

## Proposed Aberdeen Local Development Plan 2015 Representation Form

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**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"/> Dennis Pope
Organisation	Nathaniel Lichfield & Partners
On behalf of (if relevant)	On behalf of British Airways
Address	14 Regents Wharf All Saints Street London
Postcode	N1 9RL
Telephone	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
E-mail	<div style="background-color: black; width: 100%; height: 1.2em;"></div>

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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 B1 Business and Industrial Land	Paragraph(s)

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

BA notes that a significant quantum of land surrounding Aberdeen Airport has been allocated for the retention of Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types.

Whilst BA is supportive of these allocations in principle this is subject to the caveats identified above in our comments on policy LRC1 relating to the constraints that airport operations impose on new development. BA also supports the need to safeguard the supply of existing industrial and business land throughout the City from other development pressures. This is particularly important for sites in strategic locations and those with good accessibility to Aberdeen Airport.

The safeguarding of this surrounding land for business use will continue to support and promote the growth of the Aberdeen Airport helping it in turn to meet its economic development objectives.

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

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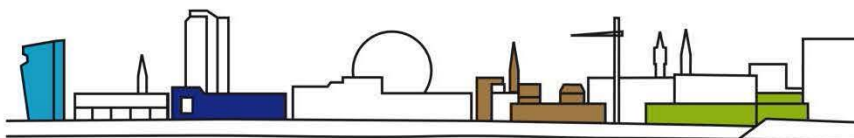
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<b>Policy/Site/Issue</b>	Policy B2 Specialist Employment Areas	<b>Paragraph(s)</b>	

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

BA supports in principle the allocation of Opportunity Site 19 (OP19) for development of the Aberdeen Exhibition and Conference Centre and complementary employment uses.

However, part of the OP19 site falls within the Aberdeen Airport Public Safety Zone. Any future development within this zone must fully comply with the guidance set out within the 'Control of Development within Public Safety Zones' Circular 08/2002.

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



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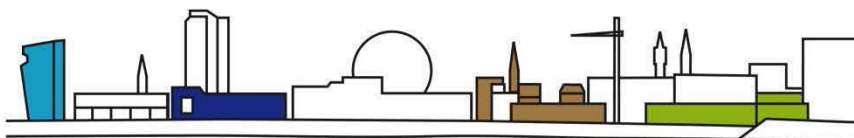
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<b>Policy/Site/Issue</b>	Policy B4 Aberdeen Airport	<b>Paragraph(s)</b>	

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

BA supports the presumption in favour of compatible uses which are required for the effective and efficient operation of the Airport and which have a functional requirement to be located within the area zoned for Aberdeen Airport (on the Local Development Plan Proposals Map). It is noted that this includes administrative offices, warehousing, distribution facilities and carparks whilst other airport-related uses such as hotels and car hire facilities will be treated on their merits. The latter uses often have an important role to play in supporting Airports and hence BA would suggest that there should also be a presumption in favour of encouraging these uses.

BA also supports the inclusion of Public Safety Zones (PSZs) on the Proposals Map. However as stated above any future development within this zone must fully comply with the guidance set out within the 'Control of Development within Public Safety Zones' Circular 08/2002. Hence, the Council should not permit any types of development within these areas which result in an increase of people living, working or congregating in these zones.

BA supports the provision within this policy to protect the safe operation of the Airport. Any future development neighbouring the Airport must be fully assessed in terms of the continual safe operation of the airport including assessing the height of buildings, external lighting, landscaping, bird hazard management and impact on communication and navigation equipment.

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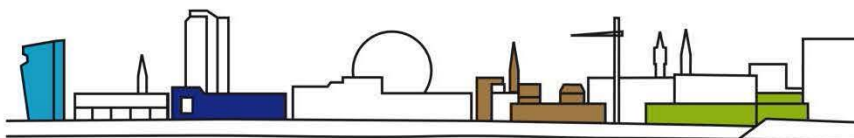
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<b>Policy/Site/Issue</b>	Policy D3- Big Buildings and Big Building Supplementary Planning Guidance (SPD)	<b>Paragraph(s)</b>	

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

BA supports the clarification within Policy D3 that this policy does not apply to employment land and industrial areas.

BA also supports the need for Big Buildings to comply with Civil Aviation Authority requirements. Although this is set out in the SPD it would be helpful if this requirement was also reflected in Policy D3 as well as it is important to consider the need for aviation safety in bringing forward taller buildings.

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



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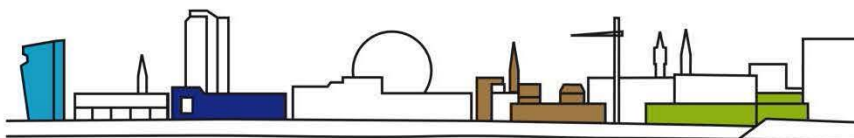
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<b>Policy/Site/Issue</b>	Policy H1: Residential Areas	<b>Paragraph(s)</b>	

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

The Proposals Map identifies residential areas (H1) as surrounding Aberdeen Airport.

BA recognises the need in the allocation of new residential sites to ensure that these should be in locations least affected by the operation of Aberdeen Airport. A number of Opportunity Sites for housing and mixed use are in close proximity to the airport are listed within the Consultation Document. Namely OP14, OP15, OP17, and OP20.

If residential use is to be permitted on these sites the Council must need to satisfy themselves this use is compliant with other policies with the plan relating to the safe and effective operation of Aberdeen Airport as it is important that the role of the Airport and its expansion is not prejudiced by proposed land allocations nearby.

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

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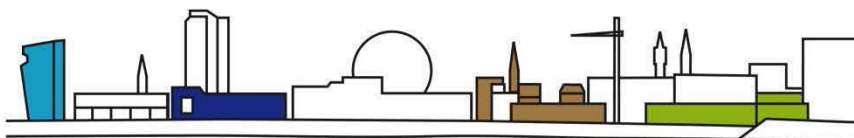
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<b>Policy/Site/Issue</b>	Policy I1 Infrastructure Delivery and Planning Obligations	<b>Paragraph(s)</b>	

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

BA makes an important contribution to the local, regional and national economy as well as providing worldwide connections which are important for both national and local businesses.

It is important to BA in order to operate effectively that (1) planning policy in Aberdeen does not unduly restrict BA's operations or capacity at Aberdeen Airport but enables this operator to develop its operations to meet demand and (2) where infrastructure is needed to support the Airport that there is an appropriate mechanism to bring this forward.

BA thus supports the general principle within this policy that appropriate contributions will be sought by the Council from developers for infrastructure improvements based upon the scale and type of development proposed.



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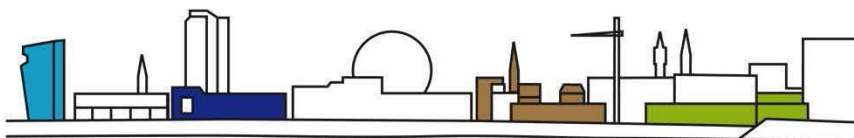
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<b>Policy/Site/Issue</b>	Spatial Strategy – Policy LR1	<b>Paragraph(s)</b>	

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

It is noted that NPF3 identifies a number of developments considered essential to the delivery of the Aberdeen spatial strategy including improvements to Aberdeen Airport.

In order to safeguard and build upon the future role of the Airport, consistent with this NPF3 objective, it is important that any land use allocations, and any proposed development that comes forward within these allocations, should have appropriate and proper regard to airport operations.

## What change would you like to see made?

BA believes that the preamble text to policy LR1 should provide explicit guidance to developers at the outset in relation to the constraints that airport operations impose upon development. Hence the following factors should be identified as relevant in relation to considering any future development within the proposed land use allocations:

- Relevant noise standards, in particular for residential uses, will need to be fully complied with;
- Full compliance will also be required in relation to the defined regeneration Airport Safeguarding Areas; and
- Full regard will need to be given to the guidance within the 'Control of Development within Public Safety Zones' Circular 08/2002 – this is of particular relevance to the OP19 employment land allocation and potentially to the OP14 residential allocation a shown on the draft Proposals Map.

In order to deliver forward the proposed allocations in a timely way, and avoid the need for objections from the airport operator and BA, these constraints need to be identified in policy at the outset so that they are fully understood by developers.

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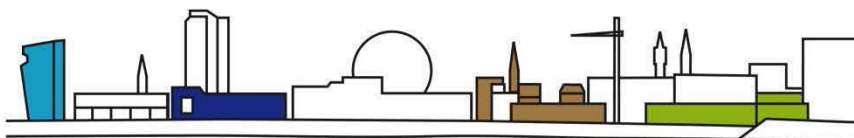
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	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
<b>Policy/Site/Issue</b>	Policy T1 Land for Transport	<b>Paragraph(s)</b>	



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

BA recognises that good transport connections are essential to the economic prosperity of Aberdeen and the quality of life of people living and working in the City.

BA thus supports the inclusion of Policy T1: Land for Transport to safeguard land for transport projects, specifically A96 Park and Ride (OP24), Dyce Railway Station (OP86) and the Aberdeen Western Peripheral Route which propose transport infrastructure which will improve connectivity to Aberdeen Airport.

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

Please return the completed form by:

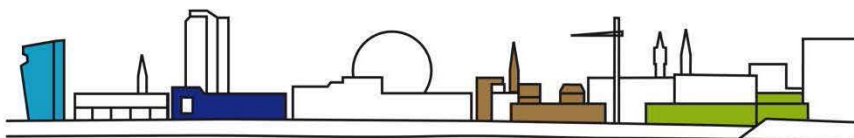
- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
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Thank you. For more information, please visit [www.aberdeencity.gov.uk/aldp2016](http://www.aberdeencity.gov.uk/aldp2016) or to contact the Local Development Plan Team call 01224 523470.

#### **Data Protection Statement**

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## 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>Dennis Pope</b>
<b>Organisation</b>	<b>Nathaniel Lichfield &amp; Partners</b>
<b>On behalf of (if relevant)</b>	<b>On behalf of British Airways</b>
<b>Address</b>	14 Regents Wharf All Saints Street London
<b>Postcode</b>	<b>N1 9RL</b>
<b>Telephone</b>	[REDACTED]
<b>E-mail</b>	[REDACTED]

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 T2 Managing the Transport Impact of Development and Policy T3 Sustainable and Active Travel	<b>Paragraph(s)</b>	

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

BA supports the need for new development to demonstrate that sufficient measures have been taken to minimise traffic generation and to maximise opportunities for sustainable and active travel.

BA also supports the need to manage traffic generation throughout the Borough but notes that in line with NPF3 objective of building upon the future role of the Airport this should not be at the expense of (1) encouraging the expansion of Aberdeen Airport; (2) restricting those travelling to the airport by car or (3) restricting car parking capacity at the airport.

It is important to BA that journeys to Aberdeen Airport continue to be made as efficiently as possible and the Airport is readily accessible to all modes of travel.

Consistent with BA's comments on T2 above BA supports the recognition within Policy T3 that there will still be instances in which people will require to travel by car in particular in order to access the Airport.

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

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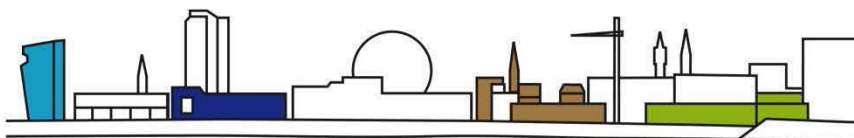
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<b>Policy/Site/Issue</b>	Policy T5 Noise and Noise Supplementary Planning Guidance (para 7.3.3)	<b>Paragraph(s)</b>	

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

BA supports the requirement within Policy T5 that housing, and other noise sensitive developments, will not normally be permitted close to existing noisy land uses without significant mitigation measures in place to reduce the impact of noise.

BA also supports the presumption against the development of sites within the Leq 57dB contour for residential purposes as set out in the Noise Supplementary Planning Guidance (para 7.3.3).

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

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