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Dear Local Development Plan Team

Aberdeen Local Development Plan – Proposed Plan

Thank you for giving Scottish Water the opportunity to comment on the Proposed Aberdeen City Local Development Plan. We welcome and fully support the council's commitment to working with us, and other Key Agencies in Scotland, to help create a plan that delivers a vibrant and sustainable city region.

Scottish Water has participated in workshops, responded to previous consultations and maintained close contact across all levels within the Council with the aim of delivering strategic infrastructure to support development. By engaging with Aberdeen City Council and providing feedback throughout the Plan's formation we now have only a few minor comments to make.

The notes provided below are intended to help clarify Scottish Water's role in meeting the demands of new developments and protecting both the water environment and water resources in a responsible and sustainable way. We hope that you will consider amending the Proposed Local Development Plan and associated documents to reflect the information provided, where necessary:-

Policy I1 Infrastructure Delivery and Planning Obligations –

This policy clearly directs developers to the Local Development Plan Action Programme to find out about the infrastructure requirements of allocated sites. Scottish Water is pleased to see that developers are encouraged to approach the appropriate provider to agree the precise level of infrastructure servicing; however, there could be more of an emphasis on the benefits of early engagement. The earlier discussions can take place regarding a development, the easier it is to work together to mitigate against any potential issues, without affecting the developer's build programme.

Our Development Impact Assessment process has now been superseded by Pre-Development Enquiry (PDE) forms (found at www.scottishwater.co.uk).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. In response we will provide an assessment of available capacity at the WTW and WWTW in question, as well as indicating whether further investigations will be required. Having this information upfront can prevent delays further down the line.

Much like electricity and telecoms infrastructure, developers are responsible for providing the water and wastewater infrastructure needed to support their site rather than making a financial contribution through Developer Obligations. In return, developers may be eligible for a Cost Contribution¹ from Scottish Water. Whilst the distinction between directly providing the infrastructure and making a financial contribution towards it is clearly made in the Planning Obligations Supplementary Guidance, on page 33 of the Proposed Plan water and drainage is included in the list of possible areas requiring a financial contribution. Additional clarification may be necessary.

Flooding, Drainage and Water Quality, page 57 –

Sewers for Scotland 3rd Edition has now been released and supersedes the 2nd edition as the design and construction guide for developers in Scotland. Both Water for Scotland 3rd Edition and Sewers for Scotland 3rd Edition can be accessed through our website, www.scottishwater.co.uk. Policy NE6 is clear and well written and we have nothing further to add.

Low and Zero Carbon Buildings and Water Efficiency, page 66 –

The projected growth in Aberdeen City will have a direct impact on water infrastructure and the amount of water abstracted from the River Dee. Scottish Water fully supports Aberdeen City Council's commitment to reducing these pressures through the implementation of *Policy R7 Low and Zero Carbon Buildings and Water Efficiency and Resources for New Developments Supplementary Guidance*. From source to tap and then sink to sea, the production of drinking water, its daily consumption and its eventual safe return to the environment requires a substantial amount of energy. Therefore, the efficient use of water can have a positive impact on the water environment, as well as providing opportunities to reduce the amount of energy consumed and carbon produced as part of this water cycle. Scottish Water is always open to discussing innovative or strategic solutions to providing water and wastewater services.

Appendix 3 - Infrastructure Requirements for Masterplan Zones –

A summary is provided of infrastructure requirements for Masterplan Zones. It is worth noting that Scottish Water is exploring opportunities to deliver a more holistic approach to providing strategic wastewater infrastructure as well as water infrastructure, to meet the cumulative demands of development.

¹ Provision of Water and Sewerage Services (Cost Contribution) (Scotland) Directions 2015

Appendix 4 - Masterplans –

Scottish Water supports the use of the Masterplanning process to aid the delivery of large or complex sites. As a Key Agency, Scottish Water is always keen to be involved in future planning consultations, including Supplementary Guidance, Development Frameworks, Development Briefs and Masterplans. This is especially true of large, important developments such as the new Aberdeen Exhibition and Conference Centre, Aberdeen Harbour or Grandhome. By being given the opportunity to provide early input on water and wastewater infrastructure requirements we can help set expectations for developers. This will also help to foster an integrated approach to addressing the cumulative impact of development.

Flooding, Drainage and Water Quality Supplementary Guidance –

Scottish Water is pleased to see that previous comments to clarify statutory responsibilities and roles in this area have been taken into account. Page 38 refers to Sewers for Scotland 2nd Edition, which has now been superseded by Sewers for Scotland 3rd Edition. Both Water for Scotland 3rd Edition and Sewers for Scotland 3rd Edition can be accessed through our website, www.scottishwater.co.uk.

In relation to SUDS, work to confirm the technical specification requirements for swales and filter trenches is on-going. These will take the form of additional clauses to be added into Sewers for Scotland 3rd Edition. We understand that one of the biggest challenges is to ensure SUDS are appropriately maintained before Scottish Water is in a position to vest. We have begun to implement “early vesting” of new assets, which will result in Scottish Water vesting SUDS as soon as they are operational rather than when the development has been completed. This will give the developers confidence that their asset will be vested and will give our customer comfort that they are appropriately maintained and operated.

Wind Turbine Development Supplementary Guidance –

Scottish Water is required to ensure that the proposed activity does not impact on the ability of Scottish Water to meet its regulatory requirements. Under Article 7 of the Water Framework Directive, waters used for the abstraction of drinking water are designated as Drinking Water Protected Areas (DWPA). The objective is to ensure that any activity does not result in deterioration of waters within the DWPA.

We would request that any proposals or applications for wind farms or fuel storage are submitted to Scottish Water for review, to identify whether there are DWPAs present which would require protection through mitigation actions. Wind farms can have other potential impacts on our operations. For example, our below ground assets such as water and sewer mains can be affected by heavy construction traffic and may require protection. Some of our radio telemetry signals can be interfered with by wind turbine blades, depending on the location of the turbines.

We would request that the document advises all proposals and applications be sent to Scottish Water for review so that we can assess for any impact on the following:-

- Drinking water quality and quantity

- Below-ground assets
- Radio telemetry interference

This allows Scottish Water to assess any potential impact on our operations and suggest adequate control measures if required.

Action Programme –

Scottish Water recently provided comments for the development sites identified in the Action Programme and the majority of these do not require any changes. A few observations and additional comments are provided below:-

OP8 East Woodcroft North – This development is small and will have no real impact on the water or wastewater infrastructure in the area.

OP9 Grandhome and OP31 Maidencraig (although OP31 is referred to under OP43, the old reference number) - There is a comment for both of these sites under “Water” which states, “A separate application should be submitted to Scottish Water for connection to infrastructure after full planning permission has been granted.” The developer does not need to wait until they have received full planning permission to submit an application to connect. We would actively encourage developers to submit a Pre Development Enquiry form, which can be found at www.scottishwater.co.uk, and engage with us as soon as possible.

OP18 Craibstone North & Walton Farm and OP20 Craibstone South – Scottish Water’s comment for water and wastewater infrastructure is the same for these two sites. OP18 and OP20 have been combined in the Action Programme but a separate comment has also been duplicated for OP18 and this could perhaps be removed. Scottish Water’s Development Impact Assessment has now been superseded by our Pre Development Enquiry form, details above. The developer will be notified if a Water Impact Assessment or Drainage Impact Assessment is required for their site in our response to the enquiry.

OP21 Rowett South – The water and wastewater comments for this site appear to be under a duplicate entry of OP20. As the site is still named Rowett South it is most likely the reference number just needs to be updated.

OP41 Friarsfield – The developer has completed a Water Impact Assessment for this site.

OP59 Loirston - The developer has completed a Water Impact Assessment for this site.

OP59 Prime Four Extension – A Water Impact Assessment and Drainage Impact Assessment will be required for this site.

OP108 Mid Anguston – This site may require a flow and pressure test as it is situated at the end of the network. Internal water storage would also be recommended within each property. There is a small septic tank here but there is currently zero capacity. Should the

development wish to connect, Scottish Water will initiate a growth project once our 5 Growth Criteria are met.

OP109 Woodend Peterculter – Each property will require internal water storage. There is no sewer infrastructure in the vicinity, so a sewer mains extension will be required to connect to the public system.

We trust that these comments are helpful and will add value to your document. Should you require any support reviewing amendments made based on the information we have provided we would be happy to help.

In the meantime, should you require any further clarification or assistance, please feel free to contact us.

Yours faithfully

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Susanne Stevenson
Development Planner – Scottish Water