

## 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.

Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Colin Lavety
Organisation	Barton Willmore
On behalf of (if relevant)	Aberdeen Harbour
Address	68/70 George Street, Edinburgh
Postcode	EH2 2LR
Telephone	0131 220 7777
E-mail	colin.lavety@bartonwillmore.co.uk

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	Policy B5 - Aberdeen Harbour	Paragraph(s)	3.69 - 3.72

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

Aberdeen Harbour Board welcome the continued recognition of the Harbour's role as an economic driver in the Aberdeen city region and support the inclusion of a dedicated section and policy in relation to safeguarding and supporting harbour operations.

Notwithstanding this, we have some suggested amendments to the wording of both Policy B5: Aberdeen Harbour and the preamble in paragraphs 3.69 – 3.72.

Paragraph 3.69, as presently worded, makes reference to the harbour's role in trade, offshore energy and passengers ferry services, in that order. We suggest that this be reworded to make reference to offshore energy first, to reflect the Harbour's role in the energy industry as being more prominent than that in trade.

Paragraph 3.70 makes reference to the Aberdeen Harbour Development Framework, stating that this explores how a greater mix of uses can be accommodated at the harbour. However, we would emphasise that the Development Framework, rather than seek to encourage mixed uses at the harbour, affords varying degrees of protection to Harbour operations dependent on the proximity of new development to the operational harbour.

The areas covered by Objective 1 of the development framework area identified to safeguard the harbour and the supply of existing industrial and business land.

Land at North Dee, Union Square and areas of Torry are subject to Objective 2 which acknowledges that mixed use development may come forward but is cognisant of the implications for amenity and therefore sets a number of caveats and parameters for such development to come forward.

The LDP should make reference to the 'Objective' areas of the Development Framework, the primary objective being the need to protect harbour and related industrial uses and the presumption against piecemeal development outwith the context of an approved masterplan which accords with the objectives of the Development Framework.

Policy B5, in its present wording, makes reference to the amenity of new development and maintenance of the operational efficiency of the harbour appearing to indirectly promote amenity of new development over harbour activity and safeguarding. This occurs partly through the ordering of these two objectives and also through the lack of emphasis of the essential nature of the harbour to maintaining and indeed growing the economic success of the region. It should be made clear that maintaining the viability of the harbour is of paramount importance and will take precedence over potentially conflicting developments.

We suggest that this reference should be reworded to make it clear that where new development is proposed in the vicinity of the harbour, due regard will be given to the objectives of the development framework which seeks foremost to maintain the operational efficiency of the harbour and also preserve the amenity of new development.

## What change would you like to see made?

Paragraphs 3.69 – 3.70 should be reworded to read:

“3.69 Aberdeen Harbour plays a critical role in the economy of Aberdeen and Scotland as a whole. It is Europe’s principal marine support centre for the offshore energy industry and a gateway for trade, linking with around 40 countries. It is also an important ferry port, providing lifeline services to Orkney and Shetland.

3.70 The existing Aberdeen Harbour area is subject to a Development Framework, the principal objective of which is to safeguard the harbour and the supply of existing industrial and business land but also explores how mixed uses can be delivered on the periphery of the harbour, without impacting on the operation of the port. It also examines options for creating better linkages between the harbour and the city centre.”

The second paragraph of Policy B5: Aberdeen Harbour should be reworded to read:

“Where new developments are proposed within the vicinity of the port, due regard will be given to the objectives of the Aberdeen Harbour Development Framework which seeks to maintain the operational efficiency of the harbour and preserve the amenity of new development.”

Please return the completed form by:

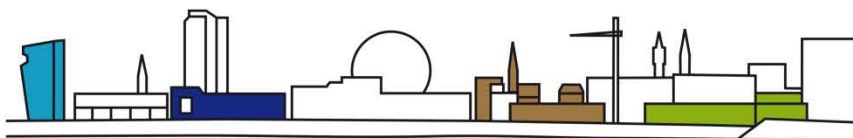
- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

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.



## 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>Colin Lavety</b>
<b>Organisation</b>	<b>Barton Willmore</b>
<b>On behalf of (if relevant)</b>	<b>Aberdeen Harbour</b>
<b>Address</b>	68/70 George Street, Edinburgh
<b>Postcode</b>	<b>EH2 2LR</b>
<b>Telephone</b>	<b>0131 220 7777</b>
<b>E-mail</b>	<b>colin.lavety@bartonwillmore.co.uk</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>	Proposals Map Aberdeen Harbour	<b>Paragraph(s)</b>	

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

Aberdeen Harbour's expansion at Nigg Bay is included in NPF3 as a National Development with an accompanying plan which shows an indicative extent of the proposed development. The boundary in NPF3 (Page 79) was taken from the Environmental Impact Assessment Scoping Report in 2013.

Aberdeen Harbour's response to the LDP MIR consultation in March 2014 included two potential options for the layout of the new harbour. It confirmed that these would continue to evolve and would be the subject of further discussion with Aberdeen City Council and other stakeholders.

Since that time the proposals have indeed evolved in the context of providing a clearer understanding of how the harbour might be built and will function. This has been a result of a range of factors, including more detailed hydrodynamic modelling, further consideration in relation to engineering constraints and discussions with customers and potential contractors.

The result is that the proposed footprint varies from that which was shown in NPF3 and in the PLDP.

The PLDP proposals map identifies two designations at Nigg Bay which relate directly to Harbour Expansion. These are Policy B5: Aberdeen Harbour which covers an area for operational harbour and Site OP62 which covers a wider area broadly in line with the NPF3 designation, albeit not including the Coast Road to the south.

Land covered by OP62 is also covered by other designations such as green belt, green space network and undeveloped coast.

While the extent of the OP62 designation is suitably broad so as to enable harbour construction, it is the area covered by designation B5 which we consider should be subject to further adjustment.

The accompanying Draft HRO Boundary Plan shows the most up to date site layout as well as a proposed boundary for a forthcoming application for a Harbour Revision Order under the Harbours Act 1964. This identifies the extent of the operational requirements of the Harbour. Land immediately outwith this boundary may be required on a temporary basis to enable harbour construction, but would not be required in perpetuity thereafter.

### Southern Breakwater

The first amendment since the NPF/MIR submissions relates to the alignment of the southern breakwater. This will now meet the headland at Greg Ness approximately 50m further south than was initially envisaged. The inclusion of this amendment will enable the breakwaters to function so as to achieve operational quayside in all parts of the harbour, even in very poor weather conditions. The PLDP as presently drafted does vary from NPF3 and shows sufficient land on the coast covered by Policy B5 so as to accommodate the realignment of the breakwater at this location and as such this is welcomed and supported.

### Headland at Greg Ness

The headland at Greg Ness is shown in the PLDP as being half covered by B5 and half by OP62. As a result of further consideration of the operational requirements for the new harbour, it is considered that an amendment to the B5 coverage at this location would be of benefit.

The headland will likely be used as a temporary construction and manufacturing area during the construction of the harbour. This will enable the construction and deployment of the concrete armour units which will make up the breakwaters. Thereafter, the headland would be reinstated, but with an access road retained to enable access for breakwater maintenance.

With the exception of a leading light on the headland and an additional area to avoid its obstruction as shown on the accompanying plan, it is not proposed that this area including the access road form part of the Harbour Revision Order nor part of the harbour's land ownership or permanent lease.

The Nigg Bay Development Framework is being progressed but Aberdeen Harbour, Scottish Enterprise and Aberdeen City Council. This comes as a direct requirement of the PLDP which states (Paragraph 3.72) that:

"A Development Framework will be prepared and adopted as Supplementary Guidance for the new harbour at Nigg Bay and its surrounding area. This will consider how to maximise the opportunities presented by investment in the new harbour, in terms of economic development, regeneration and environmental improvements. It will also address the co-ordination of essential infrastructure, and identify opportunities for strategic improvements to the road and rail network. Complementary Masterplans will then be prepared to provide further detail."

## What change would you like to see made?

It is submitted that the extent of the B5 allocation at Nigg Bay should be amended to reflect that shown on the accompanying draft HRO boundary plan.

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)

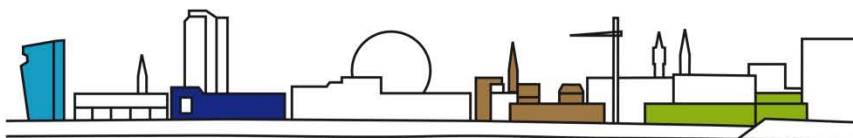
The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation 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.





## 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>Colin Lavety</b>
<b>Organisation</b>	<b>Barton Willmore</b>
<b>On behalf of (if relevant)</b>	<b>Aberdeen Harbour</b>
<b>Address</b>	68/70 George Street, Edinburgh
<b>Postcode</b>	<b>EH2 2LR</b>
<b>Telephone</b>	<b>0131 220 7777</b>
<b>E-mail</b>	<b>colin.lavety@bartonwillmore.co.uk</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>	Proposals Map - Coastal Management Areas	<b>Paragraph(s)</b>	

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

The Additional City Wide Proposals Map identifies areas along the coast as 'Developed Coastal Management Area' and 'Undeveloped Coastal Management Area', with these being denoted in the Legend as light green and dark green respectively.

These areas are subject to Policy NE7 – Coastal Planning which sets out criteria for considering applications for development, with the undeveloped coastal area being subject to more restrictive controls.

The map shows the same area covered by Policy B5 – Aberdeen Harbour, that being at the existing harbour and at Nigg Bay, as well as the coastal area from Footdee to the River Don as being 'undeveloped coast'. Land north of the River Don, the SSSI at Nigg Bay and all of the coast south of Nigg Bay are identified as being 'developed coast'.

As it stands, this implies that the heavily built up area in and around the existing harbour, the Opportunity Site for harbour expansion at Nigg Bay and the coast up to Bridge of Don would be subject to more restrictive planning policy than the more remote coastal areas (which are also subject to LNCS, LNR and SSSI policies amongst others).

It therefore appears that the colours shown in the Legend of the Additional City Wide Proposals Map for both 'Developed Coastal Management Area' and 'Undeveloped Coastal Management Areas' have been drafted incorrectly and have been reversed. These should be denoted in the Legend as dark green and light green respectively.

## What change would you like to see made?

The Legend on the Additional City Wide Proposals Map should be amended to reverse the colours used to indicate areas of 'Developed Coastal Management Area' and 'Undeveloped Coastal Management Areas'. These should be denoted in the Legend as dark green and light green respectively.

Please return the completed form by:

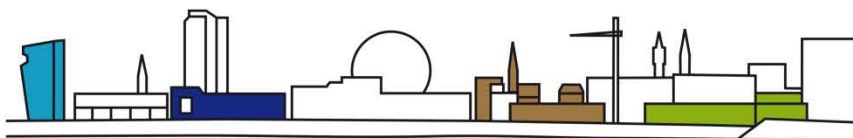
- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

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.



## 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>Colin Lavety</b>
<b>Organisation</b>	<b>Barton Willmore</b>
<b>On behalf of (if relevant)</b>	<b>Aberdeen Harbour</b>
<b>Address</b>	68/70 George Street, Edinburgh
<b>Postcode</b>	<b>EH2 2LR</b>
<b>Telephone</b>	<b>0131 220 7777</b>
<b>E-mail</b>	<b>colin.lavety@bartonwillmore.co.uk</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>	Proposals Map - Core Path Network	<b>Paragraph(s)</b>	

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

As referred to in our representations on the Proposals Map in relation to Aberdeen Harbour's expansion at Nigg Bay, since the time of our representations on the LDP MIR, the proposed site layout and arrangements have evolved to a state that is now fully representative of the extent of land take required for the new harbour. This has included the need for additional land at St Fitticks where a new site access would be taken.

The Proposals Map on the PLDP shows the current route of the Coastal Path which forms part of the Core Path Network. This presently follows the Coast Road at the western edge of the Nigg Bay site to the point where it meets St Fitticks Road and Greyhope Road, where it splits and follows each of these roads.

The accompanying draft Harbour Revision Order Plan shows the proposed site layout alongside a draft boundary for a forthcoming application for a Harbour Revision Order under the Harbours Act 1964. If approved, the land within this boundary would form part of the operational harbour and would not be accessible to the public. As such, the core paths will require to be diverted around the operational area of the harbour, both during construction and thereafter.

Our representation on the extent of the B5 designation at Nigg Bay on the Proposals Map submits that this should be extended to encompass the proposed operational area of the harbour. It follows that the Core Path designations should also be amended to reflect the extent of the new harbour and that the Core Path Network will require to be diverted so as not to cross land which will be inaccessible to the public.

SPP states (Paragraph 228) that Local Development Plans should safeguard access rights and core paths, and encourage new and enhanced opportunities for access linked to wider networks. This would imply that if left unamended then the path network shown in the PLDP is safeguarded, despite the likelihood of this ultimately being diverted as a result of the delivery of the new harbour. As such we consider it imperative that this be rectified prior to adoption of the LDP.

The precise route of the temporary and subsequently permanent rerouting of the paths at Nigg Bay will be established through a forthcoming masterplanning exercise following approval of the Nigg Bay Development Framework. However, it is anticipated that this will follow the edge of the proposed harbour and the realigned road network at this location and, at the scale shown in the LDP Proposals Map, this would represent an appropriate amendment to the plan.

As such it is submitted that the Core Path Network at Nigg Bay should be amended to reflect the proposed harbour layout.

## What change would you like to see made?

The Proposals Map should be amended to show the Core Path Network at Nigg Bay being outwith the area proposed as operational harbour as per our accompanying draft HRO Boundary Plan and as per our representations on the extent of Policy B5 on the Proposals Map at Nigg Bay.

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)

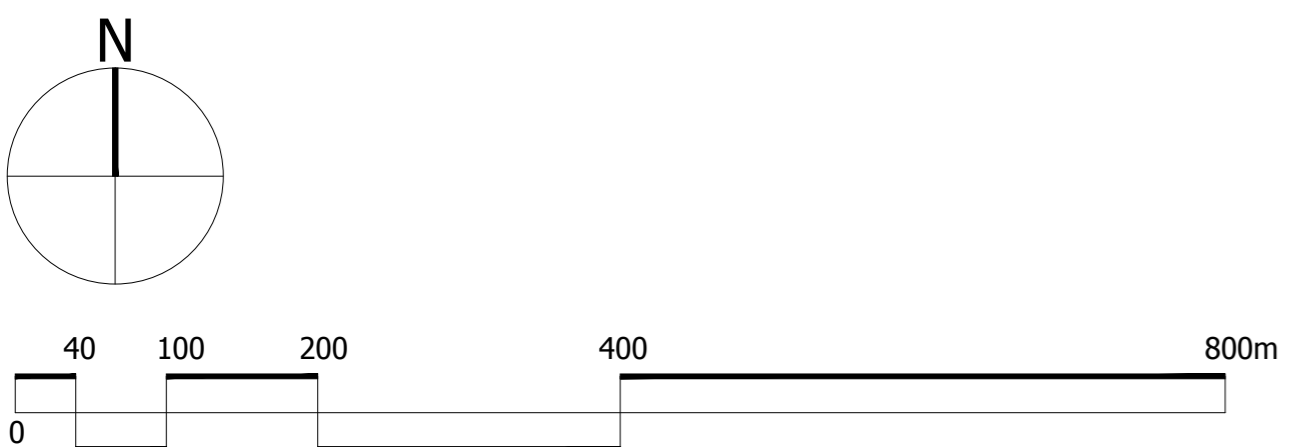
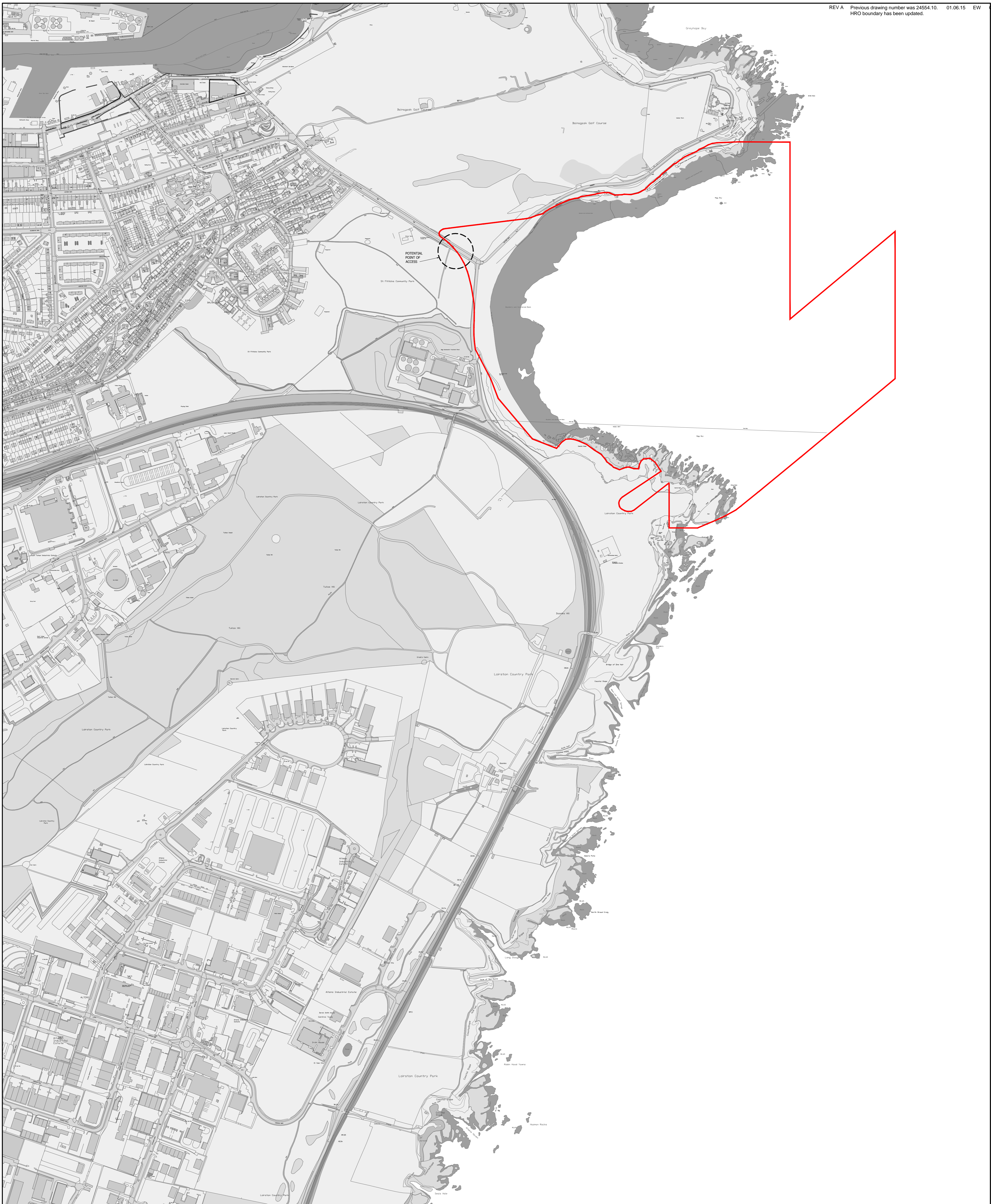
The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation 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.





 Harbour Revision Order Boundary  
 approximately 87 hectares

Project  
**Nigg Bay**  
**Aberdeen**  
 Drawing Title  
**Harbour Revision Order**  
**Boundary Plan**  
 Date: 24.04.15 Scale: 1:5,000@A1 Drawn by: EW Check by: GT  
 Project No: 24554 Drawing No: 02 Revision: A