters of Representation		
Application Number: 130029		
RECEIVED - 4 FEB 2013		
Nor	Sou	MAp
Case Officer Initials: JAF		
Date Acknowledged: 08/02/13		

North

37 Hopetoun Grange,
Bucksburn,
Aberdeen.
AB21 9RD

1st February, 2013.

Planning and Sustainable Development,
Marischal College,
Broad Street
Aberdeen

Dear Sir,

REF: Application no. 130029 Proposed Development at Land to North of Hopetoun Grange by Persimmon Homes.

I have examined the documents published in support of the above named development and wish to make representations as follows.

As a member of the Hopetoun Action Group that took part in the Public Enquiry in 2006 I consider that the application has largely ignored the results of this enquiry in several aspects and would ask why conduct a Public Enquiry if the conclusions are to be ignored?

The Enquiry agreed that the field was suitable for 30 houses, not the 65 proposed. Access to the development would be off Hopetoun Grange and houses would have no private drives giving direct access to Hopetoun Grange.

There would be a 15metre gap between the trees on Hopetoun Grange and the rear of the new houses. Additional planting would take place in a zone behind the trees on Hopetoun Grange and behind the existing houses on Hopecroft Avenue to provide "wildlife corridors".

When we highlighted the lack of maintenance of the trees surrounding the site over the previous 40 years an undertaking was made to remove dead branches, cut down trees that were passed their best and to plant replacement saplings. This work was done in 2009 and although some of the saplings have subsequently died largely due to neglect, the fact remains that this work was carried out.

The Tree condition report carried out for Messrs Persimmon is I believe an exaggeration of the present position in order to tie in with the developer's plans.

Our concerns about the increase in traffic caused by the overdevelopment of the site have not been addressed, as there is no Traffic Assessment Report among the published documents. Our own assessment is that some 200 additional vehicles would need to be catered for, causing increased problems in the lower part of Hopetoun Grange an area where conflict between neighbours has already occurred as competition for road space increased.

The area in the upper part of Hopetoun Grange where, if the development is allowed, single private driveways serve some three four bedroom house, the competition for space will result in vehicles parking on the road as the private cars find that the private area in front of the houses inadequate. This situation will lead to congestion on the road at particular times of day.

The Design and Access Statement states that "Decoration and appearance of the proposed properties have been designed to fit in with the local urban types sympathetically". Where in the local area may I ask are houses constructed with facing brick? The documents do not say what colour these bricks are, so how can we judge if they are "sympathetically designed" or not. Could it be that this is the cheapest form of finish they could choose?

The Design and Access Statement also states "The design principles for the development site have primarily followed the requirement as set out in the Local Plan". I would disagree with this statement, since the number of houses has more than doubled, houses are allowed private drives to Hopetoun Grange, all mature trees are to be felled, the need for wildlife corridors ignored and the houses have not been sympathetically designed, but rather packed together to maximise the developer's profit.

I am disappointed that the developer has been allowed to produce what I believe is an unattractive and out of place proposal for this site and ask that my observations given above are considered carefully.

Yours faithfully

Mr. Ronald McIntosh