

CULTER COMMUNITY COUNCIL



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14th February 2014

Mr Robert Forbes
Senior Planner (Enterprise, Planning & Infrastructure)
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen AB10 1AB

Dear Mr Forbes,

Planning Application P13/1865: formation of access track associated with Planning Application Ref. P12/0166 (1st wind turbine at South Lasts Farm).

The members of Culter Community Council (CCC) have already expressed deep concerns and strong objections to part of this access track with its entrance/exit on to Malcolm Road, Peterculter within their letters of objection to a second wind turbine and access track at South Lasts Farm (Planning Application (P13/1122 and its successor P13/1859). The members of CCC were therefore doubly concerned to find within this new application (P13/1865) a proposal to extend the access track beyond the 2nd turbine (to be situated some 400 metres off Malcolm Road) to as far as the now approved access route to the 1st wind turbine from Contlaw Road on to Bean's Hill (P12/0166) some 1.4 km distance from Malcolm Road. The Chairperson of CCC therefore asked me to write to you expressing the members deep concerns and objections and their reasons for them while our Planning Liaison Officer is indisposed. They are as follows:

- The members of CCC objected to the 1st turbine (P12/0166) but accepted its approval along with the route of its access track leading off Contlaw Road as being the most logical and least disruptive access to Bean's Hill, that is, it will avoid the use of B979, a strategic route in contributing to the vital flow of traffic around the city of Aberdeen
- Our overriding concerns and objections to **this** proposed new access track relate to the safety of the road users of Malcolm Road (B979) which we consider has not been properly and fully addressed.
- Physically the B979 is a typical narrow, winding, secondary road, without pavements and without speed limit on which HGVs have to pass each other with care. However for the last

25-30 years it has been in strategic use as the ‘unofficial Aberdeen Bypass’ since its junction with North Deeside Road (A93) at Milltimber Brae just east of Peterculter was moved some 100m and its steep gradient adjusted to allow HGVs to use it.

- Since then it has been heavily used by cars, vans and other goods vehicles of all sizes as well as by HGVs (10-12% of all the traffic using it, according to statistics gathered by consultants for the AWPR – Aberdeen Western Peripheral Route). Observations by members of CCC equated this to 10 -12 HGV trips **per hour** between early and late commuting times.
- Traffic can therefore skirt around the city more quickly and easily to access the large industrial/commercial estates to the north, (e.g. Dyce, around the Airport), west, (e.g. in and around Westhill) and south, (e.g. Tullos, Altens and Portlethen). This includes many cars with commuters who work on these estates since there are no suitable bus services to discourage the use of cars.
- The B979 also connects with other B routes as well as the A routes in and out of Aberdeen. This allows drivers of cars, vans, lorries and HGVs for business (or tourist) purposes the choice of moving very much further north (Peterhead, Fraserburgh), northwest (Inverness and beyond), west (the Cairngorm National Park) or to go south (including the continent) without entering the city.
- All of the above has resulted in the B979 becoming a strategic traffic route not a ‘Local’ or ‘rural’ B route with a steady stream of traffic moving along Malcolm Road at all hours.
- At commuting times the traffic is so heavy that queues, often over a mile long, regularly occur at pinch points such as the staggered junction of the B979 with the South Deeside Road (B9077) near the Milltimber Bridge over the River Dee; the Milltimber Brae (B979)/North Deeside Road (A93) junction to the east of Peterculter and the Malcolm Road (B979)/North Deeside Road (A93) junction at the west end of Peterculter
- The chosen site for this proposed new track to access both the first (approved) and proposed second turbine will join the strategic Aberdeen ‘bypass’ some 200/250m from the junction of the access road to the small North Lasts community but which, more importantly, serves Leith’s Sand and Gravel Quarry, well used by lorries transporting much needed construction material. This section of the B979, from the narrow one way bridge over the Ord Dam and Burn, round two fairly blind bends near the Quarry access road and the proposed new access track to as far south as the entrance to Denmill has been the scene of various, often serious, accidents in the past, at least one being fatal. To add the distraction of another junction for commercial purposes (as well as a massive turbine) at this point very much increases our concerns on the safety of this section of the present, much used, ‘Aberdeen Bypass’.
- The supporting documentation for the consented (first) turbine at South Lasts (which will stand at ~1.4 km distance from the B979) quoted a study (Schreuder, 1992) on two accidents “in the vicinity of wind turbines” which resulted in advice being given that “turbines should not be located in places where the driver needs to pay great attention.” It takes only one driver to be momentarily distracted to have or cause an accident. This could too easily happen on a road as busy as this one.

In the supporting document for this application for a new access track from to Malcolm road to the approved turbine on Bean’s Hill, the ‘Traffic Route Management Plan’ (TRMP) by consultants JMP on behalf of LOCOGEN LTD the members of CCC find that

- it is the result of a desktop study (p 2 para 1.13) based on “comparison of available map routes and by a site visit undertaken in August 2013.”
- It also states (p 2 para 1.12) that “Discussions are ongoing with Aberdeen City Council (ACC) Roads Department for the construction of the new simple priority junction with the B979 on which an agreement in principle has been reached and is now proceeding through the appropriate approval process”
- It further states (p 1 para 3) that their remit is to “define mechanisms for managing the construction related vehicular traffic” and also “the process for consultation with parties who may be affected by construction traffic” (but does not say who they are or how this consultation will be conducted)
- Adding that “in particular the TRMP will look at the management and mitigation of traffic impacts on the rural road network leading to the site.”

(From these four points which are made in the introduction (Chapter 1) the members of CCC began to question if the consultants were aware of the strategic part the B979 plays as the ‘unofficial Aberdeen Bypass’ from Stonehaven via Peterculter to Westhill and beyond and because it was a desktop study chose to treat it as a rural /local route as the maps would indicate.)

- In Chapter 2 analysis of the construction phase details, summarised in Table 2.1 (p 4) shows the total number of HGV trips, 229, which will be required and in Table 2.2 (p 5) how these will be phased over the three month construction period (141, 60, 28 respectively, including 7 abnormal loads for turbine delivery) which in the first month, “equating to an average of 8 trips per working day” may give a short term marginal increase in the number of HGVs already using Malcolm Road. CCC does notice however that there is no mention of what will happen to final construction waste and where it will be disposed of – onsite or off it.
- In Chapter 3, dealing with minimising and mitigation of construction traffic impacts, the report states that “the designated route for construction vehicles is envisioned as being via the A93 and the B979 route” (p 6 para 3.4).
- However “the reduced speed limit of 20mph proposed (p7 para 3.7) for all construction HGVs along the B979 from the A93 to the site” (of the junction for the proposed new access track) and “local residents will be welcome to report any speeding to the site manager” (p7 para 3.8) will not be welcomed by other users of this narrow, winding section of the B979 where overtaking is not readily practicable or safe. These other drivers will all have their own timetables and work schedules which they need to, and are expected to be adhered to by **their** employers. Frustrated drivers are more likely to have, or to cause, accidents. CCC must object to these proposals for a strategic traffic route in the interests of safety.

Bearing in mind the concerns and objections, with reasons, expressed above and the unique position of Malcolm road as part of the strategic but ‘unofficial Aberdeen Bypass’ – at least until the official bypass, the AWPR, is completed and in use by 2018 at the earliest – the members of CCC contend that the original approved access route via Contlaw Road to the approved turbine on Bean’s Hill should remain and the new entrance from Malcolm Road refused because;

- The original access track will avoid disruption to the strategic traffic flows around Aberdeen city by avoiding the use of the B979
- it is already stated (p 6 para 3.5) that “alternatively construction vehicles could be brought in using the existing farm access.” (This is because pinch points along the route have been identified (Chapter 4 p11 Fig. 4.1), discussed in more detail (pp 11, 12 paras 4.2 - 4.8) including their use for abnormal loads, and recommendations summarised in Table 6.1(p 29).

Other supporting documents show them and plans put in place for dealing with them, e.g. Pinch Point Location Plan and the 4 Pinch Point Swept Path Analyses).

The members of CCC further contend that part of the proposed new track could and should be used, in reverse as it were, through the farmyard and passing the steadings and cottages but only as far as the proposed 2nd turbine if it gains approval. This would:

- o obviate the risks and costs of having to bridge the BP 36" oil pipeline and the Shell 20" gas pipeline and the involvement of these companies in the process as well as remove the disruption to traffic on Malcolm Road

Whatever route is finally chosen (A93+Contlaw Road? or A93+B979? or some other?) and, if given planning permission, the members of CCC approve the recommendation made (p 31 para 6.9 final bullet point) that a 'test run should be made with a 25m Blade Trailer' to ensure hazards and pinch points have been made passable and safe.

The A93 (North Deeside Road) is also a strategic route but outside the section where it converges with the B979 to pass through Peterculter it carries more expected levels of HGVs. At commuting times however it becomes one unending traffic queue with long stops at traffic lights. The members of CCC consider the best time for moving a convoy of seven abnormal loads anywhere around Aberdeen to reach the consented turbine site would be later on a light summer evening or very early on a summer Saturday or Sunday morning.

Since the consultants are also seeking to "define the process for consultation with parties who may be affected by construction traffic" (TRMP p 1 para 1.3) the members of CCC would welcome a short presentation on the proposals within the TRMP Report and to discuss how to minimise effects on our community.

Yours sincerely,

Lavina C Massie (Vice Chairperson) Culter Community Council

Cc: Councillors Boulton, Malik and Malone
Mr Iain Hamilton, Roads Engineer, ACC