

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 checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Fraser Littlejohn
Organisation	Montagu Evans LLP
On behalf of (if relevant)	Buccmoor LP
Address	4th Floor Exchange Tower 19 Canning Street Edinburgh
Postcode	EH3 8EG
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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	Policies B1 and B2, Supporting Business & Industrial Development, Aberdeen Energy Park (and site OP3)	Paragraph(s)	3.55 - 3.62

What would you like to say about the issue?

We act on behalf of Buccmoor LP, a joint venture who control Aberdeen Energy Park and Aberdeen Innovation Park, and write with reference to the preparation of the new Local Development Plan (LDP). On behalf of our clients we submit the following representations to the Local Development Plan.

Montagu Evans LLP were agents and planning advisors in support of the recent application for planning permission in principle, to extend the existing Aberdeen Energy Park to provide 48,000 sqm of office / industrial / warehouse.

The Aberdeen Energy and Innovation Parks are home to a range of companies, from start up businesses to global head-quarters. The Parks were established by Scottish Enterprise and have grown over the last two decades, with investment in high quality infrastructure and new development across both sites, creating not only mature parkland campuses but also facilitating the growth of many successful companies. It was a measure of this success which resulted in the decision to extend Aberdeen Energy Park.

The strategy of the new owners of the Energy Park is to invest in infrastructure and to open up the expansion land at the Energy Park (OP3 Findlay Farm), as well as undertake office and industrial development.

As the Council are aware planning permission in principle for the extension to Aberdeen Energy Park, to allow for the development of both Class 4, 5 and a proportion of Class 6 uses, was approved by the Council on 7 November 2014 (application reference P131483).

The application was granted subject to a number of conditions, including in relation to the development of ancillary Class 6 uses.

In light of the granting of the planning permission in principle and reflecting the Council's approach elsewhere across the City, it is considered that the forthcoming Proposed Plan should replace the Specialist Employment Area designation across Aberdeen Energy Park (including site OP 3 which benefits from the consent) with the wider Business and Industry designation (B1).

In order for the offer at the Energy Park to be able to be marketable with competing sites in the area flexibility is needed in terms of the range and quantum of uses permissible on the park. The wording of Policy B2 Specialist Employment Areas does not give that degree of flexibility and is now in conflict with the recently granted consent for the extension to the energy park which allows Class 4, 5 and 6 uses with no restriction on Class 5 industrial use.

The existing specialist employment allocation is considered to be outdated. Its original purpose is now out of kilter with the actual and pressing requirements of the market which whilst seeking to develop in high amenity locations require flexibility across Classes 4, 5 and 6.

There continues to be significant market interest in occupying space across the energy park. The quantum and cluster of development in this part of the city is particularly attractive to developers. This interest is for high amenity requirements and as previously discussed with the Council in the context of the planning application that market interest is in Class 5 and 6 uses. This market interest must be reflected in allocations so as not to undermine the plan.

It is of particular note that Aberdeen Innovation Park, in close proximity to the Energy Park, retains its specialist employment allocation and high quality and high amenity opportunities continue to exist for further development and investment here to accommodate any purely research and development interest. Given this supply of land for purely research and development uses it is considered that any change in allocation of the Energy Park will not undermine any such investment opportunities.

The Strategic Development Plan's objectives in relation to encouraging economic growth are of particular relevance to Aberdeen Energy Park.

PLEASE REFER TO ATTACHED CONTINUATION SHEET

What change would you like to see made?

In light of the granting of the planning permission in principle noted above references in the Proposed Plan should be updated to reflect entirely the nature of the Class 4, 5 and 6 consent.

In light of the planning permission in principle Aberdeen Energy Park, including OP 3, should be reallocated as Business and Industry (B1), including to reflect neighbouring designations.

This change would reflect exactly the Council's latest position on similar designations at Dyce Drive.

The need for this flexibility, in particular to address the specific property requirements of the energy industry who often require to have Class 4, 5 and 6 uses located together on the same site, has been recognized elsewhere in the proposed Local Development Plan with the business park element of Opportunity Site OP23 at Dyce Drive being taken out of the specialist employment zoning (BI2) in the current Local Development Plan and changed to Policy B1 Business and Industrial Land in the proposed plan.

In these respects the Main Issues Report acknowledges that the "BI2 Specialist Employment land now has planning permission for Class 5 and 6 uses as well as Class 4." It continues that "we [the Council] therefore propose to rezone the BI2 land at Dyce Drive to BI1 [now B1]."

As previously noted our clients are keen that the nature of the planning permission in principle, in this and in other respects, are now reflected in the emerging Local Development Plan. Such a move will in no way preclude research and development companies locating at Aberdeen Energy Park but would allow for maximum flexibility in incorporating interest. The change, it is considered, is entirely consistent with the thrust of the development plan.

As noted above Aberdeen Innovation Park, in close proximity to the Energy Park, retains its specialist employment allocation and high quality and high amenity opportunities continue to exist for further development and investment here to accommodate purely research and development interest. Given this supply of land for purely research and development uses it is considered that any change in allocation of the Energy Park will not undermine any such investment opportunities.

We trust that the above and attached will be given due regard in the process to prepare the Proposed Plan.

Our clients take a keen interest in development planning issues and would be keen to be kept advised of the progress of the process to prepare the new Local Development Plan.

We would of course be pleased to discuss matters further with the Council if that would assist. Should you require any further information at this stage, however, please do not hesitate to contact Andrew Munnis or Fraser Littlejohn of this office direct.

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AEP

**Montagu Evans LLP on behalf of Buccmoor LP
CONTINUATION SHEET 1 OF 1**

The Aberdeen Local Development Plan 2012

The LDP continues to note that significant land allocations have been made to the area north of the River Don to support the Energetica Corridor concept promoted by Aberdeen City and Shire Economic Future. The Plan allocates sites for more than 7,000 homes in this area and 32 ha of employment land (in addition to more than 75 ha of land already zoned within the 2008 Aberdeen City Local Plan).

Appendix 2 of the LDP refers to a number of Opportunity Sites, including site reference OP3 – land at Finlay Farm, Murcar. The site is some 16.4 ha, and it is noted as a Specialist Employment Area and an opportunity to extend the Aberdeen Science and Energy Park.

Policy LR1 - Land Release Policy

The energy park extension has been zoned under this policy for 16.4ha of specialist employment land and as an opportunity to extend the Aberdeen Science and Energy Park. The site was similarly identified in the 2008 Local Development Plan and is considered to be suitable for commencement immediately.

The LDP refers to Specialist Employment Areas as a means of maintaining and promoting a strong and diverse economy. The LDP refers to two specialist technology parks [Aberdeen Energy and Innovation Parks], within the Bridge of Don area, as forming an essential component of Scottish Enterprise's Economic Development Strategy.

Policy B12 – Specialist Employment Area

The policy notes that:-

"In areas that are identified as Specialist Employment Areas on the Proposals Map, only Class 4 Business uses shall be permitted. The exception being, proposals at the Aberdeen Science and Energy Park for a mix of Class 4 Business and Class 5 General Industrial which will be considered on their merits.

Activities associated with research, design and development of new or existing technologies, products, processes or services of a high technology nature, together with related educational/training facilities are encouraged in these areas.

Ancillary facilities aimed primarily at meeting the needs of businesses and employees within the business and industrial area may be permitted where they enhance the attraction and sustainability of the specialist employment area for business investment.

The Aberdeen Exhibition and Conference Centre is reserved for exhibition centre purposes and uses compatible with the exhibition centre and the park & ride facility."

The now consented scheme includes for Classes 4, 5 and a proportion of Class 6.

The consented uses better reflect the market demand, and consequently should be reflected in the emerging policy position.

Aberdeen City and Shire Strategic Development Plan

The March 2014 Strategic Development Plan (SDP) post dates the preparation of the 2012 Local Development Plan. Clearly the emerging LDP requires to reflect the SDP.

Emerson Facility at D2 Business Park, Dyce

Class 4 – 56%
Class 5 – 24%
Class 6 – 20%

BP Facility at D2 Business Park, Dyce

Class 4 – 2%
Class 5 – 10%
Class 6 – 88%

Tetra Facility, Aberdeen Gateway Business Park at Cove

Class 4 – 33%
Class 5 – 50%
Class 6 – 17%

Total Facility, Aberdeen Gateway Business Park at Cove

Class 4 – 9%
Class 5 – 18%
Class 6 – 73%

Schlumberger Facility at Badentoy North

Class 4 – 2%
Class 5 – 7%
Class 6 – 91%

Ptarmagan Facility, Drumoak

Class 4 – 17%
Class 5 – 9%
Class 6 – 74%

OilStates Facility, Aberdeen Gateway

Class 4 – 17%
Class 5 – 0%
Class 6 – 83%

These developments it is submitted are representative of the Aberdeen market and of the average enquiry for Aberdeen Energy Park. Each have in the range of 20% - 70 % Class 6 floorspace. Such occupiers are attracted by the location of Aberdeen Energy Park, the existing quantum of development in the locale and indeed the existing and proposed high amenity nature of the scheme.

Without such flexibility, Aberdeen Energy Park will not be able to respond to the true market requirements to the detriment of inward economic development to the City. Only sites such as the Energy Park have the capability of accommodating the occupier interest.

Of the three main requirements across the City and Shire, detailed below, none could presently be accommodated on Aberdeen Energy Park. Please note that occupier details have been redacted in commercial confidence, but can be provided to the Council. Figures are in square feet.

Occupier 1

Warehouse / Works – 9,000 (4,000 storage)
Yard – 43,000

Class 6 = 90%

Occupier 2

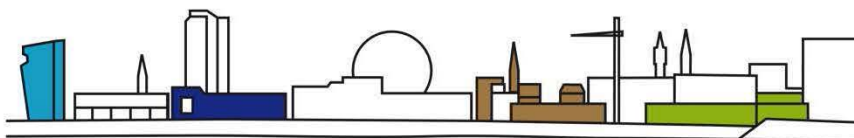
Warehouse/Workshop – 50,000 (20,000 storage)
Yard – 50,000

Class 6 = 70%

Occupier 3

Warehouse/Workshop – 150,000 (40,000 storage)
Yard – 130,000

Class 6 = 60%



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As the Council are aware planning permission in principle for the extension to Aberdeen Energy Park, to allow for the development of both Class 4, 5 and 6 uses, was approved by the Council's Planning Development Management Committee on 6 November 2014 (application reference P131483).

The application was granted subject to a number of conditions, including in relation to the development of ancillary Class 6 uses.

Buccmoor LP, a joint venture, now control Aberdeen Energy Park.

The strategy of the new owners of the Energy Park is to invest in infrastructure and to open up the expansion land at the Energy Park (OP3 Findlay Farm), as well as undertake office and industrial development.

References to the park at paragraph 3.62, whereby it is stated that "The parks are an essential component of Scottish Enterprise's Economic Development Strategy" are now not accurate, do not reflect the current situation and should be removed.

We understand that Scottish Enterprise themselves will be making representations to the Council to this effect themselves.

In addition and to reflect the branding at the park and the nature of the market interest for the extension, references should be updated throughout the Proposed Plan to the site being known as Aberdeen Energy Park.

What change would you like to see made?

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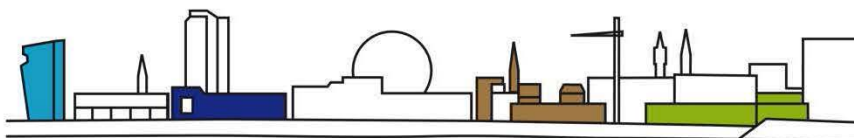
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The application was granted subject to a number of conditions, including in relation to the development of ancillary Class 6 uses.

We note that policy B1 and B2 states that "facilities that directly support business uses may be permitted where they enhance the attraction and sustainability" of such areas.

In light of alternative uses now being envisaged however (including the potential for residential development at the exhibition centre (OP13)) greater flexibility should be introduced to policy such that any appropriate proposals for alternative uses on sites identified for Business and Industry be considered on their own merits.

What change would you like to see made?

It is submitted that in light of alternative uses now being envisaged (including the potential for residential development at the exhibition centre (OP13)) flexibility should be introduced to policy such that any appropriate proposals for alternative uses on sites identified for Business and Industry be considered on their own merits.

As previously noted our clients are keen that the nature of the planning permission in principle, in this and in other respects, are now reflected in the emerging Local Development Plan.

We trust that the above and attached will be given due regard in the process to prepare the Proposed Plan.

Our clients take a keen interest in development planning issues and would be keen to be kept advised of the progress of the process to prepare the new Local Development Plan.

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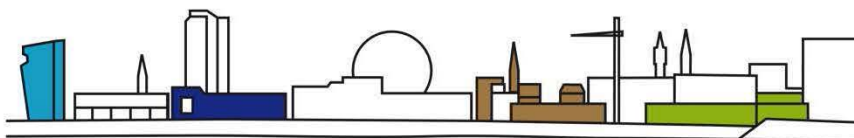
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Policy/Site/Issue	OP13, AECC Bridge of Don (Policy R 4)	Paragraph(s)	N/A

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The application was granted subject to a number of conditions, including in relation to the development of ancillary Class 6 uses.

Whilst we support the principle of the alternative uses being on sites identified for Business and Industry be considered on their own merits (including the potential for residential development at the exhibition centre (OP13)) our client has strong reservations in respect of the inclusion within supporting text to reference to the site incorporating a household waste recycling centre (HWRC) to replace the facility at Scotstown Road.

There seems to be limited reference to the potential amenity impacts of the inclusion of such a facility at the site in the context of the Aberdeen Local Development Plan SEA Environmental Report (Proposed Plan).

We note that the current 2012 LDP identifies a site at Denmore Road for this facility but it has not been delivered. Consequently the Council intend to delete this site.

In assessing Issue 26 of the Main Issues Report, in respect of Waste, we note the Council's following response:-

"The Council wish to ensure that these facilities work well and are fit-for-purpose and the comments are welcomed. New household waste recycling facilities are far better managed, larger and offer a wider range for recycling than old ones. The new facility at Grove Nursery is an example of a modern high quality facility which will be replicated at the AECC site at Bridge of Don. We agree that underground storage of waste and recycling material has advantages and this will be promoted in Supplementary Guidance."

The Planning authority action/recommendation for Proposed Plan are noted as follows:-

- Expand Altens East/Doonies OP site to accommodate a material recycling facility, RDF Plant and collection depot.
- Identify East Tullos Gas Holder and HWRC site for an energy from waste facility.
- Identify the AECC site at Bridge of Don for a HWRC.
- Update detailed policy and supplementary guidance wording to accommodate underground storage of waste and recycling materials.

PLEASE REFER TO ATTACHED CONTINUATION SHEET

What change would you like to see made?

Given that the Council have failed to qualify the nature and extent of the use, and consequently that no assessment can be made on the appropriateness of the use on the surrounding area, including high amenity business sites, it is submitted that the Council should consider removing references to the OP13 site being appropriate for a household waste recycling centre to replace the facility at Scotstown Road or at least make more obvious and explicit reference at policy R4 / OP13 to the nature and appropriateness of any such uses across the site being determined / guided by the Development Framework. This process may determine that other sites are more appropriate for any such development.

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OP13

**Montagu Evans LLP on behalf of Buccmoor LP
CONTINUATION SHEET 1 OF 1**

The Proposed Plan in no way seeks to qualify the nature of the waste recycling centre, its scale, nor indeed any environmental effect potentially prejudicing and undermining the significant investment on nearby high amenity business and industrial development sites.

Our clients have significant concern that the uses proposed at the site will significantly affect their interests, counter to the policies of the extant and emerging planning policy position.

SEPA regulatory guidance on the preparation of Working Plans (October 2011) notes that, in relation to Pollution Control there is a requirement to detail the measures to be taken to monitor and/or control the following:-

- a) Vermin
- b) Insects
- c) Noise
- d) Dust
- e) Spillages
- f) Odours
- g) Mud
- h) Litter
- i) Fires

Whilst statements in this respect will likely be made within any planning application submission, it is not considered appropriate to allocate a site for such if there has been no such assessment.

Whilst the OP13 site could be considered located within an existing commercial area, Council policies in this respect impact upon neighbouring areas which also seek to encourage inwards and economic development.

The potential impact on the existing business and industry allocations and the wider business community could be adversely affected, with associated potential impact on economic development.