

## Proposed Aberdeen Local Development Plan 2015 Representation Form

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<b>Name</b>	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> <b>Roger Laird</b>
<b>Organisation</b>	<b>Archial Norr</b>
<b>On behalf of (if relevant)</b>	<b>BP Midstreams Pipelines</b>
<b>Address</b>	3 Bon Accord Crescent Aberdeen
<b>Postcode</b>	<b>AB11 6XH</b>
<b>Telephone</b>	<b>01224 586277</b>
<b>E-mail</b>	<b>rlaird@archialnorr.com</b>

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

<b>What document are you commenting on?</b>	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"/>	
<b>Policy/Site/Issue</b>	Policy B6 - Pipelines, Major Hazards and Explosive Storage Sites	<b>Paragraph(s)</b>	

**What would you like to say about the issue?**

Support the retention of this policy for the reasons set out in the attached report.

**What change would you like to see made?**

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Commercial  
Public Buildings  
Lifestyle  
Transport

# REPORT



Project Number: 9428  
Project Title: Proposed Aberdeen Local Development Plan  
Document Title: Representations on Behalf of BP Midstream Pipelines  
Date / Revision: 25<sup>th</sup> May 2015

## 1.0 Introduction

1.1 We act as agents for BP Midstream Pipelines and are employed to ensure that new development does not compromise the integrity of the Forties Pipeline which runs between Peterhead and Grangemouth, including a section which crosses the Aberdeen City local authority area. We would wish to make the following comments in relation to the proposed plan to achieve this aim.

## 2.0 Policy Background

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### Scottish Planning Policy (SPP)

2.2 SPP contains more specific policy advice in relation to the protection of oil and gas infrastructure. Under the section concerning business and employment, paragraph 99 states that development plans should identify any nationally important clusters of industries which handle hazardous substances within their areas, and safeguard them from development. This safeguarding should ensure the creation of appropriate separation distances between hazardous sites and new development.

2.3 Further more detailed guidance is included in paragraph 107 which states:

*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...*

2.4 SPP is therefore clear that development proposals should take cognisance of the presence of pipelines in their vicinity.

## 3.0 PADHI – HSE’s Land Use Planning Methodology

3.1 The PADHI land use regulations are a guide designed to assist planners and developers in determining likely responses from the HSE in the event that they are to be consulted on development proposals. The guide provides information on proposals which would be acceptable near potentially hazardous installations including pipelines.

3.2 The PADHI regulations identify 3 consultation zones which can be described as the inner zone, which is 110 metres from the pipeline; middle zone which lies 380 metres away; and the outer zone which lies 435 metres from the pipeline. Varying forms of development are permitted within each of these consultation zones.

## 4.0 Proposed Modifications to Proposed Plan

4.1 The proposed policy approach to pipelines and major hazards is supported. The wording of *Policy B6 - Pipelines, Major Hazards and Explosive Storage Sites* is considered to be appropriate and suitable for inclusion in the next version of the local development plan. The proposed wording, which requires consultation with the H.S.E and the pipeline operators is consistent with the approach which has been adopted by the Scottish Government Reporters and other local authorities along the route of the BP Forties Pipeline.

4.2 The proposed plan includes an illustration of the pipeline corridors on the constraints plan, and this is considered to be a worthwhile addition, to assist prospective developers when they are considering proposals. The inclusion of the pipeline corridors on the constraints map is supported.

4.3 A number of settlements contain allocations which are affected by the pipeline corridor. These are described below, together with suggested minor modifications to the plan.

### City Wide Proposals Map

4.4 The land to the north of Dyce Railway Station has been allocated under *Policy T1 – Land for Transport*. This policy safeguards the land for an expansion of Dyce Railway Station. Part of this site straddles the BP Forties Pipeline, and care will require to be taken in future development proposals. The PADHI regulations confirm that transport links, such as Dyce Station, when proposed within the inner consultation zone would result in an “advise against” response from the HSE. Whilst the proposed expansion of the station would not be ruled out by the presence of the pipeline, it is suggested that reference to this be included within policy T1 or the supporting text.

## OP23 – Dyce Drive

- 4.5 This site lies within the inner consultation zone of the Forties Pipeline, and this is noted in the “Other Factors” section of the allocation description. This reference to the pipeline is supported, on the basis that it will provide useful advice to developers of the site.

## OP34 – East Arnhall

- 4.6 This site lies on the edge of a commercial area in Aberdeenshire, and is allocated for employment land. This site falls within the middle consultation zone of the PADHI regulations, which therefore imposes a degree of constraint on the type of development which could proceed. Under the “Other Factors” section of the allocation description the presence of the pipeline is highlighted, and again this is supported for inclusion in the proposed plan.

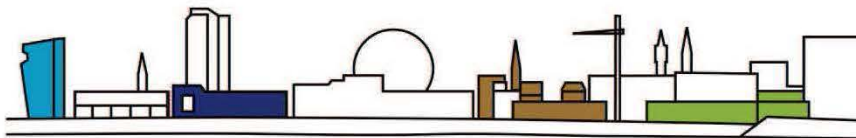
## OP44 – North Lasts Quarry

- 4.7 This quarry lies on the edge of the Forties Pipeline, and care therefore requires to be taken with any future development proposals. The reference to compliance with the pipeline policy within the “Other Factors” section is welcomed, however this refers to the B15 policy which is contained in the Aberdeen City Local Plan 2012. It is anticipated that this should be modified to refer to the new B6 policy. In any case inclusion of reference to the pipeline policy in relation to this site is supported.

## 5.0 Conclusion

- 5.1 This representation supports the retention of Policy B6, together with the illustration of the associated pipeline corridors on the constraints map.
- 5.2 A number of other minor amendments are also suggested in relation to a range of settlements along the route of the BP Forties pipeline, with a view to ensuring that its integrity is protected.





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<b>Policy/Site/Issue</b>	Policy T1 - Land for Transport	<b>Paragraph(s)</b>	

**What would you like to say about the issue?**

The land at Dyce Railway Station is within the pipeline consultation zone. This should be referred to in the policy. Please see the attached report for further information.

## What change would you like to see made?

Reference to presence of pipeline included in T1 policy in relation to Dyce Station. Please see attached report for further information.

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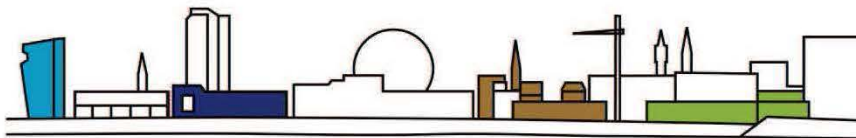
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<b>Policy/Site/Issue</b>	Policy OP23 - Dyce Drive	<b>Paragraph(s)</b>	

**What would you like to say about the issue?**

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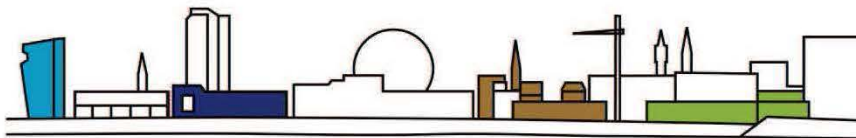
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Project Number: 9428  
Project Title: Proposed Aberdeen Local Development Plan  
Document Title: Representations on Behalf of BP Midstream Pipelines  
Date / Revision: 25<sup>th</sup> May 2015

## 1.0 Introduction

1.1 We act as agents for BP Midstream Pipelines and are employed to ensure that new development does not compromise the integrity of the Forties Pipeline which runs between Peterhead and Grangemouth, including a section which crosses the Aberdeen City local authority area. We would wish to make the following comments in relation to the proposed plan to achieve this aim.

## 2.0 Policy Background

### National Planning Framework 3

2.1 The National Planning Framework 3 provides the Scottish Government's long term strategy for the country, containing plans for the development and investment in infrastructure. Statutory development plans must have regard to the framework in their preparation, and the Scottish Ministers expect planning decisions to support its delivery. Paragraph 3.3 of the framework describes the importance of the oil and gas sector to the country, indicating that it forms the largest industrial sector, contributing an estimated £22 billion to Scotland's GDP in 2012. The industry employs 200 000 people nationally, by supporting the wider economy. The National Planning Framework therefore recognises the importance of the oil and gas sector to the country, and seeks to create the right conditions for it to flourish and grow.

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### Scottish Planning Policy (SPP)

2.2 SPP contains more specific policy advice in relation to the protection of oil and gas infrastructure. Under the section concerning business and employment, paragraph 99 states that development plans should identify any nationally important clusters of industries which handle hazardous substances within their areas, and safeguard them from development. This safeguarding should ensure the creation of appropriate separation distances between hazardous sites and new development.

2.3 Further more detailed guidance is included in paragraph 107 which states:

*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...*

2.4 SPP is therefore clear that development proposals should take cognisance of the presence of pipelines in their vicinity.

## 3.0 PADHI – HSE’s Land Use Planning Methodology

3.1 The PADHI land use regulations are a guide designed to assist planners and developers in determining likely responses from the HSE in the event that they are to be consulted on development proposals. The guide provides information on proposals which would be acceptable near potentially hazardous installations including pipelines.

3.2 The PADHI regulations identify 3 consultation zones which can be described as the inner zone, which is 110 metres from the pipeline; middle zone which lies 380 metres away; and the outer zone which lies 435 metres from the pipeline. Varying forms of development are permitted within each of these consultation zones.

## 4.0 Proposed Modifications to Proposed Plan

4.1 The proposed policy approach to pipelines and major hazards is supported. The wording of *Policy B6 - Pipelines, Major Hazards and Explosive Storage Sites* is considered to be appropriate and suitable for inclusion in the next version of the local development plan. The proposed wording, which requires consultation with the H.S.E and the pipeline operators is consistent with the approach which has been adopted by the Scottish Government Reporters and other local authorities along the route of the BP Forties Pipeline.

4.2 The proposed plan includes an illustration of the pipeline corridors on the constraints plan, and this is considered to be a worthwhile addition, to assist prospective developers when they are considering proposals. The inclusion of the pipeline corridors on the constraints map is supported.

4.3 A number of settlements contain allocations which are affected by the pipeline corridor. These are described below, together with suggested minor modifications to the plan.

### City Wide Proposals Map

4.4 The land to the north of Dyce Railway Station has been allocated under *Policy T1 – Land for Transport*. This policy safeguards the land for an expansion of Dyce Railway Station. Part of this site straddles the BP Forties Pipeline, and care will require to be taken in future development proposals. The PADHI regulations confirm that transport links, such as Dyce Station, when proposed within the inner consultation zone would result in an “advise against” response from the HSE. Whilst the proposed expansion of the station would not be ruled out by the presence of the pipeline, it is suggested that reference to this be included within policy T1 or the supporting text.

## OP23 – Dyce Drive

- 4.5 This site lies within the inner consultation zone of the Forties Pipeline, and this is noted in the “Other Factors” section of the allocation description. This reference to the pipeline is supported, on the basis that it will provide useful advice to developers of the site.

## OP34 – East Arnhall

- 4.6 This site lies on the edge of a commercial area in Aberdeenshire, and is allocated for employment land. This site falls within the middle consultation zone of the PADHI regulations, which therefore imposes a degree of constraint on the type of development which could proceed. Under the “Other Factors” section of the allocation description the presence of the pipeline is highlighted, and again this is supported for inclusion in the proposed plan.

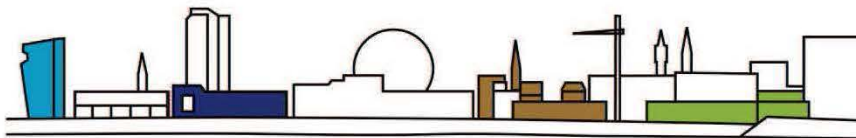
## OP44 – North Lasts Quarry

- 4.7 This quarry lies on the edge of the Forties Pipeline, and care therefore requires to be taken with any future development proposals. The reference to compliance with the pipeline policy within the “Other Factors” section is welcomed, however this refers to the B15 policy which is contained in the Aberdeen City Local Plan 2012. It is anticipated that this should be modified to refer to the new B6 policy. In any case inclusion of reference to the pipeline policy in relation to this site is supported.

## 5.0 Conclusion

- 5.1 This representation supports the retention of Policy B6, together with the illustration of the associated pipeline corridors on the constraints map.
- 5.2 A number of other minor amendments are also suggested in relation to a range of settlements along the route of the BP Forties pipeline, with a view to ensuring that its integrity is protected.





## 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 20<sup>th</sup> March and Monday 1<sup>st</sup> June 2015. Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

<b>Name</b>	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> <b>Roger Laird</b>
<b>Organisation</b>	<b>Archial Norr</b>
<b>On behalf of (if relevant)</b>	<b>BP Midstreams Pipelines</b>
<b>Address</b>	3 Bon Accord Crescent Aberdeen
<b>Postcode</b>	<b>AB11 6XH</b>
<b>Telephone</b>	<b>01224 586277</b>
<b>E-mail</b>	<b>rlaird@archialnorr.com</b>

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

<b>What document are you commenting on?</b>	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"/>	
<b>Policy/Site/Issue</b>	Policy OP44 - North Lasts Quarry	<b>Paragraph(s)</b>	

**What would you like to say about the issue?**

Support reference to the pipeline in the other factors section in relation to OP44.

**What change would you like to see made?**

Support reference to the pipeline in the other factors section in relation to OP44.

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](mailto: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 1<sup>st</sup> June.**

Thank you. For more information, please visit [www.aberdeencity.gov.uk/aldp2016](http://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.

Commercial  
Public Buildings  
Lifestyle  
Transport

# REPORT



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