

# Response ID ANON-B3JU-DSTF-5

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**

Submitted on **2019-05-13 13:45:51**

## About You

### What is your name?

**Name:**

Steve Iannarelli

### What is your organisation?

**Organisation:**

Barton Willmore

**On behalf of:**

Aberdeen Harbour Board

### How can we contact you?

**Email:**

[REDACTED]

**Telephone:**

[REDACTED]

**Address:**

[REDACTED]

[REDACTED]

[REDACTED]

## 1 Introduction

**Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?**

**Do you have any comments in relation to this section?:**

## 2 Settlement Strategy

### Question 1 New Housing Sites

**Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:**

### Question 2 Housing Allowances Beyond 2032

**Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:**

### Question 3 Brownfield and other Opportunity Sites

**Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:**

AHB agree that there are multiple opportunity sites within Aberdeen that are suitable for redevelopment. AHB therefore contend that ACC's strategy to avoid future allocation of any further employment land within Aberdeen within the forthcoming LDP 2022 should be reconsidered and various sites should be allocated within the LDP 2022 Proposed Plan as follows:

- Development sites/interventions areas within the Bay of Nigg Development Framework (Years 0-15)
- Land around South Harbour Opportunity Site (LDP Reference: OP62) which includes temporary construction areas associated with South Harbour at St Fitticks, Girdleness and Gregness.
- Areas of search nominated as Areas 1 and 2 within AHB's 'Benefiting From Growth' document (attached) which seek to encourage potential redevelopment of land for harbour and employment related uses on either side of Coast Road, land north of Doonies Farm and land within Altens and East Tullos industrial estates.

South Harbour:

In line with our response above, we recommend that a new and/or extended Opportunity Site allocation should be created around the existing Opportunity Site OP 62 to facilitate the wider expansion of South Harbour into St Fitticks, Girdleness, Gregness, Coast Road and land North of Doonies Farm with infrastructure improvements to enhance connectivity to Altens and East Tullos industrial areas.

Such sites should be allocated within the LDP 2022 as 'Opportunity Sites', harbour-related use (under LDP Policy B5) or as allocated employment sites. We suggest that this strategy will be an important mechanism to provide the level of support required to guide the strategic redevelopment around South Harbour and stimulate wider economic development across Aberdeen and beyond.

Other areas:

We also suggest that other areas around Altens and East Tullos (identified as Areas 2 and 3 within AHB's 'Benefiting from Growth' Document) are identified as Opportunity Sites within the LDP 2022 Proposed Plan or that any employment and/or mixed use allocation is extended to support new industrial, manufacturing, offices and warehouse uses etc. We also suggest that new areas identified for potential infrastructure provision to facilitate expansion at South Harbour are nominated as infrastructure priorities within the LDP 2022 Proposed Plan.

North Harbour:

Similarly, we suggest that a new Opportunity Area is created around the existing North Harbour to allow for the retention of its core harbour-related function but (at a later date, potentially within the later stages of the 10 year LDP 2022 timeframe) to consider potential opportunities to include complementary uses around the retained operational core.

This approach could facilitate a balanced mix of uses that could supplement a core operational port within North Harbour, combined with further expansion of complementary options, should South Harbour be redeveloped in line with the aspirations outlined above.

AHB would welcome an opportunity to work with ACC to prepare updated masterplans covering these areas to reflect the redevelopment options and the ambitions outlined above. This will ensure that these approaches align with the combined spatial strategy for this part of Aberdeen, including ACC's City Centre Masterplan.

#### **Question 4 New Healthcare Facilities**

**Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:**

### **3 Aberdeen City Centre and the Network of Centres**

#### **Question 5 City Centre Boundary**

**Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:**

#### **Question 6 City Centre Masterplan Intervention Areas**

**Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:**

We agree that the identification of the City Centre Masterplan intervention areas within the LDP 2022 could be a sensible approach if the forthcoming Planning Bill is enacted and Supplementary Guidance is removed from the planning process, however, we note that there is some uncertainty on the implementation of this Bill. As such, we do not encourage the direct substitution of the City Centre Masterplan Areas into the LDP 2022 without full and detailed dialogue with key landowners/stakeholder and without a more refined masterplanning process to test the project deliverables within the City Centre Masterplan.

AHB are also undertaking a Property Estate Strategy and Masterplan to add detail to the proposals identified in the Bay of Nigg Development Framework at South Harbour and begin the process of transforming land around the North Harbour. We see this as an important component in influencing the development of such City Centre Masterplan intervention areas in addition to wider aspirations within the LDP 2022 for land at North Harbour, South Harbour and AHB's wider estate.

We would request that AHB be involved in shaping refined masterplans for the intervention areas through detailed dialogue with ACC to facilitate their involvement in key decisions covering City Centre Masterplan Areas over land within AHB's estate, and in particular, land at Torry Waterfront (at South Dee).

If ACC are looking to take forward this strategy - to bring forward the City Centre Masterplan intervention areas within the LDP 2022 - we also recommend that the same approach is also applied to development sites/interventions identified within the Bay of Nigg Development Framework (Years 0-5 to Years 10-15) - which we suggest are allocated as Opportunity Sites within the LDP 2022 to allow them the same level of support as the City Centre Masterplan intervention areas.

#### **Question 7 City Centre Retail Core**

**Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:**

#### **Question 8 Union Street Frontages**

**Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:**

#### **Question 9 Out of Town Retailing**

**Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:**

#### **Question 10 Commercial Leisure Uses**

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:

#### **Question 11 City Centre Living**

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:

#### **MAIN ISSUE 1 Living in the City Centre**

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:

Not Answered

#### **Question 12 Residential Development in the City Centre**

Are there any other locations within the City Centre where residential accommodation could be provided?:

#### **MAIN ISSUE 2 A 24-Hour City**

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Not Answered

#### **Question 13 Encouraging the Creative Arts**

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:

#### **Question 14 Proposals for Creative Arts**

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

#### **Question 15 Percent for Art**

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:

#### **MAIN ISSUE 3 Support for Visitor Attractions**

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Not Answered

### **4 Quality Places**

#### **MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development**

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:

Not Answered

#### **Question 16 External Space Standards**

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:

#### **Question 17 Natural Environment**

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:

AHB do not believe that the proposed list of policies covering 'Natural Environment' gives a clearer and more coherent structure than currently shown.

For example, the allocation of Opportunity Sites (and in particular Opportunity Site 62 covering South Harbour within the Adopted LDP 2017) would have a competing interest with various environmental designations. Specifically, the allocation for Opportunity Site OP 62 expressly encourages development proposals to maximise opportunities for redevelopment associated with the harbour expansion at South Harbour. In contrast, the Green Belt and Green Space Network LDP Policies (now proposed as Green Belt and Green & Blue Infrastructure policies) would protect, preserve and restrict development within the same location. This approach does not provide the coherence and clarity that ACC are seeking.

It is therefore suggested that ACC consider the removal of the existing Green Belt and Green Network (Green & Blue Infrastructure) Policy allocations within the LDP 2022 Proposed Plan within the following locations:

- a) Land within South Harbour (LDP Policy B5);
- b) Land within Opportunity Site 62; and
- c) Land around Opportunity Site 62 at South Harbour (including Areas 1 and 2 within AHB's 'Benefitting From Growth' Document (attached)).

Overall, the Green Belt and Green Space Network (Green & Blue Infrastructure) Policy allocations could significantly restrict the potential expansion around South Harbour. AHB therefore contend that their removal would stimulate wider economic benefits associated with the expansion of South Harbour in line with the Bay of Nigg Development Framework and wider economic aspirations within Aberdeen and beyond.

#### **Question 18 Food Growing**

**How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:**

### **5 Transport and Infrastructure**

#### **Question 19 City Centre Parking**

**Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:**

We welcome ACC's inclusion of the 'Aberdeen Harbour Expansion' as a major committed transport scheme within Aberdeen. However, we note that there is limited detailed discussions on infrastructure delivery and its critical role in stimulating wider economic benefits, albeit, we accept that content within the MIR would not necessarily provide a comprehensive review of all transport and infrastructure matters.

Accordingly, we suggest that further discussion is included within the forthcoming LDP 2022 Proposed Plan outlining the critical role that Aberdeen Harbour (North and South Harbours) play in addressing transportation and infrastructure priorities within the North East of Scotland but also stimulating wider economic development benefits across Scotland.

In this regard, we suggest that this matter is clearly highlighted within the LDP 2022 Proposed Plan and we recommend that other proposed infrastructure improvements within the Bay of Nigg Development Framework are included as infrastructure priorities within the LDP 2022 Proposed Plan as follows:

- a) Upgrades to Souter Head Roundabout;
- b) Improvements to roads linking Coast Road to Souter Head Roundabout;
- c) East Tullos Link (Various Options);
- d) Junction improvements from Wellington Road into East Tullos;
- e) Provision of a Rail Halt at East Tullos; and
- f) Connections from Torry to East Tullos and Rail Halt.

#### **MAIN ISSUE 5 Electric Vehicle Charging Infrastructure**

**How best can we encourage the provision of infrastructure to support changes in transport technologies? :**

Not Answered

#### **Question 20 Digital Infrastructure**

**Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:**

#### **Question 21 Developer Obligations and Infrastructure Delivery**

**Do we need to change our approach to securing developer obligations for future development proposals?:**

### **6 Resource and Business Policy**

#### **MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency**

**Should the requirement of existing Policy R7 be changed?:**

Not Answered

## **Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency**

**What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:**

## **Question 23 Solar Farm Developments**

**Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:**

## **MAIN ISSUE 7 Heat Networks**

**Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:**

Supporting heat networks within the City could strengthen support for the redevelopment of South Harbour as it could facilitate future connection from port-related development around South Harbour to the NESS Energy From Waste site at East Tullos.

AHB would consider working closely with ACC and heat providers to consider how the expansion of heat networks within Aberdeen could be introduced around South Harbour.

AHB consider that the expansion around South Harbour could facilitate greater connectivity between high heat demand areas - including port and industrial related industries - to existing/new heat sources.

Critically, AHB is not in a position to provide and deliver heat network pipelines nor connections but they could liaise with ACC and heat providers to ascertain how future strategies could be implemented to facilitate support for the wider transfer of sustainable heat and power within Aberdeen.

We understand that the NESS Energy from Waste facility at East Tullos is currently under construction and any future connectivity to this facility could be explored through further expansion of port and associated industrial activity around South Harbour.

Not Answered

## **Question 24 Supporting Business and Industrial Development**

**Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:**

AHB consider that protection should be afforded to business and industrial uses within Aberdeen Harbour to ensure that harbour-related operations are not compromised. This is particularly important for land at South Harbour which will be the focus of harbour-related operations going forward - as market demand for operational facilities at South Harbour is significantly greater than originally anticipated. Specifically, successful discussions with various future stakeholders has taken place, outlining that there is market interest for port-related expansion and regeneration opportunities around South Harbour.

Within North Harbour, such protection will be required to be provided around the inner core to retain operational harbour uses in this location. However, if opportunities to facilitate change around South Harbour are fully realised, the potential for redevelopment around North Harbour could be significant in the future. Therefore, flexibility to accommodate complementary development opportunities around North Harbour should be considered within the LDP 2022 Proposed Plan (for example, towards the end of the 10 year LDP lifecycle).

## **MAIN ISSUE 8 West End Office Area**

**Should the policy support a mix of uses in the West End Office Area? If so, what types?:**

Not Answered

## **8 Sustainable Mixed Communities**

### **MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)**

**How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:**

Not Answered

### **MAIN ISSUE 10 Residential Care Facilities**

**How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:**

Not Answered

### **MAIN ISSUE 11 Student Accommodation**

**How can the Local Development Plan cater to proposals relating to student accommodation?:**

Not Answered

## **MAIN ISSUE 12 Houses in Multiple Occupation**

**How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:**

Not Answered

**Percentage limit of HMOs in each area:**

**Please explain why you chose your answer:**

**Geographical boundary of each area:**

**Please explain why you chose your answer:**

**Threshold for when planning permission is required for a HMO:**

**Please explain why you chose your answer:**

### **Question 27 Community Planning**

**Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:**

### **Question 28 Changing Places Toilets**

**Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:**

### **Additional Documents**

**Please include comments on other documents below:**

**Please include comments on other documents below::**

### **Additional Files**

**If you have further information you would like to provide you may upload it here.:**

20832-EH-M-Ind01-B-Benefitting from Growth.pdf was uploaded



**BENEFITTING  
FROM  
GROWTH**





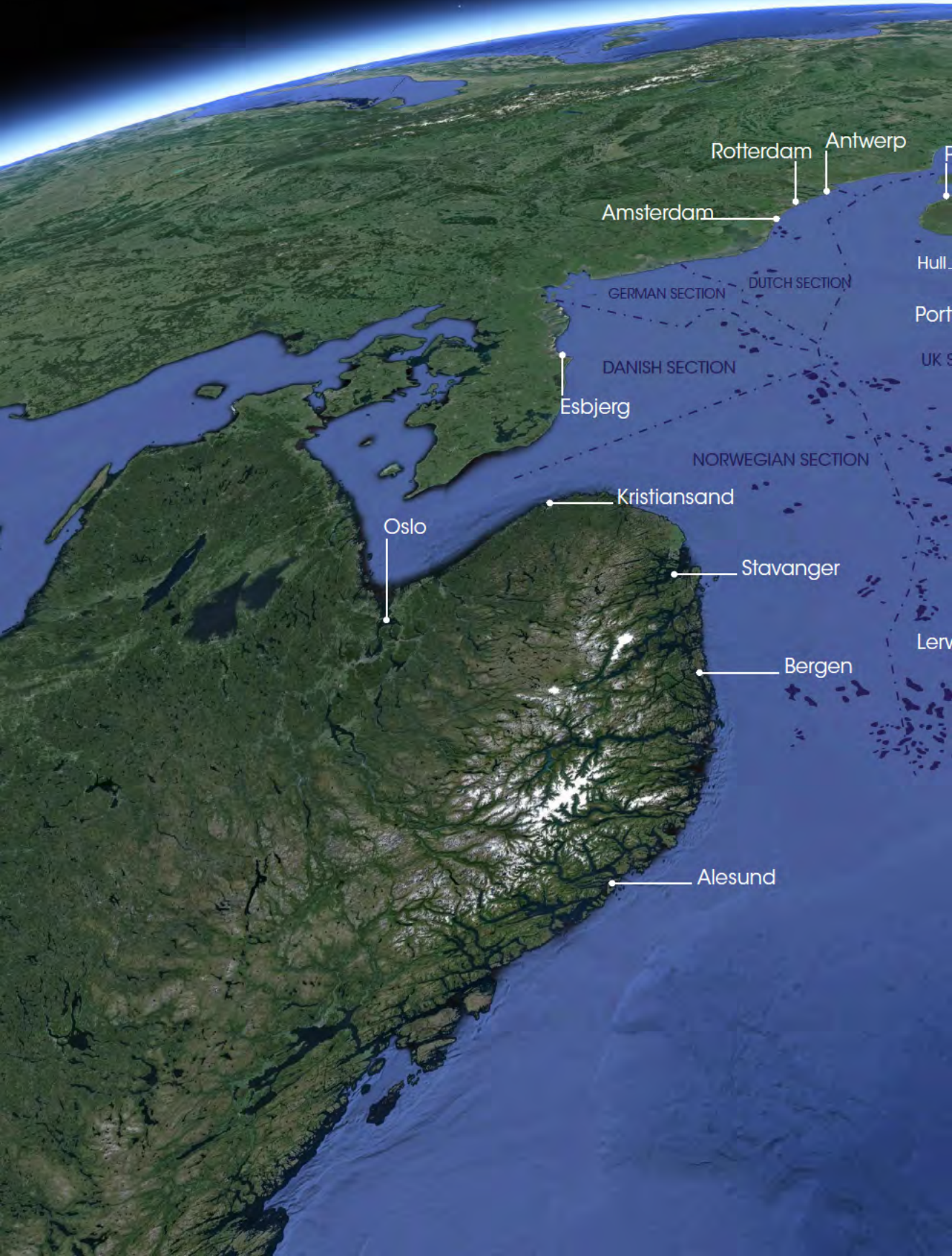




# CONTENTS

01   Purpose .....	05
02   A Changing Harbour Estate .....	08
03   The Policy Context .....	11
04   The Scale of Change.....	19
05   Implications and Policy Recommendations .....	24
06   The Bigger Picture .....	27





Rotterdam  
Antwerp  
Amsterdam

GERMAN SECTION  
DUTCH SECTION

DANISH SECTION

Esbjerg

NORWEGIAN SECTION

Kristiansand

Oslo

Stavanger

Bergen

Alesund

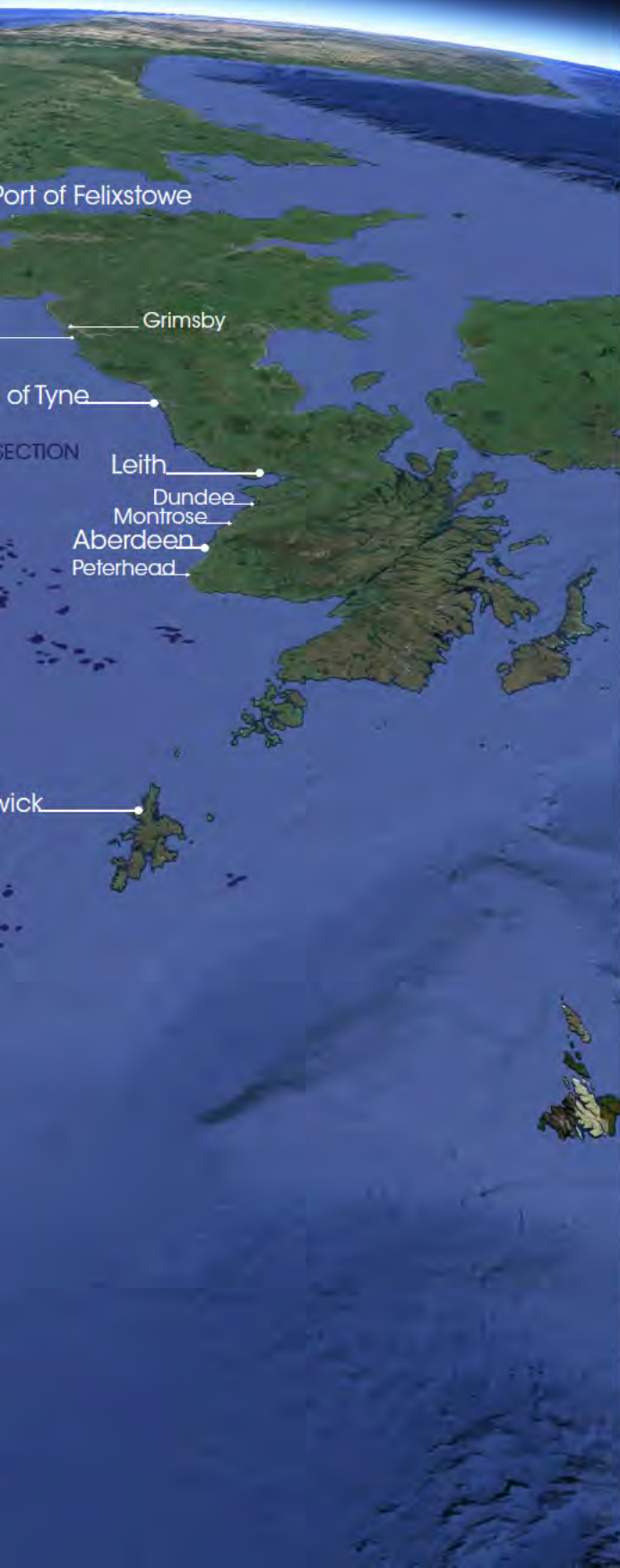
Hull

Port

UK S

Ler





## 01 | Purpose

1.1 As Aberdeen Harbour Board progresses the delivery of a new harbour at Nigg Bay, now is the time to identify how best to maximise the impact of this significant and vital infrastructure investment for businesses, communities and the wider city region. A key factor in ensuring this modern harbour is fit for purpose and able to respond to the current and emerging demands of port users is to plan for long term development alongside this new infrastructure.

1.2 Futureproofing for essential infrastructure and associated development is particularly imperative in the context of a changing statutory planning background. In line with the progression of the Planning Bill (anticipated to form legislation in mid-2019), Local Development Plans will emerge in 10-year cycles; the remit of Strategic Development Plans will change, or disappear altogether; and the National Planning Framework 3 and Scottish Planning Policy (SPP) are set to become much more involved at the regional planning policy level.

1.3 In parallel with this new approach to planning policy, the Infrastructure Commission for Scotland (ICS) has recently been established by the Scottish Government in order to advise on key strategic and national infrastructure to significantly boost economic growth. The ICS have identified a number of strategic drivers including:

- the markets and connections Scotland requires for goods, services and people;
- securing Scotland's international competitiveness; prioritisation of investment to deliver inclusive economic growth and low carbon objectives; and
- place-making.



1.4 Interaction between infrastructure investment priorities and development planning and delivery is crucial to drive Scotland's economic growth.

1.5 The importance of the Aberdeen Harbour Expansion Project (now named South Harbour) to Scotland's economic growth is recognised through its identification as a National Development within National Planning Framework 3. Importantly, delivered on time and in line with the original vision. In the context of the forthcoming National Planning Framework 4, the opportunities created through the delivery of the new South Harbour at Nigg Bay – for both Aberdeen and Scotland – should continue to be recognised with the focus now on benefitting from the significant investment in harbour infrastructure.

1.6 The Aberdeen City Council (ACC) Proposed Local Development Plan 2022 (LDP 2022) is an important step in this process and provides a unique opportunity to maximise Aberdeen's unrivalled position to benefit from this nationally recognised development. This document builds upon the suite of information already undertaken and illustrates the economic and physical opportunities presented by the delivery of the South Harbour at Nigg Bay, and how the City of Aberdeen can truly benefit from growth.

1.7 At Aberdeen Harbour Board we recognise the important contribution that key stakeholders across the City and nationally played in the development of our ideas for South Harbour. We would like to involve those same parties and others in ongoing dialogue on how we can 'Benefit from Growth'.











## 02 | A Changing Harbour Estate: The One Harbour Vision

2.1 The construction of South Harbour is well underway. It is anticipated that the harbour will be operational in Summer 2020. Specifically, Aberdeen Harbour Board will be pushing for South Harbour to play a critical role in further diversifying the Aberdeen Harbour offer. As expected, there is already significant momentum into the key growth sectors including:

- Offshore renewables;
- Decommissioning; and
- Cruise tourism.

2.2 South Harbour will also enhance our role as the UK's centre of excellence for offshore oil and gas exploration. Our 'One Harbour' vision will allow us to be the leader in the North Sea and the primary hub within Scotland for marine-based industry, decommissioning, associated logistics, renewable energy and, most critically, passenger transport and tourism.

2.3 Equally as exciting for the future of Aberdeen is the transition of North Harbour's role – and in particular the tight operational core closest to the city-centre.









## Implications

2.4 Commercial interest in South Harbour also means demand for land close to it. This, again, is as expected, with various sites/areas identified within the Bay of Nigg Development Framework that seek to benefit from the growth associated with the South Harbour development. These are discussed in detail later within this document.

2.5 If opportunities to facilitate change around South Harbour are fully realised, and benefit from the infrastructure investment to date, the potential for redevelopment around North Harbour could be significant. A forward thinking, and ambitious LDP 2022 might identify such aspirations as fundamental to the long term prosperity and diversification of Aberdeen.

2.6 To manage such change, support would be required from all levels of planning policy. From the emerging National Planning Framework 4, the Aberdeen and Aberdeenshire Strategic Development Plans at the regional level (if they still exist following the Planning Bill amendments) down to the LDP 2022 and area-specific masterplans at South Harbour, Altens, East Tullos and South Dee (quantifying policy aspirations at a local level).

2.7 It is likely that in line with the One Harbour Vision, significant growth around South Harbour could be identified in the updated Bay of Nigg Development Framework non-statutory planning guidance. The recently commissioned Aberdeen Harbour Board Property Strategy and Masterplan would also outline the feasibility and scope of any redevelopment areas in order to facilitate their support (in policy terms) for redevelopment.

2.8 From a planning and land use perspective, it is clear that the changing dynamics between the role of the North Harbour and South Harbour as the primary focus for primary harbour operations will be critical not only to economic growth in Aberdeen City and Region but also the physical regeneration of the City Centre. Any future vision must prioritise the provision of Aberdeen Harbour Board's port-related facilities within Aberdeen and the interests/needs of port users. As such, Aberdeen Harbour Board's stakeholders will be at the forefront of any future strategy going forward. However, Aberdeen Harbour Board are also committed to the future success of the City and there is an opportunity to consider how areas which have remained in port use for many years could be transformed alongside the regeneration initiatives included in the City Centre Masterplan.





## 03 | The Policy Context

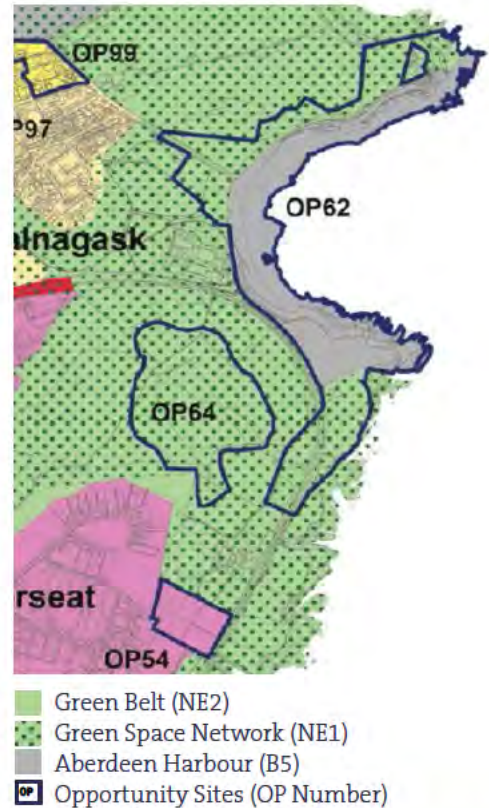
### A Plan Led Approach

3.1 The adopted LDP 2017 effectively sets ACC's statutory land use policy for Aberdeen. The majority of (if not all) the current and proposed operational land at North Harbour and South Harbour is allocated under LDP Policy B5 - Aberdeen Harbour - which outlines a presumption in favour of harbour infrastructure and ancillary uses that are required for the effective and efficient operation of the harbour and are functional requirements to this use.

3.2 This is contrasted with restrictive LDP policy objectives around South Harbour which is zoned as Green Network (under LDP Policy NE1) and Green Belt (under LDP Policy NE2). These policies seek to prevent development that destroys or erodes the green network (LDP Policy NE1) or development that is not compatible with the natural setting of the green belt (LDP Policy NE2). Despite this, there are exceptions within both policies allowing for the development of 'major infrastructure projects' as long as the coherence of the green network can be retained or 'essential infrastructure' - specifically transport proposals identified within the LDP - if they cannot be accommodated anywhere other than the Green Belt.

3.3 Therefore, support for the expansion of the South Harbour to provide harbour infrastructure and/or ancillary uses that are required for the effective operation of the harbour (in line with LDP Policy B5) could comply with exceptions criteria for both LDP policies above. However, it would be far more difficult to obtain support for unrelated industrial development if they could not meet these green belt or green network

policy requirements. In such circumstances, material considerations that outweigh the Development Plan may need to be relied upon to justify support or, alternatively, and more controversially, a review of green belt and green network allocations could be considered as an appropriate mechanism within the LDP 2022 to facilitate the realisation of non-operational port or industrial expansion around South Harbour.

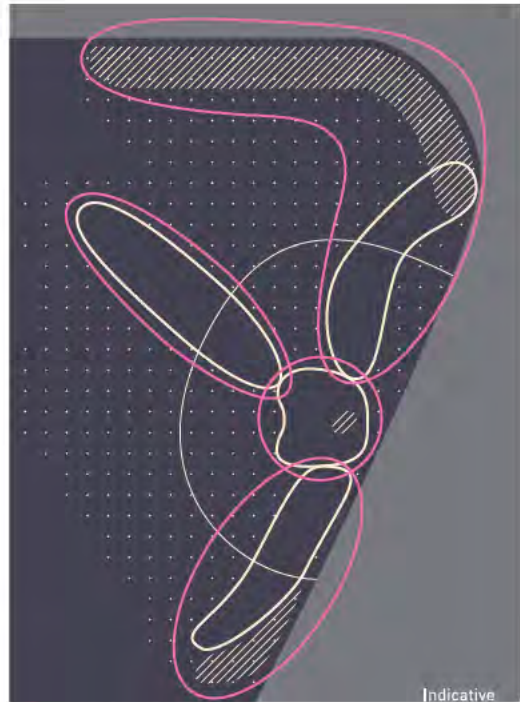


LDP Policy B5 - Aberdeen Harbour & Opportunity Site OP62 - Nigg Bay

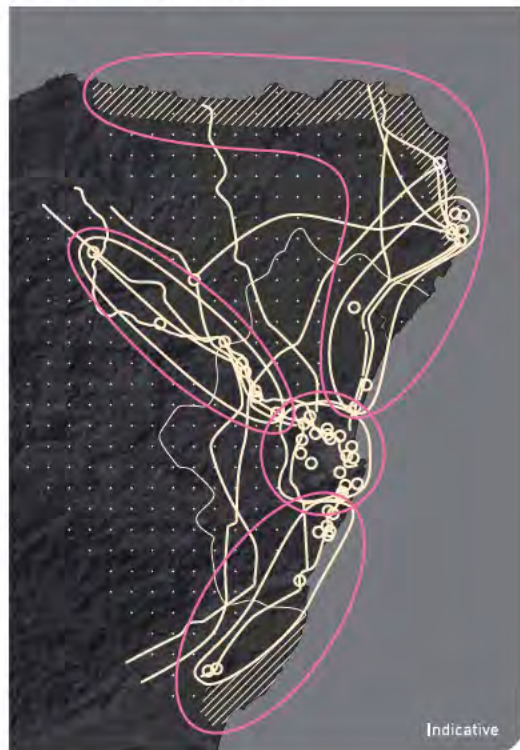
3.6 Beyond this, the wider South Harbour is identified as an Opportunity Site (Ref: OP62 - Nigg Bay) in the adopted LDP 2017 stretching across a 55 ha area that includes the South Harbour and the temporary construction areas. This provides Aberdeen Harbour Board with strong policy support for port-related expansion within this area, subject to meeting various requirements including:

- The provision of a detailed masterplan to create a vision for any additional port-related expansion.
- Mandatory documentation including:
  - » Flood Risk Assessment; and
  - » 'Full' Transport Assessment;
- In addition to other likely accompanying documentation including:
  - » Landscape and Visual Impact Assessment;
  - » Open Space Assessment;
  - » Drainage Impact Assessment;
  - » Ecological Assessment;
  - » Protected Species Assessment;
  - » Noise Impact Assessment;
  - » Transport Assessment;
  - » Economic Appraisal;
  - » Arboricultural Assessment;
  - » Design and Access Statement; and
  - » Planning Statement.

3.7 At the local level, the Bay of Nigg Development Framework, already sets out a vision to maximise the benefits provided through the development and delivery of South Harbour and the Aberdeen Harbour Development Framework which sets out development aspirations for North Harbour (largely to safeguard its current use).



-  Spatial Concept
-  Strategic Growth
-  Regeneration
-  Local Growth
-  Housing Market Area





3.6 At the regional level, in principle support is also provided for new associated development around North and South Harbour within the adopted Aberdeen City and Shire Strategic Development Plan.

3.7 Aberdeen City is identified as a strategic growth area and the City Centre (including North Harbour) is identified for strategic regeneration.

3.8 The Strategic Development Plan then identifies 'Aberdeen Harbour' - relating to North Harbour as this was the sole harbour at the time the Strategic Development Plan was prepared - as a 'vital gateway for the regional economy' and as a 'key port' within Scotland.

3.9 Critically, the Strategic Development Plan identifies the harbour (i.e. North Harbour) as a 'Key Port in the National Renewables Infrastructure Plan' suggesting that growth aspirations for the existing harbour (i.e. North Harbour) should be accommodated. This effectively encourages the harbour expansion beyond North Harbour in line with Aberdeen Harbour Board's Case for Growth document which, in turn, supported the approval and subsequent construction of South Harbour at the Bay of Nigg.

3.10 Finally, the Aberdeen Harbour Expansion Project (i.e. South Harbour) is also identified within the National Planning Framework 3 - which represents the top tier of Scotland's Planning Hierarchy. This national 'designation' provides national support for South Harbour establishing its need at the Bay of Nigg but also setting a baseline from which options for wider economic growth can stem.

## Interactions between the LDP and the Development Frameworks

### *The status of the ACC's Development Frameworks*

3.11 Whilst there are various policy documents to support Aberdeen Harbour Board's aspirations for future growth, the development frameworks for North and South Harbour have not been fully adopted as Supplementary Guidance by ACC. Whilst we expect them to have a role in shaping future development opportunities, greater clarity on this matter would be valuable. In saying that, we do not anticipate a change in message.

3.12 The Bay of Nigg Development Framework and Aberdeen Harbour Development Framework are accepted as non-statutory planning advice and they are considered as material planning considerations in the determination of applications. Crucially, they are in the same technical position as the City Centre Masterplan.

3.13 With increasing interest in growth around South Harbour, it is vital that the longer term aspirations identified within the Bay of Nigg Development Framework are taken forward and perhaps even expanded upon either by inclusion within new LDP 2022 or within updated Supplementary Guidance Documentation. It seems that ACC are encouraging the former in relation to the City Centre Masterplan - which also hasn't been adopted as Supplementary Guidance. If this is the case, this may be the most appropriate approach for Aberdeen Harbour Board to pursue to ensure that the objectives/interventions within the Bay of Nigg Development Framework (and Aberdeen Harbour Development Framework for that matter) are truly reflected within a planning policy document that has statutory status.

3.14 It is also noted that the Bay of Nigg Development Framework outlines that complementary masterplans will be developed for each development area identified and that these will be included within the LDP, and likely taken forward within the LDP 2022.





### How do the policy aspirations within the BNDF fit within the current situation and LDP policy?

3.15 The Bay of Nigg Development Framework was produced over 12 months and with the support of a working group made up of a number of partner organisations including ACC. The key objectives sought:

- To inform the process of clearly defining the extent and content of the forthcoming applications for the new harbour at Bay of Nigg and its associated facilities;
- **To inform the preparation of the proposed Local Development Plan;**
- To consider the interaction with the Aberdeen City Centre Development Framework;
- **To establish a clear brief for more detailed masterplans at the new harbour, Altens and East Tullos;**
- To ensure consideration and identification of all opportunities to promote sustainable, low-carbon development that also maximise the benefits of green infrastructure;
- **To consider how surrounding land uses can evolve to maximise opportunities to benefit from the arrival of this major piece of investment;**
- **To identify aspects of broader strategic infrastructure investment, including roads and rail, that will support this process and consider ways in which all stakeholders can work together to deliver this infrastructure;**
- To involve local people at the heart of this process and identify mechanisms which ensure an ongoing benefit to those communities;

- To engage with local business and landowners on these matters; and,
- To consider environmental impacts and, wherever possible, commit to the protection and enhancement of the natural environment and biodiversity.

3.16 Critically, it tried to identify how land and infrastructure might be improved by the construction and operation of the new harbour. Given that the new LDP 2022 will run from 2022 – 2032 it is eminently clear that there is a fundamental need to accommodate the itinerary/interventions identified within the Nigg Bay Development Framework into the LDP2022.

3.17 Based on this, how does the above impact delivery of the Bay of Nigg Development Framework policy interventions:

#### *Years 0-5*

3.18 The proposed 0-5 year interventions within the Bay of Nigg Development Framework are outlined in the table opposite.

3.19 This includes:

- **Years 0-5 (Effectively 2015-2020):** Provision of the New South Harbour, road realignment at the harbour entrance, improvements to Coast Road and introduction of improved footpath/cycling connections. A critical objective was to expand potential range of uses and attract new work streams at the harbour – this aspiration seems to already be coming to fruition with varied workstreams proposed within the harbour.

3.20 South Harbour is currently under construction (in 2019) and will be operational by 2020. The initial infrastructure improvements above are also underway and will be in place in time for the operation of the harbour. The provision of masterplans for the local areas is also anticipated but have not yet commenced.



Years 0-5 Interventions Within the NBDF			
	Year	Development Component	Delivery
Pre-Construction	2016	Preparation of Bay of Nigg Masterplan	Aberdeen Harbour Board
Construction	2017	Infrastructure Improvements i.e. potential alteration to Coast Road bridge line markings, signal timing, potential overlay improvements, potential widening of Coast Road (between Coast Road Bridge and Hareness Road, as required).	Aberdeen Harbour Board / Aberdeen City Council
	2017	Temporary construction areas	Aberdeen Harbour Board
	2018	Formation of Breakwaters	Aberdeen Harbour Board
	2018	Formation of Quays	Aberdeen Harbour Board
Post-Construction	2019	New Harbour becomes operational	Aberdeen Harbour Board
	2019	Consideration of additional land through LDP review	Aberdeen City Council
	2019	Preparation of Altens Masterplan	Aberdeen City Council / Scottish Enterprise / Developers / Landowners
	2020	Reinstatement of temporary construction areas as public open space	Aberdeen Harbour Board
	2021	Reinstatement and realignment of Coastal Path	Aberdeen Harbour
	2021	Preparation of East Tullos Masterplan	Aberdeen City Council / Scottish Enterprise / Developers

### Progress with Construction

3.21 The success of AHB's discussions with future stakeholders (across the shipping, marine, survey, decommissioning, passenger transport and leisure sectors) has stimulated significantly greater demand for operational facilities to be offered at South Harbour quicker than originally anticipated. This includes more demand for berthing areas, quayside space, storage and laydown areas, passenger disembarking and parking areas etc and, more generally, higher demand for port-related expansion and regeneration across South Harbour.

3.22 This means that earlier interventions within the Bay of Nigg Development Framework, encouraging further expansion and 'next steps' in the redevelopment of adjacent and nearby areas that would benefit from the expansion at South Harbour, are already close to

being realised. In turn, this establishes the need for further port related expansion on adjacent areas and the realisation of longer terms aspirations within the Bay of Nigg Development Framework within the short to medium term. For example, the provision of interventions that will assist with the redevelopment of Altens Industrial Estate and East Tullos Industrial Estate. It is for precisely this reason that we need clarity now on the position of the Bay of Nigg Development Framework and its next steps.

3.23 You will note that the majority of the additional land is identified within Years 0-5 as short term interventions - that discuss reinstatement of temporary construction areas etc - and are now surely in question as this land could offer at least some scope for development now. We note and would welcome further clarity on Opportunity Site OP62 which specifically encourages harbour expansion in the location covered by this allocation.

### Years 6-10

3.24 Interventions identified within the Bay of Nigg Development Framework are summarised in the table below as follows:

Years 6-10 Interventions within the BDNF		
Year	Development Component	Delivery
6	Updates to Souter Head Roundabout	Aberdeen City Council / Developers
7	Improvements to roads linking Coast Road to Souter Head Roundabout	Aberdeen City Council / Scottish Enterprise / Developers
7	Construction of Altens sites	Scottish Enterprise / Developers
8	Consideration of additional land through LDP review	Aberdeen City Council
10	Decision on East Tullos Link	Aberdeen City Council

3.25 This includes:

- **Years 6-10:** Priorities to facilitate the development of Altens Industrial Estate through road improvements but also to secure the development of underused or empty sites through their allocation in the LDP.

3.26 This is not being delivered yet and is not identified within the adopted LDP nor the emerging LDP but it coincides with the timescales in the LDP 2022 so **ACC must surely contemplate the works within the timescale of the LDP 2022 and allocate land for such purposes. Specifically, identifying infrastructure improvements within the LDP 2022 for such purposes to facilitate the abovementioned regeneration aspirations.**

### Years 11-15

3.27 Interventions identified within the Bay of Nigg Development Framework in years 11-15 are summarised in the table below as follows:

Years 11-15 Interventions Within the BDNF		
Year	Development Component	Delivery
11	Access from Bay of Nigg into East Tullos	Scottish Enterprise / Aberdeen City Council / Developers
13	Redevelopment of East Tullos	Scottish Enterprise / Developers
13	Consideration of additional land through LDP review	Aberdeen City Council / Developers

3.28 This includes:

- **Years 11-15:** Priorities include: access road across St Fitticks Park and under railway line or new bridge crossing the railway with link road around the landfill edge between the Coast Road and East Tullos; redevelopment of East Tullos and provision of additional sites through their allocation in the LDP.

3.29 These longer term options have not yet been implemented in practice but future land release and infrastructure improvements through the LDP 2022 will be critical to facilitate medium to long term ambitions in this area (particularly given the potential for 10 year LDPs).

3.30 Overall, it is therefore critical that the above interventions from Years 6-10 and Years 11-15 are visibly identified within the LDP 2022 as ACC's Bay of Nigg Development Framework expressly seeks their implementation within the corresponding timescales of the LDP 2022 (i.e. 2022 to 2032).



### Years 16-20

3.31 Interventions identified within the Bay of Nigg Development Framework in years 16-20 are summarised within the table below.

3.32 Similarly, longer term options are still to be realised following adoption of earlier interventions but the potential release and allocation land through LDP 2022 will be critical to facilitate these longer term ambitions - particularly with a 10 year LDP - as it is likely that these interventions could come forward within the later part of the forthcoming LDP if it runs from 2022 – 2032.

#### Implications for the LDP 2022:

3.33 In policy terms, the aspirations within the Bay of Nigg Development Framework are not included within the LDP despite the fact that the development aspirations within years 0-5 of the Bay of Nigg Development Framework area are already close to being realised (excluding the preparation of masterplans to support these interventions). With the implementation of the LDP in 2022 - another 3 years away - we anticipate the completion of the development aspirations with the Bay of Nigg Development Framework will be further progressed.

3.34 Therefore, it is critical that the emerging LDP 2022 takes account of and includes a

programme of works set out within the Bay of Nigg Development Framework. That would mean outlining not only South Harbour as an opportunity area but identifying opportunity areas within all sites adjacent to the harbour and along the primary corridors as identified within the Bay of Nigg Development Framework. In addition, this may even require the removal of the green belt allocation to reflect changing circumstances around the harbour and the expedient delivery of port-related regeneration in this area. This is particularly important given the competing (and restrictive) nature of the green belt/ green network policy ambitions against the Opportunity Site 62 allocation which encourages port-related expansion.

3.35 The implications for ACC's statutory policy framework relating to strategic growth within Aberdeen and increased demand/utilisation of the South Harbour for port, industrial, passenger transport/tourism and other potential marine related uses is fundamental. Critically, such growth will also begin to facilitate the movement of primary harbour related operations to South Harbour. It would be increasingly difficult to propose any significant change in the function of North Harbour without clarity in the planning for development around South Harbour.

Years 16-20 Interventions Identified Within the BNDF		
Year	Development Component	Delivery
16	Redevelopment of East Tullos	Scottish Enterprise / Developers
17	Improvements to junction from Wellington Road into East Tullos	Scottish Enterprise / Aberdeen City Council / Developers
18	Improvements to path network on Tullos Hill	Developers
18	Rail Halt	Network Rail
19	Improvements of connections from Torry to East Tullos and Rail Halt	Aberdeen City Council
20	Consideration of any additional land requirements through LDP review	Aberdeen City Council / Developers









## 04 | The Scale of Change

### Introduction

*Aberdeen Harbour Board are in the process of commissioning an Property Estates Strategy and Masterplan built on the proposals identified within the Bay of Nigg Development Framework around South Harbour but also to begin the process of transforming the land around North Harbour. Central to this will be the operational effectiveness of our port, and this Masterplan will outline a set of strategic ambitions for our growth strategy that could identify long term change in both locations.*

4.1 The following outlines target areas that could be considered for future developed to stimulate port-related regeneration associated with the successful growth of port-related, tourism, marine and other industrial uses around South Harbour. This includes:



### 1. Sites within the red line planning application boundary which are currently subject to temporary consents:

- a) St Fitticks - Land to the north of the new Greyhope Road junction with St Fitticks Road and on land directly to the west of the new Coast Road realignment, to the west of the northern section of the proposed West Quay;
- b) Girdleness - Parts of Greyhope Road and land to the south and east of Greyhope Road;
  - » i) We note that a temporary construction compound is currently located within Walker Park, however, this area is likely to remain open space/public realm in the future given its importance to the local community.
- c) Gregness - On land directly to the north and south of the proposed southern breakwater access road on the southern headland, to the east of Coast Road including parts of Loirston Country Park (excluding the Gregness coastguard station and communications masts); and
- d) Land to the north of the realigned Greyhope Road (between the two temporary construction areas).



**2. Sites which sit adjacent to these areas, which feature in the growth scenarios in the approved Bay of Nigg Development Framework and which could be developed utilising exiting road / other infrastructure:**

- a) Northern half of Altens Industrial Estate (Purple hatching in Bay of Nigg Development Framework years 6-10) outwith junction and infrastructure improvement areas;
- b) Land at St Fitticks Park (to the west of Nigg Waste Water Treatment Works and adjacent to the St Fitticks temporary construction area);
- c) Doonies Farm & adjacent areas (West of Coast Road);
- d) Land west of Coast Road at Hareness Road Junction;
- e) Nigg Waste Water Treatment Plant;
- f) Former Ness Landfill; and
- g) Land around Tullos Hill.



**3. Sites which sit adjacent to these areas, which feature in the growth scenarios in the approved Bay of Nigg Development Framework but which could only be developed utilising exiting road / other infrastructure.**

This largely relates to sites in East Tullos Industrial estates and includes:

- a) Southern half of Altens industrial estate (Purple in Bay of Nigg Development Framework years 6-10, south of the proposed infrastructure improvements area);
- b) East Tullos Industrial Estate (Purple in Bay of Nigg Development Framework years 16-20) - once major infrastructure improvements are constructed to provide direct access from South Harbour to East Tullos (via St Fitticks Park and an underpass or a new bridge over the railways line and road around the edge of Ness Landfill); and
- c) Land for provision of a rail halt and rail sidings.





#### 4. Sites which do not feature in the original Bay of Nigg Development Framework

- a) Land south of Balnagask Golf Course;
- b) Land to east of Coast Road (opposite Doonies Farm);
- c) Land to East of Coast Road (opposite Harness Road Junction); and
- d) Land to East of Coast Road (opposite Langdykes Road).



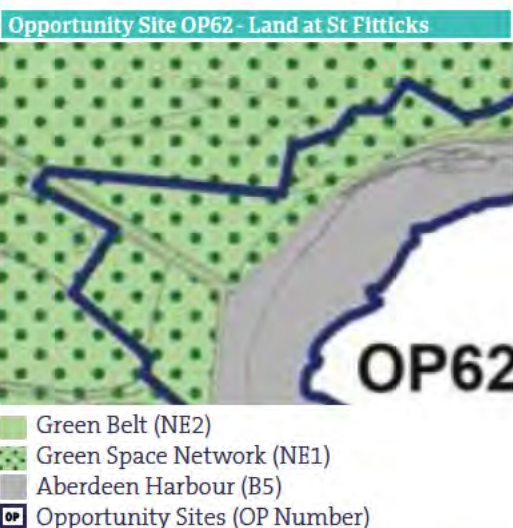
## 05 | Implications and Policy Recommendations

5.1 As outlined above, the potential for increased growth around South Harbour for port, passenger transport, tourism and associated industrial activity will be critical to stimulate wider economic benefits within Aberdeen and beyond.

5.2 Therefore, the following outlines a range of recommendations that could be introduced by ACC within the forthcoming LDP 2022 to stimulate growth around South Harbour. It also identifies potential implications to growth should ACC continue with the current policy approach (outlined within the adopted LDP 2017 and the LDP 2022 Main Issues Report). This includes:

1. The development/infrastructure priorities within the Bay of Nigg Development Framework at least up to Year 15 (i.e. 2032) should be identified in the LDP 2022.
2. The programme for development in the Bay of Nigg Development Framework should be referenced and inform spatial priority or opportunity areas within the LDP 2022.
3. The programme for change within the LDP Main Issues Report therefore needs to be more flexible and the LDP 2022 should include the Bay of Nigg Development Framework ambitions and wider aspirations to redevelop land around South Harbour.
4. Based on Aberdeen Harbour Board's recent discussions with interested parties and key stakeholders, the pressure is mounting on the programme timescales identified within the above Bay of Nigg Development Framework programme and the timescales for the proposed implementation of such intervention. **As such, there is a critical need to invest more heavily in strategic growth around both South and North harbours and for ACC to create a positive statutory framework to encourage the delivery of such aspirations.**
5. Some of this change (and redevelopment opportunities) can be facilitated

within the remit of the current policy context at South Harbour. In particular, the policy support afforded by the LDP Policy B5 Aberdeen Harbour allocation (below) - which outlines a presumption in favour of harbour infrastructure and ancillary uses in the grey coloured area. However, this area is relatively confined and only really provides additional land to the east of Coast road (an extremely small area) and land at Gregness headland to the south of the South harbour.



6. Beyond this, the wider South Harbour area is also allocated as an Opportunity Site (Reference: Site OP 62 - dark blue polygon below). There is no specific policy requirement for such sites but the LDP suggests their allocation will 'give further detail and particulars of each site and their capabilities'. In this instance, OP 62 suggests that there is an opportunity within the larger 55 hectare area to provide for Aberdeen Harbour expansion.





Therefore, there are opportunities - supported by the adopted LDP - to extend functional and effective operational harbour related development into the wider areas covered by opportunity Site 62 (i.e. blue polygon) into St Fitticks Park, Girdleness (excluding the lighthouse and existing residential properties), Gregness and land to the south of Gregness, including land directly to the north of Doonies Farm.

Opportunity Site OP62 - Land at Gregness



7. In line with the current policy position, there is also support for 'essential infrastructure' (such as South Harbour and related works) within the Green Belt and Green Network LDP policy allocations (i.e. light green and green dotted areas) however development of other ancillary or industrial related uses outwith the Opportunity Site allocation would be much more problematic, and not supported in policy terms.

8. Therefore, we suggest that there is an opportunity for ACC to review the existing land use allocation within the LDP 2022 to support the release of Green Belt and Green Network allocations within Opportunity Site 62 and within potential development areas identified within the Bay of Nigg Development Framework (Years 0 – 15). This could facilitate the realisation of the strategic aspirations for the expansion of South Harbour and could implement infrastructure interventions identified within the Bay of Nigg Development Framework.

### The impact of 10-year LDPs

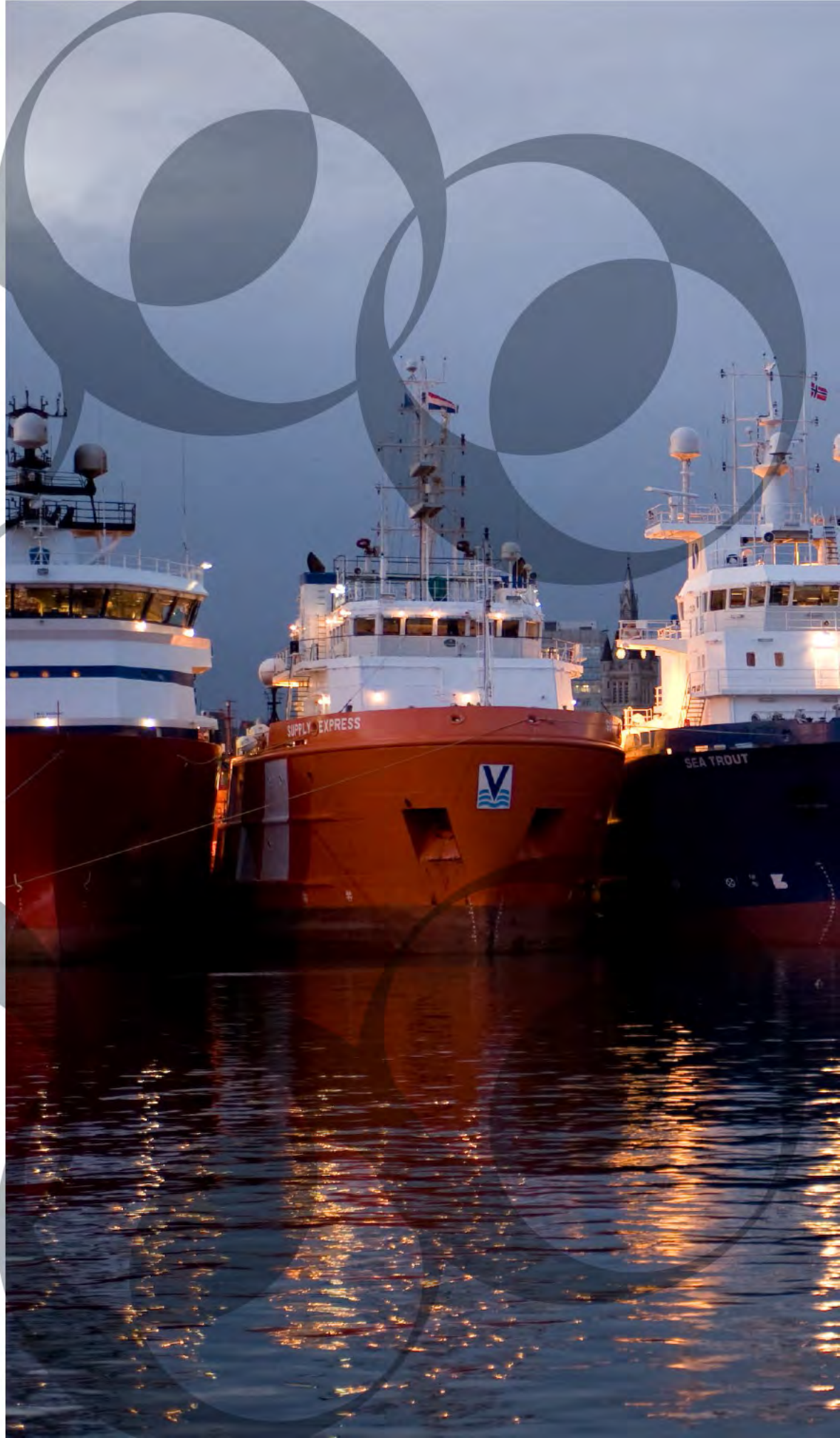
9. Our view is significantly, but not solely, driven by the likely introduction of 10 year LDPs within the emerging Planning Bill. **As such, if LDPs have a 10 year horizon, with 3-5 years to prepare, ACC's strategic aspirations and infrastructure delivery for the next 10-15 years must be considered now and included within the LDP 2022 to cover development aspirations until 2032 as there is unlikely to be an opportunity to reconsider such improvements every 5 years as it currently the case.**

### How can ACC address this?

5.3 In order to ensure that infrastructure delivery and redevelopment aspirations cover the aforementioned timescales appropriately, Aberdeen Harbour Board believe that **ACC's LDP 2022 should consider a longer term view on the proposed spatial growth strategy to allocate a generous supply of development land.** As such, Aberdeen Harbour Board considers that the most appropriate strategy to deliver the benefits of the South Harbour Expansion and realise the interventions sought by the Bay of Nigg Development Framework would be to:

- a) **Allocate redevelopment sites** around South Harbour within the LDP 2022 for their respective uses;
- b) **Identify the Bay of Nigg Development Framework interventions as Opportunity Sites** within the LDP2022;
- c) **Identify infrastructure aspirations** outlined within the Bay of Nigg Development Framework in the LDP 2022 Transport and Infrastructure policies.
- d) **Release existing green belt and green space network allocations** around South Harbour (Areas 1 & 2 within Chapter 4 of Aberdeen Harbour Board's 'Benefitting from Growth' document.
- e) This could be complemented by the **inclusion of the Bay of Nigg Development Framework delivery programme within the main body of the LDP** given that statutory Supplementary Guidance is likely to be phased out through the emerging Planning Bill.







## 06 | The Bigger Picture: A 20 Year One Harbour Vision

### An Invitation to Participate

6.1 Aberdeen Harbour Board are focussed on completing the construction of the South Harbour and responding to market demand for as much development land around the new facility as possible. That said, the successful operation of the One Harbour Strategy will lead to greater opportunities for change in the North. In time this could even be relative to the scale of change delivered around the South Harbour in the medium term.

6.2 We share ACC's vision to improve Aberdeen City Centre as a place to live, work and visit. We support the eight objectives set out in the City Centre Masterplan and in particular we agree that 'Revealing the Waterfront' can only improve Aberdeen for all of us who live and work there. Our charter means that we cannot do anything which may in any way impact upon the operation of the Harbour or the businesses who depend upon it. However, the creation of South Harbour and achieving constructive approach to the identification of development of land around it will create, for the first time, the breathing room to consider careful transformation of the North Harbour.

6.3 To this end, Aberdeen harbour Board has commissioned an Estates Masterplan, firstly to add detail to the proposals identified in the Bay of Nigg Development Framework and referenced in Section 3 (above) but secondly to begin the process of transforming land around the North Harbour. Our customers views will be central to this process. The safety and commercial success of our port will remain at the heart of our approach but this process will develop a vision for long term change that could, in time, transform the area of the City Centre between Regents Quay and Footdee.

6.4 Despite some reservations on exactly why the Bay of Nigg Development Framework has not been formally adopted as Supplementary Guidance, Aberdeen Harbour Board are keen to progress with the same broad group of consultees that led to its development. This varied group of stakeholders (perhaps with others added) was hugely helpful in the shaping of this important document. We will invite those parties into this process and based on the discussion over the next 12 months, will produce a draft Property Estates Strategy and Masterplan for consultation, effectively a set of strategic ambitions for Aberdeen Harbour Board's growth strategy going forward.

6.5 ACC will be absolutely central to that process as will the LDP 2022's intention for land around South Harbour. We look forward to meeting the LDP team and others to consider how together we transition between the current arrangements and the wider vision (above). The speed at which Aberdeen Harbour Board can secure a positive policy outcome through the LDP process is central to securing positive investment and subsequent redevelopment opportunities.



**BARTON  
WILLMORE**

Desktop Publishing by Barton Willmore.