

Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

Name	Mr	Mrs	Miss	Ms	
Organisation					
On behalf of (if relevant)					
Address					
Postcode					
Telephone					
E-mail					

Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan Proposed Supplementary Guidance Proposed Action Programme Strategic Environmental Assessment Environmental Report		
Policy/Site/Issue		Paragraph(s)	

What would you like to say about the issue?

What change would you like to see made?

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1st June.**

Thank you. For more information, please visit www.aberdeencity.gov.uk/aldp2016 or to contact the Local Development Plan Team call 01224 523470.

Data Protection Statement

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

Aberdeen Local Development Plan Proposed Plan – March 2015

Statement of Representation

On behalf of:

Shell UK Limited

In respect of:

- 1) Support for Policy B6 Pipelines, Major Hazards and Explosive Storage Sites**
- 2) Allocations proposed within Pipeline Consultation Zones**
- 3) Amendment to Policy R8 Renewable and Low Carbon Energy Developments**

JOHN HANDLEY ASSOCIATES LTD

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May 2015

Aberdeen Local Development Plan Proposed Plan – March 2015

Statement of Representation On behalf of Shell UK Limited

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- Appendix 2: Extracts from Aberdeen City & Shire SDP Examination Report – January 2014
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1.0 Introduction & Overview

- 1.1 This Statement has been prepared by John Handley Associates Ltd, Chartered Town Planning Consultants. It is submitted on behalf of Shell UK Ltd, the owners and operators of some of the oil and gas pipelines that cross the City of Aberdeen Council Area.
- 1.2 It is submitted in response to the publication of the Proposed Aberdeen Local Development Plan (LDP) in March 2015, and follows on from our client's previous submissions on the Main Issues Report (MIR) in March 2014 where we raised a number of matters relating to the protection and safeguarding of oil and gas pipelines. A copy of our submission on the MIR is attached as Appendix 1.
- 1.3 On behalf of our client, we welcome this opportunity for further engagement in the Aberdeen LDP process and wish to provide the following comments on the Council's Proposed Plan.
- 1.4 Whilst we have reviewed the Proposed LDP in its entirety, and the various documents that have been prepared by the Council in support of the Proposed LDP, this submission is restricted to matters relating to the protection and safeguarding of oil and gas pipelines which were raised in our submissions at the MIR stage. This includes:
- our support for ***Policy B6 Pipelines, Major Hazards and Explosive Storage Sites***;
 - a requested amendment to ***Policy R8 Renewable and Low Carbon Energy Developments*** and the associated ***Supplementary Guidance on Wind Turbine Development*** to make specific reference to the pipeline consultation zones that cross the Aberdeen area, and to advise that any wind turbine development proposed within these consultation zones must accord with the Health and Safety Executive's PADHI Guidelines. Reference should also be made to the Guidance prepared by the United Kingdom Onshore Pipeline Operator's Association (UKOPA) regarding the siting of wind turbines close to high pressure pipelines;
 - minor amendments to a number of site allocations to ensure appropriate reference to pipeline consultation zones and accordance with the Health and Safety Executive's PADHI Guidelines.
- 1.5 Full details on these recommended changes and the justification for making these changes are set out below. As requested, a Comments Form has also been completed setting out these points. But for completeness, and ease of reading, this Statement sets out our combined response to the Proposed LDP as it relates to our client's particular area of interest.

2.0 Background & Policy Context

- 2.1 The Shell NGL Pipeline System extends from St Fergus in Aberdeenshire to Mossmorran and Braefoot Bay in Fife. Subsequently it runs through several Council areas including part of the City of Aberdeen Council's administrative area. The movement of oil and gas through these pipelines is a safe and sustainable method of transporting a potentially hazardous yet extremely beneficial substance throughout Scotland and the Aberdeen and Aberdeenshire area. As such, we consider that it is essential to highlight the importance of these pipelines at a local level in the replacement Aberdeen Local Development Plan.
- 2.2 This approach would be consistent with the current policy position set out in the current Aberdeen Local Development Plan, and is also supported by the National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP).
- 2.3 As recognised in NPF3, there is also potential to utilise the existing pipeline infrastructure as an integral part of future CCS projects linking the North Sea to central Scotland.

National Planning Framework 3 (June 2014)

- 2.4 NPF3 was issued in June 2014 and provides the statutory framework for Scotland's long-term spatial development. It sets out the Scottish Government's spatial development priorities for the next 20 to 30 years. Planning authorities are required to take the Framework into account when preparing development plans and it is a material consideration in the determination of planning applications.
- 2.5 The importance of the oil and gas sector, including the role of existing infrastructure to serve these industries, is noted throughout NPF3. This includes specific references at paragraphs 2.37; 3.3 and 3.20. These paragraphs are copied below.

"2.37 We are working with the oil and gas sector to maintain the competitiveness of the industry and capitalise on skills, experience and existing infrastructure. There will be significant opportunities for increased production from oil and gas reserves in the West of Shetland and northern North Sea, and for decommissioning of existing infrastructure reaching the end of its life. Many of the sites identified in our National Renewables Infrastructure Plan have the potential to benefit from this. Existing assets – like Sullom Voe, the adjacent TOTAL gas plant and the Flotta oil terminal – will continue to play an important economic role".

"3.3 Scotland is estimated to account for nearly 60% of total EU oil and gas reserves. This forms our largest industrial sector, contributing an estimated £22 billion to Scotland's GDP in 2012. The industry employs around 200,000 people across Scotland by supporting the wider economy".

“3.20 In the long-term, we expect that a CCS network may emerge around the Forth, where there is a particular cluster of industrial activities and energy generation and the potential to link to existing pipeline infrastructure. By building expertise, and ultimately connecting this network beyond our national boundaries, there will be scope for the CCS sector to generate significant employment and business opportunities for Scotland.

- 2.6 Further reference is also made to the potential future role of pipelines within the proposed Carbon Capture and Storage Network Infrastructure throughout Scotland on page 72 of NPF3.

Scottish Planning Policy (June 2014)

- 2.7 The significance of these pipelines is further recognised in the updated Scottish Planning Policy which was published in June 2014.

- 2.8 The importance of the oil and gas industry as one of Scotland's biggest employers and a significant contributor to the Scottish economy is specifically recognised at paragraph 235 of the Scottish Planning Policy, which confirms that the planning system should recognise the national benefit of oil and gas production in maintaining a diverse energy mix and improving energy security.

- 2.9 Further guidance is set out at paragraphs 99 and 107 on pages 25 and 26 of the SPP. Paragraph 99 confirms the need to identify and safeguard oil and gas pipelines through the development plan process:

“99. Strategic development plans and local development plans outwith SDP areas should identify any nationally important clusters of industries handling hazardous substances within their areas and safeguard them from development which, either on its own or in combination with other development, would compromise their continued operation or growth potential. This is in the context of the wider statutory requirements in the Town and Country Planning (Development Planning) (Scotland) Regulations 2009 to have regard to the need to maintain appropriate distances between sites with hazardous substances and areas where the public are likely to be present and areas of particular natural sensitivity or interest”.

- 2.10 Specific reference is also made at paragraph 107 to the requirement for development to accord with the Health and Safety Executive's advice:

“107. Proposals for development in the vicinity of major-accident hazard sites should take into account the potential impacts on the proposal and the major-accident hazard site of being located in proximity to one another. Decisions should be informed by the Health and Safety Executive's advice, based on the PADHI tool.”

Aberdeen City and Shire SDP (March 2014)

2.11 The importance of the pipelines crossing Aberdeen and Aberdeenshire is also acknowledged in the approved Strategic Development Plan (SDP), and paragraph 4.10 on page 29 of the Aberdeen City and Shire SDP confirms the strategic importance of the existing pipelines.

2.12 Whilst there is no specific policy in the SDP dealing with the identification and safeguarding of pipeline corridors, in his Report to Scottish Ministers following the SDP Examination, the Reporter concluded that it is a requirement for Local Development Plans to take account of major hazardous installations (including oil and gas pipelines). Following submissions by our client on this topic, the Reporter concluded that:

"I consider the safeguarding of land around existing pipelines to be more likely to be an issue for local development plans to address, due to the site-specific nature of the safeguard required and the absence of obvious cross-boundary implications. I note that paragraph 41 of Circular 6/2013 does not identify this as an expected topic for strategic development plans. I conclude that no modification to the plan is required." (paragraph 53, page 53 of the DPEA's Report to Scottish Ministers on the ACASSDP).

2.13 A copy of the relevant extracts from the Reporter's Report is enclosed as Appendix 2.

3.0 Policy B6 Pipelines, Major Hazards and Explosive Storage Sites

- 3.1 Given this clear policy support set out in the NPF, SPP and SDP; and the acknowledgment of the importance of this sector to the local and national economy, it is essential that these pipelines are appropriately recognised and protected at a local development plan level. Planning policy should also ensure that pipelines are safeguarded in line with current HSE Planning Advice for Developments near Hazardous Installations (PADHI) Guidelines.
- 3.2 As currently drafted, the Proposed LDP covers this requirement through **Policy B6 Pipelines, Major Hazards and Explosive Storage Sites** which is set out on page 45 of the Proposed LDP. This policy is copied below:

Pipelines, Major Hazards and Explosives Storage Sites

3.73 Within Aberdeen City, there are a number of high pressure pipelines and sites where hazardous substances or explosives are stored. For each of these sites a consultation zone has been established by the Health and Safety Executive to ensure that only appropriate new or replacement development takes place and that there is no increased risk to public safety.

Policy B6 Pipelines, Major Hazards and Explosives Storage Sites

Where certain types of new development are proposed within the consultation zones of pipelines, major hazards and explosive storage sites, the Council will be required to consult the Health and Safety Executive (HSE) to determine the potential risk to public safety. The Council will take full account of the advice from the HSE in determining planning applications. In addition to consultation with the HSE, the Council will consult the operators of pipelines where development proposals fall within these zones. Pipeline consultation zones are shown on the LDP Constraints Map.

- 3.3 The inclusion of this Policy in the replacement LDP is welcomed and fully supported by Shell UK Limited. This provides a clear and consistent policy approach to this important land use matter, and accords with the requirements of the NPF and SPP.

- 3.4 We also support the identification of the various pipeline consultation zones that cross the Aberdeen City area on the Additional City-wide Proposals Map which forms part of the new LDP.
- 3.5 This approach will also ensure that pipeline operators, developers, and local residents are fully aware of any development proposals which may impact upon the pipeline system. This should in turn ensure that any proposed development is in accordance with the HSE Planning Advice for Developments near Hazardous Installations (PADHI) Guidelines.
- 3.6 We would therefore request that Policy B6 is maintained in the LDP as it proceeds to formal adoption.

4.0 Assessment of Allocations within Pipeline Consultation Zones

- 4.1 At the MIR stage we requested that the existing consultation zones for notifiable installations and pipelines should be considered when assessing and determining where there may be capacity to accommodate new development in the Aberdeen City area.
- 4.2 We requested that full consideration of these pipeline consultation zones should be taken into account when identifying any new development allocations in the Proposed LDP. This equally applied to the urban, green belt and rural areas.
- 4.3 We also recommended that if any new development allocations are proposed then proper account must be taken of the advice of the Health and Safety Executive as set out in the Planning Advice for Developments near Hazardous Installations (PADHI) Guidelines.
- 4.4 This was of particular significance in respect of the assessment of potential development sites being promoted in the Dyce, Kingswells, Westhill and Peterculter areas; and our MIR submission (see Appendix 1) commented on a number of proposals within these areas which are located within existing pipeline consultation zones.
- 4.5 Following the publication of the Proposed LDP we have carried out a review of all development sites set out in the Proposed Plan and appraised these against the pipeline consultation zones covering the Shell NGL Pipeline System as it crosses the Aberdeen LDP Area. The NGL Pipeline System lies to the north and west of the City, and runs through and close to a number of existing built-up areas, including Dyce, Kingswells and Westhill.
- 4.6 We are pleased to note that the pipeline consultation zones have, in the main, been acknowledged within the Proposed LDP. This includes references in *Appendix 2: Opportunity Sites* (pages 78 to 90 of the Proposed LDP) to the pipeline consultation zones in respect of Sites **OP23 – Dyce Drive**; **OP34 – East Arnhall**; and **OP44 – North Lasts Quarry**.
- 4.7 However, there is no standard wording being used, and the note under **OP44 – North Lasts Quarry** refers to the current LDP Policy B15, and not the new LDP Policy B6. Whilst this is a minor matter, we believe it is important for reasons of clarity and consistency to make all references the same and to refer to the updated LDP Policy.
- 4.8 Of more concern, is the lack of reference to the pipeline consultation zones within Sites **OP24 – A96 Park & Ride** and **OP63 – Prime 4 Business Park Phase 5 Extension**. Both of these sites are located within a pipeline consultation zone. As such, an appropriate reference to LDP Policy B6 should be included in Appendix 2 as it relates to these sites.
- 4.9 We have set out below an extract from Appendix 2 of the Proposed LDP with these sites highlighted.

Appendix 2 - Opportunity Sites

Site	Site Name	Site Size	Policy	Other Factors
OP23	Dyce Drive	108 ha	Business and Industrial Land /Green Space Network	Planning Brief for site approved in 2004. This site may be at risk of flooding. A flood risk assessment will be required to accompany any future development proposals for this site. The site lies within a pipeline notification zone.
OP24	A96 Park & Ride	6.7 ha	Land for Transport	Land reserved for Park and Choose.
OP34	East Arnhall	1.0 ha	Land Release Policy	An opportunity for development of 1 ha of employment land. A masterplan with Aberdeenshire Council involvement would be desirable given that the site borders the Local Authority boundaries. Site may be at risk of flooding. A flood risk assessment will be required to accompany future development proposals Site lies within a pipeline notification zone.
OP44	North Lasts Quarry	8.01 ha	Green Belt	Ongoing mineral extraction. Planning Permission granted in February 1997 to continue hard rock extraction. The site lies within a pipeline consultation zone and all development should conform to the terms of Policy B15 – Pipelines and Controls of Major Accident Hazards. Site may be at risk of flooding. Flood Risk Assessment required to accompany any future development proposals.
OP63	Prime 4 Business Park Phase 5 Extension	12.7 ha	Specialist Employment	Expansion to existing allocation. Masterplan required. A TIA will be required. In addition, adequate buffer zones for the Quaker burial ground and the woodland will need to be identified in the masterplan.

Reference to pipeline consultation zone, Policy B6 and HSE PADHI Guidelines should be included in all Sites above

Extract from Appendix 2 of the Proposed LDP with Site References highlighted.

4.11 For consistency and clarity, we would request that the same approach should be adopted in respect of all of the above sites as they all fall within pipeline consultation zones.

4.12 We would recommend the following wording is used in all of these proposals:

“The site lies within a pipeline consultation zone and all development should conform to the terms of Policy B6 – Pipelines, Major Hazards and Explosive Storage Sites”.

New Development Allocations

4.13 In addition to this requested amendments to the allocated sites OP23; 0P24; OP34; OP44; and OP63, we would also request that in the event that any settlement boundaries are to be reviewed following the publication of the Proposed LDP, and any new or expanded development allocations made, that full recognition must be given to the existence of any pipeline consultation zones and development allocations made in accordance with the relevant PADHI Guidelines. If any additional land allocations are proposed following the publication and consideration of the Proposed LDP (either by the Council or the Reporter at the Examination stage), full recognition must be taken of the existence of the oil and gas pipelines that run through the Aberdeen LDP area.

4.14 Any new development allocations proposed in close proximity to these pipelines must be assessed against the advice of the Health and Safety Executive, and any new allocation must stress the need to ensure new development is undertaken in accordance with PADHI Guidelines. We would welcome the opportunity to provide further advice in this respect should this be required.

5.0 Policy R8 Renewable and Low Carbon Energy Developments

- 5.1 For the same reasons, and as noted in our submissions on the MIR (see Appendix 1), we would also suggest that there is a need for **Policy R8 Renewable and Low Carbon Energy Developments** and the related **Supplementary Guidance on Wind Turbine Development** to take into account and specifically include reference to the pipeline consultation zones that cross the Aberdeen LDP Area.
- 5.2 As currently drafted, neither Policy R8 (as set out on page 68 of the Proposed LDP and copied below) nor the Supplementary Guidance on Wind Turbine Development make any references to the pipeline consultation zones.

Renewable and Low Carbon Energy Developments

3.141 The development of all types of renewable heat and energy generating technologies, on all scales, is supported in principle. A positive approach to renewable development will help to meet the Scottish Government's target for 100% of Scotland's electricity to be generated from renewable sources by 2020 and 11% of heat demand to be met by renewable sources.

3.142 In preparing this plan a spatial framework for wind turbines was undertaken. The process has not identified any areas of search for wind turbines as there are constraints across the entire Aberdeen City area. This does not preclude the development of wind turbines, but it means that care must be taken in assessing the impact of proposals. This will be done in line with Supplementary Guidance Wind Turbine Development.

Much of the onshore renewable energy capacity in the North East of Scotland will come from large scale developments, such as wind farms, which are more difficult to accommodate in urban locations than in more rural locations. However, there will be a range of energy technologies that are more suited to urban locations. These range from single wind or hydro turbines through to gas or biomass fired Combined Heat and Power systems, ground source heat pumps, and devices which can be mounted on existing buildings (some of which are classed as permitted development). Supplementary Guidance on appropriate technologies will be provided through masterplans and the forthcoming low carbon city energy strategy, as well as Supplementary Guidance on Heat Networks.

Policy R8 - Renewable and Low Carbon Energy Developments

The development of renewable and low carbon energy schemes where the technology can operate efficiently and the environmental and cumulative impacts can be satisfactorily addressed will be supported in principle, if proposals:

- 1 Do not cause significant harm to the local environment, including landscape character and the character and appearance of listed buildings and conservation areas.
- 2 Do not negatively impact on air quality.
- 3 Do not negatively impact on tourism.
- 4 Do not have a significant adverse impact on the amenity of dwelling houses.

Wind energy developments will need to conform with Supplementary Guidance Wind Turbine Development, detailed below, and meet the following specific requirements ensuring that:

- 1 Development does not give rise to electro-magnetic interference to aviation communication, other telecommunications installations, or broadcasting installations.
- 2 Development does not result in a significant cumulative effect on landscape and natural heritage.
- 3 Free standing wind turbines are set back from roads and railways a distance greater than the height of the turbine.
- 4 Turbines are 10 rotor diameters from residential properties.

Appropriate conditions (along with a legal agreement under Section 75, where necessary) will be applied, relating to the removal of wind turbine(s) and associated equipment, and to the restoration of the site, whenever the consent expires or the project ceases to operate for a specific period.

Extract from page 68 of the Proposed LDP showing current Policy R8 and supporting text

- 5.3 Clearly in light of the policies discussed in sections 2.0 and 3.0 above, it is essential to ensure that any wind turbine development does not compromise public health or safety.
- 5.4 On this basis, we would request that Policy R8 should be amended to make specific reference to the pipeline consultation zones that cross the Aberdeen area, and advise that any wind turbine development proposed within these consultation zones must accord with the Health and Safety Executive's PADHI Guidelines. Reference should also be made to the Guidance prepared by the United Kingdom Onshore Pipeline Operator's Association (UKOPA) regarding the siting of wind turbines close to high pressure pipelines. A copy of this Guidance note was submitted with our submission on the MIR, and is attached again as Appendix 3.
- 5.5 We would were therefore request that a new criteria is inserted (as point 5) within **Policy R8 Renewable and Low Carbon Energy Developments** which states that:
- "Any turbines proposed within pipeline consultation zones must accord with the requirements of the Health and Safety Executive's PADHI Guidelines and the Guidance prepared by the United Kingdom Onshore Pipeline Operator's Association (UKOPA) regarding the siting of wind turbines close to high pressure pipelines. Further details are set out in the Supplementary Guidance on Wind Turbine Development".*
- 5.6 Appropriate amendments should also be made to the related Supplementary Guidance on Wind Turbine Development, with specific reference to the UKOPA Guidelines set out in the "Further Information" section of the Supplementary Guidance.
- 5.7 These amendments would ensure that any potential conflicts between these uses are avoided, and we would be happy to provide further information on this matter should this be required.

6.0 Summary & Recommended Changes

6.1 In summary, we wish to confirm our client's general support for the approach for the LDP's development strategy as set out in the Proposed LDP.

6.2 We also support the inclusion of **Policy B6 Pipelines, Major Hazards and Explosive Storage Sites** and the identification of the various pipeline consultation zones that cross the Aberdeen City area on the Additional City-wide Proposals Map. This approach will ensure that pipeline operators, developers, and local residents are fully aware of any development proposals which may impact upon the pipeline system. This should in turn ensure that any proposed development is in accordance with the HSE Planning Advice for Developments near Hazardous Installations (PADHI) Guidelines.

6.3 We would therefore request that Policy B6 is maintained in the LDP as it proceeds to formal adoption.

6.4 However, for the reasons set out in this Statement, we would also request the following amendments to the Proposed LDP:

- Specific reference to Policy B6 and the pipeline consultation zones and PADHI Guidelines should be made on a number of allocated and safeguarded sites. This includes new or amended references inserted at the following allocated sites **OP23; OP24; OP34; OP44;** and **OP63** within Appendix 2 of the Proposed LDP. This would provide further clarity and would ensure that the new LDP sets out an appropriately worded policy reference to safeguard these pipelines as a strategically important transportation facility. It would also inform and guide any proposed development near the existing pipelines which run through the LDP area.
- For similar reasons, and in the event that any settlement boundaries are to be reviewed and new or expanded development allocations made, we would request that full recognition must be given to the existence of any pipeline consultation zones. Any new development allocations proposed in close proximity to these pipelines should take account of and reflect the advice of the Health and Safety Executive in accordance with the relevant PADHI Guidelines.
- **Policy R8 Renewable and Low Carbon Energy Developments** and the associated **Supplementary Guidance on Wind Turbine Development** should be amended to make specific reference to the pipeline consultation zones that cross the Aberdeen area, and to advise that any wind turbine development proposed within these consultation zones must accord with the Health and Safety Executive's PADHI Guidelines. Reference should also be made to the Guidance prepared by the United Kingdom Onshore Pipeline Operator's Association (UKOPA) regarding the siting of wind turbines close to high pressure pipelines.

6.5 We trust these requests will be given full consideration and the relevant amendments made to the Proposed LDP. We would also welcome the opportunity to discuss these points with the Council in further detail should this be required.

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Aberdeen Local Development Plan
Main Issues Report 2014

Statement of Representation

On behalf of:
Shell UK Limited

In respect of:
**Main Issue 1; Pipeline Safeguarding Policy
& Onshore Wind Spatial Framework**

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18 March 2014

Aberdeen Local Development Plan Main Issues Report 2014

Statement of Representation On behalf of Shell UK Limited

Contents:

- 1.0 Introduction & Overview**
- 2.0 Response to Main Issues & Questions**
- 3.0 Other comments on matters not identified as main issues or questions**
- 4.0 Summary & Recommendations**

Appendix 1: UKOPA Guidance for the Siting of Wind Turbines Close to High Pressure Pipelines (February 2013)

1.0 Introduction & Overview

- 1.1 This Statement of Representation has been prepared by John Handley Associates Ltd, Chartered Town Planning Consultants. It is submitted on behalf of Shell UK Ltd, the owners and operators of some of the oil and gas pipelines that cross the Aberdeen LDP Area. It follows on from our client's submissions on the Aberdeen Local Development Plan 2012.
- 1.2 On behalf of our client, we welcome this opportunity for early engagement in the replacement LDP process and wish to provide the following comments on the Council's Main Issues Report (MIR).
- 1.3 Whilst we have reviewed the full MIR, and are aware of the 13 identified main issues and the 21 separate consultation questions being posed by the Council, this submission is restricted to Main Issue 1 and matters relating to the safeguarding of oil and gas pipelines and any implications raised by the proposed settlement strategy in and around the pipeline consultation zones. Although not listed as main issues or questions, we have also provided comments on the existing pipeline policy and the spatial framework for onshore wind turbines.

Background & Policy Context

- 1.4 The Shell NGL Pipeline System extends from St Fergus in Aberdeenshire to Mossmorran in Fife. Subsequently it runs through several Council areas including a large part of the Aberdeen City administrative area. The movement of oil and gas through these pipelines is a safe and sustainable method of transporting a potentially hazardous yet extremely beneficial substance throughout Scotland and the Aberdeen area. As such, we consider that it is necessary to highlight the importance of these pipelines at a local level in the Aberdeen Local Development Plan.
- 1.5 This approach would be consistent with the current policy position set out in the current Local Development Plan, and is also supported by the Aberdeen City and Shire Strategic Development Plan (SDP). The SDP confirms the strategic importance of the existing pipelines that run through the Aberdeenshire area at paragraph 4.10 on page 28 of the Proposed SDP. This position has been supported by the Reporters following the recent SDP Examination.
- 1.6 As recognised in the SDP Proposed Plan, there is also potential to utilise the existing pipeline infrastructure as an integral part of proposed CCS projects in the St Fergus and Peterhead areas, with important links through the Aberdeenshire and Aberdeen City areas to central Scotland.

- 1.7 The significance of these pipelines is also recognised in the Scottish Planning Policy. The importance of the oil and gas industry as one of Scotland's biggest employers and a significant contributor to the Scottish economy is specifically recognised at paragraph 236 of the Scottish Planning Policy, and the preferred means of transporting oil and gas by way of pipelines is further confirmed at paragraph 238 of the SPP.
- 1.8 It is therefore important to ensure that these pipelines are recognised and protected at a local development plan level. Planning policy should also ensure that pipelines are safeguarded in line with current HSE Planning Advice for Developments near Hazardous Installations (PADHI+) Guidelines.
- 1.9 We would therefore request that the new LDP identifies the various pipeline corridors running through the Aberdeen City area and sets out an appropriate policy to safeguard these pipelines as a strategically important transportation facility, and to guide any proposed development near the existing pipelines which run through the LDP area.
- 1.10 For the same reasons, we would also request that as part of the detailed assessment of any potential new land allocations in the new LDP that full recognition is given to the existence of the oil and gas pipelines that run through the Aberdeen City LDP area.

2.0 Response to MIR Issues & Questions

- 2.1 Having set this context, we have outlined below our comments in response to Main Issues 1 of the MIR as it relates to pipeline consultation zones.

Main Issue 1 – Greenfield Housing and Employment Allocations

Do we need to add to the greenfield housing and/or employment land supply by allocating more sites?

- 2.2 For the reasons set out above, we would agree with Option 1 – the current and preferred approach as set out on page 11 of the MIR. This would carry over existing Local Development Plan allocations and would not require the release of further land from greenfield sites. As noted in the MIR, this approach would make the Local Development Plan consistent with the Strategic Development Plan and the current allocations already provide a generous supply of housing and employment sites. This would assist the objective of redeveloping brownfield sites, and would protect existing Green Belt and green spaces.
- 2.3 In terms of the proposed Settlement Strategy, we have undertaken a review of all development bid sites set out in the *Development Options Assessment Report* and appraised these against the pipeline consultation zones covering the Shell NGL Pipeline System as it crosses the Aberdeen City Area from Dyce in the north to Peterculter in the south. The NGL Pipeline System runs in a generally north east to south west direction through the Aberdeen City area, and runs along the western edge of Dyce, between Westhill and Kingswells, and then west of Peterculter. It falls within Maps 3, 4 and 5 on pages 13 and 14 of the MIR.
- 2.4 In addition to our review of the *Development Options Assessment Report*, we have also assessed the various sites listed in the following sections of the MIR:
- Table 3 : Preferred Development Options at Peterculter;
 - Map 1 : Development Bids and Representations 2013 – Recommendations;
 - Paragraph 2.2 Brownfield Sites and Other Proposals;
 - Map 3 : Dyce and Bucksburn;
 - Map 4 : Kingswells and Countesswells; and
 - Map 5 : Deeside.
- 2.5 The findings of our research are set out in the Table below which explains the location of the Shell pipelines in relation to any relevant sites.

- 2.6 We are pleased to note that the pipeline consultation zones have, in the main, been acknowledged and identified in the various Site Assessment schedules, and the existence of pipelines was included as one of the Sustainability Checklist Criteria that the various Development Options were assessed against.
- 2.7 There are, however, a number of Development Bid sites where this has not been covered. We have noted these in the Table below.
- 2.8 We have also requested that in the event that any site is considered appropriate for allocation in the new LDP, further assessment of the existing Pipeline Consultation Zones must be undertaken in conjunction with the HSE and the Pipeline Operator. Similarly, we have also requested that any new allocation must stress the need to ensure new development is undertaken in accordance with PADHI+ Guidelines. We would welcome the opportunity to provide further advice in this respect should this be required.
- 2.9 We also note and support the conclusions for these sites as set out in the Development Options Assessment Report. We also acknowledge that there are very few sites across the Aberdeen City Area recommended for inclusion in the new LDP. However, we would also highlight that the Shell pipeline crosses one of these sites – the Raiths Transport Interchange site, and runs along the western boundary of the Dyce Drive (040) site. As such, the majority of these sites will fall within the HSE consultation zone. Reference to the pipeline consultation zone was not, however, included in the Assessment of these sites and we would ask that this is reconsidered.
- 2.10 As noted above, we would also request that the allocation of these sites must accord with the PADHI+ Guidelines and any subsequent LDP allocation must confirm this. Again, we would welcome the opportunity to provide further guidance on this matter should this be required.

Map 3 : Dyce and Bucksburn

Area/ Settlement	Site Number	Name	Proposed Use	MIR Preferred Site?	Pipelines mentioned in Assessment Report?	Shell UK Response & Recommendation
Dyce	B0105	Raiths Transport Interchange	Rezoning of unused part of site for Employment use	Possible Site (subject to further consultation with transport providers).	No mention of Pipelines	<p>St Fergus to Mossmorran Pipeline crosses the northern tip of the identified site.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation in the LDP must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>
Dyce	040	Dyce Drive (Part of OP32)	Rezoning of OP32 from Specialist Employment Area to Business and Industrial Land	Desirable Site - support for rezoning.	<p>Not assessed in Development Options Assessment Report.</p> <p>No mention of Pipelines</p>	<p>St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>

Map 4 : Kingswells and Countesswells

Area/ Settlement	Site Number	Name	Proposed Use	MIR Preferred Site?	Pipelines mentioned in Assessment Report?	Shell UK Response & Recommendation
Kingswells	B0308	Prime Four North	Residential (100 to 125 dwellings)	Undesirable Site – Landscape, SAM, LNCS, School capacity constraints.	Proximity to Shell Pipeline noted.	<p>Agree with MIR recommendation.</p> <p>St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>
Kingswells	B0309	Prime Four Phase 4	Change existing zoning to a mix of employment, retail and leisure	Undesirable Site – priority habitat constraint.	No mention of Pipelines	<p>Agree with MIR recommendation.</p> <p>St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>
Kingswells	B0310	Prime Four Phase 5	Employment retail and leisure	Undesirable Site – Listed Building & landscape fit constraints.	No mention of Pipelines	<p>Agree with MIR recommendation.</p> <p>St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p>

						Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Westhill	B0931	Land at Cadgerford, Westhill	Mix of uses including: residential and commercial	Undesirable Site – Pipeline and Flooding constraints. Site does not relate well to settlement of Westhill and is not supported by SDP.	Proximity to Shell Pipeline noted.	<p>Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>
Westhill	B0932	Backhill, Westhill	Mix of uses including: residential and commercial	Undesirable Site – Flooding constraint.	Proximity to Shell Pipeline noted.	<p>Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>

Map 5 : Deeside

Area/ Settlement	Site Number	Name	Proposed Use	MIR Preferred Site?	Pipelines mentioned in Assessment Report?	Shell UK Response & Recommendation
Peterculter	B0909	Land to North of Peterculter	Residential (c.6 units)	Undesirable Site. Green Belt and accessibility constraints.	Proximity to Shell Pipeline noted.	Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone. If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator. Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Peterculter	B0920	Holemill, Peterculter	Residential or Commercial	Undesirable Site. Green Belt constraint.	Proximity to Shell Pipeline noted.	Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone. If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator. Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Peterculter	B0923	Peterculter West, Phase 1a	Residential (Phase 1 c.143 units)	Undesirable Site. Green Belt constraint.	Proximity to Shell Pipeline noted.	Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone. If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.

						Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Peterculter	B0928	Land to the West of Malcolm Road, Peterculter	Residential (c.16 units)	Undesirable Site. Green Belt, Green Space Network, LNCS, SAC, Flood Risk constraints.	Proximity to Shell Pipeline noted.	Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone. If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator. Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Peterculter	B0941	Peterculter West, Phase 1b	Residential (Phase 1 c.143 units)	Undesirable Site. Green Belt constraint.	No mention of Pipelines	Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone. If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator. Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Peterculter	B0942	Peterculter West, Phase 2a	Residential (Phase 2 c.201 units)	Undesirable Site. Green Belt constraint.	Proximity to Shell Pipeline noted.	Agree with MIR recommendation. St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone. If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.

						Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.
Peterculter	B0943	Peterculter West, Phase 2b	Residential (Phase 2 c. 36 units)	Undesirable Site. Green Belt constraint.	Proximity to Shell Pipeline noted.	<p>Agree with MIR recommendation.</p> <p>St Fergus to Mossmorran Pipeline runs to the west of the identified site, and within the HSE Consultation Zone.</p> <p>If site is considered appropriate for allocation in LDP, further assessment of existing Pipeline Consultation Zone must be undertaken in conjunction with HSE and Pipeline Operator.</p> <p>Any allocation must stress the need to ensure any new development is undertaken in accordance with PADHI+ Guidelines.</p>

2.11 As noted above, we would request that the information set out in the above table is given full consideration if any of the above sites are considered suitable for allocation in the LDP Proposed Plan. We would welcome the opportunity to provide further guidance on this matter should this be required.

3.0 Other comments on matters not identified as main issues or questions

Pipeline Safeguarding Policy

- 3.1 In addition to our comments on Main Issue 1, we would also wish to request that the existing **Policy B15: Pipelines and Controls of Major Accident Hazards** is maintained and carried forward in the new LDP, as well as the existing LDP Constraints Map which shows the location of the pipeline consultation zones. This is an important safeguarding policy and we fully support the requirement to consult with the Health and Safety Executive and facility owners and operators on all development proposals which are proposed within the various consultation zones.
- 3.2 The current policy is copied below and we would request that this is maintained in the replacement LDP.

Pipelines and Major Accident Hazards

3.38 Aberdeen contains a number of pipelines associated with the oil and gas industry. Whilst they are subject to the stringent controls under existing health and safety legislation, it is also a requirement of EU Council Directive 96/82/EC (Seveso II) to control the kinds of development permitted in the vicinity of these installations. For this reason, we have been advised by the Health and Safety Executive of consultation distances for these installations. Land within these consultation distances is shown by the pipeline notification areas on the Proposals Map. The Council will also consult the owners/operators of such installations where relevant planning applications are received.

Policy B15 - Pipelines and Controls of Major Accident Hazards

In determining planning applications for development within consultation distances for hazardous installations, the City Council will take full account of the advice from the Health and Safety Executive and will seek to ensure that any risk to people's safety is not increased.

Spatial Framework for Onshore Wind Turbines

- 3.3 Whilst not the subject of a specific main issue or question, the Council's spatial framework for onshore wind turbines which was prepared in June 2013 is mentioned at paragraph 10.5 on page 50 of the MIR.

- 3.4 The MIR notes that: *“Scottish Planning Policy expects all local authorities to have a spatial framework for onshore wind farms. An Onshore Wind Spatial Framework has been prepared to assess the opportunities for identifying areas suitable for wind turbine developments. The countryside surrounding Aberdeen within the local authority boundary is limited to a small area and together with the presence of Aberdeen Airport there is not the scope to identify suitable sites for large scale wind farms. The Local Development Plan will continue to support the principle of a wide range of renewable or low-carbon energy developments and a criteria-based policy for assessing proposals is the most appropriate method for dealing with applications for wind turbines and other renewable developments”.*
- 3.5 In response to this, and having assessed the current *Onshore Wind Spatial Framework* document, we would request that the framework for wind turbines should be reassessed to take into account and specifically include the pipeline consultation zones that cross the Aberdeen City Area. This should include reference to the Guidance prepared by the United Kingdom Onshore Pipeline Operator’s Association (UKOPA) regarding the siting of wind turbines close to high pressure pipelines. A copy of this Guidance note is attached as Appendix 1.
- 3.6 We would also suggest that a specific policy should be included in the replacement LDP to confirm the criteria for assessing wind turbines. This Policy should also include reference to the pipeline consultation zones and the UKOPA Guidelines. This would ensure that any potential conflicts between these uses are avoided. We would be happy to provide further information on this matter should this be required.

4.0 Summary & Recommendations

- 4.1 In summary, we wish to confirm our client's general support for the preferred approach for the LDP's settlement strategy as set out in the MIR and the various Site Assessment schedules.
- 4.2 We would request that in the event that any settlement boundaries are to be reviewed and new or expanded development allocations made, full recognition must be given to the existence of any pipeline consultation zones and development allocations made in accordance with the relevant PADHI+ Guidelines.
- 4.3 Whilst not a specific question or main issue, we would also request the retention of the existing 'Pipeline Policy' within the new LDP, which provides appropriate policy protection to the pipeline consultation corridors within the Aberdeen City area. This approach will be consistent with national and strategic planning policy which supports the recognition and protection of pipelines. Inclusion of such a policy in the new LDP will ensure consistency throughout the planning process.
- 4.4 Again, whilst not a specific question or main issue, we would request that spatial framework for onshore wind turbines is reassessed to take into account the pipeline consultation zones that cross the Aberdeen City area and the Guidance provided by UKOPA. A new Policy should be included within the replacement LDP to set the criteria for assessing onshore wind turbines and this should include specific reference to the pipeline consultation zones and a new criteria added to ensure that proposed new turbines are directed away from these areas where any potential conflicts between these uses arise.
- 4.5 We trust these comments will be of interest and assistance, and will be afforded due consideration in the preparation of the Proposed Plan.
- 4.6 We would be grateful if you would acknowledge safe receipt of this submission, and we would welcome the opportunity to discuss these points with you in further detail should this be required.

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**REPORT TO SCOTTISH MINISTERS ON THE PROPOSED ABERDEEN
CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN**

STRATEGIC DEVELOPMENT PLAN EXAMINATION

carried out under Section 12 of the

Town and Country Planning (Scotland) Act 1997

Reporters: Scott Ferrie MSc MRTPI
Stephen Hall BA (Hons) BPI MRTPI

Date of Report: 21 January 2014

Dee Special Area of Conservation. From the responses to the further information requests mentioned above, I gather that Scottish Natural Heritage is content to regard this matter also as resolved, provided the cross reference to mitigation in the Habitats Regulations Appraisal is included in the plan. On this basis I conclude that no reference to a water shortage plan requires to be included in the strategic development plan.

52. Stewart Milne Homes opposes the target relating to water-saving technology. As discussed above, there are particular reasons, relating to the River Dee, why water conservation is a particularly important issue in Aberdeen City and Shire. Building regulations may not be as sensitive to these regional considerations as the planning system. Paragraph 39 of Scottish Planning Policy also states that decisions on new development should promote the efficient use of infrastructure and support sustainable water management. I therefore conclude that no modification to the plan is required. In reaching this conclusion I am also mindful of the desirability of not modifying wording that has been rolled forward from the existing approved plan unless circumstances have clearly changed.

Identification and safeguarding of pipeline corridors

53. I consider the safeguarding of land around existing pipelines to be more likely to be an issue for local development plans to address, due to the site-specific nature of the safeguard required and the absence of obvious cross-boundary implications. I note that paragraph 41 of Circular 6/2013 does not identify this as an expected topic for strategic development plans. I conclude that no modification to the plan is required.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In the second sentence of paragraph 4.9, replace "energy" with "heat and power".
2. Amend the final sentence of paragraph 4.17 to read: "*During and beyond the period of this plan the effects of climate change may affect the river and appropriate adaptation measures may have to be taken by a range of organisations. This could include measures such as reducing the amount of water Scottish Water are licensed to take from the River Dee.*"
3. Amend the second target on page 31 of the plan to read: "*For the equivalent of the city region's electricity needs to be met from renewable sources by 2020.*"
4. Amend the sixth target on page 31 of the plan to read: "*To work towards at least an extra 300,000 tonnes of new waste-management infrastructure.*"
5. Add an additional bullet point after the third existing bullet point under How to meet the targets on page 31 of the plan to read: "*Local development plans (and supplementary guidance) will promote water efficiency and water saving measures in all relevant developments.*"
6. Add additional sentence at the end of paragraph 5.6 to read: "*The Habitats Regulations Appraisal of this plan contains safeguards which will need to be applied at that stage.*"

UKOPA GUIDANCE FOR THE SITING OF WIND TURBINES CLOSE TO HIGH PRESSURE PIPELINES

Date of Issue: February 2013

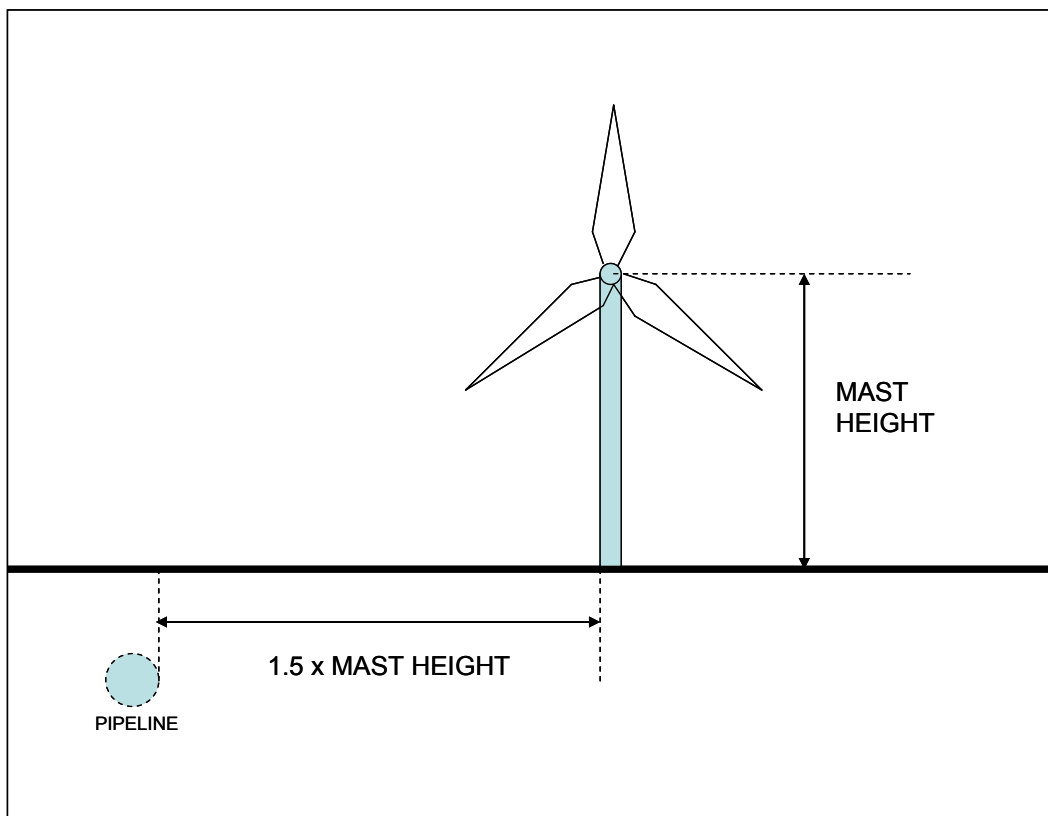
Ref: UKOPA/13/006



GUIDANCE FOR THE SITING OF WIND TURBINES CLOSE TO HIGH PRESSURE PIPELINES

Pipeline Operators are receiving increasing numbers of applications from developers to site wind turbines in the vicinity of high pressure pipelines. In response to this, a detailed technical study has been undertaken to identify the potential risks to these pipelines from wind turbines.

The study was based on data collected for wind farms in the UK and used a methodology that has been developed in the Netherlands. The study assessed all the potential failure modes that could be a potential threat to the integrity of a pipeline, including blade failure; fall of the nacelle or rotor and toppling of the mast. UKOPA have published the details of the technical study in Reference 1. A copy of this document is available on the UKOPA website.



Based on the study, the recommended distance from the nearest part of the mast of the wind turbine at ground level to the nearest part of the pipeline has been identified as a minimum of 1.5 times the turbine mast height. The mast height is defined as the height from the ground level up to the centre line of the wind turbine axle.

REFERENCE 1: *Ensuring an Adequate Separation Distance Between Wind Turbines and Buried Energy Infrastructure*, N Jackson, P Baldwin, R Andrews, Hazards XXIII, November 2012

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