

**Response ID ANON-X3QE-UMC3-S**

Submitted to **Draft Greenferns Development Framework**  
Submitted on **2017-11-10 11:34:30**

**Introduction**

**1 What is your name?**

**Name:**  
Scottish Natural Heritage

**2 What is your email address?**

**Email:**  
[Redacted]

**3 What is your organisation?**

**Organisation:**  
Scottish Natural Heritage

**4 Please let us know your opinion on the Greenferns Development Framework**

**Comments:**  
Aberdeen LDP - Greenferns Draft Development Framework consultation

SNH strongly supports the production of a strategic spatial framework for this significant expansion area. We agree that a key consideration for this site is the risk of isolation on the fringe of Aberdeen. We therefore welcome the emphasis on the essential strong connectivity with the city, particular green/blue networks that can deliver a wide range of functions including off road active travel routes and habitat links.

Our main comment is that these key ecological and green network requirements are incorporated as 'developer requirements' in the Framework and LDP Action Programme so that developers are clear as to what is expected.

**4) Local context:**

The existing woodland and hedgerow framework and LNCS are significant asset for Greenferns and should greatly contribute to its quality of place and life for residents. We welcome the intent to protect and enhance this, and the provision of open space and appropriate native woodland planting to the south. This will extend this woodland habitat and provide important north/south woodland connectivity along the western edge of the development.

Ancient Woodland Inventory site (pg 22) - we support its enhancement and proposals to connect this site with new areas of native woodland. We recommend the framework includes a reference to the need for a woodland management plan to ensure its interests are protected and enhanced.

We suggest a recommendation for appropriate street trees is included as a general principle for Greenferns. These add multiple benefits such as landscape and biodiversity as well as adding to the quality of place.

**7) Open space and greenways and 8) infrastructure:**

Achieving strategic off road active travel and green networks beyond the site and into the city are key for this site. There will need to be an integrated approach extending beyond the site to link into similar off road routes into Aberdeen to achieve these and we suggest this is emphasised in the framework. We suggest adding explanation as to the specific actions by which joint solutions for green networks will be needed.

Walking and cycling - we suggest the locations where dedicated/off road dedicated cycle paths are expected are clearly identified. We welcome recognition of safe routes to schools (10.4) but suggest specific requirements for off road cycle routes as part of the green network to the school/other key destinations. Consider also hubs for bicycle use.

New landscaping and natural heritage enhancement: much of the ecological benefit will be achieved by ensuring there adequately detailed specifications are supplied along with establishment and long term aftercare arrangements. We suggest the framework also provides the minimum extent of land expected for greenways, new woodland planting etc – for example the widths of some of the greenways. This is important to ensure habitat functionality/connectivity can be achieved.

**9) Drainage:**

River Dee SAC – raise awareness of water abstraction pressures. There should be water and energy efficiency measures to comply with the LDP. Water efficiency in particular is required as part of the HRA for the LDP to limit abstraction from the River Dee SAC.

SUDS (page 73) welcome that ecological solutions to SUDS will be sought and their integration into a green/blue network. There could be greater consideration of the role of all open spaces and the sustainable drainage system to form a blue/green network as an integral part of the design. For example, some streets could contribute to the network by means of swales if these are to be used.

12) Phasing – we welcome the inclusion of areas of open space/SUDS etc. We also suggest advanced phasing of strategic green networks/active travel so this strategic infrastructure is in place at an early stage.

13) Infrastructure delivery/ LDP Action programme

We suggest consideration of our above comments as key developer requirements and that they are added into this Infrastructure delivery section (including those identified in the LDP's SEA Environmental Report) and also in the LDP's Action programme (Greenfems pgs 23-25)

## Laura Robertson

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**From:** David Carmichael [REDACTED]  
**Sent:** 20 November 2017 16:36  
**To:** Laura Robertson  
**Subject:** Greenferns Development Framework - Statutory Consultation.

Dear Laura,

I am writing to you in regard to your email dated 31 October 2017, statutory consultation on the Greenferns Development Framework.

Scottish Water would like to thank you for the opportunity to provide feedback and would make the following comments shown below:

Prior to any development taking place, and to allow us to conduct further assessment of the development's impact on the local network we encourage the Developer to submit a Pre-Development Enquiry (PDE) forms (found at [www.scottishwater.co.uk](http://www.scottishwater.co.uk)). We recommend all planned development relating to more than a single house connection submits a PDE to Scottish Water as early as possible. When the Developer submits the completed PDE form - supplying as much information as they can about the development - this detailed information will allow us to determine if further investigation on the local network is required.

### **OP28 & OP33**

The water and wastewater comments contained in the Aberdeen City Action Programme 2017 are still relevant. A WIA (water impact assessment) is required to confirm capacities, including any temporary or full supply options. This should include confirmation of capacity in the proposed 400mm water main to Grandhome.

A DIA (drainage impact assessment) will be required to identify possible mitigation. Currently Scottish Water is carrying out Strategic modelling for the Aberdeen area. I have included a description of both the WIA/DIA for your information:

### ***Water Assessments and Drainage Assessments***

*Water and drainage assessments help to identify sustainable methods for the following objectives:*

- *Supplying water*
- *Disposing of wastewater*
- *Draining surface water; and*
- *Managing surface water flooding*

*Present the outcomes of these assessments in reports along with any applicable supporting information.*

In addition, all proposed development must be drained by Sustainable Drainage Systems (SUDS) designed in accordance with the CIRIA SUDS Manual (C753) and developers must submit a Drainage Assessment/Drainage Strategy for any development proposals coming forward in line with PAN 61, Policy NE6 of the Local Development Plan and Supplementary Guidance on Drainage Assessments.

Developers should look for opportunities to protect and improve the water environment by taking account of the water features within and close to their sites.

Work carried out by the developer should confirm to the standards as indicated in the Scottish Water publications, 'Water for Scotland 3<sup>rd</sup> Edition' and 'Sewers for Scotland 3<sup>rd</sup> Edition'.

A meeting will shortly be set up with the developer for this site to discuss the strategic water solution. I will forward on more details after the meeting when more information becomes available.

I trust that the above information is acceptable in line with your consultation. Should you require further clarification, please do not hesitate to contact me.

Yours sincerely

David Carmichael

Development Planner  
Development Engagement Team  
Scottish Water  
Kingshill House, Arnhall Business Park, Westhill, Aberdeen, AB32 6UF

**Scottish Water**  
**Trusted to serve Scotland**

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Scottish Water

[www.scottishwater.co.uk](http://www.scottishwater.co.uk)

Our ref: PCS/155608  
Your ref: Aberdeen LDP

If telephoning ask for:  
Alison Wilson

28 November 2017

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

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

Dear Ms Robertson

## **Draft Greenferns Development Framework – Statutory Consultation**

Thank you for your consultation email which SEPA received on 17 October 2017, enclosing a draft copy of the Greenferns Development Framework, dated October 2017.

### **1. Overarching advice**

1.1 We provide the following advice which should be taken into consideration when finalising the Development Framework and preparing subsequent planning applications. If the development comes forward in discrete small stages then it may fall below the threshold we provide site specific advice. Nonetheless the advice below is still relevant and any such proposals should comply with the agreed proposals in regard to these issues for the larger site area.

1.2 **To prevent a potential objection** from us we would expect the finalised Development Framework to detail the requirement for the below key issues to be addressed in any subsequent planning submissions and to be supported by the following assessments and drawings/maps:

- a) Flood risk – Flood Risk Assessment
- b) Drainage – foul drainage to the public sewer and surface water treated by SUDS – Drainage Impact Assessment, map of proposed waste water drainage layout and map of proposed surface water drainage layout
- c) Pollution prevention – Schedule of Mitigation and construction site layout, including mitigation, supporting drawing(s)
- d) Protection of the water environment - A site survey of existing water features, – confirmation of any engineering works with justification and a map of the location of all proposed engineering activities in or impacting on the water environment, including



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- proposed buffers and demonstrating compliance with the flood risk assessment
- e) Existing groundwater abstractions - Confirmation of the location of groundwater abstractions within 250m of all excavations supported by a map demonstrating adequate buffers and, where relevant, assessment of impacts.
  - f) Environmental enhancements – Assessment of potential measures and map showing location of these
  - g) Use of carbon neutral technologies and design measures - feasibility study to assess a heat network and details of sustainable design considerations, map showing proposed heat network infrastructure or areas secured for future use
  - h) Confirmation if the development will be phased and map of proposed phases of development
  - i) Adequate information to enable assessment and comment on the potential consentability of any aspects of the proposal that may require authorisation from SEPA
- 1.3 Some of these requirements are already addressed within the proposed draft wording, for example in regard to flood risk, as advised below. However all the issues should be addressed to prevent an objection from us to the finalised Development Framework.
- 1.4 We **welcome** the Infrastructure delivery table in Section 13 and consider it is a very useful approach to summarise the requirements and how to deliver these. To address our concerns the below issues which are not covered could be added to this table with the requirement for the relevant assessments and drawings.
- 1.5 Our further advice on our requirements and the form in which they must be submitted in regard to the information in the draft Development Framework can be found below.

## 2. Flood risk

- 2.1 We note the requirement in the adopted Local Development Plan (LDP), LDP and draft Development Framework for allocations OP33 and OP28 to be supported by a Flood Risk Assessment (FRA). We consider the wording proposed in the draft Development Framework adequately addresses the requirement for FRA's to be submitted for these allocations, and we support the requirement for "a full FRA will be prepared to be submitted as part of the appropriate statutory planning and legal process" and the detailed proposals for any application for Planning Permission in Principle will take account of the information from the FRA. As such we have **no objection** to the Development Framework wording in regard to the requirement for flood risk to be addressed.
- 2.2 We advise that the flood risk assessment(s) should address all sources of flood risk to the site including fluvial flooding from the Bucks Burn and from smaller watercourses not included on the SEPA Flood Maps. Flood risk from overland flow routes should also be considered as the topography of the area has evidence of historic small watercourse routes through the site. We have records of past flooding at Howes Road from the Bucks Burn, most recently in August 2010. We **would welcome** this requirement being added to the Development Framework wording.

## 3. Foul drainage

- 3.1 We **welcome** the confirmation in the table on page 96 that a "DIA will be required" and "Foul drainage will be required to conform to "Scottish Water's" current design standards". However we **request** that for the avoidance of doubt, and in line with Scottish Planning Policy and guidance, including Planning Advice Note (PAN) 79 Water and Drainage, our

Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements WAT-PS-06-08 and LDP Policy NE6, the following is **added** to the end of the statement “Foul drainage will be required to conform to “Scottish Water’s” current design standards and connect to the public sewer/be adopted by Scottish Water”.

#### **4. Surface water drainage**

- 4.1 We **welcome** the confirmation in the table on page 96 that “All proposed development must be drained by Sustainable Drainage Systems (SUDS) designed in accordance with the CIRIA SUDS Manual (C753) and developers must submit a drainage Assessment/Drainage Strategy for any development proposals”
- 4.2 As per the requirements of the SUDS Manual (C753) SUDS features should provide the four main categories of benefits that can be achieved by SUDS: water quantity, water quality, amenity and biodiversity. A site plan showing the proposed SUDS treatment train must be submitted. The Simple Index Approach calculation (Section 26.7.1 of the guidance) must also be submitted in support of the site plan, and the online tool may be used to assist in this. Where the development has a high pollution hazard level, a detailed risk assessment (Section 26.7.3 of CIRIA C753) must be submitted. In addition we would also refer the applicant to our Planning advice on Sustainable Drainage Systems (SUDS) and specifically paragraphs 4.13 and 4.14 regarding maximising the ecological value of SUDS.
- 4.3 The table on page 96 references that “the opportunity has been taken to enhance the existing watercourses and fully incorporate them within the development layout as part of the network of sustainable urban drainage system (SuDS) and core public spaces.” Please note that Section 23.1 of the CIRIA SUDS manual C753 states that “Existing natural water bodies should not be used as a means by which to dispose of surface water runoff where this would create a risk that pollution events, poorer water quality or alternative flow regimes might disturb/damage the natural morphology and/or ecology of the system. There may, however, be scenarios where existing water bodies would benefit from further inputs of cleaned surface water runoff. Locating SuDS ponds and wetlands close to existing ones can also benefit biodiversity.” We **would welcome** this being clarified in the Development Framework in regard to the reference to using these features as part of the SUDS network.
- 4.4 As per Appendix B, Section B.1.1 *Pre-application* of the SUDS Manual “For larger sites or multi-plot development, where the land is subdivided into separate plots owned by different landowners, or where there is an intention to develop the land in phases, the specification for a drainage master plan should be agreed at this stage. The master plan should be designed to ensure effective communication between all developers and identified stakeholders in establishing the selection, implementation and phasing of source control, site and regional SuDS components. It should also set out the responsibilities for, delivery of and maintenance of temporary site drainage measures required during the construction process.”
- 4.5 Proposed detention basins, ponds, swales and/or filter trenches should be designed to Scottish Water’s standards for adoption as specified in Sewers for Scotland or the SUDS Manual. In such instances, comments should be requested from Scottish Water. In addition Section 7 of the Sewerage (Scotland) Act 1968 allows for the roads authority and Scottish Water to connect to each other’s drainage systems where reasonable to do so. The SUDS for Roads guidance document provides a collaborative framework for a more integrated drainage approach.

- 4.6 Advice from the local authority's roads department and flood prevention unit, and not from SEPA, should be sought on the SUDS strategy in relation to water quantity and flooding.

## 5. Pollution prevention and environmental management

- 5.1 Under Section 4.10 reference is made to "a Construction Environmental Management Plan (CEMP)". One of our key interests in relation to developments is pollution prevention measures during the periods of demolition, construction and any restoration. The applicant, through the planning submission, should systematically identify all aspects of construction site activities during these periods of works that might impact upon the environment, potential pollution risks associated with the construction proposals and identify the principles of preventative measures and mitigation.
- 5.2 As such, the **requirement** for pollution prevention and environmental management to be addressed by the applicant during the construction phase should be detailed in the Development Framework. A schedule of mitigation supported by the site specific maps and plans must be submitted in support of any planning submission. These must include reference to best practice pollution prevention and construction techniques (for example, the maximum area to be stripped of soils at any one time, as the land is previously agricultural use the developer should expect to encounter field drains, and have a system in place to deal with these when discovered, as they could also act as channels for pollution to enter the water environment, a site survey of existing water features and a map showing adequate buffers between these and development) and regulatory requirements. This information will help to assess the environmental impact of the proposals prior to determination. In addition, this information can provide the basis for a more detailed environmental management plan and construction method statements where required, which are likely to be requested as planning conditions. Please refer to Guidance for Pollution Prevention (GPPs) and the recently published Guidance on the construction of SUDS (CIRIA C768).

## 6. Engineering activities in the water environment

- 6.1 In order to meet the objectives of the Water Framework Directive of preventing any deterioration and improving the water environment and to comply with LDP Policy NE6, developments should be designed to avoid engineering activities in the water environment wherever possible. The water environment includes burns, rivers, lochs, wetlands, groundwater and reservoirs. We require it to be demonstrated that every effort has been made to leave the water environment in its natural state. Engineering activities such as culverts, bridges, watercourse diversions, bank modifications or dams should be avoided unless there is no practicable alternative. Paragraph 255 of SPP deters unnecessary culverting. Where a watercourse crossing cannot be avoided, bridging solutions or bottomless or arched culverts which do not affect the bed and banks of the watercourse should be used. Further guidance on the design and implementation of crossings can be found in our Construction of River Crossings Good Practice Guide. Other best practice guidance is also available within the water engineering section of our website.
- 6.2 If any engineering works proposed are likely to result in increased flood risk to people or property then a flood risk assessment should be submitted in support of the planning application and we should be consulted.



6.3 It does not appear any water engineering works are proposed put any planning submission should confirm if this is the case. A site survey of existing water features and a map of the location of all proposed engineering activities in the water environment should be included in any planning submission. A systematic table detailing the justification for the activity and how any adverse impact will be mitigated should also be included. The table should be accompanied by a photograph of each affected water body along with its dimensions. Justification for the location of any proposed activity is a key issue for us to assess at the planning stage. The **requirement** for this should be detailed in the Development Framework.

## 7. Existing groundwater abstractions

7.1 There are several individual properties in the vicinity/adjacent to the boundary of this Development Framework area. In addition on our GIS we can see a well on the south west area and on the northern section of the allocations. Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The planning submission must include:

- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

7.2 Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice on the minimum information we require to be submitted. This **requirement** should be detailed in the Development Framework

## 9. Environmental enhancements

9.1 We welcome the confirmation in the table on page 96 that “Developers should look for opportunities to protect and improve the water environment by taking account of the water features within and close to their sites” and “On site requirements to be delivered by developers”.

9.2 With this in mind we welcome the references to potentially enhancing for example links to the greenbelt, ecological corridors, watercourses, enhancing existing parks and open spaces, connecting path networks and having adequate buffer strips between development and the water environment. We also welcome the references to retaining mature trees where possible and increasing the amount of woodland along the Bucksburn corridor within the Bucks Burn Park. Newly planted trees in this area should be native and of local provenance to enhance the existing native woodland.

9.3 We would support the investigation of on-site environmental enhancements, for example deculverting / ‘daylighting’ watercourses, removal of hard bank reinforcement on Bucks Burn and /or re-meander a reach of the Bucks Burn adjacent to the development. Should it be necessary to install surface water headwall/s some of these works, in particular the

removal of hard bank reinforcement, could be explored in tandem. We would be fully supportive of any investigations which would seek to compensate for any historical or proposed impacts to the site, and add environmental improvements or enhancements where appropriate.

- 9.4 As such we **request** that the following is added to the end of the statement “On site requirements to be delivered by developers and any other environmental enhancement measures to be investigated and where viable delivered through any subsequent planning application(s)”.

## 10. Use of carbon neutral technologies and design measures

- 10.1 We welcome the reference to achieving sustainable design. Scottish Planning Policy 2014 outlines the key Scottish Government planning policy principles relating to delivering renewable heat and electricity. In particular paragraph 154 states that:

“The planning system should:

- Support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:
  - 30% of overall energy demand from renewable sources by 2020;
  - 11% of heat demand from renewable sources by 2020; and
  - The equivalent of 100% of electricity demand from renewable sources by 2020.
- Support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks;”

- 10.2 Additional policy support is provided by SPP (Paragraph 159) requiring that “Local Development Plans should support the development of heat networks in as many locations as possible, even where they are initially reliant on carbon-based fuels if there is potential to convert them to run on renewable or low carbon sources of heat in the future”.
- 10.3 The Scottish Government’s support for low-carbon and renewable sourced heat is further established in the Scottish Government’s Heat Policy Statement: Towards Decarbonising Heat (June 2015). This sets an overall target of 1.5TWh of heat to be delivered by district heating by 2020 to both domestic and non-domestic properties. This approach is sought to ensure that renewable heat makes a significant contribution to meeting Scotland’s climate change targets and support the delivery of our renewable heat target.
- 10.4 In order to deliver the Scottish Government’s targets for 40,000 homes to be heated through heat networks, new developments need to be designed to incorporate district heating. Where substantial new developments are planned, the opportunity arises for providing a heat network within the site and for this to be required and designed in at the earliest stages. New developments have a role to play in not only establishing and creating these networks, but also in connecting to networks to make use of heat that is being captured.
- 10.5 Online Scottish Government “Planning and Heat” guidance (2015) advises developers to submit an energy statement as part of their planning application which “may be informed by heat map information and include an assessment of whether an individual property or district heating solution is technically feasible and financially viable. The statement should identify any available sources of heat or other factors such as where land should be safeguarded for future district heating infrastructure.”

- 10.6 It is important to consider these issues which could affect layout, infrastructure, relationship with other developments, and energy use. New developments in areas where heat can be provided, either through existing heat networks or from planned proposed heat suppliers, should be designed to enable or facilitate connection to district heating networks. The design of new developments should incorporate space that can be safeguarded to enable pipework to be laid and/or connection to district heating networks to be made in the future if district heating is not an integral part of the original design without causing disturbance to buildings or infrastructure. This applies to all new development.
- 10.7 In light of the above, and in support of LDP Policy R7, consideration should be given to the provision of a district heating network to meet the heat demand for the proposed development, consistent with the advice provided in the Scottish Government's online Planning and Heat advice, as quoted above. This should include the submission of the following information in support of any planning submission:
- a feasibility study which assesses the technical feasibility and financial viability of heat network/district heating for this site, identifying any available sources of heat (either within the site or offsite) and other factors such as where land will be safeguarded for future district heating infrastructure.
  - Demonstration within the Design and Access statement (or other supporting statement) and detailed layout plans on how the findings of the feasibility study have been incorporated into the design and layout of the proposal.
- 10.8 The Development Framework should clearly detail the **requirement** for a feasibility study to assess the heat network and details of sustainable design considerations as part of any planning submission.

## **Regulatory advice for the applicant**

### **11. Regulatory requirements**

- 11.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 11.2 In addition a CAR Licence is likely to be required for the discharge from site SUDS given the scale of the development (the current threshold is a development with greater than 1000 houses).
- 11.3 Management of surplus peat or soils, or importation of material for example landscaping, may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012.
- 11.4 The applicant should consider if other environmental licences may be required for any installations or processes, for example with regards to onsite heat generation.
- 11.5 The site boundary covers approximately 73.6 ha (less the 7.6 ha owned by Enermech). As such a Construction Site Licence may be required as this exceeds the 4 ha construction site area threshold. These apply to sites of 4ha or more in area, sites 5 km or more in

length or sites which contain more than 1ha of ground on a slope of 25 degrees or more or which cross over 500m of ground on a slope of 25 degrees or more. It is recommended that you have pre-application discussions with a member of the regulatory team in your local SEPA office.

- 11.6 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in your local SEPA office at: Inverdee House, Baxter Street, Torry, Aberdeen, AB11 9QA, Tel: 01224 266600.

If you have any queries relating to this letter, please contact me by telephone on 01224 266656 or email at [planning.aberdeen@sepa.org.uk](mailto:planning.aberdeen@sepa.org.uk).

Yours sincerely

Alison Wilson  
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 this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar 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 or similar 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. For planning applications, 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 on our [website planning pages](#).*

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Our Ref: KC/N14/5

26<sup>th</sup> October 2017

Dear Sir / Madam

### **Greenferns Development Framework**

Thank you for the opportunity to comment on the draft updated Greenferns Development Framework. Nestrans is supportive of the changes that have been made to the document since its last publication and more generally of the principles outlined in the document relating to the integration of public transport, cycling and walking links within and through development.

We would however like to highlight the need to fully consider the potential likelihood for and impact of additional traffic, particularly traffic from the AWPR and other surrounding parts of the city and how this can be discouraged from using the roads within the development as a through route to access other parts of the city and the impact that any additional traffic may have on the existing residential areas of Bucksburn, Northfield and Sheddocksley.

Nestrans would be happy to discuss these comments in more detail if required.

Yours faithfully,

Kirsty Chalmers  
Transport Executive (Strategy & Delivery)

