

MEMO



ABERDEEN
CITY COUNCIL

To	Planning & Infrastructure	Date	26/06/2017
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		Our Ref.	
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Planning Application No DPP170021.

This response takes cognisance of the additional information submitted since our response to the Transport Assessment (TA) was provided. The additional information includes the Fairhurst letters dated 24/04/17 and 06/06/17, and the Transport Assessment Addendum (TAA) report dated 02/05/17.

1 Development Proposal & Planning Context

- 1.1 I note that the application is for proposed community and sports facilities, football academy (comprising outdoor pitches, pavilion, ancillary buildings), 20,000 capacity stadium, ancillary uses, formation of access roads, parking and associated landscaping and engineering works.
- 1.2 We would note that the TAA provides a lot more detail than the original TA in terms of outlining and explaining access and transportation considerations relative to the proposed development site. It also addresses a number of points previously raised by ACC Roads, which are acknowledged in this response, where relevant. However, it is our view that there remains a number of outstanding issues previously highlighted that have not yet been appropriately addressed by the applicant.
- 1.3 In addition, the applicant has revised a series of fundamental aspects previously presented in the TA including the trip generation, modal split and trip profiles of the proposed development. As this constitutes new information and varies from scoping correspondence provided prior to the TA being submitted, we reserve the right to request for further clarity and information on the methodology applied. It should be noted that the altered methodology has not been scoped with the Council and agreement has not been sought as would normally be expected.
- 1.4 It is also noted that since comments were provided in relation to the original TA, the development content and site layout have undergone alterations. It is understood that the only alteration of relevance to ACC Roads is the on-site car parking provision which has now been reduced from 1,600 spaces to 1,350

spaces. These latest comments take cognisance of this revision to the development proposal.

- 1.5 The applicant has since provided comments received in relation to the public consultation process. It is evident from this that comments received have been considered when revising the proposals, which is considered to be acceptable.
- 1.6 Section 4.3.12 of the TAA identifies that during events “Police Scotland can control the movement of vehicles, pedestrians and cyclists as required as part of the Traffic Management Plan.” **It should be confirmed in writing from Police Scotland that they are willing to undertake this general responsibility – otherwise, alternative strategies/mitigations are required.**

2 Trip Generation & Modal Split

- 2.1 It is noted that the applicant has engaged the Aberdeen and Grampian Chamber of Commerce (AGCC) to undertake a new survey of supporters who currently attend matches at Pittodrie Stadium. The organisation carrying out this survey is to be welcomed in principle as a more impartial and objective way to better understand existing travel behaviour to and from the existing stadium than the DST survey results previously provided.
- 2.2 Despite this, we would note that the survey focuses exclusively on existing travel behaviour to Pittodrie Stadium. We would take the view that results from this survey would not necessarily reflect travel behaviour at the proposed stadium considering the differing locational characteristics and differing level of accessibility of the proposed development. It is our view that these differences would result in changes in travel behaviour and mode choice between the surveyed site at Pittodrie and the proposals at Kingsford and that therefore the survey cannot be taken as wholly representative of travel to the proposed development. As well as those asked, speculative questions should have also been asked about planned travel to the proposed stadium.
- 2.3 The original TA included the park and ride use as part of the public transport mode share given that all users were projected to utilise onward shuttle buses from these locations. Following discussions with ACC it was agreed that, as travelling by car represents the primary part of the overall journey, the park and ride element of the public transport mode would be added onto the existing car driver mode share. This is acknowledged in Table 3-3 of the TAA which identifies a 64.25% car mode share which has been added on to the 48% originally shown.
- 2.4 Any of those using the park and ride sites at present to travel to Pittodrie Stadium will likely have been captured in a combination of the public transport mode share, special match day bus or other option in the AGCC supporter survey. **Using the 62% mode share to represent car drivers, aside from its inapplicability raised in paragraph 2.2, and given it represents a reduction in comparison to the TA, is therefore inappropriate and could underestimate vehicle movements in the area associated with the proposed development.**
- 2.5 It is noted that the applicant acknowledges in the TAA that a small proportion of away supporters are predicted to travel by modes other than by supporters’ bus. The modal splits presented in Table 3-4 are considered to be broadly realistic and are therefore acceptable.

- 2.6 The applicant has identified in their response letter that the 'everyday use' trip generation is identified in the scoping note in Appendix A of the Transport Assessment, and no further detail has been provided in the TAA. This suggests that there would be 14 trips in the morning peak hour and 116 trips in the evening peak hour to the proposed development. This takes account of general staff, youth academy and SFA performance kids. **We would query whether other land uses proposed such as the community facilities, leisure, ticket office, club shop, museum or hospitality suites would have any trip generation associated with them in the respective peak hours on an 'everyday' basis.**
- 2.7 **In addition to this, and subject to the resolution of the point raised in Paragraph 2.6, we would re-iterate the request raised by the Council through scoping, and again in response to the TA, that we require an assessment of these trips to be undertaken in order to identify the detailed multi-modal breakdown, and to assess how the site would be accessed during these non-match times. It is acknowledged that a modal split of 70% has been applied for car use, however, no justification has been provided for this. In line with ACC and national transport policy, proposed developments have a requirement to demonstrate that they would be accessible by sustainable transport modes.**

3 Departure and Arrival Profiles

- 3.1 The original TA already identified that the proposed development would be equipped with a 'fan zone' with the intention to encourage supporters to spend more time at the stadium before and after a match. We are generally in agreement with the principle that widespread use of these facilities would likely encourage some supporters to spend a small amount of additional time at the stadium before a match.
- 3.2 It is noted that the departure and arrival profiles have now been amended since the original TA to spread the transportation impact of the development over a much longer 3 hour period before a match and to a lesser extent after a match. This represents a significant change to the methodology applied within the original TA modelling. For example, on and off site parking arrivals were projected to begin at 13:45 for a non-old firm domestic match on a Saturday afternoon in the TA. The TAA now predicts approximately 40% of supporters would have already parked their car by 13:45 for this type of match.
- 3.3 Given the 'fan zone' was already being proposed when the TA was produced, the change to trip profiles appears to be based on the results of the AGCC survey. We take the view that the evidence this relies upon is fallible. It also seems unlikely that large numbers of visitors would arrive substantially in advance of a weekday evening event due to work and education commitments. The AGCC survey asks specifically when supporters arrive in Aberdeen and not when they arrive at Pittodrie Stadium. Notwithstanding the point raised in Paragraph 2.2, the results of this question are considered to be inappropriate to be used as a basis to identify when supporters would arrive at the proposed stadium for a match.
- 3.4 **We would therefore request further evidence to be provided which justifies the arrival profiles identified, why they are considered to be appropriate, and why this has been altered from the TA.**

4 Walking

- 4.1 The number of trips assumed to be walking from the site has increased from 2.5% to 3.0% following the comments previously provided regarding stadiums having a larger walking catchment than local facilities; which is to be welcomed. This has included 2.5% walking from Westhill / Elrick and 0.4% walking from Kingswells, equating to 351 trips from Westhill / Elrick and 62 from Kingswells for an average home support and 585 and 88 trips for a European match.
- 4.2 This is justified on the basis of those living in Kingswells having a 27% modal preference for walking and those living in Westhill / Elrick having a 66% modal preference for walking. This is on the basis that most of Kingswells is located further away and residents would be less willing to walk than those living in Westhill / Elrick. We would broadly agree with this principle.
- 4.3 Comments previously provided to the applicant highlighted a number of other locations to the east of the site which could generate potential walking trips. This includes from Prime Four (particularly for midweek matches after work). The isochrones provided in Appendix C also suggest that the committed residential development at Countesswells would also be located within 3-4km proximity of the site. **We would request clarification whether any walking trips are being attributed to these other areas located in proximity to Kingswells.**
- 4.4 We would also note that no detail has been provided within the TAA regarding the suitability of the walking route on the A944 from the east towards the site. **As previously highlighted, and as a standard requirement of a TA, there is a requirement to assess the merits of this route, taking into account specifics such as what pedestrian provision would be in place at the AWPR grade separated junction to allow pedestrians to cross safely.**
- 4.5 The applicant has since clarified in their response letter that the eastern shuttle bus access road to the site would not be equipped with pedestrian facilities. Now that the TAA acknowledges that there would be pedestrians travelling to the site from the east, **we would request that a footway is provided along this access road to aid pedestrian safety and to adequately service the pedestrian desire line.**
- 4.6 It is noted that a pedestrian guard rail would be installed on both sides of the A944 to the west of the proposed site. A 10m section would be removable to allow pedestrians to cross the A944 towards Arnhall during the same time that the toucan crossing is operating. The TAA identifies that there would be large queues of 2,699 pedestrians which would be 450m long and take 8 minutes to clear.
- 4.7 We have safety concerns regarding channelling this volume of pedestrians down from a 10m wide crossing into a 3m wide footway. This funnelling has the potential to cause a blocking effect which will quickly spread across the A944 with severe implications to the safety of pedestrians crossing and the flow of traffic as the blockage will take time to clear.
- 4.8 The arrangements for this crossing point show nothing to control vehicle movements and to stop vehicles from entering the space that it is intended pedestrians cross in. There would be a requirement for a Police Officer in both east and westbound carriageways on the A944 to stop vehicles entering the pedestrian crossing space. We would express concern that the proposals increase the burden on Police Scotland's resources. **It must be confirmed in**

writing that Police Scotland have agreed that they will provide Police Officers to carry this out – otherwise, alternative proposals should be made (such as a pedestrian overbridge).

- 4.9 Our response to the original TA requested that further information is provided in relation to the suitability of internal walking routes and the management of crossing points to accommodate large pedestrian flows mixing with large volumes of vehicular movements. **It is noted that no further detail has been provided in the TAA in relation to this and therefore we would request further comfort that pedestrian safety would not be an issue within the site itself.**

5 Cycling

- 5.1 The new modal splits presented do not account for any cyclists accessing the proposed development on a match day despite there being 220 secure cycle parking spaces proposed on site. This also differs with the original TA which predicted a limited number of cyclists accessing the site. **We would request clarity in this regard.**
- 5.2 Notwithstanding this, we would request that a suitable route from the shared use path on the A944 is identified for cyclists to access the cycle parking location identified within the site layout. **As the majority of cycle trips would likely be made from the east of the site, we would query whether providing a shared use path alongside the eastern access road has been considered as part of the proposals, and if the existing infrastructure is sufficient to accommodate this.**
- 5.3 The applicant has now acknowledged that there may be occasions when pedestrian demands on the shared use path on the A944 to the west of the proposed stadium would exceed the 300 people per hour limit identified in Cycling by Design for shared use paths. The applicant has acknowledged that this would only be for short spells on an infrequent basis, we would accept this in principle.

6 Public Transport

- 6.1 The original bus strategy contained within the TA has been revised to increase the number of shuttle services from the city centre, which is welcomed. As we previously highlighted, the city centre would remain critical in terms of restaurants / bars and the key interchange for the rail and bus stations for longer distance routes. We agree in principle that direct shuttle buses from the city centre would be more attractive to use than the alternative public bus service given it would not involve an additional walk (subject to delay) to and from Arnhall Business Park.
- 6.2 **The pickup points that have been identified in the TAA within the city centre are broadly acceptable, however, we would query whether there is sufficient capacity at the bus station to accommodate the number of buses proposed. It must also be demonstrated by means of a letter that the operator of the bus station has agreed to this.**
- 6.3 In terms of specific bus routing, it is noted that Route 1a and Route 5 would start out with the city centre at Southerhead Road and at the Bridge of Don P&R. We would note that Route 5 seems to contradict Table 4-5 of the TAA which implies

that there would be no provision at the Bridge of Don P&R for domestic (both non old firm and old firm) matches. **We would therefore request clarity in this regard.**

- 6.4 **It is also unclear from the bus strategy whether buses would pick up passengers en-route after leaving their respective departure points and we would also request further clarity in this regard.**
- 6.5 As we highlighted in our previous response, we have concerns that the bus strategy does not provide appropriate bus coverage from residential areas out with the city centre. This concern has not been adequately addressed in the subsequent letter received on behalf of the applicant or in the TAA itself.
- 6.6 Most supporters who live in Aberdeen outwith the city centre, or in Aberdeenshire, would be required to catch at least two buses to access the stadium which may take notably longer in terms of journey time in comparison to driving directly to or to within close proximity of the proposed site.
- 6.7 **We would request that the strategy is revised to incorporate some additional shuttle bus provision from noteworthy residential areas in the city and Aberdeenshire, with cognisance of season ticket holder postcode information to inform optimal routing. Routing should be designed so as to maximise coverage with all routes picking up and dropping off on the way, and at a frequency designed to ensure that from the outset public transport is highly attractive.**
- 6.8 It is noted that further discussions have taken place with Central Coaches who have confirmed that they could coordinate coaches / buses for the routes identified. ACC welcome this in principle. **However, the maximum (worst case scenario) number of busses and drivers required should be estimated, and a breakdown should be provided as to where the provision of these is likely to come from. This should be backed up by data, or written confirmation from the providers.**
- 6.9 In addition to this, it is noted that the TAA maintains that no pedestrians would walk to the stadium from the Kingswells P&R given it would be in excess of a 30 minute walk away (2.5km). From the walking isochrones presented, we would take the view that the Kingswells P&R is likely to be walked to, as it is only very marginally over 2.5km walking proximity.
- 6.10 Results from the AGCC survey are used to justify this on the basis that 96% of supporters travelling to Pittodrie Stadium by car, park within a 20 minute walk. This is most likely due to the substantial parking opportunities within a 20 minute walk of Pittodrie, and not because people won't walk further. Echoing the point raised in Paragraph 2.2, it is ACC's view that the limited nature of parking opportunities at the proposed development and the different locational characteristics would likely mean some individuals would walk in excess of 20 minutes to get to the stadium after parking their car. It is ACC's view that these results therefore cannot be used as a basis for demonstrating that there would be no pedestrians walking from the Kingswells P&R to the proposed site.
- 6.11 Instead, it is likely that the propensity to walk would be dictated by the reliability, frequency and journey time of the shuttle bus journey and crucially to what extent there is the perception that using the shuttle bus is quicker than walking to and, in particular, from the proposed stadium after a match finishes.

- 6.12 It is noted that the departure profiles shown for the shuttle buses to Kingswells Park and Ride (Appendix E) after a match concludes are spread over an hour. Only 610 of the 1500 supporters identified as using the Kingswells P&R for a non-old firm domestic match would likely be able to get back within a 30 minute period, *assuming* buses could operate in free flow conditions. This assumes a 10 minute journey time (Section 4.2.7 in the TAA) which we would also note may also be dependent on the mitigation proposed at the AWPR junction.
- 6.13 Some of those remaining 890 supporters may then choose to walk to the P&R considering this would likely be quicker at this point, particularly with the perception created by a queue of people several hundred long.
- 6.14 **We would therefore request clarity as to whether it would be possible for 100% of supporters to return to the Kingswells P&R via shuttle bus immediately after a match concludes, within a total journey time of 30 minutes, for all match scenarios?**
- 6.15 No further detail has been provided regarding the nature of bus stop provision at Arnhall Business Park by the applicant in the TAA; albeit it is acknowledged that only 280 supporters have been identified as using the public bus service. **Further confirmation that there is sufficient waiting space for both pedestrians and buses is therefore requested without restricting excessively the movement of other pedestrians and vehicles.**
- 6.16 In terms of bus priority measures, it is noted that Section 4.2.4 of the TAA identifies that there exists the potential for all general traffic to be held for a 15 minute period to allow non-car modes to exit the site. This is to be welcomed as a means of prioritising bus travel, however, we would note that there may still be some traffic associated with the development on the A944 travelling from Westhill and Arnhall which cannot be controlled.
- 6.17 It is noted that bus priority measures have been assessed in the modelling, which has constituted bus lanes on the A944 approaching the grade separated AWPR roundabout. The results demonstrate significant levels of queuing. No other bus priority measures have been proposed and therefore it is assumed that no other measures are being considered.
- 6.18 It is noted that swept paths have been provided by the applicant for the bus access junction. **Whilst this appears to be broadly acceptable, we would request that a drawing with the road markings included is provided to confirm that the swept paths do not encroach into the offside lane on the A944.**

7 Parking

- 7.1 It is noted that on-site parking has reduced from the previous provision of 1,600 spaces to 1,350 spaces which the TAA identifies would align with ACC maximum parking standards. Due to the scale of the car park, in line with the Council's Parking Standards it would be necessary for a number of electric charging points to be included.
- 7.2 We would point out that this is still in excess of the maximum parking standards by 17 spaces for a stadium with a capacity of 20,000 seats on the using the ratio of 1 space for every 15 seats. **Should the site gain planning consent, we would seek a suitable condition to limit the number of spaces to 1,333**

to ensure that provision is being provided in line with ACC maximum parking standards.

- 7.3 **The TAA has not identified the number of disabled spaces now being proposed and we would request clarity on this point to confirm that this accords with ACC parking standards.**
- 7.4 It is also noted within the TAA that 100% of the 250 displaced cars that were formerly shown in the TA to have parked on site have been relocated to Dyce Park and Ride. This has been justified on the basis that Dyce constitutes the nearest Park and Ride site for 51% of supporters. Presumably the Kingswells Park and Ride would remain closer to some of the 49% remaining supporters, yet no cars have been attributed to this site. Moreover, these distributions appear to be at odds with the trip distribution plan previously contained in Appendix B of the TA. Further to this, the Kingswells P&R is closer to the stadium than Dyce, and would therefore be more attractive to a disproportionate number of drivers when compared to their journey origin. **We would request further clarity on these two points. Additionally, the applicant should seek confirmation from ACC that it is acceptable for the park and rides to be used in this capacity, and that they have the capacity required to meet the demand.**
- 7.5 We previously requested that confirmation is provided that the 600 spaces at the Arnall Business Park would be available during matches with an evening kick off. We also requested that further detail is provided in relation to the area's suitability to accommodate car parking, drop offs / pick-ups and taxis. **It is noted that these aspects have not been identified in the TAA and we would request clarity in this regard.** We would also re-iterate that an off-site parking arrangement with a third party and out with the redline boundary of the site is not enforceable within the planning system.
- 7.6 Echoing the point raised previously in Paragraph 6.11, we would disagree with the notion that supporters will only park and walk within 20 minute proximity, as currently occurs at Pittodrie Stadium. Accordingly, should the proposed stadium gain planning consent, it remains ACC's view that a CPZ should be implemented over a 2.5km proximity of the site (30 minute walk). Further monitoring beyond this distance would be undertaken with a view to extending this further, if deemed necessary by the Council. **This would form a condition of the consent attached to the scheme, should it gain planning approval.**
- 7.7 We have previously requested, and still require, confirmation from the applicant that Police Scotland would enforce the CPZ in Westhill. This has not been provided in writing and we have concerns as other CPZs elsewhere in the country are not being enforced. Additionally it is unclear how a CPZ in Westhill would be enforced if the police are unwilling, as parking is not decriminalised in Aberdeenshire, and Westhill is outwith Aberdeen City Council's jurisdiction.
- 7.8 Essentially the development is being proposed with a level of car parking far in excess of that which maximum parking standards would allow. Within the red line boundary, parking broadly in line with maximum standards will be provided. There is further parking within Arnhall, at the Kingswells and Dyce P&Rs, and potentially unrestricted, free, parking in the Westhill Residential area (depending the outcome of CPZ discussions) - all of which will essentially act as remote car parking, is proposed. This high level of car parking is against transport planning policy and does nothing to encourage travel by sustainable modes, as required by transport planning policy. Shared use of parking could be encouraged as it

demonstrates efficient land use, but in this case only if parking is not provided within the site. It would appear that there is nothing that can be done to require, enforce or restrict off-site parking provision through the planning process. It will however be taken into account when determining the Roads Sections response.

8 Development Vehicle Access, Internal Road Layout and Stage 1 Road Safety Audit

8.1 The applicant has confirmed that the main site access junction would be controlled by part time traffic signals during match times with the offside lane operating as a right turn only lane alongside a specific right turn bay provision. The entry into the side would constitute two lanes before a match which would then switch to two lanes at the end of a match, achieved through traffic management. It is understood that outwith match times, the junction would revert to a 'left in – left out' priority arrangement.

8.2 It is noted that a Stage 1 Road Safety Audit (RSA) has been submitted alongside the proposals to appraise the access arrangements. This has highlighted one safety observation with this junction arrangement, relating to safety issues with the manual erection of bollards and has recommended electronic bollards to overcome this.

8.3 **ACC have serious safety concerns over the operation and design of this junction which require to be addressed, and would express serious concern that these were not highlighted in the RSA.** These concerns relate to:

- Potential driver confusion considering the junction would have to be painted concurrently with stop lines and give way markings on exit from the site;
- Potential driver confusion considering drivers accessing the site in the right turn lane before a match would be driving over the stop line / give way markings of one of the exit lanes and may think they had encroached into oncoming traffic;
- Potential driver confusion considering the offside lane of the A944 (westbound) would switch from a straight ahead lane out with match times to a right turn only lane for matches;
- The stop lines on the A944 arms of the junction would be subject to continual wear throughout the week with constant 40mph traffic running over them and would require to be appropriately maintained;
- The right turn lane appears to be shown to be painted with hatched markings which may result in vehicles losing control when driving in wet conditions;
- A build up of material in the right turn lane caused by infrequent use creating a situation where vehicles have reduced grip;
- While there are other examples of part time signals in Scotland there are none in the north-east and drivers will be unfamiliar with this operation;
- Where there are part time signals in operation they operate at regular times whereas those proposed will be irregular and infrequent; and
- The bollards are only shown to be over the opening in the central reservation itself out with match times and there is a risk that unfamiliar drivers may enter the right turn lane anyway before having to merge back into traffic.

8.4 Notwithstanding these issues, the DfT generally has a presumption against part time signals at new junctions given that their presence out with this environment

generally compromise the clear understanding and in turn, safety, of the junction.

- 8.5 We would also identify that ACC would have a notable maintenance responsibility to ensure stop lines were appropriately repainted at regular intervals and ensuring the right turn lane would be free of road debris for match days. ACC would also not accept maintenance responsibility for electronic bollards.
- 8.6 It is also unclear from the proposals how the two lanes into the site from the A944 would be appropriately managed so as to ensure that vehicles would be in the correct lane for their relevant car park.
- 8.7 It is identified in section 5.11.5 of the TAA that there is the potential for Police Scotland to step in and control the main access junction. **It should be confirmed in writing from the Police service that Police Scotland have agreed to this.**

9 Traffic Impact Assessment

- 9.1 The comments provided below relate specifically to the junction modelling undertaken at the three existing junctions within the jurisdiction of ACC as well as the site access junction.
- 9.2 We would reiterate the issues previously highlighted in Paragraphs 2.4, 2.7, 3.4 and 7.4, which have critical and direct relevance to the modelling methodology adopted. The safety issues raised at the site access junction in Paragraph 8.3 are also of direct relevance to the modelling undertaken at this junction.
- 9.3 It is noted that that new ATC surveys were carried out in March 2017 to validate the baseline flows within the traffic modelling following previous comments made regarding the diversionary route being in place. The TAA suggests that these 2017 counts have been used as an alternative to base the traffic adjustment factors upon. This is considered to be an acceptable approach.
- 9.4 We note that the previously agreed Paramics flows have been replaced with ASAM flows at the request of Transport Scotland at the AWPR/ A944 junction. We would not however necessarily agree with this as the ASAM flows have been shown repeatedly to underestimate traffic flows, and reflective of this we note that the ASAM flows show substantially lower flows than the Aberdeenshire Paramics flows previously used.
- 9.5 This application is not contained within the Local Development Plan and so we would confirm that it would be expected that the assessment take full account of all LDP allocations in the area, in both Aberdeen City and Aberdeenshire.
- 9.6 We note that the Paramics base flows have been used at the other junctions, and assume that all Aberdeen City LDP content has been replaced with TA derived flows. **Confirmation of this should be provided.**
- 9.7 It is also acknowledged that the baseline traffic flows appear to incorporate traffic flows from the individual committed developments' Transport Assessments and not directly from ASAM. This is considered to be acceptable as a way by which to robustly assess the impact of the development.
- 9.8 The applicant has identified that the trip distribution for 'everyday' use of the stadium has been identified within Appendix A of the original TA. From this, the trip distribution appears to have been devised based upon a simple population

gravity model for anticipated 2022 population distributions. This methodology is considered to be acceptable.

- 9.9 Notwithstanding the above, the analysis shows that the AWPR roundabout under construction will require modification to accommodate the traffic flow. It is proposed that Police Scotland man critical points in the junction and that widening into the central reservation of the A944 will be required. The proposed changes have been modelled in Linsig.
- 9.10 While this is clearly Transport Scotland's junction, a large part of the impact is predicted on the A944. The Council would comment that Linsig analysis in no way represents operation under Police control. Traffic signals will have a far greater degree of coordination and therefore the results will likely be worse than those reported, and the Police will have difficulty coordinating over such a large area. While the Police do carry out traffic management duties at events, these appear to generally relate to safety issues, in particular pedestrian safety issues and they may be less willing to be present to resolve capacity issues. Use of Police resources to resolve junction capacity issues would be a last resort and not something that could be considered to mitigate new development. **It is unclear if Police Scotland practically could, or would, undertake this responsibility. As such, the only mitigation that Aberdeen City Council would be willing to accept is traffic signals on the roundabout. The extent of which should be investigated by the applicant with input from Aberdeen City Council.**
- 9.11 A sensitivity test has been carried out with 40% background, 70% stadium traffic in a 30 minute period. It is unclear why when the time period has been reduced by 50%, the background traffic has been reduced by 60%. **Clarification is required as to the reasoning behind these percentages.**
- 9.12 The Linsig results including the mitigation show substantial queuing in the circulatory carriageways of the A944/ AWPR roundabout. **It should be confirmed that there is sufficient space within the roundabout to accommodate queuing without blocking adjacent nodes.**
- 9.13 Paragraph 5.8.31 states that "It is anticipated that during high profile matches... there could potentially be lower background traffic than on a typical Saturday when the stadium is not in use". This assumption has not been justified, nor has the scale to which the background traffic would reduce been justified and it is noted that a 20% reduction has been assumed. **This should be clarified.** It should also be considered that the TA is required to assess the full demand on the network.
- 9.14 Paragraph 5.8.32 states that "It is anticipated that the junction would operate better than the analysis predicts." **It should be clarified on what basis this is made, and how much better the junction will operate.** This issue arises in several other parts of the analysis, including notably in 5.10.10.
- 9.15 Paragraph 5.9.4 states that a queue of 78 PCUs on the A944 East arm of the Kingswells roundabout is acceptable. This correlates to the arm being 20% above the point which would be considered at practical capacity, and a queue 76 vehicles longer than the base scenario. **It should be clarified why an arm this far above capacity is considered to be acceptable.**
- 9.16 The Arnhall roundabout has taken into account committed approvals that have yet to be implemented. It is therefore unclear how the junction will operate without these third party improvements taken into account.

9.17 Notwithstanding the above comments, a number of issues raised elsewhere in this report will affect the modelling results, and without these being resolved we are unable to make full comment on the network performance. It should be noted that the majority of these issues are changes from the original TA which have not been scoped.

10 Travel Plan

10.1 The applicant has identified that they propose to prepare a Travel Plan Framework to accompany the planning application, however, this has not been received. **We would request clarity on the status of this.**

11 Construction Consent

11.1 The (access junction layout/local road improvements/internal road layout/etc) are to be designed to Aberdeen City Council standards. The development will require to be subject to a (Section 56/Section 21 Roads Construction Consent procedure) and I would urge the applicant to contact Colin Burnet on 01224 522409 to discuss this matter in further detail.

12 Conclusion

There are outstanding issues in respect of this planning application. I will be in a position to make further comment on receipt of the requested information.

Roads Development Management