

Your ref:  
Our ref: 50200620-030/CLB/KD/131111



11 November 2013

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Dear Sir / Madam,

**Proposed Aberdeen Energy Park Expansion, Energy Park, Aberdeen  
Transport Assessment**

I write with regard to the Planning Permission in Principle Ref. No. 131483 to extend the Aberdeen Energy Park (AEP) to provide 48,000m<sup>2</sup> of office/ industrial/ warehouse floor space and, in particular, the Transport Assessment produced by Fairhurst in support of the application.

You will be aware that the Aberdeen Energy Park Expansion site is proposed for land which is agriculture in nature, located to the immediate north of the existing Park and south of the proposed Berryhill development. The A90 is sited to the west with the Aberdeenshire coast line located to the east.

The previous application for 32,381m<sup>2</sup> of Class 4 Business Development was submitted in 2006 and received outline planning consent in 2007. Since development did not commence within the five years from the point of approval, we understand this application has now expired. Under the current application reference no. 131482 it is proposed that the site will now be developed to accommodate up to 48,000m<sup>2</sup> of office and warehousing facilities.

On behalf of Berryhill 1 Limited, we have undertaken a review of the Fairhurst Transport Assessment (TA) dated October 2013 submitted in support of the above application. We are concerned by a number of points within the TA including: certain commentary pertaining to infrastructural contributions to be provided by the Berryhill site; the approach used to assess the travel demand; and, in particular, that the TA is only assessing the level of trip generation associated with the uplift in development from the previously consented, but now expired, planning application.

The bullets below highlight the main items in the TA with which we have concerns. These are dealt with in order as they arise in the TA report.

- Chapter 2 discusses the Aberdeen City and Shire Supplementary Planning Guidance "Delivering Identified Projects through a Strategic Transport Fund". As the TA points out, the purpose of the guidance is to provide the ability to deal with the cumulative impacts of development on transport infrastructure on a strategic basis. The TA goes on to highlight, "*The projects include road and public transport interventions in a variety of locations where the cumulative impact of new housing and employment uses is likely to cause increased congestion. By sharing the financial burden widely across the region, no one development will be liable for the cost of a specific strategic project or delayed by its implementation. By being upfront about the mechanism for contribution, developers will have greater certainty over strategic transport requirements*". We assume that the STF will be applied to the full development not just the uplift as indicated by Fairhurst in the TA;

- Chapter 4 indicates the previous consent was for 32,381m<sup>2</sup> of office development. Paragraph 4.1.2 states, "Therefore, in order to justify no net detriment the development proposals and subsequent impact analysis will prove that this application does not significantly increase congestion or demand to what was previously agreed or consented". The uplift from the level of development in the previous application to that currently proposed (48,000m<sup>2</sup>) is 15,619m<sup>2</sup>: this constitutes an increase in the development footprint of 48% overall. Notwithstanding that the new application includes for 38,400m<sup>2</sup> office development which equates to an increase in the level of office development by 19% (6,019m<sup>2</sup>), to state that this application will not increase demand to what was previously agreed or consented is unfathomable;
- Paragraph 4.2.2 notes that, "Proposals for signalisation of the existing A90/A956 roundabout junction in the context of the Berryhill committed development are anticipated to provide crossing facilities for pedestrians and cyclists from Aberdeen Energy Park towards residential areas at Denmore, Scotstown, Dubford and Middleton Park". This is a correct statement and inherently recognises the need for enhanced crossing facilities for pedestrians and cyclists accessing the Aberdeen Energy Park;
- Paragraph 4.3.4 states, "The completion of the link from Aberdeen Energy Park through Berryhill to Murcar Roundabout would permit operation of Buchan Link Services via both Berryhill and Aberdeen Energy Park". This can only be delivered through the co-operation and agreement with the Berryhill development. Also, AEP is also benefitting (as will be the service providers) to this link road without having to make a fair contribution to its delivery. Further, paragraph 4.3.7 goes on to highlight how the application site will have excellent public transport connectivity. This is the case as a result of the Berryhill site and their commitment to provide a bus gate link through the two sites, which whilst the TA recognises this, makes no indication of the accessibility of the site without the Berryhill provision coming forward;
- In further respect of the above, the bus link road between Berryhill and the Aberdeen Energy Park is not due to be implemented until the occupation of Phase 3 of the Berryhill development, which is estimated to be 2018. This broadly coincides with the implementation of Phase 3 of the Aberdeen Energy Park Expansion. However, in advance of the bus link being implemented, the build out of Phases 1 and 2 of the Aberdeen Energy Park Expansion will have occurred resulting in approximately 74% of the development being operational. Moreover, this is comprised of 88% of the office development (33,900m<sup>2</sup>) coming online (as well as 15% of the warehouse development (1,394m<sup>2</sup>) for which Fairhurst have not included a trip generation in the TA). Of interest, we can deduce from the proposed trip rates in the TA that this equates to 652 trips in the AM peak (577 in and 75 out) and 527 trips in the PM peak (55 in and 472 out). This is not an insignificant number of trips. The private car will remain the predominant mode, given that there will be limited public transport provision until such time as the link road becomes operational. We would also highlight that it is renowned in transportation planning that once a commuting trip is first made by car, it is very difficult to convert that driver to alternative and, in particular, public transport travel. This further compounds our view of the over-estimation by Fairhurst of the modal share for public transport to the site. Further, since the Fairhurst TA attempts to present an optimistic view of the Aberdeen Energy Park Expansion in trip generation terms as well as in terms of public transport accessibility, we are concerned that this disadvantages our client in a number of ways, principally in that a fair comparison of impacts at the respective sites cannot be derived;
- Section 4.5 Parking Provision covers the requirements for parking provision in accordance with parking levels identified in Aberdeen City Council Supplementary Guidance – Transport and Accessibility. Of very minor note is that, the proposed parking provision is proposed as being 1,480 spaces, albeit the maximum parking level standards would site this provision at 1,472. However, our key concerns are:
  - In accordance with the new application for an extension to the Aberdeen Energy Park, the determination of the required parking provision is based on the level of new development proposed (48,000m<sup>2</sup>). However, later in the TA, the assessment made of the vehicular impact is based **only** on the uplift in development scale of office use from the previously consented, but now expired, application (32,381m<sup>2</sup>). This discrepancy is wholly inappropriate and raises significant concerns about why this approach has been undertaken: we will explore the approach taken to the vehicular impact later in this correspondence;

- The TA bases the determination of parking provision associated with warehousing on the Aberdeen City Council maximum parking standards Warehousing – Wholesale Trading which affords the highest rate available for warehousing. The Warehousing – Storage and Distribution maximum parking standards would equate to 96 parking spaces, as opposed to the proposed 192. It's also worth noting that the Design and Access Statement indicates the car parking provision is based on 1 space per 40m<sup>2</sup> for Industrial land uses, therefore, there needs to be some clarity gained on the type of land use (industrial, storage and distribution or wholesale trading) proposed for the 9,600m<sup>2</sup> of land use associated with the office development;
- We now focus on the approach which Fairhurst has adopted in undertaking the travel demand assessment for the site. Our main concern rests in that a very different approach has been used in the Aberdeen Energy Park Expansion TA compared to the Berryhill TA which is immediately adjacent to the application site and which includes very similar land uses. We would have expected consistency in approach to the TA's across the two neighbouring sites when the transportation consultant has undertaken the work, but more so given the stark similarities in the location and proposed land uses;
- We note that there is no mention of traffic surveys being undertaken to inform an observed level of traffic on the surrounding road network. In a complex road network such as that in the Bridge of Don area and surrounding the proposed development site, where there have been a number of developmental changes over the last few years, we find it highly unusual that no mention is made of any such surveys. As such, no determination can be made on the reliability or validity of the "existing" or indeed "base" traffic flows that have informed their assessment of impacts. Notwithstanding that we would insist that the origin and year of the baseline data that has been used in the assessment be made known, in order to verify that it is fit for purpose, we are also sceptical that no mention has been made of this in the TA;
- The Fairhurst TA has used Scottish Census Results Online (SCROL) data for Travel to Work or Study Daytime Population for Aberdeen City, to determine the People Trip Generation for the proposed office development. The assessment excludes warehousing and, whilst this might be a reasonable approach given that people trips associated with warehousing may be modest in comparison to office use, in the TA which Fairhurst undertook for the immediately neighbouring Berryhill site, trips associated with warehousing were included in the overall assessment. We therefore question the lack of consistency in the approach and suggest that this does not pose a like for like comparison in trip generation terms for the two sites, regardless of the differential in scale;
- SCROL data is based on 2001 census results data which, whilst considered acceptable for the Berryhill TA to both ACC and Transport Scotland given its production in 2008, is now 12 years out of date for the current proposal. On this basis, it would have made further sense to draw on figures used in a consented site;
- In our opinion, the People Trip Generations provided for the proposed office development are completely inappropriate. Focusing on the highlights of Table 5.1.2 the people trip generation indicates a walk share of 20%, a public transport share of 17% and, most notably, a car driver share of 45%. As a comparison, the equivalent people trip generation in the Berryhill TA is: 1.2% walking, 6.9% public transport and 72.5% car driver. The differential in the figures is alarming, not least because of the similarities in the land use characteristics and neighbouring locations of the Aberdeen Energy Park Expansion and Berryhill development, but also, to reiterate, the lack of consistency in applied approach across the two TA's. More so, in that the approach for the Berryhill TA, which was based on census data specific to the AB23 8 post code, was approved by Transport Scotland and ACC;
- Paragraph 5.2.2 makes the statement, "*Previous discussions with Officers at ACC regarding the Berryhill development and the comparison of office trip rates used to determine impact at that consented development and the use of the same rates to determine the impact of these proposals has been dismissed*". This suggests that the approach that Fairhurst themselves adopted in the Berryhill site is, in some capacity flawed and/ or inappropriate. Admittedly, the use of 2001 census data, for example, which would certainly have had more relevance in 2008 than in 2013, has still been used in the Aberdeen Energy Park Expansion TA. Therefore, without evidence of a completely different approach being adopted, or at least, one that betters that which was used



previously, we are struggling to ascertain whether Fairhurst approach was inappropriate for Berryhill or, indeed, if it is inappropriate now. We will seek to understand the reasons as to why *"the use of the same trip rates to determine the impact of these proposals has been dismissed"* by ACC.

- The Aberdeen Energy Park Expansion TA also appears to draw conclusions about the Berryhill trip rates, the origin of which we are unable to confirm. Table 5.2.1 sets out the Vehicle Trip Rate Comparison obtained from: a 2006 travel diary; as observed with an ATC; TRICS rates; and Berryhill, although the figures quoted for the Berryhill site are not evidenced in the Berryhill TA. That is to say, the approach to determining the trip generation for the Berryhill site was based on Stonewood Park which comprises a mix of Class 4, 5 and 6 but for which trips per land use could not be assigned definitively and, therefore, a factor was used to bring the 32% of overall development of office use at Stonewood up to 42% to reflect the proportion of office use at Berryhill. We cannot therefore ascertain where the vehicle trip rate figures used in Table 5.2.1 originate. Furthermore, paragraph 5.2.1 states, *"In addition, TRICS trip rates for the previously approved Berryhill development have been included as a comparison and these rates are also presented in Table 5.2.1"*. To our knowledge, TRICS trip rates for Berryhill were not used in the Berryhill TA and we would question the origin of the figures presented in Table 5.2.1;
- Paragraph 5.2.5 indicates that the previously consented development allowed for 32,381m<sup>2</sup> office development and that, *"this gave an AM two way flow of 584 vehicles an hour and a PM two way flow of 527 vehicles an hour"*. Further, this paragraph then states, *"This assessment is therefore consistent in the level of traffic predicted to that which was previously agreed"*, however, at this stage in the TA there has still been no indication of the trip generation associated with the full development proposals. The reader cannot, at this stage in the report, draw a similar conclusion;
- Table 5.2.2 goes on to indicate the levels of previously consented trips and the now proposed development trips in the AM and PM peaks and paragraph 5.2.6 draws some conclusions on these. Firstly, paragraph 5.2.6 states, *"This comparison indicates a 24% increase in the AM arrivals and a 10% increase in the PM departures"*. Whilst correct, this example is also selective. In fact, there is a 195% increase in the AM departures and a 382% increase in the PM peak arrivals. These appear exaggerated somewhat because of the previously consented lower levels of AM departures and PM arrivals, the point we make is that Fairhurst is selective in their presentation of the actual uplift in trip numbers from the consented level of development to that currently proposed. The standard approach would be to present the overall uplift in the two-way trip generation for the AM peak as 37% and, for the PM peak as 25%, which provides an overall more informed and objective view of the comparative trip generation. We also note at this stage that with a 37% and 25% uplift in the trip generation from the consented development to the expansion currently proposed, then the statement by Fairhurst in paragraph 4.1.2, *"...in order to justify no net detriment the development proposals and subsequent impact analysis will prove that this application does not significantly increase congestion or demand to what was previously agreed or consented"*, does not hold true: there is a clear uplift in the vehicular trip generation and demand on the network;
- We note that Table 5.2.2 is the only place in the TA which gives an indication of the trip generation associated with the currently proposed Aberdeen Energy Park Expansion, but at no point in the TA is clarification provided, or indeed confirmation given as to the approach and figures which have informed their assessment of impacts. In effect, this TA presents a partial indication of the approach taken to inform the junction assessment and, as such, it is difficult to determine whether the assessment has been conducted appropriately;
- Paragraph 5.5.1 indicates that the Parkway East/ Exploration Drive/ Claymore Drive is to be assessed in the TA, however, the overview of modelling results in Table 5.7.2 does not include the results for analysing this junction. This may well be an oversight, but we would insist that ACC ensure the results of this analysis are taken into consideration. Given our understanding of the network in this location and, in particular, the congestion issues associated with the Parkway East/ Exploration Drive/ Claymore Drive roundabout we would suggest that since this will be the main access roundabout in to the development, the level of two-way AM trips (802) and two-way PM trips (661) will exacerbate the operation of this junction. Moreover, this will be compounded by those occasions when events are held at the Aberdeen Exhibition and Conference Centre (AECC), albeit it will be select occasions where event peaks coincide with the development and network peak. That said, it would be prudent to acknowledge that this level of new development and associated new trips to the network, will have an impact on queuing, journey times and general congestion at this location and wider on the network;

- Paragraph 5.6.2 states, "A review of the performance of each individual junction is provided below, with commentary on mitigation measures associated with committed developments which have been included in the modelling process". This is, again, unfathomable. Firstly, our experience tells us that a good practice approach is to take committed development as that which is consented. However, the TA has included the first phase of the Aberdeen Science and Energy Park as committed development which we cannot support. It is our understanding that this current application for a new scale of development and variation to land use, does not have consent. Secondly, we would be keen to understand what "mitigation" measures Fairhurst has included in their assessment of junction impacts associated with committed developments. For example, in the instance of Berryhill, not all mitigation measures have been sufficiently refined to inform the analysis of the proposals. At the very least, the Fairhurst TA should allude to the mitigation measures they have assumed in their junction analysis;
- The only point where we can deduce the level of trip generation which has been assessed in the Fairhurst TA is in Chapter 7 Summary and Conclusions where paragraph 7.5.1 states, "*The report has identified the level of traffic already considered to be committed development from the 2006 AEP approved application. The analysis therefore reflects this and assesses the impact of the predicted increase in traffic associated with the new masterplan of 132 arrival trips in the AM peak and 50 departures in the PM peak*". Whilst we are unable to review the junction modelling outputs to verify our thoughts, we can conclude that the Fairhurst TA has only assessed the uplift in the level of development from the previously consented application to the current level of application. This is inappropriate because i) the previous consent has lapsed and this is now a new application for which the full level of proposed development should be assessed, and ii) it is not correct to assume that the previously consented development constitutes committed development when the consent has expired. Notwithstanding this flawed approach to the analysis, there are inconsistencies throughout the TA in this regard, particularly that the level of parking provision proposed is for the full new masterplan as proposed in the current application, whereas the trip generation and subsequent analysis has focused only on the uplift in development scale (and, even then, has not included trips associated with the Warehousing).

Notwithstanding the detailed critique we have undertaken of the Fairhurst TA above, we would take this opportunity to express our general concern regarding the overall footprint of the development. The approach taken to assessing the level of development traffic associated with the Aberdeen Energy Park Expansion masterplan proposals is inherently flawed in that the TA only assesses the uplift in development from the previously consented application. As a new application and a revised masterplan, in both scale and land use terms, the TA should consider the traffic impact of the full development. As such it is impossible to determine with accuracy the impact that the full Aberdeen Energy Park Expansion will have on the network. Considering the known congestion issues in the Bridge of Don area and, in particular, queuing on the approaches to a number of junctions in the vicinity of the proposed development site, we would expect that a 48,000m<sup>2</sup> development of which office use comprises 38,400m<sup>2</sup> will significantly exacerbate the existing and committed development scenario. The Fairhurst TA states that the junction modelling process concludes that mitigation would be required at Scotstown Road/ Parkway and Balgownie Road/ Parkway. Given the inappropriate and flawed approach to the traffic assessment, we would be inclined to suggest that the proposed level of development will more realistically have a detrimental impact on junctions within closer proximity to the site, such as the Ellon Road/ Parkway/ A956 roundabout, the Ellon Road/ North Donside Road roundabout and potentially others, even with the reduction in through trips as a result of the AWPR. Indeed, this needs further examination with a transparent and consistent approach. In particular, we consider it reasonable to assume that the already congested network in the Bridge of Don area, can only be exacerbated by the Aberdeen Energy park Expansion masterplan proposals.



As such we conclude that the TA undertaken by Fairhurst along with the adopted methodology is inappropriate / flawed and further disadvantages our client, particularly with respect to development viability, sharing the burden of mitigation costs and compliance with Circular 3/2012: Planning Obligations and Good Neighbour Agreements.

Yours faithfully



Chris Bell  
BEng (Hons), CEng, MCIHT, MRTPI, TPP  
Technical Director

P&SD Letters of Representation  
Application Number: 151483  
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Case Officer Initials: SWB  
Date Acknowledged: 11-11-13

## Robert Vickers

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**From:** webmaster@aberdeencity.gov.uk  
**Sent:** 07 November 2013 21:50  
**To:** PI  
**Subject:** Planning Comment for 131483

Comment for Planning Application 131483

Name : simon nixon  
Address : Findlay Farm  
Bridge of Don  
Aberdeen  
AB23 8AX

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : I am writing to object to the planning application 131483 for an Extension to Aberdeen Energy Park to provide 48,000sqm of office/industrial/warehouse floor space.

The development, as well as being deficient in detail is contrary to national and local planning policy. As a neighbour to the proposed development there are several planning matters and material considerations I wish to highlight, namely the impact on residential amenity, access, compatibility with other uses in the area, European protected species, design and layout.

As set out in the Aberdeen City Council Supplementary Guidance for the Murcar Development Framework it is stated that reporters &#8216;...recommended that the ground level of built development should generally be kept below 30m AOD. Development proposals must take account of the need to protect the amenity of any dwelling houses within or adjacent to the framework area and must provide details of mitigation measures, for example through appropriate landscaping, screening, buffer zones and noise mitigation&#8217;

My wife and I strongly believe that suitable measures have not been taken to protect the amenity of our dwelling house which is to be enveloped by the proposal. Specifically, landscaping surrounding our house is minimal with no screening measures, buffer zones or means of noise mitigation proposed.

As set out in Policy B12: Specialist Employment Area of the Aberdeen Local Development Plan I note that the area is identified as being suitable for &#8216;Class 4 Business Use with the exception of proposals at the Aberdeen Science and Energy Park for a mix of Class 4 and Class 5 (General Industrial) which will be considered on their merits&#8217;.

Class 4: Business Use includes:

- a- An office, other than within class 2;
- b- For research and development of products or processes;
- c- For any industrial process being a use which can be carried on in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

With Class 5 defined as: General Industrial Use includes industrial processes other than one falling within Class4.

I would urge you to consider that within the whole proposed site and specifically in the case of the plots surrounding Findlay Farm are not suitable for Class 5 development given the close proximity to residential development.

I would like to object specifically to the layout of these plots for which are &#8216;...located with the office component addressing the road and the industrial unit largely shielded to the rear of the plot. The plots are provided in a variety of sizes and orientations to allow flexibility to meet future market demands&#8217; (Design and Access Statement, Page 9) as there is significant potential for these industrial units to be detrimental to residential amenity due to the nature of the use, in particular the potential for noise and vibrations during nightshift

working patterns which, if fully considered on their merits would prove completely unacceptable and impact significant on the amenity.

For example, noise from the construction of similar units on Claymore Drive (approximately 300m from our property) already has a significant impact to our amenity. Current industrial units on Claymore Drive operate evening and nightshift work which causes significant disturbance. By permitting similar units at a distance of only 5-10m from our property this problem is going to be amplified and no appropriate mitigation measures have been proposed. There is a thin layer of trees proposed on the northern boundary of the site surrounding our property however, this buffer will provide no acoustic barrier during the construction or operational phases. This is contrary to the Supplementary Guidance produced for the site.

The developments closest to our property at Findlay Farm are identified in the Indicative Masterplan as single story Industrial buildings with two story office buildings to the south within plot 6, 7 and 8. Given the variety of buildings within the site, positioning the larger buildings (of plots 6-15) to the south of Findlay Farm will have a greater impact than, for example the smaller plots surrounding the house, particularly as this would likely impact on the nature of processes within the buildings which could be potentially less disturbing. A layout which incorporated smaller, single storey buildings on the plots closest to our property could minimise the negative impact on the privacy of our house and amenity.

Further disturbances are acknowledged in the Landscape and Visual Impact Assessment (October 2013) that Findlay Farm would experience high adverse visual impacts...the effects are substantial (significant) adverse;. Again there are no mitigation measures set out.

As set out in the Scottish Governments PAN 1/2013: Environmental Impact Assessment (Page 7), Where an application for planning permission in principle is used to establish the acceptability of a proposal without having first developed detailed proposals, the requirements of the EIA regulations must still be met in full...In such cases, the level of detail of the proposals must be sufficient to enable a proper assessment of the likely environmental effects, and any resultant mitigation measures; if necessary considering a range of possibilities;. This application is clearly deficient in considering any mitigation measures to the property.

In order for measures to be considered fully in any specific applications I would expect that Aberdeen City Council would ensure that suitable planning conditions would be attached to any planning permission to ensure suitable mitigation measures are required to ensure the significant impacts are mitigated in line with planning and EIA regulations. In relation of the amenity of the property relating to lighting, Policy D2: Design and Amenity of the Aberdeen Local Development Plan states that External lighting shall take into account residential amenity and minimise light spillage into adjoining areas and the sky;. No measures have been identified to take into account our property at Findlay Farm.

As set out in Policy NE6: Flooding and Drainage of the Aberdeen Local Development Plan a Drainage Impact Assessment has not been provided by the developer at this stage. This policy requires that surface water draining associated with development must...avoid flooding and pollution both during and after construction;. There is a water course that runs between the development and the lane which provides access to our property. Ownership is an unresolved issue and is has been blocked and over flowed several times in recent years causing damage to our property. The proposed development has the potential to impact on this drainage issue further and this issue should be investigated and clarified to ensure the developers are accountable for maintenance to ensure it is in accordance with Policy NE6. The water mains to our property runs north south, directly through the proposed development. Again, there have been no assurances that damage would not be caused to our water supply.

The lane between our property and the development is often used by heavy vehicles which impacts on our amenity through disturbance and damage to our property, subsequently it is necessary that suitable plans and agreements are set out with the developers to ensure that no construction vehicles or those relating to future occupiers of the site are contained within the proposed development during construction and operation. Furthermore clarification of ownership and maintenance responsibilities should forthcoming.



As discussed in Section 3.2 of the Design and Access Statement a protected species survey was undertaken and it is stated that "European protected species are not known from the site, and there is very limited potential for bat roosting". However, being familiar with the site I can confirm that there are bats roosting within the water tower and its immediate environs located within the development boundary.

This is contrary to Policy NE8: Natural Heritage of the Aberdeen Local Development Plan which states that "Applicants should submit supporting evidence for any development that may have an adverse effect on a protected species demonstrating both the need for the development and that a full range of possible alternative courses of action has been properly examined and none found to acceptably meet the need identified. Under the Conservation (Nature Habitats, &c.) Regulations 1994 (as amended) it is an offence to disturb these bats. Although it is stated that mitigation measures require "that a survey of trees identified in the Bat Survey Report be undertaken before felling", there is no acknowledgement of the water tower. As set out in Scottish Planning Policy and detailed in Aberdeen City Council Supplementary Planning Guidance: Bats and Development, "planning permission must not be granted for development that would likely have an adverse effect on an EPS unless the Local Planning Authority is satisfied that 3 tests have been met";

Further given recent issue within the city caused by unapproved traveller encampments specifically those which occurred at Claymore Drive and within the Aberdeen Energy Park, Having adversely suffered as a direct result of these temporary encampments, I believe that due consideration should be given to additional and specific security measures to ensure that any returning travellers are not able to camp on the development during the construction and operational use.

To summarise, given the massive impact this will have on the amenity of my property, I feel that these planning issues must be fully considered at the earliest stage by the developer and the Council and that suitable measures are taken if planning permission is to be granted.

# Royal Aberdeen Golf Club

Your Ref – 13148

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8<sup>th</sup> November 2013

Dear Sir/Madam

**Extension to Aberdeen Energy Park to Provide 48,000 square metres of Office/Industrial/Warehouse Floor Space, Land Adjacent to Claymore Drive, Bridge of Don, Aberdeen – Ref 131483**

We write with reference to the above planning application, and to object to the adverse impact which the proposed development would have on the adjoining golf course at Royal Aberdeen. Whilst we understand that the principle of development has been established by the site's allocation in the Aberdeen Local Development Plan 2012, the design details which are included in the proposed masterplan raise serious concerns for the golf club.

The first specific objection which we would wish to raise concerns the 3 storey height of Building 16. A photomontage of this view is included in Figure 8 of the Landscape and Visual Impact Assessment which has been produced by Ironside Farrar. This shows that the scale of the proposed building would tower over the 12<sup>th</sup> fairway, dominating the landscape and spoiling the character of this part of the golf course. The proposed 3 storey height would be incongruous with the existing buildings on the Aberdeen Energy Park, which are generally 1 or 2 storeys. Moreover, all of the other buildings which are proposed as part of this planning application are a combination of 1 and 2 storeys.

The introduction of a 3 storey building into this sensitive landscape would be contrary to the policies contained in the local development plan, and the supplementary guidance contained in the Murcar Development Framework. Policy D6 – Landscape of the local development plan, states that:

*Development will not be acceptable unless it avoids disturbance, loss or damage to important recreation, wildlife or woodland resources...*

It is quite clear that the height of the proposed office building on the eastern boundary of the site would create a significantly adverse landscape impact which would be to the detriment of the recreational enjoyment of the golf course. On this basis the proposal is contrary to the requirements of Policy D6.

Further guidance is also included in the Murcar Development Framework, within which the site area falls. In the relevant sections on Buildings and Built Form (paras. 5.8-5.10) it is stated that:

*all new building is expected to be responsive to context and integrated within a landscape structure and particular regard is required in the areas that lie adjacent to the two golf courses.*

The fact that Building 16 would be much taller than the existing and proposed adjoining buildings indicates that it would not be responsive to its context, thereby causing an adverse landscape effect from the neighbouring golf course. In landscape terms, the proposal is therefore contrary to Policy D6 –Landscape and the Murcar Development Framework.

The second area which we would wish to object to, concerns the lack of any significant landscaping along the eastern boundary adjacent to the golf course. This is also illustrated in Figure 8 of the Landscape and Visual Impact Assessment, which shows an absence of any screening. Examination of the Landscape Masterplan (dwg. No. 100) indicates the planting of very few trees along the eastern boundary, with this area being largely laid out in grass, thereby providing little or no visual barrier between the golf course and the extension to the business park.

This approach differs from that adopted by the existing Science and Technology Park, the proposed development at The Core, and the requirements of the Murcar Development Framework. The landscaping buffer associated with the existing Science and Technology Park is approximately 15 metres in width, and is planted with a dense mixture of trees and shrubs, which provide meaningful screening. Condition 27 of the planning permission for The Core development to the north requires a 20 metres wide landscaping belt to be provided along the eastern boundary, with this being planted with a dense mixture of trees and shrubs. Moreover Figure 3 of the Murcar Development Framework requires a landscaping buffer zone of varying width, but with a minimum width of 20 metres along the eastern boundary of the site. This is required to provide mitigation against the anticipated visual and acoustic effects on the golf course.

The landscaping proposed as part of the current application is wholly inadequate to provide any satisfactory screening whatsoever from the golf course. Should it be approved, it would result in a break in the line of a continuous landscaping belt between the existing Science and Technology Park and The Core development. It would be inconsistent with the requirements of the planning conditions which have been imposed on The Core and would be contrary to the guidance contained in the Murcar Development Brief.

The background to these comments stems from the history of the club and our plans for the future. Royal Aberdeen Golf Club is the sixth oldest in the world, founded in 1780, and has been established in its current location since 1888. Throughout the past 123 years, the course has been subject to modification and improvement, with the aim of establishing a very high quality and traditional links. This has resulted in the course becoming firmly established in the top twenty five in the UK. The culmination of these improvements has allowed the attraction of a series of prestigious tournaments over the years, including the Senior British Open in 2005, the Scottish Boys Championship in 2009, and the premier amateur competition in the world – the Walker Cup 2011. Next year we will host the Scottish Open, which will be one of the highest profile sporting events in the country, enjoying

extensive television coverage globally. As a result of the quality of the course, and its role in hosting major competitions, it has become a popular destination for golfers from all over the world.

Over recent years these events, and particularly the Walker Cup have generated hundreds of thousands of pounds for the north-east economy, and have firmly established the area as a golf tourism destination. The Trump International Golf Links offers significant potential for growth in this sector, and Royal Aberdeen aims to continue to promote both the club and the area to visitors, thereby contributing to the economic buoyancy of the region.

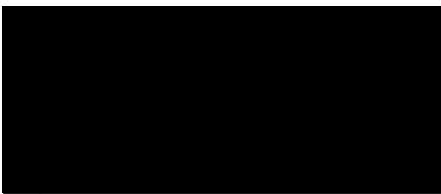
The extension to the business park as currently proposed would cause a detrimental impact on the golf club's ability to attract major events and tourists in the future. This is considered to be an important material consideration in the determination of the application, and when coupled with its obvious breaches of statutory planning policy and supplementary guidance, suggests that it should not be approved in its current form.

We would suggest 2 amendments to allow conformity with the relevant policy requirements. These would involve the relocation of the 3 storey element of the plans to the west, away from the boundary of the course. This would allow the erection of a single storey building on the east-most plot, thereby minimising any adverse landscape impact. The 3 storey building could be erected elsewhere on site.

Secondly, a landscape buffer 20 metres wide, comprising dense tree and shrub planting should be provided along the eastern boundary of the site. These 2 changes would minimise the adverse impacts on the golf course, thereby protecting its amenity, and the ability to attract future tournaments and visitors.

We trust that these comments will be taken into consideration, and we await your written acknowledgement.

Yours faithfully

A large black rectangular redaction box covering the signature area.

R. A. MacAskill  
Secretary



## Robert Vickers

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**From:** webmaster@aberdeencity.gov.uk  
**Sent:** 11 November 2013 13:45  
**To:** PI  
**Subject:** Planning Comment for 131483

Comment for Planning Application 131483

Name : Willaim Alexander Matthew  
Address : Findlay Farm Cottage,  
Ellon Road  
Bridge of Don  
Aberdeen  
AB23 8AX

Telephone : [REDACTED]

Email : [REDACTED]

type :

Comment : Mr W A Matthew

Findlay Farm Cottage  
Ellon Road  
Bridge of Don  
Aberdeen  
AB23 8AX

Tel: [REDACTED]

email [REDACTED]

10th Nov 2013

For the attention of Sally Wood, case officer Dear Sally

Reference: PLANNING APPLICATION:131483

Extension to Aberdeen Energy Park to provide 48,000sqm2 Office/Industrial/Warehouse floor space. Interest and general line of person making representation:

I write in connection with the above planning application and have examined the plans and I know the site well. I wish to object strongly to the development at this location.

Before I go into the plans proposed I would like to state that after reviewing the Aberdeen City and Shire Structure Plan - August 2009 it states the following in relation to pre-requisites to building the Industrial corridor&#8230; &#8226; Aberdeen to Peterhead - this area has important strategic assets and has significant potential. We need to make the best use of the deepwater opportunities at Peterhead Harbour; realise the potential of the Menie Estate golf resort and look into upgrading Peterhead power station. The current work to set out the detail of the Energetica initiative will also have a role to play. The focus needs to be on developing and diversifying the economy, delivering vital infrastructure projects in the first plan period to help create growth. These include building the Aberdeen Western Peripheral Route, duelling of the A90 between Balmedie and Tipperty, improvements to the Haudagain Roundabout and delivering a Third Don Crossing. Until this infrastructure is in place, development in the southern part of the corridor will be limited. This issue will be addressed in the structure plan action programme. We will also need to provide a new secondary school and associated primary school in this area.

My First objection to these plans put forward is I on the basis as that none of these vital infrastructure projects have even started implementation let alone been delivered. Traffic in the immediate area of Bridge of Don as well as Aberdeen in general already suffers serious congestion and the slightest issue in terms of weather or accident puts the entire city at grid lock.

My Second objection is in relation to the mention of improvements to public transport and re-opening of outlying community railway stations to help try end alleviate cars on the road. The public transport system in and around Aberdeen does not appear in my view to have been improved over the years with increased fares and reduced

services and also I believe that there have been NO local railway stations been re-opened in the last 5 years and I fail to see where the funds would come from to implement these vital infrastructure improvements when we hear constantly that councils are in financial predicaments and that local residents everywhere are losing services.

Point Three of my objection relates to the need for this development, who is actually benefiting. We see currently that there is industrial building works in place at the moment in the areas of Westhill, Aberdeen Airport, Kingswells and road infrastructure being put in place for the Berryhill Estate while at the same time we see buildings lying empty in the Altens, Tullos and Kirkhill industrial estates. I would further add to this point that in very recent news reports we hear that Aberdeen will be impacted to the sum of £220 Million as a result of HS2 not coming to Scotland much less up to Aberdeen, another infrastructure improvement which is not being delivered. We have to at some point adhere to the priorities set out by Aberdeen City and Shire Councils and ensure that we have the infrastructure required to ensure that Aberdeen is a viable and attractive place to do business. I do understand the need to ensure that Aberdeen is a viable city to work and we need to protect our next generation of workers to ensure that we have the sort of city that offers opportunities for employment and future investment but we have to make sure that we do that from the outset in ensuring the infrastructure is in place and that we have the demand for investment in the city in the pipeline.

Moving onto the plans themselves;

Point Four of my objection is that there has been an impact assessment carried out on homes in the area of the development and I object on the fact that I have not been considered in any of the assessments yet the development boundary is at the end of my driveway and residents 100's of meters from me have been assessed, I think this gives an unbalanced view of the impact.

Point Five of my objection is that given a visual assessment has been carried out it appears that the plans have set out to give maximum impact to residents especially Findlay Farm and Findlay Farm Cottage where I see that there is opportunity to redesign the development to minimise impact to residents.

Single story office buildings are in the centre of the design and largest in height buildings located at the north boundary. The assumption would be that these buildings are hanger, industrial type building and would operate longer periods of the day and possible night shifts, giving noise pollution as well as visual impacts to Findlay Farm and Findlay Farm Cottage No green space is visible on the plans and would be appropriate in my view to extend green space some green space at the north boundary that would further minimise impact.

Point Six in my objection is that there appears to have been no consideration shown to the wildlife that occupy and surround the area. I have personally seen deer, foxes, squirrels, Herring and birds of prey in and around the area and not to mention bats that are occupying the water tower to the north of the area.

Point Seven relates to the road from the Ellon Road Dual Carriage way to my property and Findlay Farmhouse. Although we do not own the road we have had to spend a considerable amount of time and money having the road repaired due to heavy farm traffic and as a result of flooding this year because the Silverburn burn had not been maintained. I would like assurance that this road will remain private and at no time pre or post construction this road will be used. If it is agreed that this will be used then I expect that it is upgraded and tarred at no expense to myself or my neighbours.

Point Eight related to rainwater drainage, I have already mentioned that the Silverburn which runs at the top of Findlay Farm Road and under it. The maintenance of this burn seriously affected the operation of the burn and as a result overflowed and caused considerable damage to Findlay Farm Road. We also see and a major downpour which is becoming more frequent floods the Ellon Road and the Roundabout at the entrance to the Science and technology park. I would like an assurance that any damage as a result of inadequate maintenance and in efficient drainage will result in repairs being carried out at no cost to the residents of Findlay Farm

Point Nine in objection to the plans relates to the recent announcement in the press that the AECC will be moving from Bridge of Don to the Airport area. Why is there is need for all this development in green field areas impacting the residents, wild life and landscape when there will be a very sizable area become available when the Exhibition Centre moves. I also see that building work has already begun on the East side of the estate which I have to say I have not received any planning notification for or is this already a foregone conclusion?

I hope that my objections to these plans have been outlined clearly and should you wish clarification please feel free to call or email using the details at the top of the page.

I would like to make a formal request to be notified when this planning request will be presented to the approval board, written reply to each of the objection points I have raised with commentary around the outcome and reasons why. I would like to also make a formal request to be present at the meeting.

Yours sincerely,  
Mr W.A.Matthew

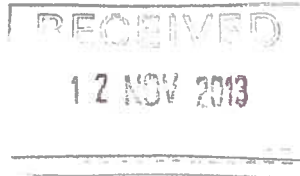


HALLIDAY FRASER MUNRO  
PLANNING

P1936/001/SC/lc

11 November 2013

Head of Planning & Sustainable Development  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
Aberdeen  
AB10 1AB



Dear Sir/Madam

**ABERDEEN ENERGY PARK EXTENSION, BRIDGE OF DON  
APPLICATION REF: P131483 OBJECTION ON BEHALF OF BERRYHILL 1  
LIMITED**

This objection has been lodged on behalf of Berryhill 1 Limited, the owners of the adjacent business park at The Core. In summary, the application for an extension to the Aberdeen Energy Park (AEP) is considered contrary to the Development Plan and should be refused in its current form. The reasons for this view are set out below.

**Development Description**

The planning application form describes the development as an "Extension to Aberdeen Energy Park to provide 48,000m<sup>2</sup> of office/industrial/warehouse floor space". This title describes a general industrial development. It's a catch all description to allow as much flexibility in uses as possible rather than a development related to the purpose and planning policy basis for the AEP.

Reviewing the indicative masterplan confirms this. The indicative layout is effectively a series of office and industrial uses accessed off of a central spine road with structural, but not significant, landscaping around the edges and the access roads. Many of the plots are shown as a mix of office and industrial use where the offices are incidental to the industrial use. In planning use terms these plots are therefore general industrial uses (Class 5). The application, however, in the breakdown of uses on the indicative masterplan, disaggregates the floorspace of these plots to get to the final indicative balance between office use and general industrial use. The reality of the use of these plots is that they will accommodate general industrial uses (Class 5 as defined in the Use Classes Order) rather than Class 4 offices. As a result the balance between the proposed office development and industrial development will be 361,000ft<sup>2</sup> of office space and 158,500ft<sup>2</sup> of general industrial use.

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ARCHITECTS  
CHARTERED PLANNING  
CONSULTANTS  
LAND USE  
CONSULTANTS  
URBAN DESIGNERS  
SPACE PLANNERS

PARTNERS

JOHN HALLIDAY  
DIP ARCH (ABDN)  
ARIBA ARIAS

IAN G FRASER  
B ARCH (HONS)  
RIBA FRIAS

DAVID HALLIDAY  
BSC (HONS)  
PG DIP ARCH (ABDN)

DIRECTOR OF PLANNING  
BOB G REID  
BA(HONS) MCD MRTPI FRI

REGIONAL DIRECTOR  
STEVE CRAWFORD  
BSC (HONS) MRTPI





However the fact that this is a Planning Permission in Principle application alongside the indicative nature of the proposed development would allow for the exact balance of uses to alter over time as future MSC applications are lodged. This could create the potential to move more fully towards a general industrial development on this site. That opportunity to move away from the principles of a research and development (R&D) based business park should be avoided.



### **Development Form and Concept**

The various supporting and design statements lodged with the application indicate that the proposal will fit with the concept of a *"Mature parkland campus"* built up over the years by Scottish Enterprise and the Energetica corridor concept. The overall design concept is described as *"creating a new high quality extension to the Northern boundary of the existing Aberdeen Energy Park"* as an *"inward facing landscaped park"*.

These are worthy concepts for such a prominent and long-standing R&D based business park that serves the energy industry in Aberdeen. A high quality environment is exactly what is expected in this type of development to attract the appropriate types of occupiers. However, in our view the landscape plans, indicative masterplan the general layout does not match that description. The proposed development is located around a single loop road with a public-transport only link to the north. The road is shown as tree-lined but has limited public or private open spaces within it. The only area where more open space is provided that could help create an inward facing landscaped park is the area around plots 1-5 and maybe 9a-c. These are the Class 4 office elements of the development and the problem with the remainder stems from the types of uses being proposed. The remaining layout is that of a standard industrial estate. Plots 6-15 are smaller office/industrial units with the office component addressing the road and the industrial unit largely shielded to the rear. This includes a variety of plot sizes and orientations to "allow flexibility" in order that the development can meet future market demands. This is clearly not an inward facing landscaped park.

This, along with the fact that the application is for Planning Permission in Principle clearly suggests that the development is speculative. Combining the speculative nature of the development, the indicative layout and use types with the built in flexibility will clearly dilute the importance and impact of the AEP and undermine its aims to support energy related R&D uses.

If Aberdeen is to continue to support the energy industry in an increasingly global and competitive market then it needs to protect the specialised R&D opportunity that the AEP offers. Approving the proposed development as it will remove land specifically set aside for this type of use without replacing it elsewhere, resulting in a serious loss of an extremely important resource for the whole of the North East of Scotland.

## Planning Policy

Planning decisions should be made in line with the existing development plan unless material considerations dictate otherwise. In this case the key policy document is the Local Development Plan, adopted only last year. There are no material considerations in this instance that are convincing enough to support this application. The justification for this stance is set out below.



## Aberdeen Local Development Plan 2012

The Aberdeen Energy Park is zoned as Business and Industry (Policy BI2 – Specialist Employment area) and as an opportunity site (OP4). The policy only allows a move away from that specialist nature in exceptional circumstances and in all circumstances the merit of that change must be clear, justifiable and considered. This is a Planning Permission in Principle application and the fact that the proposals are indicative, suggesting an open Class4/5 consent with a mix that could change over time, do not allow the Council to consider the proposals properly and on their merits. If consented as is it could be developed as a general industrial park with some office space – this does not, in our view, comply with the wording of the BI2 policy or the spirit of that policy.

Aberdeen's economy is buoyant and the AEP provides a valuable land resource to support that. The areas of specialist employment were allocated to "... maintain and promote a strong and diverse economy" (para. 3.32 of the LDP). The AEP is also identified in paragraph 3.33 as "...a centre for research and development, product development and technology led oil, gas, energy and renewable energy development". Policy BI2 encourages these uses within the AEP. The proposal is therefore also contrary to the spirit of the policy.

## Murcar Development Framework (Supplementary Guidance, 2012)

This is enshrined with the LDP (Appendix 5 – Existing masterplans to be taken forward in the LDP). As a result it was examined during the preparation of the 2012 LDP and found to be up to date and relevant. The Development Framework clearly states that development on the extension to the Science and Energy Park at Findlay Farm **will be restricted to companies that are significantly engaged in research and development.** The proposed development is contrary to this by offering what is essentially a mixed-general industrial park rather than a R&D focussed campus and is therefore contrary to the LDP on this basis alone.

## Energetica

Energetica is the key economic and development strategy covering a corridor running from the proposed site to Peterhead. The Eco Hub element i.e. the southern area of Energetica is largely centred on the area between Bridge of Don, where the Aberdeen Science Parks are located, and Dyce. The Energetica strategy is a City and Shire-wide development strategy adopted within the policies and allocations of the constituent Development Plans. In respect of the AEP area the Energetica strategy considers that area to be the main business area, **attracting leading-edge science, technology and research businesses that focus on the energy sector.**

The proposed development is more of a mixed-use general industrial and office development that doesn't have this focus and is considered to be contrary to the aims and objectives of Energetica.

Generally, the Aberdeen Science & Technology Park (now the Aberdeen Energy Park) is considered unique in the oil and gas industry worldwide as the only single site facility which can cater for most of the industry's R&D requirements. That was the basis for it being established and the proposed development dilutes that role considerably.



In reviewing the policy elements we are of the view that the proposals conflict with Policy BI2, the Murcar Development Framework and the Energetica Strategy. Although the policy wording allows for a mix of uses, that is only where the merits of such uses can be justified and are exceptional. The planning application does not offer any specific and robust justification for moving away from the presumption to protect R&D uses in this location and we cannot see any exceptional circumstances that justify a policy departure.

Aberdeen is enjoying a positive period of business and industrial development. Construction is under way across the City and in particular at the adjacent Core Business Park. Planning policy should present certainty to allow investors to invest and developers to develop. That certainty will be seriously affected should the Council support the above application. There is already a very good supply of general industrial Class 5 and open Class 4 developments and opportunities locally and across the City without the need to top that up at the expense of R&D specific allocations being lost. There is therefore no market need to approve this application.

### **Transport and Access**

WSP have reviewed the application on behalf of Berryhill 1 Limited and have lodged a separate representation. In that they have identified some clear concerns that are outlined below:

- The Transport Assessment (TA) does not consider the whole development, only the increase from a now lapsed planning consent;
- Public transport access relies in the development of the Berryhill site to the north. The public transport link is therefore some years away increasing the impact of the early development stages of this proposed development;
- Parking standards that have been assumed are incorrect and therefore create more parking on site than perhaps should be the case;
- The TA is inconsistent with the TA methodology adopted for the Berryhill site;
- It's uncertain whether up to date traffic surveys have been carried out, undermining the reliability or validity of the TA;
- The TA uses old SCROL data. More up to date data should have been used.
- Trip generation for the proposed office developments are inappropriate;
- The TA does not allow an accurate determination of the full impact of the AEP expansion; and,

- WSP conclude that the TA, and its adopted methodology, is inappropriate, flawed and disadvantages the already consented development of The Core Business Park at Berryhill.

## **Conclusion**

The information lodged with this application is insufficient in transport assessment terms in order to make a decision at this point and, more fundamentally, there are no justifiable exceptional circumstances that support this application as a departure from the existing Development Plan policies. The current planning application should therefore be refused and a development option specifically related to R&D should be brought forward.

Should the applicant lodge further information we reserve a right to make comment on that where appropriate.

Yours faithfully



**Steve Crawford**  
**Regional Director of Planning**  
**Halliday Fraser Munro**





Head of Planning & Sustainable Development  
Enterprise, Planning and Infrastructure  
Aberdeen City Council  
Business Hub 4  
Ground Floor North  
Marischal College  
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AB10 1AB

11<sup>th</sup> November 2013

Dear Sir/Madam,

**ABERDEEN ENERGY PARK (AEP) EXTENSION, BRIDGE OF DON – APPLICATION REF: P131483**

We object to the above planning application. Aberdeen is already well served for general industrial land and there is no imperative to release other non-industrial land for that purpose. The AEP was established as an R&D centre of excellence to serve the oil and gas, and more recently the wider energy industries. It still has an important role to play and should be protected for R&D activity. Secondly, the significant private investment in other business parks across the City has been secured based on the land allocations in place. Releasing this land unnecessarily will potentially put that and future investment at risk.

We are also of the view that the proposed development runs contrary to the Development Plan. We understand that the site is zoned for Specialist Employment Use (policy BI2) and should only be diverted from R&D use in exceptional circumstances. This is not only a policy in the Local Development Plan but also a key requirement of the Murcar Development Framework and the Energetica strategy. Given the strong supply of general industrial land we can see no valid justification for departing from the policy position. It should be noted that the LDP and the Murcar Development Framework have been adopted as Council policy as recently as 2012. Circumstances have not changed in that short period of time and the policy position should stand for the life of the LDP, or at least until significant changes clearly suggest a diversion from policy. To re-zone the special employment site to general business and industrial land is a major departure from the LDP and MDF, and is not aligned with the Scottish Enterprise ethos to address market failure and provide incubator units for small businesses.

It also concerns us greatly that the Transport Assessment lodged with the application seems to consider only part of the impact of the development, uses historic information, adopts inconsistent and inappropriate assumptions, relies on the Berryhill public transport link to provide decent public transport access and, generally, does not present an accurate picture of the potential impact of traffic from the proposed development. Other developments locally have had to make significant improvements to the surrounding road network and we believe this proposed development will have a significant impact on the wider road network and increase congestion. Furthermore we believe the infrastructure network will be unable to support further open class 4, 5 and 6 development without major upgrade.

Although the description of the development in the supporting documents suggests a high quality landscaped park this is not reflected in the indicative layout. Instead, most of the site can be likened to a general industrial layout accessed off of a central road. R&D type uses are unlikely to be attracted to this type of layout reinforcing the assumption that the R&D nature of the AEP will be lost as a result of this application.

The proposed extension as it stands should therefore be refused in order that the R&D function of the AEP is protected for the wider benefit of the City and Shire economy and to protect the viability of the existing employment consents across the City.

Yours sincerely,

A black rectangular box redacting the signature of Dan Brooks.

Dan Brooks  
Director  
Generate Land Limited