

<b>Newhills Development Framework</b>		
<b>1. Aberdeen Cycle Forum</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
The Forum is slightly concerned some of the evasive language regarding the cycle links to the proposed development. The proposed cycle ways cannot end at the site boundaries. To accommodate larger number of potential commuting cyclists, links must be improved.	There are a number of paths identified within the Framework area connecting into the existing wider network (fig 44).  Further detail on the path network will be provided as part of the Masterplans for each site.	No actions required as a result of this representation.  Comments passed onto the developers.
The document relies on dual use paths which are poorly marked and inadequate. Given the proximity to Dyce and Aberdeen better links for community are required to the north east and south west.	There are a number of paths identified within the Framework area connecting into the existing wider network (fig 44). In particular the north-south dual use path through a site will be provided. This connects to three areas where it will be possible to cross the A96.	No action required as a result of this representation.
The NCN1 is in proximity to the site, but it is not useful for commuting purposes to most desired points.	This is one aspect of the path network that has been identified. There is an extensive path network through the site that provides access and connection to the surrounding area and wider network.	No action required as a result of this representation.
More concrete plans for cycle infrastructure are required.	The path network for all users has been clearly identified within fig 44. Further detail on this topic will be provided as part of detailed Masterplans for each phase of development.	Further detail will be required within the relevant Masterplan for each site, to ensure successful connectivity of the path

		networks.
<b>2. Bucksburn and Newhills Community Council – pre committee comments</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
<p><b>Community facilities</b></p> <p>It states in the document: “Existing facilities at Forrit Brae and around Bucksburn Academy ensure that much of the expansion area falls within the accessibility standards set by the Council's guidance on open space provision.” Need to be aware that the community council receive a number of complaints from local sports groups who used to play on pitches prior to the building of the new school. They are now being denied access to the pitches and some local teams now have to play matches at Inverurie.</p> <p>This is unacceptable and provision must be made available in the expansion area to encourage these teams to return to Bucksburn/Newhills.</p>	<p>There will be pitches associated with both primary schools along with some MUGAs.</p> <p>Further analysis has been carried out and pitches and a potential games hall location have been identified (should the hall be required) (Appendix 3). These areas are shown as pitch options, with the exact requirement being determined via the relevant Masterplan and through discussions with Aberdeen City Council's Education, Culture and Sport Service.</p>	<p>Amend framework in accordance with the revised sports pitch provision diagram.</p> <p>Add text to Framework under 5.5 to describe the additional pitch provision available onsite but subject to detailed input from Education, Culture and Sport in relation to what particular uses are required. The details will come forward in the relevant Masterplan.</p> <p>Update the pitch provision totals accordingly.</p>
<p><b>Opposition to Gypsy/ Traveller site</b></p> <p>The number of sites being proposed in or adjacent to the Newhills Expansion Area are too many and recommend that if a site has to be included it should be on the land in</p>	<p>There will be one Gypsy Traveller site provided within the Newhills Development Framework area but at this time there are two options being put forward. The most</p>	<p>Add text in the Delivery section stating: “An agreement on the chosen site and equalisation</p>

<p>the ownership of the council to the extreme south of OP31.</p>	<p>appropriate location for the Gypsy Traveller site will be assessed and determined prior to any Planning Application in Principle being granted.</p>	<p>mechanism to be utilised to calculate the respective contributions and compensation for accommodating the site must be reached between the developers prior to consent being granted for any of the subsequent PPIP applications. This mechanism will be agreed through the Section 75 negotiations.”</p>
<p><b>Community Requirements</b> We would ask at this stage that either the new school be reinstated in the Framework, or a commitment be made at this stage to Bucksburn Academy being extended, if that proves necessary due to pupil numbers.</p>	<p>The school provision is dependent on a number of factors including rezoning, school provision and capacity in other areas of the City. Given all these factors the provision of a secondary school on this site is not deemed appropriate. Extending Bucksburn Academy is the preferred option and is currently being pursued by Education. Feasibility and costing exercises are ongoing but it is likely that the extension would be required in 2019 to accommodate pupils from Newhills. A representative from Education, Culture and Sport will provide an update at the Committee meeting.</p>	<p>Amend the text under 5.6.9 in accordance with the most up to date information as of 4 September Committee.</p> <p>It should be noted within the Framework that this is an ongoing process and more detail on the School provision and associated facilities will be provided as part of the Masterplan and planning application process for the relevant phase.</p>

<p><b>AECC</b></p> <p>Disappointment at the late stage in proceedings that the Community Council have become involved. Concern with the traffic to and from the venue and noise impact for those living nearest the new building.</p>	<p>The AECC consultation and proposals are not part of Newhills Development Framework Area. Detailed assessments and consultation will be carried out for the AECC site and any comments should be specifically made during this process.</p> <p>The traffic impact on the A96 and the junction strategy is being considered via a wider A96 modelling exercise. A detailed strategy will be produced as a result of this exercise. ( see later comments in the Appendix for further detail)</p>	<p>No action required as a result of this representation.</p>
<p><b>3. Scottish Water</b></p>		
<p><i>Summary of Representations</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>Newhills have been in contact with Scottish Water and as a result of this engagement Scottish Water have no issues with the information provided in the document in relation to water and drainage.</p>	<p>Noted</p>	<p>No action required as a result of this representation.</p>
<p>The original main from Fernhill DSR to Dyce was upsized to accommodate these developments and the new AECC. A Water Impact Assessment will be required for the sites.</p>	<p>Noted: the requirement for a Water Impact Assessment is already noted within the Delivery section of the Framework.</p>	<p>No action required as a result of this representation.</p>
<p>A Drainage Impact Assessment will not be required in this instance as a strategic wastewater study of Aberdeen is being undertaken which will identify where in the network investment is required.</p>	<p>Clarification on timescales for Scottish Water undertaking the strategic wastewater study was sought. It was confirmed this was as yet unknown but</p>	<p>No action required as a result of this representation.</p>

	unlikely to be until 2015. Given this, it should be noted that planning applications will be assessed as normal. DIAs will be required in accordance with the Aberdeen Local Development Plan Action Programme.	
Note that Sewers for Scotland 2 will be superseded by Sewers for Scotland 3 in the next few months.	Noted	Update text accordingly if the document has been superseded at time of Committee.
Current design standards will need to be met if the developers want the water and drainage infrastructure to be vested by Scottish Water.	Noted	Comments forwarded onto the developers for information.
<b>4. Forestry Commission</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
A strong Green Network has been planned through this proposal, this network includes the retention of all the existing woodland on the development site and is very welcomed, and the current plan meets the objectives of the Scottish Governments Policy on the Control of Woodland Removal.	Noted	No action required as a result of this representation.
<b>5. NESTRANS</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
Welcome the emphasis that the development framework places on the creation of a sustainable community	Noted	No action required as a result of this representation.

<p>designed to create a place where people can live and work without relying on private transport.</p>		
<p>Welcome the emphasis on the provision of safe cycling and walking links within and connecting to strategic routes beyond with specific provision for accommodating commuting trips.</p>	<p>Noted</p>	<p>No action required as a result of this representation.</p>
<p>Welcomed that potential bus routes have been considered at this early stage. In order to influence the travel patterns public transport options need to be present from a very early stage of the development.</p>	<p>Noted. Consideration should be given to early public transport delivery as part of the Transport Assessment process.</p> <p>Text should be added to clarify that discussions are still on going with bus operators and that this will be pursued.</p>	<p>Add text under paragraph 5.3.5 and in the delivery section 6.2 to clarify that the developers for the sites will pursue the delivery of public transport provision. It should also be noted that further detail will be provided in the relevant Masterplans.</p>
<p>Note that more detailed modelling is required and welcome the further testing that has been identified on the A96 corridor. It is noted that connections to Hopetoun Grange and Kepplehills Road are proposed and while such connections would be beneficial for public transport provision, it would not be desirable to increase traffic on these routes which are not designed to cope with significant increase in traffic levels.</p> <p>Full examination of the likely impacts of traffic on these routes should be undertaken and consideration given to installing bus gates to maintain access for public transport without increasing general traffic.</p>	<p>Noted: There is the requirement for a detailed transport assessment to inform the junction strategy for the site. This includes the east, south and west access points. Particular consideration should be given to the east of the site given the existing communities.</p> <p>Until such a time as the assessment of these junctions and routes has been agreed, detail as shown on fig 52 is not appropriate.</p>	<p>Fig 52: delete the red circles identifying key access points to the existing road network from the eastern boundary.</p> <p>The easterly connections should be considered further as part of the Masterplan for the relevant phase.</p>

	At this stage these are potential connections that need to be explored and possible mitigation identified. The routes and connections should be shown but the key access point annotation removed.	
Would welcome consideration being given to the creation of a car free or low car development, support for car clubs and provision of car share parking bays in line with the policies of the Regional Parking Strategy.	This is indeed an excellent opportunity and this should be further explored by the developer. This could reduce the reliance on cars and reduce the over dominance of car parking that can sometimes be present in developments.	Add a section that states car clubs or similar will be considered as part of the Masterplan(s) for each site.
Welcome recognition of the requirements of the STF and that contribution will be required in line with the policy set out in the SPG "Delivering Identified Projects through a Strategic Transport Fund.	Noted	No action required as a result of this representation.
<b>6. Transport Scotland</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
It is noted, that the LDP indicates that Masterplan Zone 4 includes OP26 (Craibstone North and Walton Farm) and OP28 (Rowett North) in addition to the sites identified above.	OP26 and OP28 will be covered by separate Masterplans from the Newhills site; table 6 on of LDP notes this.	No action required as a result of this representation.
Transport Scotland understood that the requirement for the Masterplan Zone 4 was that developers would be expected to work together to prepare Masterplans for each zone and coordinate the planning and delivery of associated infrastructure requirements. The last part of this is considered critical.	The developers for sites in the A96 area have agreed to participate in a modelling, costing and delivery programme exercise for roads infrastructure in the A96 corridor, to determine the future delivery of roads improvements. It is expected that this will	Add the following text to the Development Framework: "A traffic modelling exercise is currently being undertaken to identify the impact of all the

	<p>be concluded by October and will inform a junction strategy for the Newhills Development Framework site.</p>	<p>developments in the A96 corridor to the north west of the City. The modelling will inform a strategy which will determine the form, timing, funding, delivery mechanism and the phasing of the necessary improvements to the A96 corridor. The detailed Masterplan(s) will determine design, mitigation and final layout of the Rowett South and Craibstone South sites adjacent to the A96 once the junction strategy and necessary improvements have been determined for the corridor.”</p>
<p>The Newhills Masterplan does not appear to give any consideration to the development areas on the north side of the A96. It also makes statements such as “vehicle access arrangements are still to be determined”, “key connections are being investigated”, “access to the A96 from the site is still to be determined with strategic modelling assessing the impact of these proposals on the local and strategic network” and “until a junction strategy has been fully investigated in detail the form and type of junction arrangement with the A96 cannot be</p>	<p>Noted – see comments above.</p>	<p>As above.</p>



determined”.		
We have received no information on any access strategy to date and it is therefore difficult to make any comment on the Masterplan from a strategic transport perspective, until such an access strategy has been developed and agreed. We would advise that such a process will also need to consider the implications of the access requirements for the proposed Exhibition Centre to the north and the implications arising from the TA for AIBP Phase 2.	Noted – see comments above.	As above.
<b>7. sportscotland</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
<b>Impact on existing sports facilities</b> Sports facilities within the site include a small synthetic pitch, gym and table tennis within the SRUC Campus. The Craibstone Golf Course lies directly to the west of the site boundary and the Forrit Brae playing fields to the east 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 facilities would not be affected.	The AWPR will be located between Craibstone Golf course and the development so it is unlikely there will be any conflict. It is however agreed that where there is a potential conflict of users this will need to be fully assessed and dealt with through the relevant Masterplan.	No action required as a result of this representation.
There is likely to be an increase in use of the existing sports facilities in the area. It is important that existing facilities are not put under undue pressure from increased demand. sportscotland recommends that consideration is given to any upgrade and improvement	Noted: There would only be undue pressure on existing facilities if there is a shortfall on the site. Further analysis has been carried out. Pitch options have been identified in Rowett South and Greenferns.	Amend Framework in accordance with the revised sports pitch diagram.  Add text to Framework

<p>works to existing facilities, as appropriate and by way of developer contributions or legal agreement, to ensure facilities have capacity for both existing and future users.</p>	<p>A games hall (should it be required) has been identified adjacent to the southern school (Appendix 3). The detail of sport provision phasing will be provided as part of the relevant Masterplan.</p> <p>Any off site contributions will be dealt with via a legal agreement for each respective application.</p> <p>The exact pitch requirement will be determined via the relevant Masterplan in discussion with Aberdeen City Council's Education, Culture and Sport Service.</p>	<p>under 5.5 to describe the additional pitch provision which will be subject to detailed input from Education, Culture and Sport in relation to specific requirements for the site. The details will be developed via the relevant Masterplan.</p> <p>Update the pitch provision totals accordingly.</p> <p>Add text to the Framework that states any offsite contribution will be secured via the relevant legal agreement.</p>
<p><b>Neighbourhood space</b> Section 5.5 of the Development Framework sets out the landscape framework for the site covering a variety of open space typologies. Section 5.5.6 refers to 'neighbourhood open space' identifying 40 hectares of space across the site.</p>	<p>Agreed. The function and use of these sites will be developed through the Masterplans for each site.</p>	<p>Add a sentence to 5.5.6 that states further detail for the Neighbourhood Open Spaces will be provided as part of the Masterplan for the relevant site.</p>
<p><i>N1 Craibstone Park and Driveway</i> - Includes reference to the retention of Core Path 38 alignment through the parkland. sportscotland supports this approach alongside aspirations to provide improved links to this and paths</p>	<p>Comment is noted.</p>	<p>Comments will be passed onto the developer.</p>

<p>throughout the wider area which will provide opportunities for active travel and recreation.</p>		
<p>In relation to other 'local open space', reference is made to the need for these to support pedestrian and cycle movements. sportscotland supports the commitment to linking up and providing for these users. Noted that the design principles and functions will be determined at Masterplan or design stage, we would recommend that the Development Framework identifies opportunities to provide for active travel. The provision of paths and the planning for these should, however, consider their use for sports as well as active travel. It is important not to develop active travel in isolation from recreational walking and cycling but to develop an integrated network.</p>	<p>Agreed, add a section under 5.3 Access and Connectivity to explain the opportunities for active travel in greater detail.</p> <p>Further detail on the active travel routes should be provided in the Masterplans, particularly looking at connection into the wider network of desirable routes, such as Dyce Drive.</p>	<p>Add reference to active travel under 5.3 in the Development Framework explaining where they connect to the desirable active travel routes.</p>
<p><i>N3 Brimmond Fields</i> - This space is located to the far west of the site. The Development Framework states it should accommodate playing fields, play zones and associated changing facilities. sportscotland support the inclusion of tree belt planting to protect the amenity of users, although consideration will need to be given to how this is managed adjacent to sports surfaces.</p> <p>The size of this is not stated nor is it outlined what the configuration of sports facilities will be. It is unfortunate this facility will be on the edge of the community, we would suggest that co-locating this with one of the new primary schools to create a facility that is more accessible and could save costs by co-locating changing.</p>	<p>The isolated location of the Brimmond Fields is noted. Revised plans have relocated the pitch provision from Brimmond Fields to the east of the site. An area of playing fields and games hall provision (if required) has also been identified in OP31 adjacent to the primary school. (Appendix 3)</p>	<p>Amend Framework in accordance with the revised sports pitch provision diagram.</p>

<p>As previously mentioned, sportscotland has produced good-practice guidance regarding the design of playing fields and other outdoor sports facilities. We request that this guidance is used at the point that design principles and proposals are being developed.</p>		
<p><i>N4 Hopetoun Meadows</i> - The Development Framework states this neighbourhood space should be a multi-functional area including a variety of open space typologies including Multi-Use Games Areas (MUGAs).</p>	<p>Acknowledged</p>	<p>No action required as a result of the representation.</p>
<p><b>Level of proposed outdoor sports provision</b>  The Development Framework states that 15 hectares of outdoor sports and recreation area will be required. It is not clear, how this is calculated. The Development Framework then attributes 4.5 hectares provision in total which is less than a third of the identified requirement representing a significant shortfall. We do note that the document (e.g. page 10) notes that the topography of the site is such that substantial earthworks would be required to accommodate large areas of playing fields. While accepting we do not know the topography of the site we would request this be explored further to understand to how much could be provided, what size and what the costs and visual impact would be, before this is ruled out.</p> <p>There is a lack of clarity regarding the overall quantum of space. The text refers to a total of 4.5ha then breaks down the different areas contributing to this which do not appear to equate to this (refer to section 5.5.10; areas within text and p60 breakdown.) The delivery of this area</p>	<p>These comments have been covered by responses elsewhere within this Appendix. Clarification was sought and received on the outdoor sports provision. Areas have been identified in two locations across the site that can accommodate Sports Pitches.</p> <p>The pitch provision has been relocated from the Brimmond Fields area to the east of the site adjacent to the A96. (Appendix 3.)</p>	<p>Amend as highlighted elsewhere in the appendix.</p>

<p>is also dependant on the gypsy/traveller site being located in OP31, creating a further degree of uncertainty.</p>		
<p>Four MUGAs are proposed clustered around the primary school areas to off-set the lack of provision of larger facilities. These are intended to measure 37m x 18.5m. While MUGAs are good for providing opportunities for informal activity, they are not a substitute for pitches of appropriate size and surface to allow for training, coaching and match play. While they are a good addition to sports pitches, they are not an acceptable alternative to them.</p>	<p>Additional pitches have now been provided in two locations across the Framework area. Final makeup of these areas will be determined via the Masterplan process for that area and in discussion with the Council's Education, Culture and Sport service.</p>	<p>Relevant amendments have already been recommended elsewhere in this appendix.</p>
<p>In efforts to provide alternative outdoor sports provision more suited to the site's topography, the Development Framework includes a network of cross-country trails (for running, biking, horse riding). These are intended to be wide (5-7.5m) trails, with set track lengths and mixed natural and artificial surfaces for a variety of uses. These will be a good resource for the new community but are not an alternative to other sports uses, e.g. pitches, and the requirement for these needs to be quantified and provided for.</p>	<p>Further analysis has been carried out and pitches and a potential games hall location identified (should the hall be required) (diagram appended to the committee report).</p> <p>Noted: There would only be undue pressure on existing facilities if there is a shortfall on the site. Further analysis has been carried out. Pitch options have been identified in Rowett South and Greenferns. A games hall (should it be required) has been identified adjacent to the southern school (Appendix 3). The detail of sport provision phasing will be provided as part of the relevant Masterplan. Any off site contributions will be dealt with via a legal agreement for each respective application.</p>	<p>Relevant amendments have already been recommended elsewhere in this appendix.</p>

	<p>The exact pitch requirement will be determined via the relevant Masterplan in discussion with Aberdeen City Council's Education, Culture and Sport Service.</p> <p>Please note as described in 5.5.10 the corridors accommodating the routes are 5-7.5m wide, however the trails themselves would be of an appropriate scale to the surrounding landscape and likely to be 2-3m wide.</p>	
<p>In terms of 'off-site' contributions, the document states these will be reviewed at the Masterplan stage in consultation with the Planning Gain Team. Given the difficulties in identifying sites for pitch facilities within the Development Framework boundary, sportscotland suggests that further consideration needs to be given to the extent to which sports needs can be met on site (e.g. by using synthetic surfaces which provide greater capacity) or whether the needs of those living in the new community will need to be met off site at nearby facilities, and if so, whether there is the capacity to do so or whether new capacity requires to be created.</p>	<p>As highlighted in the comments above additional land within the site has been identified for sport pitch provision.</p> <p>Possible locations have been identified for offsite contributions within the close vicinity of the site should they be deemed necessary.</p>	<p>Relevant amendments have already been recommended elsewhere in this appendix.</p>
<p>The Development Framework refers to 'additional indoor sports area' within the Scotland's Rural College SRUC including a 470sqm main hall with gym and changing which will be open for community use. Clarification as to the delivery mechanisms for this facility would be useful, and it's intended use. sportscotland has produced good</p>	<p>SRUC/Cala will provide detail of delivery mechanism through subsequent Masterplan.</p>	<p>Forward comments to agents and advise that further detail required within the Craibstone Masterplan.</p>

<p>practice guidance for the provision of sports facilities and we suggest this be used in developing the design of this.</p>		
<p><b>New Schools</b>  Section 5.6.9 state that 2 new primary schools will be provided. Consideration should be given to whether either of the schools could also meet some of the community need for sports facilities, e.g. sports halls, gym, pitches etc.</p> <p>The two primary schools are proposed to be 1 three stream and 1 two stream school. In order to deliver P.E., the requirement for sports spaces is greater than a single stream school and we suggest that reference be made to sportscotland’s guidance (in relation to internal sports areas and external pitches) in the detailed design of the schools.</p>	<p>Further detail on the facilities in each school will be provided within the relevant Masterplan in discussion with Education, Culture and Sport.</p>	<p>The information provided will be forwarded onto the design team for information and action at the relevant stage of the planning application/Masterplan process. – add text accordingly to the Framework.</p>
<p><b>Phasing and Delivery</b>  There is no reference within Chapter 6 ‘Phasing strategy and delivery’ on the requirement for sports facilities, nor co-location of these within schools. While, as described, it is appreciated that the scope and extent of infrastructure requirements will be developed as planning applications and Section 75 agreements come forward, the included table is intended to summarise these requirements. sportscotland would encourage the inclusion of outdoor sports facilities at this stage to provide a more robust approach in safeguarding their delivery through Masterplan and application steps.</p>	<p>The sports facilities within the school grounds will be delivered alongside the schools. The detail of sport provision phasing will be provided as part of the relevant Masterplan.</p> <p>The Development Framework should also include the open space provision in the phasing strategy for the site.</p>	<p>Add a phasing strategy that includes open space delivery.</p> <p>Add text to state that details on housing, sport and open space phasing will be dealt with through the relevant Masterplan for each site.</p>
<p>We note the Primary School is identified as being</p>	<p>Agreed, the delivery of sport facilities</p>	<p>Add a note within the</p>

<p>delivered by ACC with planning gain / contributions from landowners and developers. It is assumed this includes associated sports facilities and sportscotland would again note our guidance documents in terms of level of provision and design for these elements.</p>	<p>should be tied to the delivery of the school.</p>	<p>document that confirms the sports facilities will be delivered at the same time as the school. The guidance note will be passed onto the developers.</p>
<p><b>8. SNH</b></p>		
<p><i>Summary of Representations</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>Welcome the consideration that has been given to open space and access throughout the framework and particularly support the emphasis on active travel with links to nearby employment centres.</p>	<p>Comments noted.</p>	<p>No action required as a result of this representation.</p>
<p>The development framework will be adopted as supplementary guidance to the Local Development Plan and as such needs to be considered in terms of HRA. Although the site does not lie within the catchment of the River Dee SAC, water to supply the proposed 4400 new houses will be abstracted from the River Dee. Reductions in river water levels can have impacts on freshwater pearl mussel one of the qualifying features of the SAC. We therefore advise that there is connectivity between this development framework and the SAC.</p> <p>The recently approved Aberdeen City and Shire Strategic Development Plan (SDP) considered this issue and contains measures designed to avoid any likely significant effects on the SAC. These safeguards include:  - Lower-tier plans and strategies should undertake HRA</p>	<p>Comments agreed.</p>	<p>Must include a statement that Water Saving Technologies and Water Efficiency will be incorporated within the development. Further detail on this topic will be provided within the relevant Masterplan for each site.</p> <p>Add text that states a Water Efficiency Statement will be required in each subsequent planning application detailing the measures employed to demonstrate</p>



<p>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.</p> <p>In line with the above we advise that if a statement requiring water saving technologies and water efficiency is included within the development framework a likely significant effect on the qualifying interests can be avoided and an appropriate assessment will not be required.</p> <p>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.</p>		<p>that they would not have a significant effect on the qualifying interests.</p>
<p>Note that there is a simultaneous consultation on an application for planning permission in principle for Craibstone South. We expect that the development framework and subsequent masterplans for each individual development site are finalised and approved before PiP 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.</p>	<p>Agreed.</p>	<p>No action required as a result of this representation.</p>
<p><b>Sustainability Issues</b>  As advised in the main letter, the development framework</p>	<p>Agreed</p>	<p>Must include a statement that water saving</p>

<p>should include a statement encouraging water efficiency and water saving technologies in order to prevent a likely significant effect on the River Dee from water abstraction.</p>		<p>technologies and water efficiency will be incorporated within the development.</p>
<p><b>Access and Connectivity</b>  We welcome the consideration and proposed linkages with strategic onwads connections both traffic free and dual use. The framework promotes good linkages with existing recreational, employment and transport links including the two existing and one aspirational core paths.</p> <p>Safe crossing points onto and across the A96 and access routes over the AWPR will be important considerations.</p>	<p>Agreed. Further detail should be provided in relation to the crossing of the A96 within the Masterplans. There are currently underpasses connecting the land to the north and south of the A96, these will be retained and enhanced. Further consideration to the connections must be considered as part of the detailed Masterplan and transport modelling exercise.</p> <p>Proposed routes to cross the AWPR from the east have been identified as part of the mitigation scheme for the AWPR. These should be shown on a plan within the Framework to ensure connectivity.</p>	<p>Add text under 5.3 that state Masterplan(s) for OP29 and OP30 will be required to provide further detail in relation to the delivery, enhancement and phasing of the ped/cycle crossing points over the A96. Taking into account the transport modelling exercise outcomes.</p> <p>Add a plan under 5.3 to show the AWPR crossings in the vicinity and how this Newhills Development Framework area connects into them.</p>
<p><b>Landscape Framework</b>  Agree that the retention of existing woodland and tree lines will help to define neighbourhoods and the boundary of open space areas. We advise that further structural planting would increase connectivity throughout the site, tying into the existing woodland to the north and west and new planting associated with the AWPR.</p>	<p>Additional planting would be of benefit across the site. More detailed planting should be identified within the Masterplan for each site.</p>	<p>Add text under 5.5 that confirms further detail on the open spaces and the landscaping will be provided within the relevant Masterplan.</p>

<p><b>Open Space</b>  Open space within the framework is defined as major, neighbourhood or local in addition to green space network areas. We support the concept of a matrix of inter-connected open space linking the framework area from north to south and east to west. We advise that priority should be given to addressing deficits in the type and quality of open space identified in the open space audit. For this area these include a lack of neighbourhood parks and natural / semi-natural greenspace.  We recommend:  - Additional tree planting within open space areas, widening shelterbelts and tree avenues and connecting these with existing woodland.  - Management of open habitats within Burnbrae Commons and neighbourhood parks as natural / semi-natural greenspace instead of amenity grassland.</p>	<p>Agreed text should be added to confirm that these will be considered in more detail as part of the Masterplan Process.</p>	<p>Add text to the Framework that confirms that additional tree planting will be considered within the Masterplans to provide connectivity to the woodland blocks.</p>
<p><b>Potential for biodiversity enhancement</b>  Section 5.5.2 recognises the framework has a role in maintaining and creating connections between habitats and avoiding fragmentation. We recommend that more emphasis is required on increasing biodiversity through the design of open space.</p>	<p>The Development Framework should state that biodiversity improvements will be considered across the whole site as part of the detailed Masterplans.</p>	<p>Add text under 5.5 to show the commitment across the site for the improvement to biodiversity.   Add text that confirms further detail on biodiversity will be provided as part of the detailed Masterplans.</p>
<p>Increasing the extent of woodland within open/green space would contribute to one of the key considerations of the development framework which is the protection</p>	<p>Agreed: the Development Framework shows the extensive open space and green connections throughout the site.</p>	<p>Add detail into section 5.5 of the Framework that highlights further</p>

<p>and enhancement of biodiversity capital. Even a band of trees 10m wide (3 or 4 trees) is sufficient to act as a wildlife corridor for species such as bats and red squirrels. Planting of larger woodland blocks would provide greater benefits for wildlife movement and strategic landscaping than simply retaining and extending tree lines. Reference to LBAP species and habitats could be used to promote and enhance habitats in preference to merely maintaining what's already there.</p>	<p>This opportunity has been taken in some areas but could be made more of in others. The Landscape Features section on page 47 highlights the importance of the woodland structure within the site.</p> <p>The landscape strategy will provide more detail as will the relevant Masterplans.</p>	<p>consideration will be given to the provision of wildlife corridors as part of the relevant Masterplans.</p>
<p>There is the potential to naturalise the drainage channel along the southern boundary at Burnbrae Moss and create wetland habitats. This would benefit a number of LBAP species and habitats.</p>	<p>On page 56, bullet point 5 the Framework states there is potential to improve character and biodiversity of the drainage channel which defines southern boundary.</p> <p>Additional text should be added to confirm that this will be looked at in more detail as part of the Masterplan for OP31.</p>	<p>Add text under - M2. Burnbrae Commons (page 56) that states the creation of a wetland habitat will be looked at for Burnbrae Moss as part of the Masterplan for OP31.</p>
<p>We support the proposal to restore the watercourse to the north of Kepplehills Road by de-culverting and suggest that a more natural channel could be created, providing a wetland feature for the Kepplehills Green open space.</p>	<p>Noted this should be further investigated as part of the Masterplan for OP31.</p>	<p>Add an additional bullet point under N5. Keppleshill Green which states there is potential to create a wetland feature in this area.</p>
<p>The loss of an area of green space network at Brimmond Fields through conversion to playing fields should be compensated for by the creation of a similar sized area of green space elsewhere within the framework area.</p>	<p>Policy NE1 confirms that Masterplanning of new developments should determine the location and extent of the Green Space Network within these allocated sites. The connections and green space areas that have been shown within the Development Framework are more extensive than the</p>	<p>No action required as a result of this representation.</p>

<p>Other methods of increasing biodiversity benefits within residential and local open space areas include:</p> <ul style="list-style-type: none"> <li>- Planting of areas of species rich grassland or meadow. Not only can these be attractive areas, they requires less frequent cutting than typical amenity grassland.</li> <li>- Nectar rich species of plants. These could be planted to benefit bees in residential and business areas, neighbourhood and local parks.</li> <li>- 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 Institute<sup>1</sup></li> <li>- Planting of street trees.</li> </ul>	<p><b>Green Space Network in the LDP.</b></p> <p>The Development Framework should state that biodiversity improvements will be considered throughout the whole site.</p> <p>It is more appropriate for individual Masterplans to consider this in more detail.</p>	<p>These comments will be passed onto the developer.</p> <p>Add text under 5.5 to show the commitment across the site to improve biodiversity, with detail being considered further as part of the Masterplan for each phase of development.</p>
<p><b>9. SEPA</b></p>		
<p><i>Summary of Representations</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>Though outwith the flood map the site has a number of small watercourses that may be at risk of flooding.</p>	<p>Noted</p>	<p>Comments passed onto the developers.</p>
<p>A Flood Risk Assessment (FRA) for the Gough Burn is required as part of the planning application which also takes into account the smaller unnamed water courses and existing drainage network within the site.</p>	<p>Subsequent discussions have taken place between the Developers and SEPA and it has been confirmed that a FRA is not required for the Development Framework. The Flood Risk Assessment should be carried out as part of the Masterplan for the relevant site.</p>	<p>Add text to the Development Framework under 5.8 that confirms any Flood Risk Assessment will be carried out as part of the detailed Masterplan Process for the relevant site.</p>
<p>SPP should be followed in relation to drainage ditches and culverts and therefore watercourses should not be</p>	<p>Noted</p>	<p>Comments passed onto the developers.</p>

<p>culverted unless there is no practical alternative. Additionally existing culverts should be opened up.</p>		
<p>As this is a large development on a greenfield site we would advise that the potential for flooding to be increased elsewhere should be considered as part of the FRA. This is particularly important as part of the site may be at risk from surface water flooding, and the Masterplan walkover highlighted evidence of overland flow being an issue at the site. We support the proposal that potential surface water flooding will be incorporated into the drainage design.</p>	<p>Noted: The potential issue of surface water flooding should be considered as part of any FRA.</p>	<p>Comments passed onto the developers.</p>
<p>We would strongly advise that any water course crossings follow good practice guidelines and should be adequately sized to enable them to convey the 1 in 200 year design flow at each point without causing constriction of flow or exacerbation to flood risk elsewhere. A Good Practice Guide for River Crossings can be found on the SEPA website</p>	<p>Noted</p>	<p>These comments and details of the guide will be passed onto the developers.</p>
<p>We therefore recommend that a FRA is prepared prior to finalisation of the Development Framework and look forward to providing advice once more detailed flood risk information is available.</p>	<p>Subsequent discussions have taken place and it has been confirmed that a FRA is not required as part of the Development Framework. The Flood Risk Assessment should be carried out as part of the Masterplan for the relevant site.</p>	<p>Add text to the Development Framework under 5.8 that confirms any necessary Flood Risk Assessment will be carried out as part of the detailed Masterplan Process for the relevant site.</p>
<p><b>Watercourses Environmental management</b> We support the recognition that existing watercourses and drainage channels on the site ranging from the Gough Burn to functional agricultural drainage ditches</p>	<p>Comments have been forwarded onto the developers for action.</p>	<p>Add text to 5.5.12 to state that appropriate buffers will be provided between the</p>

<p>should be retained and appropriately sized buffer strips should be provided. This should include appropriate buffers between allotments and watercourses to minimise risk of nutrient pollution from fertilisers or siltation due to overland flow from bare soil.</p>	<p>Further details will be provided within any relevant Masterplan.</p>	<p>allotments and any watercourse.</p>
<p>We request that wetlands on the site are also identified and protected with mitigation including appropriately sized buffer strips.</p>	<p>Agreed: Any wetlands within the site should be identified on a plan under section 5.5.</p>	<p>Add text that states additional information on wetland enhancement and improvement will be provided as part of the relevant Masterplan.</p>
<p>We note that the Gough Burn and all the smaller tributaries drain to the Green Burn. We note that the Stoneywood Papermill actively abstracts water from the Green burn at the mid east boundary of the site. The water supply to Stoneywood Mill is extremely susceptible to any potential silt pollution of the Green Burn via the Gough Burn and any of the smaller tributaries that drain into the Green Burn including from construction activities.</p>	<p>Noted</p>	<p>These comments will be passed onto the developers.</p> <p>Add text: Construction and Environmental Management Plans will be required for any subsequent planning application.</p>
<p>We note that small watercourses and field drains within OP30 and OP31 drain to the River Don which is an important habitat for salmon and must also be adequately protected from silt pollution. During, wetter winter months it is very likely that there is a very good flow in these ditches which can become an issue if not managed adequately.</p>	<p>Noted</p>	<p>These comments will be passed onto the developers.</p> <p>Construction and Environmental Management Plans will be required for any subsequent planning application.</p>
<p>We strongly support the suggestion that the existing culvert should be opened up to form part of N5</p>	<p>Noted</p>	<p>Comments will be passed onto the developers.</p>

Kepplehills Green and recommend that a more natural channel should be created with associated wetlands.		
We also recognise the potential to naturalise the drainage channel along the southern boundary at Burnbrae Moss and create wetland habitats.	Further detail on this will be provided as part of the detailed Masterplan for each site/phase.	Comments will be passed onto the developers.
We <b>support</b> the proposals for SUDS features to be integrated into the wider landscaping throughout the sites.	Noted	No action required as a result of this representation.
We will require detailed, site specific and plan based construction environmental management plans for all applications. These must include an assessment of ground conditions, appropriately designed temporary construction stage SUDS installed first, on-site monitoring including weather forecasts and emergency action contingency plans for a spillage response.	Noted text should be added to the Development Framework accordingly.	Add text to the Development Framework stating the requirement for a site specific, plan based construction environmental management plan as part of the detailed application for any part of the site.
<b>Foul Drainage</b> We agree that Persley sewer requires upgrading prior to the commencement of development and understand that agreement will require to be reached with Scottish Water regarding connections.	Noted	No action required as a result of this representation.
<b>Flood Risk</b> We refer the applicant to the document entitled: " <i>Technical Flood Risk Guidance for Stakeholders</i> ". Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding.	Noted	These comments will be forwarded onto the developers for their information and action.



<b>10. Historic Scotland</b>		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
<p>I welcome the recognition within the Development Framework of the need to protect and enhance the historical assets within and in the vicinity of the Framework area. As noted in the Development Framework there are three Category B listed boundary markers within the OP30 section of the site and I welcome that further specific cultural heritage assessment will be carried out. This provides opportunity to consider how to suitably incorporate these into the development.</p>	<p>Agreed; the Masterplan for site OP30 should consider how best to incorporate the B listed boundary markers into the site. The cultural heritage section for the whole site is to be updated on page 27 to include more information and detail on topics such as Archaeology, the addition of this text should be added here.</p>	<p>Add text to cultural heritage section stating that the incorporation of the B listed boundary markers will be considered as part of the Masterplan for OP30.</p>
<b>Internal ACC</b>		
<p>Information in the Framework is not sufficient to cover the archaeology or cultural heritage of the site. Larger developments need to consider the scope for incorporating combined heat and power schemes (CHP) as highlighted in the SDP.</p>	<p>Noted: further consideration should be given to promote sustainability and minimise carbon emissions. Additional information should be provided to how the development has considered this approach and will meet the necessary standards.</p>	<p>Additional text should be added to the Development Framework/ Masterplan to explaining what is being done in Newhills to meet the carbon reduction targets</p>
<p>Lack of energy efficiency statement or mention of energy saving technology, additional text should be added.</p>	<p>An updated statement has been submitted.</p>	<p>Incorporate the revised text in the Development Framework.</p>