



our ref: **BF/Q30195**
email: ben.ford@quod.com
date: 6 May 2015

Development Plan Team
Aberdeen City Council
Business Hub 4
Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

By Email: ldp@aberdeencity.gov.uk

Dear Sir,

**ABERDEEN CITY COUNCIL LOCAL DEVELOPMENT PLAN,
MAIN ISSUES REPORT CONSULTATION OUT FOR COMMENT UNTIL 1 JUNE 2015
ABERDEEN GAS HOLDER STATION
REPRESENTATIONS ON BEHALF OF SCOTIA GAS NETWORKS**

We are instructed by Scotia Gas Networks (SGN) to submit representations to the Main Issues Report Consultation (2015) in respect of Aberdeen's next Local Development Plan to ensure that the interests of the company are maintained; to ensure that we can be party to further consultations; and to enable the future development capacity of the site to be realised should the opportunity arise.

As such we now submit representations in accordance with the specified consultation timescales which terminates at 5pm on Friday 1 June 2015. These representations are made with specific regard to the gas holder site bounded by Greenwell Road and Greenbank Crescent, albeit the wider approach to development within Aberdeen is commented upon. The wider development context is important, as it is recognised that the former gas holder site could have an impact on the development potential of surrounding land uses by virtue of the restrictions set out in the HSE's land use planning methodology (PADHI).

This submission does not in any way propose closure or retraction of the Hazardous Substance consent but seeks to ensure that there is the appropriate flexibility should this happen over the life of the plan. Consideration of this site now is therefore considered prudent.

a) Background

The site is approximately 2 hectares in size and is located in the established East Tullos Industrial Estate on the south side of Aberdeen. Greenwell Road which lies directly to the north of the site leads directly to the A956 which in turn connects to the city centre and arterial A90. The gas holder site is a 'brownfield' site situated in an area consisting of other industrial users from relatively small multi-let terraces of local occupiers to large engineering works. Directly to the south of the site lies undeveloped land which falls within the Green Belt.



Aerial view of the Aberdeen Gas Holder Site

The site comprises a large mothballed gas holder, associated structures and hard standing. SGN have identified potential for the gasholder to be decommissioned and as such the alternative future use of the site should be considered within the next Aberdeen Local Development Plan.

Given the previous uses of the site, there are certain requirements upon SGN to remediate the site should the current operations halt. These works, alongside dismantling of associated infrastructure, can result in significant costs, which in turn require value from future land uses to fund this process.

SGN is undergoing a strategic review of its portfolio owing to the OFGEM requirement to decommission obsolete terranean gas storage facilities in favor of a subterranean pipe network. This will result in a number of gasholder sites across the United Kingdom becoming available for development over the next 5 years and certainly within the development plan period. As such we believe that the Aberdeen City Council should be proactively planning for this event as part of this decommissioning process.

The SGN Gasholders at Dunfermline in Fife are already subject to pre-application discussions regarding de-allocation and redevelopment of the existing Gas Holder site which highlights SGN's ambitions in respect of regenerating their portfolio of brownfield sites.

b) Current adopted Aberdeen Local Development Plan Proposals Map (2012)

The site is located within a recognised Business and Industry land use allocation of the adopted Aberdeen Local Development Plan (February 2012) and is subject to planning policy BI1 which states that industrial and business uses (Class 4 Business, Class 5 General Industrial and Class 6 Storage or Distribution) in these areas shall be retained and safeguarded from other development pressures.



We are concerned that the Council has not given due regard to the significant costs related to the decommissioning of the gas holder, dismantling the associated infrastructure and decontamination of the site which thus would require uses of sufficient value to ensure the redevelopment of the site is viable.

c) Aberdeen Local Development Plan 2016

SGN are currently reviewing their site portfolio and recognise the development capacity of the gas holder site at Greenwell Road and Greenbank Crescent for alternative uses.

SGN are keen to ensure that the maximum possible flexibility is available regarding the future use of the site. It is essential that the site is allocated for uses of sufficient value to ensure that the redevelopment of the site is viable. Traditional employment use would not be deliverable as these could not generate value to offset remediation costs.

The site does not provide any permanent employment opportunities at present and its appearance does not make a positive contribution to the appearance of the area. The site’s redevelopment would therefore offer an opportunity to ensure the efficient use of this brownfield site and improve its appearance, in accordance with current local development plan policies. The location of development at this site is consistent with the principles of sustainable development.

We propose that the site be included in as “white land” or for other mixed use development to include retail uses in the main issues report for consideration as a proposal in the next Aberdeen Local Development Plan (2016). Zoning of the site as “white land” will ensure that the site is not stymied from future development potential, as is currently the case. Redevelopment for alternative uses would also

remove the HSE PADHI zone limitation on surrounding development opportunities and therefore have a cumulative effect on development capacity in this location, a positive benefit to adjacent land holdings.

d) Hazardous Substances and Installations Policy

We propose that the Aberdeen Local Development Plan includes the following policy in order to enable strategic direction for the Aberdeen City area when planning for the future of Gas Holder Sites.

“Policy Hazardous Installations

***Hazardous installations will be identified in the Strategic Development Plan. The Council will take into account the need to incentivise and fund decom.*”**

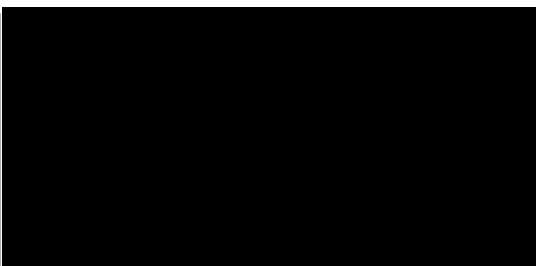
e) Conclusions

SGN object to the site zoning for the Aberdeen Gas Holders as ‘Business and Industrial’ use as this designation impedes the future development potential of the site. Such a designation does not allow for any future development proposal to be considered against the wider Strategic Development Plan policies which relate to high value generating uses, such as residential, retail and mixed-uses, which offer the flexibility necessary to bring decommissioning forward. This flexibility should be recognised with the Aberdeen Local Development Plan to reflect the comments made above, and in particular in regards to the suggested Hazardous Installations policy.

These representations deal principally with the issue of land use, albeit do not preclude our ability to make representations pursuant to other development control matters in due course.

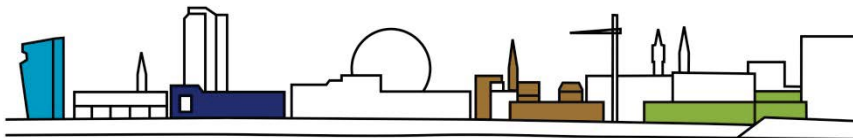
Please can you ensure that we remain on your data-base and are kept informed of the outcome of this consultation process and any future consultation proposals. We would also like to continue discussions with the Council regarding the content of these representations. Please can you confirm receipt of this letter via email to stephanie.o'callaghan@quod.com.

Yours faithfully,



Ben Ford
Director

Enc. Representation response form



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 <input type="radio"/> Mrs <input type="radio"/> Miss <input checked="" type="radio"/> Ms <input type="radio"/>	STEPHAINE O'CALLAGHAN
Organisation	QUOD	
On behalf of (if relevant)	SCOTIA GAS NETWORKS (SGN)	
Address	INGENI BUILDING 17 BROADWICK STREET LONDON	
Postcode	W1F 0AX	
Telephone	020 3597 1000	
E-mail	STEPHANIE.OCALLAGHAN@QUOD.COM	

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

What document are you commenting on?	Proposed Plan <input checked="" type="checkbox"/> Proposed Supplementary Guidance <input type="checkbox"/> Proposed Action Programme <input type="checkbox"/> Strategic Environmental Assessment Environmental Report <input type="checkbox"/>			
Policy/Site/Issue	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">POLICY BL1 SITE: ABERDEEN GAS HOLDER STATION</td> <td style="width: 20%;">Paragraph(s)</td> <td style="width: 20%; text-align: center;">N/A</td> </tr> </table>	POLICY BL1 SITE: ABERDEEN GAS HOLDER STATION	Paragraph(s)	N/A
POLICY BL1 SITE: ABERDEEN GAS HOLDER STATION	Paragraph(s)	N/A		

What would you like to say about the issue?

WE OBJECT TO THE DESIGNATION OF THE ABERDEEN GAS HOLDER SITE AS 'BUSINESS & INDUSTRIAL' USE.
(PLEASE SEE COVER LETTER FOR FUTURE DETAIL).

What change would you like to see made?

WE PROPOSE THAT THE GAS HOLDER SITE SHOULD BE DESIGNATED AS 'WHITE LAND' OR FOR OTHER HIGHER VALUE USES I.E. RESIDENTIAL AND RETAIL.

(PLEASE REFER TO COVER LETTER FOR MORE DETAIL).

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.