

Laura Robertson

Subject: FW: Newhills Development Framework

Subject: Newhills Development Framework

Hello,

This is the response from the Aberdeen Cycle Forum to the Newhills Development Framework.

The Forum is slightly concerned some of the evasive language regarding the cycle links to the proposed development.

While the development is not yet in progress (which we allow makes concrete plans more difficult), the plans for cycle ways cannot end at the boundaries of the development. In order to accommodate larger numbers of potential cyclists commuting from the development, links must be improved to ensure a continuous journey.

At present, the links mentioned in the document rely on dual use paths that are not well marked or are inadequate in width for purpose. If the housing proposed in the document will be assumed to be working in Dyce or Aberdeen, better links in a north east and south west direction should be available.

The NCN1 is in proximity to the site, but it is not useful for commuting purposes to most desired points.

The Forum looks forward to more concrete plans for cycle infrastructure connecting the development. We also hope that all infrastructure will undergo scrutiny from a cycling perspective before infrastructure is realised.

Cheers,

Jyll Skinner
Chair, ACF

Newhills Development Framework

February 2014

Comments from Bucksburn & Newhills Community Council

Initially we would like to congratulate the Planning Department on producing a high quality document that is easily read and understood, even though we may still have comments to make on some of the content.

Please find detailed below the comments we would wish you to reconsider in the Framework.

1)**Community Facilities (Page 10)** : 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.” We are not in a position to argue against that but you should be aware that we are constantly receiving complaints from local sports groups who used to be able to play on pitches in the area of the new school, prior to the school being built. Whether it is because the new school does not belong to the local authority or not, they are now being denied access to the pitches and some local teams are now having to play their home matches in Inverurie. We find that totally unacceptable and think that provision must be made in the expansion area to encourage the return of these teams to Bucksburn/Newhills.

2)**Opposition to Gypsy / Traveller Site (Page 11)** : The Community Council are fully aware of the City Council's requirement to provide facilities for Gypsy Travellers and would not want to be unreasonable in this regard. We would stress however the number of these sites being proposed in, or adjacent to the Newhills Expansion Area and would strongly recommend that if a site has to be included in this area then it is situated on land in the ownership of the Council to the extreme south of OP31.

3)**Community Requirements (Page 12)** : It would appear to us that there is a complete change in regard to provision of a new secondary school for the area and we would wish to appeal against this change. For many years before the change from Bankhead Academy to Bucksburn Academy there was a definite barrier against children from Kingswells coming over to Bucksburn to attend secondary school. We in this community tried hard to break down that obstacle and I think we have been successful, considering the numbers who now make the journey from Kingswells. It would appear that the City Council now want to create the barrier again by saying that children from Kingswells “will be drawn to Countesswells”. To build this new development, bigger than communities like Ellon, and say that the children from it can go to Dyce or Northfield Academies, if there is no room at Bucksburn Academy is short sighted at the least. 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.

4)**Aberdeen Exhibition and Conference Centre:** Although to be situated in Rowett North this appeared at a very late stage in proceedings, much to the surprise of the Community Council. It would appear retrospectively, that discussions were being held with the Airports Authority for a number of years prior to it becoming public knowledge and for a matter of this significance, this is disappointing. The obvious concerns of the Community Council are obviously related to traffic, mainly going to and from the venue and noise for those living nearest to the new buildings.

Charles Shepherd (Planning Officer for Community Council)

2nd April 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: 0141 414 7778
E: susanne.steer@scottishwater.co.uk
W: www.scottishwater.co.uk

Dear Development Plan Team,

Newhills Expansion Area Development Framework: Statutory Public Consultation

I write with reference to your letter dated 17th of March 2014, requesting comments in relation to the above consultation.

As identified in the Newhills Development Framework, the project team have been in contact with Scottish Water to discuss this development. As a result of this engagement Scottish Water have no issues with the information provided in the document in relation to water and drainage.

In regards to water infrastructure, this development has been taken into account for the mains upgrade from Fernhill District Service Reservoir (DSR) to Dyce. The original main from Fernhill DSR to Dyce was upsized to accommodate the Craibstone, Rowatt and Greenferns developments, including the new AECC. A Water Impact Assessment will be required to determine the impact of such a large development on the existing network, and also to identify whether the water will require to be pumped.

Usually a development of this size would call for a Drainage Impact Assessment; however this will not be required as a strategic wastewater study of Aberdeen is being undertaken. This will identify where in the network investment is required.

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 water or drainage infrastructure to be vested by Scottish Water, current design standards will need to be met.

Please contact me should you have any queries.

Yours Sincerely

Susanne Steer
Development Planner

Laura Robertson

From: PI
Sent: 09 April 2014 10:21
To: Laura Robertson
Subject: FW: Newhills Expansion Area Development Framework

From: Cowe, Ian [<mailto:Ian.Cowe@forestry.gsi.gov.uk>]
Sent: 08 April 2014 13:08
To: PI
Subject: Newhills Expansion Area Development Framework

Dear Sir/Madam
Thank you for the opportunity to comment on the Newhills Expansion Area Development Framework.

I recognise that 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, the current plan meets the objectives of the Scottish Governments Policy on the Control of Woodland Removal.

Thank you for your effort in relation to this matter.
Regards
Ian Cowe

Ian Cowe - Development Officer
Forestry Commission Scotland
Portsoy Road
Huntly
AB54 4SJ

Phone: 01224 441664
Mobile: 07973 534979
VoIP: 41664

+++++ The Forestry Commission's computer systems may be monitored and communications carried out on them recorded, to secure the effective operation of the system and for other lawful purposes. +++++

The original of this email was scanned for viruses by the Government Secure Intranet (GSI) virus scanning service supplied exclusively by Cable & Wireless in partnership with MessageLabs.

On leaving the GSI this email was certified virus-free
IMPORTANT NOTICE: This e-mail (including any attachment to it) is confidential, protected by copyright and may be privileged. The information contained in it should be used for its intended purposes only. If you receive this email in error, notify the sender by reply email, delete the received email and do not make use of, disclose or copy it. Whilst we take reasonable precautions to ensure that our emails are free from viruses, we cannot be responsible for any viruses transmitted with this email and recommend that you subject any incoming email to your own virus checking procedures. Unless related to Council business, the opinions expressed in this email are those of the sender and they do not necessarily constitute those of Aberdeen City Council. Unless we expressly say otherwise in this email or its attachments, neither this email nor its attachments create, form part of or vary any contractual or unilateral obligation. Aberdeen City Council's incoming and outgoing email is subject to regular monitoring.

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

Newhills Expansion Area Development Framework – Consultation Response

Thank you for the opportunity to comment on the Newhills Development Framework. Nestrans welcomes the publication of this development framework and in particular the emphasis it places on the creation of a sustainable community designed to create a place where people can live and work without relying on private transport.

We welcome the emphasis that has been placed on the provision of safe cycling and walking links, not just within the development but linking to strategic routes and other destinations with specific provision for accommodating commuting trips. Such connections, in place in the early phases of the development will be vital in encouraging travel by sustainable modes.

As well as walking and cycling, bus service provision makes up a key part of the access strategy and key to ensuring sustainable travel both within and to/from the site. It is welcomed that potential bus routes have been considered at this early stage. In order to positively influence the travel patterns of residents and those working within the site, these travel options need to be present from a very early stage of development, recognising that it will take time for demand to increase.

In terms of the road access strategy, we recognise that more detailed modelling is required and welcome the further testing that has been identified on the A96 corridor, Bucksburn junctions, Kingswells junction and Craibstone junction. It is noted that connections to Hopetoun Grange and Kepplehills road are proposed and while such connections will be beneficial for public transport provision it would not be desirable to increase traffic on these routes which are not designed to cope with significantly increased levels of traffic. 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.

There is limited reference to parking provision in the Development Framework and 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".

Thank you again for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read "Kirsty Chalmers". The signature is written in a cursive style with some loops and flourishes.

Kirsty Chalmers
Transport Executive (Strategy & Delivery)

Laura Robertson

From: PI
Sent: 28 April 2014 11:38
To: Laura Robertson
Subject: FW: Newhills Expansion Area Development Framework - Statutory Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

From: Lesley Logan [<mailto:Lesley.Logan@jmp.co.uk>]
Sent: 25 April 2014 15:58
To: PI
Cc: Jason Gillespie; Malcolm.Forsyth@transportscotland.gsi.gov.uk
Subject: FW: Newhills Expansion Area Development Framework - 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 the development of 4,440 homes in the period to 2030 over three adjoining sites totalling around 220 ha; identified as OP29 Craibstone South (1,000 homes), OP30 Rowett South (1,940 homes) and OP31 Greenferns Landward (1,500 homes), collectively referred to as Newhills. It is noted however, 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.

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 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 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.

We trust these comments are of assistance, however, we would be happy to have further discussion on the access strategy as and when information becomes available.

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

[D] 0141 226 6942

Newhills Development Framework

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 guidance on *Pitches and Pavilions*. These are available in the Facilities section of our web site.

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 web site.

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 Newhills are provided below. For clarity, we have grouped comments thematically.

Impact on existing 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.

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 these facilities 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 to the eastern boundary, will be required to assist in protecting the future amenity of all users. We would highlight that **sportscotland** is a statutory consultee where development will affect the operation of pitches or golf courses and that we should be consulted when the planning applications in this area are made.

Reference is made within the Development Framework to establishing connections with existing community centres and amenities, including Craibstone Golf Club and Brimmond Country Park. Other sports facilities and recreational areas not within the site boundary, but within the local area include:

- Beacon Centre, Bucksburn Community Campus - multi-activity sports hall, dance studio, gym and squash court;
- Bucksburn Pool, Bucksburn Community Campus;
- Newhills Primary School – new build school with associated sports facilities currently under construction;
- Kirkhill Forest – orienteering course, walking trails, mountain bike fun park; and
- Tyrebagger Forest – walking and cycling trails, links to 'Aberdeen Four Hills Walk'

Given the scale of growth in the number of local residents that would result from the delivery of the Newhills 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 increased demand.

sportscotland recommends that consideration is given to any upgrade and improvement 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.

Neighbourhood space

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. While it is appreciated that the precise function and character of these will be determined at masterplan stage, the framework provides principles to be considered for each space.

N1 Craibstone Park and Driveway - 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 throughout the wider area which will provide opportunities for active travel and recreation.

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. While it is appreciated 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, while similar they are not the same. It is important not to develop active travel in isolation from recreational walking and cycling and the aim should be developing 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.

N3 Brimmond Fields - 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. The site is noted for its suitability due to existing levels and potential low ecological value. **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.

The size of this is not stated nor is it outlined what the configuration of sports facilities will be. The area may be reduced if the gypsy/traveller site is located here. It is considered unfortunate that this facility will be located on the edge of the community, we would suggest that co-locating this with one of the new primary schools would create a facility that is more accessible to the community and could save costs by co-locating changing etc at the school. Careful consideration will need to be given to the make up of the area to ensure maximum sporting benefit is delivered.

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 for sports facilities at Newhills in order to ensure that they are appropriately designed for school and/or community use.

N4 Hopetoun Meadows - 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).

Level of proposed outdoor sports provision

The Development Framework states that 15 hectares of outdoor sports and recreation area will be required (section 5.5.10). It is not clear, however, 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 (eg 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.

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 is also dependant on the gypsy/traveller site being located in OP31, creating a further degree of uncertainty.

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 and match play. Due to their size and surface they are also unlikely to be suitable for the provision of coaching and they cannot be programmed and managed as easily as larger pitches. While they are a good addition to sports pitches, they are not an acceptable alternative to them.

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, eg pitches, and the requirement for these needs to be quantified and provided for.

In light of the above comments, **sportscotland** requests that the required level of provision and amount proposed through the framework is fully clarified.

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 (eg 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.

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 practice guidance for the provision of sports facilities and we suggest this be used in developing the design of this.

New Schools

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, eg sports halls, gym, pitches etc.

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.

Phasing and Delivery

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.

We note the Primary School is identified as being 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.

Thank you for your consultation on the Newhills Development Framework and we would encourage the Council to 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, lorraine.jones@sportscotland.org.uk



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]

28 April 2014
Our ref: CPP129881

Dear Laura

Newhills Development Framework: Statutory Public Consultation

Thank you for letter of 17 March 2014 informing us of the above consultation.

We support the production of a single development framework covering the large residential and mixed use developments at Craibstone South, Rowett South and Greenferns Landward. We 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. We broadly support the measures proposed and make several recommendations to augment these in the attached annex. We also make recommendations to enhance the benefits for biodiversity.

Habitats Regulations Appraisal – River Dee SAC

The development framework will be adopted as supplementary planning 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, particularly at times of low flow conditions 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.

The site's status means that the requirements of the Conservation (Natural Habitats &c.) Regulations 1994, as amended (the "Habitats Regulations") apply. Consequently, Aberdeen City Council is required to consider the effect of the proposal on the River Dee SAC before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (<http://www.snh.gov.uk/docs/A423286.pdf>).



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 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 local development plans and other supplementary guidance to 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 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. 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. 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. 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 for the Craibstone South section of the framework area. 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.

For further information or advice in connection with this proposal please contact Fiona Mutch at this office or fiona.mutch@snh.gov.uk.

Yours sincerely

Ewen Cameron
Operations Manager
Tayside & Grampian

Annex

The Development Framework

Sustainability Issues

As advised in the main letter, the development framework 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.

Access and Connectivity

We welcome the consideration and proposed linkages with strategic onwards 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.

Safe crossing points onto and across the A96 and access routes over the AWPR will be important considerations.

Landscape Framework

We suggest this section is renamed landscape and open space framework.

The landscape character of the north of the framework area is heavily influenced by the mature policy woodland of Craibstone and along the Gough Burn. The centre and south of the area contains shelterbelts and lines of trees along field boundaries. We 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.

Open Space

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 to provide larger connected woodland blocks, 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.

Potential for biodiversity enhancement

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.

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 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 Local Biodiversity Action Plan species and habitats could be used to promote and enhance habitats in preference to merely maintaining what's already there.

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.

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.

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.

Other methods of increasing biodiversity benefits within residential and local open space areas include:

- Planting of areas of species rich grassland or meadow. Not only can these be attractive areas, they require less frequent cutting than typical amenity grassland.
- Nectar rich species of plants. These could be planted to benefit bees in residential and business areas, neighbourhood and local 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.

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



Our ref: PCS/132335
Your ref: MDC/DF/Newhills/con

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

If telephoning ask for:
Clare Pritchett

29 April 2014

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

Dear Ms Robertson

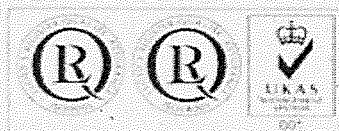
**Town and Country Planning (Scotland) Acts
Statutory Public Consultation: MDC/DF/Newhills/con
Newhills Expansion Area Development Framework:
OP29 Craibstone South, OP30 Rowett South, and OP31 Greenferns Landward**

Thank you for your consultation email of 14 March 2014. We have the following comments on the Development Framework (February 2014).

Advice for the planning authority

1. Flood risk

- 1.1 We have reviewed the information provided in this consultation and it is noted that, although the site appears to lie out with the SEPA Flood Map, the application site has a number of small watercourses within it and consequently the site may be at risk of flooding.
- 1.2 Scottish Planning Policy (SPP) states in paragraph 203, that "For planning purposes the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year. Development on the functional flood plain will not only be at risk itself, but will add to the risk elsewhere." Built development should not therefore take place on the functional flood plain.
- 1.3 Small watercourses are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment of this scale. SEPA holds a wealth of information on past small catchment flooding in Scotland which has led to significant impacts upon people and property.
- 1.4 We note from Section 2.8.4 of the Newhills Masterplan that a site walkover was carried out, where it was thought that water would remain in or close to the bank during a flood. However, for a development of this scale, we would **object** to a planning application without the submission of a FRA. The FRA should include an assessment of Gough Burn



Chief Executive
David Sigsworth
Chief Financial Officer
James Curran

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

which runs through the middle of OP30, and also take into account the smaller unnamed water courses and existing drainage network within the site.

- 1.5 As the site includes a number of small drainage ditches and culverts we would advise that Scottish Planning Policy is followed and therefore watercourses should not be culverted as part of a new development unless there is no practical alternative. Additionally existing culverts should be opened whenever possible.
- 1.6 We would highlight that culverts are a frequent cause of local flooding, particularly if design or maintenance is inadequate. Although not within the boundary of the proposed development, we do have records of flooding caused by blocked drains/culverts in the residential areas adjacent to the proposed site that some of the smaller watercourses drain into.
- 1.7 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. The Roads Department of Aberdeen City Council can advise further on this matter.
- 1.8 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 http://www.sepa.org.uk/water/water_regulation/guidance/engineering.aspx.
- 1.9 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.

2. Watercourses - Environmental Management and Pollution Prevention

- 2.1 We **support** the recognition that existing watercourses and drainage channels on the site ranging from the Gough Burn to functional agricultural drainage ditches 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.
- 2.2 We **request** that wetlands on the site are also identified and protected with mitigation including appropriately sized buffer strips. Wetlands in the water environment are protected under WEWS (2003) Part 1; Groundwater dependent and surface water dependent wetlands. This protection also includes wetlands outside designated nature conservation sites. We **recommend** using 'SNIFFER (2009) A Functional Wetland Typology for Scotland' available at http://www.sepa.org.uk/science_and_research/what_we_do/biodiversity/wetlands.aspx to help identify wetlands that may be positively or negatively impacted by development proposals.
- 2.3 We note that the Gough Burn and all the smaller tributaries drain to the Green Burn. We note that the Stoneywood Papermill (NJ 8979 1104) actively abstracts water from the

Green burn at the mid east boundary of the site (NJ 8899 1062) where a small building controls a weir and valve assembly which typically draws off under gravity about one third of the flow in the burn. This water is then fed down to the Stoneywood pond. The pond is filled by a major abstraction from the River Don mill lade and the abstraction from the Green Burn keeps the pond topped up. The pond provides storage and pre-treatment of water before it gravity feeds down to the mill's water treatment plant (WTP). Therefore the water supply to the 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.

- 2.4 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.
- 2.5 We strongly **support** the suggestion that the existing culvert should be opened up to form part of N5 Kepplehills Green and **recommend** that a more natural channel should be created with associated wetlands.
- 2.6 We also recognise the potential to naturalise the drainage channel along the southern boundary at Burnbrae Moss and create wetland habitats.
- 2.7 We **support** the proposals for SUDS features to be integrated into the wider landscaping throughout the sites.
- 2.8 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.

3. Foul Drainage

- 3.1 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.

Detailed advice for the applicant

4. Flood risk

- 4.1 We refer the applicant to the document entitled: "*Technical Flood Risk Guidance for Stakeholders*". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from www.sepa.org.uk/flooding/planning_flooding.aspx. Please note that this document should be read in conjunction Policy 41 (Part 2). Our 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. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from http://www.sepa.org.uk/flooding/planning_flooding/fra_checklist.aspx.

Regulatory advice for the applicant

5. Regulatory requirements

- 5.1 Details of regulatory requirements and good practice advice for the applicant can be found on our website at www.sepa.org.uk/planning.aspx. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office.

If you have any queries relating to this letter, please contact me by telephone on 01224 266609 or e-mail at planning.aberdeen@sepa.org.uk.

Yours sincerely

Clare Pritchett
Senior Planning Officer
Planning Service

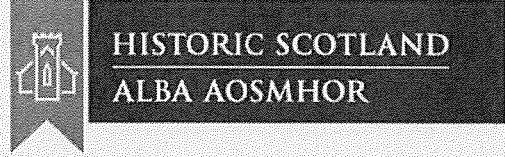
Disclaimer

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 prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. 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. If you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found in [How and when to consult SEPA](#), and on flood risk specifically in the [SEPA-Planning Authority Protocol](#).

Caveats

The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit http://www.sepa.org.uk/flooding/flood_maps.aspx.

The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to Aberdeen City Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: "Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities" outlines the transitional changes to the basis of our advice inline with the phases of this legislation and can be downloaded from www.sepa.org.uk/planning/flood_risk.aspx.



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: 201307575

24 April 2014

Dear Ms Robertson

Newhills Expansion Area Development Framework Consultation

Thank you for your consultation of 14 March seeking our comments on the above Development Framework. 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 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 on this site as part of an Environmental Impact Assessment. This assessment will offer the opportunity to consider how to suitably incorporate these designations within the detailed design of the area.

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)

