

our ref: **BF/Q30195**
your ref:
email:
date: 14 June 2013



Development Plan Team
Aberdeen City Council
Business Hub 4
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By Email: ldp@aberdeencity.gov.uk

Dear Sir,

PRE-MAIN ISSUES REPORT CONSULTATION
ABERDEEN GAS HOLDER STATION
REPRESENTATIONS ON BEHALF OF SCOTIA GAS NETWORKS

We are instructed by Scotia Gas Networks (SGN) to submit representations to the Pre-Main Issues Report Consultation 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 on Friday 14th June 2013. 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.

The site comprises a large mothballed gas holder, associated structures and hard standing. SGN have identified potential for the gas holder to be decommissioned and as such the alternative future use of the site should be considered within the next Aberdeen Local Development Plan (2016).

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.

b) Current adopted Aberdeen Local Development Plan and Proposals Map

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.



Adopted Aberdeen Local Plan Proposals Map Extract (February 2012)

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.



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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.

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.

Yours sincerely,

Ben Ford
Director