

Our ref: PCS/140972  
Your ref: JS/--/82678/  
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Jason Stark  
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If telephoning ask for:  
Alison Wilson

2 July 2015

By email only to: [aberdeen@fairhurst.co.uk](mailto:aberdeen@fairhurst.co.uk)

Dear Mr Stark

**Town and Country Planning (Scotland) Acts**  
**Planning application: APP/2015/1107**  
**Proposed residential development (erection of 66 dwellinghouses)**  
**Land East of Greystone Road, Kemnay**

Thank you for your letter of 17 June 2015, which SEPA received on 18 June 2015, in follow up to our correspondence of 11 June 2015 (our reference PCS/140588) to Aberdeenshire Council. Unfortunately the submitted information does not address all the issues raised in our previous correspondence and therefore we maintain our objection to this planning application unless **modifications** are made to the proposal to address the issues detailed below.

**Advice for the applicant and planning authority**

**1. Surface water drainage**

- 1.1 In our previous response we requested the surface water drainage proposals were modified to ensure all surface water run-off on site is treated by an appropriate level of SUDS treatment types.
- 1.2 The filter trenches in plots 64 to 66 are a welcome addition and provide the required second level of SUDS treatment for these properties.
- 1.3 Previously the information provided showed plots 1 and 2 discharging surface water with no SUDS treatment. Drawing 82678/2002 Rev A shows these to plots being treated by individual filter trenches providing one level of SUDS treatment. For a development of this size two levels of SUDS treatment are required for all parking areas and therefore the run-off from the parking areas of Plots 1 and 2 is still not in accordance with best practice. We therefore continue to **object** to this planning application unless **modifications** are made to the SUDS features to address this issue, ensuring all surface water run-off on site is treated by an appropriate level of SUDS treatment types. The one level of SUDS treatment provided for these plots is adequate for the roof water run-off.



Chairman  
David Sigsworth

Chief Executive  
Terry A'Hearn

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- 1.4 As per Section 3.3 of our previous response best practice requires the first level of SUDS treatment to take the form of source control. We would therefore expect in general for development of this scale the first level of treatment to be source control and encourage a second level to consist of a detention basin and/or pond designed to an adoptable standard. Justification should be provided for the basin being the first level of SUDS treatment in this instance, rather than second, and for the lack of source control.
- 1.5 We would also the request, as per Section 3.2 of our previous response, that appropriately dimensioned drawings of the SUDS elements, showing plan and cross sections, be provided by the applicant.
- 1.6 As referenced in our previous response, no information has been provided on potential maintenance/adoption of the SUDS elements, the current layout/design may not meet adoptable standards. Sewers for Scotland stipulates there should be "access with a minimum width of 3.5m around the basin suitable for maintenance vehicles." The current plan does not show this. Comments should be sought from Scottish Water and the Local Authority Roads Department where the SUDS proposals would be adopted by them to ensure they are designed to an adoptable standard. We encourage the design of SUDS to Sewers for Scotland Second Edition standards and the adoption of SUDS features by Scottish Water as we are of the view that this leads to best standards and maintenance.

## **Regulatory advice for the applicant**

### **2. Regulatory requirements**

- 2.1 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 operations 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 e-mail at [planning.aberdeen@sepa.org.uk](mailto:planning.aberdeen@sepa.org.uk).

Yours sincerely

Alison Wilson  
Senior Planning Officer  
Planning Service

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#### *Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. If you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found in [How and when to consult SEPA](#), and on flood risk specifically in the [SEPA-Planning Authority Protocol](#).*