

AECC site, Bridge of Don Development Framework Appendix 1		
1. SNH		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
Welcome the undertaking to include increased water efficiency measures and that this should be included in a Sustainability Statement. Water abstraction is an important issue within Aberdeen.	This comment is noted	No action required as a result of this comment.
Opening up the Silver Burn culvert will allow for the creation of a wildlife and green corridor through the site.	This is seen as a very positive improvement given the existing situation and lack of wildlife potential on the site.	No action required as a result of this comment.
Suggest that other green spaces link to the burn corridor and the existing tree belts around the site.	There are a number of green swathes and tree belts through the site connecting up the green infrastructure.	No action required as a result of this comment.
2. Historic Scotland		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
The Development Framework does not affect any of Historic Scotland's statutory historic environment interests and as such have no comments to make on the document.	This comment is noted.	No action required as a result of this comment.
3. Buccmoor LP (joint venture who control Aberdeen Energy Park and Aberdeen Innovation Park)		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
Timing – Concerned that the Planning Permission in Principle and the Development Framework were out to	Any amendments that are made within the Development Framework that affect the PPIP will	No action required as a result of this

<p>consultation at the same time. The application is considered premature and undermines the validity of process to prepare a Development Framework. Would seek confirmation on how the application will be considered given it has been submitted before the Council have considered their support for the nature of uses proposed in the site and the various development options. The timing of the submission of the application for planning permission in principle confuses and potentially prejudices the consultation process associated with the preparation of the Development Framework, and indeed the ability by the applicant to reflect any feedback on the application proposals from the public, stakeholders and interested parties.</p>	<p>also have to be amended within that process.</p> <p>This submission of the PPIp does not prejudice the consultation process. The Development Framework and comments received will be given full consideration by the Communities, Housing and Infrastructure Committee and a decision made on the document, prior to a decision being made on the PPIp.</p>	<p>comment.</p>
<p>The Planning Statement submitted in support of the proposed development states, at paragraph 4.2.2, that “the Development Framework was approved as Interim Supplementary Guidance by the Communities, Housing & Infrastructure Committee on 19 May 2015.” The public record however states otherwise.</p>	<p>Agreed - the document is currently not Interim Planning Advice (IPA), the May Committee agreed for the document to be circulated for consultation. The report to which this table is appended is recommending that the Development Framework be agreed as IPA. It is proposed that once the Emerging Local Development Plan is adopted the Development Framework would be adopted as Supplementary Guidance.</p>	<p>No action required as a result of this comment.</p>
<p>Support the principle of the development of the site (including the potential for residential development at the exhibition centre (OP13)) but have strong reservations in respect of the inclusion in the site incorporating a household waste recycling centre (HWRC) to replace the facility at Scotstown Road. There is limited</p>	<p>The requirement for this facility is identified in the Proposed Local Development Plan Policy R4 on page 65 and under the sites description on page 80.</p> <p>Further surveys and tests will be required to</p>	<p>Add text to the Framework highlighting that there will be further surveys carried out to determine the</p>

<p>reference to the potential amenity impacts of the facility in the proposed ALDP SEA environmental report. Neither the Framework nor the application seek to qualify the nature of the waste recycling centre. Highlights concern that the proposed use will significantly affect their interests, counter to the policies of the extant and emerging planning policy position.</p>	<p>determine the most appropriate site as well as any necessary mitigation and licensing arrangements required for the facility. The site and exact nature of the Household Waste Recycling Centre is currently unknown but it is essential for the Development Framework to include option(s) for it.</p> <p>Text will be added to the Development Framework to provide further detail on the steps and processes that are required prior to the final decision of the location and provision of the facility.</p>	<p>best site and any mitigation and the license requirements will be met.</p>
<p>The issues relation to regulatory guidance on the preparation of working plans SEPA notes that, in relation to pollution control there are a number of measures to be taken to monitor and/or control. Including insects, noise, vermin, dust etc. This should be addressed via the Development Framework. Whilst statements in this respect would ordinarily be made within any planning application submission, there is no evidence that this is the case in the information submitted in support of the application for planning permission in principle.</p>	<p>Issues in terms of the HWRC will be assessed in consultation with SEPA and any necessary conditions added to the PPIp. It should be noted that the Council would be managing the site which would mean that all of these elements would be within ACC control.</p>	<p>Add text to the landuse options section of the Framework highlighting that there will be further surveys carried out to determine the best site and any mitigation and that license requirements will be met.</p>
<p>Traffic and Transportation - Fairhursts on behalf of Buccmore PL have considered the TA that has been submitted as part of the PPIp in terms of vehicle trip rates,</p>	<p>It is noted that the Transport Assessment, submitted as part of the PPIp application has been considered by Fairhurst on behalf of</p>	<p>No action required as a result of this comment.</p>

<p>Existing use reduction at AECC, A90/ A956 Parkway Roundabout, other assessed junctions and accessibility. The details of this can be found in the representation.</p>	<p>Buccmore PL.</p> <p>Development Frameworks by their nature do not go into detailed Transport issues, they set out a baseline spatial framework including a vision, establishing design and planning principles and agreeing on the development process.</p> <p>The Transport Assessment has been submitted and will be considered as part of the planning application process, this is the most appropriate mechanism to consider this detailed element.</p> <p>The comments relating to the Transport Assessment will be passed onto the case officer for the application and be dealt with through the PPIp process.</p> <p>It is not appropriate or necessary to provide further detail within the Development Framework.</p>	
<p>4. Moorfield Group owners of adjacent Aberdeen Energy Park</p>		
<p><i>Summary of Representations</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>Timing – During the agreed consultation on the Development Framework (6 weeks agreed by the CHI Committee on 19 May 15) a Planning Permission in Principle was submitted (P150824). The application was valid on the 22 May and the period for representations</p>	<p>Any amendments that are made within the Development Framework that affect the PPIp will also have to be amended within that process.</p> <p>This submission of the PPIp does not prejudice</p>	<p>No action required as a result of this comment.</p>

<p>ended on the 24 June at least two months before the Development Framework is reported back to committee. Determination of the PPIp should not be before the Development Framework has been considered by Committee.</p>	<p>the consultation process. The Development Framework and comments received will be given full consideration by the Communities, Housing and Infrastructure Committee and a decision made on the document, prior to a decision being made on the PPIp.</p>	
<p>Recycling Centre – there have been two possible sites identified for the recycling centre within the site one to the north west and one in the north east corner. There is no firm position identified in the Framework or whether a Recycling centre is to actually be provided onsite. Whilst statements in this respect would ordinarily be made within any planning application submission, there is no evidence that this is the case in the information submitted in support of the application for planning permission in principle.</p> <p>My client's position is that they do not wish to see a recycling centre located on the AECC site and consider that if the facility is required for the Bridge of Don Area it would be better to be more centrally located within Bridge of Don to serve the whole community and reduce the need to travel for people using it. If a recycling centre has to be located on the site it would be better located in the North West corner beside the Ellon Road.</p>	<p>The requirement for this facility is identified in the Proposed Local Development Plan Policy R4 on page 65 and under the site description on page 80. Further surveys and tests will be required to determine the most appropriate site as well as any necessary mitigation and licensing arrangements. The site and exact nature of the Household Waste Recycling Centre is currently unknown but it is essential for the Development Framework to include options for it.</p> <p>Text will be added to the Development Framework to provide further detail on the steps and processes that are required prior to the final selection of the location.</p>	<p>Add text to the landuse options section of the Framework highlighting that there will be further surveys carried out to determine the best site and any mitigation and the license requirements will be met.</p>
<p>Concerned about the traffic impact of the scale of development and in particular about the impact of the large number of houses on the local road network, unless a range of mitigation measures are proposed and</p>	<p>See response 3 above.</p>	<p>No action required as a result of this comment.</p>

<p>implemented. It is considered that the submitted Transport Assessment is not suitably robust and potentially underestimates the impact of the proposed development on the local road network.</p>		
<p>5. Scottish Water</p>		
<p><i>Summary of Representations</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>A pre Development Enquiry was submitted to Scottish Water, this confirmed that a water impact assessment is required. Once the final development option has been decided Scottish Water would encourage the developer to submit revised water usage figures. It is important to keep Scottish Water informed of progress to ensure that the appropriate level of infrastructure is delivered.</p>	<p>Noted these comments will be forwarded onto the design team for information.</p>	<p>Forward comments to design team.</p>
<p>6. Scottish Environmental Protection Agency</p>		
<p><i>Summary of Representations</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>
<p>SEPA provided comment to an initial draft document in October 2014 some of the comments were taken onboard however the advice on flood risk, surface water drainage, pollution prevention, waste management, air and regulatory advice has not. Further comment was provided as part of the PPIp application on 26th June 15. All these comments should be read in conjunction. The full comments from 13 October have been added to appendix 2.</p> <p>Comments from the 26th June correspondence:</p>		

<p>The Flood Map does indicate that parts of this site may be at risk of pluvial flooding. As such we would wish to ensure that a pluvial hazard is recognised and considered by the relevant bodies to ensure no adverse impact on the existing built environment. Pluvial flooding issues may be mitigated by quantitative use of SUDS, these might include measures adoptable by Scottish Water and additional measures by the local authority and the developer dealing with SUDS up to the 1 in 200 year standard (plus climate change). The 1 in 200 year design standard is of particular relevance to mitigating overland pluvial flow issues and flood risk.</p>	<p>Include in the text the need to use the 1 in 200 year design standard.</p>	<p>Add text to page 61 para 5.3.1 stating that design standards for the development must use the 1:200 year flood standards.</p>
<p>A Flood Risk Assessment (FRA) to be completed to enable the complete understanding of the flood risk impact on the proposed development. A full drainage assessment would also be required.</p>	<p>Include reference to the requirement of a Flood Risk Assessment and a Full Drainage Assessment.</p>	<p>Add text to page 61 para 5.3.1 to confirm that a flood risk assessment and a full drainage assessment will be required.</p>
<p>A license to carry out engineering works within the water environment would be required from SEPA.</p>	<p>This is noted, these comments would be passed onto the developer for information.</p>	<p>Comments will be forwarded onto the design team.</p>
<p>Development will require a waste management plan as part of any planning submission.</p>	<p>Noted</p>	<p>Add text to section 7 stating a waste management plan will be required.</p>

<p>Park and ride - The finalised plan should require that the proposals do not contribute to the deterioration of air quality. The impact of additional commuter traffic on pollutant and carbon dioxide emissions should be considered. The finalised Plan should support the uptake of lower and ultra low emission vehicles, for instance through requiring that electric vehicle charging infrastructure be part of any future proposal.</p> <p>We would therefore recommend that the following wording or similar is added to the Plan: “Planning permission is separate to environmental licensing and even if planning consent is granted any environmental authorisation will be assessed separately and may not be granted. Early consultation with the regulatory body is therefore recommended for applications that may also require regulatory authorisation to ensure that any significant changes required during the regulatory stage do not necessitate a further planning application and/or neighbour notification or advertising.”</p>	<p>The Development Framework highlights in section 4.4.6 that there is the requirement to complete a comprehensive travel plan as well as considering the option to provide Co-wheels car club vehicles on site. Latent and active electric vehicle charging points will be required in accordance with the Proposed Supplementary Guidance for transport, Air Quality and Noise.</p> <p>These comments are noted. It is not necessary to add these into the Development Framework. These comments will be forwarded onto the design team for actioning.</p>	<p>No action required as a result of this representation.</p> <p>Forward the comments onto the design team for actioning.</p>
<p>We note the reference to the comments from Section 2 of our correspondence of 13 October 2014 in Section 3.1.6. However the Development Framework still references that “SUDS ponds will be integrated into the re-opened watercourses that pass through the site” and as such would reiterate our previous advice.</p>	<p>Agreed the Development Framework should be amended to address the SUDS issues highlighted by Statutory Consultee SEPA.</p> <p>The design team have confirmed that the SUDS ponds will not be integrated into the reopened watercourses.</p>	<p>Amend any relevant plans and paragraphs - 3.1.6, 3.2.2, 5.3.2 and 7.2 to reflect these comments. Amend text to read “In particular the SUDS ponds will not be integrated</p>

<p>CIRIA's C697 manual entitled The SUDS Manual states that "existing natural water bodies should not be used as a means by which to dispose of surface water runoff due to the risk that pollution events and poorer water quality might disturb/damage the natural ecology of the system." As such it would not be acceptable to use the opened up watercourse as a SUDS feature. SUDS must be designed in accordance with the information contained within The SUDS Manual. Appropriate SUDS treatment must be achieved before discharge to the water environment. Creating ponds within the burn for attenuation alone would be an online impoundment which would require a licence from us under the Controlled Activities Regulations (CAR) and would not be licensable if it was for use as SUDS.</p>		<p>into the re-opened watercourses that pass through the site".</p> <p>Comments will be forwarded to the design team for actioning.</p>
<p>In regard to Section 3.2.2 as previously requested further clarification is required on the proposals to open up the culvert of the Silver Burn to enable it to be used as a SUDS feature.</p>	<p>Noted, further clarification should be made on the proposals of the Silver Burn as SUDs features.</p>	<p>Add an additional paragraph to 3.2.2 to explain how this will work.</p>
<p>We welcome the addition of the references, in Section 2.2.6, to the Proposed Plan 2016 also introducing policies requiring water saving technologies and within the District Heating Section to "If at the time of the development of the site district heating is available the developer will be</p>	<p>Comments noted.</p>	<p>No action required as a result of this comment.</p>

expected to explore the use of the system and show why its use is not feasible.”		
7. Royal Aberdeen Golf Club		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
<p>Much of the application covers car parks that are used for major events at Royal Aberdeen. The most recent being the Aberdeen Asset Management Scottish Open 2014. These events generate high visitor numbers and contribute to the economic buoyancy of the region. The longer term benefits which are gained from hosting these events should also be assessed when determining the details of future uses.</p>	<p>It is noted that there would be loss of the existing car parking onsite with the proposed development in the Framework. The Carpark is associated with the AECC, with this relocating offsite there is no longer the requirement for the carpark in this location. It would be unreasonable and not economically viable to retain this site purely as an overflow carpark for events at the Royal Aberdeen Golf Club. It is unfortunate that this overflow provision will no longer be available but the redevelopment of this site is key to the economic buoyancy of the region.</p> <p>The Council entered into a procurement process to select a development partner through a competitive dialogue which required participants to develop a fully-costed and viable detailed development solution for a new venue either on-site or at a new location off-site.</p>	<p>No action required as a result of this comment.</p>
<p>Do not support the location of the recycling centre the northern extremity of the site adjacent to the 14th hole on the Course, concern that this will adversely affect the amenity of this part of the golf course.</p>	<p>Full consideration will be given to the final siting of the HWRC as part of the detailed analysis required for the site. Text will be added to the Framework to confirm what further assessments,</p>	<p>Add text to Land Use options section that states that there will be</p>

	licenses and mitigation measures are required.	further surveys carried out to determine the best site and any mitigation and the license requirements will be met.
Little or no landscaping on the development is shown at the northern end. Consider that a wider strategic landscaping provision should be provided along the eastern edge. A wider buffer for the golf course should be provided in accordance with other developments in the area.	Agreed there will be the requirement for landscaping to all sides of the HWRC not just the western edge. The exact extent and type will be determined via the detailed application process once the necessary assessments have been carried out.	Amend option 3 diagrams on p41 and 45 to indicate substantial landscaping surrounding the entire Recycling Centre.
Internal Consultation		
<i>Summary of Representations</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
The tree belt and the cluster of trees on the eastern edge of the development site should be reintroduced into the Development Framework and relevant plans and text updated accordingly. The area in questions is shown on the plan on page 31 of the document.	Agreed	Update plans and text accordingly.