

1.

From: [Louise MacSween](#) on behalf of [LDP](#)
To: [Laura Robertson](#)
Subject: FW: OP58 Countesswells area development - Roads / Access
Date: 27 March 2014 10:51:51

From: PI
Sent: 27 March 2014 09:52
To: LDP
Subject: FW: OP58 Countesswells area development - Roads / Access

From: Wilson, Paul [REDACTED]
Sent: 26 March 2014 13:06
To: PI
Subject: OP58 Countesswells area development - Roads / Access

I've no problem with this development however there needs to be better links and upgrades to the surrounding roads with improved access into town for these developments to go ahead.

A direct road that links Lang Stracht, Skene road, Countesswells Road, Craigton Road and North Deeside Road should be included as part of the OP58 development, i.e. a version of Anderson Drive, dual lane / dual carriageway linking Cults to Kingswells

Key access roads into Aberdeen should be identified and marked for upgrade to dual lane; an investigation should be carried out to examine the combined effect of the additional traffic from OP52, 57, 51 and 58 with particular attention paid to Countesswells Road during rush hour.

Regards
Paul

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2.

From: [Louise MacSween](#) on behalf of [LDP](#)
To: [Laura Robertson](#)
Subject: FW: Countesswells Development Framework and Phase 1 Masterplan
Date: 27 March 2014 10:52:11

From: PI
Sent: 27 March 2014 09:52
To: LDP
Subject: FW: Countesswells Development Framework and Phase 1 Masterplan

From: Robert Grant [REDACTED]
Sent: 26 March 2014 14:32
To: PI
Subject: FW: Countesswells Development Framework and Phase 1 Masterplan

>
> Sirs
>
> Countesswells Development Framework and Phase 1 Masterplan
>
> The Countesswells site (OP58) is a significant greenfield release (taken
> from an area of Aberdeen's former greenbelt redesigned as greenspaces or
> simply 'wedges') as suitable for 3000 homes and 10 hectares of employment
> land. I have no objections to the principle of this large scale new
> community but would ask that more consideration is given to green networks
> and connectivity between the neighbouring woodlands allowing for positive
> enhancements. I would stress that green networks and infrastructure should
> form a connected spine through the site interconnecting the adjoining
> woodlands and creating good, vibrant and worthwhile greenspaces, linkages
> and habitats to serve any real purpose for creating a sense of place and
> interconnected community.
>
>
> I would contend that much of the greenspace appears fragmented and lacking
> in the cohesion to give workable corridors for recreation, ecological and
> social connections.
>
>
> Regards
> Robert Grant

6e Craigton Crescent Peterculter

>

3.

28th March 2014



Planning & Sustainable Development
Enterprise, Planning and Infrastructure
Aberdeen city council
Business Hub 4
Marischal College
Broad street
Aberdeen
AB10 1AB

SCOTTISH WATER

The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Tel: 077443876211
E: Sophie.day@scottishwater.co.uk
W: www.scottishwater.co.uk

Dear Development Plan Team,

Countesswells Development Framework and Phase 1 Masterplan: Statutory Public Consultation

I write with reference to your letter dated 14th of March 2014 requesting comments in relation to the above consultation.

As identified in the masterplan, a water impact assessment and drainage impact assessment have been carried out:

Water: These developments are on the outskirts of Hazelhead Park. It has been identified in the WIA that an off-site mains upgrade will be required once development exceeds 300 HU, this will be carried out by the developer. Also additional capacity will be required at Kingshill District Service Reservoir and potentially Pitfodels Treated Water Pumping Station.

Waste: This development will have an impact on the sewers and pumping stations downstream, all the way down to the WWTW. Waste will drain down Countesswells Road and Springfield Road to Garth Dee Siphon. The DIA carried out has identified what impact the development will have on the existing network and the developer is responsible for carrying out any mitigation, with a Reasonable Cost Contribution from Scottish Water. All new infrastructure will have to meet Scottish Water's standards & specifications if it is to vest with us.

Scottish Water may also vest SUDs if they comply with our current design standards. It should be noted that Sewers for Scotland 2 will be superseded by Sewers for Scotland 3 in the next few months. If the Developer wishes their SUDs to be vested by Scottish Water, early engagement is always recommended.

In addition Water for Scotland 2 will also be superseded by Water for Scotland 3 in the next few months.

Please contact me should you have any queries.

Yours Sincerely

Sophie Day
Developer Planner

4.

From: PI
To: [Laura Robertson](#)
Subject: FW: Countesswells development framework and master plan consultation
Date: 31 March 2014 11:14:31

From: karen soden [REDACTED]
Sent: 28 March 2014 16:28
To: PI
Cc: Marie Boulton
Subject: Countesswells development framework and master plan consultation

Dear Sir

I have read through the document and would like to give the following feedback.

Phase one of the development will be welcomed by me if it is as described in the document, in particular that I will loose my country outlook but instead will have houses on a street ie not flats or industrial units.

I feel that it is extremely important that the road structure is established prior to the building works. Currently the C189/Kirk Brae is nose to tail with traffic at rush hour and very busy at all other times. Construction work would not be compatible with this. Also the document talks of reducing this road as a rat run making it a secondary road, I trust this is adhered to and not just an empty proposal to pacify residents.

Karen Soden
Coswood House
Kingswells
AB15 8QD

Section 4. The Opportunity and Vision.

Section 4.1, p.41

From the initial presentations and consultations in June 2012 through to the present one, I have been delighted to see the emphasis on sustainability. In the present document this is again highlighted where it is stated that "The site at Countesswells offers increased opportunities for sustainable solutions".

Section 4.2, p.43. Strategic transport connections

It is stated here that "Countesswells will aim to create a place where people can live and work without relying on private transport", and I am pleased to see throughout the document the emphasis given to pedestrian and cycle access, core paths, public transport etc. (particularly sections 5.4.1 and 5.4.2).

However, there is also another alternative to private transport: car sharing. In Aberdeen City the organisation Co-Wheels has been operating for two years with great success. It was initially promoted by the Council, and continues to be much used by the Council. It is one of the fastest growing Co-Wheels schemes in the country and in Aberdeen it continues to increase the number and types of cars available. I believe that there is a great opportunity to extend this scheme to Countesswells, and to integrate it into the community right from the start, with parking bays for the share cars designed into the plans. Perhaps a further stimulus to a 'car free lifestyle' could be with some properties available more cheaply by being built without garages but close to the share-cars parking bays?

Section 6.4, p.92. Phase 1 - Block Design Principles

It is stated here that "Architecture should also strive for strong environmental standards, reducing energy consumption and helping Countesswells meet its sustainable aspirations". There is huge potential in a new development such as this to install, at the outset, the latest technology to promote sustainability and minimise carbon emissions. I hope that consideration will be given to:

- Use of District heating/Combined Heat and Power (CHP) for groups of homes or larger community and commercial buildings (as has been done in several communities by Aberdeen City Council)
- Use of renewable energy wherever possible in both private and corporate buildings by:
 - solar PV, solar thermal panels
 - ground source heat pumps
 - wood burning stoves

Also, it would be a real show-case development if it included some truly carbon-neutral 'eco-homes'. Although initially these would be more expensive to buy, in the long term, with energy prices rising, the costs for homeowners would be greatly reduced.

Elizabeth Lindsey
April 2014

6.

From: [PI](#)
To: [Laura Robertson](#)
Subject: FW: Countesswells Development Framework and Phase 1 Masterplan
Date: 04 April 2014 09:30:56

From: [REDACTED]
Sent: 03 April 2014 20:17
To: PI
Subject: Countesswells Development Framework and Phase 1 Masterplan

I would like to register my objection to this proposed development.

There is insufficient traffic infrastructure to support the existing area. let alone a new development akin to Kingswells, within the AWPR.

P Maclean

7.
Archibald Simpson House
27-29 King Street
Aberdeen AB24 5AA

t. 01224 625524
f. 01224 626596
www.nestrans.org.uk

nestrans

9th April 2014

Our Ref: KM/N14/1

Laura Robertson
Senior Planner
Masterplanning, Design and Conservation Team
Enterprise, Planning & Infrastructure
Aberdeen City Council
Business Hub 4, Ground Floor North
Marischal College
Aberdeen
AB10 1AB

Dear Laura

Countesswells Development Framework – Consultation Response

Thank you for the opportunity to comment on the Countesswells Development Framework. Nestrans welcomes the publication of this development framework and as the Regional Transport Partnership for the North East, our comments are focussed on the transport elements of the framework. We would like to make the following comments:

- Primary and secondary road layout and design – we have some concern that the layout of the primary road running through the development will encourage rat running through the development between the A944, the A93 and onto smaller roads into the city such as Countesswells Road, Friarsfield Road and Craigton Road which are not designed to cope with additional traffic. The design of the primary and secondary road layout should consider how rat running can be discouraged whilst also maintaining appropriate access to and within the development.
- Public transport provision – Nestrans welcomes that potential bus connections have been considered at this early stage and the inclusion of a bus gate onto the A944 creates a significant level of priority for buses. This priority should be continued through the junction at Kingswells by means of signal priority for buses. In order to positively influence the travel patterns of residents and those working within the site, and to maximise the benefits of the bus gate, public transport options need to be present from a very early stage of the development, recognising that it will take time for demand to increase.
- Nestrans also welcomes the statement that the '*Development Framework has been designed so that public transport can be accommodated from the south should operators wish to do so in the future*'. It is important that maximum flexibility for public transport provision to the site is maintained into the future so that opportunities for improving public transport provision at a later date are not prevented.
- Cycling and walking – The proposals for the maintenance and enhancement of the Core Path network and reference to shared use paths throughout the development are welcomed. In relation to accessing and crossing the A944 however, it is noted

that specific crossing facilities for cyclists and pedestrians will be provided at the upgraded Jessiefield / Bellfield access junction and that crossing of the A944 will be encourage via these facilities. It should however be recognised that employment and other facilities in Westhill and Kingswells will likely be important destinations for residents of Countesswells and are within cycling distance and potentially walking distance for some. Cyclists are unlikely to and should not be expected to use the Jessiefield junction in such instances as it would be a significant diversion and safe cycle and pedestrian crossing points should also be provided at the Kingswells junction. The creation of a bus gate will also make this route much quieter and its use as a cycle and pedestrian route should be actively encouraged.

- Parking - Nestrans would welcome consideration being given to the creation of car free or low car developments, support for car clubs and provision of car share parking bays in line with the policies of the Regional Parking Strategy which can be found at <http://www.nestrans.org.uk/regional-transport-strategy.html>
- We welcome the recognition of the requirements of the Strategic Transport Fund. As identified in the framework, contributions to the STF will be required in line with the policy set out in the supplementary planning guidance "Delivering Identified Projects through a Strategic Transport Fund".

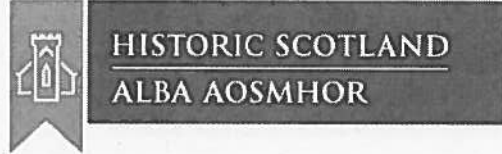
I hope that these comments are helpful in progressing the Development Framework to the next stage and thank you again for the opportunity to comment.

Yours sincerely



Kirsty Chalmers
Transport Executive (Strategy & Delivery)

8.



Laura Robertson
Senior Planner
Masterplanning, Design and Conservation Team
Aberdeen City Council
Business Hub 4, Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Direct Line: 0131 668 8960
Switchboard: 0131 668 8600
Andrew.Stevenson2@scotland.gsi.gov.uk

Our ref: LDP/A/2
Our Case ID: 201307578

23 April 2014

Dear Ms Robertson

**Countesswells Development Framework and Phase 1 Masterplan
Consultation**

Thank you for your consultation of 14 March seeking our comments on the above Development Framework and Masterplan. The following comments are based on our statutory historic environment interests. That is scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes and battlefields in their respective Inventories. You should also seek comments from your council's Conservation and Archaeology Services who will also be able to advise on the potential for significant impacts on the historic environment and of potential impacts and mitigation for any sites of regional and local importance.

I note that the framework and associated masterplan will not impact on any sites within our statutory remit. I can therefore confirm that we have no comments to offer.

Should you wish to discuss this response please do not hesitate to contact me on the above details.

Yours sincerely

Andrew Stevenson
Senior Heritage Management Officer (SEA)

9.

From: PI
To: [Laura Robertson](#)
Subject: FW: The Countesswells Development Framework and Phase 1 Masterplan
Date: 28 April 2014 10:41:19
Importance: High

From: Yumsie Mumsie [REDACTED]
Sent: 27 April 2014 21:44
To: PI
Subject: The Countesswells Development Framework and Phase 1 Masterplan
Importance: High

Dear Sirs

I am contacting you in response to the above. I am shocked that as an existing resident no notification of this particular consultation was received. I believe that there was something printed in the Citizen paper but owing to our location the properties at Countesswells House do not receive copies of this publication. We were therefore unaware of this consultation period although we were aware of the previous meetings that took place and are referred to in this Masterplan.

Whilst I am not against development I am struggling to understand the proposals surrounding the road infrastructure (item 5.4.5) and how this is going to be managed for us as existing residents in this area. I live at Countesswells House North (Listed Building - split into two properties some 30 years ago) and the history of the property suggests that Countesswells Road would have in fact been the driveway to the Estate and its properties. I have tried to study the numerous drawings and sketches but I am unclear exactly how we will be able to drive from our property to access Aberdeen if the proposal is to make Kirkbrae a public transport only corridor. This road is a very busy road and it is obviously the access for all the properties within the Countesswells House area (7 properties in total). The drawings do not provide any clarification on how we will be able to access our properties. Item 3.2.5 does not even show the Countesswells Area (7 properties) and whilst it is not within the red marked area we clearly are affected by this potential development and will require you to ensure accessibility to our properties be properly considered.

I would appreciate clarification on these matters.

Yours faithfully

Sheena Cooper - Countesswells House North, Bieldside, Aberdeen, AB15 9BT



CULTS BIELDSIDE AND MILLTIMBER COMMUNITY COUNCIL

CBMCC@CBMCOMMUNITY.ORG.UK

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

25 April 2014

Dear Sir,

Proposed Supplementary Guidance: Countesswells Development Framework and Phase 1 Masterplan

I am writing on behalf of the Cults Bieldside and Milltimber Community Council (CBMCC) to raise some concerns that need to be addressed relating to the Countesswells Development Framework and Phase 1 Masterplan before approval should be granted.

General

It is not satisfactory for Aberdeen City Council to seek comments on Planning Applications related to a Development Framework and Masterplan by a deadline which is earlier than the date set for comments on the Development Framework and Masterplan (initially by 17 April 2014 when date set for Masterplan comments is 29 April 2014; it is noted that the deadline for Application comments has now been revised to 30 April 2014).

Education

The Development Framework and Phase 1 Masterplan does not set out firm dates by which the first Primary school (PS01) and the Secondary school will be operational. This should be set out in the planning application and legal agreement, either a date or number of houses occupied. The timing should take account of the fact that Braeside Primary is proposed as an interim location and Braeside is currently being used to teach pupils from the recently closed Hamilton school.

The proposed Secondary school campus appears to be located under an existing high voltage power line. The safety aspects of this proposal for people using the campus, and construction, need detailed consideration and if necessary the campus should be relocated.

While we recognise the aim of Aberdeen Council is to encourage pupils to walk to school, there will be times when parents have to drive them to school and the school design should ensure an adequate drive-in and drop-off/pick-up area is incorporated.

Environment

We note that much of the planned greenspace runs under the existing high voltage power lines – the developer is not really justified in claiming this area as part of his contribution to green space provision.

The ownership and future management of the greenspace areas must be established as part of the legal agreement to ensure that the future maintenance is provided for and future residents are clear on how this will be delivered.

Peter Roberts, Planning Liaison Officer CBMCC
6 Marchbank Road, Bieldside, Aberdeen AB15 9DJ

██████████ - ██████████

While we recognise that the detailed plans may change, it appears some properties will be located directly adjacent to woodland e.g. S13, and this represents a safety risk from falling trees onto property. A clear safety margin should be preserved between housing and woodland.

We request that the Aberdeen City Council and Developer look at preserving more of the wetland area to the south west of the site, block S9, and turn it into an amenity area. An example of how this has been done successfully is in the Nexen office development at Prime 4, Kingswells. SUDS areas should be designed to be holding water at all times, to create an attractive appearance, rather than being left to stand dry in times of low rainfall.

There should be sufficient tree planting along the northern edges of the site to shield the development from view.

Housing

There is only a passing mention of the need to consider single storey housing for the elderly (ref. section 5.5.2, page 69 and 6.2.7 page 87 of the Development Framework and Phase 1 Masterplan). There should be a firm commitment to build bungalows with small garden areas to accommodate elderly and disabled people. It is recognised that these are likely to be best built when facilities such as shops and health services are available.

The quality and design of the proposed affordable housing should be of a high enough standard which would be acceptable to housing associations and encourage them to purchase properties. This has not always been the case.

There does not appear to be any mention of planned opportunities to take advantage of natural energy in the housing design e.g. the installation of solar powered water heaters, use of ground source heat pump arrangements or a central heating ring main. If these ideas are incorporated early on they can be installed at very low cost with significant energy saving potential.

Roads and Transport

The supporting documents for the development refer to the potential risk of lengthy closure of the Kirk Brae/C189 road due to construction and installation of utilities. This road is a key route for people travelling north to Kingswells, Westhill, the airport and other locations north of Aberdeen and we expect the Aberdeen Council to impose strict limitations on road closures of the C189 until the new link road to the Jessiefield junction is available for use. Road closures should not take place at peak travel times. An obvious way to avoid the risks of road closure is to build the new link road very early in the development. We expect the developer to coordinate activity with utility providers to minimise the amount of disruption.

The proposed route for the road to the Jessiefield junction appears to run through the western end of the remembrance garden at the Aberdeen Crematorium (ref. map page 61 and elsewhere). Given that many families will have spread ashes of loved ones in this area we feel it is inappropriate to route the road through the garden and it should be moved sufficiently west of the garden to minimise noise disturbance in the garden.

We suggest the Aberdeen City Council also reconsider the desirability of routing traffic moving South to North through the middle of the Countesswells development and to look at the value of having the main route running around the edge of the settlement.

Comments on the Countesswells Transport Assessment:

1. Generally very disappointed that the report is not proposing any imaginative solution to the travel needs of this new township. The only travel modes considered are the traditional and available bus and car modes supplemented by a desire to increase the use of bicycles. The latter being available only to the fitter section of the population and much affected by inclement weather conditions.
2. Rather than suggest a forward looking novel means of transporting the new residents to the city and places of work – monorail across Hazlehead? dedicated bus-road? tram? - it is

proposed to tinker with the overloaded junctions around the development to squeeze in the expected extra traffic. The report's calculations and its conclusions have failed to convince us that the travel from, to, through and around Countesswells will be without problems even after completion of the AWPR. Some details to illustrate our doubts are as follows:

- a) The 'committed developments' included in the base traffic loads do not appear to include the major new developments in Friarsfield and Oldfold Farm (see 8.2.3). The additional traffic from these areas has already been shown to overload some of the North Deeside Road junctions and cannot be neglected when evaluating a new town in the immediate vicinity.
- b) The model used seems overly optimistic. The check on its calibration reported in Appendix J - 1.2.2, table 3, shows that the observed maximum queue lengths are significantly longer than the modelled ones (8 vehicles instead of 1, and 10 vehicles instead of 3 to 4!!). On the basis of this comparison it can not possibly be concluded that the model is valid.
- c) It is doubted that simple signalling can return the performance of a junction that has been shown to have a Ratio of Flow to Capacity of 125% to acceptable levels – see Appendix J, 1.2.6 and 1.2.7. In previous submissions by Fairhurst it was explained that by agreement with the City a maximum RFC of 90% would be allowed for signalised junctions instead of the normal accepted standard of 85%.

Utilities

The provision of high speed broadband through fibre optic cable should be mandatory for the development and this should be part of the legal agreement with the developer.

Please contact me if you have any questions.

Yours faithfully,

Peter Roberts

Peter Roberts

Planning Liaison Officer

Copy to: Councillor Marie Boulton, Councillor Aileen Malone, Councillor Tauqeer Malik

Laura Robertson

From: PI
Sent: 28 April 2014 11:51
To: Laura Robertson
Subject: FW: Countesswells Development Framework and Phase 1 Masterplan - Statutory Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

From: Lesley Logan [<mailto:Lesley.Logan@jmp.co.uk>]
Sent: 25 April 2014 11:17
To: PI
Cc: Jason Gillespie; Malcolm.Forsyth@transportscotland.gsi.gov.uk
Subject: Countesswells Development Framework and Phase 1 Masterplan - Statutory Consultation

FAO Laura Robertson

Dear Laura,

We refer to the above Consultation request issued to Transport Scotland which has been passed to JMP (as their Term Consultant) to comment. Transport Scotland welcomes on the opportunity to comment on the assessment of development sites throughout the planning process.

The Consultation relates to a Masterplan for 3000 houses and 10 hectares of employment land plus appropriate community facilities at Countesswells, Aberdeen.

Transport Scotland's primary consideration will be the potential impact these proposals will have on the safe and efficient operation of the A90(T) trunk road.

The Masterplan makes reference to a completed Transport Assessment that has been prepared for the proposed development, indicating that this addresses access and transport aspects, and suggests infrastructure improvements to mitigate against the traffic impact on existing junctions and links. The Masterplan does not provide any detail relating to this mitigation or of the proposed access strategy.

We would confirm that whilst TS did receive a very preliminary version of a TA scoping report from Fairhurst in April 2012, this was largely incomplete and as such it was not possible to confirm agreement on the TA methodology at that time. It is noted that ACC reached a similar view and did provide a formal response to Fairhurst on 11 May 2012 advising that further detail was required.

We would confirm that TS has received no further information relating to the TA in the intervening period, although it is noted that a TA has now been submitted in support of the current planning application for the site. We have not yet had the opportunity to review this and it will therefore not be possible to comment on the potential impact the development will have on the trunk road until this process is complete.

Regards
Lesley Logan
Senior Transport Planner
JMP Consultants Ltd, 250 West George Street, Glasgow G2 4QY

[D] 0141 226 6942
[T] 0141 221 4030
[F] 0800 066 4367
[W] <http://www.jmp.co.uk>

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Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Laura Robertson
Masterplanning, Design and Conservation Team
Planning and Sustainable Development
Enterprise, Planning & Infrastructure
Aberdeen City Council
Business Hub 4
Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB
[By email]

22 April 2014
Our ref: CPP129880
Your ref: E-G8/36

Dear Laura

Countesswells Development Framework and Phase 1 Masterplan: Statutory Public Consultation Countesswells Habitats Regulations Appraisal

Thank you for letter of 14 March 2014 informing us of the above consultation.

We support the aspiration to create Countesswells as a new place with its own character and identity. Carefully designed open space can make an important contribution to Countesswell's sense of place. We welcome the consideration that has been given to open space and access throughout the framework and masterplan. We broadly support the measures proposed and make several recommendations to augment this in the attached annex. We also make recommendations to enhance the benefits for biodiversity.

Habitats Regulations Appraisal (HRA) – River Dee SAC

An HRA is supplied. While we agree with this in general, we advise that further consideration is needed of mitigation for the potential impacts of water abstraction. Water to supply the proposed 3000 new houses and employment area will be abstracted from the River Dee. Reductions in water levels, particularly at times of low flow conditions can have impacts on freshwater pearl mussel, one of the qualifying features of the SAC.

The recently approved Aberdeen City and Shire Strategic Development Plan (SDP) considers this issue and contains measures designed to avoid any likely significant effects on the SAC. The HRA for the SDP includes safeguards such as:

- Lower-tier plans and strategies should undertake HRA and EIA to ensure that adverse effects are fully mitigated.
- The Council to agree with relevant bodies any appropriate mitigation measures to ensure that water abstracted from the River Dee will not affect qualifying interests.



We draw attention to Section 4.17 of the SDP which states that the River Dee is under pressure and as a result, managing the use of water and increasing water efficiency is vital. The SDP also contains a target for all new developments to use water-saving technology. To achieve this, local development plans and other supplementary guidance will encourage water efficiency and water saving measures in all relevant developments, to meet the Council's legal responsibilities in relation to the River Dee SAC.

In line with the findings of the HRA carried out for the SDP we advise that if a statement encouraging water saving technologies and water efficiency is included within the development framework and masterplan then this significant effect can be avoided and an appropriate assessment will not be required. A Water Efficiency Statement will be required in each subsequent planning application detailing the measures employed to demonstrate that they would not have a significant effect on the qualifying interests. These could be to achieve the gold standard for water use efficiency for domestic buildings and BREEAM level 5 for non-domestic buildings, in accord with the preferred option identified in the Aberdeen local development plan Main Issues Report, January 2014. The Ciria publication 'Water sensitive urban design in the UK: Ideas for built environment practitioners', 2013, may also provide helpful guidance.

Finally, we note that there is a simultaneous consultation on an application for planning permission in principle and a detailed application on the infrastructure for the Phase one area. We expect that the development framework and masterplan are finalised and approved before those applications are determined so that the framework and masterplan provide a basis against which they can be assessed, especially with respect to potential impacts on the River Dee SAC, as outlined above.

For further information or advice in connection with this proposal please contact Sue Lawrence at this office or sue.lawrence@snh.gov.uk.

Yours sincerely

Ewen Cameron
Operations Manager
Tayside & Grampian

Annex

The Development Framework

Sustainability issues

As advised in the main letter, the framework should include a statement encouraging water saving technologies and water efficiency in order to prevent a likely significant effect on the River Dee SAC from water abstraction.

Area of the Site

The development framework shows two additional areas to the north-west and north-east of OP58 in order to create routes to the Jessiefield and Kingswells junctions on the A944. Consideration should be given to reducing/removing the requirement for one of the new roads to pass through woodland.

Landscape Strategy and Open Space

Open Space Concept

We broadly concur with the open space concept and particularly support the key principle (5.2.1) to create landscape corridors through the development to connect the green spaces at Hazlehead and Countesswells. We agree that if carefully designed, this would enhance the ecological and recreational network in the area.

We recommend that:

- There should be at least one band of woodland planted to connect Countesswells and Hazlehead woods.
- The area of peripheral greenspace is reduced and used instead internally within the framework and masterplan site.
- The area of Central park is increased so that it meets the requirements of a Major Open Space and acts as a focus for the community.
- Consideration is given to the quality requirement for open spaces.

There is woodland present to the east and west of the site in Hazlehead and Countesswells and we advise there could be strong ecological benefits from creating a swathe of woodland to connect these. In particular, these woodlands are used by red squirrel, a priority species of conservation importance in the north-east local Biodiversity Action Plan that would benefit from a woodland corridor. In the framework the woods are connected via the Cults burn corridor. While the framework includes some riparian tree planting in the Cults burn corridor, it doesn't provide for an actual woodland link. We advise that the west-east section of this corridor should be expanded to clearly create woodland and along the core path link. Even a band 10m wide (3-4 trees) would be sufficient to benefit red squirrels. This would also be in keeping with the council's green space network which shows a broad corridor of greenspace in this area as part of site 32 which links Hazlehead and Countesswells woods.

As this site is surrounded by greenspace and green belt there is less need for peripheral spaces other than for landscaping. Reducing the area of peripheral greenspace could allow more greenspace to be allocated to woodland corridors and Countesswells Central Park (see below).

It is not clear that either the Cults Burn Corridor network or the School campus/community sports facilities would meet the requirement for a Major Open Space as described in the council's open space supplementary guidance. We recommend that consideration is given to increasing the size of the Countesswells Central Park so that it meets this requirement. Increasing its size would also allow it to meet the range of uses described for the park in

section 5.7.5 of the development framework. Its central location is also more likely to be accessible to the majority of residents and provide a focus for the new community.

The framework states that further small areas of open space will be located through the development to connect the strategic spaces. We recommend that the framework is amended to provide more clarity on the quantity and location of these spaces. This would help ensure that these are included in the masterplans that are subsequently produced.

Quality of the open spaces is also an important factor and we advise that the spaces in the development should be designed and maintained to meet the criteria specified in the council's supplementary guidance. The council's Open Space Audit, 2010, found that the quality of amenity open space scored poorly and we recommend that measures are taken to prevent this from being the case for the proposal at Countesswells.

The results of the Scottish Household Survey (2012) undertaken by the Scottish Government, show that only 31% of people in Aberdeen visit their local greenspace more than once a week, one of the lowest scores in the survey. We recommend that the greenspace at Countesswells is designed so that the residents want to visit it more frequently than this.

We note that Countesswells road will be closed as a road within the development site (cf 5.6.6 and 5.7.7) and become an area of open space. For clarity, we advise that it will need to be redesigned accordingly rather than retain the existing road surface.

Opportunities for Biodiversity Enhancement

The Landscape strategy section of the framework (5.2) states that new diverse habitats will be planted for site wide biodiversity enhancements. It provides a table showing the enhancements proposed; these are located along the Cults burn corridor and in Hazleden park.

We support these measures and recommend that the development framework and masterplan are amended to increase the benefits to biodiversity through the design of the open spaces and also the buildings themselves:

- Wildflower planting. This is proposed at Hazelden and could be extended to other parks as areas of species rich grassland or meadow. Not only can these be attractive areas, they requires less frequent cutting than typical amenity grassland. The framework states that grassland areas at Hazelden park will provide foraging opportunities for a range of species. We advise that short mown grassland in itself is likely to be of very limited benefit.
- Nectar rich species of plants. These could be planted to benefit bees in residential and business areas of greenspace, and in Meadowbanks and Wardhead parks.
- Use of green walls or green roofs. This approach which can enhance biodiversity, aid management of water run-off and add aesthetic value, is included in guidance provided by the Landscape Institute¹.
- Planting of street trees. Not only can this add aesthetic quality, but reduce airborne pollution, provide shade, mitigate wind chill and turbulence, reduce urban heat island effects and increase biodiversity.
- Provision of swift bricks, swallow and house martin nest cups and bird boxes.

¹ Green Infrastructure: An integrated approach to land use – Landscape Institute Position Statement 2013

We note that a Landscape Strategy will be produced to show the species mix to be used in the development. We recommend it is made clear when this would be produced, for example whether it would accompany further masterplans or detailed planning applications.

Access and Connectivity Strategy

We broadly welcome the proposed path network and statements that these must be safe, pleasant and attractive.

Pedestrian and cyclist connectivity

We support the proposal to actively encourage walking and cycling as viable transport options and recreational pursuits. In order to achieve this there will need to be appropriate cycling routes *outwith* the development site. The A944 to the north and A93/Deeside line to the south are some distance from the site. The Countesswells road is likely to be the closest and most direct option for the majority of residents at Countesswells, and consequently a preferred route that would be used. This road is currently narrow with poor surfaces towards its outer edges. We recommend that consideration is given to addressing these issues and making it a safe route for cyclists. This might best be achieved by a new cycle path parallel to but separate from the road. The route to the south, Kirk Brae, is also narrow and winding. Consideration should be given to how this could be made safe and attractive for cyclists.

While largely outwith the development site, this is an important infrastructure consideration needed to realistically promote cycling and ensure it is safe and therefore should be considered within the development framework.

Junctions to A944

We note the layouts of the junctions have been fully analysed to ensure they are appropriate for pedestrians and cyclists. We welcome this consideration. For the sake of clarity, a separate and segregated cycle lane should be created along the new road leading from the development to this junction.

Street Hierarchy

Both primary and secondary streets would have cycleways on only one side of the street and that would be combined with a footway. We advise that careful consideration will be needed to determine if this is a practical arrangement and that cyclists would be able to cross roads safely where necessary.

In addition, the meaning of the following text for secondary streets is not clear: 'The secondary streets should provide a segregated 3m wide foot and cycleway to one side of the carriageway with a 2m wide footway on bus routes and where they connect key destinations and connect to the external path network.' Does this mean there will not always be a cycleway on secondary streets?

It is unclear why some proposed secondary streets, such as those around N2-N4, N& and N10, S10 and S11 are not shown as having dual use pavements in figure 106 despite the description of these streets in 5.4.6.

Character areas

This structural planting proposed along the Northern Edge area should have soft and varied edges so that it appears naturalistic from all directions and adds aesthetic value.

We support the proposal to incorporate direct footpath connections to the community core for the Hazlehead character area and recommend this is added to all the character areas.

The Phase 1 Masterplan

Sustainability issues

As advised in the main letter, the masterplan should include water saving technologies and water efficiency in order to prevent a likely significant effect on the River Dee SAC from water abstraction. This could be to achieve the gold standard for water use efficiency for domestic buildings and BREEAM level 5 for non-domestic buildings, in accord with the preferred option identified in the Aberdeen local development plan Main Issues Report, January 2014.

More consideration could also be given to other sustainability issues such as energy efficiency, for example, through the layout and orientation of buildings.

Masterplan guidance

We note that the illustrative masterplan is not definitive and used to illustrate one possible interpretation of the Phase 1 masterplan principles. While design principles are provided for each block, it is not possible to comment on the final provision and design of open spaces (including further small areas of open space) footpaths and cycleways without this information.

Biodiversity measures

Please see our comments above on the Development Framework.

Pedestrian/cycle and equestrian connections

There should be consideration of cyclists between N6, N7 and N10 and C6 and C7. Please see also our comments above on the Development Framework.

Countesswells central park

We recommend that the area of Countesswells central park is increased to meet the requirements of the council's development framework for a major park. It would also enable it to fully address the functions set out in 6.5.1. Please see also our comments above on the Development Framework.

Cults burn corridor

We welcome the proposal to realign and naturalise the water course, and to include areas of wetland habitat which will be managed with an ecological bias. These should have positive benefits for biodiversity.

We also advise that the west-east section of this corridor that links Countesswells and Hazlehead woodlands, should be expanded to create a swathe of woodland. Even a band 10m wide (3-4 trees) would be sufficient to benefit the red squirrels that live in these woods. A similar band could also be added to the core path link. Please see our comments above on the Development Framework.

We note that several bridge crossings are proposed over the Cults burn. The design of these bridges is important for landscaping and to help develop a sense of place.

Design standards

We note the quality of open space will be controlled through design guidance as part of future sales agreements. We recommend the principles of this guidance are included in the masterplan(s) and subsequent planning applications.

Countesswells Development Framework & Phase 1 Masterplan
Response on behalf of **sportscotland**

Putting sport first

sportscotland
the national agency for sport

Introduction

sportscotland is the national agency for sport. Our vision is a Scotland where sport is a way of life. We share in the vision from 'Let's Make Scotland More Active – A strategy for physical activity' that 'by 2020 people in Scotland will be enjoying the benefits of an active life'. This is intrinsically linked to the 5 strategic objectives that unite all public organisations in the country: wealthier and fairer, smarter, healthier, safer and stronger and greener. The availability of a network of places, of the right quality and capacity to meet the needs of sport, is crucial to deliver these objectives.

sportscotland has a statutory planning role as set out in Scottish Planning Policy (SPP), in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and Circular 3/2009 *Notification of Planning Applications* in relation to outdoor sports facilities, and playing fields and pitches.

We support and advise Councils and Trusts on the preparation of Sports Facility and Pitch Strategies, including the provision of financial support towards the cost of their preparation. Undertaking these strategies, potentially as part of a wider open space strategy, can make an important contribution to the local development plan process and we encourage their preparation. Aberdeen City Council are currently undertaking these and we would encourage that emerging Development Frameworks link in with the findings of these wherever possible to provide spatial frameworks which deliver the sports requirements of the city and new communities.

In relation to this, **sportscotland** can undertake Facility Planning Modelling for various sports facilities, we have done this for sports halls in Aberdeen and are undertaking this for swimming pools. This can assist in the identification of potential deficiencies in facility provision in an area as well as assisting in identifying the sports facility requirements of development proposals.

sportscotland has produced a number of documents which can contribute to the preparation of Local Development Plans, Development Frameworks and Masterplans, particularly where there is new development proposed. Guidance includes *School Playing Fields – Planning and Design Guidance*; *Secondary School Sports Facilities – Designing for School and Community Use*; *Primary School Sports Facilities* and *Pitches and Pavilions*. These are available in the Facilities section of our website.

sportscotland also has a remit for sport and physical recreation in the countryside/outdoors. Our position on sport and recreation in the outdoors is set out in our policy document *Out There*. *Out There* sets out a number of policies relevant to the planning of sport and recreation in the outdoors and is available on our website.

sportscotland has endeavoured to identify all outdoor sports facility sites that may be impacted by future development proposals using aerial imagery, although there may be some that we have missed. The Council should therefore note the provisions of Scottish Planning Policy (SPP) Paragraph 156 with regard to the loss of playing fields and sports pitches, and the circumstances as set out in the Development Management Regulations, under which **sportscotland** should be consulted on planning applications affecting outdoor sports facilities.

Our comments on the Development Framework for Countesswells are provided below. For clarity, we have grouped comments thematically. **sportscotland** would be pleased to work with the Council to discuss any part of our representation further.

Impact on existing outdoor sports facilities

Consideration requires to be given to the sports uses in the surrounding area, and what mitigation will be needed, to ensure continued access to these facilities and protection of user amenity.

Neighbouring the site to the east, Hazlehead Park contains a number of formal outdoor sports facilities including golf courses, tennis courts, a horse riding school, sports pitches and a network of paths used for walking, cycling and horseriding. Hazlehead Swimming Pool, at Hazlehead Academy to the north of the park, is a 25 metre pool open for community use. Some 2 miles to the south of the site, Cults Sports Centre at Cults Academy a 25 metre swimming pool. Both schools also have other sports facilities.

Hazlehead Park is referenced within the Development Framework, which focuses on providing good connections between the site and these existing resources and we welcome this aim.

There is no specific reference to Hazlehead Golf Course which is located directly adjacent the southeast of the site boundary. Any future development on the site would need to be designed to ensure no conflict between users and that the use of the golf course would not be affected. **sportscotland** recommends that as the design guidance and proposals are forthcoming for the areas neighbouring the golf course, the inclusion of mitigation, such as landscape buffers, may be required to assist in protecting the future amenity of all users.

Loanhead Equestrian Centre will not to be retained as part of the proposals. **sportscotland** is not a statutory consultee in respect of this land use but we would request that consideration is given to the requirements of this sport and whether remaining equestrian centres in the area can accommodate demand.

Given the scale of growth in the number of local residents that would result from the delivery of the Countesswells proposals, there is likely to be an associated increase in use of the existing sports facilities in the area. It is important that existing facilities are not put under undue pressure from demand. **sportscotland** recommends that consideration is given to any upgrade and improvement works to these facilities, in particular at Hazlehead Park, as appropriate and by way of developer contributions or legal agreement, to ensure facilities have capacity for both existing and future users.

Walking, cycling, core paths and access

sportscotland supports the aspirations to integrate the strategic path network into the settlement and to encourage cycling and walking throughout the area. Surrounding woodlands (including Countesswells, Foggieton, Kirkhill) are multi-activity forests with trails suitable for walking, cycling, running, horse riding and orienteering. It is important that the different needs of the variety of users is recognised in the detail of design proposals and **sportscotland** would support the inclusion of a design principle that reflects this.

Similarly, **sportscotland** supports the commitment to provide opportunities for active travel throughout the Development Framework document. The provision of paths and the planning for these should, however, consider their use for sports as well as active travel, while similar they are not the same. It is important not to develop active travel in isolation from recreational walking and cycling and to aim to develop an integrated network that joins recreational and commuting routes. Provision for functional cycling or walking is in most cases also provision for recreational cycling and walking (and vice versa), both sorts of provision should consider the needs of both types of users.

In addition, the amenity of all pathway users must be protected throughout the phased construction and operation of development. While obstruction of pathways should be minimised at all stages; safe, direct, accessible temporary path diversions should be provided during periods where existing pathways are inaccessible.

Level of proposed sports provision

New residential development will have implications in relation to the demand for sports facilities and could potentially create the need for new ones. The encouragement of/provision of opportunities for sport and recreation should be embedded in masterplans in order to provide for a good level of access to sports facilities for those living in the area.

In calculating the level of sports areas, there is an identified requirement for 1.6ha per 1000 persons of space for outdoor sports (table on page 57). This would equate to 11 hectares (based on stated population of 6,810). The table states there is a requirement for around 14 hectares of outdoor sports provision, but it is unclear how this has been calculated.

The areas identified as providing for outdoor sports use are Hazledean Park (2ha), Central Park (2.6ha) and the School Campus (6.5ha) which total some 11 hectares. However, there is no mention of Hazledean Park providing for formal sports facilities in the rest of the document and the Central Park area will not contain outdoor sports facilities alone, therefore the amount attributed to this area would be lower. At present, the total area attributed across the site does not appear to meet the requirement.

There is no mention made of the primary school to the north of the site and it is assumed that this will have pitches provision that can be used by the community.

Both school areas, ie the campus and primary school, show provision of SUDs within the sites. This will affect the available area for outdoor sports facilities and it should be ensured that sufficient are provided, again, our guidance provides good practice information in relation to this.

In relation to the sports facilities associated with the school campus and Hazleden Park, it is noted that overhead lines cross this site. Given the location of these this may affect how the area can be used and consideration needs to be given to this and what the implications are for delivery of sports facilities.

sportscotland would suggest that further consideration be given to the level of outdoor sports pitch area that will be required to serve the residents. While we do not think a quantities target is always required, particularly where surrounding existing facilities may have capacity (or could be increased in their capacity) to meet some of it would be beneficial if the required level of outdoor sports facilities provision could be clarified. The identification of sufficient provision within the Development Framework document will assist in ensuring delivery of facilities to meet the needs of a new residential community at Countesswells.

This should consider the wide range of sports uses, not just pitch based sports, and should also consider the requirements for indoor provision – sports halls etc. Given the scale of development, it will be essential that in addition to pitches, the indoor sports facilities at the secondary school provide for community access, and careful consideration will require to be given to the design to accommodate this.

Phasing

sportscotland support the inclusion of general community facilities, to include sports facilities, within Phase 1 of the Masterplan. Early delivery of infrastructure and services is essential in helping to establish new communities. Sports facilities associated with the new primary school proposal and those within the Central Park will be delivered at this stage. **sportscotland** supports the dual-use of school sports facilities and advise that these be designed to enable community access both during and outwith school hours .

As previously mentioned, **sportscotland** have produced good-practice guidance regarding the appropriate level of sports facilities provision for new schools (both primary and secondary) as well as being able to assist in the technical design requirements for outdoor sports facilities. We request that this guidance is used at the point that design principles and proposals are being developed for school sites and sports facilities at Countesswells in order to ensure that the design is optimised for school and community use.

It is noted that 2, 3 stream primary schools are proposed. The sports facilities requirements for these, in order that P.E. can be delivered, are more than a single stream school, and we refer again to our guidance which outlines the requirements for these.

Both Phases 2 and 3 refer to the completion of the Community Campus. The completion of the schools is referred to in Phase 3. Given the anticipated residential capacity of the site by Phase 2 (some 2,013 units), **sportscotland** would encourage that the detailed phasing of the later stages secures the delivery of the majority of associated sports facilities is in advance of Phase 3. This will ensure adequate facilities are in place for residents. Throughout construction and operation of later phases of development, provisions should be in place to maintain continued access to sports facilities delivered in the earlier phases.

Phase 1 Masterplan

Core Path Links - Although 'illustrative' in nature, the Core Path 57 alignment and the Core Path Link are shown within the masterplan as wide, landscaped, linear parks. **sportscotland** supports any improvements to the Core Path and associated links. The delivery of these elements as high quality, flexible and accessible open spaces will be important in both encouraging the use of these key routes for active travel as well as recreational walking, cycling, running and horse riding by the local community, and to ensure they contribute positively to the wider path network. It is important these spaces are not only well-designed but are appropriately integrated to the phasing program with management plans in place to ensure opportunities for outdoor recreation are optimised for the local community.

Countesswells Central Park - **sportscotland** supports the proposed location of the outdoor sports facilities within the Central Park area as this provides an accessible, central resource for future residents. In determining the type of facilities to be provided here, due regard should be given to the specific needs of the new community. Again, we would encourage use is made of **sportscotland's** published design guidance to assist in the development of sports facilities and ensure these are optimised for community use.

Core Spaces Design Principles - **sportscotland** support the reference to the inclusion of sports facilities as both a 'function' and 'design principle' for this area. However, we would recommend a consistent approach to the wording of these; while the illustrative image is annotated, '*The park must contain a range of facilities for formal sports*', the design principle states, '*Areas for formal sports such as tennis courts, basketball courts and bowling greens should be provided, designed as part of the space*'. We encourage the former use of 'must' gives greater onus on the requirement to include and deliver these elements.

Infrastructure delivery

It is noted that the Delivery Statement is indicative at this stage to be finalised through the Planning Permission in Principle and Section 75 Agreement.

The Delivery Statement does not identify the need for any contributions required specifically for sports facilities. The need for education provision is included which references general 'community facilities / community learning hub' to be provided in association with these. It is noted that the secondary school will be built by ACC with developer contributions made, the details of which will be through the Section 75 agreement. Less clarity is provided with regard the delivery of the primary schools as ACC reviews its future educational capacity. For clarity, **sportscotland** would request that specific reference is made to sports facilities to be delivered alongside the schools as part of these community facilities.

In relation to the sports facilities to be delivered outwith the schools sites, **sportscotland** would request further clarification as to the intended delivery process for these elements.

For 'Walking/Cycling', the Delivery Statement states that it is more appropriate for contributions to be made to the local Core Path network within the site through development proposals rather than towards the 'Aspirational Path 10' in the Core Paths Plan. **sportscotland** supports the broad aspirations for core path linking, pathway networks and the illustrative approach of the landscape strategy set out in the document. It is understood that these are to be delivered through development proposals and associated Section 75 agreement. **sportscotland** would support this approach, incorporating these elements in the legal agreement provides a robust delivery mechanism.

We would refer to our earlier comments in terms of ensuring the future path network provides for both functional and recreational access. The path network should connect successfully both internally and with the existing surrounding path network to provide a joined-up network through each development phase.

Thank you for your consultation on the Countesswells Development Framework and Phase 1 Masterplan document and please contact us if it would be helpful to discuss our comments further.

sportscotland
Doges
Templeton on the Green
62 Templeton Street
Glasgow
G40 1DA

28 April 2014

Contact: Lorraine Jones 0141 534 6530, email Lorraine.jones@sportscotland.org.uk

From: PI
To: [Laura Robertson](#)
Subject: FW: Countesswells Development Framework
Date: 29 April 2014 09:24:41
Attachments: [IMG9745.jpeg](#)
[IMG9746.jpeg](#)
[IMG9748.jpeg](#)
[IMG9751.jpeg](#)

From: fred dalgarno [REDACTED]
Sent: 29 April 2014 09:18
To: PI
Cc: [REDACTED]; Kapil Kumar
Subject: Countesswells Development Framework

Dear Sirs

We write to make representations in respect of the above.

While we continue to believe that the development of 3,000 homes, schools and business space on the site is excessive, we understand that the decision has been made and the site is now included in the Local Development Plan (2012). The effect is that we, along with other residents in the area, will be living in a huge construction site for many years to come. We do believe, therefore, that the developers and Aberdeen City Council have a responsibility to current residents in the area to ensure that the impact on their daily lives is minimised as far as possible.

Accordingly, we wish to make the proposals set out below for the following reasons:

1 Throughout the LDP consultation process, we and others argued that the scale of development proposed for Kingswells, Cults, Hazelwood etc was excessive and should be undertaken only when appropriate infrastructure as in place including the construction of the AWPR. Particular reference was made to the impact on traffic including "pinch points" at a number of junctions on Anderson Drive.

2 During the lengthy construction period of the amended layout of the roads and roundabout at the Kingswells junction on the A944, the residents in this area suffered considerable inconvenience with road closures almost every weekend with, on many occasions, the information relating to these closures bearing no resemblance to what the actual closures.

3 The completion of the work on the roundabout (leaving aside the confusing road markings) has improved traffic flow east and west along the A944. Since the occupation of three large office blocks at Prime Four, however, traffic on the road to/from the roundabout to/from Cults/Bieldside has increased enormously particularly between 4.30 and 6.30pm but also at other times of the day. Access to and egress from our properties has become extremely difficult but, more important, should the need arise during these periods for an emergency vehicle to attend an accident or any of the properties along that road, there is no scope for those vehicles to get through the traffic. This situation will be exacerbated substantially when further office blocks and the hotel at Prime Four and the proposed office block at Ardene Veterinary Surgery are opened. (See the attached photographs taken between these times yesterday).

We request, therefore, that the following conditions are imposed on any development

within the Countesswells development:

1 The proposed roads and infrastructure works are carried out before any properties are built or occupied in the development and

2 No properties are built or constructed until the AWPR is complete as was the recommendation in the previous LDP.

Yours faithfully

Mr & Mrs F G S Dalgarno, Newton of Countesswells
Mr & Mrs G Copland, Newton of Countesswells Steading
Mr & Mrs K Kumar, Newton of Countesswells Farm



Litmus
PROPERTIES

Paul Williamson
Senior Planner (Development Management)
Planning and Sustainable Development
Enterprise Planning and Infrastructure
Aberdeen City Council
Business Hub 4, Ground Floor North
Marischal College
Broad Street
Aberdeen, AB10 1AB

28th April 2014

Dear Sir

**R & M Mann and the Mann Family – Bellfield Farm, Kingswells, Aberdeen
Countesswells Development Framework and Phase 1 Masterplan**

This Response is submitted on behalf of R & M Mann and other members of the Mann family (hereafter referred to as “our client”) and relates to the Countesswells Development Framework and Phase 1 Masterplan approved for consultation purposes by Aberdeen City Council (ACC) on 13 March 2014. The Framework and Masterplan was prepared by a design team appointed by the Countesswells Consortium and it is issued for consultation purposes by ACC with the intention of ACC adopting it as formal Supplementary Guidance (SG) as part of the Development Plan.

The Response to the Framework and Masterplan on behalf of our client is structured as follows:

- commentary is provided on the material included in the ACC Committee Report of 13 March 2014 which requested the approval of ACC Members of the Enterprise, Strategic Planning and Infrastructure Committee (ESPIC) to release the Framework for statutory consultation purposes;
- commentary is provided on the consultation process involved in the preparation of the Framework;
- commentary is provided on the Transport Assessment purportedly submitted in support of the Framework, but not actually forming part of the formal consultation on the supplementary guidance;
- commentary is provided on detailed matters included within the Framework.

A brief summary of some of the key issues my clients wish to highlight:

- The references in the Enterprise, Strategic Planning and Infrastructure Committee (ESPIC) report, and throughout the Development Framework, to land required for access to the A944 to the north of the OP58 allocation fails to adequately highlight that this land is both Green Belt land and that it includes part of the Hazlehead Cemetery Garden of Remembrance.

- The indicative route of the access roads between the A944 and the OP58 site do not need to be illustrated in the Development Framework and Phase 1 Masterplan, and given the uncertainties associated with the routes and the capacity of the Jessiefield and Kingswells junctions they should be omitted. Instead the Framework should refer to a requirement for two accesses to be provided from the OP58 site to the A944 and for two all-vehicle junctions to be provided on the A944 at Jessiefield and at Kingswells.
- The proposed re-routing of the access road through the the Garden of Remembrance/Hazlehead Cemetery would not have been apparent at any of the public events in 2012, when the access road was routed through agricultural land to the west of the cemetery site, and the ESPIC Members would not be aware of this very significant change from the Committee report, neither would the people who were “consulted” as part of the process.
- Such limited consultation and limited publicity associated with the current version of the Development Framework is unlikely to meet the “adequacy test” set out at Regulation 27 (1)(a) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008, in relation to publicity associated with proposed supplementary guidance.
- The TA that purports to support the Framework is based on outdated scoping, and makes no assessment of the acceptability of the Jessiefield and Kingswells junctions. Indeed the Jessiefield junction referred to in the TA is different to the junction proposed in the Framework. The TA cannot be relied upon in its current form to support the approval of the Framework as supplementary guidance.
- A further round of consultation on the proposed supplementary guidance, including access to the full list of documents referred to in paragraph 1.5 of the Masterplan document, should be instigated prior to the reporting back of the proposed statutory guidance to the ESPIC.

Committee Report – 13 March 2014

1. For the avoidance of any doubt, our client is entirely supportive of the opportunity, vision and detail set out in the Framework as it relates to the site allocated as OP58 in the adopted Aberdeen Local Development Plan (LDP) in 2012. In this regard, our client has no concerns with the detail referred to in the Committee Report as it relates to the OP58 allocation itself.
2. Our client has, however, very significant concerns regarding the references in the Committee Report and throughout the Development Framework to land required for access to the A944 to the north of the OP58 allocation, as though this land was included within the allocation in the adopted LDP. In particular, our client is concerned that the ESPIC was not adequately alerted to the fact that land to the north of OP58 is included within the overall consultation and that this land includes part of Hazlehead Cemetery. In particular, the Development Framework includes an indicative access to be taken through the Garden of Remembrance associated with Hazlehead Crematorium, located within Hazlehead Cemetery.
3. Paragraphs 5.13 to 5.17 of the Committee Report make reference to Access and Connectivity, but there is no reference within these five paragraphs either to the land required for access to the OP58 site between the A944 and the site itself, or to the requirement for the main vehicular access into the OP58 site to be taken through the Hazlehead Garden of Remembrance.
4. Paragraph 5.16 refers to the “*main vehicular connection to the A944*” being from Jessiefield junction – there is no reference, however, to the road line linking the OP58 site to the junction itself and this line is shown within the Development Framework as passing through the Garden of Remembrance.

5. Paragraph 5.17 states that a Transport Assessment (TA) is currently being prepared to “*determine the level of development that can be accommodated on the road network prior to the Jessiefield junction upgrade*”. In approving the Development Framework for consultation purposes, Members of the ESPIC sensibly reserved their position in relation to the proposed road infrastructure until the TA has been completed, and agreed only to determine the capacity of development at the OP58 site, prior to the delivery of the AWPR, through the TA process. Members required further detail on this, including a phasing plan, to be reported back to a future ESPIC.
6. The Development Framework and Phase 1 Masterplan, issued for consultation purposes, includes a large amount of information and detail. Once approved as supplementary guidance, any departure from the document will represent a departure from the Development Plan. With regard to the route of the access roads from the A944 to the OP58 site, these are shown indicatively within the Framework and the current indication, as included within the consultation draft, is that the Jessiefield junction would be served by an access road passing through the Hazlehead Cemetery and, in particular, the Garden of Remembrance associated with the crematorium.
7. It is our client’s position that the indicative route of the access roads between the A944 and the OP58 site does not need to be illustrated in the Development Framework and Phase 1 Masterplan, particularly given the uncertainties associated with the routes and the capacity of the Jessiefield and Kingswells junctions. Instead the framework should refer to a requirement for two accesses to be provided from the OP58 site to the A944 and for two junctions to be provided on the A944 at Jessiefield and at Kingswells. Including indicative routes of these access roads at this stage is premature and causes uncertainty and confusion for future planning applications on the basis that an application that includes the line of the road departing from that included within the approved supplementary guidance would be contrary to the supplementary guidance and therefore contrary to the Development Plan. This is an unsatisfactory position, given that further detailed work is currently ongoing through a TA which is likely to generate the optimum solution for access to the OP58 site from the A944 and this work should not be prejudiced by the premature approval of road lines through the Framework, and its subsequent approval as supplementary guidance.
8. In addition to these specific concerns regarding the Committee Report, the following comments are made:
 - there is no reference to the access to the site required from the A944 having to pass through an area of designated Green Belt;
 - there is no reference to opportunity site OP68 (Skene Road, Hazlehead) which designates an extension to the Hazlehead Cemetery;
 - there is no reference in the Report to the impact of the proposed A944 accesses on the Green Space Network – the impact on the Network can be significantly improved by routing the eastern-most access road to avoid the Green Space Network and this issue can be addressed at the detailed planning application stage rather than through the Development Framework;
 - whilst significant public consultation was undertaken in 2012 in relation to the Framework, only one meeting of the “Liaison Group” has taken place since November 2012 (on 2 February 2014, as referred to at paragraph 5.42). As such, it was only at the February 2014 meeting that the proposed re-routing of the access road through the Hazlehead Cemetery may have been apparent, representing a very significant change since the proposals were exhibited at a number of events in 2012 when the access road was routed through agricultural land to the west of the cemetery site. The ESPIC Members would not be aware of this very significant change, nor the limited consultation on this change, from reading the Committee Report. Further commentary is provided on this issue below.

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Consultation

9. Turning to the Development Framework and Phase 1 Masterplan document itself, the approach to consultation is set out extensively at paragraphs 2.5 to 2.9 of the Framework. It is clear from a review of these paragraphs that the majority of pre-application consultation with communities and other stakeholders dates back to 2012, with no consultation undertaken in 2013 and a single meeting (in February 2014) since. Apart from the 2014 meeting, the entire pre-consultation process in relation to the Framework was based on an alternative access to that now shown. The proposed access through the Garden of Remembrance was not consulted on in 2012 and the proposed access differs significantly from that with which the majority of local communities and other stakeholders will be familiar.
10. Approving the proposed route of the access road linking to the Jessiefield Junction through the Garden of Remembrance based on such limited consultation and limited publicity associated with it, as part of the current formal consultation process, is unlikely to meet the "adequacy test" set out at Regulation 27 (1)(a) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008, in relation to publicity associated with proposed supplementary guidance. The response to the first round of consultation is set out at paragraph 2.7.4 and in relation to transportation issues, it is stated that "*studies have demonstrated that the development can be expected to require two connections to the A944 to the north of the site to provide efficient transport connections for all users between the various development blocks on the existing road network surrounding the site*". It then continues, without explanation, by stating "*it is proposed that the western connection will be a public transport only link*". There is no explanation as to why this change would address the concerns relating to the number of car movements associated with the development and in particular how this would provide the most efficient all-vehicle connection between the OP58 site and the A944. The response set out at paragraph 2.8.3. In relation to the second round of consultation provides no additional explanation as to why this change is proposed.
11. In addition, at no stage during the explanation of consultation associated with the Masterplan (predominantly in 2012) is there any reference to the significant change included within the Framework involving the routing of the eastern access road from the OP58 site to the Jessiefield junction through the Hazlehead Garden of Remembrance. Our client considers this to be the most significant omission within the Development Framework and Phase 1 Masterplan and is of serious concern in terms of its credibility as supplementary guidance. Our client has no doubt that this issue will be examined by Scottish Ministers should the full extent and consequences of this change not be properly consulted on with all relevant stakeholders and the local communities.

Transport Assessment

12. A TA has been prepared which has been submitted to support the Development Framework, PPP application and Phase 1 Masterplan. This TA indicates that the analysis was based on parameters discussed and agreed with Aberdeen City Council (ACC) which resulted in an agreed position in January 2014 as presented in a Scoping Report (SR) included in the Appendix to the TA. The SR is dated October 2012 and does not include reference to January 2014 agreements. There is no indication that ACC are in agreement with the assumptions stated in the SR.
13. The traffic analysis presented in the TA uses traffic flows developed from TRICS rates and other parameters identified in the SR. Distribution of traffic to the A944 is summarised in Appendix G and clearly identifies significant traffic at Phase 1, 2 and 3 using the Kingswells roundabout. At full development it is estimated that the Countesswells traffic will have a 104% impact at Kingswells roundabout. This level of traffic and impact does not correlate with the strategy of providing a bus only access to Kingswells roundabout after the initial phase is complete.

14. A statement is made that the link capacity of Kirk Brae (north) and the approach to Kingswells roundabout can accommodate up to 400 units however neither a traffic distribution for this scenario nor a link capacity analysis is included in Appendix G.
15. In section 11 of the TA it is stated that there will be road upgrades with the introduction of a flare on the northbound approach to the Kingswells Roundabout and an additional lane on its circulatory. In Table 12.1 the timescale for these upgrades is suggested as beyond 400 units. The purpose of these upgrades is not made clear and is inconsistent with the aspiration for a bus only link.
16. Options for a replacement junction at Jessiefield are presented and assessed in the TA. Of the four options presented it is Option 3 (a staggered signalised crossroads) that is chosen for further analysis (Drawing No 92762/8006A). This further analysis does not appear to be presented in the TA. The junction layout for Option 3 is inconsistent with the link road and junction location identified in the Development Framework. Additionally an Option 5 layout (Drawing No 92762/8003B) is included in Appendix K of the TA which is not discussed in the main body of the TA although the results are presented in the Modelling Note included in Appendix J. The operational results for Option 5 indicate less delay and higher capacity than the results for Option 3.
17. The TA assesses the traffic impact on the local network and it appears from the details in the modelling note that the modelling has assumed two accesses to the A944 which can accommodate all modes of traffic. There is no summary or results from the modelling analysis to support a single all vehicle access and no analysis shown to determine the link capacity of Kirk Brae *prior to the Jessiefield junction upgrade* as required by the ESPIC.
18. There is no substantiating analysis presented in the TA in respect of the initial phases of development either as part of the phasing of the whole development as presented in the PPIP or to support the Phase 1 Masterplan (prior to the Jessiefield junction upgrade) application.
19. It is therefore our client's position that the TA as submitted in support of the Countesswells applications and the Development Framework does not present a cohesive analysis of the traffic impact of the proposed development and proposes inconclusive validation of the case for a single vehicular access at the Jessiefield junction as indicated. The assessment is inconsistent with the Development Framework as it presents inconsistent analyses and conflicting design layout options.
20. A detailed commentary on the TA is attached at the end of this response.
21. However, the TA does present an analysis that indicates that the access strategy of two all-vehicle accesses to the A994 via an enhancement of Kingswells roundabout and upgrade of Jessiefield to a signalised cross roads as presented through the consultations process in 2012 will provide an appropriate access solution that will accommodate the addition of the proposed development traffic to the local road network. The two access solution as presented previously and modelled in this TA does not require to provide a link road through the Garden of Remembrance associated with Hazlehead Crematorium, located within Hazlehead Cemetery.

Detailed Commentary on Development Framework

22. In addition to the specific matters referred to in previous paragraphs, our client would wish to highlight a number of concerns with the proposed supplementary guidance as currently drafted. These are summarised in the following paragraphs.
23. At paragraph 1.5 supporting information is referred to and the list of documents is set out which are purported to represent technical studies and surveys "*produced to support the production of*

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the Development Framework and Phase 1 Masterplan". It is clear from the text included in the ESPIC report and elsewhere within the Framework document that the TA is incomplete and has not, therefore, been produced to support the Framework and Masterplan. The list of documents referred to at paragraph 1.5 is prepared to support a planning application and that planning application was submitted on 24th March 2014. On this basis, it is erroneous to state that the documents associated with the planning application previously informed the preparation of the supplementary guidance on the basis that they clearly were not concluded by the date on which the supplementary guidance was reported to the ESPIC.

24. In addition, none of these documents has been made available as part of the supplementary guidance consultation process and as a result, respondents to this process are unable to judge the extent to which any of these studies has, in fact, informed the preparation of the Framework and Masterplan.
25. A further round of consultation on the proposed supplementary guidance, including access to the full list of documents referred to in paragraph 1.5 should be instigated prior to the reporting back of the proposed supplementary guidance to the ESPIC. This would also allow the inadequacies referred to above in relation to consultation to be satisfactorily addressed.
26. The diagrams within the first two sections of the Framework relate only to the OP58 site and do not properly reflect the full extent of the boundary of the proposed supplementary guidance. These include Figures 1 and 2 – whilst Figure 3 includes the land required for access to the OP58 site between the site and the A944, the boundary is referred to as the "*Proposal of Application Notice Boundary*" as opposed to the boundary to which the Framework and Masterplan relates. This should be corrected in a revised version of the proposed supplementary guidance prior to it being consulted on further in line with the recommendation in the previous paragraph.
27. The Site Analysis section (Section 3) makes no reference to the west Aberdeen Green Belt, the Green Space Network and the OP68 allocation (all as referred to earlier in this submission). Reference should be made to these in Figure 54 – Opportunities and Constraints, or in an alternative appropriate diagram within this section.
28. Paragraph 5.1.3 relates to the Development Framework Structure and the routes of the link roads from the OP58 site to the A944 are included in Figures 99 and 100. As referred to above, approval of the Development Framework as supplementary guidance would require access to be taken to the Jessiefield junction and Kingswells junction along the routes shown on Figure 99, unless there is a clear statement confirming that these routes, and the nature of the junctions, is indicative only. To avoid any potential impact on Hazlehead Garden of Remembrance, if a route is to be shown in the Framework, the route to the Jessiefield junction should be located to the west of the boundary of OP68 as it relates to the Garden of Remembrance.
29. In addition, it is premature to refer to the western access to the Kingswells junction being for bus and local access only in the absence of an agreed position as set out in the TA. These are fundamental matters of concern with the Development Framework and require to be addressed prior to its approval as supplementary guidance.
30. The Access and Connectivity Strategy is set out at paragraph 5.4 and Figure 108 sets out the proposed street hierarchy. The comments made in the paragraph above are equally important in relation to this section and in particular in relation to Figure 108 which, if approved as supplementary guidance, will dictate future planning applications. On this basis, a planning application that departs from the access routes shown within Figure 108 would be contrary to the supplementary guidance and contrary to the Development Plan.

Our client considers it to be inconceivable that ACC, and the ESPIC in particular, is willing to approve supplementary guidance which requires the main all-vehicle access road to the Countesswells development to be routed through the Hazlehead Cemetery, Crematorium and Garden of Remembrance without the full implications of this being known from a physical and environmental perspective and without the route having been justified through the TA. Our clients also consider it a necessity that even if the full implications of these proposals are indeed fully understood by the members of ESPIC then there should, at least, be a full and open consultation with the local population prior to any decision being made that will enshrine them in planning policy.

I should be grateful if you would acknowledge receipt of this letter in the first instance and look forward to a fully considered response in due course.

Yours faithfully



Jacqueline S Morton
Director

Countesswells - comments on the TA - April 2014

Section 1

1.1.5

The ALDP (2012) requires "new road links and major junctions at A944 with appropriate standards to accommodate forecasted traffic volumes."

It indicates major junctions at A944 not just one.

1.1.6

The ALDP indicates 3000 dwellings plus 10 Hectares of employment land.

1.1.9

The Scoping Report included in Appendix A was issued on 12 October 2012 not January 2014 as stated.

Para 1.3.3 in SR refers to principles from the 2009 Assessment being taken forward into the Masterplan - i.e. two accesses to A944

Residential Generation in Chapter 6 - Table 1 shows Phase 1 as 1000 units.

Committed Development at Phase 1 doesn't appear to include Friarsfield nor Prime 4 phase 2 /3.

There are no Appendices available for the Scoping Report

1.2

Although further Community Engagement is alleged to have happened on 3 Feb 2014 there is no reference to it in Chapter 4.

Section 2

2.4.7

Reference to a new link whereas the ALDP indicates links (plural)

Section 3

3.2.2

There is no indication or substantiation of the relocation of the AWPR traffic - what is this based on?

3.2.3

The existing facilities are all remote.

3.4.2

"Visibility of key junctions" appears to be a typo. Key junctions include Kingswells Roundabout.

3.4.9

The location of the AWPR and access junctions on it suggest that westbound and AWPR traffic is likely to gravitate towards the Kingswells junction for access to the A944

3.5

The accident history indicates that the accident history mainly involves the KW junction and northern section of Kirk Brae.

Section 4

No details given of Public Consultation and no mention of 2014 event.

Section 5

5.2.1

Phase 1 1000 units, Phase 2 2000 units, Phase 3 3000 units

5.2.2

Figure 5.1 indicates red line boundary to accommodate works at KW roundabout.
Phase 1 is to be 1000 units

5.3.1

Connection for all modes to Kirk Brae, the A944 and Countesswells Road

5.3.2

Link road from Blacktop to Kingswells Roundabout

5.3.3

No diagram to clarify which is Blacktop Road and which is Kirk Brae.

5.3.4

No analysis to support requirement for a signalised junction

5.3.7

Designing Streets doesn't make recommendations in regards to junction type in respect to the external roads connections.

5.5

Safe Routes to School has no detail

5.6.6

No details given of suitability or required improvements to road link to KW. Link identified at 5.3.2

5.6.8

Mini bus service suggested but no details of route or funding mechanism. Also suggests appropriate infrastructure to accommodate full size buses.

5.7.2

Initial phase traffic accesses KW roundabout. No mention of upgrades to southern approach to accommodate this additional traffic.

5.7.3

No detail of modifications to alignment of C189 (Kirk Brae).

5.8

Retained trips mentioned but level of retention or details / time of agreement not identified.

Section 6

Sustainable Travel Measures very generic with absolutely no detail for Phase 1a.

Section 7

7.2.1

When were parameters agreed as Scoping Report is dated Oct 2012

7.2.3

Gravity models not included nor indication of when agreement was reached with ACC.

7.3.1

TRICS rates in Appendix E are dated from June / July 2012

Trip generation for Phase 1 is given for 1000 units.

7.5.1

Phase 1 indicated as 1000 units.

Trip Generation note included - 11 December 2013 - indicating concern (para 1.3.5) about impact on Kirk Brae (south) and Baillieswells Road

Section 8

8.1.1

Appendix G - diagrams show full traffic @ Kingswells

Phase 1 - 1000 + Friarsfield - this diagram refers to 1000 unit Phase 1 and inclusion of Friarsfield traffic which is not indicated as included committed development.

Post WPR 3000 House + MST - diagram indicates full traffic at KW (split between 2 accesses)

8.2.1

Date of traffic data and surveys not indicated.

8.2.2

Friarsfield development not included as Committed Development.

Only Prime 4 Phase 1 included as committed Development. No indication of amended infrastructure at KW in connection with Prime 4

8.2.5

CTA measures indicated but not identified.

8.3.1

The link between the trip distribution shown in Table 7.7 and the distribution shown in Appendix H is not demonstrated.

8.3.8

Appendix I - Phase 1 has 1000 units, Full development indicates 104% impact at KW roundabout

Section 9

9.1.2

Link capacity assessment is not included in Appendix G

9.2 (9.1.1)

No capacity assessment to demonstrate that link to KW can accommodate 400 units.

No justification for not upgrading the currently sub standard road link to KW despite the intention to use it as a public transport (and local access) link once Jessiefield is opened.

9.2.1

No link analysis shown for Kirk Brae

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9.3.1

No link analysis shown for Countesswells Road

Section 10

10.1.2

First mention of 400 units

10.1.3

Flows in Appendix G show full access to KW and do not include a 400 unit scenario.

10.2.1 - 10.2.16

Modelling note

Note - tables are all headed "Scenario" - assumed headers to be AM and PM

Kirk Brae / Friarsfield Road / Kirk Terrace junction - signalisation increases delay at junction in all scenarios and by full development the design junction is over capacity.

Countesswells / Springfield Road - cycle time of 189 seconds appears high. No details of staging provided. Mitigation mentioned but not identified.

Craigton / Springfield Road - within capacity. 90 s cycle time. No junction details provided.

The junction of the NDR (A93) with Kirk Brae is known to be a congested junction with very tight geometry and in a constrained location. The results improbably suggest little impact from the additional traffic with no mitigation proposed. Without the models it is not possible to check further.

Baillieswells / NDR - appears to benefit significantly due to AWPR reallocation of traffic. This reallocation has not been justified or fully quantified in the TA.

Section 11

11.1.5

400 unit scenario mentioned but not shown in results tables

11.1.6

Flows in Appendix G show full access to KW and do not include a 400 unit scenario.

11.1.9

No results to substantiate these assertions

11.1.15

Option 3 Staggered crossroads taken forward - no further assessment shown. Note location of approach to Option 3 junction (dwg no 92762-8006-A)

Modelling Note

Signalised Roundabouts - tested as one model

Phase 1 - full traffic at KW roundabout.

Mitigation for phase 1 - para 1.7.2 - "introduction of a flare on the northbound approach to the Kingswells Roundabout and an additional lane on its circulatory. Addition of these improvements accommodates the development traffic"

11.1.16

No indication of where these figures in Table 11.3 have come from. They are not comparable with the results shown in the modelling note. The note also includes an Option 5 which is not mentioned in TA but is included in Appendix K (Dwg No. 92762-8003-B)

Section 12

12.2.1

Capacity assessment of Kirk Brae link is not shown

12.2.2

Improvements to Kirk Brae link not identified.

12.5.1

Table 12.1 mitigation measures indicate upgrades to KW roundabout approach, localised improvements to Kirk Brae (north)

From: PI
To: Laura Robertson
Subject: FW: Countesswells Development Framework and Phase 1 Masterplan
Date: 29 April 2014 09:41:36

From: JONATHAN LATIMER [REDACTED]
Sent: 29 April 2014 01:17
To: PI
Subject: Countesswells Development Framework and Phase 1 Masterplan

I am writing to object to the Countesswells Development Framework and Phase 1 Masterplan and in particular the Access and Connectivity Strategy.

The first point is that the consultation exercises undertaken so far seem to be flawed. I take a keen interest in local planning matters and was particularly looking for this development proceeding as it could affect the sporting facility that I and Chairman of, however this consultation is the first I have seen. I can only assume that the previous consultation exercises were poorly advertised.

Although I appreciate that modern planning dictates that roads in built up areas should be anti car this should not be used as an excuse to block off existing through routes. These should be enhanced to allow traffic to easily bypass the residential areas.

The consultations that do seem to have taken place with community councils appear to have concentrated on the perception that the existing roads passing through the proposed development are "rat runs". Countesswells Road and Kirk Brae are not a "rat runs" but significant parts of the road network on the western side of the city allowing traffic between the outer edges of the city and the Shire to move in a logical direction without travelling towards the centre before heading back out again. If the councils bothered to consult with their residents they would realise that the people using these roads are the ones they are supposed to be representing. Unfortunately the proposals will merely produce 3000 more households who will be using these roads to access the parts of the city and Shire that they want to go to while frustrating the existing residents.

The idea of blocking off the access to Kingswells roundabout is plain stupid. Traffic accessing the AWPR does not want to be travelling back into the city before turning back on its self.

The dismissal of the consultees that did wish to see the existing road network maintained shows that those undertaking this study have no understanding of the current road use and wishes of the wider community. The usual calls for more public transport are not representative of the wider population and are irrelevant for those not travelling into the city or at the times that it operates.

The development needs to have strong connections in all directions and not act as a block to existing traffic flows.

Unfortunately this means that the whole process will need to start again based around a sensible and logical road network that serves all the people of Aberdeen and the surrounding area. It is unfortunate that so much effort has been put in to such flawed scheme but if the original consultation had been properly conducted this would not have happened.

Countesswells Development Framework, Phase 1 Masterplan and Planning Applications 140435 and 140438

Comments by Kingswells Community Council

ACCESS

KCC approves of the main road access into the development being from the Greenhedges/Jessiefield junction on the A944. It also supports the eventual restriction of the existing Cults-Kingswells road (C189) to a bus and cycle route that also allows access to existing properties. This should help to limit future traffic congestion at the Kingswells roundabout.

However, KCC also has some real concerns about access arrangements:

- (1) The main access road from the A944 is routed through the area (OP68) designated in the current Local Plan for future cemetery expansion. More seriously, the road would cut through the western end of the Garden of Remembrance at Hazlehead Crematorium. The garden is currently a very peaceful place and is not appropriate for the construction of a busy access road. A large number of trees within the garden bounds will need to be felled. Mourning relatives have recently scattered loved ones' ashes at the bottom of some of these trees. The Garden of Remembrance also recently achieved notoriety in connection with the possible disposal of the ashes of dead babies without the knowledge their parents. Routing the main access road through this very sensitive area could result in adverse publicity for planners and councillors. KCC would urge that the road be re-routed further to the west at this point.
- (2) Until the new access road and AWPR are built, there will be traffic problems on the C189 where it approaches the Kingswells roundabout. This section is already nose-to-tail at peak times and congestion will only increase as the first tranche of new homes is built. It will be essential to disallow traffic hold-ups due to construction work at peak times.
- (3) KCC has little confidence in the traffic assessment calculations for Countesswells. In particular, the use of the Blacktop road as a "rat-run" to access Westhill from Countesswells is being underestimated. This country road is totally unsuited to high traffic volumes and is potentially unsafe. Ways will need to be found to discourage drivers from using this road as a shortcut to Westhill from south Countesswells.

HOUSING TYPES

It is unsatisfactory that the needs of elderly people are being overlooked in this development. The demographic projections for Scotland are quite clear and need to be properly addressed. Many elderly people are looking to "down-size" and relocate to single-storey homes. Small bungalows or flatted accommodation with lifts would help to meet their needs. In seeking to maximise profit, the developers involved are not taking this matter seriously enough and are not providing sufficient homes of the right type.

ENVIRONMENTAL ASPECTS

KCC supports, in particular, the creation of a central park, the use of existing watercourses, and the conversion of the tree-lined section of Countesswells Road to a vehicle-free access.

Claims about the overall amount of green space, however, are misleading as several of the "green" areas are simply wayleaves for overhead power lines. SSE will insist on keeping these areas free of any planting. This will considerably limit opportunities for landscaping.

The Countesswells development must be hidden as far as possible when viewed from Kingswells and prominent viewpoints like Brimmond Hill. To achieve this, the northern

boundary including residential blocks N1 and N3 needs to be screened off by a thick belt of substantial trees, both deciduous and non-deciduous.

The routing of the main access road through a forested area should not be used as an excuse for removing whole blocks of woodland. As far as possible, trees that need to be felled should be replaced with indigenous species.

SUDS basins should, wherever possible, be used to encourage biodiversity. Unattractive and sterile grass basins, devoid of any water for most of the year, are not acceptable.

It is very disappointing that the former reservoir (now a wetland area) shown in 3.3.1 of the consultation document is not being properly exploited to create an area of biodiversity and a possible water feature. It is inappropriate that residential block S9 has been allocated to this site. On the Prime Four site at Kingswells, the creation of an attractive pond from a similar area of marshland is a good example of what can be achieved with a bit of imagination and concern for the environment.

MAINTENANCE OF COMMUNAL SPACES

It is essential that maintenance arrangements for *all* communal spaces, including green areas, are set out transparently and in legal terms from the outset. No residents or employers should be left in any doubt about the persons/agencies responsible for the upkeep and safety of areas next to their properties.

There is considerable scope to increase biodiversity on the Countesswells site which is mostly just fields at present. To achieve this, some of the green areas should be kept in a managed but "un-manicured" state. This is likely to include the edges of watercourses and ponds.

OTHER INFRASTRUCTURE

All homes and businesses should have easy access to high-speed, fibre optic broadband from the outset (not as an afterthought). This is already happening at Chapelton of Elsick, for example.

18.

CRAIGIEBUCKLER AND SEAFIELD COMMUNITY COUNCIL

Ms Laura Robertson
Senior Planning Officer
Planning and Sustainable Development
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

10 Craigiebuckler Drive
Aberdeen
AB15 8ND

Email: craigseacc@hotmail.co.uk

29 April 2014

Dear Ms. Robertson

Countesswells Development Framework and Phase 1 Masterplan.

We are concerned that the existing roads infrastructure will be inadequate to cope with the traffic generated by this proposed development. It is our contention that, despite recent upgrades to the A944 (Aberdeen to Westhill) dual carriageway, the volume of traffic attempting to access the roads during the rush hours will result in lengthy queues which, in turn, will increase air pollution.

There is no apparent record of hydrology surveys having been completed on this extensive site. The plans do not take the natural springs and watercourses into account.

Until after the initial phases of homes are sold primary health care will have to be provided by the existing local GP practices. We contend that those medical practices will be overburdened by an overwhelming number of new patients from the proposed development until a sufficient number of homes are sold to fund the construction of a health centre within the development.

At the last Liaison Group Meeting it was mentioned that one secondary and two primary schools are to be built. During the construction of the first primary school the first children from Countesswells are to be transported to Braeside Infant School, which will be upgraded to make it suitable for P1 to P7 pupils. The first primary school will be ready for the 400th house. Then construction will begin on the second primary school. The Countesswells site is to be re-zoned to Hazlehead Academy until the secondary school is completed in 2018/2019. However, the Development Framework Document does not specify the timing of the transitions from the interim to the permanent educational establishments. We contend that the occurrence of this transition is dependant on the continued strength of the housing market and therefore expect that the period of dependency on the interim educational resources will be of indeterminate length. Furthermore, the strategy for the interim provision of primary school places is perceived by us as fragile because it is dependant on the completion of one construction project – the upgrade of Braeside Infant school. If this falls through, class sizes could increase well beyond the guidelines set by the Scottish Government.

We welcome the 25% affordable housing allocation. The developers stated their commitment, at the last liaison group meeting, to the delivery of the full amount of affordable housing. However, we advise scrutiny of any plans submitted for affordable housing, particularly 2 bedroom properties, to ensure that dimensions of the rooms comply with building regulations and that adequate storage space is provided. The plans should also be drawn up in consultation with affordable housing providers.

Roads and Transport

It is our contention that a possible 12 month closure of Kirk Brae, to facilitate the installation of the utilities for Phase 1, is too lengthy a period. Kirk Brae is an integral part of the city's established roads infrastructure. The closure of Kirk Brae will cause congestion on the surrounding roads and closing it for such a long period will result in prolonged and frustrating difficulties for commuters travelling north to Kingswells, Westhill, Dyce and other locations to the north of the city. This road should not be closed at peak travel times. We believe that its closure could be avoided if the new link road was built very early in the development.

Bearing in mind that a 3000 home development is being planned, we disagree with the tendency of the roads infrastructural design to direct traffic towards Aberdeen's urban routes because such a solution is unsustainable in terms of increases in congestion and pollution.

In our opinion, Aberdeen City Council should consider the advantage of routing traffic, moving South to North, through the middle of the proposed development. This route could also serve as a distributor road for the streets throughout the phases of their construction. The main route for the proposed development could be constructed round its periphery.

The proposed route for the road to the Jessiefield junction appears to run through the western end of the remembrance garden at the Aberdeen Crematorium (ref. map page 61 and elsewhere). We submit that this aspect of the proposal lacks sensitivity because it seems to take no account of the fact that many families will have spread ashes of loved ones in this area. We feel that it would be more appropriate to route the road to the west of the garden.

Utilities

This is a development for the 21st century. Therefore the provision of high speed broadband through fibre optic cable should be compulsory by virtue of a legal agreement with the developers.

Landscaping and Drainage

We are concerned that a significant amount of the planned greenspace runs under the existing high voltage power lines and therefore contend that any claim by the developer which states that this area is part of his contribution to green space provision is questionable.

It is also worrying that there is a powerline crossing the playing fields of the proposed secondary school.

We advise against locating properties in close proximity to woodland because of the safety risk from falling trees. We favour the provision of a clear safety margin between the housing and wooded areas.

Hydrology surveys should be conducted throughout the site to detect natural springs and watercourses as a preliminary to planning the systems of drainage. Sudds areas and wetlands should be integral to all landscaping strategies.

Yours sincerely,
William Sell
Chair

SDPA CONSULTATION RESPONSE ON PLANNING PROPOSAL

PLANNING PROPOSAL	
Local planning authority: Aberdeen City Council	
Proposal: Countesswells Development Framework and Phase 1 Masterplan	
Reference No:	Date received:
Case Officer:	Target date: 29/04/14

STRATEGIC PLANNING OBSERVATIONS

The Development Framework and phase 1 masterplan for Countesswells proposes development of allocated masterplan zone OP58 of the current Aberdeen City Local Development Plan. The whole masterplan zone is currently allocated for 3,000 new homes and 10 ha of employment land, the site being approximately 166ha. The site falls within two LDP phases- 2,150 homes in the period 2007 – 2016 and 850 homes 2017 – 2023. The phase 1 masterplan submitted (comprising 48ha) proposes 1,000 new homes, mixed use and employment areas.

The Development Framework (DF) is proposing to contribute significantly to the Aberdeen City housing requirement set out in the Strategic Development Plan (SDP). The DF is generally proposing development of a high quality in terms of design. However, a number of points in terms of consistency with regional priorities have been highlighted below.

Energy Efficiency - Neither the development framework nor masterplan identify how energy saving technologies will be incorporated into the development. The requirement for larger developments to consider the scope for incorporating combined heat and power schemes (CHP) is highlighted in paragraph 4.7 of the SDP. There does not seem to be any consideration given to this within the DF or masterplan. The SDP makes clear that new developments must be designed to be more resource efficient; the plan sets a target for all new buildings to be carbon neutral by 2020.

Page 92 under architecture states that; "Architecture should also strive for strong environmental standards, reducing energy consumption and help Countesswells meet sustainability aspirations" but no further detail is provided as to how this might be achieved? Given the overall scale of development proposed, for the DF and masterplan not to have considered the fundamental environmental principles, inherent to successful sustainable development would seem a serious oversight.

Waste – There is no reference throughout the DF or masterplan to a commitment to provide recycling facilities in line with the waste hierarchy. Given that Aberdeen City and Shire are missing Scottish Government targets for the amount of waste still being sent to landfill, this is something which should be identified at the earliest stage.

Quality of Design – A central objective of the SDP is to create more attractive places which function sustainably and meet the needs of the whole community. The SDP strongly advocates that successful places must incorporate a mix of land uses. The Countesswell DF and phase 1 masterplan are proposing to work with these principles in order to create a well designed mixed use development. This is welcomed.

Density – The proposal to have an average density across the site of 30 units/hectare,, comprising a range of densities is welcomed and consistent with the SDP requirement.

Affordable housing – The DF in 5.5.2 states that "the development will provide up to 25% affordable housing", while this could be interpreted as less than a 25% provision, 7.1, further

clarifies that the affordable contribution will be in line with the Local Development Plan policy requirement for 25%. In terms of the SDP requisite this is acceptable.

Water – The DF states that a Water Impact Assessment has been carried out in order to assess the existing capacity of the water network, as well as future pressures. It is noted that there is no development proposed on any land which SEPA identified as at risk of flooding through their recent flood risk mapping exercise. It is also noted that the impact of the development on the River Dee SAC has been considered through the HRA, and impacts were not found to be significant. Furthermore, it is recognised that surface water discharge into the Dee which occurs as a result of the development will be managed and minimised through a surface water drainage strategy and the use of SUDS. However, what is lacking from the DF or masterplan is any reference to how water saving technologies will be considered and incorporated? It is an important requirement of the SDP for all new development to employ water efficiency through the assimilation of water saving measures.

Transport – It is noted in the DF that a contribution to the Strategic Transport Fund will be sought as well as planning gain. Public transport was picked up as a key issue through the public consultation process. The SDP spatial strategy is largely based on the need to make public transport, walking and cycling a much more attractive option. This will involve a move away from an overreliance on private car use, which is contributing significantly to the regional CO2 emissions (transport CO2 emissions making up around 20% of the total regional emissions in 2011). Given this fact, the proposal for a strategic path network is welcomed.

Section 5.4.2 of the DF identifies the potential opportunities for access by bus, the proposal to create a bus only access route to the north west of the site is welcomed. However, there seems to be some uncertainty as to how the overall development will eventually be serviced by bus. Given there are no existing bus routes through the site, discussions with bus operators will need to provide greater certainty in relation to the availability and frequency of services.

Broadband The provision of up-to date, high speed telecommunications networks and utilising fibre to the home technologies is not picked up throughout the DF. The SDP states that the roll-out of high speed broadband will be vital to the future health of the local economy. Given the poor provision of broadband within large parts of the region, ensuring that fibre to the home technologies are incorporated into all new development will be extremely important. Given the scale of new development proposed within the DF, it would be expected that the position regarding telecommunication provision would have been outlined.

OTHER OBSERVATIONS AND POLICY CONCLUSION

In terms of layout, design and overall quality of development the Development Framework is robust and in line with central objectives of the SDP. It is clear that design principles have been given valuable consideration. The internal environmental considerations must be given equal weighting within the DF. The reduction of carbon emissions is a fundamental requirement, which should be given more attention. This would seem particularly imperative given the scale of development proposed within this site and also the level of development proposed within the wider Aberdeen City and Shire area.

Author: Clara Thompson

Date: 24/04/14



Countesswells Development Framework and Phase 1 Masterplan – Consultation Response, April 2014

1. Introduction

This response has been issued on behalf of Drum Kingswells Business Park Ltd. We reserve the right to add to it should additional information become available. In the meantime we believe that the Countesswells Development Framework does not entirely reflect the current retail policy background and seems to be biased towards the inclusion of major convenience retail use at Countesswells.

This isn't reflected in current and potential future land use policy and there are two main pieces of evidence that we would like to refer to. These are the Aberdeen City and Shire Retail Study Update 2013 and the recent Aberdeen City Main Issues Report.

2. Aberdeen City and Aberdeenshire Retail Study 2013

This review of earlier retail studies uses a methodology based on the preparation of a Strategic Retail Model (SRM) for the period to 2027, leading on to recommendations of a retail strategy that:

- Addresses retail deficiencies in existing urban areas;
- Identifies retail floorspace to serve new and expanded urban areas;
- Considers the future growth of the City Centre;
- Considers specific retail sectors; and
- Recommends a framework for emerging development plans

The executive summary clearly establishes that one of the principal convenience retail deficiencies in the City exists in Zone 29N i.e. West Aberdeen. The shopping study clearly states *"No specific location is identified and this can be met through the provision of convenience floorspace in more than one location. Qualitative deficiencies would support some of this floorspace to be located in the Countesswells development to serve the local day-to-day and limited main shopping needs"* (page 14 of the Executive Summary).

Page 19 of the Executive Summary then goes on to quantify the retail requirements in Zone 29N. It suggests that 5,500sqm of new convenience retail floorspace is required **to be operational by 2020 to 2025**. The same table indicates that **only some** of the convenience floorspace is to be located in Countesswells **to form the basis of its new centre** with an additional 1,500sqm for general comparison shopping.



Table 5.2 defines Zone 29N as “Kingswells, Maidencraig and Countesswells” i.e. both existing and proposed settlements. The need for new retail does not just originate from Countesswells but from a variety of established locations, particularly Kingswells which is lacking in appropriate retail facilities.

The 2013 Retail Study Update therefore proposes new convenience and general comparison retail floorspace for the west of the City BUT it clearly indicates that not all of this should be located at Countesswells.

3. Aberdeen’s Future Retail Policy

The Retail Study Review was used to inform the proposed retail strategy in the Council’s recent Main Issues Report (MIR). Table 6 of the MIR (Page 29) follows the recommended approach and indicates that Zone 29N (West Aberdeen) can accommodate new retail floorspace **in more than one location** for “*Approx. 7,000 total: 5,500 convenience + 1,500 general comparison+ local shops and retail services.*”

Aberdeen’s emerging retail policy is therefore following the recommendations of the Retail Study Update 2013 and proposing that retail is provided for the West of Aberdeen in more than one location. Countesswells as a new settlement has been recognised as having its own local retail need but not as a new retail centre for the West of Aberdeen. Indeed, as a retail destination it has the potential to encourage additional car trips on a constrained road network.

4. How Should this Affect the Draft Countesswells Framework/Masterplan?

The draft Development Framework and Phase 1 Masterplan is an extensive document with many references to retail use. The intention is that it will become Supplementary Guidance. If that is the case then it should reflect the policy situation with regard to retail use more closely than it presently does.

We agree that Countesswells should be developed as a self-sustaining community (4.1 *The Opportunity and Vision*) with the appropriate range and scale of services to support itself, as all communities should. However, we don’t agree that it should be a retail destination for West Aberdeen. There are two key issues with this: it will encourage unnecessary shopping trips and therefore car journeys when there are more sustainable locations elsewhere; and, existing settlements will potentially lose out on the opportunity to become self-sustaining communities themselves. New settlements should not be progressed to the detriment of existing ones.

Table 2 (Page 68) suggests that a “fully-developed” Countesswells new settlement could support a new supermarket to meet the requirements set out in the 2013 Council Retail Study Update. The most recent 2014 (Draft) Housing Land Audit suggests that Countesswells will not start delivering housing until 2016 and then applies a very generous development rate for the years beyond that. Even accepting the generous development rate (which we doubt) Countesswells will not be fully developed until after the period when new retail floorspace is required as set out in the 2013 Retail Study i.e. beyond 2025. By 2020, the start of the period where new retail floorspace is required in



West Aberdeen, less than half of the houses at Countesswells will have been built. Countesswells then could, potentially, support a new supermarket to service its own needs **but not until late into the development.**

Throughout the Framework/Masterplan document convenience retailing is referred to in a number of different ways. In some sections it describes the supermarket as “local provision” for local needs to create a sustainable community and in others it describes a “large supermarket”. Page 103 of the draft document presents probably the best description “*The scale of the supermarket should meet the needs of the community and in line with the aims of the Council Development Plan (2013 Retail Study)*”. The scale of the proposed settlement at Countesswells will not support a large supermarket. Its delivery will be tied in to the wider delivery of the housing so is likely to be delivered later in the development programme.

5. Suggested Changes to the Framework/Masterplan

The Framework and Phase 1 Masterplan should be consistent in its description of the type, scale and function of retail that it expects to deliver at Countesswells. This should be based on the Retail Study Update 2013 and the emerging Local Development Plan i.e. **local convenience shopping provision to serve the local day-to-day and limited main shopping needs of the Countesswells new settlement.**

It shouldn't seek to support large convenience retailers or attempt to become a new retail centre for West Aberdeen. There are far better and more sustainable means to achieve a proper network of convenience shopping provision across the City so that all communities have convenient access to supermarkets.

29th April 2014

Our ref: PCS/132333
Your ref: E:G8/36

If telephoning ask for:
Susan Haslam

29 April 2014

Laura Robertson
Aberdeen City Council
Planning & Sustainable Development
Business Hub 4, Marischal College
Broad Street
Aberdeen

By email only to: pi@aberdeencity.gov.uk

Dear Ms Robertson

Countesswells Development Framework and Phase 1 Masterplan Statutory Public Consultation

Thank you for your consultation which SEPA received on 14 March 2014. We welcome the opportunity to comment on the draft Framework and Masterplan (here after just referred to as "the Plan").

We have made a number of representations below which we consider will help ensure that the development is environmentally acceptable and help provide clarity on the need for any applicant to provide appropriate information to avoid unnecessary delay and/or objection from SEPA. Since the issues in which we have an interest are spread throughout the document we have in this case provided our comments in the same order as they appear in the Plan. We hope this is a helpful approach.

1. In relation to Section 3.5.1 we have previously provided the council with a summary of the findings of a SEPA officer's survey of the site but this is provided again now in case you have not seen it and it is still helpful:

The Cults burn and its tributaries generally flow north to south and exit the site in a south-easterly direction. The Cults Burn issues at NGR NJ 8722 0517, flows some distance south, then turns westwards at NJ 8742 0445 toward Mains of Countesswells Farm. Thereafter it is culverted and reissues at NJ 8754 0431. Here, a tributary of the Cults Burn comes down from Brookhill at NJ 8756 0448 where there are two issuing points. The burn and tributary combine under the Countesswells Road and flow southwards past Red Gables at NJ 8758 0431. The watercourse then takes a westwards turn at NJ 8759 0407. It disappears at NJ 8770 0409 and is presumed culverted under a large walled enclosure centred around NJ 8777 0409 and remains underground for a total distance of about 300 metres before it re-emerges at NJ 8801 0404 just below Meadowbank and Colthill Farmhouse. The burn then flows in a south-easterly direction before exiting the development site towards Cults. A second tributary of the Cults Burn issues at NJ 8779 0432, goes under the Countesswells Road then flows westwards, then turns south at NJ 8794 0429 and disappears just above Meadowbank at NJ 8796 0411. It then re-emerges with the Cults Burn below Colthill Farmhouse at NJ 8801 0404 (as referenced above). A third tributary issues at NJ 8804 0460 and flow southwards. At NJ 8808 0432 it picks up a small stream flowing westward from an



Chairman
David Sigsworth
Chief Executive
James Curran

Aberdeen Office
Inverdee House, Baxter Street
Torry, Aberdeen AB11 9QA
tel 01224 266600 fax 01224 896657
www.sepa.org.uk

issuing point at NJ 8821 0433. Combined flows go southwards, and join the main Cults Burn at NJ 8811 0400 near the final exit point. A watery ditch in the central part of the site running on an east-west alignment, and centered around NJ 8779 0455, is not strictly a watercourse, but should be protected as a water feature as part of the wider natural water environment

2. As the site is currently agricultural the developer should expect to encounter a large number of field drains, another consideration they should be aware of. We therefore ask that Section 3.5.1 is expanded to make reference to the likely presence of field drains.
3. We support the requirement within Section 3.5.2 of the Plan that a Level 1 Flood Risk Assessment will be carried out as part of the planning application process. We agree that the Flood Risk Assessment should include an assessment of the existing drainage network and should be extended fully downstream to include all culverts along the Cults Burn. It should be noted that parts of the site may be at risk from surface water flooding. We note from the Plan that these areas of the site will be developed and potential surface water flooding will be incorporated into the drainage design. We would therefore recommend that the Roads Department of Aberdeen City Council be asked to provide advice on this matter if they have not done so already.
4. In the paragraph on existing watercourses and ditches in Section 3.11 we welcome the highlighting of potential opportunities for naturalising watercourses, deculverting (including of any existing covered field drains) and protection buffers. However we consider that the Plan should go further than this and ensure that these measures are taken. We therefore **object** unless this paragraph is amended to make sure that deculverting, providing buffers to watercourses (at least 6 m from top of the bank and following your own buffer guidance) and naturalising artificially modified watercourses are all specific requirements of the Plan. Please note that any stretches of watercourse that have existing good banks should be preserved to avoid disturbance.
5. In relation to protection of the water environment and Figure 96 then we are generally pleased to note that most of the watercourses are located in green corridor areas. However this is not the case for the watercourses in the vicinity of (1) development blocks S2 and S6 and (2) for to the school sites at Block C11. In the case of the phases S2 and S6 then from the Figure it looks like the watercourse would be culverted. We would **object** to such a proposal or any alternative which did not provide adequate space for the watercourse within a finalised layout. We therefore ask that the overall framework plan is revised so that a clear corridor is provided for the watercourse. In the case of the school site then the watercourse should be sensitively rerouted around the primary school site, or the school moved further away from the watercourse.
6. In relation to the first paragraph of Section 5.3.1 then please note that existing watercourses should not be considered to form part of a sustainable drainage system; to avoid confusion we ask that this be reworded. Also we ask that the requirements for deculverting be made more explicit.
7. Generally the other information provided on SUDS in Section 5.3.1 is good. However in line with the requirements of the newly approved Aberdeen City and Shire Strategic Development Plan we would also expect to see reference to the need for rainwater harvesting to be employed as one of potentially a number of water-saving technology to be used to reduce the need for local water abstraction.
8. It may be helpful to the developer if the Plan highlighted that there will be a need for other authorisations as well as planning permission. In relation to impacts on the water

environment then a number of proposals, such as watercourse engineering works and SUDS discharges, will require some level of authorisation under the Water Environment (Controlled Activities) (Scotland) Regulations (CAR). Our local operations team in Aberdeen would be very happy to discuss any such proposals with developers before they make their planning application.

9. In relation to Section 5.3.2 we welcome the clear statements regarding foul drainage connecting to the public foul sewer. Proposals should be discussed at an early stage with Scottish Water to ensure that capacity exists (or can be made) in the local sewer network.
10. We very much support the reference to the need for a draft Construction Environmental Management Plan in Section 3.8.3, especially since due to the presence of a high groundwater and poor local drainage conditions we expect that controlling run-off may be especially problematic. We therefore consider that it should be made clearer that developers will be required to submit a draft Construction Environmental Management Plan with the planning application for each phase of development and that the draft Plan should specifically outline the measures to be taken to manage surface water on the site. This should include details of construction SUDS and plans for managing works after periods of heavy rainfall.
11. We note that the Plan lacks information on waste management. Scottish Planning Policy Paragraph 215 states that "residential, commercial and industrial properties should be designed to provide for waste separation and collection." In accordance with this policy, and PAN 63 *Waste Management Planning*, space should be designated within the site layout to allow for the separation and collection of waste, consistent with the type of development proposed. In the interests of meeting the requirements of Scottish Planning Policy and the Local Development Plan, we recommend that reference to this requirement as part of any planning submission is added to the Plan.
12. For information the site also falls into a drinking water protected area and so private drinking water supplies should be anticipated and planned for. We have previously provided advice which suggest that we hold a single licence-level ground water abstraction record for the area, however it should be noted that we do not hold records of supplies using <10m³ per day and your environmental health colleagues should be consulted in this regard.
13. Generally we welcome the indicative layout of the Phase 1 Masterplan. As far as we can determine all watercourses within this phase are located within green network areas and are therefore protected from inappropriate development. The information provided on the Cults Burn Corridor in Section 6.5.2 is especially good and we welcome the likely ecological benefits that this should bring. The design principles in this section should however be expanded to make comment regarding the need for the design to be influenced by the Phase 1 flood risk assessment.

Should you wish to discuss this letter please do not hesitate to contact me on 01349 860359 or planning.aberdeen@sepa.org.uk.

Yours sincerely

Susan Haslam
Senior Planning Officer
Planning Service

Ecopy: Sue.Lawrence@snh.gov.uk

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.