

Public Document Pack



To: Councillor McRae, Convener; Councillor Bouse, Vice-Convener; and Councillors Alphonse, Boulton, Clark, Cooke, Copland, Farquhar, Lawrence, Macdonald, Radley, Tissera and Thomson.

Town House,
ABERDEEN 10 January 2024

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

The Members of the **PLANNING DEVELOPMENT MANAGEMENT COMMITTEE** are requested to meet in **Committee Room 2 - Town House on THURSDAY, 18 JANUARY 2024 at 10.00 am**. This is a hybrid meeting and Members may also attend remotely.

The meeting will be webcast and a live stream can be viewed on the Council's website. <https://aberdeen.public-i.tv/core/portal/home>

JENNI LAWSON
INTERIM CHIEF OFFICER – GOVERNANCE (LEGAL)

B U S I N E S S

MEMBERS PLEASE NOTE THAT ALL LETTERS OF REPRESENTATION ARE NOW AVAILABLE TO VIEW ONLINE. PLEASE CLICK ON THE LINK WITHIN THE RELEVANT COMMITTEE ITEM.

MOTION AGAINST OFFICER RECOMMENDATION

- 1.1. Motion Against Officer Recommendation - Procedural Note (Pages 5 - 6)

DETERMINATION OF URGENT BUSINESS

- 2.1. Determination of Urgent Business

DECLARATION OF INTERESTS AND TRANSPARENCY STATEMENTS

- 3.1. Members are requested to intimate any declarations of interest or connections

MINUTES OF PREVIOUS MEETINGS

- 4.1. Minute of Meeting of the Planning Development Management Committee of 7 December 2023 - for approval (Pages 7 - 14)

COMMITTEE PLANNER

- 5.1. Committee Planner (Pages 15 - 18)

REFERRALS FROM COUNCIL, COMMITTEES AND SUB COMMITTEES

- 6.1. Referral from Council on 14 December 2023 - Aberdeen Planning Guidance - Energy Transition Zone Draft Masterplan Consultation responses - COM/23/382 (Pages 19 - 300)

GENERAL BUSINESS

WHERE THE RECOMMENDATION IS ONE OF APPROVAL

- 7.1. Detailed Planning Permission for the Change of use from class 4 (office) to class 7 (guest house) - 18 Bon Accord Square Aberdeen (Pages 301 - 308)

Planning Reference – 231179

All documents associated with this application can be found at the following link and enter the reference number above:-

[Link.](#)

Planning Officer: Gavin Clark

OTHER REPORTS

- 8.1. Draft Aberdeen Planning Guidance: Short-term Lets - PLA/24/013 (Pages 309 - 328)

DATE OF NEXT MEETING

- 9.1. Thursday 15 February 2024 - 10am

Integrated Impact Assessments related to reports on this agenda can be viewed [here](#)

To access the Service Updates for this Committee please click [here](#)

Website Address: aberdeencity.gov.uk

Should you require any further information about this agenda, please contact Lynsey McBain, Committee Officer, on 01224 067344 or email lymcbain@aberdeencity.gov.uk

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Agenda Item 1.1

Members will recall from the planning training sessions held, that there is a statutory requirement through Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 for all planning applications to be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise. All Committee reports to Planning Development Management Committee are evaluated on this basis. It is important that the reasons for approval or refusal of all applications and any conditions to be attached are clear and based on valid planning grounds. This will ensure that applications are defensible at appeal and the Council is not exposed to an award of expenses.

Under Standing Order 29.11 the Convener can determine whether a motion or amendment is competent and may seek advice from officers in this regard. With the foregoing in mind the Convener has agreed to the formalisation of a procedure whereby any Member wishing to move against the officer recommendation on an application in a Committee report will be required to state clearly the relevant development plan policy(ies) and/or other material planning consideration(s) that form the basis of the motion against the recommendation and also explain why it is believed the application should be approved or refused on that basis. The Convener will usually call a short recess for discussion between officers and Members putting forward an alternative to the recommendation.

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PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

ABERDEEN, 7 December 2023. Minute of Meeting of the PLANNING DEVELOPMENT MANAGEMENT COMMITTEE. Present:- Councillor McRae, Convener; Councillor Bouse, Vice-Convener; and Councillors Boulton, Clark, Cooke, Copland, Farquhar, Henrickson (as substitute for Councillor Alphonse), Lawrence, Macdonald, Malik (as substitute for Councillor Tissera), Radley and Thomson.

The agenda and reports associated with this minute can be found [here](#).

Please note that if any changes are made to this minute at the point of approval, these will be outlined in the subsequent minute and this document will not be retrospectively altered.

MINUTE OF MEETING OF THE PLANNING DEVELOPMENT MANAGEMENT COMMITTEE OF 2 NOVEMBER 2023

1. The Committee had before it the minute of the previous meeting on 2 November 2023, for approval.

The Committee resolved:-

to approve the minute as a correct record.

MINUTE OF MEETING OF THE PLANNING DEVELOPMENT MANAGEMENT COMMITTEE (VISITS) OF 8 NOVEMBER 2023

2. The Committee had before it the minute of the Planning Development Management Committee (visits) minute of 8 November 2023, for approval.

The Committee resolved:-

to approve the minute as a correct record.

COMMITTEE PLANNER

3. The Committee had before it the committee business planner, as prepared by the Interim Chief Officer – Governance (Legal).

The Committee resolved:-

- (i) to request that officers highlight in the planner, if a planning application had been to the Pre Application Forum or subject to a Pre-Determination Hearing before coming to Planning Development Management Committee; and
- (ii) to note the planner.

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

26 RUBISLAW DEN NORTH ABERDEEN - DETAILED PLANNING PERMISSION - 230655

4. The Committee had before it a report by the Chief Officer – Strategic Place Planning, **which recommended:-**

That the application for Detailed Planning Permission for the erection of a single storey extension, formation of patio, external steps, window/door replacement to rear; and installation of two new gates to front at 26 Rubislaw Den North Aberdeen, be approved subject to the following conditions:-

Conditions**(01) DURATION OF PERMISSION**

The development to which this notice relates must be begun not later than the expiration of 3 years beginning with the date of this notice. If development has not begun at the expiration of the 3-year period, the planning permission lapses.

Reason – In accordance with section 58 (duration of planning permission) of the 1997 act.

(02) TREE PROTECTION

No works in connection with the development hereby approved shall commence unless a tree protection plan has been submitted to and approved in writing by the planning authority. Tree protection measures shall be shown on a layout plan accompanied by descriptive text and shall include:

- (a) The location of the trees to be retained and their root protection areas and canopy spreads (as defined in BS 5837: 2012 Trees in relation to design, demolition and construction);
- (b) The position and construction of protective fencing around the retained trees (to be in accordance with BS 5837: 2012 Trees in relation to design, demolition and construction);
- (c) The extent and type of ground protection, and any additional measures required to safeguard vulnerable trees and their root protection areas.

No works in connection with the development hereby approved shall commence unless the tree protection measures have been implemented in full in accordance with the approved tree protection plan. No materials, supplies, plant, machinery, soil heaps, changes in ground levels or construction activities shall be permitted within the protected areas without the written consent of the planning authority and no fire shall be lit in the position where the flames could extend to within 5 metres of foliage, branches or trunks. The approved tree protection measures shall be retained in situ until the development has been completed.

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

Reason – In order to ensure adequate protection for the trees on site during the construction of the development.

(03) MATERIALS

No works in connection with the development hereby approved shall commence unless a sample and details of the specification and colour of all the wall and roof materials, to be used in the external finish for the approved development have been submitted to and approved in writing by the planning authority. The extension shall not be brought into use unless the external finish has been applied in accordance with the approved details.

Reason – In order to safeguard the special architectural character and historic interest of this listed building and in the interests of preserving or enhancing the character or appearance of the conservation area.

(04) GATE DETAIL

Prior to the commencement of the development hereby approved an elevation drawing of the proposed gates to be located on the south elevation, as indicated on Drawing No. 315P - 301B, shall be submitted to and approved in writing by the planning authority. Thereafter, the gates shall be installed in accordance with the approved details.

Reason – In order to maintain the character and amenity of the surrounding residential area, safeguard the special architectural character and historic interest of this listed building and in the interests of preserving or enhancing the character or appearance of the conservation area.

The Committee heard from Rebecca Kerr, Planner, who spoke in furtherance of the application and answered various questions from Members.

The Committee then heard from James Halliday, owner of a neighbouring property, who spoke against the application and asked that the application be refused.

The Committee then heard from George Stewart, applicant, who spoke in support of the application.

The Committee resolved:-

to approve the application conditionally.

26 RUBISLAW DEN NORTH ABERDEEN - LISTED BUILDING CONSENT - 230654

5. The Committee had before it a report by the Chief Officer – Strategic Place Planning, **which recommended:-**

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

That the application for Listed Building Consent for the erection of a single storey extension, formation of patio, external steps, window/door replacement to rear; and installation of two new gates to front at 26 Rubislaw Den North Aberdeen, be approved subject to the following conditions:-

Conditions**(01) MATERIALS**

No works in connection with the development hereby approved shall commence unless a sample and details of the specification and colour of all the wall and roof materials, to be used in the external finish for the approved development have been submitted to and approved in writing by the planning authority. The extension shall not be brought into use unless the external finish has been applied in accordance with the approved details.

Reason – In order to safeguard the special architectural character and historic interest of this listed building and in the interests of preserving or enhancing the character or appearance of the conservation area.

(02) GATE DETAIL

Prior to the commencement of the development hereby approved an elevation detail drawing of the proposed gates to be located on the south elevation, as indicated on Drawing No. 315P - 301B, shall be submitted to and approved in writing by the planning authority. Thereafter, the gates shall be installed in accordance with the approved details.

Reason – In order to maintain the character and amenity of the surrounding residential area, safeguard the special architectural character and historic interest of this listed building and in the interests of preserving or enhancing the character or appearance of the conservation area.

(03) GRANITE REUSE

No development shall take unless details of and a methodology statement for the reuse of the granite down takings in the construction/ finishing of the new development have been submitted to and approved in writing by the planning authority. Thereafter prior to the development hereby approved being brought into use, the details as agreed shall be implemented in full.

Reason – In the interests of retaining historic granite on the site and ensuring compliance with Policy D7 (Our Granite Heritage) of the Aberdeen Local Development Plan 2023 and in the interest of preserving the special character and setting of the Albyn Place and Rubislaw Conservation Area.

The Committee heard from Rebecca Kerr, Planner, who spoke in furtherance of the application and answered various questions from Members.

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

The Committee then heard from James Halliday, owner of a neighbouring property, who spoke against the application and asked that the application be refused.

The Committee then heard from George Stewart, applicant, who spoke in support of the application.

The Committee resolved:-

to approve the application conditionally.

8 ALBURY MANSIONS ABERDEEN - 231157

6. The Committee had before it a report by the Chief Officer – Strategic Place Planning, **which recommended:-**

That the application for Detailed Planning Permission for the change of use of flat to Short Term Let accommodation (sui generis) with maximum occupancy of 4 people (Retrospective) at 8 Albury Mansions Aberdeen, be approved subject to the following conditions:-

Conditions

(01) DURATION OF PERMISSION

The development to which this notice relates must be begun not later than the expiration of 3 years beginning with the date of this notice. If development has not begun at the expiration of the 3-year period, the planning permission lapses.

Reason - in accordance with section 58 (duration of planning permission) of the 1997 act.

(2) TIME LIMIT FOR SHORT-TERM LET USE

The hereby approved use of the property as Short-Term Let accommodation shall expire 5 years following the date of the grant of permission as stated on this notice, unless a further planning permission has been granted for continued use of the property as Short-Term Let accommodation in the meantime. Should no further planning permission be granted then the property shall revert to mainstream residential use as a flat after the aforementioned 5-year period.

Reason: In order to allow the local housing need and demand situation and the local economic benefits derived from the use of the property as a Short Term Let to be reassessed in 5 years' time, to ensure that the loss of the property as residential accommodation would remain compliant with Policy 30 of NPF4.

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

The Committee heard from Samuel Smith, Planner, who spoke in furtherance of the application and answered various questions from Members.

The Committee then heard from Aileen Taylor and David Robertson, who both spoke against the proposed application and objected to the application.

The Convener moved, seconded by the Vice Convener:-

That the application be approved conditionally in line with the officer's recommendation.

Councillor Boulton moved as an amendment, seconded by Councillor Farquhar:-

That the application be refused for the following reasons.

1. The use of the property as a Short Term Let (STL) had a significant detrimental impact on the amenity of the immediate neighbouring residential properties within the application building beyond what would typically be expected if it were to be used as mainstream residential accommodation. This would be contrary to Policy H1 (Residential Areas) of the Aberdeen Local Development Plan (ALDP) 2023 and Policy 30 (Tourism) paragraph e(1) of National Planning Framework 4. It was considered that the location of the proposal as an STL as a tourism use was not within the city centre or land allocated to tourism related use which was a requirement of Policy VC2 of the ALDP 2023.
2. The proposal which was also identified as having the possibility to cause harm to the existing residents in the residential area was not considered to have met the locational requirements and was therefore contrary to policy VC2 (Tourism and Culture) of the ALDP 2023.

On a division, there voted – for the motion (8) – the Convener, the Vice Convener and Councillors Cooke, Copland, Henrickson, Macdonald, Malik and Radley – for the amendment (5) – Councillors Boulton, Clark, Farquhar, Lawrence and Thomson.

The Committee resolved:-

to adopt the motion and therefore approve the application conditionally.

UPPER BIRCHWOOD, 1 SOUTH AVENUE ABERDEEN - 231263

7. The Committee had before it a report by the Chief Officer – Strategic Place Planning, **which recommended:-**

That the application for Detailed Planning Permission for the erection of a shed to the front (retrospective), at upper Birchwood, 1 South Avenue Aberdeen, be approved subject to the following condition:-

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

Condition

(01) DURATION OF PERMISSION

The development to which this notice relates must be begun not later than the expiration of 3 years beginning with the date of this notice. If development has not begun at the expiration of the 3-year period, the planning permission lapses.

Reason - in accordance with section 58 (duration of planning permission) of the 1997 act.

The Committee heard from Roy Brown, Planner, who spoke in furtherance of the application and answered various questions from Members.

The Committee then heard from Madina Kurmanbaeva who lived in one of the neighbouring properties, who objected to the proposed application and asked that the application be refused.

The Convener moved, seconded by Councillor Copland:-

That the application be approved conditionally in line with the officer's recommendation.

Councillor Boulton moved as an amendment, seconded by Councillor Cooke:-

That the application be refused for the following reasons:-

1. That the proposal would be contrary to Policy 16 (Quality Homes) of National Planning Framework 4 and Policy H1 (Residential Areas) and D2 (Amenity) of the Aberdeen Local Development Plan due to the adverse impact it would have on the amenity and privacy resulting from the proximity of the shed of adjoining residential properties and the ground floor flat in particular; and
2. That the proposal would be contrary to Policy 14 (Design, Quality and Place) of NPF4 and Policy D1 (Quality Placemaking) of the Aberdeen Local Development Plan in that the design, scale, and prominent siting of the shed would adversely affect the character, visual amenity and landscape setting of the residential building to which it relates.

On a division, there voted – for the motion (3) – the Convener and Councillors Copland and Macdonald – for the amendment (10) – the Vice Convener and Councillors Boulton, Cooke, Clark, Farquhar, Henrickson, Lawrence, Malik, Radley and Thomson.

The Committee resolved:-

to adopt the amendment and therefore refuse the application.

PLANNING DEVELOPMENT MANAGEMENT COMMITTEE

7 December 2023

REPRESENTATION PROCEDURE - GOV/23/317

8. The Committee had before it a report by the Chief Officer – Strategic Place Planning, which provided an update on the operation of the representation procedure which was approved by Planning Development Management Committee (PDMC) on 3 November 2022 and sought approval for the procedure to be updated as outlined at 3.2 of the report.

The report recommended:-

that the Committee –

- (a) notes how the representation procedure had operated since December 2022;
- (b) approves the updated Procedure and Guidance notes at Appendix 1;
- (c) notes that the updated Procedure and Guidance notes would take effect from after today's meeting and would apply to all future Planning Development Management Committees;
- (d) instructs the Chief Officer – Strategic Place Planning to keep the Procedure and Guidance notes under review and to make any minor amendments which were deemed necessary; and
- (e) instructs the Chief Officer – Strategic Place Planning to report back to the Committee after 12 months if any material changes were required to the Procedure and/or Guidance notes.

The Committee heard from Fiona Closs, Solicitor, who spoke in furtherance of the report and answered questions from Members.

The Committee resolved:-

- (i) to agree that the data in regards to amount of speakers be included in future annual effectiveness reports;
 - (ii) if any future review of the procedure takes place, to seek feedback from individuals who have participated in the procedure to date and to include this feedback in any future review; and
 - (iii) to approve the recommendations.
- **Councillor Ciaran McRae, Convener**

| | A | B | C | D | E | F | G | H | I |
|----|---|---|-------------------|-----------------|--------------------------|-------------|--------------------|---|--|
| 1 | PLANNING DEVELOPMENT MANAGEMENT COMMITTEE BUSINESS PLANNER The Business Planner details the reports which have been instructed by the Committee as well as reports which the Functions expect to be submitting for the calendar year. | | | | | | | | |
| 2 | Report Title | Minute Reference/Committee Decision or Purpose of Report | Update | Report Author | Chief Officer | Directorate | Terms of Reference | Delayed or Recommended for removal or transfer, enter either D, R, or T | Explanation if delayed, removed or transferred |
| 3 | | | 18 January 2024 | | | | | | |
| 4 | 18 Bon Accord Square - 231179 | To approve or refuse the application for change of use from class 4 (office) to class 7 (guest house) | On agenda | Gavin Clark | Strategic Place Planning | | 1 | | |
| 5 | Draft Planning Guidance - Short Term Let for Consultation | To ask for approval to go out for consultation on a draft planning guidance on Short Term Lets | On agenda | David Berry | Strategic Place Planning | | 5 | | |
| 6 | Aberdeen Planning Guidance - Energy Transition Zone Draft Masterplan Consultation Responses | At the Council meeting on 14 December 2023, it was agreed to refer the report to the Planning Development Management Committee on 18 January 2024 | On agenda | Laura Robertson | Strategic Place Planning | | 5 | | |
| 7 | | | 15 February 2024 | | | | | | |
| 8 | | | | | | | | | |
| 9 | | | 14 March 2024 | | | | | | |
| 10 | | | 18 April 2024 | | | | | | |
| 11 | | | 16 May 2024 | | | | | | |
| 12 | | | 20 June 2024 | | | | | | |
| 13 | | | 22 August 2024 | | | | | | |
| 14 | | | 19 September 2024 | | | | | | |

| | A | B | C | D | E | F | G | H | I |
|----|---|--|---|----------------|--------------------------|-------------|--------------------|---|--|
| | Report Title | Minute Reference/Committee Decision or Purpose of Report | Update | Report Author | Chief Officer | Directorate | Terms of Reference | Delayed or Recommended for removal or transfer, enter either D, R, or T | Explanation if delayed, removed or transferred |
| 2 | | | | | | | | | |
| 15 | | | 07 November 2024 | | | | | | |
| 16 | | | 05 December 2024 | | | | | | |
| 17 | Draft Aberdeen Guidance - Wind Turbine | At the Council meeting on 3 November 2023, it was agreed to instruct the Chief Officer - Strategic Place Planning to update the draft Aberdeen Planning Guidance on Wind Turbine Development in light of consultation responses received and the policy shift within NPF4 and incorporate it within draft Aberdeen Planning Guidance on Renewable Energy Development, a draft of which should be reported to the Planning Development Management Committee within 12 months. | | David Dunne | Strategic Place Planning | Place | 5 | | |
| 18 | | | Future applications to PDMC (date of meeting yet to be finalised. | | | | | | |
| 19 | Summerhill Church Stronsay Drive - 220990 | To approve or refuse the application for redevelopment of church and manse site for residential development (14 dwellings) | | Lucy Greene | Strategic Place Planning | Place | 1 | | |
| 20 | Land At Greenferns Sites OP28 & OP33 | To approve or refuse the application for Residential-led, mixed use development comprising approximately 1,650 homes, employment use, a neighbourhood centre comprising local retail and commercial provision, leisure and community uses and associated infrastructure including new and upgraded access roads, landscaping, open space and engineering works | | Gavin Clark | Strategic Place Planning | Place | 1 | | |
| 21 | Woodend - Culter House Road - 210889 | To approve or refuse the application for erection of 19no. self-build dwelling houses with associated landscaping, access and infrastructure | | Dineke Brasier | Strategic Place Planning | Place | 1 | | |
| 22 | Rosehill House, Ashgrove Rd West - 230414 | To approve or refuse the application for McDonald's Restaurant with drive thru | | Lucy Greene | Strategic Place Planning | Place | 1 | | |

| | A | B | C | D | E | F | G | H | I |
|----|--|--|--------|----------------|--------------------------|-------------|--------------------|---|--|
| | Report Title | Minute Reference/Committee Decision or Purpose of Report | Update | Report Author | Chief Officer | Directorate | Terms of Reference | Delayed or Recommended for removal or transfer, enter either D, R, or T | Explanation if delayed, removed or transferred |
| 2 | | | | | | | | | |
| 23 | Waterton House Abereen - 230297 | To approve or refuse the application for PPP for 16 residential plots | | Lucy Greene | Strategic Place Planning | Place | 1 | | |
| 24 | Aberdeen Grammar School FP's Club, 86 Queens Road - 211806 | To approve or refuse the application for erection of 3no. villas, 4no. apartments and 2no. maisonette apartments with associated works | | Jane Forbes | Strategic Place Planning | Place | 1 | | |
| 25 | Land at Persley Croft, Parkway - 231134 | To approve or refuse the application for Battery energy storage system (BESS) development with a capacity up to 49.9MW including erection of welfare unit, substation and fencing; demolition of an existing buildings and associated Infrastructure | | Matthew Easton | Strategic Place Planning | Place | 1 | | |
| 26 | Pitmedden Road - 231498 | To approve or refuse the application for installation of Security Fencing / Gates (Retrospective) | | Robert Forbes | Strategic Place Planning | Place | 1 | | |
| 27 | Oscar Road Torry - 231300 | To approve or refuse the application for erection of 20 dwellings (12 houses and 8 flats) | | Robert Forbes | Strategic Place Planning | Place | 1 | | |
| 28 | Land at Rigifa, Cove Road - 231336 | To approve or refuse the application for the erection of battery storage units with associated infrastructure, control building, switch room, inverter containers, lighting, fencing and associated works including access road | | Gavin Clark | Strategic Place Planning | Place | 1 | | |
| 29 | 693 George Street - 231018 | To approve or refuse the application for change of use from Class 1A to hot-food takeaway | | Alex Ferguson | Strategic Place Planning | Place | 1 | | |
| 30 | APG: Health Impact Assessments | To ask to consult | | Donna Laing | Strategic Place Planning | Place | 5 | | |

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COUNCIL

14 DECEMBER 2023

ABERDEEN PLANNING GUIDANCE - ENERGY TRANSITION ZONE DRAFT MASTERPLAN CONSULTATION RESPONSES - COM/23/382

With reference to Article 6 of the minute of its meeting of 11 September 2023, the Council had before it a report by the Chief Officer - Strategic Place Planning which presented an updated Energy Transition Zone Masterplan, which took into account the findings of the eight week public consultation, and sought agreement on the document becoming Aberdeen Planning Guidance to support the Aberdeen Local Development Plan 2023.

The report recommended:-

that the Council -

- (a) note the consultation responses received, and agree the changes proposed by officers to the Draft Energy Transition Zone Masterplan (Appendix 2); and
- (b) agree the content of the Energy Transition Zone Masterplan 2023, as amended, (Appendix 1) as non-statutory Aberdeen Planning Guidance to support the Aberdeen Local Development Plan 2023.

The Council resolved:-

- (i) to suspend Standing Order 42.1; and
- (ii) to refer the report to the Planning Development Management Committee on 18 January 2024.

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ABERDEEN CITY COUNCIL

| | |
|---------------------------|---|
| COMMITTEE | Planning Development Management Committee |
| DATE | 18 January 2024 |
| EXEMPT | No |
| CONFIDENTIAL | No |
| REPORT TITLE | Aberdeen Planning Guidance - Energy Transition Zone Draft Masterplan Consultation responses |
| REPORT NUMBER | COM/23/382 |
| DIRECTOR | Gale Beattie |
| CHIEF OFFICER | David Dunne |
| REPORT AUTHOR | Laura Robertson |
| TERMS OF REFERENCE | 21 |

1. PURPOSE OF REPORT

- 1.1 This report presents an updated Energy Transition Zone Masterplan, taking into account the findings of the eight week public consultation, and seeks agreement on the document becoming Aberdeen Planning Guidance to support the Aberdeen Local Development Plan 2023.

2. RECOMMENDATIONS

That Council:

- 2.1 Note the consultation responses received, and agree the changes proposed by officers to the Draft Energy Transition Zone Masterplan (Appendix 2).
- 2.2 Agree the content of the Energy Transition Zone Masterplan 2023, as amended, (Appendix 1) as non-statutory Aberdeen Planning Guidance to support the Aberdeen Local Development Plan 2023.

3. CURRENT SITUATION

- 3.1 The Aberdeen Local Development Plan (ALDP) 2023 was adopted on 16 June 2023. The ALDP 2023 contains Policy B5 - Energy Transition Zone, which identifies three areas of land allocated as OP56 (St Fittick's Park), OP61 (Doonies) and OP62 (Bay of Nigg / Gregness). The ALDP 2023 sets out that OP56 and OP61 will support renewable energy transition related industries in association with Aberdeen South Harbour, while OP62 largely relates to the Aberdeen South Harbour expansion. The ALDP 2023 also highlights the need for a joint Masterplan for all three of the sites. This is what the Energy Transition Zone (ETZ) Masterplan seeks to do, with the intention of becoming adopted by Aberdeen City Council as non-statutory Aberdeen Planning Guidance (APG). If adopted as APG, the Masterplan will be used by the Planning Authority in assessing any development proposals on the aforementioned sites. The ETZ Masterplan has been prepared by a consultant team on behalf of ETZ Ltd.

- 3.2 On 29 June 2023, the Draft ETZ Masterplan was reported to the Planning Development Management Committee to seek agreement for officers to carry out public consultation on the document.

The Committee agreed to:

- Endorse the content of the Draft Energy Transition Zone (ETZ) Masterplan;
- Instruct the Chief Officer – Strategic Place Planning to, subject to any minor drafting changes, publish the Draft ETZ Masterplan for an eight week period instead of six weeks of non statutory public consultation;
- Instruct the Chief Officer – Strategic Place Planning to report the outcomes of the public consultation and any proposed revisions to the Draft ETZ Masterplan to a subsequent Planning Development Management Committee within the next six months.

- 3.3 At Planning Development Management Committee on 21 September 2023, the following resolution of Full Council, of 11 September 2023, was submitted for consideration:

“To recommend to the Planning Development Management Committee that any future reports of the Energy Transition Zone (ETZ) Masterplan be reported to the earliest appropriate meeting of Full Council.”

Committee resolved, following a division, to approve the resolution, and therefore agreed that any future reports on the ETZ Masterplan be reported to the earliest appropriate meeting of Full Council, hence the purpose of this report.

- 3.4 Appendix 1 contains the updated Energy Transition Zone Masterplan in a ‘red text edit’ version, whereby suggested changes to the previously considered document are highlighted in red for ease of reference. This red text, if the content is agreed, would be altered to black for final publication. A summary of the representations received, officers’ responses to these representations, and details of any resulting action as a result of the consultation are contained in Appendix 2. Appendix 3 is the Habitats Regulations Assessment (HRA). Due their volume, full, un-summarised copies of representations are available in the members’ share point site.

Background and the Draft Masterplan

- 3.5 The ETZ Masterplan (Appendix 1) has been prepared in accordance with the Council’s ‘Aberdeen Placemaking Process’ Aberdeen Planning Guidance (formerly the ‘Masterplanning Process’). The format and the content of the document is as follows:

- Explains the strategic context and need;
- Identifies the engagement and consultation that has taken place;
- Looks at the study area and identifies land ownership, policy, existing communities and social demographics, environmental, biodiversity and landscape, landscape character, flood risk, cultural heritage, infrastructure,

- development infrastructure and community infrastructure and local development considerations;
- Splits the document into campuses – Community and Energy Coast, Marine Gateway, Hydrogen Campus, Offshore Wind Campus, Innovation Campus, Skills Campus; and
- Finally, it considers supporting infrastructure and Masterplan delivery.

3.6 Further detail on the background to the Draft Masterplan was provided within the report to the Planning Development Management Committee of 29th June 2023 and can be found via this link: [PLA.23.210 PDMC report](#)

Consultation Process

3.7 Consultation on the ETZ Masterplan has been undertaken by ETZ Ltd and their consultants on development of the document (and the subsequent Planning Applications), and by officers as part of the instruction by the Planning Development Management Committee to consult publicly on the content of the Draft Masterplan.

Consultation on ETZ Masterplan carried out by Ironside Farrar on behalf of ETZ Ltd

3.8 During the preparation of the Masterplan, ETZ Ltd and Ironside Farrar carried out stakeholder engagement over a number of months. Details of these events, including feedback and amendments, are set out within the 'Engagement & Consultation' section of the Masterplan (Appendix 1, pages 7 to 16). Specific engagement included:

- Meeting with Torry Partnership and site walkover November 2021;
- Public exhibition, December 2021;
- Meeting with local GPs, February 2022;
- Site walk about with members of the local community, April 2022;
- Cove Community Council meeting and public exhibition, May 2022;
- Public exhibition, November 2022;
- Meeting with Lochside Academy teachers, August 2023, to consider future engagement opportunities;

A communications officer has also been appointed by ETZ Ltd to allow engagement to continue throughout the planning process.

3.9 Further to the consultation on the ETZ Masterplan, ETZ Ltd and Ironside Farrar also undertook pre-application public consultation prior to submitting an application for Planning Permission in Principle to the Planning Authority (validated on 1 November 2023). This consultation involved:

- Event 1, held on 29 June 2023 at Torry United Free Church that 42 people attended. Although principally relating to the planning application, the event also included an update on the Masterplan process with a link to view the Draft Document and information on how comment could be provided to the Council's period of public consultation (discussed further below);
- Event 2, held on 3rd August 2023 also at the Torry United Free Church;

Both events were advertised by ETZ Ltd and Ironside Farrar through a flyer drop to local households in the Torry, Balnagask and Cove areas (c. 9,000 households in total). The event was also publicised via email to all those who had attended previous Masterplan consultation events and left their contact details, as well as to a range of local community groups.

Draft Energy Transition Zone Masterplan Consultation by Aberdeen City Council Planning Authority

- 3.10 Following the instructions from Planning Development Management Committee on 29 June 2023, the Planning Authority undertook public consultation on the Draft ETZ Masterplan for eight weeks from 5 July 2023 until 30 August 2023. The eight week period reflected the consultation being undertaken over the summer holiday period. A half page, coloured newspaper article was published in the Evening Express on 5 July 2023 advertising the consultation, setting out where to find the material online and how comments could be submitted, including online, by email and letter.
- 3.11 The Draft Masterplan was publicly available and advertised as follows:
- Paper copies of the document were available in 9 locations during their opening hours - Marischal College (main reception), Torry Library, Torry Medical Centre, Tullos Swimming Pool (reception), Kincorth Library, Cove Library, Cove Bay Medical Centre, North East Scotland College Altens Campus (reception) and Old Torry Community Centre.
 - The document was published on Aberdeen City Council's 'Consultation Hub -' <https://consultation.aberdeencity.gov.uk/>.
 - A notification email was issued to internal and external statutory consultees, including Community Councils, on 5 July 2023 to advise them of the consultation, with a reminder email sent on 9 August 2023.
 - The lead planning officer's email address was made available to consultees to allow direct correspondence to be submitted and for any queries on the Masterplan or consultation process to be answered.
- 3.12 A total of 641 responses were received during the consultation period. These can be broken down into 251 responses received online via the consultation hub (Citizen Space), 388 received by email and two by post. In analysing responses made via the online consultation hub we can tell that 112 of response made through the Citizen Space were local to the area and 81 were local to the wider Aberdeen area. Those that responded by email and post did not necessarily provide this information but those that did included a large number of AB postcodes.
- 3.13 The table below sets out a summary of the responses received on the Draft ETZ Masterplan, and responses by Officers to the points made. A more detailed summary is provided in Appendix 2:

| Comment Received | Officer Response |
|---|--|
| <p>Support the ETZ and its objectives and the move towards energy transition and away from oil and gas. Welcome working towards ensuring the achievement of Net Zero and climate change goals is key and ensure Aberdeen and the North East's position as the North Sea energy hub.</p> | <p>Comments noted</p> |
| <p>Impacts on essential road network during and post completion, including Coast Road, to ensure no further impact on residents. Some roads already difficult at peak times.</p> <p>Will cause traffic congestions, access and safety problems for residents and coast path users</p> | <p>This level of detail is not required at Masterplanning stage. An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward.</p> <p>The requirement for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue (p84, p108, p122, p132 and p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the Aberdeen South Harbour Link Road.</p> |
| <p>Adversely affects those with disabilities, including the proposed alternative open space at Tullos hill.</p> <p>Will adversely affect the needs of people with disabilities due to the loss and diminution of quality of accessible and inclusive existing pathways in the park.</p> | <p>The proposal includes improved access through St Fittick's Park to Tullos Hill. It is noted that the bridge will be removed but this is a consequence of a separate project to electrify the main east coast rail line and upgrade the Coast Road and is consequently under the control of Network Rail. Careful consideration will be given to allowing improved access for all, through the assessment of planning applications.</p> <p>Further path networks and improvements are shown for each area but in particular on the Marine Gateway. Though part of the site will be developed, there will be an extensive path network still available.</p> |
| <p>Will negatively impact on environmental health due to increased levels of air, noise and light pollution and impact on health and wellbeing.</p> | <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> |

| Comment Received | Officer Response |
|--|---|
| <p>Results in loss of public amenities, green space and recreation ground.</p> <p>Will negatively impact the environment, realignment of the Tullos burn, children play provision, loss of wildlife etc.</p> | <p>At the centre of the ETZ masterplan is the consideration of environment, biodiversity and landscape. The community and energy coast considers the East Tullos Burn and wetlands (p59 and 60). St Fittick's park and the projects that will be brought forward in this area, to the benefit of the community are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping.</p> <p>It is acknowledged that around 1/3 of the site will be built on and alterations will be made to the burn at its easterly end but a number of further studies and assessments, including an EIA and flood risk assessment are required as part of ongoing planning processes and will be fully assessed and considered through this route.</p> <p>The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, connectivity and community benefits, including a extended play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.</p> <p>Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan, as an appendix for clarity and the HRA made available for the Councils website.</p> |
| <p>Suggest development of Brownfield land in Altens and Tullos instead.</p> | <p>The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout, the masterplan states that brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses.</p> |
| <p>Lack of community consultation or listening to what the community want.</p> | <p>Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan (and summarised within this report). The main concerns raised by the community during consultation related to the allocation of the</p> |

| Comment Received | Officer Response |
|--|--|
| | <p>sites at St Fittick's and Doonies rather than community requirements or benefits.</p> <p>The allocation of the site is not for this Masterplan to consider, this was carried out via the Local Development Plan process (see paragraphs 3.15 and 3.16 below for explanation).</p> |
| <p>Masterplan does not fully acknowledge the impact on the park in terms of loss of amenity, including impact of lighting, loss of views and fences etc.</p> | <p>Detailed design and further assessments submitted with planning applications will consider the potential impact of elements such as light. This document sets out parameters and a framework for detailed proposals, but the design detail will be determined through the planning application process.</p> |
| <p>The masterplan should clearly show development constraints.</p> | <p>The site constraints are shown on plans from page 31 to 34 including flood risk and cultural heritage. There is also text throughout the document which considers opportunities and constraints of all campuses and areas, including p78 which talks about below ground Scottish Water infrastructure. This said the below ground infrastructure should be shown on a constraints plan along with any other similar constraints, making the document more useable. This has been updated in the Masterplan (also on page 78).</p> |
| <p>Concern with the height of the buildings.</p> | <p>The Masterplan sets parameters for development. Detail of building heights will be set out in subsequent planning applications, via studies such as Landscape and Visual Impact Assessments.</p> |
| <p>Concern with lack of information about uses.</p> | <p>At this time the end user is not known for the area. It is entirely appropriate for a Masterplan to provide this level of detail. The Masterplan sets principles and parameters that will be taken forward with any planning applications.</p> |
| <p>Insufficient compensatory replacement planting.</p> | <p>The Masterplan illustrates the location and area of landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood.</p> <p>A section has also been added to the Masterplan stating: "development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover."</p> |

| Comment Received | Officer Response |
|--|---|
| Concern with impact on health in particular given Torry is a deprived area and that no Health Impact Assessment has been undertaken or requested. | A Health Impact Assessment will be provided as part of the planning application process. |
| Opportunity to enhance active travel in the area. | Such opportunities are included in the Masterplan and will be developed further as part of the planning application process. One of the Masterplan's strategic objectives is to deliver a green network for walking, cycling and enhanced community facilities. |
| Inconsistent and contrary to National and local planning policy, including Scottish Government policy to prioritise peoples' wellbeing and nature recovery. | The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation. |
| Concern with these industrial uses in close proximity to housing. | Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. |
| Document is too high level, should not just be speculative development at St Fitticks. | The Masterplan sets principles and parameters that will be taken forward with any planning applications. Its objectives are to provide a series of strategic design and development principles to guide the most appropriate forms of development and uses for the area in accordance with the allocation. The design detail for each area will be determined through the planning application process. |
| Object to development of St Fittick's Park (OP56), loss of wildlife, amenity, biodiversity, loss of only greenspace left in Torry, impact on mental health, loss of wetland. | <p>The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).</p> <p>The document sets out on page 167 the further assessments that are required for planning applications including an EIA.</p> |

| Comment Received | Officer Response |
|---|---|
| | Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the Masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan for clarity and the HRA available for the Councils website. |
| Require all the relevant assessments to take place. | Noted, the Masterplan identifies a number of assessments as part of the planning application process. |
| Identify mitigation requirements more clearly. | The masterplan sets out phasing of applications and linked Strategic Mitigation & Compensation Measures (identified through Masterplan) on pages 158-172 of the draft Masterplan. It also states that planning obligations will be agreed with ACC through planning application assessment and as such will be secured through planning conditions and/or a legal agreement. |
| Some technical points and wording changes. | These have been addressed by the proposed updates to the Masterplan. |
| Development will impact on St Fittick's Church. | The impact on St Fitticks Church and Graveyard has been considered. Additional surveys and assessments will be required to ensure no physical damage is caused during development the setting of the church was altered a number of years ago. Historic Environment Scotland (HES) and the Council's archaeologist have been involved throughout the process. Further assessments and consultation with HES will be required as part of the planning process. |

3.14 Of the emails received to the consultation, 365 were a duplicated standard response, requesting the removal of Opportunity Site 56 St Fittick's Park from the ETZ and that the draft Masterplan be amended accordingly. There have also been a number of representations requesting that Doonies (OP61) not be built on. In response to this point it is a matter of the principle of development on allocated ALDP 2023 sites:

3.15 Proposals for an ETZ at St Fittick's Park and Doonies first emerged in the Proposed Local Development Plan 2020 (PLDP) which was approved at Full Council on 2 March 2020. A public consultation was held on the PLDP from 20 May 2020 to 31 August 2020. The Council received 220 representations on the ETZ proposals at St Fittick's Park and Doonies. These were considered by independent reporters at an Examination who issued a Report into the Examination in September 2022. The Report recommended a number of additional requirements for a Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones. Importantly however, the Report recommended retaining the proposals for Energy Transition Zones at OP56 St Fittick's Park

and OP61 Doonies/Gregness. The Council accepted all the Reporter's recommendations in December 2022 and the ALDP 2023 was formally adopted on 19th June 2023.

- 3.16 The principle of developing OP56 St Fittick's Park and OP61 Doonies for energy transition uses has therefore been accepted in the adopted ALDP 2023. However, the ALDP 2023 also requires a joint Masterplan for OP56 St Fittick's Park, OP61 Doonies and OP62 Aberdeen South Harbour and outlines some of the issues that need to be considered within the Masterplan. It is this Masterplan which is subject to the current consultation. If the Masterplan is approved, any development of the sites would then require planning consent. This will require planning applications which in turn will be open for further public scrutiny and comment.

Health Impact Assessment

- 3.17 There is currently no national or local guidance that sets out at what stage in the planning process, or by whom, a Health Impact Assessment should be carried out. In this case a Health Impact Assessment is required and has been requested by the Planning Authority to be considered as part of the planning application process.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no financial implications associated with this report. The cost of preparing the ETZ Masterplan document has been met by ETZ Ltd and produced by Ironside Farrar on their behalf.
- 4.2 The Masterplan will front-load any planning issues and ultimately benefit future officer involvement and time in evaluating forthcoming planning applications should the final document go on to be adopted as non-statutory Aberdeen Planning Guidance.

5. LEGAL IMPLICATIONS

- 5.1 As a major landowner, proposals for the development of land and assets owned by Aberdeen City Council will, where applicable, be subject to assessment in line with the principles and standards set out in the Masterplan document.

6. ENVIRONMENTAL IMPLICATIONS

- 6.1 The Strategic Environmental Assessment carried out as part of the Aberdeen Local Development Plan preparation included the allocation of sites OP56, 61 and 62. Any future planning applications would be subject to an EIA screening process under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.
- 6.2 The Masterplan document is subject to Habitats Regulations Appraisal (HRA), in accordance with Conservation (Natural Habitats, & c.) Regulations 1994, the European Commission's Habitats Directive (Directive 92/43/EEC) (Natura 2000), and Birds Directive (79/409/EEC) respectively. In the light of the HRA, it is considered that the proposal will not adversely affect the integrity of any of

the protected sites or their qualifying interests, and that the conservation objectives will be met during and after construction as well as following implementation and delivery of the required mitigation measures. The Masterplan document has been updated to include the mitigations outlined in section 6b of the HRA.

6.3 As is standard process with HRA, it should be revisited through project level HRA once planning applications come forward to deliver the masterplan. A full Environmental Impact Assessment for the Planning Permission in Principle application for the ETZ proposals will also be required.

7. RISK

7.1 The assessment of risk contained within the table below is considered to be consistent with the Council's Risk Appetite Statement.

| Category | Risks | Primary Controls/Control Actions to achieve Target Risk Level | *Target Risk Level (L, M or H) <small>*taking into account controls/control actions</small> | *Does Target Risk Level Match Appetite Set? |
|-----------------------|---|---|---|--|
| Strategic Risk | Not having an up-to-date Masterplan could result in longer timescales to manage and process planning applications for the area and affect the planning authority's obligation to determine applications within a set time period. | The document provides advice on what is required for the planning application process and land use requirements as well as any improvements and mitigation. | L | Yes |
| Compliance | These sites are allocated in the adopted Aberdeen Local Development Plan 2023. Not having an up-to-date Masterplan could result in longer timescales to manage and process planning applications for the area and affect the planning authority's obligation to determine applications within a | The document provides advice on what is required for the planning application process and land use requirements as well as any improvements and mitigation. | L | Yes |

| | | | | |
|------------------------------|---|--|---|------------|
| | set time period. It could also lead to inconsistent advice. | | | |
| Operational | By not providing guidance through an agreed Masterplan, officers could, over time, provide inconsistent advice. | The document provides clarity, consistency and certainly in terms of principles and site aspirations. | L | Yes |
| Financial | Not having guidance could lead to uncertainty at planning application stage, potentially leading to more staff time spent processing applications and a greater number of planning application appeals. | The document provides clarity, consistency and certainly in terms of what is required as part of the planning application process. It also identifies where mitigation and improvements are required and sets guidelines and principles for the whole area to ensure consistency and development | L | Yes |
| Reputational | Not considering guidance on a project that ACC own land within and is identified for development within the adopted Local Development Plan. | The Masterplan process is in place to inform the production of such documents as identified in the LDP. | L | Yes |
| Environment / Climate | Ensures that the Net Zero Route map is considered in the design of proposals. Noted that the environment of these areas will be altered. | The Masterplan document notes that proposals must consider energy use and emissions. It is also noted that the sites went through the necessary SEA process during consideration of the LDP and an | L | Yes |

| | | | | |
|--|--|--|--|--|
| | | HRA has been carried out. There is also the opportunity within the Masterplan to identify areas to help deliver biodiversity net gain. | | |
|--|--|--|--|--|

8. OUTCOMES

| <u>COUNCIL DELIVERY PLAN 2023-2024</u> | |
|--|--|
| | Impact of Report |
| Aberdeen City Council Policy Statement | The proposal within this report support the delivery of the following aspects of the policy statement: - |
| <u>Working in Partnership for Aberdeen</u> | A Prosperous City – Work with partners to stimulate sustainable economic development, including a managed transition to a carbon neutral economy and work in partnership with the academic, business and other relevant sectors to ensure the long-term future of the energy industry. Building a Greener and Sustainable City- Work with partners to deliver a just transition to net zero and plan to make Aberdeen a net-zero city by no later than 2037, and earlier if that is possible. |
| <u>Aberdeen City Local Outcome Improvement Plan 2016-26</u> | |
| Prosperous Economy Stretch Outcomes | The ETZ Masterplan states it “provides the basis for future development of energy transition industries, skills, innovation and investment in high-value manufacturing. It also focuses on the delivery of wider benefits in terms of job-creation, place-making, and the local environment.” thereby supporting a ready supply of employment land which would result in job creation (Key Driver 2.1, 2.2). |
| Prosperous People Stretch Outcomes | The Masterplan seeks to include and improve green spaces to support health and well-being of all ages (Key Driver 11.3). |
| Prosperous Place Stretch Outcomes | Supports outcome 13 by aiming to create a globally recognised green energy cluster contributing to progress on the Net Zero Routemap. |
| Regional and City Strategies | Aberdeen Local Development Plan 2023 |

| | |
|--|---|
| <u>City Strategies and Strategic Plans</u> | Supports the Aberdeen Local Development Plan 2023 by ensuring implementation of its allocated sites and policies forming the Energy Transition Zone. |
| | <p>Net Zero Aberdeen Routemap</p> <p>Confirms that a just energy transition is a vital priority. The ETZ Masterplan supports the Net Zero Aberdeen Routemap through the proposal of retrofitting and reuse of brownfield land and buildings as well as providing opportunities for net zero development and specialist co-located port activity. It also contributes to the Net Zero theme strategies of mobility, buildings and heat, circular economy, energy supply, our natural environment and empowerment.</p> |

9. IMPACT ASSESSMENTS

| Assessment | Outcome |
|-----------------------------------|--------------|
| Integrated Impact Assessment | Completed |
| Data Protection Impact Assessment | Not Required |
| Other | Not Required |

10. BACKGROUND PAPERS

- 10.1 Aberdeen Local Development Plan 2023. - <https://www.aberdeencity.gov.uk/services/planning-and-building-standards/local-development-plan/aberdeen-local-development-plan>
- 10.2 Due their volume, full un-summarised copies of representations are available in on the Members' sharepoint

11. APPENDICES

- 11.1 Appendix 1 – Draft Energy Transition Zone Masterplan.
- 11.2 Appendix 2- Summary of representations and officers' recommendations.
- 11.3 Appendix 3 - Habitats Regulations Assessment (HRA)

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Energy Transition Zone Masterplan Document

Final Submission Draft | V09

IronsideFarrar

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“The Energy Transition Zone, which will be located adjacent to Aberdeen’s new £400 million south harbour development, is expected to directly support 2,500 green jobs by 2030, alongside a further 10,000 transition-related jobs.”

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Executive Summary

Aberdeen and North East Scotland has a proud reputation as a thriving global hub for the oil & gas industry – driving job creation and growth across the region for decades. It is critical to the future sustainability of the region’s economy to diversify its established knowledge, skills, and infrastructure and be a key driver of energy transition toward meeting net zero targets. To enable and accelerate this, ETZ Ltd is advancing a targeted programme of investment and development to create a new globally recognised green energy cluster in Aberdeen.

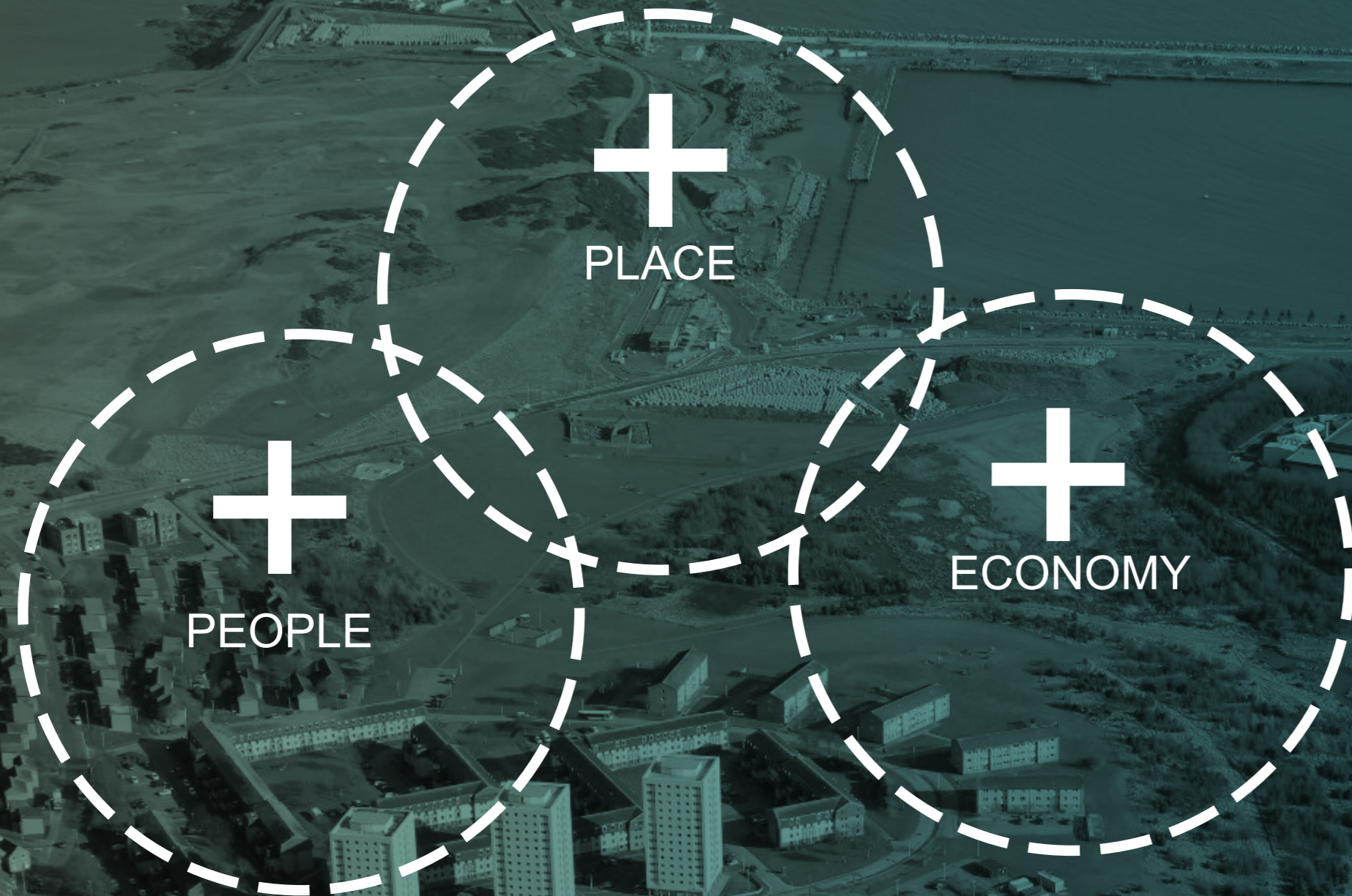
The Energy Transition Zone Masterplan has been prepared to provide a spatial framework for Local Development Plan allocated sites around Aberdeen South Harbour, as well as wider areas of brownfield land, green and open space, and communities in Torry and Cove.

It provides the basis for future development of energy transition industries, skills, innovation and investment in high-value manufacturing. It also focuses on the delivery of wider benefits in terms of job-creation, place-making, and the local environment. It has been prepared in consultation with a wide range of statutory and non-statutory stakeholders and following an extensive period of local engagement including three community consultation events held in Torry.

- The Masterplan is structured around the development of a specialist campus model:
- **Community & Energy Coast** – a programme of investment in local greenspace, biodiversity, and community infrastructures to deliver tangible local benefits across the area.
 - **Marine Gateway** – a hub of high-value manufacturing and port-integrated activity forming a catalyst for wider investment across ETZ – sited at Aberdeen South Harbour and a reduced development area within the OP56 Opportunity Site at St Fittick’s.
 - **Hydrogen Campus** – a specialist Campus for manufacturing, R&D, and test & demonstration of hydrogen technologies, strengthening Aberdeen’s position as a sector leader – sited at the OP61 Opportunity Site (Doonies) and adjacent brownfield land for future expansion.
 - **Offshore Wind Campus** – a cluster of manufacturing, supply-chain, R&D, and test & demonstration activity for offshore wind and wider energy transition uses – sited in Altens.
 - **Innovation Campus** – a purpose-developed mix of flexible industrial and commercial units for innovative start-up and growing energy transition businesses – sited in Altens.
 - **Skills Campus** – a new net zero education & training facility to accelerate the next generation of energy skills and knowledge and support delivery of ETZ Jobs & Skills Plan – sited in Altens.

Informed by the process of engagement, detailed review of local context, and in alignment with LDP and NPF4 priorities, the masterplan provides guidance for sustainable development and place-making across these sites. Its key outcomes and conclusions include:

- Development should maximise the potential of Aberdeen South Harbour to support energy transition – with limited land adjacent to the Harbour safeguarded for specialist activity with specific co-location requirements.
- While still enabling sites for high-value manufacturing, development within St Fittick’s Park should minimise greenspace land-take and retain the East Tullos Burn, with a reduced developable area representing just over half of the area allocated in the Park within Opportunity Sites OP56 and OP62.
- Opportunities to redevelop brownfield land as part of an integrated cluster should be maximised – applying Circular Economy principles to develop sites suitable for a range of energy transition activities.
- The environmental mitigation hierarchy should be followed across all development - seeking to avoid, minimise, mitigate and compensate environmental impacts.
- Opportunities for strategic environmental and place-making measures have been identified across the masterplan, including enhancement of East Tullos Burn, local greenspace, biodiversity, and active travel. These should be coordinated through further detailed planning and developed with local stakeholders to support a more inclusive, resilient and successful place.



01

Introduction

Aberdeen and North East Scotland has been home to a globally recognised energy industry for over 50 years. The region has experienced significant growth and developed a world-renowned ecosystem of innovation, skills, and infrastructure. There is now a clear imperative to de-carbonise the economy and achieve net zero by 2045 and, with its existing expertise and proximity to planned offshore renewables in the North Sea, Aberdeen has a key role in enabling the transition away from fossil fuels and towards a low carbon future.

Energy Transition Zone Masterplan
 The Aberdeen City Council (ACC) Local Development Plan (LDP) has identified land around Aberdeen South Harbour for development of the Energy Transition Zone, including land within Opportunity Sites at St Fittick’s Park (OP56), Bay of Nigg (OP62) and Doonies (OP61).

The sites contain a range of environmental and infrastructure assets, and the LDP recognises that potentially significant opportunities exist in the area for net zero development and specialist port co-located activity.

The LDP requires that a comprehensive masterplan should be prepared to ensure a coordinated approach to development of an Energy Transition Zone across the LDP Opportunity Sites. It requires a joint masterplan to consider the extent of developable and undevelopable areas, mitigation measures for potential impacts on habitats & biodiversity, greenspace, and local access & recreation, and options for use of the wastewater treatment plant. The LDP notes that Opportunities Sites OP56 and OP61 will support renewable energy transition related industries in association with Aberdeen South Harbour, while OP62 relates to the Aberdeen Harbour expansion. Specifically, the LDP requires for OP56 that: *“Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere”*.

The Masterplan has been prepared to ensure development across this area is properly planned in accordance with the LDP – as well as incorporating wider brownfield industrial land at Altens and East Tullos which can form part of an integrated cluster focused on delivering net-zero. It seeks to ensure development provides opportunities for high value renewables activity, new investment, growth and jobs, as well as promoting and enhancing the green and blue infrastructures across the area that collectively will accelerate the transition to net zero and deliver a range of benefits for local communities.

It has been developed through iterative design development and technical review, in parallel with detailed engagement with statutory bodies, stakeholders and local communities. This has shaped a place-based framework to guide development, support investment into identified Opportunity Sites as well as brownfield industrial land, deliver enhancement to local community infrastructures, greenspaces, and biodiversity, and strength both active travel and wider connectivity across the area.

ETZ VISION: *By 2030 we will have designed and built in phases a unique Energy Transition Zone adjacent to the new harbour development at Aberdeen South Harbour. It will be a **leading-edge catalyst** for innovation and **high value manufacturing**, and a **centre of excellence** for offshore renewables, large scale production of hydrogen and CO2 storage.*

*Through the success of the ETZ, the region and the **energy supply chain** will become a **global leader in energy transition**, and a net exporter of **product, services, technologies, and skills**.*

*This purpose-built **net zero green space**, connected to the coastline, will provide future Energy Transition organisations and the **local community** with amenities, job opportunities, **a strong blue-green network** supporting a long term business environmentally sustainable business cluster; harnessing the region's natural resources and existing skills base to **maximise the future value potential** from Energy Transition developments for future generations."*

1.1 ETZ Vision & Objectives

ETZ Ltd was established in 2021, as a private sector led and not-for-profit company, with the purpose of repositioning the North East of Scotland as a globally recognised integrated energy cluster focused on the delivery of net zero. It is funded by the UK and Scottish Governments and Opportunity North-East, with a clear purpose and commercial focus. All financial benefit from the use of public sector funding or future funds will be re-invested into common interests for development of energy transition activities.

ETZ Ltd are advancing a place based transformational programme, developed to create a new globally recognised integrated energy cluster with a spatial focus around the new Aberdeen South Harbour, Altens and East Tullos Industrial Estates, together with wider programmes for innovation, skills and supply-chain development and research and development with industry and academic partners.

To deliver the vision and ambition for the region, ETZ Ltd will work collaboratively with Scottish Enterprise (SE), Aberdeen City Council (ACC) and Port of Aberdeen (PoA) and industry stakeholders across the UK to deliver activity that will drive the green economic recovery and create a solid foundation for an integrated energy cluster focused on the delivery of net zero.

The masterplan seeks to articulate the ETZ Ltd vision and objectives into a spatial framework that supports development of the Local Development Plan allocated Opportunity Sites (OP56 / 61 / 62) and wider brownfield assets. This will accelerate energy transition, attract investment in high-value manufacturing for net zero technologies, and deliver wider benefits in terms of job-creation, place-making, and the local environment.

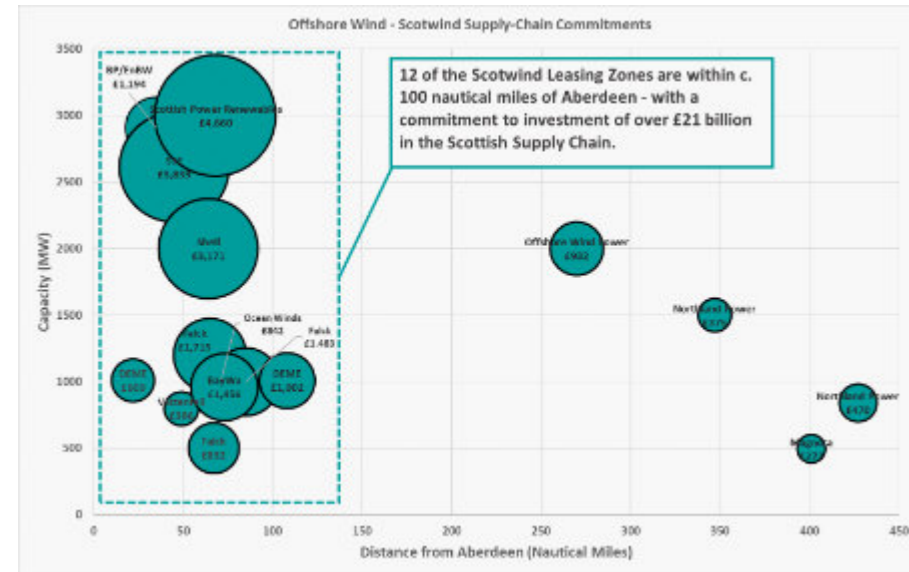
The strategic objectives for the ETZ are set out below:

- Attract and maximise inward investment, retain existing investors and help ensure the region becomes a focal point for energy transition in the UK and Europe, promoting and harnessing our local natural resources and existing skills and expertise to create a sustainable low carbon and integrated energy cluster.
- Assemble the land for the core staging areas to support the offshore wind potential and related UK supply chain content from the ScotWind licensing round and hydrogen production and the supporting infrastructure to leverage the Aberdeen South Harbour new facility.
- Develop an Energy Coast to deliver a green network for walking, cycling and enhanced community amenities, linking the ETZ with the coast and the city
- Stimulate research, development and innovation through to commercialisation and scale; creating and enabling energy transition opportunities and international export potential in the short (2020-25) and medium term (2025-35) to support commercialisation of green hydrogen and floating wind; high-value manufacturing related to the offshore wind and hydrogen; digital solutions and business innovation and incubation related to low carbon energy including Carbon Capture Utilisation & Storage (CCUS).
- Design and deliver a jobs and skills programme to support inclusive employment opportunities by reskilling and upskilling people to establish a new long-term sustainable industry base with international export potential. This will unlock exciting careers and job opportunities for future generations across the community by involving those areas in the immediate vicinity of the zone.

Fundamental to the vision for the Energy Transition Zone is creating and retaining sustainable energy jobs in Aberdeen and wider North East Scotland Region. The region is currently home to around 45,000 energy jobs (over half of Scotland's total) and the capability, knowledge and skills of this workforce will play a critical role in the transformation of the energy sector and delivery of net zero. As the economy seeks to de-carbonise and transition towards renewable energy, there is a clear opportunity and need to transition these roles into new sectors and activities such as offshore wind, hydrogen, carbon capture, utilisation & storage. The globally integrated energy cluster at ETZ will play a significant role in this process supporting long-term economic benefits in the form of inclusive job creation, safeguarding existing employment, as well as attracting inward investment, and supporting local community benefits. It is anticipated that the full delivery of the ETZ will lead to creation of c. 2,500 full-time equivalent jobs (gross) at its peak, as well as securing and catalysing c. 10,000 further energy transition related jobs across the region.

To support inclusive job creation, ETZ Ltd is developing a Jobs & Skills Plan in collaboration with Aberdeen City Council, Skills Development Scotland and NESAs (National Energy Skills Accelerator). The Plan will complement development and investment proposals guided by the Masterplan, and support delivery of training facilities and programmes within the Zone to position the North East as a world class region for skills development and training in support of energy transition.

In summary, the Energy Transition Zone will contribute significantly to the Inclusive Growth agenda. Direct investment in new education and training facilities will help advance the understanding and equality of opportunities in the energy sector and support the development of skills required to succeed. It will support a transition to high quality, well-paid, and sustained employment and facilitate the provision of a highly skilled workforce.



ScotWind leasing zones & supply-chain commitments. The bubble represents the relative size of each leasing zones' committed investment into the Scottish Supply Chain with the developer and exact figure noted inside (£M). The majority of offshore wind leasing zones including the largest proposed developments, are all within c.100 nautical miles of Aberdeen.

1.2 Strategic Context & Need

Aberdeen and North East Scotland has been a thriving global hub for the oil & gas industry driving growth across the region and supporting the UK's economic and energy security for over 50 years. It is a centre of excellence for offshore engineering, especially around service support and sub-sea operations.

In order for Aberdeen and the North East to be a leading player in the transition to net zero, and to leverage its established knowledge and expertise, there must be investment now in the development of the skills, infrastructure and innovation capacity that will support and service renewable energy needs. It is critical to the future sustainability, to jobs and economic prosperity of the region's economy.

This strategic need has been recognised and embedded within policy at local and national government levels – which support the safeguarding and coordination of key development sites and infrastructures around Aberdeen South Harbour and nearby greenfield and brownfield sites for energy transition.

- **NPF4** sets out an integrated strategy to bring together within the Planning Framework the governments priorities to achieve sustainable development. The framework defines a national spatial strategy to support the development of sustainable places, liveable places and productive places.

Aberdeen Harbour is designated as a 'National Development' – recognising the potential of the South Harbour as a cluster of port accessible offshore renewable energy research, manufacturing and support services.

- **The LDP designates specific Opportunity Sites (OP56/61) around the Harbour for an Energy Transition Zone and applies a presumption in favour of development for renewable energy related development within these areas.**

- **Scottish Government Policy** including National Strategy for Economic Transformation (2022), Draft Energy Strategy and Just Transition Plan (2023), Offshore Wind Policy Statement (2020), and Hydrogen Policy Statement (2020) all support development of ETZ (and projects therein) to accelerate Scotland's transition to net zero, deliver jobs, innovation and skills development, and strengthen the North East's position as a leading hub for renewables.

ScotWind Offshore Renewables

Crown Estate Scotland's ScotWind leasing round was completed in January 2022 and was the first round of seabed leasing in Scottish waters for over a decade. This has initiated a major new tranche of offshore wind development that will be central to achieving Scotland's net zero ambitions. It sets out seabed option agreements for 20 offshore wind farms, with a total potential capacity of up to 28 GW. 12 of the ScotWind sites, with a combined potential capacity of 17 GW (60% of current ScotWind Licences), are situated within c. 100 nautical miles of Aberdeen, making it a natural hub for the sector.

Collectively the developers of these sites are committed to supply-chain investment of £21 Billion into Scotland's supply chain, across development, manufacturing, installation, and operational phases. The Scottish Government has recognised there is an urgent need to develop the manufacturing and supply-chain capacity within Scotland to meet this demand, and to ensure the full extent of economic, environmental and social benefits of offshore wind are realised.

Scottish Offshore Wind Energy Council's (SOWEC) Strategic Investment Assessment (2021) reflects this, highlighting that: "without access to sufficient high quality port space, Scotland cannot hope to attract critical activities like manufacturing". It recommends stronger collaboration between Ports, industry, and the public sector to bring forward investment and grow capacity, so that Scotland is attractive as a location for manufacturing and fabrication, and so that Scottish expertise in subsea engineering can transition effectively from oil and gas to offshore wind.

In modelling options for growing Scottish and UK content in the offshore wind supply chain, SOWEC's analysis estimates that up to 15 new manufacturing facilities will be required in the UK and up to 6 of these in Scotland. Particular priorities for Scotland were manufacture of: turbine towers, floating foundations, jacket foundations, substation platforms, and sub-station foundations. In each of these cases, facilities need to be located in close proximity to a Port to allow for importing of raw materials (e.g. steel) and the mobilisation and export of finished products due to their size and inability to transport by road.

In addition to those items listed, there is significant investment interest around manufacture of large component parts such as landing platforms or transition pieces, and other elements of the offshore supply chains such as anchors and cables which can also support energy transition activities in the de-carbonisation of the oil & gas sector.

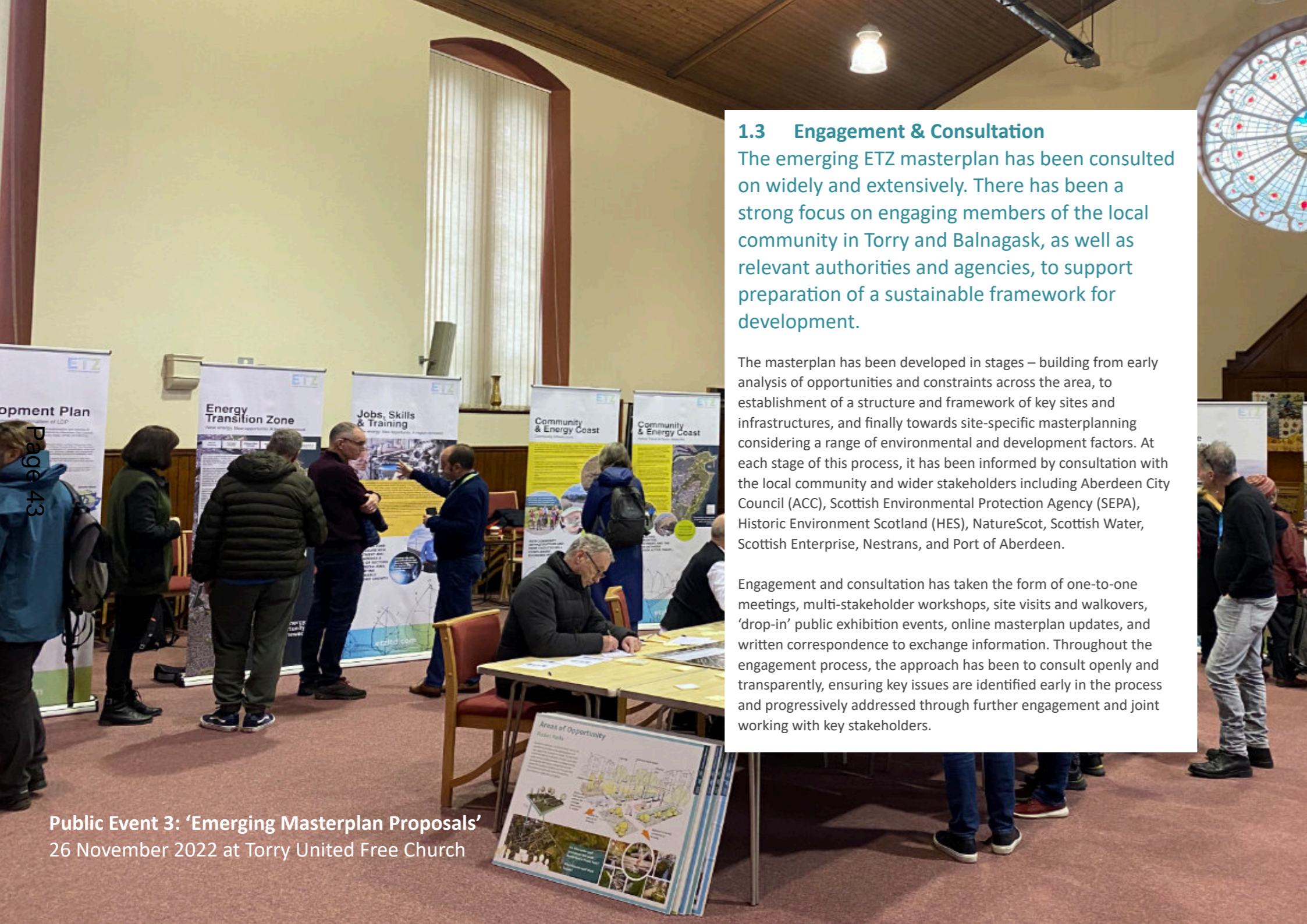
Green Hydrogen

Hydrogen is also rapidly emerging as central to the future net zero economy. Aberdeen and North East Scotland has already emerged as a leading hub of hydrogen activity, with current and planned projects expected to generate 200 MW+ by 2025-27, and potential for up to 1GW of production by 2030-32. The city's wealth of experience in the oil & gas sector is capable of being re-utilised for hydrogen-based activity, with identified potential for up to 29,000 jobs in the sector by 2040. There is already significant interest and planned activity in the Zone to support hydrogen production, distribution, and use – including BP, ERM Dolphyn, and Vattenfall among others who are seeking to base leading edge technologies and projects within Aberdeen.

Energy Transition Manufacturing & Supply Chain

Within sectors like offshore wind and hydrogen, energy transition will require the progressive development and commercialisation of new technologies. This will involve the reorganisation of existing manufacturing capacity together with new manufacturing activities and all associated supply-chains. For offshore wind this can involve specialist fabrication of moorings, semi-submersible, tension and other sub-sea structures, power electronics and cables, turbine components, mono-piles and transition pieces. The rapid growth of hydrogen as a green fuel presents opportunities for the manufacture of electrolysers and associated components, hydrogen fuel cells, and specialist equipment for distribution and storage. Aberdeen is ideally positioned to attract significant investment as a manufacture, supply-chain and service hub for offshore wind, hydrogen and the wider renewables sectors, both in terms of geography and existing knowledge and skills-base.

To maximise this transformational economic opportunity, it requires early, catalytic investment into land and infrastructure. This is especially critical for land which can integrate with the port and accommodate the specialised high-value manufacturing processes associated with offshore renewables. Offshore renewables also bring long-term opportunities in the supporting Operations & Management (O&M) activity that requires port co-location, and related services around remote sensing, technical monitoring and performance management skills. The masterplan has been informed by detailed review and input from specialist advisors working within these energy transition sectors, to establish future needs to support ScotWind and the key opportunities and areas of growth for Aberdeen. ETZ Ltd and Port of Aberdeen are working with Scottish Enterprise, Scottish Development International and Invest Aberdeen to progress inward investment inquiries linked to ScotWind delivery, including manufacturing, fabrication, service support and technology providers.



Public Event 3: 'Emerging Masterplan Proposals'
26 November 2022 at Torry United Free Church

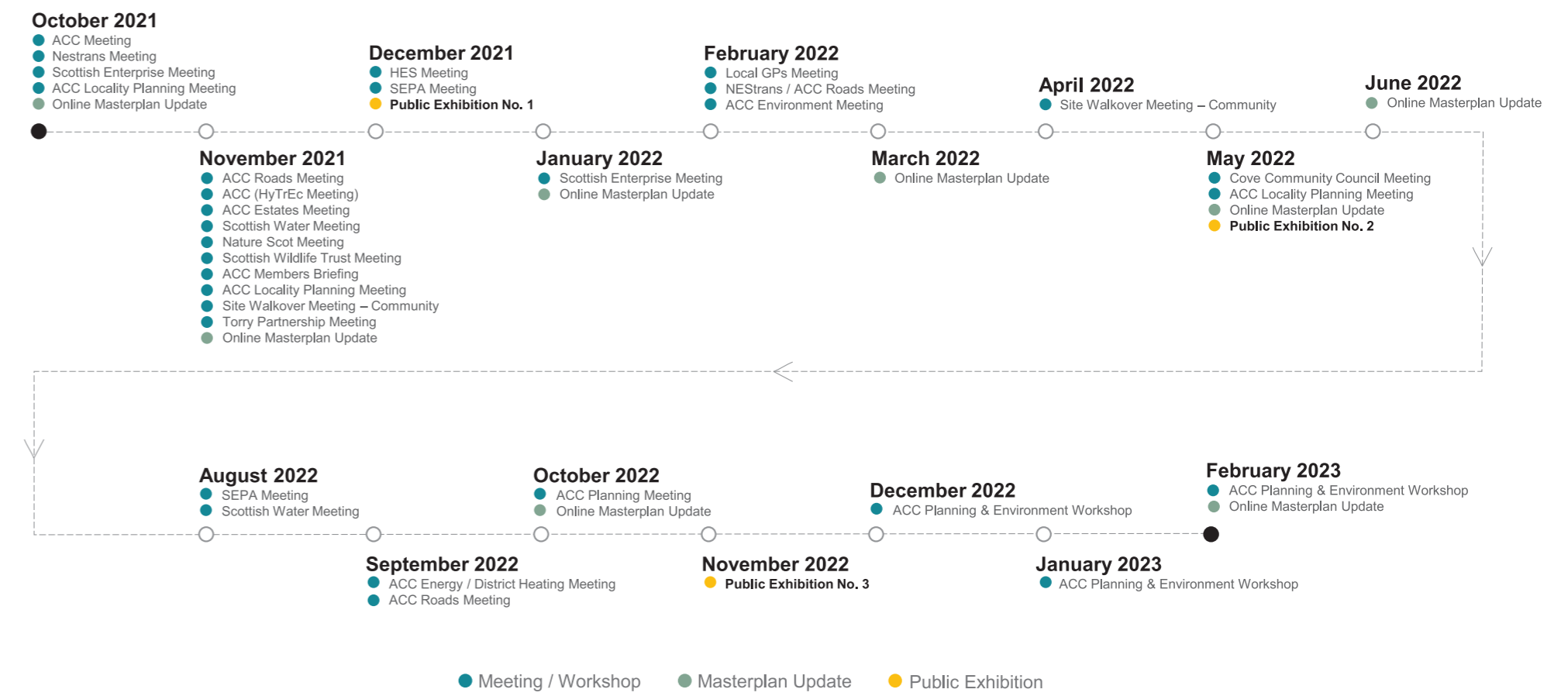
1.3 Engagement & Consultation

The emerging ETZ masterplan has been consulted on widely and extensively. There has been a strong focus on engaging members of the local community in Torry and Balnagask, as well as relevant authorities and agencies, to support preparation of a sustainable framework for development.

The masterplan has been developed in stages – building from early analysis of opportunities and constraints across the area, to establishment of a structure and framework of key sites and infrastructures, and finally towards site-specific masterplanning considering a range of environmental and development factors. At each stage of this process, it has been informed by consultation with the local community and wider stakeholders including Aberdeen City Council (ACC), Scottish Environmental Protection Agency (SEPA), Historic Environment Scotland (HES), NatureScot, Scottish Water, Scottish Enterprise, Nestrans, and Port of Aberdeen.

Engagement and consultation has taken the form of one-to-one meetings, multi-stakeholder workshops, site visits and walkovers, 'drop-in' public exhibition events, online masterplan updates, and written correspondence to exchange information. Throughout the engagement process, the approach has been to consult openly and transparently, ensuring key issues are identified early in the process and progressively addressed through further engagement and joint working with key stakeholders.

Stakeholder Engagement Timeline





Public Event 1: ‘Listening’
4 December 2021 at Torry United Free Church

Community Consultation

The local communities in Torry, Balnagask, and Cove have been and will continue to be key stakeholders and partners in the development of the Energy Transition Zone. Local people, and representative groups, have been actively engaged throughout the period of masterplan preparation, as well as through liaison with Community Planning Officers (Torry Locality Planning).

The focus of community engagement on the emerging masterplan has been through ‘drop-in’ public exhibitions – held on three occasions across 2021 and 2022 at the Torry United Free Church. For all three events, flyers were delivered to all households (5000+) within the Torry community, and advertised online through the ETZ website, social media, and via email to contacts within the ETZ mailing list. All consultation material presented at events was published online (via a dedicated consultation website) to ensure it was accessible to a wide audience, and available for local people unable to attend in person.

The ‘drop-in’ public exhibitions provided an open forum for members of the public to review the latest information on masterplan proposals. The events were attended by ETZ Ltd and their consultants and gave the opportunity for people to feedback directly on the issues most important to the community. While the exhibition events provided the focus of community engagement at key stages in the masterplan process, these were complemented through the period by a combination of:

- Online masterplan updates published to a dedicated webpage.
- One-to-one meetings and site walkovers with local representatives (Torry Partnership) and local interest groups (Friends of St Fittick’s)
- Written feedback and correspondence via a dedicated email address for the project.



Event 1: ‘Listening’

**4 December 2021 at Torry United Free Church
C. 110 Attendees**

Consultation Event 1 focused on introducing the masterplanning process and ETZ’s vision. It was a ‘listening exercise’ to hear the views of the community, build understanding of local context, and ensure key issues for planning and development could be raised at an early stage.

Event 2: ‘Exploring Opportunities’

**28 May 2022 at Torry United Free Church
C. 45 Attendees**

Consultation Event 2 sought to update the local community on the developing masterplan programme and explain the emerging response to key issues including East Tullos Burn and brownfield land. The event introduced potential areas of opportunity that the masterplan could support and enable, including active travel connections, pocket parks, enhanced access to Tullos Wood, and renewed park facilities.

Event 3: ‘Emerging Masterplan Proposals’

**26 November 2022 at Torry United Free Church
C. 110 Attendees**

Consultation Event 3 was held after publication of the Examiners Report into the Proposed ACC LDP and provided an update on the proposed Modifications to the Plan and requirements for the masterplan. Plans, graphics, and illustrations showed emerging illustrative layouts for key sites, including St Fittick’s Park and Doonies, along with identified areas of environmental mitigation and compensation. Consultation also sought further feedback on emerging proposals for investment in community infrastructure, active travel, green networks, and biodiversity within the masterplan.



Public Event 2: 'Exploring Opportunities'
28 May 2022 at Torry United Free Church



Through the engagement outlined above and in dialogue with the local community a wide range of issues and perspectives were raised, with a particularly strong interest in the allocated Opportunity Sites at St Fittick's Park and Bay of Nigg (OP56 and OP62), and the potential for resultant impacts on access to greenspace, biodiversity, and local environmental quality. The key issues and themes of feedback that emerged across the community consultation are summarised below:

Land Use & Economy

- Recognition and support for the principle of energy transition in Aberdeen, reducing reliance on oil & gas and transferring skills to the green economy.
- Brownfield land should be prioritised for development over greenfield sites, making the most of existing land within Altens and East Tullos.
- Interest in what type of energy transition users, sectors and activities would locate on identified Opportunity Sites, and if there was demand or need for these in Aberdeen.
- Doonies Farm has been on the current site for many years, and some felt it should be protected by the City Council rather than allocated for energy transition use.
- Clarity sought on how economic development within ETZ would deliver opportunities for local people in terms of jobs, skills, training.

Parks & Greenspace

- There was significant concern around the loss of a portion of St Fittick's Park, which is highly valued by the community in Torry as its main green and open space.
- Uncertainty as to how much of the park may be temporarily used and restored, or developed, either by ETZ or by Port of Aberdeen as part of their construction of the South Harbour.
- Concern around the potential impacts on local health & well-being (including mental health) as a result of the loss of greenspace.

Local Environment

- East Tullos Burn was significantly enhanced in 2014 through a SEPA / ACC / Community partnership project, creating new wetlands which add to the quality of the park, as well as providing local biodiversity and drainage benefits. Strong views the Burn should be retained as a key local asset.
- Development at St Fittick's Park is close to residential properties within Torry, and there was concern around potential for impacts on local amenity, including from noisy port-related activities.
- Potential impacts from construction must be carefully managed given the sensitivity of the local environment and proximity to communities.
- There has been previous development in the area, including Ness Energy-from-Waste Facility (East Tullos) and Aberdeen South Harbour (Bay of Nigg) and the cumulative impact of development on the local environment must be considered.

Access & Connectivity

- The programme for delivery of improvements to the Coast Road must be coordinated and aligned with delivery of major development, including South Harbour, to ensure sufficient capacity within the road network.
- In particular, the potential for construction and operational traffic from either South Harbour or ETZ Development routing through Torry (Victoria Road) was raised as a significant concern.
- Recognition that local access and connectivity to the Green Network in South Aberdeen, including Tullos Wood and Balnagask-Cove Coast, could be improved.

Decision Making and Local Influence

- Some in the community felt that local voices have not been heard or listened to in previous decision making around other developments, including Ness Energy-from-Waste and Aberdeen South Harbour.
- There was some mistrust within the community of local institutions and organisations, in particular around how local benefits and committed actions and mitigations have been delivered from development.



Public Event 3: 'Emerging Masterplan Proposals'
26 November 2022 at Torry United Free Church

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In addition to public consultation undertaken through 'drop-in' exhibition events open to the public, local representative groups and bodies have been engaged and fed-back into the masterplan process. This has included attendance at the exhibition events, one-to-one meetings with ETZ Ltd and consultants, informal site visits, and written feedback. Specific groups and local bodies that have been engaged and the key issues arising from discussion and feedback are summarised below:

| Organisation | Key Interests and Areas of Discussion |
|---|---|
| Torry Partnership & Aberdeen South Locality Planning | <ul style="list-style-type: none"> All areas of activity and development that impact on local communities with specific concerns around any loss of greenspace and impacts on local amenity. Nature and scale of proposed land uses and activities within ETZ. Traffic and transport impacts – Coast Road delivery programme and impacts on local road network within Torry. |
| Cove & Altens Community Council | <ul style="list-style-type: none"> All areas of activity and development that impact on local communities with specific concerns around any loss of greenspace and impacts on local amenity. Traffic and transport impacts – Coast Road delivery programme. |
| Torry GP Practice & Health Practitioners | <ul style="list-style-type: none"> Potential for development proposals and loss of greenspace to impact on health outcomes in an area of significant deprivation / health and well-being issues. |
| Friends of St Fittick's Group | <ul style="list-style-type: none"> Impacts of development on St Fittick's Park as a key community asset, particularly around local amenity, biodiversity, and health and well-being. Protection of local environmental features – including East Tullos Burn and associated habitats. |
| Local Representatives & Community Leaders | <ul style="list-style-type: none"> Impacts of development on St Fittick's Park including local amenity, biodiversity, health and well-being. |

Statutory Bodies & Agencies

In parallel with the programme of consultation at the local community level, engagement has been ongoing with statutory agencies and organisations to identify areas of sensitivity, shape emerging proposals, and ensure a framework for development that is sustainable. The following bodies have been engaged through a series of meetings and workshops across the period of masterplan preparation.

| Organisation | Key Interests and Areas of Discussion |
|-----------------------|--|
| NatureScot | <ul style="list-style-type: none"> Approach to protecting local environmental, particularly designated assets (SSSI, Geological Conservation Review, Local Nature Reserves). Local landscape character and environment & place assets. Impacts on local greenspace and biodiversity / habitats (St Fittick's Park). |
| HES | <ul style="list-style-type: none"> Setting of local heritage assets, in particular St Fittick's Church (Scheduled Monument). Opportunities for enhancement and appreciation of Tullos Hill Cairns (Scheduled Monuments). |
| SEPA | <ul style="list-style-type: none"> Maintaining hydrological and ecological function of East Tullos Burn, including wetlands within St Fittick's Park. Opportunities for environmental enhancement and improvement of water quality, drainage functions. |
| Scottish Water | <ul style="list-style-type: none"> Protection of Scottish Water assets & infrastructure serving Nigg Waste-Water Treatment Works. Potential service diversion requirements to facilitate / enable development. |
| Nestrans | <ul style="list-style-type: none"> Regional Transport Strategy Development of Regional Transport initiatives addressing all modes (active travel / Public transport/marine/rail/road). Freight requirements and intersection of marine/rail/road modes within masterplan. Coast Road Assessments and coordination of delivery across the area between parties. |



Public Event 3: 'Emerging Masterplan Proposals'
26 November 2022 at Torry United Free Church

Direct engagement on the emerging masterplan has been undertaken with Port of Aberdeen to coordinate development programmes, operational needs, and to ensure a strong combined proposition for inward investment. Engagement and project review has also been undertaken at regular intervals with Scottish Enterprise and Nestrans to gather feedback on emerging proposals and share information.

More broadly, ETZ Ltd have undertaken significant engagement with operators, sector specialists, and industry bodies within the masterplan area and across Aberdeen to guide the masterplan process. This has included ongoing dialogue with landowners in Altens and East Tullos, oil & gas operators, offshore wind suppliers and developers, hydrogen production / technology companies, and industry bodies such as Net Zero Technology Centre.

Aberdeen City Council

Detailed engagement has been ongoing with Aberdeen City Council across the period of masterplan preparation. This has sought to ensure coordination with Council-led works programmes and initiatives relevant to development in the area (e.g. Hydrogen Hub, Coast Road upgrade), land & property issues, and organisation of consultation activity around Local Elections (May 2022) and the process of LDP preparation.

Specific engagement with the Council as Local Planning Authority in relation to the Masterplan development has taken place post publication of the Independent Examiners Report **into the LDP (in September 2022)** and agreement of the findings and proposed modifications by the City Council. It has included a series of workshop meetings with officers from across Council service areas.

Engagement Summary

The consultation and engagement processes outlined above have been integral to the process of preparing the masterplan, and have directly informed the approach to development, environmental mitigations, and place-based interventions across the area. Across the various modes of consultation and from the range of perspectives heard, it has clearly emerged that the Opportunity Site at St Fittick's Park represents the confluence of key masterplan issues, with co-location to the port presenting a unique opportunity for high-value energy transition activity, balanced against the existing greenspace and biodiversity within the park.

| Council Service Area / Team | Key Interests and Areas of Discussion |
|---|---|
| ACC Planning & Design Officers | <ul style="list-style-type: none"> Design and development management principles for masterplanning. Land use and planning policy requirements (Local Development Plan and NPF4). ACC Masterplanning Process. Planning for 'Successful Places'. |
| ACC Roads & Transport Planning | <ul style="list-style-type: none"> External Transportation Links to ASH (Coast Road) – design, timescales, and coordination. Masterplan road and connectivity options – including potential road re-alignments. Traffic / transport impacts. |
| ACC Environment, Landscape & Biodiversity Officers | <ul style="list-style-type: none"> Environmental mitigation hierarchy – avoiding, minimising, mitigating impact on key environmental assets (incl. East Tullos Burn, local biodiversity / habitats / wildlife, woodland). Local landscape character areas. Integration of existing Green Network and opportunities for enhancements. Approach to environmental assessment across key sites. |
| ACC Archaeology & Historic Environment | <ul style="list-style-type: none"> Approach to mitigating impacts on the setting of local heritage assets, in particular St Fittick's Church (Scheduled Monument). |
| ACC Estates | <ul style="list-style-type: none"> Property and ownership arrangements across the masterplan area. ACC held land and property assets. |
| ACC Capital Projects & Energy | <ul style="list-style-type: none"> Local green energy opportunities arising from future ETZ development. Potential for District Heating Network connections and future hydrogen integration. |

The masterplan has therefore sought to provide a sustainable framework for development that fully realises the area's potential to lead the City's energy transition, while protecting the most important environmental assets and comprehensively mitigating impacts and enabling wide-ranging benefits that are accessible to local people. It has adopted a place-based approach – integrating the delivery of economic, social, and environmental infrastructures across the area into a single framework.

Beyond the submission of the masterplan, there is an ongoing commitment from ETZ to work in partnership with the local community and stakeholders to ensure local issues, along with wider considerations around social, environmental and economic imperatives are positively addressed as the masterplan progresses and through future development planning processes. This will also ensure that mitigation and compensatory measures are planned and developed to align with community priorities through a partnership working approach.





02

Place Context & Strategy

The masterplan is developed from a detailed understanding of existing local assets, context and character across Torry, Balnagask, Cove, Altens, and East Tullos. It seeks to establish a framework for energy transition development that will positively enhance this area through design quality, job-creation, active travel connections and integration, and environmental investment across the area and in surrounding communities.



Masterplan Study Area

While development will be principally focused towards LDP allocated 'Opportunity Sites' and designated 'Business & Industry' Land, the place-based approach to masterplanning has involved consideration of a wider area. This includes the communities of Torry & Balnagask and Cove, green and open spaces connecting these including Tullos Hill and the Coast, existing brownfield land in East Tullos & Altens, and associated transport and services infrastructure that serve these areas.

The masterplan seeks to identify where and how ETZ development can be delivered across this area in a form that is sustainable, as well as integrating and enabling wider initiatives that can effect positive change in the area delivering a broad range of social, environmental and economic outcomes and benefits.

Land Ownership

Within the masterplan area there are a range of land ownerships and development interests. All land within St Fittick's Park and on the coastal strip encompassing land at Girdleness, Gregness, Doonies is in the ownership of Aberdeen City Council.

The Port of Aberdeen have current lease and ownership interests on land associated with their development of the South Harbour around Nigg Bay, including land within St Fittick's Park and at Gregness which are currently being used for construction compounds and storage.

Within the industrial estates of Altens and East Tullos there is a mix of private ownership interests, reflecting their commercial nature and development pattern. The City Council own the ground lease to a number of sites within East Tullos on Greenwell Road and Greenbank Crescent.

ETZ Ltd has acquired three brownfield sites within the Masterplan area, all on Hareness Road. These are the Former Richard Irvin House, Former Muller Dairy Site, and the 6-acre brownfield site of former Trafalgar House. These will be refurbished, extended, and developed to the highest feasible energy performance standards, and will provide key hubs of activity within the Masterplan to be operated by ETZ Ltd and partners (specific detail is provided within Section 4).

ETZ Ltd do not otherwise own land within the masterplan area but have a purpose and remit to facilitate development and investment, collaborating with the City Council and wider partners (including private sector landlords), to form a new globally recognised integrated energy cluster providing new jobs and wider benefits for the city and region. Across the area they will seek to create developable sites, accelerate enabling infrastructure and site servicing works, and lead the development and delivery of wider environmental and community infrastructure projects.



Figure 3. Summary ACC Estates Plan showing areas of land owned by Aberdeen City Council – including land at St Fittick's Park, Nigg Bay, Tullos Wood, and within East Tullos Industrial Estate. (Nb. Plan is illustrative and may not reflect exact title boundaries or lease agreements within areas of ACC ownership)

2.1 Place Context: Planning & Policy

The place-based approach to masterplanning is a direct response to policy priorities at both national and local levels, where there is a clear policy drive for planning and development to deliver positive outcomes for Place, Inclusive Growth, Health & Well-being, Just Transition and Net Zero.

The Scottish Government has established a nationwide target of reaching net zero emissions by 2045, among the most ambitious carbon reduction programmes in the world. Meeting ambitious net zero targets will require a rapid transformation across all sectors of the economy and society, coupled with large-scale development and deployment of renewable energy technologies. Recognising the scale of transformation and change that will be involved, the Scottish Government have prioritised ‘Just Transition’ to ensure that the journey to net zero is fair for everyone, with opportunities for people to participate in and benefit from the investment, development and innovation that will drive energy transition.

Linked to Place Principle and net zero priorities, the delivery of ‘20-minute neighbourhoods’ is now Scottish Government policy embedded in the NPF4 and Programme for Government 2020-21.

The recently adopted **National Planning Framework 4** (NPF4) embeds all the above Scottish Government priorities in its approach to planning and development. Priorities for the ‘North-East’ are identified as: transition to net zero, improving local liveability, regenerating coastal communities, and decarbonising connectivity.

NPF4 forms part of the Development Plan, alongside the Local Development Plan, and future planning applications within ETZ must therefore demonstrate compliance with specific policy requirements and priorities around:

- **Sustainable Places** (Climate Mitigation & Adaptation, Biodiversity, Natural Places, Forestry, Woodland and Trees, Historic Assets and Places, Coastal Development, Energy, Zero Waste, Sustainable Transport).
- **Liveable Places** (Design Quality & Place, Local Living & 20-Minute Neighbourhoods, Infrastructure First, Heating & Cooling, Blue & Green Infrastructure, Flood Risk & Water Management, Health & Safety).
- **Productive Places** (Community Wealth Building, Business & Industry).

The NPF4 also defines the six qualities of ‘Successful Places’ which all development should seek to support and deliver, and which the masterplan has incorporated and sought to positively address. These are:

- **Healthy** – Supporting the prioritisation of women’s safety and improving physical and mental health.
- **Pleasant** – Supporting attractive natural and built spaces.
- **Connected** – Supporting well connected networks that make moving around easy and reduce car dependency.
- **Distinctive** – Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.
- **Sustainable** – Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.
- **Adaptable** – Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

Of direct relevance to ETZ and aligned with the LDP it identifies Aberdeen Harbour as a National Development (No.14). Land outwith the Harbour is not included in the National Development, though there is support for reorganisation of land use around the Harbour in line with the spatial strategy of the LDP, and optimisation of the Harbour to support net zero and stimulate economic investment. NPF4 states that: “the South Harbour can act as a cluster of port accessible offshore renewable energy research, manufacturing and support services”.

The Scottish Government’s **National Strategy for Economic Transformation** was published in March 2022 and also recognises the significant economic potential of energy transition, where Scotland has potential first-mover advantage and ability to become a world-leader in renewable energy, hydrogen economy, and wider industrial de-carbonisation.

The Scottish Government has also recently published its **Draft Energy Strategy and Just Transition Plan** (January 2023) for consultation. The Plan sets out measures to deliver a fair and secure zero-carbon energy system for Scotland, further accelerating the transition from oil & gas and maximising the potential of renewable energy to meet energy needs in a secure and affordable way that supports new economic opportunities. The Plan reinforces and strengthens Scotland’s ambitious renewable energy and de-carbonisation targets and seeks a Just Transition by maintaining or increasing employment in Scotland’s energy production sector and maximising the use of Scottish manufactured components in the energy transition, ensuring high-value technology innovation.

The Energy Transition Zone is highlighted within the Plan as a future focal point and catalyst for high-value manufacturing, research, development, testing and deployment with significant opportunities in offshore wind, hydrogen, and carbon capture storage.



Local Development Plan Policy for Energy Transition

The Local Development Plan (LDP) was adopted by Aberdeen City Council in June 2023, replacing the previous 2017 LDP. Preparation of the Plan began in 2018 and has been progressed through extensive public consultation, representations from a wide range of stakeholders, and an Independent Examination which concluded in September 2022.

At the conclusion of the Examination, the Reporters recommended Modifications to the Plan to require additional detail around environmental protection measures within the ETZ, which were subsequently incorporated by ACC and approved at a Full Council meeting in December 2022. Following notification of the Council’s intention to adopt the Plan, further minor modifications were directed by Scottish Ministers in May 2023 to take account of NPF4 adoption.

The LDP forms the primary planning policy context for the Masterplan and is part of the Development Plan against which future development proposals will be assessed and determined.

The LDP identified Opportunity Sites and Policies to support development of an Energy Transition Zone. The Policies recognise that the construction of Aberdeen South Harbour creates the opportunity to accommodate location specific energy transition developments that capitalise on supporting the rapid delivery of offshore developments. Specific LDP policy requirements are considered and addressed in detail within Section 4, but key extracts are summarised below and shown on the LDP Proposals Map:

OP56 (St Fittick’s Park)

“The site, along with OP61, will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere”.

OP61 (Doonies)

“This area, along with OP56, will support renewable energy transition related industries in association with Aberdeen South Harbour.

OP62 (Bay of Nigg)

“Aberdeen Harbour expansion in accordance with Bay of Nigg Development Framework”.

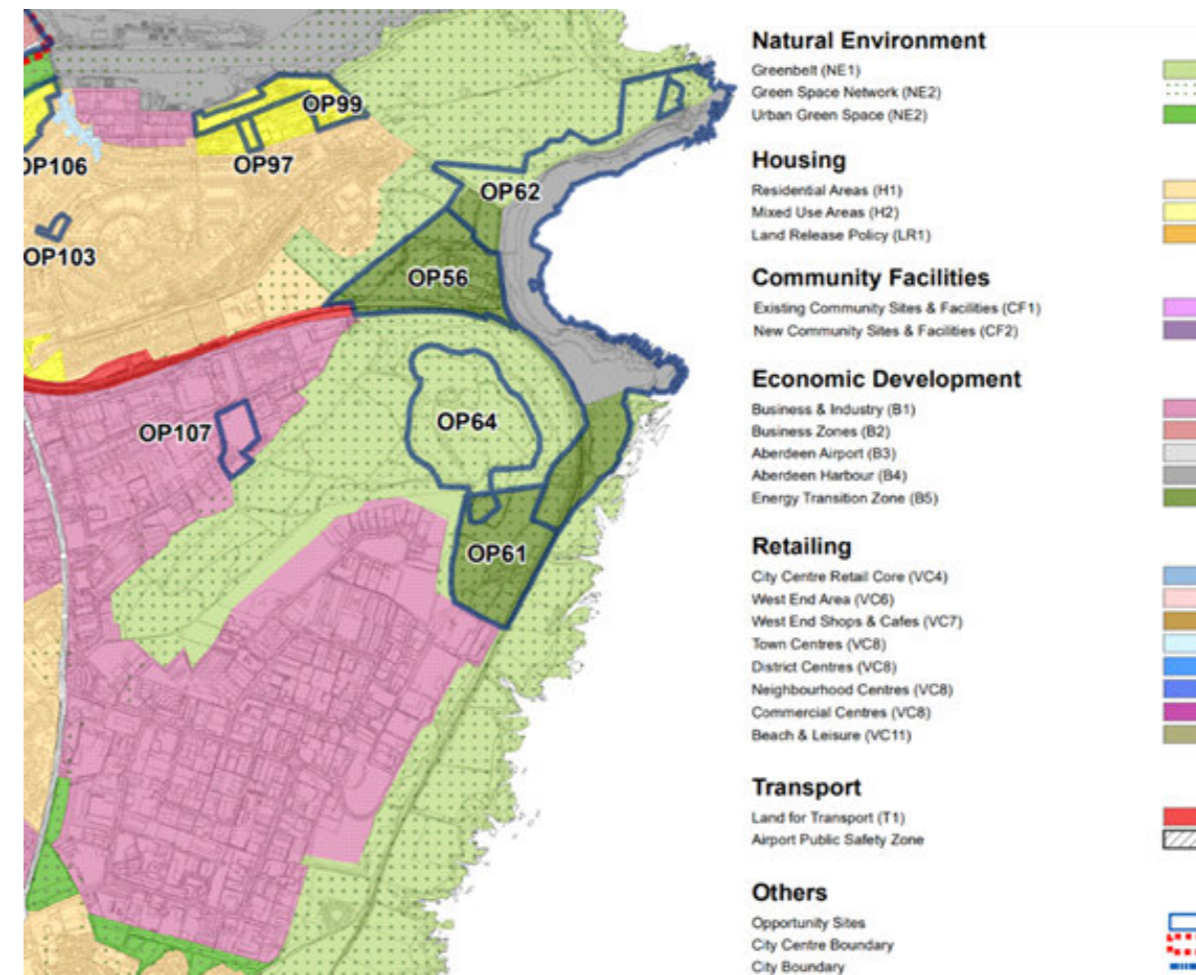
The Local Development Plan requires a joint masterplan for Opportunity Sites OP56, OP61, and OP62 and that this specifically considers the following matters:

- The extent of developable areas within B5 Energy Transition Zone zoning.
- Areas which should remain undeveloped and the extent of any buffer zones.
- Mitigation measures to ensure the continued viability of linear habitats including the East Tullos Burn, recreation and Core Path network.
- Options for the use of the waste-water treatment plant.
- Measures to avoid, minimise, mitigate, and compensate potential impacts on biodiversity / greenspace that will ensure at least no net loss of biodiversity across the masterplan area.

Complementing the Opportunity Site designations, Policy B5 of the LDP (‘Energy Transition Zone’) relates to land areas within OP56, OP61 and part OP62, and provides a presumption in favour of development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries including offshore wind, tidal, hydrogen, and solar.

The masterplan has been developed to incorporate these Opportunity Sites and wider surrounding areas. It forms a comprehensive framework that considers and addresses the specific requirements outlined in the LDP, along with wider opportunities for positive place-shaping and environmental enhancement.

The Bay of Nigg Development Framework was adopted (2016) as proposals for Aberdeen Harbour expansion were developed, to plan for necessary infrastructure and how to maximise impacts of investment for business and communities. The Bay of Nigg Development Framework pre-dates the current planning policy context (LDP and NPF4) as well as wider acceleration of Scotland’s transition net zero (Climate Change Plan and Draft Energy Strategy & Just Transition Plan) and the significantly increased scale of offshore renewables ambition (ScotWind Leasing Round). The purpose of this ETZ Masterplan is in-part to provide a refreshed and renewed plan for development across the area, reflecting this focus on energy transition.



The Local Development Plan

ETZ sits at the centre of overlapping agendas around Place, Net Zero, Just Transition, Health & Well-being, and Inclusive Growth. The Masterplan promotes a balanced approach based on sustainable place making that includes the following:

- A masterplan area that incorporates and considers all aspects of Place within the communities of Torry, Balnagask and Cove and how ETZ can contribute meaningfully to improvement for these communities.
- Working closely with the local community and other stakeholders through a programme of consultation and engagement to provide direct input and shape the Masterplan outcomes.
- A framework for delivery of energy transition development and infrastructure that addresses national priorities, whilst ensuring opportunities for local employment, inclusive skills development, and spin-off community benefits are embedded.
- Supporting local liveability and 20-minute neighbourhoods through mixed-use development and greenspace enhancement that is accessible through active travel and complementary to wider service and place-shaping improvements in the area.

2.3 Place Context: Environment and Biodiversity & Landscape

The masterplan area contains a range of environmental and local biodiversity features, including locally designated sites and areas well used by local communities and which contribute to place quality and health & well-being.

There is a mix of open, semi-natural greenspaces and more defined urban parks that provide a range of habitats and biodiversity. The area has undergone significant change over the past decade, affecting the balance between urban, industrial and greenspace character and local amenity. Improvements have included investment in the East Tullos Burn and wetlands, and planting in St Fittick's Park, but the area has also been characterised by significant development of industrial and energy infrastructure through Aberdeen South Harbour and the prominent Energy from Waste facility in East Tullos.

Greenspaces are typically diverse and provide a range of habitat and biodiversity – particularly within St Fittick's Park, Tullos Wood, and on the Balnagask-Cove Coast. A Site of Special Scientific Interest (SSSI) is located to the south of Nigg Bay (designated for its quaternary geology and geomorphology).

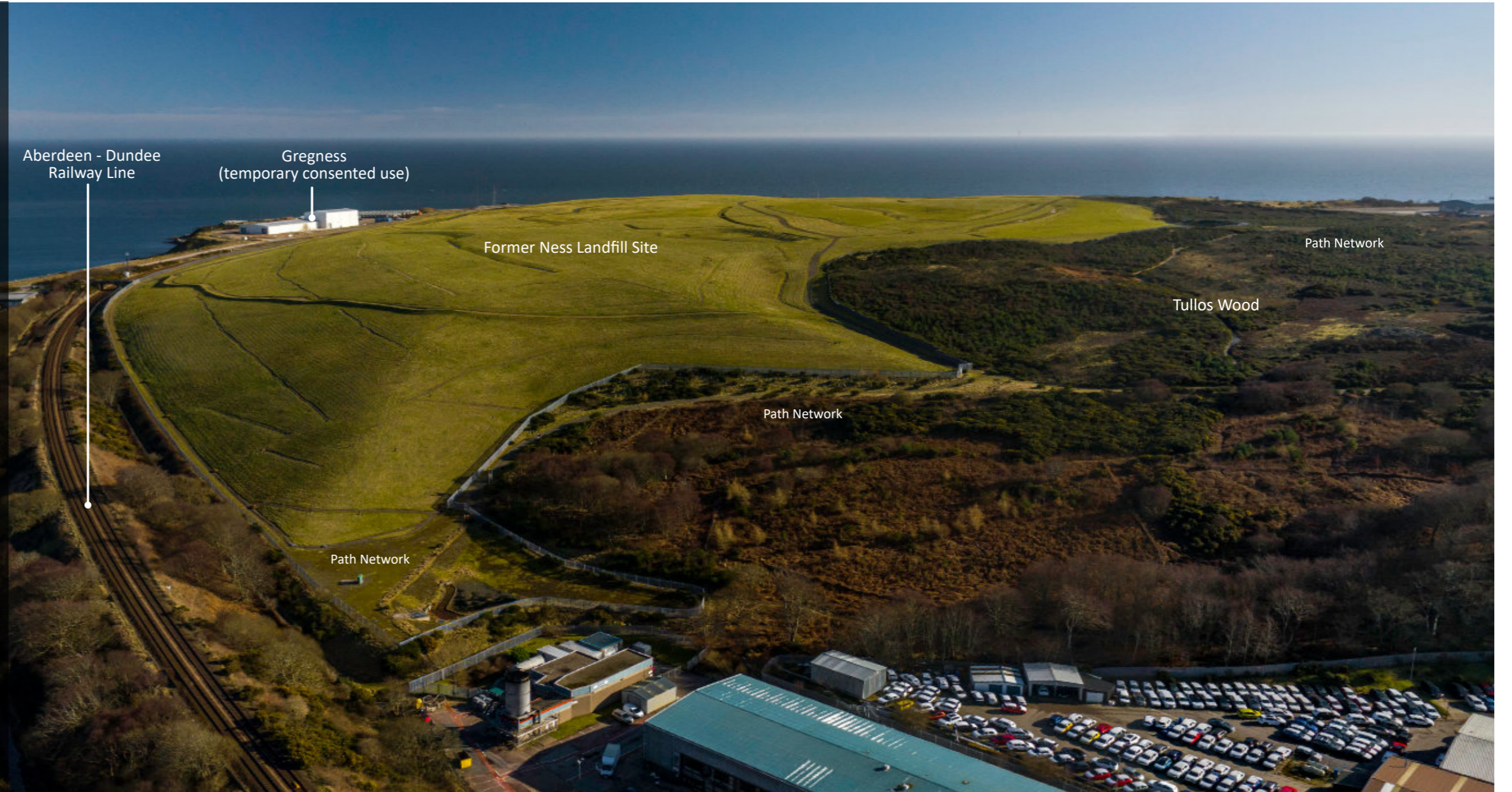
In addition to those core greenspace and landscape assets the area includes:

- **Walker Park** - sited next to Girdleness Lighthouse and has recently been utilised as a temporary construction site associated with Aberdeen South Harbour. It is to be reinstated upon completion of the Harbour and will be re-integrated into the Green Network.
- **Balnagask Golf Course** - occupies the Greyhope Bay headland and while operational as an 18-hole course remains publicly accessible and is a popular location for dog-walking and local recreation. The Masterplan does not propose any development of the Golf Course.
- **Former Ness Landfill** – situated to the west of the railway as it curves toward Aberdeen, the former landfill is not publicly accessible but is maintained as an open grassland by the City Council. Proposals for a solar farm on the site have been submitted and there is potential for complementary grassland management for biodiversity to be delivered through development.

Tullos Hill is designated as a Local Nature Conservation Site and includes a mix of habitats including broadleaved woodland, neutral grassland, scrub woodland, bracken, acid grassland, dry heath, and small patches of lowland birch woodland and wet heath. Species of bullfinch, red-backed shrike, Eurasian tree sparrow have been recorded on the site. A roe deer population on Tullos Hill has previously been identified and is actively managed by the City Council to encourage natural regeneration.

- At its north-western edge the LNCS includes areas of Ancient Woodland (NatureScot) and upland birchwood included within the Native Woodland Survey of Scotland
- A programme of Tree Planting was undertaken in 2012 as part of the city-wide 'Tree for Every Citizen' initiative, predominantly focused on areas of acid grassland. The existing path network connects key vantage points and historic burial cairns on the hill but is poorly connected to communities.
- Areas within the LNCS include landfill sites (landfill ceased in 2001) restored to grassland including the former Ness Landfill to the north which is not publicly accessible.
- Tullos Hill also contains a grouping of well preserved pre-historic burial Cairns – Tullos Cairn, Baron's Cairn, Cat Cairn, and Crab's Cairn all of which probably date from 2nd Millennium BC. They are all designated by HES as Scheduled Monuments.

Tullos Hill

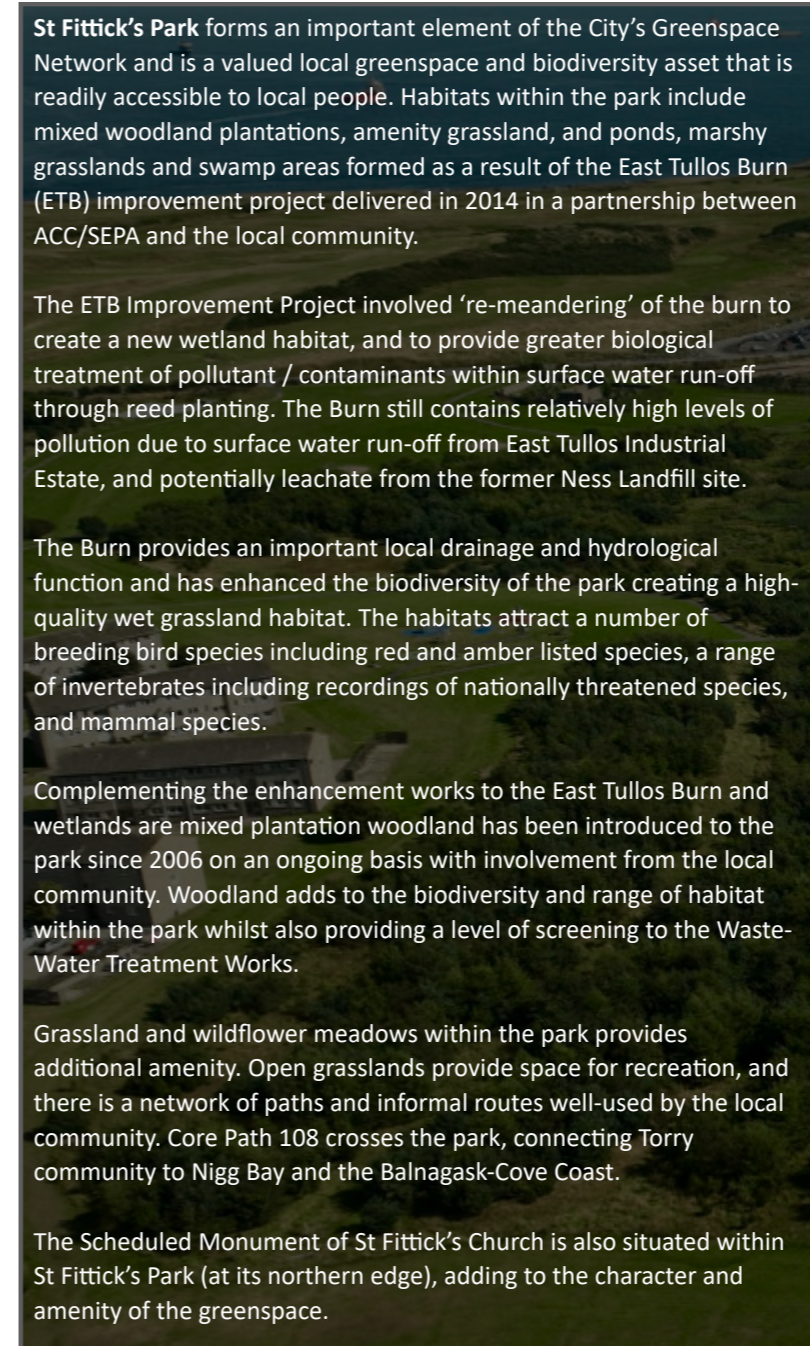




The **Balnagask to Cove Coastline** is also designated as a Local Nature Conservation Site, including the cliffs, caves, and beaches along the stretch of rugged and largely undeveloped coast. Habitats include coastal and neutral grasslands, European dry heath and coastal heath and areas of gorse scrub. As a result, there are numerous coastal plants and associated insects and invertebrates, and the site attracts a variety of coastal birds. There is also geological interest with andalusite in regionally metamorphosed magmatic rocks and areas of Nigg Bay towards the north of the site are designated as a geological SSSI.

- The Core Path (No. 78) connects and provides accessibility across the coastal greenspace, tracking the cliff-top ridge. It is well-used primarily as a walking route, connecting into local routes within Altens, Torry, and Cove.
- The coastal fringe to east of the railway is part of agricultural grazing operated by Doonies Rare Animals Farm. Coastal exposure and agricultural management limit current ecological status with the area managed as a productive grazing sward.

The Balnagask to Cove Coastline



St Fittick's Park forms an important element of the City's Greenspace Network and is a valued local greenspace and biodiversity asset that is readily accessible to local people. Habitats within the park include mixed woodland plantations, amenity grassland, and ponds, marshy grasslands and swamp areas formed as a result of the East Tullos Burn (ETB) improvement project delivered in 2014 in a partnership between ACC/SEPA and the local community.

The ETB Improvement Project involved 're-meandering' of the burn to create a new wetland habitat, and to provide greater biological treatment of pollutant / contaminants within surface water run-off through reed planting. The Burn still contains relatively high levels of pollution due to surface water run-off from East Tullos Industrial Estate, and potentially leachate from the former Ness Landfill site.

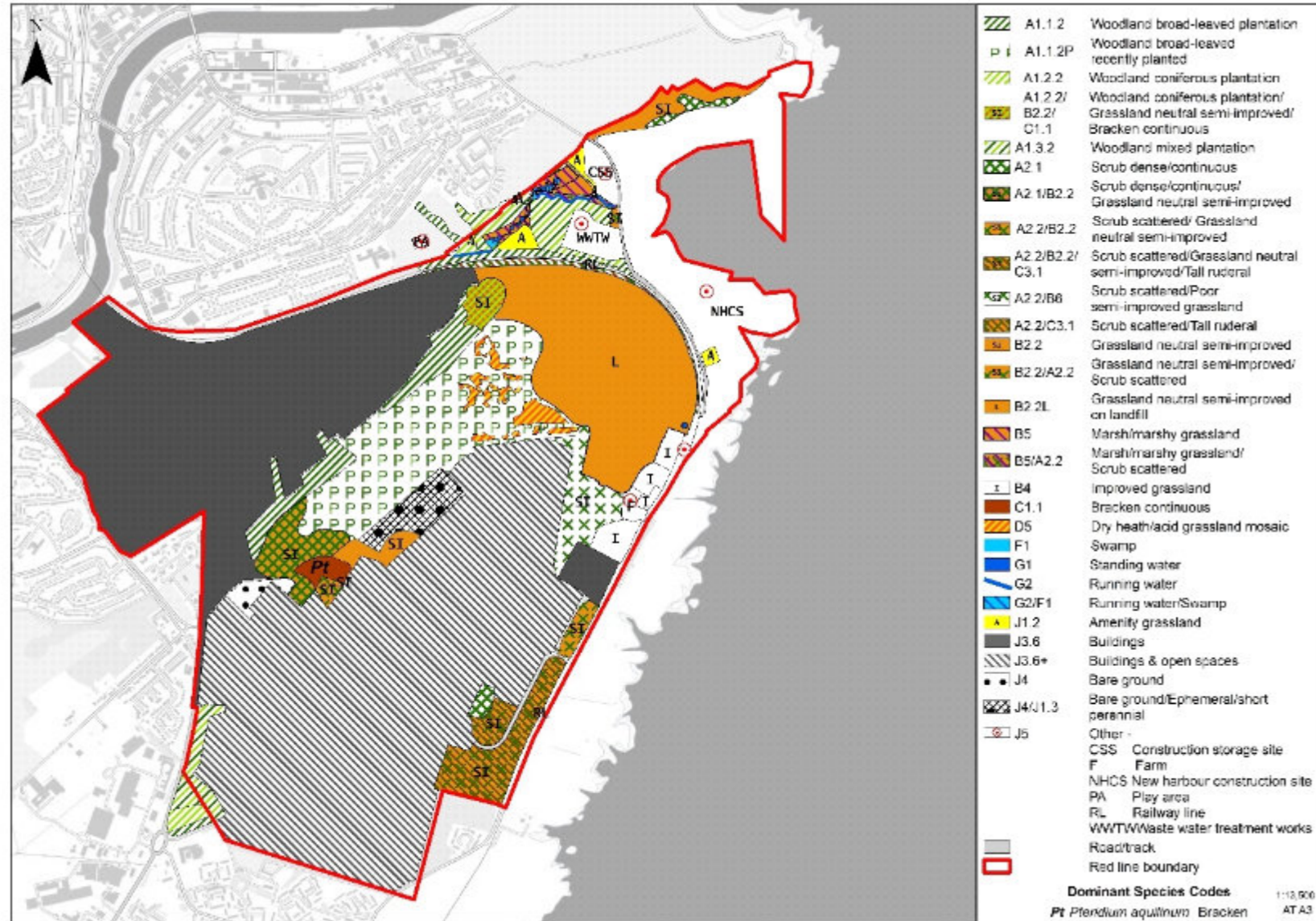
The Burn provides an important local drainage and hydrological function and has enhanced the biodiversity of the park creating a high-quality wet grassland habitat. The habitats attract a number of breeding bird species including red and amber listed species, a range of invertebrates including recordings of nationally threatened species, and mammal species.

Complementing the enhancement works to the East Tullos Burn and wetlands are mixed plantation woodland has been introduced to the park since 2006 on an ongoing basis with involvement from the local community. Woodland adds to the biodiversity and range of habitat within the park whilst also providing a level of screening to the Waste-Water Treatment Works.

Grassland and wildflower meadows within the park provides additional amenity. Open grasslands provide space for recreation, and there is a network of paths and informal routes well-used by the local community. Core Path 108 crosses the park, connecting Torry community to Nigg Bay and the Balnagask-Cove Coast.

The Scheduled Monument of St Fittick's Church is also situated within St Fittick's Park (at its northern edge), adding to the character and amenity of the greenspace.

St Fittick's Park



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Overview Plan from Phase 1 Habitat Survey. The area contains a mix of grassland and woodland habitats, and the wetland habitats associated with East Tullos Burn in St Fittick's Park.

Landscape Character

The area includes a mixture of landscape character types from a rugged coastal strip to wooded semi-rural hill and from the urban residential area of Torry/Balnagask to industrial estates at East Tullos and Altens. Landscape character and capacity can be referenced to the NatureScot Landscape Character Types (LCT's) that include:

- Cliffs and Rocky Coast – Aberdeen LCT covers the coastal strip between the Dee and Cove Bay and includes **Balnagask Golf Course**, Girdle Ness, St Fittick's Park, Nigg Bay and, to the south, the coastal strip lying mainly east of the railway.
- Low Hills – Aberdeen LCT covers the ridge of Tullos Hill south of the railway loop, lying between Tullos and Altens Industrial Estates. This is the southernmost of several hills on the periphery of Aberdeen which form prominent landmarks seen across the city.



Cliffs and Rocky Coast



Tullos Hill

Flood Risk

SEPA Flood Risk Mapping indicates instances across the masterplan area where there is surface water flood risk, including within St Fittick's Park associated with the drainage and hydrological function of the East Tullis Burn. Elsewhere across the masterplan area there are pockets of identified surface water flood risk within East Tullis Industrial Estate, and on the Coast Road around its junction with Hareness Road and at the SUEZ Recycling Centre. Future development proposals will need to be informed by Flood Risk Assessment and Drainage Assessment to fully consider implications on local flood risk and water environment.

SEPA Mapping does not identify risk from river or coastal flooding (including future scenarios), which is limited to those areas around the River Dee.

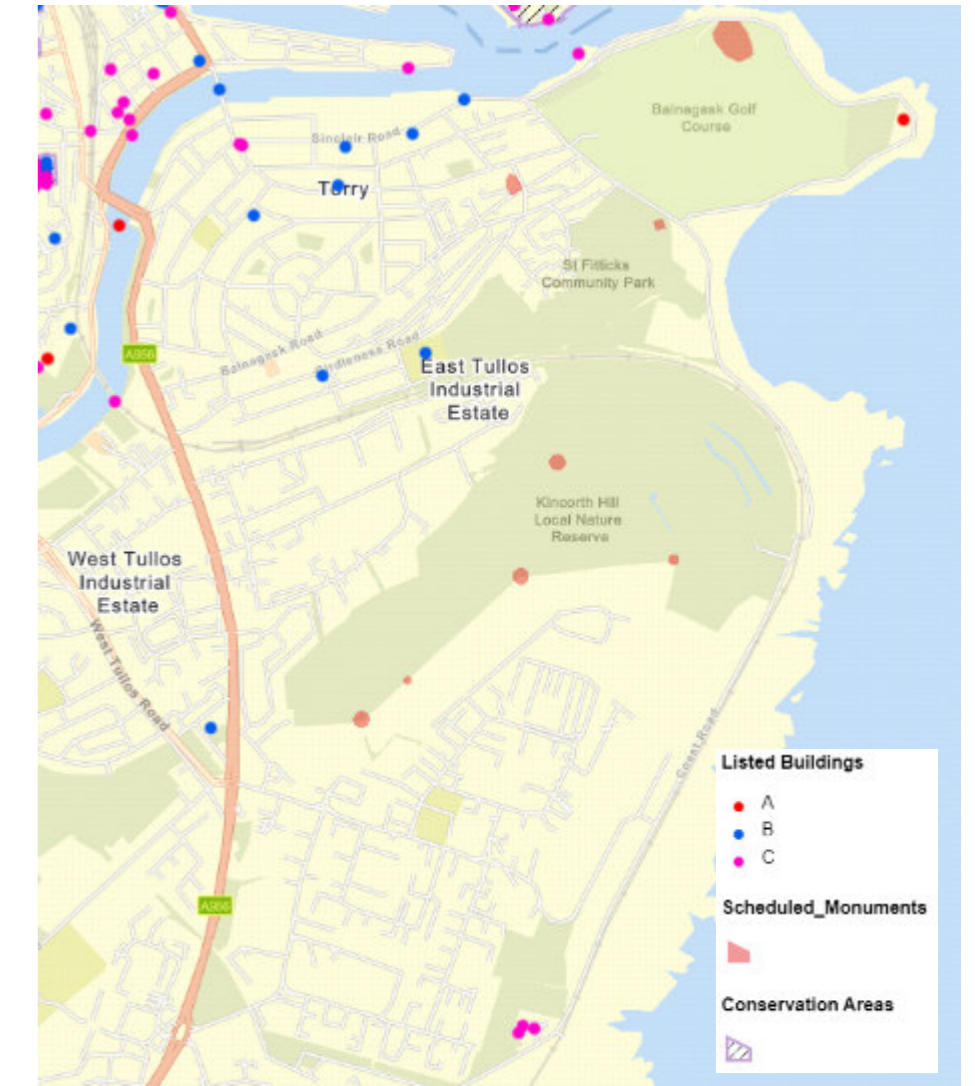


Figure 8. SEPA Flood Risk Mapping. Purple shading indicates areas currently at risk from surface water flooding. Future Flood Risk Assessment must consider potential impacts of development on local flood risk and any necessary mitigation measures.

Cultural Heritage

Associated with the historic development of Torry there are a number of important cultural heritage assets within the area. The Masterplan seeks to preserve and positively incorporate these assets.

- Torry & Cove settlements including a varied assemblage of Listed Buildings (Category A/B/C Listed) including Girdleness Lighthouse & east/West Leading Lighthouses, Smoke House, Church Buildings, cottages, historic tenements and architectural structures.
- St Fittick's Church (Scheduled Monument) – situated at the northern edge of St Fittick's Park it comprises the remains of a former parish church founded between 1189 and 1199. It was reconstructed and enlarged in the 18th century, but parts of the walls are 13th century. The setting and surrounding context of the Church has changed significantly in recent years following the development of Aberdeen South Harbour and associated infrastructure.
- Torry Battery (Scheduled Monument) – situated to the north of Balnagask Golf Course and overlooking Aberdeen Harbour entrance, the Battery was built in 1860. The remains comprise the perimeter wall, gateway and guardhouse, gun mounts and footings of some interior buildings.
- Girdleness Lighthouse (Category A Listed) – built in 1833 to aid navigation to Aberdeen Harbour and the River Dee.
- Tullis Hill – Tullis and Doonies Hill has a rich history with around 200 historic and archaeological features, including Barons, Cat, Crabs and Tullis Cairns – four Bronze-Age burial cairns that are Scheduled Monuments.



Cultural Heritage Designations (HES Designations Map Search)

2.4 Place Context: Infrastructure & Development

Infrastructure including travel, employment, education, recreation and health are all additional element of place that sit alongside the cultural and environmental aspects of place.

Regional Transport Strategy

Aberdeen City Council, Nestrans and regional partners are within the Regional Transport Strategy advancing a range of studies to set out the strategic needs 2020-240 building on the completion of the AWPR and other planned investments. Key elements of this relevant to ETZ include proposals associated with:

- A952 Wellington Road Corridor.
Key corridor facilitating Energy Transition Zone, South Harbour and community linkages.
- Craiginches Railfreight Facility.
Key rail freight opportunity site to south of City, part of ETZ masterplan area, adjacent to South Harbour.
- Regional Hydrogen Fuelling Facilities.
Expanding the network of hydrogen refuellers is key to the region's hydrogen ambitions.
- Transport Mobility Hubs.
Key to enabling a move to decarbonised and integrated transport system.

Transport Connectivity & Movement

Active travel choices within the area are relatively limited. Routes are primarily on-road that connect Aberdeen City Centre to Torry/ Cove/Kincorth via Wellington Road or Victoria Road and the Coast Road. An off-road cycle route for sections of NCR1 has recently been delivered through the Aberdeen South Harbour project – running parallel to the East Coast Main Line. Public transport routes similarly follow the same city arterials Wellington Road (Services 3/3A/3B) with circular services in Torry (Services 12 /15).

Leisure and recreational access are provided by the Coastal Path (NCR1 / CP 78), National Cycle Route (NCR1), local path networks (Torry (CP108/104) /Girdleness (CP78)/ Tullos Wood (CP103) /Coastal Path (CP78) and connections to Kincorth Hill (CP79/103) and Cove Bay (CP78/95/83/81). Gradient, path quality and connections make many of these routes less than fully accessible.



Aberdeen City Council Core Paths

The primary transport corridors for South Aberdeen comprise the A96 (Wellington Road) and the Coast Road together with the Aberdeen-Edinburgh Rail Line which runs from Aberdeen to the southern edge of Bay of Nigg and along the coast.

Proposals are being coordinated through ACC Roads and Nestrans for upgrading to the existing strategic road network, including development of the External Transportation Links to Aberdeen Harbour project (Wellington Road to ASH) to secure improved access to Aberdeen South Harbour. This will include upgrade to the Coast Road to provide additional capacity, a new bridge crossing to replace the existing signalise one-way crossing of the East-Coast Main Line, and active travel provision. ACC Roads Team and Nestrans are currently advancing the Coast Road design to DMRB Stage 2/3. Subject to ongoing design development and approvals, it is understood that the current programme provides for completion in 2026/27.

In parallel, ACC Roads and Nestrans have undertaken early options appraisal and consultation on future travel options for Wellington Road (Wellington Road Multi-Modal Corridor Study, 2021). This seeks to enhance its function as a key multi-modal corridor serving South Aberdeen and strategic development within the Energy Transition Zone and Aberdeen South Harbour. The potential for signalisation of the Hareness Road – Wellington Road Junction (currently a roundabout) has been identified as a potential option, along with additional crossings, bus lanes and active travel infrastructure. The projects are subject to further detailed feasibility, design appraisal, and costing, together with the development of a Scottish Transport Appraisal Guidance (STAG) Report and further work to define the project elements, scope and programme.

The ongoing multi-modal corridor study work by ACC has identified the opportunity for significant enhancement of active travel infrastructure along the Wellington Road corridor, along with bus priority measures. The corridor could also potentially accommodate an Aberdeen Rapid Transit service linking the City Centre to Cove, and onwards to Portlethen. These measures would significantly enhance accessibility for the ETZ masterplan area for active travel and public transport users when implemented, although works are not currently committed. Wider active travel route development in the area (including Craigs Shaw Drive proposal) will broaden accessibility to the ETZ area.



Strava 'Heatmap' showing most frequently used pedestrian and cycle routes across the area (by Strava App users). This illustrates the strong movement corridor along the coast. Connections from St Fittick's to Walker Park and Girdleness Lighthouse, as well as around Gregness, have been interrupted during construction of the South Harbour. There are relatively weak connections between Torry and Tullos Wood.

Aberdeen South Harbour

The development of Aberdeen South Harbour provides strategic marine infrastructure and is one of the key catalysts for the Energy Transition Zone. It commenced initial operations in Q4 2022 and became fully operational in 2023.

The £420million infrastructure development, transforms the marine capacity of the Port of Aberdeen through the creation of over 1,400 metres of deep-water quay and over 125,000 m² of quayside laydown area.

The South Harbour creates a deep-water multi-use facility capable of offering facilities for a range of port and logistic operations. This includes supporting Port of Aberdeen's existing customer base as well as major new opportunities associated with the pipeline of offshore wind activity through ScotWind, with developers actively seeking deep-water port capacity required for deployment.

Aberdeen Airport

The Masterplan area is within 15km of the Aberdeen Airport, and therefore within its 'Aerodrome Safeguarding' area. Future proposed development within the masterplan area will therefore undergo the safeguarding process, including consultation with Aberdeen International Airport, to ensure that there is no adverse impact on aircraft safety. This will include consideration of matters such as building height, external lighting, landscaping, bird hazard management, and impact on communication and navigation equipment.

Rail Infrastructure

The Craiginches freight yards are situated within East Tullos, including a bulk handling facility to the north of railway (accessed from Girdleness Road) and a freight yard to the south on Greenwell Road. The freight yards have limited capacity and currently handle inter-modal container traffic and bulk cargoes primarily concrete.

Opportunities for electrification of the Dundee-Aberdeen rail line are being progressed by Network Rail but are yet to be detailed in full. An EIA Screening was undertaken in 2022 (22/0591/ESC) highlighting works likely to include Overhead Line Equipment, modification to existing bridge structures including potential demolition of bridge access to Ness Landfill (adjacent to Waste Water Treatment Works).

The freight yards at Craiginches offer opportunity to enhanced railfreight capacity for the region. A detailed Railfreight Feasibility Study is currently being advanced by Nestrans to assess the opportunity for expansion of rail freight and modal shift from road to rail / freight servicing. Nestrans are looking to develop a regional infrastructure to support the sustainable movement of freight (marine/rail) and identify areas of opportunity associated with decarbonising rail and connecting Craiginches to nearby hydrogen fuelling facilities.



Rail Infrastructure

Employment Land & Local Infrastructure

East Tullos and Altens industrial estates developed in the 1970's and comprise a diverse mix of industrial, service and distribution users (Class 4 /5 /6) together with research and educational institutions. There are significant voids and under-developed plots and buildings within each of the estates. Land ownership is fragmented with a combination of freehold/leasehold properties.

A large proportion of the available stock is towards the end of its beneficial life and now no longer suits occupiers' needs, especially as tenants seek more energy efficient buildings. Industrial occupiers continue to seek good quality modern industrial space but there is limited new build stock on the market requiring more advanced and speculative development to address shortage. However, build costs and market uncertainty creates a challenging property investment market.

There continues to be a need to extensively refurbish and repurpose buildings and provide industrial space aligned to industry needs.



East Tullos Industrial Estate

• Altens Industrial Estate

Large industrial estate with accommodation ranging from modern office 'HQ' buildings to dilapidated industrial units. It remains well occupied with a high number of energy (oil & gas/renewable) companies with available capacity and well positioned to support energy transition and create new jobs. Through undeveloped plots and poorer quality and vacant buildings, there is potentially significant areas of brownfield land within Altens suitable for development and renewal, including land on Hareness Road and Peterseat Drive.

• East Tullos Industrial Estate

East Tullos has a more diverse user base than Altens, including retail, car showrooms, scrap metal processing, and the newly developed Ness Energy-from-Waste facility. Beyond the higher-value Wellington Road frontage, there are a number of lower quality buildings within the estate and a number of properties are vacant or on interim and short-term lettings. There has been little renewal or investment over recent years (aside from NESS EfW).

Significant opportunity exists to promote brownfield land development and secure further regenerate of the Altens and East Tullos Estates. Integrating both sites into the Energy Transition Zone and will support a diverse cluster of economic activity with on-site training and skills facilities.



Altens Industrial Estate

Net Zero & Energy Infrastructure

Within the masterplan area there has been recent development of energy and utilities infrastructure with the potential to positively complement future ETZ development.

Ness Energy-from-Waste facility

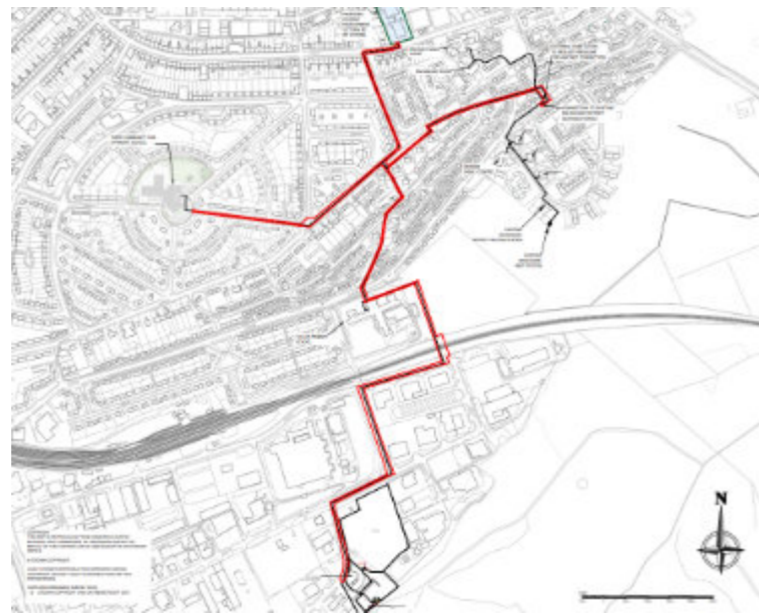
Developed on the former gas holder site in East Tullos, and commenced operations in Spring 2023. It incinerates non-recyclable waste from Aberdeen, Aberdeenshire and Moray Council areas and operates as a CHP plant, with electricity generated sold back to the National Grid.



Ness Energy from Waste Facility

District Heating Network

Linked to the Energy-from Waste Facility Aberdeen City Council are developing a District Heating Network. The development involves up to 2,500m of underground pipework / ductwork / cabling to distribute heat to local housing and community buildings including: Tullos Primary School and community pool, Torry Community Hub, Balnagask Social Work office, and dwellings within Torry. Planning permission (211700/DPP) was granted in 2022 and the first customers are anticipated to be connected in 2023. The proposals would integrate with the existing 'HEATNET' district heating system (installed 2020) that supplies heat from gas boilers to Grampian, Brimmond, Morven Court, Deeside Family Centre, Balnagask House and Provost Hogg sheltered housing.



District Heating Network

Nigg Waste Water Treatment Works (WWTW)

Nigg WWTW was constructed in 2002, at the eastern edge of St Fittick's Park. It processes waste-water from the majority of homes and businesses in Aberdeen – serving a population equivalent of roughly 250,000. Sub-terrain infrastructure (rising mains, combined sewer overflows, outfalls, surface water drains) associated with the WWTW sits beneath St Fittick's Park and at Gregness and are considered in detail in site-specific masterplanning.

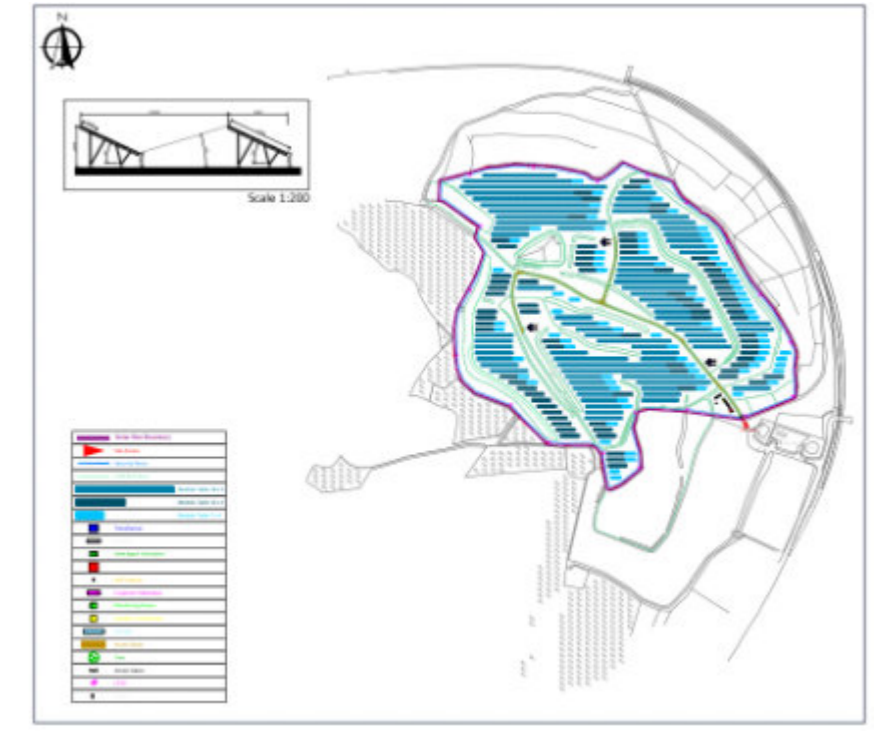


Nigg Waste Water Treatment Works

Solar Farm & Hydrogen Hub

bp Aberdeen Hydrogen Energy Ltd (a joint venture between bp and Aberdeen City Council) are progressing proposals for a Solar Farm on the site of former Ness Landfill to connect to and enable production of green hydrogen at a 'Hydrogen Hub' re-fuelling facility. A planning application (230299/DPP) was approved in June 2023.

The Hydrogen Hub is to be located on brownfield land at Hareness Road (on the eastern edge of Altens Industrial Estate), connected to the Solar Farm via a below-ground cable. It is anticipated this will utilise ground-mounted photovoltaic panels and have potential for 8MW of green electricity generation. Subject to consents, construction is expected to start during 2023 with hydrogen production beginning by the end of 2024.



Solar Farm & Energy Hub



Wetland habitats to be developed and enhanced for amenity & biodiversity benefit



Active and informal greenspace important for residents without gardens



Retained St Fittick's Park areas upgraded in consultation with local communities



Improving water quality will support biodiversity

2.5 Place Context: Community Infrastructure & Local Development

The Aberdeen South Locality Planning Partnership identifies Torry as a priority neighbourhood and provides a partnership forum to plan and deliver improved outcomes across the area. The Torry Partnership has developed a plan aligned with the city-wide Local Outcome Improvement Plan to tackle issues which are of most importance to the local community.

The South Aberdeen Locality Planning Partnership in developing the Locality Plan engaged closely with local communities. Workshops have promoted broad based participation and used the Place Standard to explore local needs and to develop an Action Plan.

The key priorities for the Torry Partnership are summarised below. Development of the ETZ has the potential to support and accelerate delivery of these priorities, especially around employment opportunities, skills & training, and positively shaping place.

SOUTH ABERDEEN LOCALITY PLANNING PARTNERSHIP KEY PRIORITIES:

Economy

- Improving and creating employment opportunities, developing skills, training and support for young people and businesses.
- Reduce number of people living in poverty. Address food poverty and fuel poverty by identifying and using local assets.

People

- Support children and young people to achieve maximum potential
- Focus on early intervention, prevention and re-enablement actions reduce inequalities and improve physical / mental well-being outcomes

Place

- Identify and maximise use of green space; Community food growing and community garden access (inter-generational community gardens)

The Torry Partnership Locality Plan (Aberdeen City – South) Identified Community Priorities.



Wetland management to include control of overgrown species



Developing a new boardwalk to provide close contact with nature



Upgraded paths and path networks to extend access



Retaining and enhancing waymarking and local place features

A programme of investment and regeneration includes a number of active projects currently identified by the community which are either being advanced or for which funding is sought. They include:

Torry Community Hub

Development on the site of the former Torry Academy to include a Primary School (434 pupils), Early Years Provision (100 pupils), Community Hub, Café, Library, sports pitches, Community Space, and access to a range of services. **The Hub opened in November 2023.**

Torry Battery & Greyhope Bay Centre

A viewing and interpretation space (overlooking Greyhope Bay) sited within Torry Battery using re-purposed shipping containers. It provides a café and community space with outdoor seating. It has a decked access walkway for dolphin spotting. The facility opened in 2022 and provides a new destination and focus for activity at Girdleness.

Torry Skate Park – Seeking Funding Support

Through ACC Locality Planning, the prospect of a proposed extension to the existing Skate Park has been explored in order to create a more ambitious and testing experience for young people including incorporation of a bowl, pool and quarter pipes.

Torry Pump Track / BMX or similar – Seeking Funding Support

ACC Locality Planning have also consulted on the potential for development of a new BMX (Pump / Cycle) Track within St Fittick’s Park, providing extended sport and recreation opportunities for young people.

Community Gardens

Within Torry there are several community gardens and areas for local food growing which are well supported and used as places for local gatherings and outdoor social activity.

- Tullos Community Garden has been supported by ACC grant funding since 2018 to regenerate an area of disused land between Tullos Place and Tullos Crescent and has continued to grow.
- St Fittick’s Edible Garden has been created at the former St Fittick’s Council Depot, providing raised planting beds for fruit & vegetables, outdoor seating and space for education, and has plans for herb garden, potting shed and greenhouse.



Torry Community Hub being developed in the heart of the community

03

ETZ Masterplan Framework

Based upon detailed review of local context the Masterplan sets out a framework for development based on core place-shaping principles and aligned to the policy requirements and priorities of the LDP and NPF4. This is expressed in specific development guidance for core sites, and proposals for community and environmental infrastructure across the masterplan area to provide sustainable place-making.

The Masterplan has been prepared in line with ACC's 'Masterplanning Process' Technical Advice Note (TAN) (2010).

It seeks to provide an integrated approach to site planning, urban design, sustainable transport, ecology, landscaping, and community involvement for a range of sites in multiple ownerships over a large area. As required by the Supplementary Guidance the Masterplan includes mapping of local context and key features, key site locations and development proposals, and a framework for landscape and biodiversity across the area. It considers in detail the issues of:

- **Context** – baseline information, planning policy, development vision and objectives, development options and feasibility.
- **Identity** – planning & design principles for successful places – buildings, open spaces & landscape, ecology & biodiversity, infrastructure & services, sustainability.
- **Connection** – accessibility by sustainable modes of transport, external links and access to services, and infrastructure impacts and requirements
- **Communication and Engagement** – Local community and representative groups / bodies, elected Members, statutory bodies and agencies across areas of transport, local environment, cultural heritage, and infrastructure.

Consultation on draft Aberdeen Planning Guidance to be adopted and sit alongside the revised Local Development Plan was undertaken between 24 February and 21 April 2023. This included a revised 'Aberdeen Placemaking Process' which will replace the 'Masterplanning Process' TAN that has informed masterplan preparation, though reflects the same key principles and requirements summarised above.

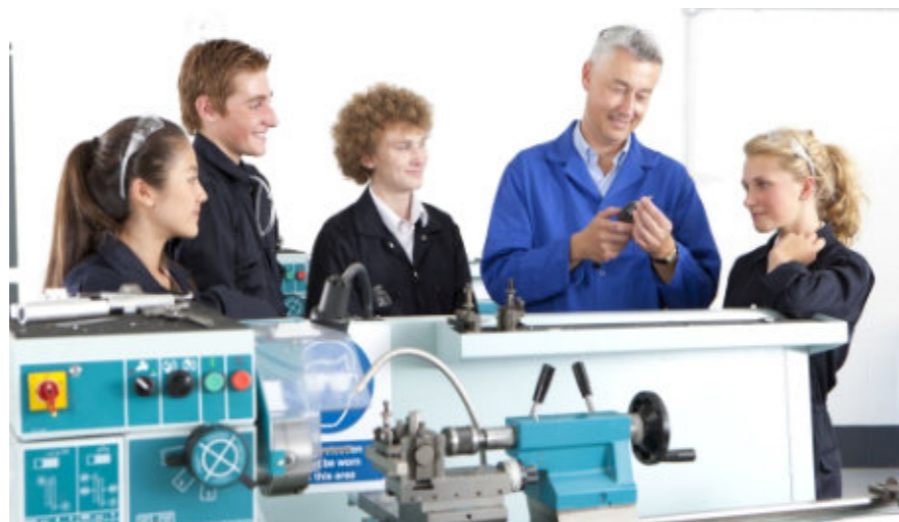
3.1 Masterplan Vision and Opportunity

The vision for the Masterplan is to support the creation of a thriving Energy Transition Zone for the benefit of local people, Aberdeen & the North East, and Scotland as a whole. It must provide a comprehensive framework for development of essential energy transition uses on core Opportunity Sites and integrate enhancements to local environment & biodiversity, community infrastructure, and active travel connectivity.

It aims to support long-term, sustainable economic growth for Aberdeen by developing a cluster of energy transition business activity with a strong focus on innovation, high-value manufacturing and supply-chain growth supporting energy transition and the delivery of new and emerging technologies.

Delivering these objectives requires a coherent long-term plan with clear focus to exploit the regions significant competitive advantages supported by multi-partnered investment to create jobs and accelerate the transition to net zero.

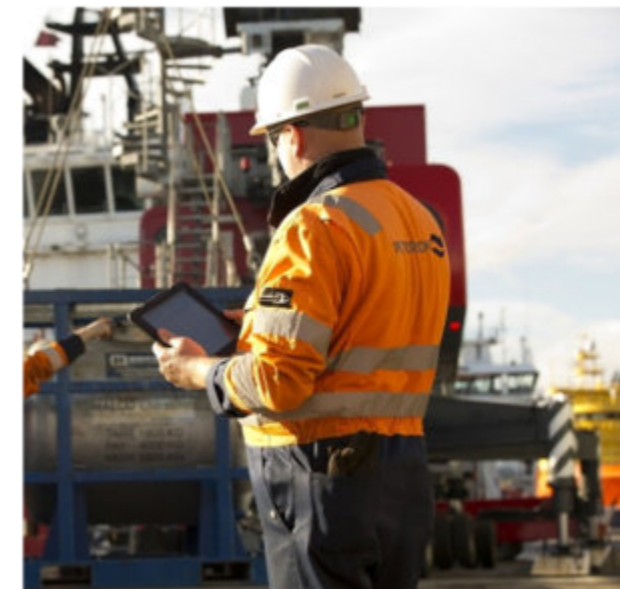
The region is an internationally recognised Centre of Excellence in Offshore Energy (Oil & Gas) and is now transitioning that expertise into Offshore Energy (Wind / Hydrogen) through innovation, inward investment and new business activity. ScotWind and the continued growth in wider renewable energy sectors will transform commercial opportunities, supporting new energy and hydrogen technologies and applications, and growing the business network that links academic/ institutional /regulatory organisations based in Aberdeen with global players, partners and operators.



Apprenticeships and Training Based Employment



Certification and Pre-Deployment Engineering Jobs



Construction & Project Management Jobs

To realise this opportunity the masterplan proposes a framework that supports investment in the core areas of energy transition where Aberdeen has the opportunity to have a leading role. The masterplan focusses on delivery of:

- Market-Ready land supply facilitating development within core sites for business growth, inward investment, new process manufacturing / services including land enabling port-centric activity for high value co-located essential users.
- Measures that address ‘whole-place needs’ and ensure development positively contributes towards delivery of ‘Successful Places’ – especially around health & wellbeing, local connectivity, attractive and distinctive spaces, and nature positive biodiversity solutions.
- Sustainable development of environment, transport and community infrastructures - including new travel connections, innovative low-carbon energy solutions, and efficient use of land, buildings and resources to support net zero targets.

3.2 Masterplan Principles

The Masterplan has defined a series of high-level principles to support sustainable place-making across different sites and contexts. These principles have been derived from local and national planning priorities, arise from key issues and opportunities identified from site analysis, and feedback from local community, consultees and key stakeholders. They establish a set of guiding principles and reference point for the development of more detailed proposals for specific sites.

1. Design & Place Quality

- 1.1 Incorporate high-quality design and landscaping – demonstrating contextual understanding that is sensitive to local qualities of place, landscape, ecology, the wider natural environment and built environment.
- 1.2 Contribute to the delivery of ‘Successful Places’ – designing for Healthy, Pleasant, Connected, Distinctive, Sustainable, and Adaptable places as defined in NPF4.
- 1.3 Provide buildings with high standard of architectural design and detailing that positively adds to the attractiveness of the built environment. Design should have consideration to siting, scale, massing, colour, colour, orientation, details, footprint, proportions and materials to provide a strong and distinctive sense of place.
- 1.4 Positively integrate existing natural and landscape features and identify opportunities to enhance biodiversity and connect to greenspace.
- 1.5 Incorporate and reflect Just Transition principles, ensuring that local communities are able to influence and shape energy transition development and that benefits and opportunities from development are accessible to local people.

2. Environmental Protection & Enhancement

- 2.1 Follow the environmental mitigation hierarchy of avoid, minimise, mitigate, compensate, with particular regard for potential impacts to local environmental assets and the amenity of local communities.
- 2.2 Ensure no net loss of biodiversity and, in line with the mitigation hierarchy set out in Policy 3 of the NPF4, restore and enhance biodiversity within the Masterplan area, and evidence through appropriate assessment and reporting.
- 2.3 Respect local environmental constraints and designations, and identify opportunities to positively integrate existing environmental features, such as woodlands, local greenspaces, and watercourses.
- 2.4 Have regard to local context in the scale and massing of buildings and seek to minimise and/or mitigate impacts to the setting of local heritage sites and landscape character.
- 2.5 Positively enhance the local environment (including biodiversity) across all sites.



Development should positively integrate existing environmental features, such as woodlands, local greenspaces, and watercourses, and seek to enhance connections within and between elements of the Green Network.

3. Land Use Integration

- 3.1 Support delivery of designated Opportunity and Business & Employment sites for energy transition uses with a priority towards securing high-value and employment generating activity.
- 3.2 Integrate with and complement activity at Aberdeen South Harbour, optimising the potential of this critical marine infrastructure as a catalyst for energy transition across the masterplan area.
- 3.3 Safeguard limited land adjacent to the Harbour for specialist activity with specific co-location requirements
- 3.4 Maximise opportunities to redevelop brownfield land within Altens and East Tullos as part of an integrated cluster linked to Opportunity Sites and Aberdeen South Harbour.
- 3.5 Avoid development on Green Belt and Greenspace Network areas unless specifically supported by LDP policy.



Development should complement activity at Aberdeen South Harbour and optimise the potential of this critical marine infrastructure as a catalyst for energy transition.

4. Local Connectivity & Sustainable Travel

- 4.1 Be focused towards key transport and movement corridors that are accessible and have existing or future potential for multi-modal connectivity.
- 4.2 Utilise transport corridors and strategic routes on the Coast Road, Hareness Road, Southerhead Road – avoiding vehicle movements routing through residential areas.
- 4.3 Incorporate active travel connections and infrastructure to link communities, greenspace, employment sites, cultural heritage assets, and local services – supporting local living and the strengthening of 20-minute neighbourhoods.
- 4.4 Support and facilitate planned road infrastructure enhancements, including the Coast Road and Hareness Road upgrades being delivered by ACC (Aberdeen South Harbour External Transportation Links).
- 4.5 Explore opportunities for new road connections that add capacity and connectivity benefits and/or positively complement planned road infrastructure enhancements.

5. Planning for Net Zero

- 5.1 Incorporate principles of sustainable design, taking account of whole-life carbon emissions, energy and resource efficiency, and circular economy.
- 5.2 Seek to conserve and maximise the potential of existing buildings and infrastructure assets through net zero focused retrofit, upgrade, and extension/ redevelopment.
- 5.3 Incorporate flexibility in design and function, allowing for adaptive re-use of buildings and materials over their lifetime, and ‘future-proofing’ for renewable energy technologies.



3.3 Core Masterplan Elements & Enabling Infrastructures

Based on designated LDP 'Opportunity Sites', brownfield land sites, and the surrounding Green Network, the masterplan is structured around five 'Campuses' across the ETZ which will be the principal focus of development for high-value manufacturing and wider supply-chain, innovation, and skills development around energy transition.

The 'Community & Energy Coast' is the sixth core element of the masterplan – comprising a range of projects and place-based interventions to improve the quality of active travel connections across the Green Network, local greenspaces and associated habitats and biodiversity, and local community infrastructures.

Community & Energy Coast

A programme of place-based projects across the masterplan area – representing the investment in enhancing greenspace and green networks, the East Tullos Burn and associated wetlands, local biodiversity, and active travel connections. These projects seek to support and accelerate commercialisation and innovation. High-quality campus design will be suitable for attracting new high-value manufacturing opportunities and supporting supply chain companies.

Marine Gateway

A specialised cluster of activity centred around Aberdeen South Harbour and including land at St Fittick's and Gregness. It is fully equipped to service and supply offshore wind and other renewables markets with deep-water port, marine infrastructure and co-located development sites suitable for high-value manufacturing that will serve as a catalyst for wider ETZ investment.

Hydrogen Campus

The Hydrogen Campus will support the significant low carbon hydrogen production growth opportunity across the region. Green Hydrogen Test and Demonstration Facilities (GHTDF) will form the transformational anchor project to provide “on demand” hydrogen to industrial users and accelerate commercialisation and innovation. High-quality campus design will be suitable for attracting new high-value manufacturing opportunities and supporting supply chain companies.

Offshore Wind Campus

Situated on brownfield land at the eastern edge of Altens, the Offshore Wind Campus will provide a cluster of commercial, manufacturing, test & demonstration, and innovation facilities anchored by the National Floating Wind Innovation Centre (FLOWIC). The Campus will support the growth of a strong offshore wind supply chain as well as opportunities for complementary energy transition activities including a potential site for the bp Aberdeen Hydrogen Energy Ltd ‘Hydrogen Hub’.

Skills Campus

NESCol is situated at the heart of the ETZ Masterplan area and will form the centre of Skills Campus, including new development of an Advanced Manufacture Skills Hub. It will be operated in collaboration with North East Scotland College and provide a range of new training facilities for net zero to deliver the next generation of supply-chain skills & knowledge for Aberdeen.

Innovation Campus

An Energy Incubator and Skills Hub will anchor the Innovation Campus to foster supply chain community building, technology research and development, commercialisation and manufacturing, alongside targeted business support to drive entrepreneurship, innovation and growth. It will include commercial and industrial manufacturing units and space, purpose designed for innovative start-up and growing SME businesses in the energy transition supply chain.

Alongside those core elements the masterplan has considered and identified enabling infrastructures that are either being developed, or will require investment to support activity within the Energy Transition Zone:

Brownfield Land Renewal

A programme of renewal, re-purposing, and re-development of existing industrial land across Altens and East Tullos, with a focus on circular economy and energy efficiency. Maximising the potential of existing assets, enabling market-ready sites, and strengthening the Place quality of industrial estates.

Road Network Infrastructure

Development of the Coast Road with full supporting active travel measures and connections promoting enhanced connectivity including new linkages connecting brownfield land assets and long-term definition of the port boundary and buffer to St Fittick’s Park.

Rail & Freight Infrastructure- incorporating the East Coast Main Line crossing through the masterplan area and the Craiginches Rail Facility providing opportunities for low-carbon freight (potential hydrogen fuelling) integrated within the Energy Transition Zone.

Energy Infrastructure

Sustainably powering and heating buildings across the Zone through renewables and energy-saving technologies. Potential future opportunities will include incorporation of Hydrogen as a low-carbon fuel source and development of local heating networks subject to feasibility.

Utilities Infrastructure & Waste Management

Develop sustainable utility and waste management should be in-built into site development arrangements promoting a Construction & Environmental management approach on all site developments.



Core Masterplan Elements



04

ETZ Campuses

The core elements around which the Energy Transition Zone masterplan is focused are the 5 development Campuses, together with the Community & Energy Coast.

For each of these elements the masterplan sets out a vision for development, identifying potential activities and uses, and taking into account key opportunities and constraints and wider site context. Site specific development and planning guidance is provided through core design parameters and reflecting specific policy and sustainable place-making requirements. These should be followed in the future development of detailed proposals while allowing for future changes in market requirements, technologies and infrastructures which may emerge during future design development and approval stages.

The masterplan seeks to capture placemaking opportunity to ensure all development is well integrated within the specific context and qualities of each site. Across all sites, potential environmental mitigations, compensations and enhancements are identified and reflected in development and planning guidance, along with supporting place infrastructures such as active travel connections, biodiversity measures, landscape planting, and SuDS.



East Tullos Burn 2.0 & Wetlands

Projects

- Burn Channel Extension
- Water quality enhancement
- Habitat enhancement
- East Tullos boardwalk
- Invasive species control
- Park access improvements



St Fittick's Park & Green Networks

Projects

- Park facility enhancement
 - Skate Park / Pump Track / Play
 - Community Growing
- New local parklets
- Tullos Wood Gateway
- Path improvements



Local Biodiversity Eco-System Landscape

Projects

- Pollinator Coast
- Compensatory Tree Planting
- Habitat Management
- Green Roof Developments



Active Travel & Healthy Communities

Projects

- Coastal Footpath
- Tullos Wood path network
- Coast Road Cycleway Link
- Trim Trail & Waymarking

4.1 COMMUNITY & ENERGY COAST

A key focus of the Energy Transition Zone is to build and support sustainable place through more than just economic development. As well as creating jobs and supporting skills and training, ETZ Ltd will work with partners, businesses and the community to accelerate the transition to net zero, positively shape the area, enhance biodiversity and local environmental capacity, and across the Masterplan realise opportunities to build a more sustainable, liveable and productive place in accordance with the principles of NPF4.

The Community and Energy Coast programme is a combination of projects, initiatives and measures across the masterplan area. It seeks to develop a supporting environmental and community infrastructure alongside economic and investment activity. It will involve partnership with communities, Aberdeen City Council, businesses, and third-sector organisations, focused towards realising stronger benefits at the local level and ensuring development is geared towards delivering 'Successful Places'. The programme will form the basis for ongoing community and third-sector engagement, and create opportunities for local participation and empowerment in the delivery of local development that enhances and add to local resources, capacity, assets, and place qualities.

Development Vision

Developed as a diverse programme of investment in the local environment and community – the Community & Energy Coast vision is to support a more inclusive, resilient and successful place that reflects a 'Just Transition' with strong and tangible benefits realised locally. The programme prioritises investment in local greenspaces and community infrastructure, habitats and biodiversity, green networks and active travel connections. It will connect development within ETZ and local communities to the coastline and the wider Green Network – harnessing and building on the area's natural qualities. In parallel to direct investment, ETZ Ltd will also seek to establish a Community Fund to enable community-led activity and participation.

Community & Energy Coast – Key Areas of Opportunity

The Community & Energy Coast programme looks to develop, extend, and enhance core social and environmental assets that serve local needs and priorities. In parallel to the ETZ development proposals on Opportunity Sites, the masterplan has identified the potential for investment and delivery of projects that overlap and intersect around the priorities of:

- **East Tullos Burn and Wetlands** – Protecting the Burn and wetlands and investing in their further enhancement as a thriving wetland eco-system. Enhancement can address **overgrown** species and water quality, building on the previously delivered East Tullos Burn Enhancement Project, and supporting the hydrological and ecological functions of the Burn.
- **St Fittick's Park, Greenspace & Green Networks** – *Greenspace is an important local asset, and St Fittick's Park is valued by the community in Torry. The value of greenspace is determined through a combination of quality, quantity and accessibility. The loss of quantity can be compensated for through enhancement to quality and accessibility. Investing in St Fittick's Park and access to wider facilities across the Green Network can support a higher value, more inclusive greenspace that supports wider participation and use.*
- **Local Biodiversity, Eco-systems & Landscape** – *Providing for no net loss and enhancement of biodiversity across the masterplan area, through protection of key existing habitats, creation of new habitats for priority species, management of existing habitat for biodiversity management and the development of a new landscape framework comprising blue-green infrastructures and woodland planting.*
- **Active Travel & Healthier Communities** – *Supporting new enhanced active travel routes across the masterplan area that provide contact with nature and strengthen accessibility and connections between the Green Network and communities. Providing opportunities for outdoor activity, recreation & leisure, and supporting stronger and healthier communities.*

Across these priorities the Masterplan identifies a range of potential measures and interventions to address the impacts of development, and ensure positive enhancement of local place and environment. At this masterplanning stage proposals are at concept design level – with limited project definition. Through future planning processes they will be subject to detailed feasibility, review, design development, and consultation and collaboration between ETZ Ltd, ACC (both as landowner and local planning authority), and key community and statutory stakeholders. This will assist in finalising the scope, form, and delivery of projects within the Programme – ensuring they are properly coordinated and delivered alongside economic investment, and meet the needs and priorities of the local community as established through further engagement and Locality Planning.

Community & Energy Coast



East Tullis Burn & Wetlands

East Tullis Burn & Wetlands

The East Tullis Burn and the associated wetlands within St Fittick’s Park are highly-valued features of the local environment, providing eco-system services in terms of drainage & hydrology, wetland riparian habitats for wildlife, and adding to the amenity and quality of the park. These are important assets to the community and have a key role in the amenity of the St Fittick’s Park greenspace.

Significant investment was made in the Burn through the 2014 East Tullis Burn Enhancement Scheme, delivered through collaboration between SEPA, the City Council, and the local community. The scheme created improvements to the biodiversity, amenity and water quality of the Burn, and ‘meandered’ the previously straight engineered channel to form the wetlands as they exist today.

The project is illustrative of what can be achieved in nature-based solutions and in providing blue-green infrastructure to support place-making. The masterplan recognises this and has identified retention and further enhancement of the East Tullis Burn as a priority project. Development of an East Tullis Burn 2.0 Scheme would further enhance both amenity and biodiversity, and be essential to delivering a successful and sustainable development within St Fittick’s Park.

While highly successful as a project, there remain issues around water quality and management of the riparian habitats around the watercourse and within the wetlands. **Some species (typha) are overgrown and dominate the wetland habitat, closing out the open-water and hampering the function of the Burn.** There is an opportunity to continue investment in the Burn, extend its qualities as a wetland habitat, and positively manage for greater biodiversity whilst also enhancing its functional hydrology. Targeted investment in nature-based solutions can positively and pre-emptively enhance the local blue-green infrastructure, enhance amenity, add capacity and resilience, whilst also protecting and enhancing biodiversity and safeguarding natural systems.

The masterplan therefore identifies the delivery of an East Tullis Burn 2.0 Project as an opportunity to address existing issues around water quality and landscape management while enabling creation of an accessible development site within the St Fittick’s Park Opportunity Site. This can ensure the Burn is retained within St Fittick’s Park and can sustainably co-exist with future development, and enhance its overall function in terms of hydrology, biodiversity, and amenity.

The East Tullis Burn 2.0 Project would comprise the following elements:

- **East Tullis Channel Extension** of the Burn through local re-alignment, to the north of its current alignment, while still flowing to the existing outfall within Nigg Bay. **The re-aligned section** of the Burn would provide at least equivalent channel width / depth and recreate the ‘meandering’ course of the current Burn to ensure water flow is slowed and wetlands maintained, along with a corridor of native species landscape planting to provide buffer to adjacent development.
- **Water Quality Enhancement** through the introduction of management and pre-treatment of surface water run-off from East Tullis Industrial Estate which flows into the Burn. Measures would attenuate flows to improve water quality and reduce the level of contaminants within the water, enhancing the amenity of the Burn and supporting biodiversity.
- **Wetland Habitat Enhancement** through a combination of landscape management around the Burn with priority for native species, and potential utilisation of vacant land within East Tullis Industrial Estate that could provide additional wetlands complementary to water quality treatment (subject to technical feasibility and ACC Estates agreement).
- **East Tullis Boardwalk** provision to allow closer integration and access to blue-green network and closer contact with nature. Boardwalk (or other similar pathway provisions) should be designed with durable materials and to minimise future maintenance requirements.
- **Typha management programme to manage overgrown species around the watercourse and wetlands, with associated local native re-stocking.**
- **Burn and Park Access Improvements** As part of park mitigation improve blue-green network with access points to water/burn margins and signage.

Delivery of the project is to be led by ETZ Ltd, Aberdeen City Council, and the local community, seeking to build on the success of the 2014 East Tullis Burn Enhancement Scheme. SEPA will be consulted at all stages and closely involved in development of the project as regulator under The Water Environment (Controlled Activities) (Scotland) Regulations 2011.

Detailed design and feasibility must be informed by further development of baseline information around water quality, technical appraisal of existing hydrology and water flow through the burn, and review of channel length, dimensions and capacities to ensure that any amendment to these elements addresses existing issues and enhances the Burn’s hydrological and biodiversity function. Further review of land ownership and surface water infrastructure arrangements within East Tullis Industrial Estate should also inform future technical feasibility and detailed design of measures to address water treatment and quality.

Specifically, the local re-alignment of a section of the Burn will be designed to reflect local topography, with preliminary review of site levels indicating there is not significant technical constraint to local re-alignment. The re-aligned section will continue to flow through the low-lying section of the park and re-connect to the same Nigg Bay outfall. Targeted earthworks will be required to form a diversion and new meandering channel which will be informed by detailed survey and modelling of contours, levels and associated water flow.

The re-alignment of the Burn would be developed in accordance with best-practice and guidance established by SEPA, informed by and forming an extension of technical design work undertaken for the 2014 East Tullis Burn Enhancement Scheme. A CAR License will be required for channel modifications and would be progressed in accordance with the Practical Guide and associated licensing requirements and specific guidance therein for engineering works.

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| Partners | ETZ / Local Community / Aberdeen City Council / SEPA / Scottish Water. |
| Lead Delivery | ETZ Ltd. |
| Programme | 2023-2026 Implementation |



St Fittick's Park, Greenspace & Green Networks

St Fittick's Park, Greenspace & Green Networks

Access to good quality open spaces is important in contributing to a greener, healthier, smarter, safer, stronger, wealthier and fairer places. The existing greenspace and green network are a significant asset across South Aberdeen, providing a wide variety of open spaces (PAN 65 typology) and with a diverse range of function and character that contribute strongly to the qualities of place around Torry and Cove. The greenspace importantly provides a range of local habitats, eco-systems, alongside its recreational function.

St Fittick's Park is valued by the local people both for its proximity, sited immediately next to the community and for its qualities as a greenspace including play facilities, skate-park, paths and trails, woodland planting, wetland habitats and wildlife, and areas of green open space suitable for a range of leisure, recreation, and outdoor activity and relaxation. Consultation and engagement have highlighted a community concern at any loss of greenspace quantity. In planning for greenspace, it is recognised that it is the quality and accessibility of greenspace that is often the most critical factor in determining whether greenspace meets the full range of local needs and delivers a broad range of inclusive benefits to local communities.

The South Aberdeen area and the Torry Community has a high quantity of greenspace (St Fittick's Park and Tullos Football Pitches / Girdleness / Walker Park / Torry Battery / Tullos Wood) and wider managed recreational greenspaces (Balnagask Golf Course) and green network links (Coastal Path / Core Paths / NCR1). Active sport (sports pitches), play (Skate Park / Play Stations / Zip Wire) health and exercise (Outdoor Gyms / Path Networks) community growing (Community Growing-Allotments) are provided for, together with a strong network of paths and informal routes allowing for walking/running and leisure and relaxation. Opportunities for innovative play and exploration are available within the park woodland and path networks.

Development proposals within the OP56 and OP62 'Opportunity Sites' will involve development of existing areas of the park, resulting in the loss of some woodland and a reduction in the quantity of greenspace. It is essential that this is appropriately mitigated and compensated for by enhancing both the quality and accessibility of the park to ensure the greenspace is as inclusive as possible and positively addresses the diverse needs of all age and user groups within the community.

Park enhancement to compensate for any reduction in quantity must include:

- Investing to enhance the function and amenity of greenspace, including greenspace close to homes with outdoor seating, small park amenity areas, and play facilities to encourage time outdoors and outdoor activity.
- Investing in facilities to encourage level of activity/participation and generate additional use. Areas identified within the South Aberdeen Locality Plan include enhancement to the Skate Park and support for a pump-track, extended community growing, and play facilities.
- Investing in improving accessibility to wider greenspace with paths/ trails and waymarking greenspaces that are difficult to access and where path connections offer low security/surveillance and restrict accessibility for those of limited mobility and in vulnerable groups.
- Investing to enhance the path/cycleway network to develop a clearer path hierarchy with primary paths connected to the NCR1 (Coastal Path/ Active Travel Routes) and local circular and exploratory walks creating an easily accessible network of routes for joggers/ dog-walkers /recreational walkers. Additional fitness/outdoor gym elements and measured routes (0.5km/ 1.km/ 3km) all help to extend participation.

Elsewhere, the masterplan has identified opportunities to more closely integrate other elements of the Green Network with communities within Torry and Cove. In particular, Tullos Wood and the Balnagask-to-Cove Coast have strong attributes as greenspaces with a mix of open space, woodland and other habitats, coastal path routes, and excellent views of the city and coast. However, currently these areas are a little more challenging to access with weaker existing connections to local community. The masterplan has identified opportunities for investment to improve their connectivity improve waymarking, add viewpoints and collectively strengthen the quality and accessibility to the Green Network across the South Aberdeen area.

In addition, St Fittick's Church (Scheduled Monument) is situated at the northern edge of St Fittick's Park, and is an important local feature in a prominent location at a 'gateway' to Aberdeen. The setting and surrounding context of the Church has changed significantly in recent years following the development of Aberdeen South Harbour and associated infrastructure, and would be further changed by development within Opportunity Sites at St Fittick's Park.



St Fittick's Park, Greenspace & Green Networks

The St Fittick's Park and Green Network Projects would therefore comprise the following elements:

1. Park Facility Enhancements to mitigate loss of quantity of greenspace with improvements to quality and accessibility of the greenspace, extending and encouraging use across the community, improving access for those of limited mobility and providing additional facilities and reasons to get outdoors and be active. The projects tabled at the consultation that could form part of the park enhancement (to be agreed with local community/ and advanced through co-design) proposed by ETZ are as follows:

- Extension to the small skate park and /or pump track.
- Additional play facilities – particularly facilities for explorative/innovative play.
- Enhancement of opportunities for community growing.

2. Local Parklets providing enhanced park greenspace facilities within currently under-utilised spaces within Torry. To be sited with good and easy access from housing to bring park and civic space close to residents and extend the qualities of the park into the community. Importantly these smaller spaces need to be fully accessible (Older People / Young People / Carers / Neighbourhood Groups, etc), and encouraging the many residents without gardens to be active and use the outdoors. The design and locations of parklets will be confirmed through consultation and be located to offer safe access and good natural surveillance.

3. Tullos Wood Gateway to create a new entrance to the area from within East Tullos to enhance accessibility to Tullos Wood /Tullos Hill and the wider Green Network from Torry. As noted above, existing routes to access the area are limited, and will be further reduced by the Network Rail's planned demolition of the footbridge access crossing the East Coast Main Line, adjacent to the Waste Water Treatment Works .

There is an opportunity to provide a more accessible, legible and direct entrance supported by improvements to surrounding pathways and landscape corridors to strengthen the connection to greenspace including Kincorth Hill / Dee Path Network and the Coastal Path. By providing a safe and accessible route, suitable for a wide range of users, it will extend opportunities for local recreational walking, cycling, outdoor exercise and contact with nature.

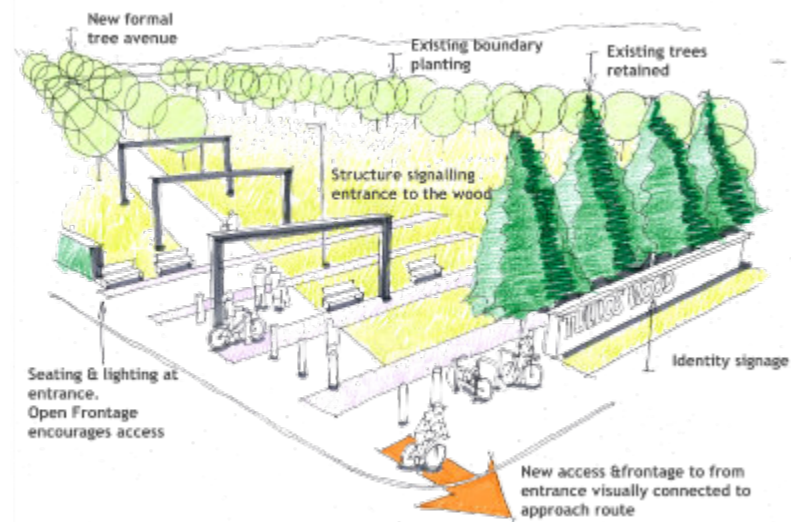
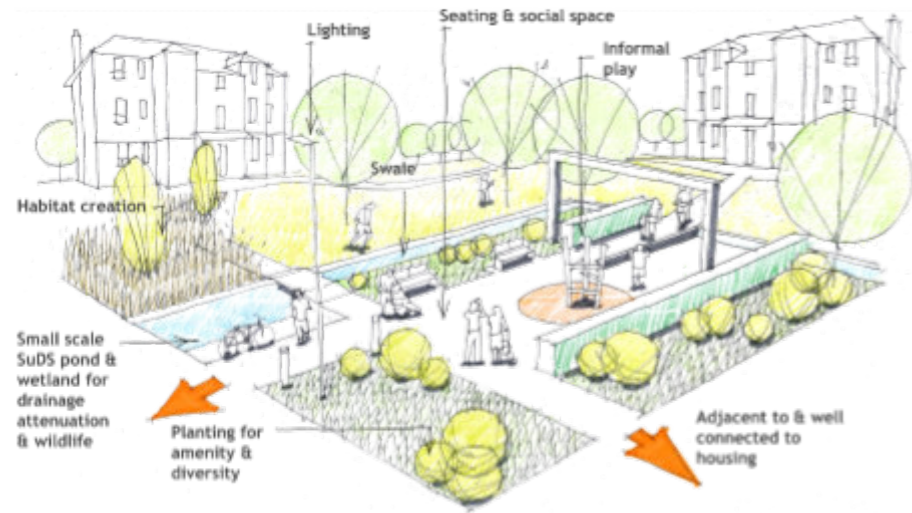
Approaches to improving Tullos Wood access have been considered and explored during community consultation and a detailed option appraisal addressing access, land ownership, gradients and user security is recommended.

4. Path Realignments / Improvements to quality and accessibility of St Fittick's Park will seek to further develop the path network and upgrade paths where necessary (e.g., Girdleness Road / Kirkhill Place / Balnagask Circle/ Coast Road) and strengthen the network to allow more ready accessibility. Improvements in the area of East Tullos Burn would provide for a boardwalk allowing safe access to water margins (wildlife interest/viewing waterfowl/ etc) and contact with nature. Path routing and management can also avoid sensitive habitats and support the sustainable operational management of the wetlands.

5. St Fittick's Church – Interpretation & Restoration – sensitive landscape treatments to the Church and surrounding boundary areas to adapt to changed local context and minimise impacts on setting arising from industrial development and potential road realignment. This would be developed in consultation with HES and ACC Archaeology, potentially incorporating low-level planting, living walls, and other landscape features having particular regard to potential level differences across the area. Additional measures to positively enhance the wider public benefit associated with the Church would also be agreed with HES and ACC, but would be anticipated to include new interpretative signage around the story of the Church and its position within local history, and provision of specialist stonework / fabric repair and/or sensitive up-lighting.

Delivery of the programme and the projects within is to be led by ETZ Ltd, in collaboration with the local community and Aberdeen City Council. Further detailed design and feasibility review will include development of baseline information, and definition of best practice for park, greenspace and habitat development in consultation with the local community and ACC Greenspace and Locality planning team.

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| Partners | ETZ / Local Community / Aberdeen City Council / Locality Planning / Young People / HES & ACC Archaeology (St Fittick's Church) |
| Lead Delivery | ETZ Ltd. |
| Programme | 2023-2026 Implementation |



Biodiversity Protection & Enhancement

Within St Fittick’s Park and across the masterplan area there are a range of wildlife habitats and biodiversity features – including wetlands, broad-leaved and coniferous woodlands, heath, coastal cliff-tops, and open grasslands. Phase 1 Habitat Surveys, along with protected species, wintering and breeding bird, and bat surveys have been undertaken to establish a robust baseline assessment of existing biodiversity, and these will continue to inform detailed site masterplanning in future.

The area has previously benefitted from investment in local biodiversity, including the East Tullos Burn Enhancement Scheme (2014) (described above), as well as the Diamond Woodland Initiative (2012) which involved planting across c. 30 hectares of Tullos Hill with a mix of broad-leaved and coniferous trees. The planting has seen some losses with selective infill and reinforcement required to extend the range of habitat, provide additional tree planting, replace stock losses and enhance amenity. Within St Fittick’s Park mixed plantation has been introduced on an ongoing basis since 2006, to provide a woodland belt screening the Waste-Water Treatment Works.

The LDP provides a policy requirement to ensure at least ‘no net loss of biodiversity’ across the masterplan area, while NPF4 (Policy 3) seeks for development to contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. The masterplan is committed to achieving no net loss of biodiversity across the area and providing positive enhancement of biodiversity assets through a combination of targeted projects and management interventions focused on supporting local habitats.

Development within the Zone, especially on greenfield Opportunity Sites OP56, OP62, and OP61, will have the potential to impact on local biodiversity – most directly through the loss of existing woodland cover and areas of grassland. While avoided and minimised through reduced developable areas, buffer zones, and retention of the most valuable assets (East Tullos Burn), measures to mitigate and compensate are required to ensure a biodiversity net gain is achieved. This includes direct projects led by ETZ to offset and enhance biodiversity within the masterplan area, and more detailed site-specific measures to integrate biodiversity into development through landscape frameworks.

Areas within the masterplan with potential for enhancement to contribute to the area’s biodiversity and habitat connectivity include Tullos Wood, and the former Ness Landfill and the coastal cliff-tops where there is amenity grassland that could be purposefully managed for biodiversity. The masterplan seeks to target these areas for biodiversity projects to mitigate the impacts of development, complement existing biodiversity features and create a connected range of habitats extending across the Green Network at Girdleness, St Fittick’s Park, Tullos Wood, Ness Landfill, and coastal strip.

The Biodiversity Protection & Enhancement Projects would therefore comprise the following elements:

1. **‘Pollinator Coast’** project creating new habitat / biodiversity opportunities within along coastal corridor and Ness Landfill site (invertebrates), adding to and complementing the B-Line initiative in partnership with ACC. The project will involve targeted coastal plant species (Kidney Vetch / Common Rock Rose) that support B-Lines priority invertebrate species Small Blue and Northern Brown Argus, addressing fragmentation and strengthening habitat connectivity across the Green Network. The project will directly enhance the grassland habitat value of the Ness Farm Landfill Site, which offers significant capacity to create habitat for pollinators and can positively co-exist with the bp Aberdeen Hydrogen Energy Ltd Solar Farm proposals. Pollinator planting will also be introduced at selected locations on the coastal path to provide further habitat enhancement and extend the connected nature corridor, taking advantage of linear elements to make habitat connections.
2. **Compensatory & Replacement Tree Planting** additional planting across the masterplan area to extend woodland cover, provide for new native tree planting and address woodland fragmentation. **Development proposals must increase tree and woodland cover, and where tree removal takes place to enable development, replacement planting will be required to ensure an overall net-gain in tree cover. Areas for tree planting will be informed by further detailed survey of existing woodland and opportunities for enhancement identified through a Landscape / Biodiversity Framework, potentially including in Tullos Wood (building on the Jubilee Woods Project).**
3. **Habitat Management** Pro-actively identifying areas within the site for biodiversity enhancement through new work or enhanced ecological management. Development of local biodiversity will be closely aligned to the

Local Biodiversity Action Plan and Nature Conservation Strategy working with the City Council and NE Scotland Biodiversity Partnership and third sector organisations. The community have expressed clear support for biodiversity enhancements and local participation in design, monitoring and management rimes will be encouraged.

4. **Development Landscaping.** Significant areas of development are proposed within existing brownfield industrial estates and new investment within the LDP Opportunity Sites. Across all sites, development will provide green landscaping including tree planting, hedgerows, and other landscape features to enhance local amenity, integrate with surrounding Green Networks and support habitat connectivity. This should contribute to the enhancement of biodiversity in accordance with NPF4. Where appropriate design will look to incorporate green roofs into the roofscape of new and repurposed buildings. Green roofs can improve surface water drainage from buildings, boost thermal performance and support a wider range of habitat in brownfield and intensively used industrial areas.

In addition to the above, the retention and further investment into the East Tullos Burn (see above) is a separate enhancement project that can positively support a significant feature of the area’s biodiversity and protect the wetland habitats within St Fittick’s Park. Delivery of the projects is to be led by ETZ Ltd, in collaboration with the local community, Aberdeen City Council, and NatureScot. Detailed design and feasibility review will include further development of existing baseline information, and definition of best practice for the protection and enhancement of biodiversity and local habitat in consultation with NatureScot, SEPA, NESBREC and others.

Future development proposals should be informed and supported by appropriate assessment and measurement of biodiversity (eg. Strategic Biodiversity Action Plan), ensuring measures are coordinated across the area and demonstrate delivery of overall net-gain in accordance with the requirements of NPF4.

| | |
|----------------------|---|
| Partners | ETZ / Local Community / Aberdeen City Council / NatureScot / NESBP-NESBREC / Third Sector eg. Woodland Trust / Others |
| Lead Delivery | ETZ ltd. |
| Programme | 2023-2026 Implementation |

Active Travel & Healthy Communities

The existing Green Network in South Aberdeen is highly valued by the community for its contribution to local amenity, space for leisure and recreation, and positive impact on health & wellbeing. Across and between elements of the Green Network existing active travel routes have been developed through ACC's Core Paths Network and Cycle Strategy. These offer off-road opportunities for active travel and movement and compliment on-road cycleways/footways.

The completion of Aberdeen South Harbour and the implementation of the Coast Road will include further investment in Active Travel including a new segregated cycle-way on Hareness Road and along the full length of the Coast Road. Active travel segregated cycleway routes will also be provided for within any of the additional links at Peterseat Drive and in the area west of Aberdeen South Harbour

Existing leisure trails and walks such as the Coastal Path, Kincorth & Tullos Hill Trail, and routes around the Torry Battery & Girdleness form part of the network, and across the masterplan area there is approximately 25km of existing routes and pathways. However, in places these are not fully integrated and connected or not fully accessible to all users. Network Rail's planned demolition of the footbridge access to Tullos Wood (adjacent to the Waste Water Treatment Works) will remove an existing access and connection between elements of the Green Network.

Local improvements to paths, waymarking and signage could significantly enhance access and the quality of these routes and Green Network connections. ETZ is therefore seeking to facilitate the development of an integrated Active Travel Network across the area, with emphasis on connecting green spaces at Tullos Wood, Kincorth Hill, St Fittick's, Walker Park, Balnagask Coast, including the National Cycle route 1 (NCR1) and ensuring that employment sites are fully and sustainably accessible.

The masterplan has identified a number of areas where improvements to connections and Active Travel choice can be enhanced and extended as an integral part of the masterplan. These will form part of masterplan-wide mitigation and compensation for the loss of greenspace, extending the range and accessibility of the Green Network, and creating enhanced routes, trails, and pathways that support active and healthy lifestyles.

Active travel interventions will strengthen and contribute to the creation of 20-minute neighbourhoods and liveable places across the communities of Torry, Cove, Balnagask. Creating easy access and providing safe, accessible well-connected walking routes can support active communities with wider health benefits. In addition to these identified projects, individual Campuses within ETZ will positively integrate Active Travel measures (Cycle path connections / Cycle parking/storage to ensure places of work are fully accessible, support low-carbon travel, and enable safe and easy connectivity through the area for all users.

The Active Travel & Healthy Communities Projects would therefore comprise the following elements:

- 1. 'Energy Coast' Coastal Path - Greyhope Road to Aberdeen South Harbour** – targeted upgrade to Coastal Path (Core Path 78) section around Aberdeen South Harbour and Girdleness to include re-surfacing / reinforcement of pathway where degraded, or addressing localised drainage issues, and adding accessibility, wayfinding, and interpretation features (Nigg Bay SSSI). Improving local Green Network quality and accessibility for all communities and provide for health & well-being. All works to be integrated with planned Port of Aberdeen works to footway on Greyhope Road, as well as tied into any future re-alignment of the Coast Road.

- 2. Energy Coast' Coastal Path – Gregness to Cove (Off-Road)** – targeted upgrade to Coastal Path (Core Path 78) section from Gregness to Cove to include re-surfacing / reinforcement of pathway where degraded, or addressing localised drainage issues, and adding accessibility, wayfinding, and interpretation features. Enhancements should maintain the character of the Coastal Path as a sea-cliff recreational walking route (up to 1m width), ensuring the Local Nature Conservation Site and local habitats (nesting birds) are not negatively impacted. Works to be integrated with and tie into planned Port of Aberdeen works to reinstate Coastal Path around Gregness headland upon completion of Aberdeen South Harbour construction.

- 3. Tullos Wood Path Enhancements** to upgrade and waymark walking routes within Tullos Hill /Tullos Wood, creating accessible connections between the historic cairns (Scheduled Monuments) that positively draw on the area's cultural heritage and link this to healthier and more active lifestyles with defined path routes. This should also incorporate vantage points with views to the Coast and City, and wider connections to the surrounding Green Network including Kincorth Hill, Coast, and Girdleness.

Path upgrading, connections and waymarking can help support easier access and encourage more active lifestyles. Being more active, spending time outdoors and doing regular moderate exercise provides major and long-lasting health benefits.

- 4. Coast Road Cycleway Links** completion of segregated cycle lanes within the upgraded Hareness Road Corridor / Coast Road and provision of connecting link roads at Peterseat Drive ASH Road Links.

- 5. Outdoor Exercise and Health/Well-being** exercise stations can form a useful addition on path networks to support active recreation and promote regular exercise - supporting 'Healthy' Places in accordance with NPF4. NHS Choice advises that undertaking regular exercise offers a wide range of health benefits and promotes walking for health, cycling and gentle, daily exercise. 'Trim trails' and exercise stations can make exercise fun and be part of family or group exercise.

Delivery of the projects is to be led by ETZ Ltd and in-part by Aberdeen City Council in connection with planned works to the Coast Road. They will be delivered in collaboration with the local community, Aberdeen City Council, Nestrans and NatureScot. Detailed design and feasibility review will further development of the baseline information around local walking and cycling connectivity, and define best practice for development of active travel infrastructure in consultation with ACC Officers, Nestrans and others.

| | |
|----------------------|---|
| Partners | ETZ / Local Community / Aberdeen City Council / NESTRans / NatureScot |
| Lead Delivery | ETZ Ltd |
| Programme | 2023-2026 Implementation |



COMMUNITY & ENERGY COAST

The range of potential measures and projects identified through the 'Community & Energy Coast', and how these relate to development and other features across the masterplan area are shown on the indicative plan below.

Further detail of these measures will be set out within future planning application(s) and subsequently secured through planning conditions / obligations.

These are further expressed in relation to specific development sites within Campus Guidance in Section 4 and Masterplan Delivery in Section 6.

Illustrative Plan Community & Energy Coast

- 1 **Tullis Wood Gateway & Path Connections** – enhancing accessibility to Tullis Wood from Torry through provision of a more accessible, legible and direct entrance to the Wood, utilising brownfield land within East Tullis Industrial Estate. Associated pathway and landscaping improvements will connect to the new Gateway, enhancing connectivity across the Green Network.
- 2 **St Fittick's Park Facilities** – improving the quality of facilities within St Fittick's Park through a combination of extension to the skate park and/or BMX Pump Track, provision of additional play facilities, or creating opportunities for community good growing. To be developed and defined through further engagement with the local community and advanced through process of co-design.
- 3 **East Tullis Burn 2.0 Project** – retention and enhancement of the East Tullis Burn and wetlands, building on the success of the 2014 improvements works. Local realignment of a section of the Burn is proposed to enable development, and measures are identified to improve water quality, manage **overgrown** species, and enhance wetland habitats as part of overall biodiversity enhancement.
- 4 **Local Parklets** - providing enhanced park and local greenspace facilities within currently under-utilised open space in close proximity to housing – extending access and adding to local amenity. Specific locations and amenities within Parklets to be confirmed through further consultation and in coordination with ACC.
- 5 **Pathway & Active Travel Improvements** - Core Path and other walking routes through development sites at St Fittick's, Gregness, and Doonies to be re-instated and enhanced to maintain connectivity through the area and ensure full accessibility across the Green Network. Tying into and connecting to wider active travel routes across the masterplan area including NCR1 and enhancements being delivered through ACC upgrade of Coast Road and Hareness Road.
- 6 **'Energy Coast' Coastal Path** – upgrade to existing Coastal Path to include targeted re-surfacing / reinforcement of pathway where degraded, and provision of interpretation and way-finding features to enhance overall quality– while maintaining current character as a sea-cliff recreational walking route and avoiding impacts on adjacent habitats.
- 7 **Pollinator Coast** - strengthening habitat connectivity and overall enhancement of biodiversity at locations across the Masterplan (including Development Sites) through targeted pollinator planting – complementing ACC B-Line initiative with coastal plant species to support priority invertebrates.
- 8 **Compensatory and Replacement Tree Planting** – provision of tree planting across the masterplan area (with a priority for native species) to extend woodland cover and provide replacement for areas of tree loss as a result of development. Specific locations and species to be informed by woodland survey and developed through a Landscape / Biodiversity Framework.
- 9 **Outdoor Exercise** – outdoor exercise and fitness stations can be integrated to path networks or around existing park facilities – adding to the quality and range of facilities within the Green Network and supporting local health & wellbeing.
- 10 **Development Plot Landscape Frameworks** - incorporating a range of measures within Development Sites to support overall enhancement of biodiversity and habitat connectivity – including landscape planting to support amenity and integrate with surrounding Green Network as well as potential green roofs and living walls adding to the 'Pollinator Coast'.
- 11 **St Fittick's Church Interpretation & Restoration** – addressing the impact on the setting of the Scheduled Monument through landscape mitigation, and enhancing its status as a key asset to St Fittick's Park through new interpretive signage and specialist stonework / fabric repair (to be developed in consultation with ACC Archaeology / HES).

Community Fund

In addition to the potential for direct investment and delivery of projects through the Community & Energy Coast Programme, ETZ Ltd are exploring the establishment of an annual Community Fund for 2023-2028. This would provide support to local community groups and charities meet their aspirations and ambitions.

The Fund would operate as a stand-alone commitment by ETZ Ltd to the communities in closest proximity to planned development. It aims to support smaller, local initiatives and programmes led by the community and directly addressing their priorities. Funding would be awarded on a grant application basis to local projects that supported or enable community participation, local social and environmental resilience, energy transition, youth activity and out-reach – example projects might include community events, food-growing and community garden expansion, or energy-efficiency improvements to community assets.

Development & Delivery

The Community & Energy Coast programme comprises committed projects across the masterplan area, that will be led by ETZ Ltd working in collaboration with partners over a phased programme of delivery.

The projects provide essential mitigation and compensation for the potential impacts that may arise from economic development within the ETZ, particularly at St Fittick’s Park, Gregness, and Doonies. Projects identified within the Community & Energy Coast programme will be aligned to wider development site delivery and infrastructure, with the timing of delivery secured through pre-commencement planning conditions / obligations to ensure core elements of mitigation are delivered in advance of, or in parallel with, development as agreed with Aberdeen City Council.

Outside of development sites / Campuses, the future management and maintenance of environmental enhancements and physical infrastructures delivered as part of the Community & Energy Coast will be subject to future arrangements between ETZ Ltd., ACC, and developers. In all cases maintenance and upkeep requirements should be minimised at design stage, and it is recognised that funding endowment(s) for ACC adoption and/or private agreement(s) around maintenance may be required, depending on the final nature of projects and infrastructures.

| | |
|----------------------|---|
| Partners | ETZ / Locality Planning Team / Aberdeen City Council / Local Community / Young People |
| Lead Delivery | ETZ ltd. |
| Programme | 2023-2028 Implementation |

St Fittick’s Park & Greenspace / Green Networks

East Tullos Burn

Biodiversity Protection / Enhancement

Active Travel & Healthier Communities

Community Fund



Indicative Delivery Timeline - Community & Energy Coast



Marine Gateway

Page 76

4.2 MARINE GATEWAY

Offshore renewables, especially offshore wind, is major economic opportunity for Aberdeen and the North-East. Aberdeen South Harbour has been developed as a major infrastructure asset with the capability to service and support investment in offshore renewables generated through the ScotWind licensing for the period 2025-2050 and beyond.

The Marine Gateway is centred around Aberdeen South Harbour and incorporates land at St Fittick's Park and Gregness which are within Opportunity Sites OP56 and OP62 allocated within the LDP. It provides a focus within the Energy Transition Zone for specialised offshore renewables activity that has specific operational requirements linked to marine infrastructure and logistics, including uses requiring port co-location to enable direct transhipment of manufactured and fabricated goods for offshore deployment. The Harbour was conceived in advance of the current energy crisis and ScotWind Licensing, which has significantly advanced the scale of Scotland's offshore wind ambition and created additional demand for land across all Scottish East Coast ports in order to achieve this. The Harbour has very limited developable land suitable for large-scale manufacturing, component fabrication and service support. Optimising available space and efficient use of land around the Harbour will be critical to meet future demand and to seize significant economic opportunities from energy transition – as recognised by the LDP and NPF4.

Development Vision

Developed as a high value integrated port and manufacturing hub the Marine Gateway is the leading deep-water port of the NE Coast with activity forming a catalyst for wider investment across the ETZ and Region. Port co-located investment in manufacturing, fabrication and renewable technologies supports an extensive local supply chain providing goods and services for offshore activity. Direct port access has secured specialist manufacturing investment creating a regional cluster of renewable energy companies supporting ScotWind.

Marine Gateway – Planning & Policy Overview

The Marine Gateway incorporates land at St Fittick's Park, Gregness and within Aberdeen South Harbour. These areas are included within the Opportunity Sites OP56 (St Fittick's Park) and OP62 (Bay of Nigg) as designated within the LDP, as well as being covered by Policies B4 and B5 relating to Aberdeen Harbours and Energy Transition Zones, respectively.

The Bay of Nigg Development Framework was adopted in 2016 as proposals for Aberdeen Harbour expansion were developed, to plan for necessary infrastructure and to maximise impacts of investment for business and communities. The Framework pre-dates the current planning policy context (LDP and NPF4) as well as wider acceleration of Scotland's transition net zero (Climate Change Plan and Energy & Just Transition Plan) and the significantly increased scale of offshore renewables ambition (ScotWind Leasing Round). While identifying a potential road link from East Tullos to the Harbour (across St Fittick's) it did not identify land within St Fittick's Park or Gregness as potential development opportunities (consistent with LDP policy at the time).

The OP56 Opportunity Site allocations contains a significant area of St Fittick's Park (along with the Nigg Bay Waste Water Treatment Works and Railway). A small area at the north of the park is within the OP62 Opportunity Site and has been used as a temporary storage area associated with construction of the Harbour.

The OP62 Opportunity Site contains the Bay of Nigg and associated coastal land required for development of the Harbour. This includes Gregness as a large coastal site sitting above the Harbour, which currently has a temporary consent (170156/MSC) for marine revetment structure manufacturing and construction compound associated with the Harbour construction.

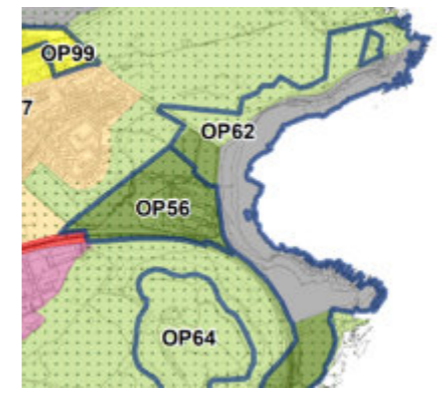
As previously noted, the recently adopted NPF4 supports the regeneration of existing industrial land and re-organising land use around the South Harbour in line with the spatial strategy of the LDP. It recognises that Aberdeen Harbour is a strategically important asset for the economy of North-East Scotland, and that the South Harbour specifically can act as a cluster of port accessible renewable energy research, manufacturing and support services.



| POLICY | Summary Extract |
|------------------|--|
| OP56 | <i>"This site, along with OP61, will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring 'roll on / roll off' level access to the South Harbour".</i> |
| OP62 | <i>"Aberdeen Harbour expansion. Bay of Nigg Development Framework approved"</i> |
| Policy B4 | <i>"There will be a presumption in favour of harbour infrastructure and ancillary uses, which are required for the effective and efficient operation of the harbour, and which have a functional requirement to be located there. This may include administrative offices, warehousing and storage (including fuel storage), distribution facilities and car/HGV parking. Other harbour-related uses will be treated on their merits".</i> |
| Policy B5 | <i>"There will be a presumption in favour of the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries; this includes offshore wind, tidal, hydrogen and solar...Development proposals will be required to include suitable open space and landscape enhancements for the well-being of people and wildlife"</i> |

The LDP requires for Opportunity Sites OP56, OP61 and OP62 that masterplanning specifically considers the following matters:

- The extent of developable areas within B5 Energy Transition Zone zoning.
- Areas which should remain undeveloped and the extent of any buffer zones.
- Mitigation measures to ensure the continued viability of linear habitats including the East Tullos Burn, recreation and Core Path network.
- Options for the use of the waste-water treatment plant.
- Measures to avoid, minimise, mitigate, and compensate potential impacts on biodiversity and greenspace that will ensure at least no net loss of biodiversity across the masterplan area.



Local Development Plan (LDP)

Marine Gateway – Opportunities & Constraints

St Fittick's Park & Aberdeen South Harbour

The Marine Gateway incorporates both the essential marine infrastructure and co-located high value manufacturing sites that will be the catalyst for investment across the zone. The Harbour and development sites can provide a port-integrated cluster of energy transition activity, forming a competitive market proposition that is well positioned to attract major inward investment by specialist operators.

The Harbour provides 1,400 metres of quay at water depths of up to 10.5 metres (LAT), with a turning circle of 300 metres and a channel width of 165 metres. The quays provide operators with flexibility and capacity to accommodate heavy lift capability and transfer of extra-heavy loads (6,000 tonnes plus) with fully segregated quay and apron drainage systems, incorporating interceptors, for controlled operations.

Land within the Opportunity Sites OP56 and OP62 offers the potential to create development platforms with direct and contiguous access to deep-water quaysides at the Harbour, and to be functionally integrated with Harbour operations. Integration with the port and capacity to transport extra-large and/or heavy and specialised equipment between manufacturing facility and quays (e.g., Anchors, Cables, Sub-Sea Structures), or to provide specialist quayside services (Operation & Maintenance / Certification) is key for offshore renewable operators.

The Coast Road currently forms the boundary between St Fittick's Park and the Harbour – linking northwards into Torry (Victoria Road) and southwards towards Gregness and industrial land within Altens. To maximise land area contiguous with the Harbour, strengthen connectivity between manufacturing sites and the Harbour, and to minimise potential for road user conflicts, the potential for the re-alignment of the Coast Road within the Marine Gateway has been identified as an opportunity. Realignment could provide a defined boundary and partial buffer between industrial activity within the Harbour and nearby greenspace and be designed to facilitate movement of heavy goods to quayside. Subject to specific operational requirements this may involve a managed crossing to facilitate inter-connectivity between the OP56 site and Harbour.



St Fittick's Park is a public greenspace that is valued by the community for its amenity and contribution to local environment and character. The Park is part of the ACC Core Green Space Network, and provides a large, multi-use open space extending from Balnagask and bounded by St Fittick's Road, Coast Road and the East-Coast Mainline Railway

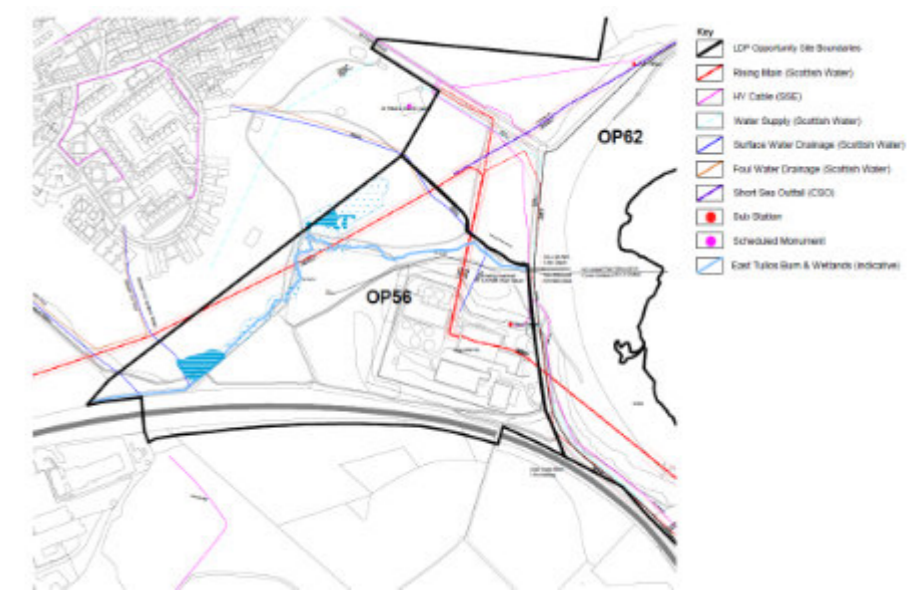
The Park also contains St Fittick's Church (Scheduled Monument) and the East Tullos Burn which serves an important drainage and hydrological function and provides wetland habitats. The Waste-Water Treatment Works situated within the park is served by significant sub-terrain infrastructure, including rising mains and sea outfalls. Each of these features and assets require careful consideration in development proposals to ensure that impacts are minimised, and in the case of St Fittick's Church and East Tullos Burn to explore opportunities to enhance their contribution to the overall amenity of the Park.

In particular, the East Tullos Burn and wetlands is a key feature within the park which was subject to significant investment in 2014 to improve water quality, enhance biological capacity, and create a biodiverse wetland habitat. Delivered through collaboration between ACC, SEPA, and the community the project 're-meandered' the Burn and provided new landscaping (wetland / wildflower planting) along with new access paths. The project and surrounding greenspace woodland has now matured and provides an important biodiversity, hydrological, and amenity function, enhancing the qualities of the park as a local greenspace.

The Nigg Bay Waste-Water Treatment Works (WWTW) situated within the park is served by significant sub-terrain infrastructure, including rising mains and sea outfalls which must be considered in the siting and configuration of development. **A plan of the Scottish Water infrastructure and other utilities around the site is provided below – though the specific location of these and associated wayleaves should be confirmed with relevant service providers (SSE / Scottish Water / SGN).** The potential for odour from the WWTW must also be considered for future development, and the potential for an Odour Impact Assessment may be required depending on end user.

Opportunities for incorporation of the WWTW into the Marine Gateway have been considered through masterplanning, **including discussion and feedback from Scottish Water.** The facility has specific operational requirements and specialist infrastructure associated with large-scale water treatment, limiting opportunities for future integration into energy transition development. The facility serves a significant proportion of the Aberdeen City and **Aberdeenshire** region, such that its re-location or change to treatment processes would incur **significant costs and disruption** and have implications for waste-water treatment across the area and is not considered feasible. Potential synergies around utilisation of waste-heat or effluent from the facility may still emerge depending on end-users within development sites and future technical innovations, and these should be explored through ongoing coordination with Scottish Water.

Potential development within St Fittick's Park and at Aberdeen South Harbour is also in close proximity to existing homes within Torry (Balnagask Circle / Pentland Crescent). Ensuring that impacts on local amenity are minimised may constrain the scale and type development that can be delivered.



Utilities Infrastructure Constraints Plan



Aberdeen South Harbour

Illustrative Concept
High Value Energy Transition Manufacturing Co-located with Port

Gregness

The development area at Gregness is not capable of direct co-location with the Harbour but benefits from immediate proximity and ability to transport materials to the Harbour over a very short downhill distance (c. 500m) via the Coast Road. Site development is constrained by sub-terrain Scottish Water infrastructure (rising main and sea outfall), access requirements to the Harbour breakwater, and placement of its sector light which is essential to ship navigation. A coast-guard lookout station and antenna sit at the western edge, with a fenced boundary and functionally separated from the remainder of the site. The site’s exposed coastal cliff-top setting makes it a prominent and visible location, necessitating careful consideration of landscape in building design and configuration.

Areas within the OP62 Opportunity Site at both Gregness and St Fittick’s Park have been utilised as compounds by Port of Aberdeen during the course of Aberdeen South Harbour construction. Development of these areas must be coordinated with the Port, taking account of committed reinstatements and wider mitigations associated with the South Harbour and incorporating these where feasible alongside future development proposals, whilst ensuring delivery against latest LDP Opportunity Site allocations and land use priorities therein.

In particular, the Coastal Path (Core Path 78) routes around the cliff-top edge of the Gregness site, though has been inaccessible as a result of the construction compound on the site. There is an existing planning requirement for the Coastal Path to be re-instated upon completion of the Harbour construction works which should be reflected in future proposals for the site.

The Nigg Bay Site of Special Scientific Interest is located at the south-west of Nigg Bay, consisting of exposed cliff face and foreshore. It is designated for its geological features, noted as a classic locality for quaternary stratigraphy in north-east Scotland. It is separated but in close proximity to developable areas at Gregness, and will require careful assessment of the potential for impacts from development, including during the construction period.

These constraints limit the principal development area to the north of the site, broadly mirroring the footprint of the existing construction compound. It presents the opportunity for manufacturing / industrial development producing large-scale components, materials, goods to support energy transition. Areas to the south of the site may be appropriate for associated storage, or smaller-scale energy transition uses that may benefit from a coastal location and/or proximity to the Harbour.

While the Harbour and OP56 and OP62 Opportunity Sites represent a major economic and energy transition development opportunity, existing land uses, site infrastructure, and blue-green network assets provide constraint, and a balance is required between development and protecting both greenspace and biodiversity assets.

Development within the Marine Gateway therefore requires coordinated planning that appropriately addresses opportunity and constraint to achieve sustainable development. This means incorporating measures to avoid and minimise environmental impacts such as landscape buffers, as well mitigation and compensatory provision including investment in local biodiversity, amenity, and retaining and improving accessibility to greenspace.

| Opportunities | Constraints |
|---|---|
| <ul style="list-style-type: none"> • Co-located investment sites with potential Aberdeen South Harbour integration. • Development site(s) suitable and safeguarded for high-value manufacturing and energy transition use. • Enhancement of St Fittick's Park & East Tullos Burn. • Coast Road re-alignment to unlock additional contiguous land areas. | <ul style="list-style-type: none"> • Valued local greenspace and park. • East Tullos Burn and wetlands – key hydrological and ecological asset. • St Fittick's Church Scheduled Monument and local landscape character. • Scottish Water Waste-Water Treatment Works and associated below ground infrastructure. • Proximity to existing residential communities within Torry & Balnagask. |



Aberdeen South Harbour

Former Ness Landfill site

Retained East Tullos Burn & Wetlands supporting enhanced biodiversity

**Illustrative Concept
High Value Energy Transition Manufacturing Co-located with Port**

Investment & Development Proposition

The Marine Gateway is a location of active investment interest from energy transition and offshore renewables operators. Identified sectors for high-value, energy transition related development with strong co-locational requirement that could be accommodated on development plots within the Marine Gateway include:

| High-Value Energy Transition Activity | Port Co-Location Requirement |
|--|--|
| Cable Manufacture | Large scale manufacturing of offshore cable Requirement for spooling of specialist HV cables directly from quayside to factory and factory to quayside for offshore deployment. |
| Sub-sea Engineering (Seabed Infrastructure, Chains, Anchors, Moorings) | Large/heavy components manufacturing requiring marine import/export of goods and requiring deployment ship-shore. Scale and weight limits mobility and require port integrated site for offshore deployment. |
| Tower and Foundation Structures, transition piece, floating offshore wind platforms, spars, etc | Large/heavy components manufacturing requiring marine import/export of goods and requiring deployment ship-shore. Scale and weight limits mobility and require port integrated site for offshore deployment. |
| Certification / Testing, Remote Sensing, Sub-sea Inspection, Robotics | Specialist port servicing and technology-based testing at final deployment linked to O&M activity. |
| Operations & Maintenance - Fixed & Floating Assets - (Offshore Wind) | Quayside 24/7 requirement for Operational and Maintenance of windfarm assets (fixed/floating) including operational management and transfer of crew to/from vessels. |

The Scottish Government and Crown Estate Scotland (CES) have established within the ScotWind Leasing process a requirement on local content for offshore wind projects.

The Offshore Wind Sector Deal set a target of 60% lifetime UK content in domestic projects and a commitment to increase UK content in the capital expenditure phase. Under the agreement, offshore wind developers are required to set out their supply chain commitments and a total of £21bn has been committed to the Scottish supply-chain from ScotWind North Sea offshore wind farms. Port access is fundamental to much of the offshore wind supply chain and Aberdeen has the potential to attract a significant share of this investment.



In 2022 CES also launched the Innovation and Targeted Oil & Gas Leasing Round (INTOG) for offshore wind projects that will directly reduce emissions from oil & gas production, adding to the future pipeline of North Sea offshore renewables activity.


As a port co-located development proposition, the Marine Gateway is a critical component of the Energy Transition Zone. It provides the opportunity to attract highly specialised and employment generating activity such as high-value manufacturing for renewable energy technologies and servicing the full life-cycle of offshore renewables. Development within the Marine Gateway should be a catalyst for wider investment and supply-chain development across the area, including in Altens and East Tullos, through active management and coordination by ETZ Ltd, Port of Aberdeen, ACC, and private landowners to maximise combined impact.

Development Guidance

Development within the Marine Gateway should work within the identified constraints as far as possible. It must seek to achieve a balance that provides high-value, employment generating development that contributes to net zero objectives, while limiting its footprint and preserving key assets within the park including East Tullos Burn and wetlands. As a result, the overall maximum developable area identified by the masterplan is approximately 7-8 ha, compared to the 15.3 ha of OP56 and OP62 Opportunity Site designations within the Park.

Within a reduced developable area, the Masterplan seeks to configure multiple plots that are functionally integrated within the Harbour, with scale and typology that respects site constraints. Two principal plots suitable for high-value manufacturing and close integration with the Harbour are identified (St Fittick’s and Gregness), plus a flexible plot directly contiguous with the Harbour enabled by a potential re-alignment of the Coast Road.

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|---|--|
| <p>Land Use</p>  | <p>Land use within the Marine Gateway should comprise flexible Class 4 (Business)m Class 5 (General Industrial) and Class 6 (Storage & Distribution) uses. Larger development plots within St Fittick’s Park and Gregness should be suitable for specialised high-value manufacturing activity associated with energy transition. Development elsewhere within the Marine Gateway should support renewable energy and/or marine-related activities that deliver economic benefits around job creation and add value to the local economy.</p> <p>As required by the LDP, any development at the OP56 site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring ‘roll on / roll off’ level access to the South Harbour.”</p> <p>Opportunities for future collaboration around sustainability or circular economy associated with WWTW operations should be coordinated with Scottish Water.</p> <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> • Local Development Plan Policies: B4 (Aberdeen Harbour) and B5 (Energy Transition Zone). • National Planning Framework 4 – National Development 14. |
| <p>Design Quality</p>  | <p>Development within the Marine Gateway should:</p> <ul style="list-style-type: none"> • Create flexible investment sites capable of meeting future market requirements, while minimising greenspace land-take and safeguarding key local environmental assets. • Provide industrial buildings of high-quality design, incorporating sustainable and durable cladding, materials, and detailing that positively add to the built environment and local character. • Provide building heights reflecting standard industrial typologies, typically in the range of 10-15m (eaves height) subject to land uses and specific end-user requirements. Further design development should be informed by Landscape & Visual Impact Assessment to inform plot specific approach to height, massing and building form. • Secure and allow for close integration with the Aberdeen South Harbour operational areas and quays – while providing clear long-term and secure port boundaries. • Provide for sustainable development that minimises resource use and total energy demand through passive and active measures, and where feasible integrate renewable energy technologies within development. • Where feasible, incorporate green / living walls and roofs, landscape planting, and creative elevational design to the west-facing building façades. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> • Local Development Plan Policy: D1 (Quality Placemaking), D2 (Amenity), D3 (Big Buildings), D4 (Landscape), D5 (Landscape Design), D6 (Historic Environment), R6 (Low and Zero Carbon Buildings). • ACC Supplementary Guidance: Big Buildings, Landscape, Resources for New Development. |

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| <p>Transport & Connectivity</p>  | <p>Development within the Marine Gateway should:</p> <ul style="list-style-type: none"> • Create safe and attractive routes for walking and cycling across the area - ensuring active travel routes link to employment sites and make connections to wider Core Path and leisure path networks. • Consider options for road re-alignment across an area of St Fittick’s Park (within areas zoned for Energy Transition Zone), to provide a contiguous developable area linked to the Harbour and forming a new boundary with the Park. Road re-alignment should be closely coordinated with Port of Aberdeen to arrange points of access and ensure connectivity (including for public transport) to/from the Harbour. Inter-connectivity and operational association between development within OP56 and the South Harbour is likely to require a managed crossing (depending on end-user operational requirement) which will require careful coordination and management to ensure appropriate road safety (in consultation with ACC and Port of Aberdeen). • Options for road re-alignment should incorporate full active travel provision (walking and cycling) and maintain continuity of existing routes (Core Path 78 and National Cycle Network). • Provide access points to development sites from priority junctions, suitable for heavy-load vehicle movements. Points of access should promote traffic movements south-ward, connecting to the Coast Road /Hareness Road corridor. Access to the OP56 site will require crossing over re-aligned section of the East Tullos Burn which should be designed to minimise impacts on the watercourse. • Support Active Travel integration with covered and secured cycle parking facilities, along with car parking in accordance with ACC Standards (including EV Charging to support low-carbon journeys). • Proposals should be coordinated with planned ACC enhancement work (including road widening) to the Coast Road, noting potential for associated land requirements within the OP62 site at Gregness to enable construction of planned bridge crossing. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> • Local Development Plan Policies: T1 (Land for Transport), T2 (Sustainable Transport), T3 (Parking). • ACC Supplementary Guidance: Transport & Accessibility. <p>In addition to planning requirements, the detailed design of any road infrastructure within the Marine Gateway should have regard to relevant standards within the Design Manual for Roads & Bridges, National Roads Development Guide (SCOTS), and be developed in close consultation with ACC Roads officers.</p> |
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Infrastructure



Development within the Marine Gateway should:

- Ensure wayleaves and stand-off zones to below-ground infrastructure connected to WWTW are agreed with Scottish Water. Any future proposals that may involve re-configuration of this must ensure advance review of technical feasibility in collaboration with Scottish Water.
- Allow for ducting and wayleaves as appropriate to future-proof development connections to potential utility and renewable energy networks which may emerge within ETZ.
- Support improvements to water quality within East Tullos Burn (see Landscape & Environment Guidance).
- Ensure that all development is designed to be flood resilient and does not increase the current or future risk of flooding to surrounding land, especially within St Fittick’s Park. Surface water management must be incorporated including sustainable flood risk management (SuDS) and appropriate blue-green infrastructures.
- Retain current outfall to Nigg Bay for re-aligned section of the East Tullos Burn.
- Ensure operational access is maintained from Gregness to essential port infrastructure (breakwater / sector light).

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: R6 (Low and Zero-Carbon Buildings), R7 (Renewable and Low Carbon Energy Developments), R8 (Heat Networks), NE4 (Our Water Environment).
- ACC Supplementary Guidance: Flooding, Drainage & Water Quality, Resources for New Development.



Opportunities to enhance access to St Fittick’s Park and wetlands, and integrate new or existing active travel routes should form part of development.



Development should ensure wayleaves and stand-off zones to the WWTW and associated infrastructure are agreed with Scottish Water.

Landscape & Environment



Development within the Marine Gateway will result in some impacts to the local environment, and the loss of some existing greenspace within St Fittick’s Park. Development should be designed and delivered in accordance with the environmental mitigation hierarchy to reduce these impacts as far as possible, integrate effectively with environmental projects in the Community & Energy Coast Programme, and contribute to the overall net gain of biodiversity across the masterplan area. The principles of environmental mitigation that all development within the Marine Gateway should follow are scheduled overleaf.

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: NE1 (Green Belt), NE2 (Green & Blue Infrastructure), NE3 (Our Natural Heritage), NE4 (Our Water Environment), NE5 (Trees & Woodland), WB1 (Healthy Developments), WB2 (Air Quality), WB3 (Noise), D6 (Historic Environment).
- ACC Supplementary Guidance: Landscape, Natural Heritage, Trees & Woodlands, Green Space Network and Open Space, Air Quality, Noise.



There are opportunities to enhance water quality within East Tullos Burn and manage for improved biodiversity.



Development should be integrated with Aberdeen South Harbour and provide high-value activity that is a catalyst to further investment across ETZ.

| St Fittick's Park (OP56 / OP62) | PREVENTIVE MEASURES | | REMEDIATIVE MEASURES | |
|---|--|---|---|--|
| Development providing for potential re-alignment of Coast Road and creation of platforms for high-value manufacturing and port-integrated activity. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| East Tullis Burn & Wetlands Development within OP56 has the potential for direct impacts on the hydrology and ecology of the East Tullis Burn, and associated wetland habitats within the park. | <ul style="list-style-type: none"> Complete survey/mapping of East Tullis Burn to protect hydrology and wetland system. Reduced development footprint – compared to 21ha OP56/OP62 combined allocation. Retention of East Tullis Burn as key design principle informing configuration of development plots. | <ul style="list-style-type: none"> Provide minimum 40m buffer zones to East Tullis Burn to ensure separation from development and minimise impact on setting and ecology. Retain Nigg Bay outfall as per current arrangements. Avoid culverts or enclosed sections other than for road/pedestrian footway-cycleway crossings. Ensure all development sites have full SuDS measures to treat/attenuate flows before discharge. | <ul style="list-style-type: none"> Upgrade Burn Management (East Tullis) to extend annual management programme and retain open water/ de-silting works. Typha management programme to manage overgrown species and associated local native re-stocking. Burn/Park Access Improvements – linked to greenspace mitigation, improve blue-green network with access points to water/burn margins. | <ul style="list-style-type: none"> East Tullis Burn 2.0 Project to re-align and extend the channel (northern section) ensuring meandering of watercourse. Water Quality Enhancement through management and treatment of surface water from East Tullis Industrial Estate. Wetland Habitat Enhancement including landscape management and potential provision of additional wetlands to support treatment of surface water discharges. East Tullis Boardwalk – for closer integration / access to blue-green network and contact with nature. |
| Trees & Woodland Development within St Fittick's Park will result in the direct loss of trees and mature woodland habitats– principally in the area surrounding the existing WWTW. | <ul style="list-style-type: none"> Reduced development footprint - compared to 21ha OP56/OP62 combined allocation. Retain woodland belt along railway line and elsewhere in St Fittick's Park. | <ul style="list-style-type: none"> Minimise losses to woodland wherever possible and safeguard boundary trees through CEMP. Provide buffer zones to site perimeters (WWTW / Park) with retained woodland planting. | <ul style="list-style-type: none"> New Native Woodland Planting to replace trees removed through development and ensure overall net gain in tree cover (subject to further survey and Landscape Framework) Native Amenity Trees & Hedgerows to be incorporated into site/plot landscape scheme. | <ul style="list-style-type: none"> Compensatory Tree Planting additional planting across masterplan area to ensure overall net gain in tree cover and address woodland fragmentation – Tullis Wood and as potential priority planting area (subject to further survey and Landscape Framework) |

| St Fittick's Park (OP56 / OP62) | PREVENTIVE MEASURES | | REMEDIATIVE MEASURES | |
|--|--|--|--|---|
| Development providing for potential re-alignment of Coast Road and creation of platforms for high-value manufacturing and port-integrated activity. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Biodiversity Protection & Enhancement Ensure existing biodiversity is protected and enhanced by completing full habitat mapping and developing an ecological based response plan to address long-term enhancement of natural capital and biodiversity. | <ul style="list-style-type: none"> Complete detailed habitat mapping of core sites within the Marine Gateway Identify areas that contribute to local biodiversity and target / priority species. Integrate environmental / ecological mapping into early planning and design development. | <ul style="list-style-type: none"> Identify and minimise direct impacts on areas of biodiversity value. Minimise losses to habitats wherever possible and build ecological / habitat protection into CEMP. | <ul style="list-style-type: none"> Habitat Management - identify areas within the site for biodiversity enhancement through new planting / landscaping or enhanced ecological management. Park & Wider Managed Grasslands (see Pollinator Coast) | <ul style="list-style-type: none"> 'Pollinator Coast' - programme creating new habitat / biodiversity opportunities (invertebrates) along coastal corridor. Habitat Connectivity - Enhance existing habitats / natural capital to address habitat fragmentation and link Green Network elements. Green Roofs- incorporated where feasible as part of Plot Landscape Frameworks. |
| Heritage (St Fittick's Churchyard) Development is proposed in close proximity to St Fittick's Churchyard (Scheduled Monument) with potential for impacts on its setting. | <ul style="list-style-type: none"> Reduced development footprint - compared to 21ha OP56/OP62 combined allocation. Potential road re-alignment sited within OP62 boundary to maximise separation from churchyard (reducing PoA development area). | <ul style="list-style-type: none"> Provide minimum 40m buffer zones to St Fittick's Churchyard from development and/or re-aligned road to ensure separation from development and minimise impact on setting. | <ul style="list-style-type: none"> Boundary Treatment to church and boundary areas incorporating combination low-level planting, living walls, and landscape features. Detailed measures to be agreed in consultation with ACC and HES - reflect changed landscape context surrounding the Church, and ensuring impact on setting of the Scheduled Monument are minimised and appropriately mitigated. | <ul style="list-style-type: none"> Provision of new / replacement Interpretative Signage at site to ensure the story of Church and its position within local history positively contributes to amenity within the Park. Enhancing status of the Church as key asset for St Fittick's Park, in prominent location at a 'gateway' to Aberdeen, potentially through sensitive up-lighting specialist stonework / fabric repairs (to be developed in consultation with ACC Archaeology / HES). |

| St Fittick's Park (OP56 / OP62) | PREVENTIVE MEASURES | | REMIADIATIVE MEASURES | |
|---|--|--|--|---|
| Development providing for potential re-alignment of Coast Road and creation of platforms for high-value manufacturing and port-integrated activity. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Park, Greenspace & Green Networks Development within OP56 and OP62 will involve the loss of some local greenspace and functions / features of the existing public park. | <ul style="list-style-type: none"> Reduced development footprint – compared to 21ha OP56/OP62 combined allocation. Avoid greenspace adjacent to housing/ core park areas and main access points to park. | <ul style="list-style-type: none"> Retain most valuable / significant park features – East Tullos Burn + Wetlands, play facilities, Core Paths. Provide buffer zones to site perimeters (WWTW / Park) with retained woodland planting. | <ul style="list-style-type: none"> Path Realignments / Improvements - to enhance quality and accessibility of St Fittick's Park – including potential boardwalk and integrated with biodiversity and landscape management works. Park Enhancements to mitigate loss of quantity of greenspace with improvements to quality and accessibility. Extending use, improving access, and provision of additional facilities (e.g. skate park / pump track/ play/ community growing - to be agreed with local community). | <ul style="list-style-type: none"> Local Parklets enhancing park and local greenspace facilities immediately adjacent to housing. Extending access (Older People /young People / Carers / etc), 'offsetting' loss of greenspace and adding to local amenity. 'Energy Coast' Coastal Path upgrade to improve local Green Network quality and accessibility for all communities and support local health & well-being. Tullos Wood Gateway – enhancing accessibility to local Green Network from Torry. |

| St Fittick's Park (OP56 / OP62) | PREVENTIVE MEASURES | | REMIADIATIVE MEASURES | |
|---|---|--|---|---|
| Development providing for potential re-alignment of Coast Road and creation of platforms for high-value manufacturing and port-integrated activity. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Local Amenity Development will involve industrial / commercial activity in relative proximity to existing sensitive receptors with the potential for impacts on local amenity – especially in terms of noise and visual impact. | <ul style="list-style-type: none"> Reduced development footprint - compared to 21ha OP56/OP62 combined allocation. Ensure a clear stand-off between development areas and residential properties. | <ul style="list-style-type: none"> Development within OP56 site to be primarily 'built development' with limited external operations. Planning conditions to define parameters for height & massing reflecting standard industrial typologies and based on Landscape & Visual Impact Assessment. Planning conditions to provide operational controls on hours of use / outdoor activity. - Planning conditions to provide operational controls on hours of use / outdoor activity – based on Noise Impact Assessment. Noise control measures for construction period (including controlled working hours) to be agreed through CEMP / Noise Impact Assessment. | <ul style="list-style-type: none"> Plot Landscape Frameworks for all sites addressing detailed layouts to protect amenity, incorporate screening and boundary treatments (living walls, shelterbelt, other landscape measures) to mitigate visual impact of built development and associated external areas. Landscape Planting & Boundary Treatments within park / buffer zones to provide partial screening to built development. | <ul style="list-style-type: none"> Architectural/ Design Treatments Architectural and design measures associated with building detailing and combination of site planning / plot development, landscape treatments appropriate to the nature of future development and amenity needs. |

| Gregness (OP62) | PREVENTIVE MEASURES | | REMEDIATIVE MEASURES | |
|--|---|--|--|--|
| Development providing platform suitable for manufacturing associated with ASH, and areas suitable for external storage and other energy transition uses. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Biodiversity Protection & Enhancement Ensure existing biodiversity is protected and enhanced by completing full habitat mapping and developing an ecological based response plan to address long-term enhancement of natural capital and biodiversity. | <ul style="list-style-type: none"> Complete detailed habitat mapping of core sites within the Marine Gateway. Identify areas that contribute to local biodiversity and target / priority species. Integrate environmental / ecological mapping into early planning and design development. | <ul style="list-style-type: none"> Identify and minimise direct impacts on areas of biodiversity value. Minimise losses to habitats wherever possible and build ecological / habitat protection into CEMP. | <ul style="list-style-type: none"> Habitat Management - identify areas within the site for biodiversity enhancement through new planting / landscaping or enhanced ecological management. Native Amenity Trees & Hedgerows to be incorporated into Plot Landscape Framework. | <ul style="list-style-type: none"> 'Pollinator Coast' - programme creating new habitat / biodiversity opportunities (invertebrates) along coastal corridor. Habitat Connectivity - Enhance existing habitats / natural capital to address habitat fragmentation and link Green Network elements. Green Roof Developments - incorporated where feasible as part of Plot Landscape Frameworks. |

| Gregness (OP62) | PREVENTIVE MEASURES | | REMEDIATIVE MEASURES | |
|--|---|---|--|--|
| Development providing platform suitable for manufacturing associated with ASH, and areas suitable for external storage and other energy transition uses. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Park, Greenspace & Green Networks Development at Gregness (OP62) may impact on accessibility to the local Green Network. | <ul style="list-style-type: none"> Reduced development footprint to core areas of site – ensuring that Coastal Path can be retained and re-instated (as required by conditions linked to Aberdeen South Harbour construction). | <ul style="list-style-type: none"> Provide buffer zones to site perimeters – Coastal Path and clifftop so that these remain fully accessible and provide amenity value as part of the Green Network. | | <ul style="list-style-type: none"> 'Energy Coast' Coastal Path upgrade to improve local Green Network quality and accessibility for all communities and support local health & well-being. |
| Local Amenity Development will involve industrial / commercial development on an exposed coastal site, with the potential for impacts on local amenity – especially in terms of visual impact. | <ul style="list-style-type: none"> Reduced development footprint – situating primary built development to the north of the site closest to ASH and within parts of the site previously developed (Concrete Batching facility). | <ul style="list-style-type: none"> Planning conditions to define parameters for height & massing reflecting industrial typologies and based on detailed Landscape & Visual Impact Assessment. Planning conditions to provide operational controls on hours of use / outdoor activity. | <ul style="list-style-type: none"> Path Network Connections - (See Green Networks above). Plot Landscape Frameworks - addressing detailed layouts to protect amenity and provide landscape features appropriate to coastal character, to mitigate visual impact of built development and associated external areas. Landscape Planting & Boundary Treatments within buffer and boundary zones to provide partial screening to built development (species and character of planting appropriate to Coastal strip) | <ul style="list-style-type: none"> Architectural/ Design Treatments Architectural and design measures associated with building detailing and combination of site planning / plot development, landscape treatments appropriate to the nature of future development and amenity needs that positively complement the industrial / infrastructure setting around Aberdeen South Harbour. |



KEY MASTERPLAN CONSTRAINTS, OPPORTUNITIES & CONSIDERATIONS.

While the Harbour and OP56 and OP62 Opportunity Sites represent a major economic and energy transition development opportunity, existing land uses, site infrastructure, and blue-green network assets provide constraint, and a balance is required between development and protecting both greenspace and biodiversity assets.

Development within the Marine Gateway therefore requires coordinated planning that appropriately addresses opportunity and constraint to achieve sustainable development. This means incorporating measures to avoid and minimise environmental impacts such as landscape buffers, as well mitigation and compensatory provision including investment in local biodiversity, amenity, and retaining and improving accessibility to greenspace.

- 1 **East Tullos Burn** – improved and ‘re-meandered’ in 2014 through SEPA / ACC Community Partnership. Important hydrological and ecological function and key asset for St Fittick’s Park. Approximate route illustrated diagrammatically here.
- 2 **Wetland habitats** providing locally important biodiversity – in places overgrown by non-native species (Typha) closing out open water and hampering function of the Burn.
- 3 **East Tullos Burn outfall to Nigg Bay** (beneath Coast Road).
- 4 **Railway footpath** crossing to be closed by Network Rail
- 5 **Nigg Bay SSSI** – designated for its quaternary geology and geomorphology
- 6 **Existing residential communities** in Torry & Balnagask – in close proximity to allocated Opportunity Sites within St Fittick’s Park.
- 7 **Valued local greenspace** and community park – providing space for leisure and recreation.
- 8 **Existing Woodland** – screening Waste Water Treatment Works.
- 9 **St Fittick’s Church** (Scheduled Monument).
- 10 **Coast Road**
- 11 **Nigg Bay Waste Water Treatment Works** – major water treatment facility for Aberdeen and wider region, including sub-terrain rising mains and combined sewer overflows situated within the Park.
- 12 **Local Path Network** – including Core Path 78 which connects to Cove via the coastal cliff-top path and Core Path 108 crossing St Fittick’s Park.
- 13 **Footpath** to be provided as part of re-aligned Greyhope Road, associated with Aberdeen South Harbour construction.
- 14 **Tullos Wood** – a Local Nature Conservation Site with excellent views over the City and a number of Scheduled Monuments, but challenging to access from Torry.
- 15 **Aberdeen South Harbour** - £400m investment in deep-water marine infrastructure capable of serving offshore renewables sectors and catalysing investment.
- 16 **Co-located LDP Opportunity Site (OP56)** – designated for energy transition uses which have a functional association with Aberdeen South Harbour.



Railway Crossing (to be closed)



East Tullos Burn Outfall



Local Greenspace



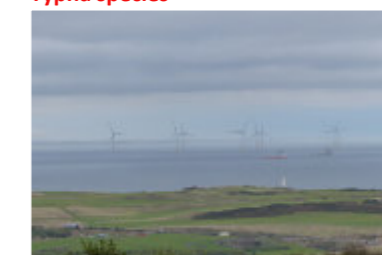
Local Path Network



Wetland Habitats include overgrown Typha species



Tullos Wood



Aberdeen Bay Windfarm



St Fittick’s Park

Illustrative Plan Key Masterplan Considerations



STRATEGIC MITIGATIONS & COMPENSATIONS

As set out within the 'Community & Energy Coast', the Masterplan identifies a range of mitigation and compensatory measures including specific proposals within and around St Fittick's Park to address the impacts of development on greenspace, local landscape and biodiversity, East Tullos Burn, cultural heritage, and local connectivity. These respond to specific requirements set out within the Local Development Plan (OP56 Allocation) and NPF4, as well as incorporating wider measures to ensure a sustainable development that positively contributes to local place-making.

Locations shown are indicative and the precise nature of mitigations and compensations will be informed through further detailed environmental and technical assessment (including EIA), as well as consultation and engagement with key stakeholders including ACC and local community. The full detail of proposed mitigation and compensation measures set out will be developed and secured through future planning processes, recognising that additional site specific mitigation and compensation may also be required as an outcome of EIA / Transport Assessment and other technical studies.

**Illustrative Plan
Strategic Mitigations & Compensations**

- 1 **Local Parklets** – providing enhanced park and local greenspace facilities within currently under-utilised open space in close proximity to housing – extending access and adding to local amenity. Specific locations and amenities within Parklets to be confirmed through further consultation and in coordination with ACC and the relevant community interest groups.
- 2 **Heritage Interpretation and Restoration** – boundary treatment and landscaping to reflect changed setting of St Fittick's Church, along with provision of replacement interpretation signage and sensitive conservation repair (to be developed in consultation with HES / ACC Archaeology)
- 3 **Path Network** - Core Path and other walking routes through St Fittick's Park to be re-instated and enhanced to maintain connectivity through the area and ensure full accessibility across the Green Network.
- 4 **Boardwalk and Wetland access** – to allow closer integration, access, and contact with nature within St Fittick's Park and wetlands.
- 5 **Pollinator Coast Biodiversity** – strengthening habitat connectivity and biodiversity within the Coastal corridor through targeted pollinator planting – complementing ACC B-Line initiative with coastal plant species to support priority invertebrates.
- 6 **Tullos Wood Access & Path Connections** – to enhance accessibility to Tullos Wood and the wider Green Network from Torry – providing more accessible, legible and direct entrance along with associated pathway and landscaping improvements.
- 7 **Retained East Tullos Burn** – key ecological and hydrological asset retained and separated from proposed development sites through landscape buffer zones.
- 8 **Burn Re-Alignment** - Partial re-alignment and extension of eastern section of the channel to enable formation of development plots – replicating the 'meandering' course of the current section.
- 9 **Native Species Planting and Wetlands Habitat Management** – targeted management of overgrown species (Typha) to improve areas of open water and functional hydrology, and associated re-stocking of native species around the Burn with wetland landscape to be managed for biodiversity.
- 10 **East Tullos Drainage Infrastructure** – management and pre-treatment of surface water run-off from East Tullos Industrial Estate to support water quality improvement within the Burn.
- 11 **Energy Coast 'Coastal Path'** – maintained Coastal Path (Core Path 78) incorporating pathway provisions arising from Aberdeen South Harbour construction, and tied in to planned Coast Road re-alignment with opportunity for interpretation around Nigg Bay SSSI.
- 12 **Plot Landscape Framework** – incorporating a range of measures within the Development to support biodiversity and habitat connectivity – including landscape planting to support amenity and integrate with surrounding Green Network as well as potential green roofs and living walls, adding to the 'Pollinator Coast'.
- 13 **Skate Park / BMX Pump Track** – potential extension and enhancement of Skate Park facility and/or BMX Pump Track to add to facilities within the Park – to be agreed with local community and Locality Planning Partnership, and advanced through co-design.
- 14 **Play Facilities** – potential extension or enhancement of existing play provision within St Fittick's to add to the overall quality of the Park, particularly around facilities for explorative or innovative play.
- 15 **Compensatory Tree Planting** – development in St Fittick's Park will result in the loss of trees and mature woodland, to be replaced and compensated across the masterplan area.



Path Network



Heritage Interpretation & Restoration



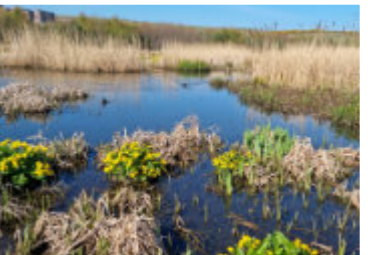
Pollinator Cost Biodiversity



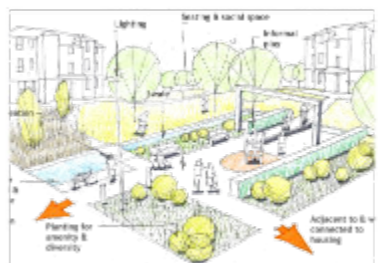
Skate Park



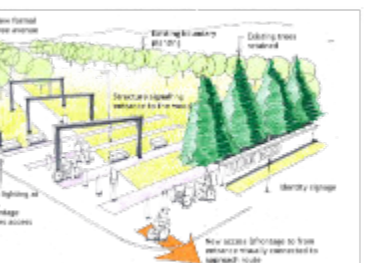
Boardwalk and Wetland Access



Enhanced Wetland Habitat



Local Parklets



Tullos Wood Access & Paths



INDICATIVE MASTERPLAN - ST FITTICK'S

The layout and design principles are captured within the illustrative campus layouts for the Marine Gateway. Developable areas shown are indicative and will be defined through further assessment and review but must reflect design guidance and address site constraints and opportunities on a reduced development area within the allocated Opportunity Site boundaries, along with issues and points raised during engagement with partners, stakeholders and the local community.

St Fittick's

- 1 Buffer zones to setting of St Fittick's Church for landscaping and screening treatment – with detailed consideration of levels and final road alignment. Detail to be agreed with HES and ACC Archaeology.
- 2 Buffer zones to retained East Tullos Burn incorporating native planting and landscaping – separating development from key wetland environments as far as possible.
- 3 Potential coast road re-alignment incorporating full active travel provision. Enabling creation of development plot contiguous with Aberdeen South Harbour. Detailed design to be agreed with ACC Roads.
- 4 Port integrated activity contiguous with Aberdeen South Harbour and with direct access to quayside.
- 5 High-value energy transition activity, such as manufacturing, with functional association to Aberdeen South Harbour which precludes it being located elsewhere. High-quality design incorporating durable materials, with height and massing informed by landscape & visual impact assessment.
- 6 Primary site access from re-aligned Coast Road – crossing the re-aligned section of the East Tullos Burn. Potential managed crossing of Coast Road for inter-connectivity with Aberdeen South Harbour dependent on end-user requirement.
- 7 SuDS provision (shown indicatively) to be incorporated into development plots – ensuring development is flood resilient and does not increase current or future risk of flooding to surrounding land, especially within St Fittick's Park.

○ Strategic Mitigations & Compensations – shown overleaf.



Aberdeen South Harbour



Jack-up Vessel



High Value Manufacturing

**Illustrative Concept
High Value Energy Transition Manufacturing Co-located with Port**



INDICATIVE MASTERPLAN - GREGNESS

The layout and design principles are captured within the illustrative campus layouts for the Marine Gateway. These reflect design guidance and address site constraints and opportunities along with issues and points raised during engagement with partners, stakeholders and the local community.

Development Proposals:

- 1 Principal site access from Coast Road – utilising existing site entrance.
- 2 High-value manufacturing activity – benefitting from immediate proximity and ability to transport materials downhill over a very short distance. Building footprint to be configured around Scottish Water sub-terrain infrastructure
- 3 Access to Aberdeen South Harbour breakwater and sector light maintained through development.
- 4 Development plot at the south of the site – configured around Scottish Water sub-terrain infrastructure and suitable for complementary, smaller-scale energy transition activity that may benefit from coastal location and/or proximity to the Harbour.
- 5 Planned coast road re-alignment including new rail crossing. All future development to be closely coordinated with ACC Roads, noting potential for associated land and/or phasing requirements to enable construction.

Strategic Mitigations & Compensations:

- 6 Landscape screening and treatment within buffer and boundary zones, incorporating native species suitable for coastal cliff-top environment and adding to site biodiversity.
- 7 Coastal path (Core Path 78) to be retained / re-instated (requirement of Aberdeen South Harbour planning consent) and form part of 'Energy Coast' with enhanced interpretation and wayfinding, including around Nigg Bay SSSI.
- 8 Native species amenity landscaping and planting around site boundaries within coastal corridor, to add to 'Pollinator Coast' and overall site biodiversity.
- 9 Building height and massing to be determined through Landscape & Visual Impact assessment, accounting for potential local landscape sensitivity as well as changing setting and character as a result of new marine infrastructure around Aberdeen South Harbour.



Gregness



Aberdeen South Harbour



Development must ensure access and functionality of Harbour infrastructure is maintained.



Hydrogen Campus

4.3 HYDROGEN CAMPUS

The production and distribution of low-carbon hydrogen, especially green hydrogen, will be a key part of Scotland’s future net zero economy. Hydrogen can be stored, liquified and transported via road / rail / sea / pipelines and has wide-ranging applications as a zero-carbon energy source especially in industry and transport.

Aberdeen has been an early adopter of hydrogen – and North East Scotland has the potential to produce >20% of Scotland’s low carbon hydrogen production target by 2030. A series of hydrogen production projects are being progressed within the ETZ area, including BP Aberdeen Hydrogen Energy Ltd.’s Aberdeen Hydrogen Hub, Vattenfall’s HT-1 project and ERM’s Dolphyn project.

The ETZ masterplan is seeking to further strengthen the City’s position as a centre for innovation and excellence in this specialist and growing sector. Doonies (OP61) is identified as a suitable and well-positioned site for a purpose-developed technology campus, providing new development and infrastructure to address challenges associated with hydrogen production, storage and distribution, and growing the hydrogen supply-chain and industrial / manufacturing base. Development of the site will seek to provide a multi-use cluster of industry operators, researchers and innovators, and institutional partners active in the emerging hydrogen sector.

Development Vision

Developed as a specialist Energy Transition campus anchored around a Green Hydrogen Test and Demonstration Facility (GHTDF) the campus will reinforce Aberdeen’s position as the leading centre in green hydrogen technology, production and application. Commercial partner investment will drive additional applications and form a key part of the emerging Scottish hydrogen technology ecosystem. The Hydrogen Campus will additionally attract green hydrogen high-value manufacturing opportunities, such as electrolyser manufacturing, and support supply chain companies exploiting green hydrogen production potential associated with ScotWind, INTOG and onshore wind developments.

Hydrogen Campus – Planning & Policy Overview

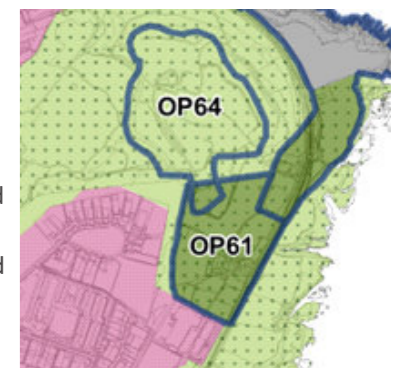
The Hydrogen Campus incorporates land at Doonies, situated on the west side of the Coast Road at the edge of Altens Industrial Estate. Land within Altens Industrial Estate (Peterseat Drive) also has the potential to support future expansion of the Campus and is designated as Business & Employment Land. The Doonies site is designated as Opportunity Site OP61 (Doonies) within the LDP, as well as being covered by Policy B5 relating to the Energy Transition Zone.

The OP61 Opportunity Site allocation includes areas of the former Ness Landfill to the north of the farm, overlapping slightly with the OP64 Opportunity Site which relates to development of a Solar Farm linked to the bp Aberdeen Hydrogen Energy Ltd. “Hydrogen Hub”.

| POLICY | Summary Extract |
|------------------|--|
| OP61 | <i>“This area along with OP56 will support renewable energy transition related industries in association with Aberdeen South Harbour...Other issues which need to be addressed include landscape impact of development, recreational access and habitat connectivity.”</i> |
| Policy B5 | <i>“There will be a presumption in favour of the development, production, assembly, storage and/or distribution of infrastructure required to support renewable energy related industries; this includes offshore wind, tidal, hydrogen and solar...Development proposals will be required to include suitable open space and landscape enhancements for the wellbeing of people and wildlife”</i> |

The LDP requires for Opportunity Sites OP56, OP61 and OP62 that masterplanning specifically considers the following matters:

- The extent of developable areas within B5 Energy Transition Zone zoning.
- Areas which should remain undeveloped and the extent of any buffer zones.
- Mitigation measures to ensure the continued viability of linear habitats including the East Tullos Burn, recreation and Core Path network.
- Options for the use of the waste-water treatment plant.
- Measures to avoid, minimise, mitigate, and compensate potential impacts on biodiversity and greenspace that will ensure at least no net loss of biodiversity across the masterplan area.



Local Development Plan (LDP)



**Illustrative Concept
Hydrogen Campus incorporating Manufacturing, R&D, Demonstrator and Support Services**

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Site Opportunities & Constraints

The Doonies site is currently greenfield and has been in use as a rare breeds farm, though the lease on the farm is due to end subject to agreement with ACC. The site is not subject to any environmental or cultural heritage designations and is relatively unconstrained for development. It offers strong potential for creation of a specialist technology campus with a mix of plot sizes suitable for different users.

The site has a direct access from the Coast Road and is sited directly opposite a single-track railway crossing linking to National Cycle Route 1 and the Coastal Path. There is an opportunity for creation of enhanced access to the site, delivered in coordination with the planned upgrade of the Coast Road (Aberdeen Harbour External Transportation Links) which will strengthen its connection to the South Harbour. In particular, masterplanning has identified an opportunity for creation of a new road link across the site, connecting the Coast Road directly to Peterseat Drive. This would deliver access to plots within the Campus and integrate the site closely with Altens Industrial Estate creating further opportunity for brownfield land renewal on vacant and under-utilised sites for future growth of the Campus.

The site is well removed from sensitive receptors and close to the shoreline providing an opportunity for connection to offshore renewables, including pipeline supply of green hydrogen produced offshore which is already being actively explored (see 'Investment & Development Proposition' below).

The former Ness Landfill sits immediately to the north of the site. Ground conditions and the potential for associated contamination would require thorough assessment as part of any development. At the northern boundary (between the landfill and the site) a narrow pathway provides access to/from Tullos Wood and the Coast, which should be integrated into development with opportunities for enhancement considered.

The site sits at the interface between the heavily industrial character of Altens (to the south and west) and the undeveloped, open coastal landscape (to the north and east), requiring careful design consideration to positively integrate development and provide a strong landscape quality.

| Opportunities | Constraints |
|---|---|
| <ul style="list-style-type: none"> Specialist Campus to support / catalyse Hydrogen technologies. Creation of new Link Road connecting Peterseat Drive to Coast Road. Connection / expansion to future brownfield land renewal (Peterseat). Create strong landscape amenity. Strengthen active travel links and support Coast Road infrastructure. | <ul style="list-style-type: none"> Site availability limited by current lease termination date. Adjacency of former Ness Landfill Site. Coastal landscape character. |



**Illustrative Concept
Green Hydrogen Test & Demonstration Facility**

Investment & Development Proposition

The Hydrogen Campus is a location of active investment interest. Development interests are seeking a range of facilities that will include a mix of building typologies (Office and R&D (Class 4), Manufacturing (Class 5), Distribution (Class 6) suitable for research & innovation, advanced manufacturing, and production-based activities for hydrogen and its linked supply-chain. This includes:

| Hydrogen Investment | Masterplan Requirements |
|---|--|
| Green Hydrogen Test and Demonstration Facilities (GHTDF) | R&D Facility utilising hydrogen from ERM’s Dolphyn project to demonstrate and test hydrogen (meters, valves, compressors etc) and equipment provide an innovation and technology test centre for new and emerging suppliers and service companies. |
| Enabled Sites for strategic green hydrogen production projects | Enabled land for strategic green hydrogen projects, such as the ERM Dolphyn project’s onshore facilities. |
| Manufacturing Facilities | Manufacturing associated with large / industrial scale hydrogen electrolyzers (and associated components) through to manufacture of hydrogen refuelling and battery cell technologies. |
| Large Scale Manufacturing | |
| Manufacturing Facilities | Cross-cutting innovation and academic and industry partnership will be required in the creation of Scotland's hydrogen economy. R&D and proof of concept / incubator and commercial workshop space for early-stage hydrogen companies. |
| Proof of Concept / Incubator | |
| Manufacturing Service & Support Technology Providers | Specialist sector leading companies associated with hydrogen and fuel cell technology, PEM fuel cell management, liquid/molecular hydrogen distribution systems and management. |

The Hydrogen Campus will seek to offer a range of buildings suitable for innovation, research & development, start-up businesses, and institutions operating in the hydrogen sector such as ORE Catapult, EMEC, and Net Zero Technology Centre. Subject to future planning and development arrangements these may include co-working space, flexibly let offices, technology labs, technology demonstration facilities, and shared amenities, that together facilitate a high-quality environment for research, innovation and commercialisation.



The scale of site also offer potential for larger-scale industrial units suitable for high-value manufacturing and wider supply-chain activity, supporting the development of technologies and processes involved in hydrogen production, storage and distribution. These could include large scale specialist manufacturing of electrolyzers required to produce hydrogen, or production of hydrogen fuel cells used in low carbon transport and industrial processes.


As noted above, the site’s coastal location provides opportunity for onshore landing of offshore green hydrogen production. ERM Dolphyn is in advanced discussions to make landfall of their offshore green hydrogen production project at a site within the Hydrogen Campus, providing a ready supply of green hydrogen to the site for research, test & demonstration purposes, and for onward distribution to power the city of Aberdeen’s rapidly growing hydrogen sector. The Campus could be suitable as a landfall location for other offshore green hydrogen production, subject to future development and feasibility.

The emergence of new markets and supply-chains within the hydrogen sector will provide diversification opportunities for local companies that have previously serviced oil & gas sectors. The Campus will seek to provide a focus for leveraging and re-purposing the region’s expertise in these areas to create new economic value and jobs.

Development Guidance

Development within the Hydrogen Campus will promote a cluster supporting a regional Centre of Excellence that builds on the early adoption of hydrogen technologies by Aberdeen City Council and the opportunities for green hydrogen production associated with ScotWind, INTOG and the significant planned expansion of the onshore wind sector in Scotland.

| | |
|---|---|
| <p>Land Use</p>  | <p>The Hydrogen Campus is proposed to be developed on a site currently in agricultural use operating as Doonies Farm, with future expansion potential on brownfield land at Peterseat Drive.</p> <p>Development within the Campus should principally comprise a mix of Class 4 / 5 with ancillary Class 6 uses. It should provide facilities suitable for a range of users in the energy transition and hydrogen sector, including research, test & demonstration / commercialisation of hydrogen technologies, and high-value manufacturing associated with production, storage, distribution, and use of hydrogen. A small portion of the on-site infrastructure may be Sui-Generis use class, reflecting its highly specific nature, and should be considered on its merits and with regard to their suitability within an energy transition and industrial cluster.</p> <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> • Local Development Plan Policies: B5 (Energy Transition Zone). • National Planning Framework 4 – National Development 14. |
| <p>Design Quality</p>  | <p>Development within the Hydrogen Campus should:</p> <ul style="list-style-type: none"> • Develop a coherent and structured Campus layout facilitating development of strategic green hydrogen projects, with development plots sited around the alignment of a Peterseat-Doonies Link Road. • Incorporate landscape and amenity features to provide the qualities of a Campus site. Higher amenity and design quality buildings should be located towards the Coast Road frontage and taking advantage of prominent / principal views offered by the site. • Provide building heights reflecting standard industrial typologies, typically in the range of 10-15m (eaves height) subject to land uses and specific end-user requirements. Further design development should be informed by detailed review of landscape & visual impacts to inform plot specific approach to height, massing and building form – taking account of scale/massing of adjacent sites and surrounding landform. • Provide for sustainable development that minimises resource use and total energy demand through passive and active measures, and where feasible integrate renewable energy technologies within development. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> • Local Development Plan Policies D1 (Quality Placemaking), D2 (Amenity), D3 (Big Buildings), D4 (Landscape), D5 (Landscape Design), D6 (Historic Environment), R6 (Low and Zero Carbon Buildings). • ACC Supplementary Guidance: Big Buildings, Landscape, Resources for New Development. |

| | |
|---|---|
| <p>Transport & Connectivity</p>  | <p>Development within the Hydrogen Campus should:</p> <ul style="list-style-type: none"> • Create safe and attractive routes for walking and cycling across the area - ensuring active travel routes link to employment sites and make connections to wider Core Path and leisure path networks. • Ensure connectivity from the site to the Tullos Hill path network and support the creation of new routes through the site connecting to the Coast and NCR1. • Provide direct access via a priority junction from the upgraded Coast Road, with specific siting and design requirements to be agreed in consultation with ACC Roads & Highways. Proposals should be coordinated with planned ACC enhancements work (including road widening) to the Coast Road, noting potential for associated land requirements within the OP61 site. • Incorporate a new link road crossing the site, to service development plots within the Campus and connect the Coast Road directly to Peterseat Drive. The road should be suitable for heavy-load vehicle movements and incorporate full active travel provision (walking and cycling). • Support Active Travel integration with covered and secured cycle parking facilities, along with car parking in accordance with ACC Standards (including EV Charging to support low-carbon journeys). <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> • Local Development Plan Policies: T1 (Land for Transport), T2 (Sustainable Transport), T3 (Parking). • ACC Supplementary Guidance: Transport & Accessibility. <p>In addition to planning requirements, the detailed design of any road infrastructure within the Hydrogen Campus should have regard to relevant standards within the Design Manual for Roads & Bridges, National Roads Development Guide (SCOTS), and be developed in close consultation with ACC Roads officers.</p> |
|---|---|

Infrastructure



Development within the Hydrogen Campus should:

- Ensure that all development is designed to be flood resilient and does not increase the current or future risk of flooding to surrounding land. Surface water management must be incorporated including sustainable flood risk management (SuDS) and appropriate blue-green infrastructures. Where possible, development should seek to provide SuDS ponds to the Coast Road frontage of the site, reflecting site topography and complementing landscape planting.
- Give careful consideration to the adjacent Former Ness Landfill site and the potential for contaminated land, ensuring ground conditions suitability is fully considered and any remediation works are programmed.
- Consider regulatory requirements that may arise from on-site production and/or storage of hydrogen – potentially including COMAH / HSC / PPC licensing. Development involving hydrogen storage should be consulted at an early stage with the Health & Safety Executive, SEPA, and ACC to ensure risk management, health & safety, and operational processes are fully coordinated.
- Allow for ducting and wayleaves as appropriate to future-proof development connections to potential utility and renewable energy networks which may emerge within ETZ. (including for distribution of hydrogen).

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: R6 (Low and Zero-Carbon Buildings), R7 (Renewable and Low Carbon Energy Developments), R8 (Heat Networks), NE4 (Our Water Environment).
- ACC Supplementary Guidance: Flooding, Drainage & Water Quality, Resources for New Development.



Development of the Campus, including delivery of a new Link Road, should be closely coordinated with the planned upgrade of the Coast Road by ACC.

Landscape & Environment



Development of the Hydrogen Campus has the potential to result in impacts to the local environment. Development should be designed and delivered in accordance with the environmental mitigation hierarchy to reduce these impacts as far as possible integrate effectively with environmental projects in the Community & Energy Coast Programme and contribute to the overall net gain of biodiversity across the masterplan area. The principles of environmental mitigation that all development within the Hydrogen Campus should follow are scheduled overleaf.

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: NE1 (Green Belt), NE2 (Green & Blue Infrastructure), NE3 (Our Natural Heritage), NE4 (Our Water Environment), NE5 (Trees & Woodland), WB1 (Healthy Developments), WB2 (Air Quality), WB3 (Noise), D6 (Historic Environment)
- ACC Supplementary Guidance: Landscape, Natural Heritage, Trees & Woodlands, Green Space Network and Open Space, Air Quality, Noise.



Development should incorporate active travel routes connecting to the local Green Network, including the Coastal Path.



Brownfield land within Altens (Peterseat Drive) presents opportunity to integrate existing industrial sites and further expand the Campus

| Doonies (OP61) | PREVENTIVE MEASURES | | REMEDIATIVE MEASURES | |
|--|--|--|---|---|
| Development area providing for a Doonies-Peterseat Link Road and creation of development platforms for hydrogen test & demo, on-shore landing site, high-value manufacturing and supply-chain activity. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Biodiversity Protection & Enhancement Ensure existing biodiversity is protected and enhanced by completing full habitat mapping and developing an ecological based response plan to address long-term enhancement of natural capital and biodiversity. | <ul style="list-style-type: none"> Develop within defined OP61 boundaries – excluding areas of former landfill and associated drainage to reduce developable area. Complete detailed habitat mapping of the existing Doonies site. Integrate environmental / ecological mapping into early planning and design development. | <ul style="list-style-type: none"> Minimise losses to woodland and other habitats wherever possible and build ecological / habitat protection into CEMP. Provide buffer zones and separation to site perimeters (Landfill / Coast Road / SUEZ) with retained woodland planting where existing. Identify and minimise direct impacts on areas of biodiversity value. | <ul style="list-style-type: none"> Invasive Non-Native Species management programme to remove non-native invasive species on the site (Giant Hogweed) and associated local native species re-stocking. New Native Woodland Planting to ensure no net loss of woodland cover. Native Amenity Trees & Hedgerows to be incorporated into site/plot landscape scheme to support biodiversity. On-site SuDS infrastructure complementing landscaping and adding wetland biodiversity where possible. | <ul style="list-style-type: none"> Compensatory Tree Planting additional planting across masterplan area to extend woodland cover and address woodland fragmentation – Tullos Wood as potential priority planting area. ‘Pollinator Coast’ programme creating new habitat / biodiversity opportunities (invertebrates) along coastal corridor. Green Roofs- incorporated where feasible as part of Plot Landscape Frameworks. |

| Doonies (OP61) | PREVENTIVE MEASURES | | REMEDIATIVE MEASURES | |
|--|--|--|--|--|
| Development area providing for a Doonies-Peterseat Link Road and creation of development platforms for hydrogen test & demo, on-shore landing site, high-value manufacturing and supply-chain activity. | AVOID <i>Avoiding</i> impacts on biodiversity and local environment through site selection, retention of valuable assets, sensitive design development, and scheduling of works. | MINIMISE <i>Minimising</i> the significance / extent of impacts through controls and limits on the physical extent of development, and/or construction and operation of development. | MITIGATE <i>Mitigating</i> impacts where these occur through targeted environmental interventions -such as the on-site re-establishment of habitats, landscape management, or incorporating blue-green infrastructure into development. | COMPENSATE + ENHANCE <i>Compensating</i> for unavoidable environmental impacts through provision of new or enhanced environmental assets / features / habitats – with specific and direct relationship to residual project impacts. |
| Local Amenity Development will involve industrial / commercial development on an exposed coastal site, with the potential for impacts on local amenity – especially in terms of visual impact. | <ul style="list-style-type: none"> Site located away from sensitive receptors (residential, education, health) Develop within defined OP61 boundaries – excluding areas of former landfill and associated drainage to reduce developable area. | <ul style="list-style-type: none"> Campus primarily of ‘built development’ with limited external operations. Planning conditions to define parameters for height & massing reflecting standard industrial typologies and based on detailed Landscape & Visual Impact Assessment. Planning conditions to provide operational controls on hours of use / outdoor activity | <ul style="list-style-type: none"> Plot Landscape Frameworks for all sites addressing detailed layouts to protect amenity, incorporate screening and boundary treatments (living walls, shelterbelt, other landscape measures) to mitigate visual impact of built development and associated external areas. On-site Path Networks connecting to Tullos Wood to as part of Green Network – and connected to Peterseat-Doonies Link Road Active Travel provision. | Architectural / Design Treatments – Design measures associated with building detailing and combination of site planning / plot development, landscape treatments appropriate to nature of future development and amenity needs – creating a high-quality ‘Campus’ development. |



**Illustrative Concept
Hydrogen Campus incorporating Manufacturing, R&D, Demonstrator and Support Services**

INDICATIVE MASTERPLAN

The masterplan layout and design principles are captured within the campus layouts for the Hydrogen Campus. These reflect design guidance and address site constraints and opportunities along with issues and points raised during engagement with partners, stakeholders and the local community.

Development Proposals

- 1 Flexible development sites in a range of industrial and commercial typologies, suitable for manufacturing, R&D, and wider supply-chain.
- 2 Test & Demonstration facilities supporting innovation for hydrogen production, distribution, utilisation, and storage.
- 3 Brownfield land with Altens Industrial Estate suitable for potential future expansion of Campus, subject to future feasibility.
- 4 Primary site access from the Coast Road – with specific siting and design requirements to be coordinated and agreed with ACC Roads.
- 5 Provision of a new link road crossing the site and connecting the Coast Road to Peterseat Drive, suitable for heavy-load vehicle movements and incorporating active travel (walking and cycling) provision.

Strategic Mitigations & Compensations

- 6 Boundary treatments and landscape buffers incorporating native planting and trees to ensure no loss of woodland cover, and enhance local amenity and biodiversity
- 7 Plot Landscape Frameworks across the Campus incorporating planting and landscaping within development plots to mitigate the visual impact of development and add to site biodiversity – potentially including green roofs, living walls, and other landscape features.
- 8 On-site SuDS infrastructure integrated with landscaping and complementing overall site amenity, and adding to wetland biodiversity where possible.
- 9 Coastal Path (Core Path 78) forming part of 'Energy Coast' to be upgraded through targeted re-surfacing / re-instatement where pathways is degraded and with new interpretation and wayfinding – maintaining existing character as a coastal clifftop recreational walking route.
- 10 Retention and upgrade of on-site path networks connecting to Tullos Wood as part of the Green Network – integrated and connected to active travel provision within new Link Road.
- 11 Former landfill to be partially developed as Ness Solar Farm. Targeted native species planting as part of 'Pollinator Coast' to strengthen habitat connectivity and biodiversity within the Coastal corridor – complementing ACC B-Line initiative with species to support priority invertebrates.



**Illustrative Concept
Hydrogen Campus incorporating Manufacturing, R&D,
Demonstrator and Support Services**



4.4 OFFSHORE WIND CAMPUS

Complementing the Marine Gateway, the Offshore Wind Campus will provide a cluster of commercial, manufacturing, test & demonstration, and innovation facilities within brownfield land at Altens, supporting the growth of a strong offshore wind supply chain within the Zone, as well as providing opportunities for wider energy transition uses.

The key investment catalyst for the Campus is ETZ Ltd's co-investment with the Offshore Renewable Energy (ORE) Catapult to create a world leading National Floating Wind Innovation Centre (FLOWIC). The Centre is being developed to accelerate the commercialisation of floating offshore wind throughout the UK, capitalise on demand for floating offshore wind created by ScotWind, and support the incubation of new products, services and businesses within the sector.

Development Vision

Anchored by the National Floating Wind Innovation Centre (FLOWIC) the Offshore Wind Campus is a cluster supporting the development of offshore wind commercial applications, technologies and services, alongside complementary renewable energy activities. The Campus supports developers, operators, equipment manufacturers, supply chain companies and small innovators with research, test, deployment and validation facilities and small-medium scale business space. It will enable and support collaboration between academia, national innovation partners and industry creating a cluster of energy transition investment and activities.

Offshore Wind Campus – Planning & Policy Overview

The Offshore Wind Campus is situated on land at Hareness Road, on the eastern edge of Altens Industrial Estate. The site is designated as 'Business & Industry' land within the LDP. Immediately to the east of the site land around the Coast Road, East-Coast Main Line and on the coastal fringe is designated as Greenbelt and Greenspace Network.

The site contains the existing Irvin House building (now renamed W-Zero-1), a vacant mixed-use office, industrial and storage and distribution facility.

| POLICY | Summary Extract |
|---|--|
| Policy B1  | <p>"Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types.</p> <p>...</p> <p>New business and industrial land proposals shall make provision for areas of recreational and amenity open space, areas of strategic landscaping, areas of wildlife value and footpaths, in accordance with the Open Space Strategy and any approved non-statutory planning guidance, planning briefs or masterplans"</p> |



Local Development Plan (LDP)

Offshore Wind Campus



**Illustrative Concept
Floating Offshore Wind Innovation Centre within Existing Irvin House**

Site Opportunities & Constraints

The site is brownfield land with relatively few constraints to development across multiple plots for industrial use supporting energy transition. Boundaries to the site are well defined by Altens Industrial Estate to the west and north, woodland screening to the south, and the Coast Road and East-Coast Mainline to the east.

The presence of FLOWIC at the site along with renewal of existing buildings (such as ETZ Ltd’s W-Zero-2 Building on Minto Avenue) presents a clear opportunity for co-located activity around offshore wind and/or wider renewable energy supply chain, forming a cluster integrated with the existing industrial character in Altens.

Across the site there is potential to form access to multiple plots directly from Hareness Road. Opportunity exists for access to be enhanced through positive integration with the planned upgrade of this section of road through the Aberdeen Harbour External Transportation Links which will strengthen its connection to the South Harbour. The siting of junctions / access points will need to be sited carefully to ensure appropriate visibility and spacing given the curvature of Hareness Road and existing site entrances.

The site is relatively well removed from sensitive receptors, though residences at Burnbanks Village (approximately 220m from the southernmost plot) will require consideration of local amenity impacts.

The site slopes from west-to-east and further review of site topography and levels will inform more detailed proposals. British Geological Survey mapping indicates there is two areas of Made Ground at the western and southern edges of the site, which will also require further investigation as part of detailed planning.

Existing services at the site include Scottish Water infrastructure (sub-terrain foul sewers and surface water sewers) which cross east-west across the site. On the east side of Hareness Road are open drainage ditch and basins linked to surface water drainage from Altens Industrial Estate and Hareness Road.

| Opportunities | Constraints |
|--|---|
| <ul style="list-style-type: none"> • Redevelopment of Brownfield land. • Co-located business space & Innovation Centre (FLOWIC). • Co-located investment sites with Altens Industrial Estate. • Key corridor through Altens Industrial Estate to Coast Road. | <ul style="list-style-type: none"> • Ground conditions / made ground. • Existing local service and utility infrastructures. • Hareness Road curvature and siting of plot access. |



**Illustrative Concept
Floating Offshore Wind Innovation Centre within Existing Irvin House**

Investment & Development Proposition

The Offshore Wind Campus seeks to provide flexible business space for a mix of energy transition activity, (industrial / R&D / commercial) forming a multi-use campus alongside the FLOWIC facility. The main components of the Campus are anticipated to include:

- National Floating Wind Innovation Centre – situated in former Irvin House (now renamed W-Zero-1) which has been acquired, renovated and re-purposed as the centrepiece of the Campus to support innovation and commercialisation in floating offshore wind.
- FLOWIC will anchor the Offshore Wind Campus and be a key early enabler for researchers and innovative / transitioning companies to locate within ETZ as part of a strong industry cluster that is immediately accessible to Aberdeen South Harbour and the 18GW of offshore wind development that is planned within 100 nautical miles of Aberdeen.
- The FLOWIC Centre is to be operated by Ore Catapult provide facilities for the following:
 - Digital Simulation and Modelling
 - Testing and validation of floating wind components / structures
 - Collaboration and joint working between academia and industry
- In addition to housing FLOWIC, the refurbished W-Zero-1 building will provide flexible office and light industrial accommodation for innovative companies operating in the energy transition supply chain and renewable sectors.
- Offshore wind supply chain development within flexible industrial units – new-build development opportunities where suitable to provide modern high-value manufacturing capabilities and allowing for co-locations within existing sites and buildings within the Altens Industrial Estate



- Linked to FLOWIC the plots within the site are well suited to accommodating facilities for test, validation and certification processes associated with offshore wind and the renewable energy supply-chain. These uses will benefit from close proximity to Aberdeen South Harbour and may require external areas for operation and/or specialist equipment which benefit from co-location to FLOWIC, other energy transition users, and setting adjacent to Altens Industrial Estate.


Brownfield land within the Campus may also be utilised for wider energy transition activity that can positively complement FLOWIC and associated offshore wind supply chain. Land within the Campus at Hareness Road has been identified as a preferred site for development of the 'Hydrogen Hub' to be delivered by bp Aberdeen Hydrogen Energy Ltd.

The Hydrogen Hub is proposed to operate as a green hydrogen production and re-fuelling facility, which would serve the Council's fleet of buses, HGVs, and large vans to support transport decarbonisation and advance the take-up of hydrogen technologies in the city. Hydrogen will be produced on-site via electrolysis, utilising green power from the planned Ness Solar Farm, located approximately 1.5km to the north and connected via an underground cable.

Masterplan Development Guidance

The Offshore Wind Campus incorporates brownfield land for a mix of energy transition activities, anchored by the National Floating Wind Innovation Centre delivered in partnership with ORE Catapult.

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| <p>Land Use</p>  | <p>Development within the Campus should be for a mix of building typologies in Class 4 (Commercial / Light Industrial), Class 5 (Industrial) and Class 6 (Distribution) - providing flexible units with scale / facilities suitable for energy transition activities and supply chain.</p> <p>The National Floating Wind Innovation Centre will operate as a centre for innovation and house facilities for research, test & demonstration, and start-up / SME / innovator businesses in the energy transition supply chain – within Class 4 (Business) and potentially an element of Class 10 (Non-residential institutions).</p> <p>Elements of on-site infrastructure and development may be Sui-Generis use class, reflecting their highly specific nature and should be considered on their merits and with regard to their suitability within an energy transition and industrial cluster.</p> <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: B1 (Business & Industrial Land) |
| <p>Design Quality</p>  | <p>Development within the Offshore Wind Campus should:</p> <ul style="list-style-type: none"> Develop a coherent and structured Campus layout with high-quality amenity, landscaping and frontages that enhance place quality on Hareness Road. Ensure development integrates with local landscape and townscape character. Building form and massing should reflect standard industrial typologies with heights in the range of 10-15m (eaves height) subject to land uses and specific end-user requirements. Develop a signage strategy for the Campus integrated and referenced with wider Hareness Road signage and ETZ branding. Provide for sustainable development that minimises resource use and total energy demand through passive and active measures, and integrate renewable energy technologies within development. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: D1 (Quality Placemaking), D2 (Amenity), D3 (Big Buildings), D4 (Landscape), D5 (Landscape Design), R6 (Low and Zero Carbon Buildings). ACC Supplementary Guidance: Big Buildings, Landscape, Resources for New Development. |

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| <p>Transport & Connectivity</p>  | <p>Development within the Offshore Wind Campus should:</p> <ul style="list-style-type: none"> Create safe and attractive routes for walking and cycling across the area - ensuring active travel routes link to employment sites and make connections to wider Core Path and leisure path networks. Provide principal access from Hareness Road – with detailed junction siting / design requirements to be agreed in consultation with ACC Roads & Highways and integrate with planned upgrades to Hareness Road. Proposals should be coordinated with planned ACC enhancement work (including road widening) to the Coast Road, noting potential for associated land requirements within at Hareness Road. Support Active Travel integration with covered and secured cycle parking facilities, along with car parking in accordance with ACC Standards (including EV Charging to support low-carbon journeys). <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: T1 (Land for Transport), T2 (Sustainable Transport), T3 (Parking). ACC Supplementary Guidance: Transport & Accessibility. |
|---|---|

Infrastructure



Development within the Offshore Wind Campus should:

- Ensure that all development is designed to be flood resilient and does not increase the current or future risk of flooding to surrounding land. Surface water management must be incorporated including sustainable flood risk management (SuDS) and appropriate blue-green infrastructures. Where possible development should integrate with existing SuDS and drainage infrastructure between Coast Road and Hareness Road.
- Allow for ducting and wayleaves as appropriate to future-proof development connections to potential utility and renewable energy networks which may emerge within ETZ.
- Consider regulatory requirements that may arise from on-site production and/or storage of hydrogen (if required) – potentially including COMAH / HSC / PPC licensing. Development involving hydrogen storage should be consulted at an early stage with the Health & Safety Executive, SEPA, and ACC to ensure risk management, health & safety, and operational processes are fully coordinated.

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: R6 (Low and Zero-Carbon Buildings), R7 (Renewable and Low Carbon Energy Developments), R8 (Heat Networks), NE4 (Our Water Environment),
- ACC Supplementary Guidance: Flooding, Drainage & Water Quality, Resources for New Development.



Existing industrial sites and brownfield land should be incorporated with a focus on sustainable retro-fit and re-purposing.



Vacant Business & Employment allocated land at the edge of Altens – suitable for a range of potential energy transition activities and supply-chain..

Landscape & Environment



Development of the Offshore Wind Campus has the potential to result in impacts to the local environment. Development should be designed and delivered in accordance with the environmental mitigation hierarchy to reduce these impacts as far as possible, integrate with environmental projects in the Community & Energy Coast Programme, and contribute to the overall net gain of biodiversity across the masterplan area.

The principles of environmental mitigation that all development within the Offshore Wind Campus should follow will include:

Avoiding impacts through

- Developing within designated Employment Land allocations and outside of Green Belt / Green Network areas, and well removed from sensitive receptors.
- Retaining existing woodland / hedge-row belts to site perimeter and ensuring appropriate separation from development.
- Completion of comprehensive pre-development surveys of ecology / ground conditions / drainage to inform design development.

Minimising the significance of impacts through:

- Pro-active management of potential construction impacts through a CEMP
- Operational controls on hours of use / outdoor activity for noise-generating uses and siting potential noise generating uses to be distant from noise-sensitive receptors. Future development may be informed by Noise Impact Assessment to inform specific mitigations.

Mitigating impacts through:

- Defined landscape framework for development plots, emphasising strong amenity frontage supported by landscape shelterbelts/native woodlands to site boundaries and along Hareness Road.
- SuDS infrastructure should be positioned to complement landscaping and provide additional campus amenity. Where possible SuDS features should integrate into existing blue-green infrastructure and network corridors.
- Delivering high-quality of design and detailing to site development – contributing positively to character and local amenity of Altens Industrial Estate.

Compensating for impacts through

- Incorporation of tree planting and other habitat features within the soft landscaping of development plots to provide amenity and support biodiversity. Planting should include native tree species & hedgerows to support habitat connectivity.
- Incorporation of green roofs to development plots where feasible to soften visual impact of buildings and create additional roofscape habitat.
- Relevant planning policies and associated guidance to be considered in the development of future planning applications include:
- Local Development Plan Policies: NE1 (Green Belt), NE2 (Green & Blue Infrastructure), NE3 (Our Natural Heritage), NE4 (Our Water Environment), NE5 (Trees & Woodland), WB1 (Healthy Developments), WB2 (Air Quality), WB3 (Noise).
- ACC Supplementary Guidance: Landscape, Natural Heritage, Trees & Woodlands, Green Space Network and Open Space, Air Quality, Noise.



**Illustrative Concept
Floating Offshore Wind Innovation Centre with Hydrogen Hub and R&D and Support Facilities**

INDICATIVE MASTERPLAN

The masterplan layout and design principles are captured within the campus layouts for the Offshore Wind Campus. These reflect design guidance and address site constraints and opportunities along with issues and points raised during engagement with partners, stakeholders and the local community.

Development Proposals

- 1 Flexible re-purposing and retro-fit of existing building to house innovation / R&D / commercialisation facilities for the energy transition supply chain – including National Floating Wind Innovation Centre (FLOWIC).
- 2 Hydrogen Hub to be developed by BP Aberdeen Hydrogen Energy Ltd as a production and re-fuelling facility – complementing wider energy transition activity.
- 3 Flexible industrial units suitable for offshore wind and wider energy transition supply chain – benefitting from proximity to Aberdeen South Harbour and planned upgrade to Coast Road.
- 4 Flexible external areas suitable for test & demonstration activity – complementing activity with FLOWIC and/or energy transition supply chain.
- 5 Opportunities for renewal and investment of brownfield land within Altens Industrial Estate enabled by ETZ.

Strategic Mitigations & Compensations

- 6 SuDS integrated with existing blue-green infrastructure and network corridors, complementing landscaping and adding to overall site amenity.
- 7 Site boundary treatments and landscape buffers incorporating native planting and trees to ensure no loss of woodland cover, and to enhance overall campus amenity and biodiversity
- 8 Plot Landscape Frameworks across the Campus incorporating planting and landscaping within development plots to mitigate the visual impact of development and add to site biodiversity – potentially including green roofs, living walls, and other landscape features.



**Illustrative Concept
Floating Offshore Wind Innovation Centre within Existing Irvin House**



4.5 INNOVATION CAMPUS

The Innovation Campus will seek to deliver a mix of industrial / commercial typologies (offices/ workshop/ services support space) providing space for energy transition businesses to locate within the Zone and have ready access to educational and commercial partners and related services infrastructure.

Anchored by ETZ Ltd’s Energy Incubator & Scale-Up Hub and seeking to grow to other sites over time, the Campus will be targeted at smaller businesses, providing flexible industrial, workshop, and office units for innovative companies looking to start-up, expand, or diversify within energy transition sectors. It will support the growth of a renewed industrial cluster in Aberdeen that builds on existing strengths and attracts new innovations in renewable technologies, services, and manufacturing.

Development Vision

Innovation and support for new and growing business is at the core of the ETZ mission and requires the provision of space and service/enterprise support for energy transition activity that includes small start-up business to large international inward investment. ETZ will be the location for starting and growing an energy transition enterprise, providing support for commercialisation of industry applications and services. The Innovation Campus will provide the space, facilities and networks that drive this, accelerating investment and attracting smart, ambitious, entrepreneurial companies to the region.

Innovation Campus – Planning & Policy Overview

The Innovation Campus will be anchored by ETZ Ltd’s delivery of the ‘Energy Incubator & Scale-Up Hub’ (EISH) to be situated on vacant land (formerly Trafalgar House) at Hareness Road, at the centre of Altens Industrial Estate. The site and all surrounding areas with Altens which are potentially suitable for future expansion are designated as ‘Business & Employment’ land within the LDP. The EISH site benefits from two extant planning permissions:

- Detailed planning permission (210429/DPP) was granted in July 2021 for development at the western portion of the site (approximately one third), adjacent to Ian Wood House. Approved development was for: “erection of multi-let / start-up units in Class 5 and 6 with ancillary office and associated parking, infrastructure and landscaping”
- Planning permission in principle (210138/PPP) was granted in May 2021 for development at the eastern portion of the site. Approved development was for: “Commercial development, Class 5 and 6 use (circa 5,000 sqm floorspace), with associated infrastructure and landscaping”.
- **Planning permission (230371/DPP) was granted to ETZ Ltd. in August 2023 for erection of the ETZ Energy Incubator Scale-Up Hub on the western portion of the site, comprising two single storey ‘Scale-Up Unit’ workshop / warehouse buildings and a two storey ‘Collaboration Hub’ and workshop building.**

| POLICY | Summary Extract |
|-----------|--|
| Policy B1 | <p>“Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types.</p> <p>... New business and industrial land proposals shall make provision for areas of recreational and amenity open space, areas of strategic landscaping, areas of wildlife value and footpaths, in accordance with the Open Space Strategy and any approved non-statutory planning guidance, planning briefs or masterplans”</p> |



Local Development Plan (LDP)

Innovation Campus



**Illustrative Concept
Innovation Campus with Serviced Offices, Flexible Workspace, R&D and Support Services**

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Site Opportunities & Constraints

The site of the former Trafalgar House is cleared brownfield land with few constraints to flexible / multi-user industrial development supporting energy transition activity. Site boundaries are well defined relative to surrounding industrial users and Hareness Road from which the site is accessed via a roundabout (shared with Ian Wood House to the west).

The EISH site is centrally located within Altens Industrial Estate. In close proximity to this site and across the wider area there are a number of brownfield investment opportunities for future expansion to form a multi-site Campus.

| Opportunities | Constraints |
|---|--|
| <ul style="list-style-type: none"> • Cleared brownfield site suitable for industrial redevelopment – flexible configuration / layout for multi-let. • Direct access to Hareness Road and key movement corridor. • Situated at the heart of Altens Industrial Estate in a prominent and accessible location. Strong ‘anchor’ to support future growth of Campus to other sites. • Landscape / amenity frontage to site onto Hareness Road. | <ul style="list-style-type: none"> • Existing residential unit located opposite on Hareness Road. • Potential for contaminated land associated with former industrial use. |

Investment & Development Proposition

The Innovation Campus seeks to provide flexible business space suitable for industrial, R&D, commercial energy transition activity in a highly accessible location, alongside targeted enterprise and business support from institutional partners. The main components of the Campus are anticipated to include:



- Priority development of the EISH on Hareness Road as the key ‘anchor’ investment in the Campus. Over time and as the Energy Transition Zone (and operators within it) matures, the Campus will grow and diversify. It will seek to incorporate additional brownfield land within Altens and East Tullos to provide a multi-site enterprise cluster with a greater mix and flexibility of units that can act as ‘grow-on’ space.


- Flexible industrial / commercial units across a range of sizes - allowing for companies looking for flexible office / hot-desk arrangements, up to medium-scale workshop / dry lab units for companies directly involved in technology development and supply chain services. Provision of a central ‘hub’ providing common facilities including conference / meeting space, café, networking, test & demo technologies (3d printing, VR).
- On-site presence from institutional and academic partners to provide on-site mentoring and support to businesses and facilitate the creation of pathways from R&D, to test & demonstration, to commercialisation, to scale-up. The EISH will be delivered and managed by ETZ Ltd in partnership with Scottish Enterprise, Net Zero Technology Centre (NZTC) and National Manufacturing Institute Scotland (NMIS), with NMIS operating a satellite facility within. Partnering arrangements are also proposed with University of Aberdeen and Robert Gordon University. In combination these partners will offer integrated technical and wider enterprise / commercial support to growing businesses to complement the physical accommodation and facilities within the Campus.
- Close integration and connection to facilities within other Campuses across ETZ including Hydrogen Test & Demonstration Facility and National Floating Wind Innovation Centre (FLOWIC) to provide opportunities for cross-collaboration and supply-chain growth, as well as connections to wider research and academic institutions that are driving net zero innovation across the region such as NESAs and OreCatapult.

Development Guidance

The Masterplan Development Guidance relates to the anchor development of the EISH at the former Trafalgar House site, comprising a total area of approximately 2.56 hectares situated on the north side of Hareness Road. It is anticipated that this may be delivered in two phases, to enable the facility (and businesses therein) to become established and then grow in scale over time.

Future growth of the Campus to additional sites will adhere to the same principles, with a focus on sustainable redevelopment of brownfield land for flexible industrial use suitable for start-up / SME / innovator companies and complementing wider ETZ investment programmes.

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| <p>Land Use</p>  | <p>Land use within the Innovation Campus should predominantly comprise flexible Class 5 (General Industrial) and Class 6 (Storage or Distribution), reflecting a mix of start-up / SME / innovator companies in the energy transition supply chain. Complementary Class 4 (Business / Light Industrial) uses may be provided, providing flexible / shared workspace environment as well as housing common amenities and facilities for occupiers of the Campus.</p> <p>It is anticipated that a first phase of the Campus will develop on the western portion of the site, providing up to 3,000 sqm in line with extant planning permission 210429/DPP. Development should be distributed across blocks providing multi-let industrial / commercial units in a mix of sizes / typologies.</p> <p>Future / later-phase expansion of the Campus may incorporate land to the east. Development should maintain parameters establish by extant Planning Permission in Principle (210138/PPP) for circa 5,000 sqm floorspace.</p> <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: B1 (Business & Industrial Land) |
| <p>Design Quality</p>  | <p>Development within the Innovation Campus should:</p> <ul style="list-style-type: none"> Develop a coherent and structured Campus layout with high-quality amenity, landscaping and frontages that enhance place quality on Hareness Road. Ensure development integrates with local landscape and townscape character. Building heights should follow principles established within the current planning permissions, providing 2-3 storey commercial and industrial units. Develop a signage strategy for the Campus integrated/referenced with wider Hareness Road signage and ETZ branding. Provide for sustainable development that minimises resource use and total energy demand through passive and active measures, and where feasible integrate renewable energy technologies within development. Create flexible development units that respond to market requirements and offer flexibility of tenure/licensing for small and growing businesses. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: D1 (Quality Placemaking), D2 (Amenity), D4 (Landscape), D5 (Landscape Design), R6 (Low and Zero Carbon Buildings). ACC Supplementary Guidance: Landscape, Resources for New Development |

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| <p>Transport & Connectivity</p>  | <p>Development within the Innovation Campus should:</p> <ul style="list-style-type: none"> Create safe and attractive routes for walking and cycling across the area - ensuring active travel routes link to employment sites and make connections to wider Core Path and leisure path networks. This should include positive integration with planned upgrade to active travel routes / connections on Hareness Road. Take principal access from Hareness Road, via the existing roundabout junction which currently serves the site. Specific design requirements to be agreed in consultation with ACC Roads & Highways and integrate with planned upgrades to Hareness Road. Consider potential for delivery of a new priority access junction to the east of the roundabout that may be introduced to support larger vehicle access to the site (as per the current planning permission). Support Active Travel integration with covered and secured cycle parking facilities, along with car parking in accordance with ACC Standards (including EV Charging to support low-carbon journeys). Provide adequate areas within the site for loading / servicing for industrial / commercial occupiers. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: T1 (Land for Transport), T2 (Sustainable Transport), T3 (Parking). ACC Supplementary Guidance: Transport & Accessibility. |
|---|---|

Infrastructure



Development within the Innovation Campus should:

- Allow for ducting and wayleaves as appropriate to future-proof development connections to potential utility and renewable energy networks which may emerge within ETZ.
- Ensure that development incorporates measures for treatment of surface water drainage and to minimise the risk of flooding – through combination of permeable surfaces, soakaways, and other SuDS features (as appropriate / required).

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: R6 (Low and Zero-Carbon Buildings), R7 (Renewable and Low Carbon Energy Developments), R8 (Heat Networks), NE4 (Our Water Environment).
- ACC Supplementary Guidance: Flooding, Drainage & Water Quality, Resources for New Development.



Vacant Business & Employment allocated land at the centre of Altens Industrial Estate – suitable for a mix of industrial typologies to support growing energy transition businesses.



Development should seek to provide landscape frontage that enhances the amenity and place-quality on Hareness Road.

Landscape & Environment



The Innovation Campus is situated on brownfield land within the Altens Industrial Estate, with limited potential for direct impacts to sensitive environmental receptors or local landscape. Development should nonetheless be designed and delivered to ensure that any potential for impacts is minimised in accordance with the mitigation hierarchy. Where possible it should incorporate enhancements to the local environment, including integration with environmental projects in the Community & Energy Coast Programme and contributing to the overall net gain of biodiversity across the masterplan area.

The principles of environmental mitigation that all development within the Innovation Campus should follow will include:

The principles of environmental mitigation that all development within the Innovation Campus should follow will include:

Avoiding impacts through

- Development within designated Employment Land allocations and outside of Green Belt / Green Network areas and well removed from sensitive receptors.
- Productive re-use / redevelopment of vacant brownfield land.
- Completion of comprehensive pre-development surveys of ground conditions / drainage to inform design development.

Minimising the significance of impacts through:

- Pro-active management of potential construction impacts through a CEMP.
- Operational controls on hours of use / outdoor activity for noise-generating uses (as appropriate) and siting potential noise generating uses to be distant from noise-sensitive receptors.

Mitigating impacts through:

- Defined landscape framework for the site emphasising strong amenity frontage supported by landscape shelterbelts/native planting to site boundaries. Development should maintain and seek to enhance existing set-backs from Hareness Road – providing landscape buffer with opportunities for planting.
- Opportunities for landscaping within the site forecourt / parking areas should also be considered to sub-divide areas and define boundaries.
- Delivering high-quality of design and detailing to site development – contributing positively to character and local amenity of Altens Industrial Estate.

Compensating for impacts through

- Incorporation of tree planting and other habitat features within the soft landscaping of development plots to provide amenity and support biodiversity. Planting should include native tree species & hedgerows to support habitat connectivity.
- Incorporation of green roofs to development plots where possible to soften visual impact of buildings and create additional roofscape habitat.

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan: NE2 (Green & Blue Infrastructure), NE3 (Our NE4 (Our Water Environment), NE5 (Trees & Woodland), WB1 (Healthy Developments), WB2 (Air Quality), WB3 (Noise).
- ACC Supplementary Guidance: Landscape, Air Quality, Noise.



INDICATIVE MASTERPLAN

The masterplan layout and design principles are captured within the campus layouts for the Innovation Campus. These reflect design guidance and address site constraints and opportunities along with issues and points raised during engagement with partners, stakeholders and the local community.

Development Proposals

- 1 Flexible industrial units in mix of sizes and typologies suitable for start-up and innovator companies operating in energy transition supply chain.
- 2 Office / R&D / flexible workspace with shared amenities and on-site support services for growing energy transition companies – incorporating conference / meeting space, café, networking, test & demonstration technologies.
- 3 Defined areas for car / cycle parking and servicing – including adequate capacity for loading / servicing for industrial and commercial occupiers.
- 4 Principal site access from Hareness Road, via the existing roundabout junction which currently serves the sites. Specific design requirements to be agreed in consultation with ACC Roads and integrate with planned active travel upgrades to Hareness Road.

Strategic Mitigations & Compensations

- 5 Development set back from Hareness Road creating well defined and attractive frontage, supported by landscaping and planting to enhance overall site amenity and add to biodiversity within Altens Industrial Estate.
- 6 Landscape Frameworks for the Campus incorporating planting and landscaping within site forecourt and parking areas to sub-divide and define boundaries and contribute to overall enhancement of biodiversity. Built development may also incorporate landscape measures potentially including green roofs, living walls to soften the visual impact of development and create additional habitat.



Illustrative Concept
Innovation Campus with Serviced Offices, Flexible Workspace,
R&D and Support Services



Skills Campus

4.6 SKILLS CAMPUS

Essential to the long-term success of the Energy Transition Zone will be providing leading-edge education and training infrastructure that can support and enhance the existing local skills base in Aberdeen and renew its position as a global leader in the energy sector for the 21st century. To facilitate this the masterplan includes proposals for a Skills Campus, to provide specialist and purpose-designed facilities for education and skills development around energy transition technologies and industries.

Development Vision


The Skills Campus sits at the heart of the Energy Transition Zone, clustered around a core formed by the existing NESCoI Campus. Through ETZ investment and partnership working it will provide new bespoke education & training facilities for net zero, utilising brownfield land for development of an Advanced Manufacturing Skills Hub (AMSH) aiming to accelerate the next generation of supply-chain skills and knowledge for Aberdeen. The facility will be fully accessible to the community as a net zero hub offering flexible spaces suitable for a range of learning and networking activities, as well as widening access to training & re-skilling opportunities.

Skills Campus – Planning & Policy Overview

The Skills Campus is situated on brownfield land at Hareness Road, at the centre of Altens Industrial Estate. The existing building (Former Muller Dairies site) is in industrial use. The site and all surrounding areas are designated as 'Business & Employment' land within the LDP.

Planning permission (210775/DPP) was granted in September 2021 for "erection of extension to form cold store / dispatch area", though the development has not been initiated.

A planning application (231098/DPP) was submitted in September 2023 for change of use of the existing building from Class 6 (Distribution Centre) to Class 10 (Educational Facilities) along with external alternations and associated parking and landscaping.

| POLICY | Summary Extract |
|---|--|
| Policy B1  | <p>"Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types.</p> <p>...</p> <p>New business and industrial land proposals shall make provision for areas of recreational and amenity open space, areas of strategic landscaping, areas of wildlife value and footpaths, in accordance with the Open Space Strategy and any approved non-statutory planning guidance, planning briefs or masterplans"</p> |



Local Development Plan (LDP)



Illustrative Concept
Skills Campus providing specialist and purpose-designed facilities for education and skills

Site Opportunities & Constraints

The site is under-utilised brownfield land with few constraints to redevelopment and/or extension for development to support energy transition. Site boundaries are well defined relative to surrounding industrial users and Hareness Road / Minto Avenue from which the site is accessed.

The existing NESCol Campus is situated immediately to the east providing strong opportunity for co-located activity and a strong cluster of education and skills activity that complements the industrial function within Altens.

| Opportunities | Constraints |
|--|--|
| <ul style="list-style-type: none"> • Brownfield site suitable for industrial redevelopment / extension • Co-location to NESCol Altens Campus • Net zero retro-fit of existing industrial building for energy-efficiency. • Direct access to Hareness Road and key movement corridor • Situated at the heart of Altens Industrial Estate in a prominent and accessible location. • Landscape / amenity frontage to site onto Hareness Road. | <ul style="list-style-type: none"> • Potential for contaminated land associated with former industrial use. |

Investment & Development Proposition

NESCol Altens Campus is in the heart of the Energy Transition Zone, though is currently an understated facility in terms of its visible presence to Hareness Road especially, and in its wider connection to local communities, or to surrounding industrial users in the energy sector. The Skills Campus seeks to create a new cluster around NESCol, providing renewed opportunities for extension of its facilities and opportunities for enhanced skills and training.

The College’s current facilities are geared towards traditional engineering, automotive and construction skills. Opportunities to expand the College’s offering of training facilities are limited by the current configuration. In the face of changing technologies, increasing automation, and transition to net zero carbon there is a need to refresh and extend facilities to provide future student cohorts with more modern and advanced training in engineering trades, manufacturing, and service sectors that meet the needs of a changing energy industry.

The creation of a purpose-developed skills and training facility , extending space available to NESCol may also allow for the provision of new courses / training programmes within existing buildings, potentially tailored towards future trades / skills associated with energy transition such as electric vehicle maintenance, and domestic technology upgrades such as heat pump installation, hydrogen boilers, and new insulation techniques.

Alongside the new-build elements of the Skills Campus, the masterplan therefore supports longer-term enhancement and renewal of the existing NESCol facilities, to improve the student experience and to give a stronger profile and visual connection to Hareness Road frontage against which one of the Campus’ main blocks is sited.

Through development of the new-build elements of the Skills Campus, the masterplan supports and seeks to facilitate longer-term enhancement and renewal of the adjacent NESCol facilities. This will be led by NESCol and will consider opportunities to provide a stronger profile and visual connection to Hareness Road frontage against which one of the Campus’ main blocks is sited. Through future investment there is potential for NESCol to further strengthen its role as an ‘anchor’ institution within the ETZ, and to form a key part of the corridor on Hareness Road that provides facilities for innovation, skills development, and commercialisation around energy transition.



Illustrative Concept
Skills Campus providing specialist and purpose-designed facilities for education and skills

Advanced Manufacture Skills Hub

Extending and adding to the existing NESCol facilities, the core project within the Skills Campus is the development of an Advanced Manufacturing Skills Hub (AMSH) to be situated on land adjacent to NESCol at Hareness Road. The AMSH is proposed to be developed through adaptive re-use and extension of an existing building and associated brownfield land, adopting Circular Economy principles and minimising its environmental impact. It will form an effective extension to the current NESCol facilities and provide new capabilities to grow and sustain the skills base within the Energy Transition Zone.

While continuing to be developed as a detailed project, it is anticipated that the AMSH will include the following facilities and features:

- Flexible teaching and demonstration space with equipment showcasing future green technologies and skills to students, visitors and the community.
- Welding & Fabrication Academy – modernised workshop facilities showcasing innovative practices, flexible welding booths, augmented reality welding zone for students and commercial clients. Key skill which will be in demand as offshore wind construction accelerates through 2020's and 2030's.
- Model “industrial lab” concept – in the form for a mobile manufacturing skills lab to engage regional schools in STEM subjects, demonstrate clean-fuel technologies.
- Advanced manufacturing demonstrator equipment including laser scanning, 3d printing, and remote-controlled robotics.
- Next-gen’ teaching including virtual reality / artificial intelligence to support advanced manufacturing processes and skills needed for the energy transition.
- The space will also support mobile manufacturing skills lab that can be used to extend the facility’s reach by visiting local schools to promote clean fuel technologies and energy sector careers.

Design and delivery of the building will also explore opportunities to provide net zero ‘exemplar’ development in terms of configuration, circular economy construction, and energy efficiency, including on-site renewable energy generation (wind / solar), battery storage , and potential for future hydrogen integration.



The facility will be open and accessible to the local community, with flexible space available for use by local groups for a range of activities and events that could include Men’s Sheds, local craft / activity groups, or simply as a meeting space for local organisations. While principally an educational facility, it is intended to be used throughout evenings and weekends, to make full use of its potential to support social and ‘third-sector’ activities around net zero, health & wellbeing, and community cohesion.


The future operation of the Skills Hub is to be led by NESCol as an extension of their existing facilities, while also extending local accessibility to programmes promoting upskilling and reskilling. NESCol will operate in collaboration and partnership with specialist institutions such as National Manufacturing Institute Scotland (NMIS), National Energy Skills Accelerator (NESA), Engineering Construction Industry Training Board (ECITB), Offshore Petroleum Industry Training Organisation (OPITO), as well as industry partners seeking to support specific training cohorts which can lead to direct employment opportunities for students. This will support delivery of a specialised curriculum so that students are trained in the skills required for energy transition employment, as well as ensuring that there is a skilled local workforce that meets the needs of offshore wind, hydrogen, and wider renewables sectors.

The Skills Campus will strengthen the profile and capacity for engagement for NESCol as the key education and training asset within the ETZ, in particular with the community and local industrial sectors. It will support career pathways within ETZ for young people, providing access to applied education and skills development opportunities that are directly relevant to energy transition and the changing face of the energy sector.

Development Guidance

Retain and support the extension of existing education and training facilities. Support new development and renewal / regeneration of currently under-utilised land around Hareness Road and Minto Avenue where this provides additional education and training facilities for energy transition / net zero activity. Extensions and amendments to existing buildings to enhance the provision of education and training facilities are also supported where these enhance the character and townscape of the area and incorporate high-quality materials.

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| <p>Land Use</p>  | <p>Land use within the Skills Campus should seek to extend and complement the existing uses within NESCol’s Altens Campus. It should provide facilities for practical training and skills development in energy transition and associated sectors –supporting the industrial cluster at Altens and around Aberdeen South Harbour. This should principally comprise Class 10 (Non-residential institution), and potential elements of ancillary Class 4 (Business), purpose developed and operated as an educational facility.</p> <p>New facilities should be accessible and available for use by the community, with operation seeking to facilitate evening and weekend use for local groups / activities.</p> <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: B1 (Business & Industrial Land). |
| <p>Design Quality</p>  | <p>Development within the Skills Campus should:</p> <ul style="list-style-type: none"> Regenerate and re-purpose existing building(s) on the site in line with the principles of Circular Economy and sustainable design. This may include adaptive re-use and enhancement of existing building fabric, and extension to create space for new facilities. Create strong street frontages including site landscape and amenity features, enhancing the place quality on Hareness Road and shaping a defined Campus identity that positively complements existing NESCol Campus. Incorporate signage / wayfinding for the Campus and educational facilities therein – complementing wider Hareness Road signage and ETZ branding. Design for multi-purpose, flexible and adaptable buildings that can serve wide range of training / teaching / educational uses and suitable for wider community functions. Provide for sustainable development that minimises resource use and total energy demand through passive and active measures, and where feasible integrate renewable energy technologies within development. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: D1 (Quality Placemaking), D2 (Amenity), D4 (Landscape), D5 (Landscape Design), R6 (Low and Zero Carbon Buildings). ACC Supplementary Guidance: Landscape, Resources for New Development. |

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| <p>Transport & Connectivity</p>  | <p>Development within the Skills Campus should:</p> <ul style="list-style-type: none"> Create safe and attractive routes for walking and cycling across the area - ensuring active travel routes link to employment sites and make connections to wider Core Path and leisure path networks. This should include positive integration with planned upgrade to active travel routes / connections on Hareness Road. Take principal accesses from Hareness Road / Minto Avenue, via existing junctions which serve the site. Any proposed amendment to site access / junctions should be agreed in consultation with ACC Roads & Highways and integrate with planned upgrades to Hareness Road. Support Active Travel integration with covered and secured cycle parking facilities, along with car parking in accordance with ACC Standards (including EV Charging to support low-carbon journeys). Provide adequate areas within the site for servicing of the development. Opportunities for external areas within the site to be utilised for clustering of food & drink vans and other mobile/ temporary uses that add to the amenity and place-quality of Altens should be explored given the sites location at the heart of the Estate and adjacency to NESCol. <p>Relevant planning policies and associated guidance to be considered in the development of future planning applications include:</p> <ul style="list-style-type: none"> Local Development Plan Policies: T1 (Land for Transport), T2 (Sustainable Transport), T3 (Parking). ACC Supplementary Guidance: Transport & Accessibility. |
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Development should complement the existing NESCol Campus in Altens.

Infrastructure



Development within the Skills Campus should:

- Allow for ducting and wayleaves as appropriate to future-proof development connections to potential utility and renewable energy networks which may emerge within ETZ.
- Ensure that development incorporates measures for treatment of surface water drainage and to minimise the risk of flooding – through combination of permeable surfaces, soakaways, and other SuDS features (as appropriate / required).

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan Policies: R6 (Low and Zero-Carbon Buildings), R7 (Renewable and Low Carbon Energy Developments), R8 (Heat Networks), NE4 (Our Water Environment).
- ACC Supplementary Guidance: Flooding, Drainage & Water Quality, Resources for New Development.



Development should seek to enhance the frontage to Hareness Road and integrate with planned active travel measures.



Industrial land at the heart of Altens with potential for net-zero focused retro-fit and re-purposing to provide new skills & training facilities.

Landscape & Environment



The Skills Campus is situated on brownfield land within the Altens Industrial Estate, with limited potential for direct impacts to sensitive environmental receptors or local landscape. Development should nonetheless be designed and delivered to ensure that any potential for impacts is minimised in accordance with the mitigation hierarchy. Where possible it should incorporate enhancements to the local environment, including integration with environmental projects in the Community & Energy Coast Programme and contributing to the overall net gain of biodiversity across the masterplan area.

The principles of environmental mitigation that all development within the Innovation Campus should follow will include:

Avoiding impacts through

- Development within designated Employment Land allocations and outside of Green Belt / Green Network areas and well removed from sensitive receptors.
- Productive re-use / redevelopment of vacant brownfield land.
- Completion of comprehensive pre-development surveys of ground conditions / drainage to inform design development.

Minimising the significance of impacts through:

- Pro-active management of potential construction impacts through a Construction & Environmental Management Plan (CEMP).
- Operational controls on hours of use / outdoor activity for noise-generating uses (as appropriate). and siting potential noise generating uses to be distant from noise-sensitive receptors.

Mitigating impacts through:

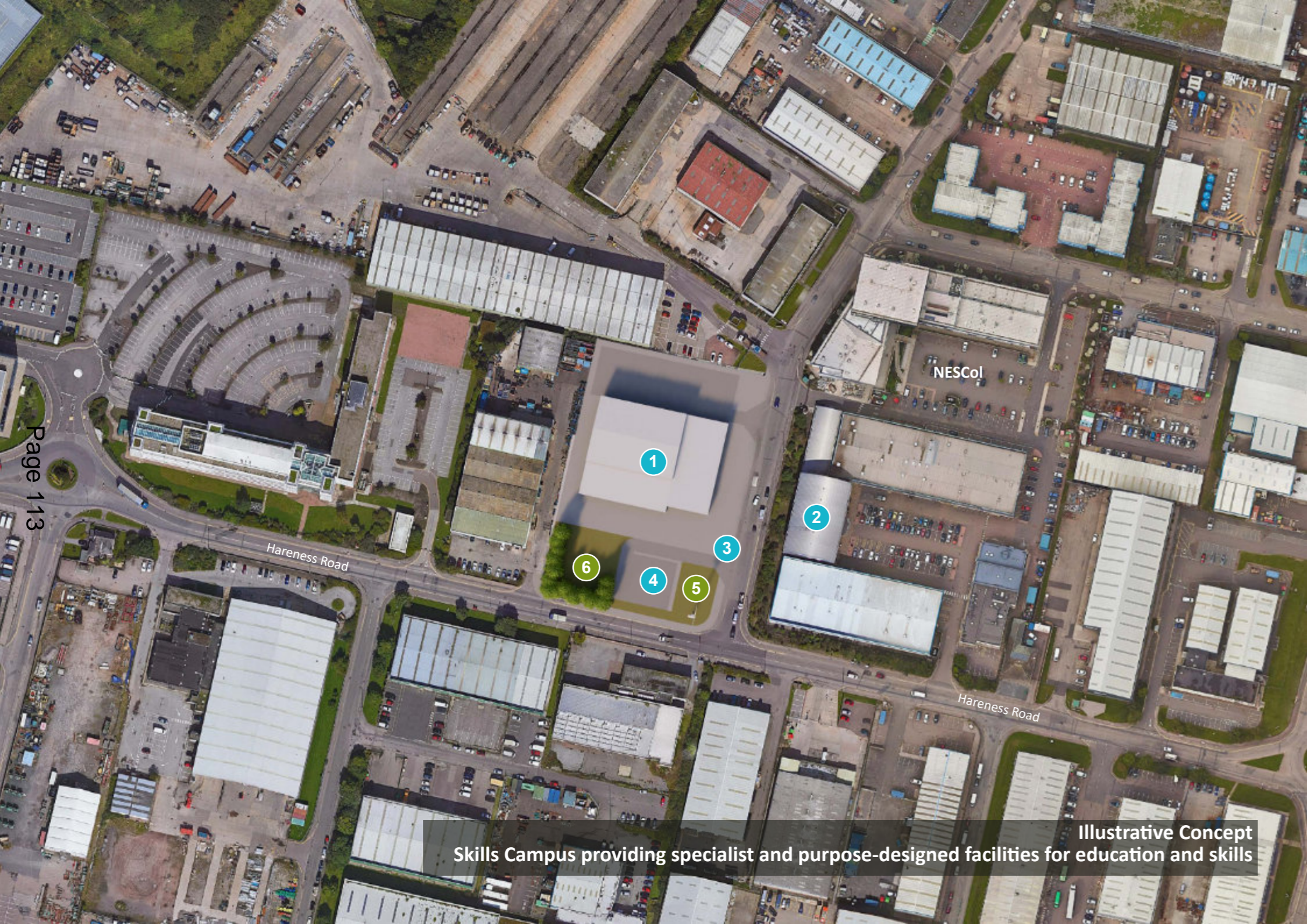
- Defined landscape framework for the site with a strong amenity frontage supported by landscape shelterbelts/native planting to site boundaries and along Hareness Road / Minto Avenue boundaries. Development should maintain and seek to enhance existing set-backs from Hareness Road – providing landscape buffer with opportunities for planting.
- Opportunities for landscaping within the site forecourt / parking areas should also be considered to sub-divide areas and define boundaries.
- Delivering high-quality of design and detailing to site development – contributing positively to character and local amenity of Altens Industrial Estate.

Compensating for impacts through

- Incorporation of tree planting and other habitat features within the soft landscaping of development to provide amenity and support biodiversity. Planting should include native tree species & hedgerows to support habitat connectivity and add to the amenity of Altens Industrial Estate.
- Incorporation of green roofs to development where possible to soften visual impact of buildings and create additional roofscape habitat.

Relevant planning policies and associated guidance to be considered in the development of future planning applications include:

- Local Development Plan: NE2 (Green & Blue Infrastructure), NE3 (Our NE4 (Our Water Environment), NE5 (Trees & Woodland), WB1 (Healthy Developments), WB2 (Air Quality), WB3 (Noise).
- ACC Supplementary Guidance: Landscape, Air Quality, Noise.



INDICATIVE MASTERPLAN

The masterplan layout and design principles are illustrated within the campus layouts for the Skills Campus. The site of the proposed Advanced Manufacturing Skills Hub comprises a total site area of approximately 1 hectare, situated on the north side of Hareness Road, with the existing NESCol Campus on the opposite side of Minto Avenue forming the remainder of the Campus.

Development Proposals

- 1 Advanced Manufacturing Skills Hub (AMSH) – re-purposing and retro-fitting vacant and under-utilised building in line with Circular Economy principles to provide a new centre for training and skills development around energy transition.
- 2 Existing NESCol Campus to which AMSH will form an effective extension, strengthening the profile and capacity of NESCol as the key education and training asset within the ETZ.
- 3 Principal site access from Hareness Road / Minto Avenue, via the existing entrance to the site. Specific design requirements to be agreed in consultation with ACC Roads and integrate with planned active travel upgrades to Hareness Road.
- 4 Under-utilised land within the sites provides opportunity for clustering of food & drink and other temporary/mobile uses that add to Campus quality and amenity at heart of Altens – subject to further review with ACC and operators.

Strategic Mitigations & Compensations

- 5 Development set back from Hareness Road creating well defined and attractive frontage, supported by landscaping and planting to enhance overall site amenity and add to biodiversity within Altens Industrial Estate.
- 6 Landscape Frameworks for the Campus incorporating planting and landscaping within site forecourt and parking areas to sub-divide and define boundaries and contribute to overall enhancement of biodiversity. Built development may also incorporate landscape measures potentially including green roofs, living walls to soften the visual impact of development and create additional habitat.

Illustrative Concept
Skills Campus providing specialist and purpose-designed facilities for education and skills

Torry

East Tullos
Industrial Estate

Aberdeen
South Harbour

Tullos Hill

Altens
Industrial Estate

05

Supporting Infrastructure

Long-term sustainable development across the ETZ area will require a range of enabling infrastructures to underpin place-making. As well as supporting development activity, infrastructure should positively contribute to wider qualities of Successful Places such as adapting to climate change, restoring biodiversity loss, improving health & well-being, and maintaining an active local economy.

The supporting infrastructure will help create a more sustainable, liveable and productive place and provide the basis from which economic, community, and environmental projects can be delivered across the Zone. It includes functional infrastructures such as road networks and connections, rail freight opportunities, low-carbon energy, utilities and services, as well Local Place infrastructures such as community facilities, habitat connectivity, active travel routes, and greenspace enhancements which ETZ is seeking to directly invest in through the 'Community & Energy Coast' programme.

5.1 BROWNFIELD LAND RENEWAL

ETZ are developing a major Brownfield Land Development programme across Altens and East Tullos Industrial Estates. ETZ's commitment to the circular economy starts with the maximising the value of existing allocated industrial land assets and ensuring brownfield land is prioritised and brought back into use.

The priorities are:

- Address the principals of the Circular Economy.
- Prioritise Brownfield Land for redevelopment.
- Support the re-development and re-purposing of existing buildings.
- Upgrading buildings to higher specification / Low Carbon / Energy Efficiency.
- Develop a portfolio of market-ready sites and buildings.

Brownfield land redevelopment helps support renewal of industrial land assets, strengthens place quality, safeguard and restore natural assets, promote re-use of vacant / derelict land and buildings and ensure the approach to development focuses has both a strong place and net zero focus. The re-use of vacant sites also provides opportunities to support restoration of environmental assets through enhanced biodiversity and habitat development as well as assisting in mitigating and adapting to the effects of climate change.

The programme is seeking to acquire or and/or invest with partners to redevelop land and buildings and ensure a portfolio of sites and buildings to meet a range of needs is available within the ETZ. The programme provides for:

- ETZ / landowner collaboration and investment to renew brownfield land and raise quality / profile of Altens and East Tullos Industrial Estates as key destinations for energy transition industries.
- Progressive site upgrading and the re-positioning of existing industrial land and building assets within Altens and East Tullos Industrial Estates to provide market-ready buildings that provide modern occupier requirements and are suitable for energy transition users.
- Building refurbishment will incorporate circular economy principles, promoting energy-efficiency improvements and take advantage of opportunities to generate low-carbon energy through roof-top solar panels and other renewables.
- Developing across the portfolio of new build and refurbished buildings a Net Zero Building Exemplar (Base: Standards Compliant/ Low Carbon: Upgrade Energy Efficiency / Net Zero: Full Building Retrofit Exemplar) as a demonstrator of energy efficiency/low carbon building refurbishment.
- Advancement of a number of Pilot Projects including buildings such as former Irvin House (W-Zero-1) and at Minto Avenue (W-Zero-2), Hareness Rd, Greenwell Rd and Peterseat Drive.
- Supporting as a priority brownfield land redevelopment and brownfield renewal across the ETZ masterplan area and maximising its potential as an industrial base for Aberdeen's energy transition and supply chain.
- Seeking to add stronger amenity and place-quality to Altens and East Tullos as business destinations – working with Aberdeen City Council and landowners to actively enhance key frontages, boundaries, property assets and signage.
- Working with Partners to support development common service facilities within the Hareness Road Corridor, including a potential Mobility Hub to integrate with local public transport, and to facilitate better management of food and beverage vans.

5.2 ROAD INFRASTRUCTURE

Transport connectivity for Aberdeen South Harbour, ETZ sites and local industrial has been subject to detailed Transport Assessments (STAG Appraisals) to ensure appropriate access between the strategic road network, harbour and proposed ETZ area.

These studies build on the ongoing Wellington Road Multi-modal Corridor Study and set out a preferred option for the Coast Road Upgrade (Wellington Road to Aberdeen South Harbour).

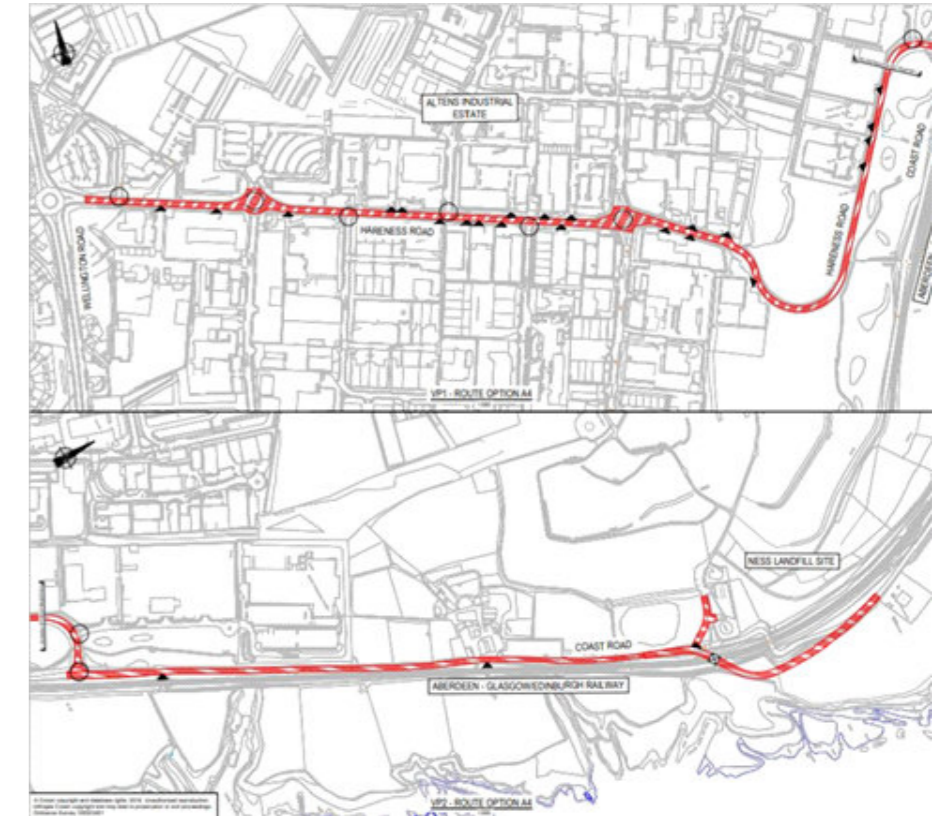
Essential to realising the full potential of development within ETZ will be the development of high-quality transport accessibility (marine/ rail/ road including integrated active travel) connecting the Aberdeen South Harbour, and all sites within the Zone. The proposals within the masterplan build on the ongoing Wellington Road Multi-modal Corridor Study and Coast Road Upgrade (Wellington Road to Aberdeen South Harbour) studies.

Within specific Campuses, the Masterplan has also identified opportunities where ETZ and Partners can actively invest in new infrastructure that will complement committed projects and create a highly connected and accessible net zero industrial cluster.

Planned road infrastructure enhancements within the Masterplan area are:

Hareness Road & Coast Road

The Coast Road is the key access route to Aberdeen South Harbour from the A956 / A92 / A90, as well as connecting the LDP Opportunity Sites (OP56 /OP61/ OP62) and brownfield land within Altens. It is the primary vehicle movement corridor for the Masterplan and key sites within.



External Transportation Links to Aberdeen South Harbour (Updated Strategic Business Case – August 2021). Preliminary Feasibility Design Study for preferred Option – showing extent of potential works with key junctions and access on the existing route, and indicative railway bridge crossing

ACC are currently progressing through design stages and detailed options assessment for a full upgrade of the Coast Road and Hareness Road (known as ‘External Transport Links to Aberdeen South Harbour’). The project scope includes replacement of the existing signalised rail bridge crossing to address constrained horizontal geometry and limited accessibility for larger / wider abnormal loads, as well as improving journey times.

The upgraded Coast Road will therefore enable full accessibility to Aberdeen South Harbour including for freight transport and form the primary access route for vehicle movements to/from the Harbour, ensuring that freight movement through nearby communities in Torry and Balnagask is minimised.

The upgraded route will incorporate active travel measures – with dedicated footway and cycleway provision on sections of Hareness Road and Coast Road to strengthen low-carbon connectivity across the area.

While subject to ongoing design and detailed technical appraisal of route options, it is anticipated that the upgrade works will be completed in 2026-2027. ETZ Ltd and future Partners will continue to engage with ACC Roads to ensure alignment of works programmes and coordination of design and delivery through the Coast Road corridor.

Wellington Road – Multi-Modal Corridor

Wellington Road is currently the primary traffic route into Aberdeen and the Masterplan Area from the south. Issues of traffic congestion, air quality, and lack of walking / cycling accessibility have been identified. The northern section of the Wellington Road, from Balnagask Road to Victoria Bridge, is designated as an Air Quality Management Area.

In addition to the Coast Road upgrade works, ACC have preliminarily identified a programme of improvement works to Wellington Road, to support multi-modal accessibility across the corridor from the A92 junction to Wellington Bridge. The Project has progressed through STAG 1 & 2 and recommended a package of works including cycleways, bus lanes, pedestrian crossings to enable greater use of the corridor by multiple modes of transport. The project will support efficient freight movement to / from Aberdeen South Harbour and the ETZ, and positively complements the development of a fully accessible energy transition and industrial cluster.

Recommended works include conversion of Hareness Road roundabout to a signalised junction with integrated pedestrian and cycle crossing facilities. More detailed options appraisal and technical design work (including OBC/FBC) is to be undertaken to further define the scope of the project and a programme for delivery.

In addition to road infrastructure works planned by ACC, the Masterplan has identified potential delivery of new roads to enable development and strengthen connectivity within the area.

Coast Road Re-Alignment (Marine Gateway) – Within the Marine Gateway, the option of re-aligning a section of the Coast Road situated between St Fittick’s Park and Aberdeen South Harbour is identified. A re-alignment of the road in-land to cross a section of the park (within OP56 / OP62 Opportunity Sites) would segregate port activity from local travel and transport movement and create a long-term secure boundary to all port activity. The re-aligned road would incorporate full active travel provision to maintain Core Path and National Cycle Routes through the area. Further detailed design must consider and ensure coordination of the following (in consultation with ACC, Nestrans, and Port of Aberdeen):

- Design Manual for Roads and Bridges and National Roads Development Guide (SCOTS) standards and ensuring appropriate horizontal / vertical alignments for expected traffic volumes and vehicle loads.
- Accesses to/from Aberdeen South Harbour and ensuring freight / abnormal load vehicle movements are directed southbound from the Harbour.

- Maintaining accessibility of buses to Aberdeen South Harbour and integrating with bus stop / turning areas within the Harbour.
- Provision of lay-by parking and potential for EV charging within re-aligned section of the road facilitating access for recreational users and people of limited mobility.
- Provision of dedicated footway and cycleways and connection to existing active travel routes through the area.
- Provision of road lighting and signage.
- Boundary treatments and landscaping within the road corridor, with particular regard to the setting of St Fittick’s Church (Scheduled Monument) and providing a long-term strong boundary for St Fittick’s Park. This must consider levels and sectional details as they relate to the Church and road corridor.
- Integration with planned Coast Road upgrade works programme being delivered by ACC.

Peterseat Drive – Coast Road Link (Hydrogen Campus) - Within the Hydrogen Campus, the Masterplan has identified opportunity to create a new road link between Peterseat Drive and the Coast Road (crossing the Doonies (OP61) site). The road link would serve development plots within the Campus and offer improved industrial access to Altens. It would situate Peterseat Drive at the centre of the Masterplan, extending travel connectivity and transforming the potential of existing industrial units, as well as wider catalysing effects for brownfield land within Altens.

The Link Road would complement the planned Coast Road upgrade. Subject to programme it can support delivery of the Coast Road and reduce disruption by providing an alternative route to the South Harbour and adding further capacity to the network south of Aberdeen South Harbour. Further detailed design must consider and ensure coordination of the following (in consultation with ACC and Nestrans):

- Design Manual for Roads and Bridges and National Roads Development Guide (SCOTS) standards and ensuring appropriate horizontal / vertical alignments for expected traffic volumes and vehicle loads.
- Potential further road re-alignment within Altens around Minto Avenue / Peterseat Drive to improve movement for heavy goods / extra wide loads and ensure brownfield sites can fully contribute to land availability within the ETZ.

- Design and siting of junction with the Coast Road.
- Provision of lay-by parking as part of the new road link, and potential for EV charging provision.
- Provision of dedicated footway and cycleways and connection to existing active travel routes through the area.
- Provision of road lighting and signage.
- Boundary treatments and landscaping within the road corridor.
- Integration with planned Coast Road upgrade works programme being delivered by ACC.

Both road infrastructure proposals within the Masterplan have been subject to preliminary design and technical review, including consultation with ACC Roads and Nestrans to identify key issues for further consideration. This has confirmed their in-principal feasibility and potential as complementary projects that can add to transport connectivity across the Masterplan area.

ETZ Signage & Branding – Linked to delivery of road infrastructure, the delivery of enhanced signage and branding within key movement corridors can support stronger sense of place and identify within the ETZ.

Hareness Road provides one of the primary spines and will develop as multi-user destination with industrial, innovation / start-up, and education / skills uses. Delivery of development sites and road infrastructure on Hareness Road and across Altens should take opportunity to incorporate ETZ branding and signage that enhances place quality and supports stronger awareness of the cluster. The Masterplan encourages a range of interventions to be developed in consultation with ACC and Development Partners (e.g. NESCol) that could include gateway features, banners, improved lighting, and signage and frontage treatments that form a complimentary package of works to the road improvements noted above.

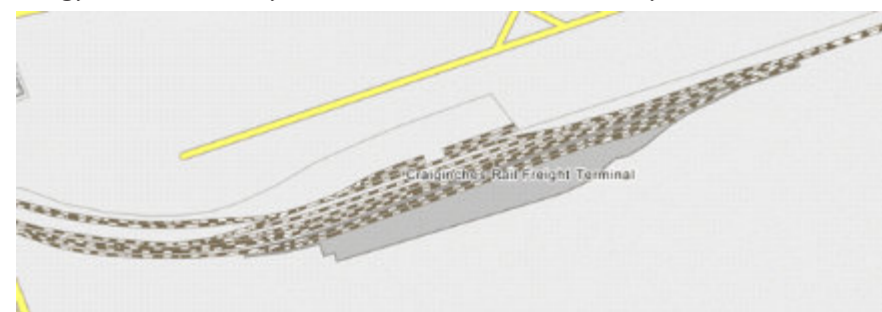
5.3 RAIL FREIGHT INFRASTRUCTURE

Craiginches freight yards at East Tullos present a future development opportunity, which is currently under-utilised (particularly south of the railway on Greenwell Road).

The site is relatively constrained by surrounding development, limiting opportunities for expansion beyond its current scale. It does provide opportunity for low-carbon rail freight to serve existing industrial activity and energy transition activity across the Campuses or elsewhere within East Tullos / Altens, facilitating modal shift from road to rail freight.

The integration within the Energy Transition Zone of a functional rail hub would complement the strong low-carbon marine and road transport accessibility and potentially create a differentiated offer for East Tullos which would support its longer-term renewal. In particular, the potential for Hydrogen re-fuelling and/or distribution should be explored as technologies continue to develop, working in partnership with ACC's Hydrogen Hub and long-term programme to promote the city as a market-leader in this sector, which has clear alignment with ETZ vision and objectives.

The masterplan therefore supports the long-term retention and renewal of the rail freight **infrastructure** as an asset. Opportunities to optimise the potential of the **freight yards** should continue to be actively explored between ETZ Ltd, Nestrans, and Aberdeen City Council, including means to integrate effectively with energy transition activity within Altens and Marine Gateway.



Craiginches Rail Sidings

5.4 ENERGY & NET-ZERO INFRASTRUCTURE

Linked to the preparation of the Masterplan, ETZ Ltd have undertaken early review of future Energy Strategy to consider provision of low-carbon energy infrastructure within Campuses, suitable for the range of potential users across the Zone.

Detailed Energy Strategies for individual sites / Campuses will be developed as part of future planning, reflecting specific user needs and requirements, and seeking to incorporate the latest green energy technologies and best practices where feasible.

In the short term, it is anticipated that development within ETZ is likely to incorporate air-source heat-pump technologies – incorporated within Energy Centres serving specific buildings. Heat pumps are a relatively mature technology which utilise low grade heat and electricity to generate useable heat for space heating and hot water for buildings. New build development can be designed to accept lower temperate heat than traditional buildings. This enables heat pumps to operate at greater efficiencies.

In some instances, it may be feasible and offer greater energy efficiency to develop Campus Energy Centres and heat networks which can provide low-carbon, low-temperature heat across multiple plots / buildings within a Campus.

In parallel, opportunities across the ETZ to incorporate localised renewable energy production such as Solar PV or on-shore wind will be explored and positively considered where they can be integrated sustainably into development, and where they do not cause harm to the local environment, townscape / landscape character, or local amenity in accordance with LDP Policy R7.

Development of local heat networks and/or renewable energy should in all instances have regard to parallel green energy initiatives by Port of Aberdeen, Aberdeen City Council, Scottish Water, and other local development such as Ness Energy-from-Waste and associated Torry Heat Network and seek to positively coordinate and integrate delivery of green energy infrastructure across the area.

Subject to future development, technological advancement, and legislation, hydrogen may provide a significant opportunity to support local / Campus heat networks within the ETZ. Over the medium-longer term this could include transitioning to a higher temperature (if required) hydrogen boiler led network to serve new development. It is envisaged that in the short-term, generation of hydrogen will be restricted to a limited volume focussed on Test & Demonstration and for transport fuel replacement (bp Aberdeen Hydrogen Energy Ltd 'Hydrogen Hub').

Existing buildings within the ETZ (within Altens and East Tullos) are likely to require higher temperature heat. Opportunities to extend and connect local heat networks to serve existing buildings should be considered when the transition to hydrogen led heat is made. Hydrogen boilers can supply heat at temperatures equal to those currently required by existing building stock. Integrating existing buildings to a high temperature network could greatly reduce costs and disruptive retrofit requirements which would be required if they were to connect to a lower temperature, heat pump led network.

Complementary to ETZ Ltd's activity, Aberdeen City Council is actively exploring and developing District Heating Network opportunities. This includes developing a Heat Network connected to the Ness Energy-from-Waste Plant situated in East Tullos. Over time and subject to future feasibility this will seek to grow and connect with city-wide heating infrastructure, incorporating a range of low-carbon heat sources potentially including waste heat from processes within the Nigg Waste-Water Treatment Works and other industrial sources.

5.5 UTILITIES INFRASTRUCTURE & WASTE MANAGEMENT

The ETZ extends across a significant area combining a wide variety of land-uses sharing a range of utilities and with opportunity to develop utility networks delivering benefits across the zone. Existing utilities include power/water/drainage/digital and include a range of infrastructures including the Waste Water Treatment Works (WWTW) and SUEZ Recycling Facility and Ness EfW Facility.

Opportunities exist around developing energy generation connections with offshore wind, hydrogen, PV-solar production creating an energy network supporting industrial, transport (marine/railfreight/public transport) and commercial and domestic applications.

Energy & Utility Networks

Utility provision within development across the masterplan should include full suite of site servicing with digital, energy, and utility provision appropriately networked and future-proofed wherever possible to allow for future technologies / infrastructures to be incorporated.

Sustainable Urban Drainage

The masterplan will within plots require provision for sustainable drainage within all plots and sites integrated with site landscape and biodiversity measures and urban design detailing. Development areas sub-divided into plots will require a strategic site drainage strategy and appropriate planning for drainage and water impact assessments (DIA /WIA)

Water Infrastructure

The Nigg Bay Waste Water Treatment Works, situated within St Fittick's Park is a key element of water infrastructure for Aberdeen and the wider region. All proposed development adjacent to the WWTW and/or associated sub-terrain infrastructure must be closely coordinated with Scottish Water to ensure there are no operational impacts.

The masterplan area, including Opportunity Sites at St Fittick's Park, Gregness and Doonies Farm will be served by the Nigg Bay WWTW as well as the Invercappie Water Treatment Works and. Measures to provide for sustainable use of water across all development should be incorporated. A Pre-Development Enquiry should be submitted to Scottish Water at an early stage in design development to ensure appropriate future planning around network and capacity demand.

Waste Minimisation & Circular Economy

Promoting circular economy opportunity to minimise waste and adopt a Zero Waste planning approach should in all construction /related construction and operational activity promote waste minimisation and re-use of materials.



06

Masterplan Delivery

Altens Industrial Estate

Upgraded Coast Road

Doonies Farm

Tullos Wood

ABERDEEN

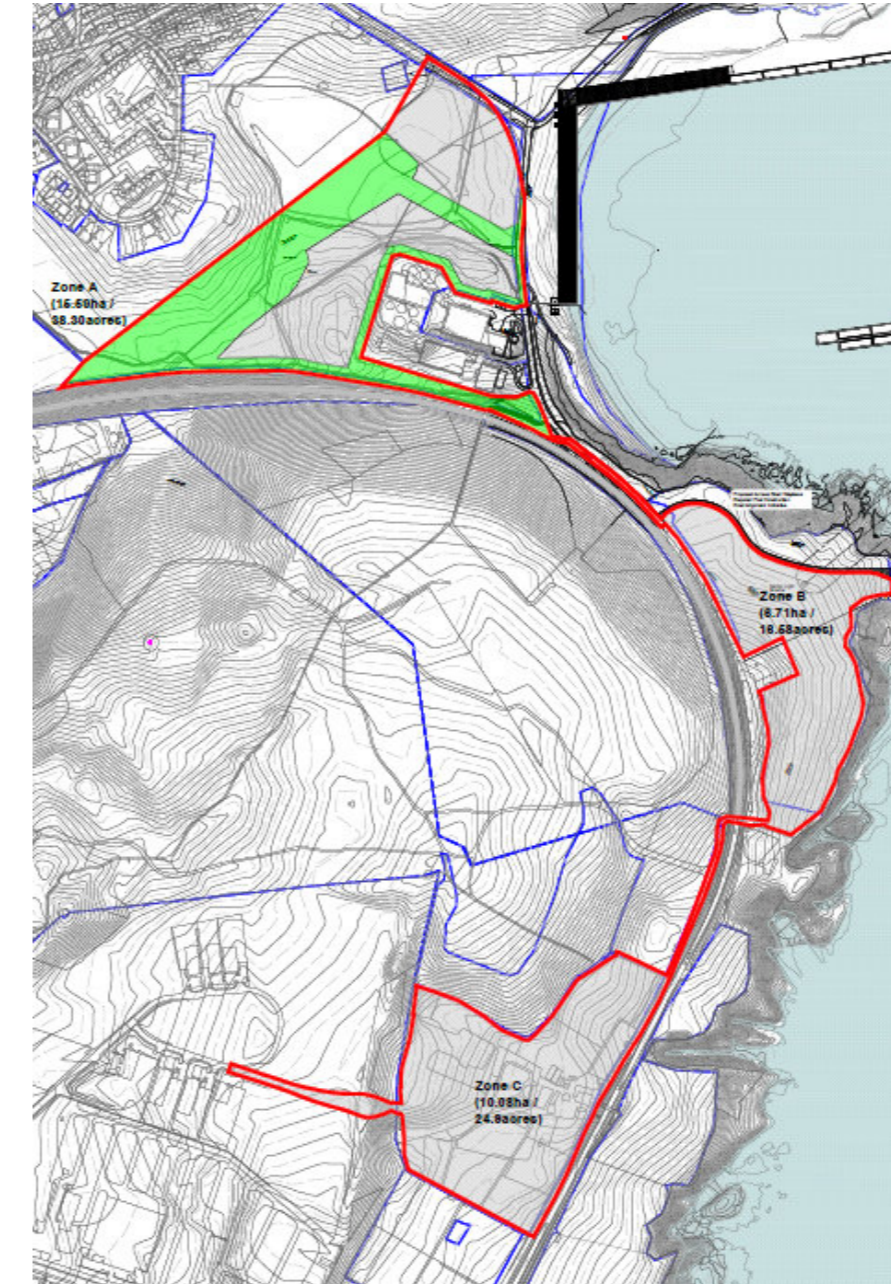
PLANNING & EIA

The Masterplan has been prepared for formal submission to Aberdeen City Council, for adoption as Supplementary Guidance in line with their established Masterplanning Process.

Aberdeen City Council will review and advance the Masterplan accordance with the *Aberdeen Masterplanning Process- Guide for Developers*. Following adoption as Supplementary Guidance the Masterplan will serve as a material consideration in the determination of future planning applications, and a framework for the assessment and setting of conditions and planning obligations.

The key reference documents for consideration in bringing forward this Masterplan are the Local Development Plan (LDP), National Planning Framework 4 (NPF4), and the relevant Aberdeen City Council Supplementary Planning documents and design guides.

The masterplan seeks to set an overall framework for development by a range of parties and stakeholders across the area, that will collectively contribute to the ambition of a thriving and market-leading cluster that places Aberdeen and the North-East at the heart of energy transition.



Indicative PPIP boundaries for development sites at OP56 (St Fittick's Park), OP61 (Doonies), and OP62 (Bay of Nigg).

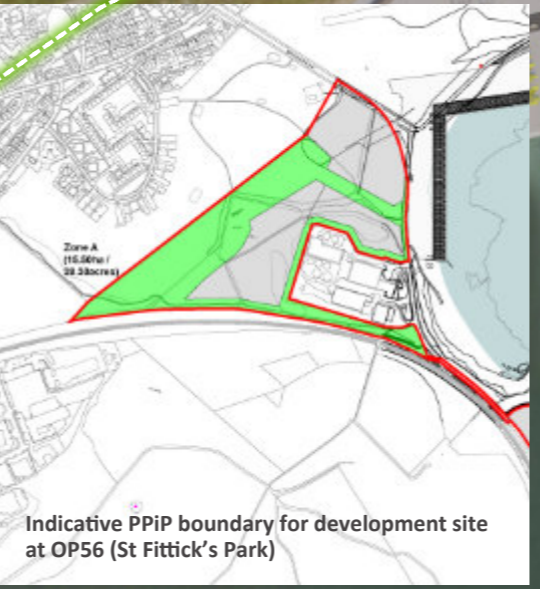
The masterplan therefore does not confer permission for development on any of the potential sites, though it is the current intention of ETZ Ltd to seek planning permission in principle for early-action development on land within the LDP identified Opportunity Sites OP56 (St Fittick's Park), OP61 (Doonies), and OP62 (Bay of Nigg) and directly adjoining areas required for delivery of linked infrastructure.

An indicative Site Location Plan for a future PPIP application is shown below, defining specific Development Zones (A,B,C) for these areas within an overall red-line boundary. **The final site location and boundaries will be defined through the PPIP application.**

Subject to progression of the Masterplan, it is anticipated that a PPIP application will be submitted in 2023, with advance pre-application consultation and engagement undertaken in line with Scottish Government and ACC requirements following submission of a Proposal of Application Notice.

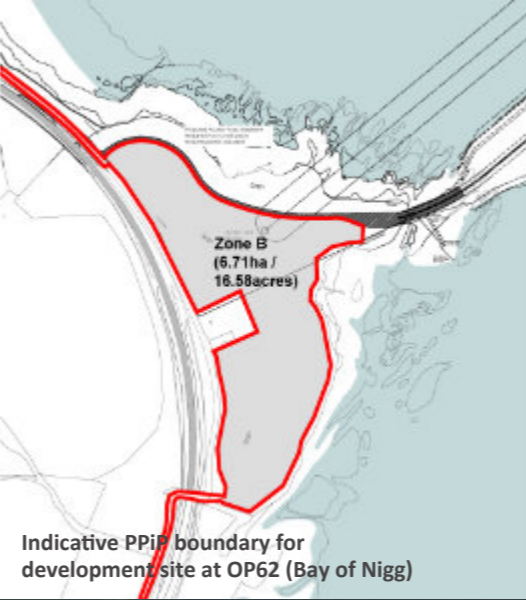
In line with the framework and Development Guidance set out within the Masterplan it is anticipated that Planning Permission in Principle (PPiP) will be sought for a mix of industrial uses (Class 4 / 5 / 6) and associated infrastructure works across the defined Development Zones, supporting the creating of an energy transition cluster.

Tabled below is an indication of likely development description for each Zone within the PPIP, along with linked measures of mitigation or compensation which have been identified within the Masterplan – such as pathway improvements, planting & landscaping, and wetland enhancement. Further detailed preparation of the PPIP and assessment by ACC and wider stakeholders during the determination period would inform the detailed wording of planning conditions and obligations to secure these measures (including for off-site works within the Masterplan area). These would control the timing and delivery of mitigation and compensation measures relative to the delivery of development, ensuring clear coordination of development and linked mitigations in line with the framework set by the Masterplan.



| Zone | Zone Name | Area (Ha) | Indicative GFA (m2) | Description | Linked Strategic Mitigation & Compensation Measures (identified through Masterplan) (further detailed site-specific mitigation to be confirmed through EIA / Transport Assessment and other technical assessments and conditioned as appropriate) |
|------|--------------|-----------|----------------------|--|--|
| A | St Fittick's | 15.5 | 10,000 – 15,000 sqm. | <ul style="list-style-type: none"> Development of flexible Class 4/5/6 business/ industrial uses for Energy Transition – focused towards high-value manufacturing and other port-integrated activity Re-alignment of the Coast Road through site – connecting to St Fittick's Road Retention and partial re-alignment of East Tullos Burn to form development plots Associated infrastructure including site accesses, external areas for parking and storage, active travel connections, site landscaping, SuDS, utility & service connections. | <ul style="list-style-type: none"> 1 Local Parklets – providing enhanced park facilities within currently under-utilised open space in close proximity to housing within Torry & Balnagask. Specific locations and amenities to be confirmed through future consultation and in coordination with ACC and local community. 2 St Fittick's Church Interpretation & Site Improvement Works – incorporating boundary treatment / landscaping along with provision of interpretive signage and conservation repair (to be developed in consultation with HES / ACC Archaeology) 3 St Fittick's Park Path Re-Alignment & Improvements – re-aligned and enhanced Core and local Path networks within St Fittick's Park – maintaining connectivity and access across the Green Network. 4 7 East Tullos Burn 2.0 & Wetland Enhancement including: <ul style="list-style-type: none"> 7 INNS management 8 9 Native species planting and habitat management for biodiversity 10 Boardwalk and wetland access 10 Water quality enhancement 6 Tullos Wood Access & Pathway Improvements – creating new entrance to Tullos Wood and more legible, accessible and direct route, along with associated pathway and landscaping improvements that can support interpretation and access to historic cairns 11 Coastal Path (Core Path 78 section from Aberdeen South Harbour and including Greyhope Road) – enhancement to path quality, interpretation and way-finding. Integrated with Coast Road re-alignment and South Harbour works. 12 Plot Landscape Frameworks – incorporating planting, landscaping (including Green Roofs where feasible) and Boundary Treatments to support biodiversity and habitat connectivity. 13 14 St Fittick's Park Enhancements – including potential extension and enhancement of Skate Park / BMX Pump Track / Play Facilities – adding to quality of facilities within the Park. To be agreed with ACC / local community and advanced through co-design. 15 Replacement & Compensatory Tree Planting – replacing trees to be removed through development and ensuring no overall loss of woodland cover. Informed by arboricultural survey and Landscape Framework. |

*Indicative floorspace ranges are derived from the illustrative layouts shown within the ETZ masterplan and would be confirmed within future PPIP application(s).



| Zone | Zone Name | Area (Ha) | Indicative GFA (m2) | Description | Linked Strategic Mitigation & Compensation Measures (identified through Masterplan) (further detailed site-specific mitigation to be confirmed through EIA / Transport Assessment and other technical assessments and conditioned as appropriate) |
|----------|-----------|-----------|---------------------|--|---|
| B | Gregness | 6.71 | 8,000 – 12,000 sqm | <ul style="list-style-type: none"> Development of flexible Class 4/5/6 business / industrial uses for Energy Transition- focused towards high-value manufacturing and other port-integrated activity Associated infrastructure including site accesses, external areas for parking and storage, active travel connections, site landscaping, SuDS, utility & service connections. <p>*Annotations 1-5 on plan opposite relate to Development Proposals for the site, including buildings, roads and accesses, as described in more detail on pg 100.</p> | <p>6</p> <ul style="list-style-type: none"> Plot Landscape Frameworks (including Green Roofs where feasible), native species planting and landscaping to add to campus amenity and biodiversity. Pollinator Coast & Habitat Connectivity – native species amenity landscaping and planting targeted coastal plant species addressing fragmentation and adding to site biodiversity. <p>7</p> <ul style="list-style-type: none"> Coastal Path (Core Path 78 section between Doonies and Aberdeen South Harbour) – enhancement to path quality, accessibility, interpretation and way-finding. Integrated with planned re-instatement around Gregness headland (as required by Aberdeen South Harbour permission). <p>8</p> <ul style="list-style-type: none"> Landscape screening and treatment within buffer and boundary zones, including native species suitable for coastal environment. <p>9</p> <ul style="list-style-type: none"> Height and massing to have regard to landscape sensitivity as well as changing setting and character around Aberdeen South Harbour – informed by LVIA. |

*Indicative floorspace ranges are derived from the illustrative layouts shown within the ETZ masterplan and would be confirmed within future PPIP application(s).

**Illustrative Plan
Marine Gateway**



| Zone | Zone Name | Area (Ha) | Indicative GFA (m2) | Description | Linked Strategic Mitigation & Compensation Measures (identified through Masterplan) (further detailed site-specific mitigation to be confirmed through EIA / Transport Assessment and other technical assessments and conditioned as appropriate) |
|------|-----------|-----------|----------------------|--|--|
| C | Doonies | 10.08 | 28,000 – 34,000 sqm. | <ul style="list-style-type: none"> Development of flexible Class 4/5/6 business / industrial uses within a Campus focused towards hydrogen and associated energy transition supply-chain activity. Provision of new road link crossing the site – connecting Coast Road to Peterseat Drive. Associated infrastructure including site accesses, external areas for parking and storage, active travel connections, site landscaping, SuDS, utility & service connections. <p>* Annotations 1-5 relate to Development Proposals for the site, including buildings, roads and accesses, as described in more detail on pg 114.</p> | <p>6 • Landscape screening and treatment within buffer and boundary zones, including native species and woodland.</p> <p>7 • Plot Landscape Frameworks (including Green Roofs where feasible). INNS removal and management, native species planting and landscaping to add to campus amenity and biodiversity.</p> <p>8 • On-site SuDS infrastructure complementing overall site amenity and adding to biodiversity</p> <p>9 • Coastal Path (Core Path 78 section from Doonies to Cove) – enhancement to path quality, accessibility, interpretation and way-finding – maintaining existing character as coastal walking route.</p> <p>10 • Retention and upgrade of on-site path networks – including connection to Tullos Wood as part of Green Network and integrated with active travel provision within new Link Road.</p> <p>11 • Pollinator Coast & Habitat Connectivity – native species amenity landscaping and planting targeted coastal plant species addressing fragmentation and adding to site biodiversity – including areas of former Ness Landfill in coordination with planned Solar Farm.</p> |

*Indicative floorspace ranges are derived from the illustrative layouts shown within the ETZ masterplan and would be confirmed within future PPIp application(s).

The PPIP will require comprehensive Environmental Impact Assessment. This will include assessment of full suite of environmental topics, assessing potential for environmental effects in line with EIA Regulations (2017) and where appropriate identifying necessary mitigation and compensatory measures to be provided. Significant baseline and technical appraisal / assessments have informed the masterplan process, and will continue to be built upon and extended as part of the full statutory Environmental Impact Assessment. While subject to EIA Scoping Opinion from Aberdeen City Council (in consultation with statutory consultees) to confirm the methodology and requirements of assessment, it is likely that and EIA for development of the Opportunity Sites will cover the following topics:

- Planning Policy
- Ecology, Nature Conservation & Biodiversity
- Water Environment, Drainage & Flood Risk
- Air Quality
- Landscape & Visual
- Traffic, Transport, Movement
- Disruption Due to Construction
- Population & Human Health
- Geology, Soils & Contaminated Land
- Greenhouse Gas Emissions
- Noise Environment
- Cultural Heritage
- Cumulative Impacts
- Others as Identified by Screening

In addition to Environmental Impact Assessment, further assessments and studies will be required to support a future PPIP application. The final list and scope of planning deliverables will be agreed with ACC through pre-application process but may include:

- Planning Supporting Statement
- Tree Survey
- Air Quality Assessment
- Flood Risk Assessment
- Construction Environmental Management Plan
- Biodiversity / Landscape Framework
- Transport Assessment
- Ground Conditions Report
- Noise Impact Assessment
- Drainage Assessment
- Ecological Surveys (incl. Habitats and Protected Species)

National and major developments (or those requiring EIA) will also require a Health Impact Assessment to consider potential for impacts on wider determinants of health such as poverty & inequality, physical exercise, safety, greenspace, and access to services, and how health benefits may be realised through development. ACC are currently preparing Aberdeen Planning Guidance on Health Impact Assessments and once adopted this should be followed in the preparation of assessment.

Separate from the planning consenting requirements, a CAR License will be required for the proposed re-alignment works to the East Tullos Burn. This will be developed in close consultation with SEPA and will require further detailed bathymetric / geomorphological survey, modelling, and design development of the Burn channel to ensure works are compliant.

The potential for works to St Fittick’s Church has also been identified within the Masterplan. The approach and detailed scope for mitigation and enhancement of the Church and its setting will be developed with HES and ACC Archaeology, but could require separate Scheduled Monument Consent. Development of other projects and infrastructure identified within the masterplan and supporting wider growth of the cluster (ie. those within LDP designated employment land) would be delivered through separate consents as necessary either by ETZ Ltd or other parties, and in line with the vision and overall framework established through the Masterplan.

As noted above, where planning applications within the ETZ require specific planning obligations to mitigate the impacts of development, these will be agreed with Aberdeen City Council during the determination of planning applications as required for individual sites and secured where appropriate or necessary through planning conditions and the mechanisms of a ‘Section 75’ or similar legal agreement.

Developer contributions may be sought to support infrastructure interventions across the ETZ area, and other local infrastructure improvements or mitigations required by proposed development. The scale of contributions will be agreed with Aberdeen City Council through planning application assessment and in line with the requirements of the Council’s Supplementary Guidance on Developer Obligations and Circular 3/2012 (Planning Obligations & Good Neighbour Agreements).

The initial phases of development within ETZ will be assessed and **consented against the Local Development Plan**, however future development and renewal of sites within ETZ over a longer time horizon of 5+ years may be brought forward in the context of future Development Plan(s). The ETZ Masterplan will remain a material consideration and the development guidance within should be considered in the planning and development process to ensure coordinated delivery across the Zone.

HABITATS REGULATIONS APPRAISAL

As competent authority, Aberdeen City Council have completed a Habitats Regulations Appraisal (HRA) Screening and Appropriate Assessment in relation to the Energy Transition Zone Masterplan, which will be made available on the Council’s website.

This concludes that, subject to appropriate mitigation measures in relation to habitats, otter, and mobile species (including birds), the proposals will not adversely effect the integrity of any protected sites (Special Areas of Conservation and Special Protection Areas) or their qualifying interests. Conservation objectives for the protected sites will be met during and after construction and following implementation and delivery of the recommended mitigations measures.

The mitigation measures proposed to ensure no adverse effects on the integrity of the protected sites are set out fully in an Appendix to the Masterplan. These are further detailed within an Environmental Impact Assessment, Site Biodiversity Action Plan(s) and other supporting assessments which will form part of future PPIP application(s) and associated conditions as these are secured.

It should be noted that it may be necessary to revise and/or renew the HRA in respect of future planning applications as they come forward and mitigation measures are further detailed.

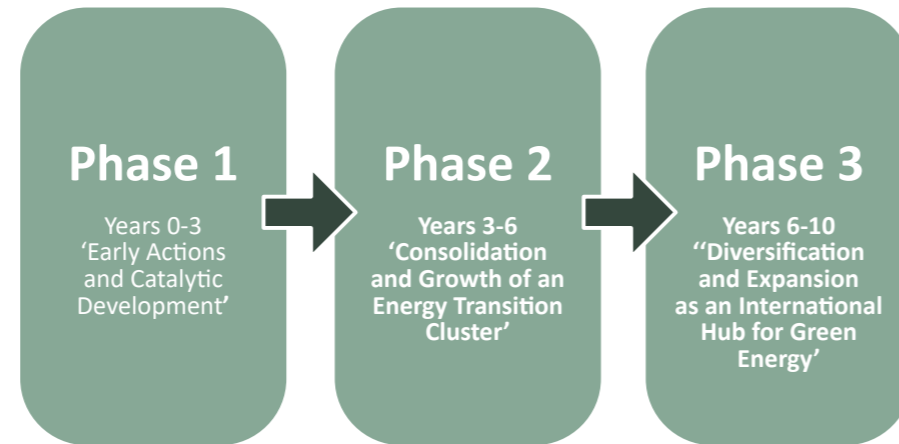
PHASING & DEVELOPMENT TIMELINE

The ETZ Masterplan seeks to provide a long-term planning document that sets out the relationships between place, project elements and local environment, and creates a spatial framework for future investment and development.

The ETZ programme for transition is an initiative for the next decade and beyond and it is important to consider the masterplan as a dynamic document that can be flexed and adjusted based on changing place, and investment needs over time.

- An indicative phasing timeline has been identified for the delivery of elements within the masterplan, seeking to balance delivery of development in response to market / investor demand, provision of supporting infrastructure, and managing impacts on local environment and communities. The indicative timeline sets out actions and potential projects led by ETZ Ltd., as well as complementary projects which will be led and delivered by key stakeholders across the area such as ACC, Port of Aberdeen, Nestrans, and future inward investors.
- The Phasing Strategy seeks to gradually establish and then grow in scale the campuses across ETZ. Key early actions that will facilitate the establishment of the ETZ Campuses on existing brownfield land are already well advanced, either benefitting from extant consents or utilising existing buildings, including creation of the National Floating Wind Innovation Centre, and development of the Energy Incubator and Scale-Up Hub.
- Critical to phasing and timely delivery of market-ready sites will be securing planning permission for development on identified Opportunity Sites. As noted above, it is the current intention of ETZ Ltd to progress planning permission in principle application in 2023 for these key sites, following further pre-application consultation with ACC and local communities.

- At this stage, the outlined approach to phasing is indicative and it should be recognised that exact sequence and timing of development will change in response to market drivers, partnership arrangements, project funding and feasibility, and other development factors. There will be overlap between phases and depending on market cycles and technological development it is likely that elements of the masterplan may be delivered quicker than others, to which supporting infrastructure will need to respond. Across the ETZ, development opportunities will be managed in consultation with ACC (and wider stakeholders) to ensure impacts are mitigated and supporting infrastructures delivered.
- Ensuring market-ready land / development sites is critical to success of Energy Transition Zone, especially with regard to current round of ScotWind leasing for which supply-chain is being established to enable build-out across the 2020's.
- In parallel with energy-transition focused development within Campuses, it is essential that supporting infrastructures are delivered, ensuring that benefits from development flow to local communities, that environmental assets are protected and enhanced through development, and that the physical transport and utilities infrastructures are in place to serve current and future phases of development.



Years 0-3– ‘Early Actions and Catalytic Development’



Energy Transition Zone Campuses

- **Enable the Marine Gateway and Hydrogen Campus** sites for inward investment focused around high-value manufacturing and energy transition supply-chain.
- Deliver **Green Hydrogen Test & Demo facility** (linked to ERM) as early action to catalyse development of the Hydrogen Campus. Support and enable the delivery of pioneering Green Hydrogen project including ERM, Vattenfall, and Hydrogen Hub (by bp Aberdeen Hydrogen Energy Ltd).
- Establish FLOWIC as a national centre for floating offshore wind R&D, test and validation and to anchor the Offshore Wind Campus.
- **Develop Energy Incubator and Scale-Up Hub** for growing businesses to locate in ETZ and as a catalyst for the Skills Campus
- **Develop Advanced Manufacturing Skills Hub** facility adjacent to and linked to NESCoI Altens Campus.



Community & Energy Coast




- Progress design and delivery of **enhancements to St Fittick's Park** and under-utilised green spaces in the locality – in collaboration with the local community.
- Enhanced access and **connectivity to Tullos Wood**.
- **East Tullos Burn 2.0 Project** to include re-alignment and lengthening of the Burn channel, improvement to water quality, and habitat development for Burn and wetlands.
- **Enhancement of biodiversity** across the area through Pollinator Coast, habitat management, and plot landscape frameworks.
- Enhancement of **active travel routes across the Green Network**, including the Coastal Path network as part of the ‘Energy Coast’.
- **Establish ETZ Community Fund** to help accelerate delivery of local development priorities.
- Implement **ETZ Jobs & Skills Plan** working with industry partners and local communities.






Enabling Infrastructures

- Support ACC delivery of **ASH Transportation Links Project** to upgrade Coast Road and provide enhanced connection (incl. HGV capability) between key ETZ nodes.
- Deliver **Peterseat-Doonies Road Link** as key enabling action to support development of the Hydrogen Campus, in coordination with ASH Transportation Links Delivery.
- Subject to development and investment requirements, deliver **Coast Road re-alignment** as part of Marine Gateway– strengthening access to key sites enabling port-contiguous developable areas.
- Support development of **Craiginchies Rail Freight Feasibility Study** to identify future options for de-carbonisation and integration of rail-freight into ETZ.
- Establish **a framework for net zero development**, including facilities management support throughout the ETZ Campuses.
- Utilise heat-pump technologies to sustainably meet building heat & energy needs. Support and enable delivery of **renewable energy technologies** including wind and solar across the Zone and linked to Campus development.
- Continue ETZ Ltd. programme of **partnering and co-investment in brownfield land** across Altens and East Tullos – renewing and strengthening the quality of industrial land assets with a focus on circular economy and energy efficiency.

Years 3-6 – ‘Consolidation and Growth of an Energy Transition Cluster’

| | |
|---|---|
|  | <p>Energy Transition Zone Campuses</p> <ul style="list-style-type: none"> • Attract and enable further high-value investment into ETZ Campuses to support their continued development and expansion. Focus towards high-value supply-chain services and activity meeting demand from ScotWind delivery and wider renewables sectors. • Expansion of Hydrogen Campus from Test & Demonstration to provide specialised technology and industrial units as sector matures and further manufacturing and supply-chain opportunities emerge. • Follow-on investment in brownfield land within the Offshore Wind Campus to meet growing supply-chain needs. • Expansion of Energy Incubator & Scale-Up Hub within Altens, extending across the full extent of its Hareness Road site and providing additional flexible space for growing businesses. • Consolidation of the Advanced Manufacturing Skills Hub and further development of specialist curriculum and training opportunities tailored to energy transition industries. |
|  | <p>Community & Energy Coast</p> <ul style="list-style-type: none"> • Support development and expansion of fully integrated active travel connections across Green Network, employment sites, and local community. • Further collaboration and liaison with local communities to identify opportunities for development of enhanced community / greenspace facilities. • Management and maintenance of East Tullos Burn and wetlands (in collaboration with ACC and community) to support enhanced water quality and biodiversity. • Continued management and enhancement of landscape for local biodiversity through Pollinator Coast and Plot Landscape Frameworks – in partnership with ACC and wider stakeholders. • Ongoing operation of ETZ Community Fund – supporting and enabling local priorities in collaboration with communities. • Ongoing implementation of Jobs & Skills Plan to support local job creation and skills development. |
|  | <p>Enabling Infrastructures</p> <ul style="list-style-type: none"> • Potential delivery by ACC of Wellington Road upgrade (subject to future programme review) to provide enhanced transport corridor suitable for all users, including priority junctions at Hareness Road providing key gateway to ETZ. • Potential development of a Mobility Hub at Hareness Road (NESCol) to complement road infrastructure improvements and integrate active travel and public transport movement. • Continue ETZ Ltd programme of partnering and co-investment in brownfield land across Altens and East Tullos – renewing and strengthening the quality of industrial land assets with a focus on circular economy and energy efficiency. • Create green energy Campus heat & power distribution centres utilising air source heat pump technologies (subject to feasibility) to service multiple buildings at greater efficiencies. |

Years 6-10 – ‘Diversification and Expansion as an International Hub for Green Energy’-

| | |
|---|--|
|  | <p>Energy Transition Zone Campuses</p> <ul style="list-style-type: none"> • ETZ Campuses fully established and developed as a thriving industrial cluster – leading Aberdeen and Scotland’s transition to net zero through development for high-value manufacturing, energy transition supply-chain, innovation, research & development, and skills & training. • Opportunities for further expansion and diversification of Campuses are explored in close collaboration with ACC, PoA, and local stakeholders – with priority on maximising potential of brownfield land to serve next generation of green energy development. • Continued renewal and investment into brownfield land within East Tullos and Altens to further support and grow the market-leading cluster of Energy Transition activity. |
|  | <p>Community & Energy Coast</p> <ul style="list-style-type: none"> • Collaborative management of local environment and landscape to enable long-term establishment of habitats that support biodiversity across the area, and support sustainable blue-green networks including East Tullos Burn. • Opportunities for further renewal, integration and expansion of active travel routes across the Green Network are explored with ACC, Nestrans, and other stakeholders as part of city-wide network. • Ongoing implementation and evolution of Jobs & Skills Plan in response to changing technologies and industry needs – supporting sustainable, long-term local job creation and skills development. |
|  | <p>Enabling Infrastructures</p> <ul style="list-style-type: none"> • Following earlier feasibility and options review, support investment and renewal of Craiginches Rail Freight Facility to enable multi-modal low-carbon transport links within the Zone. • Subject to future exploration of feasibility and technological readiness, seek to support Local Heat & Energy Networks. Incorporating hydrogen as primary zero-carbon fuel source and extending across Campuses to include existing and new-build development, as well as potentially connecting into city-wide district heating networks led by ACC. • Sustainable investment and renewal of local and strategic road network by ACC and Nestrans – supporting a fully accessible industrial cluster. • Subject to future demand and technological advancement, supporting opportunities for scaled-up hydrogen production and enabling connectivity and integration with city-wide infrastructures, facilities, and export capabilities. |

PROJECT PARTNERSHIPS & DELIVERY

To help deliver the vision and ambition for the region, ETZ Ltd will continue to work with core partners including Aberdeen City Council, Port of Aberdeen, and Scottish Enterprise – supported through funding from Opportunity North East and Scottish and UK Government. They will work collaboratively to share knowledge, develop complementary programmes, and support the alignment of interests to create a globally integrated energy cluster.

In addition to successfully deliver the ETZ, the project will continue to engage with a wider partnership featuring organisations including (but not limited to); Invest Aberdeen, SDI, NZTC, National Manufacturing Institute Scotland (NMIS), Global Underwater Hub, ORE Catapult, Nestrans, Robert Gordon and Aberdeen Universities, NESCol, and SDS.

ETZ Ltd are committed to local engagement and supporting the widest participation of communities in the delivery of programmes and projects, including working alongside communities as they draw down and fund local initiatives through the proposed Community Fund.

- The process of coordinating and preparing the masterplan has been led by ETZ Ltd, but delivery of the full potential of the Energy Transition Zone will require ongoing collaboration and partnership working with a wide range of groups. Engagement with communities has played a major role in developing the masterplan and the contribution, local knowledge and indeed challenge to the scope of projects has helped to identify mitigation measures and identify areas of opportunity for mitigation, compensation and enhancement.

- Minimising environmental impacts and impacts on local communities whilst providing opportunity to develop a more sustainable, inclusive and productive place will offer significant opportunity for co-design and collaboration around the detailed planning and design phases of the project. The masterplan sets out a range of committed projects that can build upon previous initiatives and programmes and support the ambitions of the Aberdeen South Locality Plan and wider Development Plan.

The proposed Campuses and supporting infrastructures across ETZ will be developed through ongoing collaboration between a wide range of partners and stakeholders – with ETZ Ltd seeking to take a leading role in coordinating and facilitating delivery. The matrices below highlight potential range of interests and contributions that will support delivery of projects and infrastructures.

ENERGY TRANSITION ZONE CAMPUSES - Partnership Delivery

| | ETZ Ltd | ACC | Community | Port of Aberdeen | Energy Transition Operators | Inward Investment | NESCol & NESA | Industry Bodies | Statutory Bodies / Others |
|------------------------------------|---------|-----|-----------|------------------|-----------------------------|-------------------|---------------|-----------------|---------------------------|
| Community & Energy Coast Programme | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ |
| Marine Gateway | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ |
| Hydrogen Campus | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ |
| Offshore Wind Campus | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ |
| Skills Campus | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ |
| Innovation Campus | ✓ | ✓ | ✓ | | ✓ | ✓ | | ✓ | ✓ |

ENERGY TRANSITION ZONE ENABLING INFRASTRUCTURES - Partnership Delivery

| | ETZ Ltd | ACC | Community | Port of Aberdeen | Nestrans | Transport Scotland | Network Rail | Scottish Water | Statutory Bodies & Agencies (e.g. SEPA / NatureScot) |
|----------------------------------|---------|-----|-----------|------------------|----------|--------------------|--------------|----------------|--|
| Rail Freight Infrastructure | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ |
| Road Infrastructure | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ |
| Energy & Net-Zero Infrastructure | ✓ | ✓ | ✓ | ✓ | | | | ✓ | ✓ |
| Utilities Infrastructure & Waste | ✓ | ✓ | ✓ | ✓ | | | | ✓ | ✓ |

✓ Key Delivery Partner & Stakeholder

✓ Potential Delivery Support & Interest

APPENDIX:

Habitats Regulations Appraisal: Mitigations

Relevant overarching mitigations for the **development** include:

1. Development of the site would adhere to environmental legislation and best practice guidance in relation to protection of human health and groundwater (and the water environment), and also to the appropriate management of soils during construction.
2. Potential impacts in relation to the natural environment will be assessed and addressed through the development of technical assessments, including Contaminated Land Assessment, Construction Environmental Plan (CEMP), Construction Traffic Management Plan and Noise Impact Assessment.
3. Operationally, the proposals will include a Landscape Framework supported by a Site Biodiversity Action Plan.
4. Furthermore, it is however anticipated that detailed mitigation measures, if required, will be included as part of any detailed planning application for proposals within land covered by the Masterplan area. However, it is unlikely that any further such HRA assessments would be required in Zone C (Doonies).

Key mitigations to minimise disturbance, loss and fragmentation to **habitats** includes:

1. The East Tullos Burn crosses St Fittick's Park (Zone A) and is to be retained, with a partial section re-aligned in order to enable formation of development plots.
2. The proposals will also include measures to protect and enhance the local environment and biodiversity within and around areas of development through buffer zones, boundary treatments, development plot landscaping, tree and pollinator planting, and other blue-green infrastructures.
3. Importance of a Site Biodiversity Action Plan (SBAP) has been recognised to deliver 'no net loss' to biodiversity and promotion of 'nature-based solutions' in line with the SBAP.
4. Area-specific, over-arching CEMP, absorbing the AHEP CEMP for delivery of mitigation, and any follow-on compensation and enhancement – in order to capture the complexity of habitats and their intrinsic public appeal and biodiversity value in a semi-urban setting. Proposed to be delivered at the same time as, finalising the masterplan and any landscape plans.

Key mitigation measures for **Otter** are:

1. Protections and control measures implemented through a Construction Environmental Management Plan, with integral Pollution Plan.
2. Production of a Site Biodiversity Action Plan.
3. Maintenance and improvement of natural otter corridors at St Fittick's Park and East Tullos Burn.
4. Avoiding disturbance to inter-tidal habitat or coastal escarpment habitat in Zone B (Gregness), as masterplanned.
5. Provision of two artificial breeding holts, constructed to the specification in NatureScot guidance.
6. Reduction of potential disturbance caused by construction noise, soft starts will be adopted in Zones A (St Fittick's Park) and B (Gregness).
7. Wildlife friendly lighting, directed away from potential otter habitat during construction and operational phases in Zones A (St Fittick's Park) and B (Gregness)
8. Retention of otter habitat at St Fittick's including, retention of open channel, reedswamp and pools for shelter and foraging.
9. Enhancement of St Fittick's Park wetland by upstream water treatment to improve water quality, primarily by removal of suspended sediments and nutrient stripping. Water quality discharges will be better than existing.
10. Proposed potential for otter food sources (amphibian) to be re-introduced to the wetland system by direct translocation of spawn during the construction period but only after the completion of the upstream measures to improve water quality.
11. Application of regular protected species survey updates (annual survey) to maintain records of otter interest and ensure appropriate mitigation. Consultation with NatureScot should otter features requiring licensing be identified.
12. Specific mitigation measures will be proposed to encourage spread of any local Otter into Zone A, (St Fittick's Park) the St Fittick's wetlands and burn, and to ensure that any future use of the coastline at Zone B (Gregness) is not adversely affected. These measures will include:

- Retention of all key habitat capable supporting the viability of otter e.g. retention of reedbeds, retention of reedswamp for above ground couching and avoidance of potentially adverse effects on the ponds so that they may support otter prey populations. There is one culvert crossing required and this would be limited in width as far as possible with mammal ledges designed in.

- Improvements to the discharged water quality in the East Tullos Burn and wetlands and outfall
- Construction of an artificial holts in Zones A (St Fittick's Park) and B (Gregness) based on project ecologist's advice.

Key mitigations for **mobile bird species** include:

1. Avoid/minimise impacts on breeding birds – Where practical, time all groundworks, particularly tree and scrub clearance, outwith the bird breeding season. Any new disturbance to any habitats during the bird breeding season will require advance surveys to ensure that legal obligations are met. Findings and recommendations of such surveys should be fully implemented.
2. Key bird species mitigation – Red List SoCC and UK, Scottish and local BAP priorities will be adversely impacted in small numbers through displacement following development. Special measures must be included to minimise the local reduction in number, particularly in Zone C (Gregness).
3. Bat Species Protection Plan (SPP) – Commission and implement a bat SPP which delivers Black Hill Ecology Ltd 2023 Bat Report recommendations. Only one species roosting – pipistrelle, but recommended inclusion of bat boxes as part of the overall development scheme.
4. Habitat / foraging wise, mitigation and enhancement as covered in the SBAP for the development zones.
5. Write and deliver SBAPs for Zones A, B and C – Each SBAP should assimilate all principle proposed measures as well as identifying new enhancements based on updating surveys, detailed site layouts, drainage and landscaping. An Ecological Clerk of Works (EcCOW) should be appointed to ensure delivery of the SBAP during the construction phase.

A detailed **Site Biodiversity Action Plan** has been drafted and includes a range of requirements that also relate to **mobile species**, including the following:

Zone A - East Tullos Burn and Wetlands

- Upstream interventions to improve water quality reaching the wetlands to encourage submerged plants.
- Re-alignment and enhancement of the East Tullos Burn. Enhancements to include meanders, mini-floodplains and small detention basins.
- Toad introduction scheme to establish a breeding population.
- Construction of a new artificial otter holt to encourage a more regular presence.

- Management of native invasives, for example reed sweet grass, to maintain open water.

Zone B – Gregness

- Protection of the coastal heath and species – rich grassland that has naturally regenerated.
- Enhancement of the coastal habitat through removal of invading scrub.
- Supporting the Pollinator Coast Project by encouraging the spread of kidney vetch, a larval food plant for the small blue butterfly.
- Coastal grassland seed mix sowing to encourage coastal butterflies in decline e.g. grayling.
- New native tree and scrub planting (species lists included within the PPIP Landscape Framework too).

Zone C – Doonies

- Protection of the integrity of the northern ecological corridor.
- Compensatory native tree and scrub planting for loss of gorse scrub (species mixes included).
- Grassland enhancement through sowing new native species rich swards for seed eating birds, invertebrates, pollinators and hedgehogs.
- Installation of new native hedges and log-piles for hedgehogs and other fauna.
- Nestbox scheme for house sparrow, tree sparrow and starling.
- Bat box scheme to compensate for loss of non-breeding common pipistrelle roost.
- Breeding bumblebee homes/boxes.

Effects and consideration of alternatives:

Subject to the above mitigations consideration of alternative sites is not required. Nevertheless, the development site has been subject to the local development plan process which has considered alternative sites previously, and the 'Aberdeen Energy Transition Zone Feasibility Study' (February 2020) produced by Barton Wilmore/Opportunity North East and Invest Aberdeen also assessed suitably of alternative (Aberdeen-area sites). This site assessment criteria was based on:

- planning policy implications and environmental constraints,
- review of existing road infrastructure and potential new road provision/investment that could include site selection,
- to consider operational end-user requirements for land and proximity to the harbour etc; deliverability, availability, ownership, infrastructure constraints and servicing, and
- commentary received during technical workshops with key stakeholders which provided an extra level of insight on top of desktop reviews.



| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|----|--|---|---|--|
| 1. | Individual/ Wider Aberdeen City | Destroying a green space (St Fitticks Park) in a deprived area of the city. Could use the empty industrial units throughout the City instead. | <p>This consultation process relates to the Draft Masterplan and is not about the allocation or the removal of this site from the ALDP, this has been considered and decided through the LDP preparation process including Examination carried out by an independent Scottish Government reporter. The Report of Examination published in September 2022 recommended a number of additional requirements for a Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zone sites. Importantly however, the Report recommended retaining the proposals for the Energy Transition Zone at OP56 St Fittick's Park and OP61 Doonies / Gregness.</p> <p>The Council accepted all the Reporter's recommendations in December 2022 and the Aberdeen Local Development Plan was formally adopted on 19th June 2023. The principle of developing OP56 St Fittick's Park and OP61 Doonies for energy transition uses has therefore been accepted in the adopted Aberdeen Local Development Plan 2023. However, the Local Development Plan also requires a joint Masterplan for OP56 St Fittick's Park, OP61 Doonies and OP62 Aberdeen South Harbour and outlines some</p> | None |

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| | | | <p>of the issues that need to be considered within the Masterplan. It is this Masterplan which is subject to the current consultation.</p> <p>If the Masterplan is approved, any development of the sites would then require planning consent. This will require planning applications containing further detailed proposals, over and above what would be contained within a Masterplan, which in turn will be open for further public scrutiny and comment and each planning application will be considered and decided on its own merits.</p> <p>The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it.</p> | |
| 2. | Individual/ Local area | There are alternatives to building at St Fitticks, these should be used as a priority. | Per comment 1. | None |
| 3. | Individual/ Local area | Should not be getting rid of the green space in Torry when most people live in flats with no gardens. This is a safe space. | This consultation process relates to the Draft Masterplan and is not about the allocation or the removal of this site from the ALDP, this has been considered and decided through the LDP preparation process including Examination carried out by an independent Scottish Government reporter. The Report of Examination published in | None |

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| | | | <p>September 2022 recommended a number of additional requirements for a Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zone sites. Importantly however, the Report recommended retaining the proposals for the Energy Transition Zone at OP56 St Fittick's Park and OP61 Doonies / Gregness.</p> <p>The Council accepted all the Reporter's recommendations in December 2022 and the Aberdeen Local Development Plan was formally adopted on 19th June 2023. The principle of developing OP56 St Fittick's Park and OP61 Doonies for energy transition uses has therefore been accepted in the adopted Aberdeen Local Development Plan 2023. However, the Local Development Plan also requires a joint Masterplan for OP56 St Fittick's Park, OP61 Doonies and OP62 Aberdeen South Harbour and outlines some of the issues that need to be considered within the Masterplan. It is this Masterplan which is subject to the current consultation. If the Masterplan is approved, any development of the sites would then require planning consent. This will require planning applications containing further detailed proposals, over and above what would be</p> | |

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| | | | <p>contained within a Masterplan, which in turn will be open for further public scrutiny and comment and each planning application will be considered and decided on its own merits.</p> <p>The Masterplan sets principles and parameters that will be taken forward with any planning applications. Its objectives are to provide a series of strategic design and development principles to guide the most appropriate forms of development and uses for the area in accordance with the allocation.</p> <p>The masterplan shows that not all of St Fitticks park will be developed, but rather only the area immediately adjacent to the harbour equating to around 7 hectares. This area per the ALDP allocation must have a functional association with the South Harbour that precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring roll on/roll off level access to the harbour.</p> <p>The environment, connectivity and community benefits, including the</p> | |

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| | | | <p>enhancement and potential extension of the existing play, and the potential extension and enhancement of the skate park and/or pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered. The Masterplan sets out that although there will be a loss of quality of greenspace there will be an improvement in the quality and accessibility of the remaining space.</p> <p>The Community and Energy Coast chapter of the Masterplan considers the East Tullis Burn and wetlands (p59 and 60), St Fittick's Park and the projects that will be brought forward in this area, to the benefit of the community, are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping.</p> <p>The Energy Transition Zones are to bridge the transition from one industry to another and due to its strategic location adjacent to the South Harbour, OP56 is a keystone to</p> | |

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| | | | this and potential catalyst for wider economic and environmental change. | |
| 4. | Individual/ Local area | <p>Destroying the park means that the only healthy green space left in a deprived area is to be build on under the guise of saving the planet.</p> <p>This could all be done on brownfield land nearby.</p> | Per comment 3 | None |
| 5. | Individual/ Local area | <p>Essential consideration is the suitability of the road network both during and on completion of the areas.</p> <p>Also of note is the Road/W Tullos Road/Wellington Road roundabout it is already a difficult pinch point at peak times.</p> | <p>This level of detail is not required at Masterplanning stage. An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward.</p> <p>The requirement for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue(p84, p108, p122, p123, p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the Aberdeen South Harbour Link Road.</p> | None |
| 6. | Individual/ Wider | Object to development on the coastline for industrial uses. | This consultation process relates to the Draft Masterplan and is not about the allocation or the removal of this site, this consideration | None |

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| | Aberdeen City | Industry and waste disposal should be in outlying areas and coastline should be development for walks and tourists. | <p>has taken place and been decided though the LDP and at an Examination carried out by an independent reporter. The reporter issued a Report into the Examination in September 2022. The Report recommended a number of additional requirements for a Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zones. Importantly however, the Report recommended retaining the proposals for Energy Transition Zones at OP56 St Fittick's Park and OP61 Doonies. The Council accepted all of the Reporter's recommendations in December 2022 and the Aberdeen Local Development Plan was formally adopted on 19th June 2023.</p> <p>The ALDP allocation for OP56 St Fittick's Park does state "Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring 'roll on / roll off' level access to the South Harbour."</p> <p>The waste disposal (WWTP) is an existing use in this area.</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 7. | Individual/ Local area | St Fitticks is the only greenspace in Torry it is right on their doorstep outdoor use. There are more suitable places away from people so it cannot hurt people or animals. The air quality and quality of life will suffer from the proposal. | Per comment 3 Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| 8. | Individual/ Aberdeens hire | Object yet again Torry being considered as an area to take away all green spaces. | Per comment 1 | None |
| 9. | | More suitable sites that do not destroy a local amenity. | Per comment 1 | None |
| 10. | Individual/ Local area | ETZ masterplan must not go ahead. Do not see how removing an existing greenspace can be any benefit to the residents of Aberdeen, the wildlife and biodiversity. | Per comment 3 | None |
| 11. | Individual/ Local area | Object to the removal of the coast road. Object to the inclusion of greenspaces especially Doonies a huge asset to the city used by schools, nurseries and special needs children. | The coast road will not be removed, it is proposed to be realigned. Per comment 1 | None |
| 12. | Individual/ Wider Aberdeen City | Object to the allocation of Doonies and the other areas for 'energy transition.' Do not believe the social impact of this decision has been fully assessed and taken into consideration. Decision should be reversed Plenty industrial areas that can be used instead. | This consultation process relates to the Draft Masterplan and is not about the allocation or the removal of this site from the ALDP, this has been considered and decided through the LDP preparation process including Examination carried out by an independent Scottish Government reporter. The Report of Examination published in September 2022 recommended a number of | None |

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| | | | <p>additional requirements for a Joint Masterplan for Aberdeen South Harbour and the Energy Transition Zone sites. Importantly however, the Report recommended retaining the proposals for the Energy Transition Zone at OP56 St Fittick's Park and OP61 Doonies / Gregness.</p> <p>The Council accepted all the Reporter's recommendations in December 2022 and the Aberdeen Local Development Plan was formally adopted on 19th June 2023.</p> <p>The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout the masterplan states that brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses.</p> | |
| 13. | Individual/ Local area | Fully in support of transition away from fossil fuels but the proposals are problematic. Not a just transition for the people of Torry. Want the green spaces retained. | Per comment 1 | None |
| 14. | Individual/ Local area | No reason to use green space where there is so much vacant industrial land. Return Gregness back and St Fitticks as promised. | Per comment 12 | None |
| 15. | Individual/ Wider | Object to use of greenspace when the city is full of Brownfield land. | Per comment 12 | None |

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| | Aberdeen City | | | |
| 16. | Individual/ Local area | <p>Object to use of greenspace when the city is full of Brownfield which could be reused.</p> <p>Harbour promised to reinstate Gregness back to Doonies farm and St fitticks park back to the people of Torry but this did not happen.</p> <p>Concern with noises and smells a short distance from residences.</p> | <p>Per comment 12</p> <p>The requirement to reinstate the land by Aberdeen Harbour Board does not relate to this Masterplan.</p> <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> | None |
| 17. | Individual/ Local area | Waste of money, time and effort. | Comments noted | None |
| 18. | Individual/ Aberdeens hire | Object to the allocations on greenspaces. Object to the loss of Doonies particularly for the poorer areas. | Per comment 1 | None |
| 19. | Individual/ Local area | <p>Object to the loss of the last accessible green space from the community, loss of nature reserve and animals.</p> <p>Reuse vacant lots at Altens instead.</p> | Per comment 12 | None |
| 20. | Individual/ Local area | <p>Object to the loss of another green space.</p> <p>Concern for further health issues as a result of the development.</p> | <p>Per comment 3</p> <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the</p> | None |

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| | | | different areas are unknown so cannot be assessed at this time. | |
| 21. | Individual/ Aberdeens hire | Object to the loss of St Fitticks /Greenspace to the detriment of the detriment of the local population and nature, planet and people come last. | Per comment 3 | None |
| 22. | Individual/ Wider Aberdeen City | Object to the use of accessible greenspace from the poorest community when there is Brownfield land. | Per comment 12 | None |
| 23. | Individual/ Local area | Object to the use of St Fitticks Greenspace for development -, greenspaces are important for health. Area surrounded by industrial estates, an incinerator, a new harbour and a landfill site that is still polluting the areas of Aberdeen. Use brownfield sites in Tullos and Altens instead. | Per comment 12 | None |
| 24. | Individual/ Other former resident | Object to more development in Torry. The incinerator causes air pollution. The closure of the Academy destroyed the community. | The sites are allocated within the local development plan as set out under comment 1. Concerns with existing air pollution should be raised with the Council's Environmental Health Service. Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |

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| 25. | Individual/ Wider Aberdeen | Object to the ETZ detriment of a city. | Per comment 1 | None |
| 26. | Individual/ Local area | Object to the use of Green spaces, very few green spaces left in Torry this will harm the community and environment. | Per comment 3 | None |
| 27. | Individual/ Wider Aberdeen | Object where masterplan states it was not informed by community feedback, they are opposed to the proposals. Community were not a stakeholder. | Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan (and summarised within this report). The main concerns raised by the community during consultation related to the allocation of the sites at St Fittick's and Doonies rather than community requirements or benefits. | None |
| | | Community benefits – concern for: No apparent funding for proposed; No planning condition / condition of occupation proposed; Lack of enforcement of the ASH s69; and, Agreed community benefits, must be developed. Requested explanation of mitigation hierarchy. | The masterplan sets out phasing of applications and linked Strategic Mitigation & Compensation Measures (identified through Masterplan) on pages 158-172 of the draft Masterplan. It also states that planning obligations will be agreed with ACC through planning application assessment and as such will be secured through planning conditions and/or a legal agreement. | None |
| | | Concern for the loss of amenity (views/boundary treatment/light/24 hour operative site) to the existing park. | Detailed design and further assessments submitted with planning applications will consider the potential impact of elements such as light. This document sets out parameters and a framework for detailed proposals, but the design detail will be | None |

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| | | | determined through the planning application process. | |
| | | <p>Comments re St Fittick's park (' the Park')</p> <p>Note development of a part of the Park such to conditions which include that development must have a ' functional association with ASH which precludes it being located elsewhere '</p> | A new section will be added to the Masterplan to make it clear the LDP requirement of each allocation. | Amend masterplan to ensure it is clear the LDP requirement including the functional association with ASH. |
| | | Concern for the height limitations (up to 15 meters) of development for the park 2 and no justification for impact to visual amenity. | The Masterplan sets parameters for development. Detail of building heights will be set out in subsequent planning applications. via studies such as Landscape and Visual Impact Assessments. | None |
| | | <p>Concern realignment of the Coast Road would increase the land and allow land to be used for other purposes and should not be permitted.</p> <p>The section of land which will be enclosed is land which AHB had refused permission to use when ASH was constructed. The land was to be reinstated when construction concluded.</p> | <p>The level of detail required at Masterplanning stage does not include detailed assessments for topics like roads. An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward.</p> <p>The requirement for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue(p84, p108, p122, p123, p144).</p> | None |

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| | | | <p>Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the coast road.</p> <p>The requirement to reinstate the land by Aberdeen Harbour Board does not relate to this Masterplan.</p> | |
| | | Concern no meaningful screening is proposed, in particular loss of tress. | <p>The Masterplan illustrates the location and area of landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood. A section has also been added to the Masterplan stating: “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover”</p> <p>Screening will be considered in more detail as part of the planning application process.</p> | None |
| | | The practicality of realigning the East Tullos Burn remains unclear. Detailed engineering/ hydrological drawings should be required to demonstrate feasibility. | Noted. The Masterplan makes it clear that further studies, design and assessments are required as part of any planning application to fully consider the details of this. | None |
| | | The masterplan omits the damage to the remaining two thirds of the park which will now be bordered by a fenced , possible floodlit, etc this must be a condition. | Detailed design and further assessments submitted with planning applications will consider the potential impact of elements | None |

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| | | | such as light. This document sets out parameters and a framework for detailed proposals, but the design detail will be determined through the planning application process. | |
| | | <p>Mitigation</p> <p>Concern no funding/costing information provided or, details of proposed construction.</p> | It is not appropriate to go into such detail at the Masterplan Stage of the process. Funding / costing are not material planning considerations. | None |
| | | The Masterplan shows a range of footpaths (dotted white). Note, the path South of the railway will soon be inaccessible given proposals by Network Rail to shut the footbridge. ETZ need to specify which paths will be 'maintained and enhanced'. Note that no new paths are proposed in the upper area of the Burn near the school. Completion of path should be a condition of occupation of any industrial buildings. | The removal of the bridge is outwith the control of ETZ but they have considered connections beyond the site. The plan on page 71 shows how the connections can be made via an underpass to the west. This said in section 6 it would be helpful to have a plan showing the indicative path improvements within the sites and the wider connections to the network beyond. It should be noted that at this time the final path locations have not been determined and this would be part of a planning application process, but the requirement for their retention and enhancement has been identified. | Add wider context plan for the sites showing potential path links to the wider network ensuring connectivity to the City Centre, the surrounding communities and the coast. |
| | | The planning conditions should specify detail of what is to be done re enhancing Tullos Wood access, where etc. | This will be considered through the planning application process. | None |
| | | Concern pocket parks and areas of green space in the wider Torry community are no longer proposed. | Pages 95 and 96 of the Masterplan show Local Parklets and it states that specific locations and amenities within parklets to be | Add note here after with ACC to include “and |

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| | | | confirmed through further consultation and in coordination with ACC. | the relevant community interest groups” |
| | | Compensatory off-site planting provides no benefit to the community but can be used as screening. Support adherence to Tree Replacement Plan. | A detailed landscape plan will be developed as part of any planning application including native species. A section has also been added to the Masterplan stating: “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover” | None |
| | | Gregness Object to the proposed buildings height on grounds of impact visual amenity. | The Masterplan sets parameters for development. Detail of building heights will be set out in subsequent planning applications. via studies such as Landscape and Visual Impact Assessments. | None |
| | | Concern no mitigations proposed for loss of this public open space as part of the S69 ASH agreement. | The requirement to reinstate the land by Aberdeen Harbour Board does not relate to this Masterplan. | None |
| 28. | Individual/ Local area | Suggest reuse and reinvigorate existing industrial areas and brown land. | The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout the masterplan states that brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses. | None |

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| | | Object to inclusions of St Fitticks park it is invaluable. | Per comment 1 | None |
| 29. | Individual/ Wider Aberdeen | Object to the plans to develop community areas. | Per comment 1 | None |
| | | Object to the loss of Doonies farm it educates children. | Per comment 1 | None |
| 30. | Individual/ Wider Aberdeen | Support the move towards renewable energy but not at the expense of well used green spaces. Reuse derelict industrial areas instead. | Per comment 1 The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. | None |
| 31. | Individual/ Local area | Concern with loss of 2/3 of the trees from St Fitticks. Need to retain the greenspace because adjacent houses don't have gardens. Use Brownfield land instead of building on the park. | Allocation of site per comment 1 The Masterplan illustrates the location and area of landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood. A section has also been added to the Masterplan stating: "development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover" The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout the masterplan states that | None |

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| | | | brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses. | |
| 32. | Individual/ Other | Retain the green space for mental and physical wellbeing. Concern with the development that have impacted Torry over the recent years. | Per comment 3 | None |
| 33. | Individual/ Local area | The ETZ is, in principle a good concept. Object that the plan starts by concreting up a wetland in the most deprived area of Aberdeen. | <p>At the centre of the ETZ masterplan is the consideration of environment, biodiversity and landscape. The community and energy coast considers the East Tullos Burn and wetlands (p59 and 60). St Fittick's park and the projects that will be brought forward in this area, to the benefit of the community are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping.</p> <p>It is acknowledged that around 1/3 of the site will be built on and alterations will be made to the burn at its easterly end but a number of further studies and assessments, including an EIA and flood risk assessment are required as part of ongoing planning processes and will be fully assessed and considered through this route.</p> | None |

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| | | | <p>The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, connectivity and community benefits, including a new play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.</p> <p>Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan for clarity and the HRA available for the Councils website.</p> | |
| 34. | Individual/ Wider Aberdeen | <p>Strongly opposed to the Draft ETZ Masterplan. St Fitticks park very important and valuable greenspace with many benefits. Torry has suffered more than its fair share of industrial development. Cannot encroach further.</p> <p>Sufficient Brownfield land could be used instead.</p> | <p>Per comment 3</p> <p>The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land.</p> | None |
| | | Concern with the governance process in relation to the ETZ and want decision made by Full Council. | A decision was taken at PDMC to consider the Masterplan at Council, hence this report. | None |

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| | | | The governance process is not a matter for consideration within this report or masterplan. | |
| 35. | Individual/ Local area | Concern with black particles in the air already the atmospheric pollution will get worse with this project. | Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| 36. | Individual/ Local area | Concern that Doonies has closed and that the green space is being removed. | Per comment 1. The closure of Doonies Farm is not for consideration in this Masterplan or report. | None |
| 37. | Individual/ other – born in area | Object to development on St Fitticks park. Concern that once this is over the park will not be restored to its current states. | Per comment 1. Part of St Fittick's Park will be lost to development under current plans. The remaining areas will be maintained and enhanced. | None |
| 38. | Individual/ Aberdeens hire | Concern with the inclusion of St Fitticks park in the ETZ. The site is in part a boggy wetland, not very accessible and not suitable for development; it will severely impact an already disadvantaged community. Reuse brownfield land adjacent to the South Harbour instead. | Per comment 12 The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout the masterplan states that brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses | None |
| 39. | Individual/ Local area | Community needs St Fitticks park it is the only natural resource near our doorstep. | Per comment 3 | None |

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| 40. | Individual/ Local area | Concern with existing pollution in Torry. Loss of St Fitticks would cause decline in mental health, it is a well used area. | The sites are allocated within the local development plan as set out under comment 2. Concerns of existing air pollution should be raised with environmental health. Assessments will be required with planning applications that will take into consideration, air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| 41. | Individual/ Local area | Masterplan should be considered by Full Council. | This report is for Council | None |
| 42. | Individual/ Local area | Reuse Brownfield land in Altens and Tullos industrial estates instead. Concern with the loss of the green space. Concern from air pollution from HGVs and machinery. | The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. | None |
| | | Masterplan should be considered by Full Council. | This report is for Council | None |
| 43. | Individual/ Local area | Object to the loss of Torrys only expansive green space when the provision is already limited. | Per comment 3 | None |
| 44. | Individual/ Wider Aberdeen | Concern that Torry has already had many industrial developments imposed upon it. Should support green business and not fossil fuel industry, retrofit homes and instal insulation. | The existing situation in Torry or retrofitting of homes with insulation are not for this Masterplan to consider. The ETZ vision states: “ By 2030 we will have designed and built in phases a unique Energy Transition Zone adjacent to the new harbour development at | None |

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| | | | Aberdeen South Harbour. It will be a leading-edge catalyst for innovation and high value manufacturing, and a centre of excellence for offshore renewables, large scale production of hydrogen and CO2 storage. Through the success of the ETZ, the region and the energy supply chain will become a global leader in energy transition, and a net exporter of product, services, technologies, and skills. This purpose-built net zero green space, connected to the coastline, will provide future Energy Transition organisations and the local community with amenities, job opportunities, a strong blue-green network supporting a long term business environmentally sustainable business cluster; harnessing the region's natural resources and existing skills base to maximise the future value potential from Energy Transition developments for future generations." Thus moving away from the Oil and Gas. | |
| 45. | Business/ Fridays for Future Aberdeen/ Wider Aberdeen | 1. Object and want Opportunity Sites 56 and 62 in St Fittick's Park removed from the ETZ and amend the draft Masterplan accordingly. The proposed development of Opportunity Sites 56 and 62 will negatively impact environmental health experienced by a | 1. Per Comment 1 2.The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>community which already has significant health outcome disparities.</p> <p>Will negatively impact the natural environment will have a negative impact on the amenity of the surrounding residential area</p> <p>2. Will be contrary to current national and local authority planning policy including Scotland's NPF4 and Aberdeen Local Development Plan 2023</p> <p>3. will cause traffic congestion, access, and safety problems for residents and those using coast paths due to increased HGV and other vehicular traffic related to uses. Potential conflicts with pedestrians, cyclists and public transportation</p> <p>4. will create a precedent for future similar proposals in Torry,</p> <p>5. will adversely impact a Scheduled National Monument and Commonwealth War Grave site of St Fittick's Church</p> <p>6. result in the loss of public amenities, such as green space and recreational grounds cannot compensate for the loss</p> <p>7. Proposed improved access to Tullos Wood is not suitable compensation as this requires lengthy pedestrian travel through an industrial estate.</p> <p>will adversely affect the needs of people with disabilities due to the loss and diminution of quality of accessible and inclusive</p> | <p>improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation.</p> <p>3. Concerns of traffic and road congestion conflicts will all be considered as part of required assessments submitted with any planning application. The Masterplan sets out on page 167 the further assessments that are required for planning applications including an EIA, HIA and TIA.</p> <p>4. The issue of precedent does not exist, every application is considered on its own merits. The sites are allocated in the ALDP and will be assessed against the requirements of this and other relevant legislation and other material planning considerations.</p> <p>5. Consideration has been given to the siting of the development beside St Fittick's Church and Historic Environment Scotland and the Council's archaeologist have been involved throughout the process. Further</p> | |

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| | | <p>existing pathways in the park. he proposed mitigation and compensation will not meet the needs of elderly and disabled residents of Brimmond Court.</p> <p>8. Proposed local parklets do not provide for the same range of uses as the existing park.</p> <p>9. will impose additional pollution on top of those already present</p> | <p>Assessments and consultation with HES will be required as part of the planning process.</p> <p>6. The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).</p> <p>7. The proposal includes improved access through St Fittick's Park to Tullos Hill. It is noted that the bridge will be removed but this is a consequence of a separate project to electrify the main east coast rail line and upgrade the Coast Road and is consequently under the control of Network Rail. Careful consideration will be given to allowing improved access for all through the assessment of planning applications. Further path networks and improvements are shown for each area but in particular on the Marine Gateway. Though part of the site</p> | |

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| | | | <p>will be developed, there will be an extensive path network still available.</p> <p>8. The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, connectivity and community benefits, including a new play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.</p> <p>9. Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> | |
| 46. | Individual/ Wider Aberdeen | Comments same as 45 above. | Response per 45 above. | none |
| 47. | Individual/ Wider Aberdeen | <p>Object to the proposed development which is contrary to key policies within Scotland's National Planning Framework 4 regarding nature recovery and human wellbeing.</p> <p>Development will destroy plants and animal habitats as well as large areas of woodland and grassland.</p> | <p>The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment,</p> | None |

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| | | <p>Proposed compensatory tree planting at Tullos Wood is insufficient.</p> | <p>safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation.</p> <p>The masterplan has identified the developable area within the site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60). Further assessments such as an EIA are required with any planning application.</p> <p>The Masterplan illustrates the location and area of landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood. A section has also been added to the Masterplan stating: “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover”</p> | |

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| | | <p>Concern that Balnagask residents already live with unhealthy levels of air pollution which would deteriorate further.</p> <p>Concern that some proposal ie pump park would expose young users to high levels of pollution.</p> <p>Concern would cause a reduction in opportunities for healthy outdoor activity.</p> <p>Insufficient compensatory greenspace proposed</p> | <p>Concerns of existing air pollution should be raised with environmental health.</p> <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> <p>A Health Impact Assessment will be provided as part of the planning application process.</p> <p>The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60). The proposal looks at quality as well as quantity.</p> | None |
| 48. | Individual/ Local area | <p>Concern children will be exposed to more pollution,</p> <p>Object as a community for this ETZ to go ahead.</p> | Per comment 1. Assessments (including a health impact assessment) will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final | None |

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| | | | uses of the different areas are unknown so cannot be assessed at this time. | |
| 49. | Individual/ Local area | Not in my backyard please | No response | None |
| 50. | Local area | Object to all the plans | Per comment 1 | None |
| 51. | Individual/ Local area | Concern that the loss of St Fitticks would have a detrimental effect on the community and wildlife. Concern with increase pollution in the area which will impact on animals that do survive. | Per comment 2 Assessments (including a health impact assessment) will be required with planning applications that will take into consideration, air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| | | Support that new children's facilities included however within an industrial estate seems inappropriate. | Assessments (including a health impact assessment) will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| | | Object to the forced closure of Doonies farm | The closure of Doonies is not for consideration in this Masterplan or report, | None |
| | | The current 'masterplan' does not seem to listen to the voices of local residents or the community. | Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. The main concerns raised by the community during consultation related to the allocation of the sites at St Fitticks and Doonies rather than community | None |

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| | | | requirements or benefits. The allocation of the site is not for this Masterplan to consider, this was carried out via the Local Development Plan process (per comment 1) | |
| 52. | Individual/ Wider Aberdeen | Object to the rezoning of the park due to an undemocratic process and lack of meaningful community consultation. | Per comment 1. | None |
| | | Concern for the negative impacts from the proposed development, namely the health of the community. Highlights "economic wellbeing" is not suitable compensation. | Assessments will be required with planning applications that will take into consideration, air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| | | Object to any development on St Fitticks it is not 1/3 being developed but further creep into the green lung. | Per comment 3 | None |
| | | Global issues cannot simply be used to justify local injustices not in the community's best interest. | Per comment 3 | None |
| 53. | Individual/ Local area | Object to the rezoning of this vital green space for industrial use. | Per comment 1 | None |
| | | Object to further noise and dust that will be produced as a result of the development. | Assessments (including a health impact assessment) will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| | | Object to living beside St Fittick's if it's an industrial zone Torry is already bordered by industrial uses and incinerator that cause noise and air pollution. | Per comment 1 | None |

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| | | | The existing uses within the area are not for consideration within this report, that is an existing situation. | |
| | | Object to the impact on the important wetlands round the Tullos Burn, destroying their habitat will result in the loss of our wildlife. | Per comment 1. At the centre of the ETZ masterplan is the consideration of environment, biodiversity and landscape. The community and energy coast considers the East Tullos Burn and wetlands (p59 and 60). St Fittick's park and the projects that will be brought forward in this area, to the benefit of the community are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping. It is acknowledged that around 1/3 of the site will be built on and alterations will be made to the burn at its easterly end but a number of further studies and assessments, including an EIA and flood risk assessment are required as part of ongoing planning processes and will be fully assessed and considered through this route. Further detail on the burn and the wetlands will be developed via the planning application process. This will include biodiversity/ landscape framework and ecological surveys. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan for clarity and the HRA available for the Councils website. | |
| 54. | Individual/ Local area/ | Object to the green hydrogen but if it is that important to make hydrogen there is so many empty industrial buildings Do not build on St Fittick park and Donnies Farm. | Per comment 1 The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. | None |
| 55. | Individual/ ocal area | Object to inclusion of the Green space should be left alone for Residents of Torry | Per comment 1 | None |
| 56. | Individual/ Aberdeens hire | Object to inclusion of the Green space should be left alone for Residents of Torry | Per comment 1 | None |
| 57. | Individual/ Local area | The masterplan should be decided by full council and not planning committee. | This report is for Council. | None |
| 58. | Individual/ Local area | Object to inclusion of St Fitticks Park, it is the only play area this side of Torry .it is well used by all in Torry. | Per comment 3 | None |
| 59. | Individual/ Local area | Object to the inclusion of St Fitticks and Doonies in the ETZ. Concern Torry is becoming overdeveloped at the cost of loss of open greenspace. | Per comment 1 | None |

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| | | Seeks clarity that St Fitticks Park was a Council initiative. Highlights the bigger "green" agenda must take precedence over the one remaining green space in Torry. | Per comment 3 | None |
| 60. | Individual/ Aberdeens hire | Object to loss of Doonies Farm it should never have been forced to close. | Per comment 1 | None |
| 61. | Individual/ Local area | Object – the park and doonies farm they are well used and should be kept. | Per comment 1 | None |
| 62. | Business/ Individual/ Peterson UK LTD | Fully Supportive of the Masterplan and its objectives. The ETZ should be set up to maximise the skills and expertise of the supply chain in order to make the Offshore Renewables activity as efficient and effective as possible. Must ensure the vendor community is as attractive as possible for investment and activity is not lost to other parts of the UK or worse to the rest of Europe. The ETZ has a once in a generation opportunity to set out its stall and become a best in class vendor community. This will not only support the energy transition of jobs from Oil and Gas to Renewables, but also create new jobs of the future and provide an exciting prospect for the next generation of talent who are not motivated to be involved in Oil & Gas. | Support Noted | None |
| 63. | Individual/ Local area | Object to St Fittick's park to be included in the ETZ - it is not needed. Concern it is only to absorb activities from the old north harbour. Object to further industrialisation of Torry. | Per comment 1. | None |

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| | | The consultation was information giving with no opportunity for residents to have any influence on the plan. | This consultation period that this report relates was a time to provide comment to the Council on the content of the document. | None |
| | | Object to a 50ft factory making anchor chains located 50m from housing. As the landowner, ACC has betrayed its duties to Torry Community by allowing this development to take place. | The Masterplan sets parameters for development. Further detail of building heights and uses will be set out in subsequent planning applications via studies such as Landscape and Visual Impact Assessment, Noise Impact Assessment dependant on the use proposed. The Masterplan sets out a framework for development, a significant level of work and further information is required through the planning application process before development can begin. | None |
| | | Concern that the proposed scale and type of development will not sufficiently protect the local amenity on existing homes (p78) certainly, the protection measures within the 2020 AHB Plan are not sufficient. | Landscape plans and mitigation will be considered in detail as part of a planning application. Also per comment above surveys and assessments will also be required. | None |
| 64. | Business/ River Dee Medical Group | The board and staff of River Dee Medical Group support the aims of an Energy Transition Zone to develop new renewable technologies using existing brownfield sites. | Noted | None |
| | | We object to any industrial development of greenspace in the St Fittick's Park area (OP56). This is a public health asset. | Assessments will be required with planning applications that will take into consideration, air quality, odours, and a health impact assessment. The specific final uses of the | Text added to Masterplan to confirm that a |

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| | | <p>No evidence that development of the St Fittick's Park is essential to a successful energy transition programme.</p> <p>Further industrialisation will exacerbate the already poor health outcomes within the community.</p> <p>No health impact assessment has been undertaken in the nor been asked by Aberdeen City Council to do so.</p> | <p>different areas are unknown so cannot be assessed at this time.</p> <p>A Health Impact Assessment will be provided as part of the planning application process.</p> | HIA is required. |
| 65. | Individual/ Local area | Strongly object to development at St Fitticks Park. Use empty buildings in Altens instead. Loss of greenspace is contrary to the Masterplan of Aberdeen. | <p>Per comment 1</p> <p>Assume the masterplan of Aberdeen is the LDP and the site is allocated within this document.</p> | None |
| 66. | Individual/ Local area | <p>Masterplan should be considered at full council.</p> <p>Object to this masterplan and the pollution it will generate.</p> <p>Object to impact on St Fitticks church and the graveyard.</p> | <p>The masterplan will be considered at Full Council.</p> <p>The impact on St Fitticks Church and Graveyard has been considered. Additional surveys and assessments will be required to ensure no physical damage is caused during development the setting of the church was altered a number of years ago.</p> | None |
| 67. | Individual/ Local area | <p>Object to the loss of the Torry golf course and Doonies farm.</p> <p>Full council should consider the document.</p> | <p>There is no proposal to carry out any work at the golf course.</p> <p>OP61 Doonies is within the Aberdeen Local Development Plan which was formally adopted on 19th June 2023.</p> | None |

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| | | | This report is for Council. | |
| 68. | Business / Paths for all | Welcome the links to the place principle and net zero priorities and the delivery of 20 minute neighbourhoods policies embedded in NPF4. Welcome the compliance with specific policy requirements including sustainable places and liveable places. | Support noted | None |
| | | Welcomes reference to NPF4 six qualities of successful places | Support noted | None |
| | | Agree that development within the Masterplan should: <ul style="list-style-type: none"> • Be focused on key transport and movement corridors that are accessible and have potential for multi-modal connectivity. • Incorporate active travel connections and infrastructure. • Support local living and the strengthening of 20-minute neighbourhoods. | Support noted | None |
| | | Opportunity should be taken to enhance greenspace and encourage active use. | Support noted | None |
| | | Supports investing to enhance the path/cycleway network. | Support noted | None |
| | | Supports active travel interventions and the creation of 20-minute neighbourhoods and liveable places. | Support noted | None |
| | | Supports the principle of a Community Fund. | Support noted | None |
| | | Supports creating safe and attractive routes for walking and cycling across the area. | Support noted | None |
| | | Our strategy sets out our vision for tackling physical inactivity, poor mental health, increased health and transport inequalities and the climate emergency. | Support noted | None |
| 69. | Individual/ Wider City | Objects to the Draft ETZ Masterplan. Supports transition but must ensure social justice & environmental protection. | The masterplan has identified the developable area within the site, which is note the whole of the site and equates to | None |

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| | | <p>The plans will destroy a large part of St Fittick's Park - unacceptable.</p> <p>Loss of much of St Fittick's Park will affect residents' physical & mental health which is already poorer.</p> | <p>around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).</p> <p>It is acknowledged that around 1/3 of the site will be built on and alterations will be made to the burn at its easterly end but a number of further studies and assessments, including an EIA and flood risk assessment are required as part of ongoing planning processes and will be fully assessed and considered through this route.</p> <p>The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, connectivity and community benefits, including a new play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.</p> | |

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| | | Object to the damage to the wetlands and the fact that the remaining undeveloped space will be too close to an industrial park. | The sites are allocated in the Local Development Plan as set out in comment 1. Page 59 and 60 of the Masterplan sets out what is proposed and it states that “further detailed design and feasibility must be informed by further development of baseline information around baseline information around water quality, technical appraisal of existing hydrology and water flow through the burn, and review of channel length, dimensions and capacities to ensure that any amendment to these elements addresses existing issues and enhances the Burn’s hydrological and biodiversity function work will be required in relation to the wetlands” | None |
| | | <p>The ETZ proposals are inconsistent with Scottish Government policy which is to prioritise wellbeing & nature recovery.</p> <p>The proposals set an extremely bad precedent</p> <p>Local people have made their objection to loss of St Fitticks clear.</p> | The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation. | None |

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| | | | The issue of precedent does not exist, every application is considered on its own merits. The sites are allocated in the ALDP and will be assessed against the requirements of this and other relevant legislation and material planning considerations. Per comment 1 | |
| 70. | Individual/ Wider Scotland | Object to the construction as it will destroy our land. Do not allow yet another industrial park. We need to put people first. | Per comment 1 | None |
| 71. | Individual/ Local Resident | Not against the development of an ETZ, just should not be built at St.Fitticks Park. Use brownfield industrial land instead. | The site is allocation with the LDP for development. The ETZ proposal also includes building on brownfield land at Altens. | None |
| 72. | Business/ Wider Aberdeen/ CBRA | With the shift in focus from oil and gas to more greener forms of energy there is significant potential for the North East to be at the forefront of this new green revolution, and the proposals for Energy Transition Zone will help create the right working environment to embrace this new energy world we are entering in to. Critical that Aberdeen and the Energy Transition Zone progress these plans to provide a credible proposition for these organizations to set up a base in the North East. We therefore fully support this masterplan. | Comment noted, support welcomed | None |

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| 73. | Individual/ Local Area | Object to development at Fitticks Park and the wetlands, not appropriate for heavy industry. No guarantee jobs will be given to local people. Nothing will compensate for the loss of green space. | Per comment 3 At the heart of the ETZ masterplan is growth, investment and jobs. The skills campus is set out on pages 137-148 of the masterplan | None |
| 74. | Individual/ Work locally | Strongly oppose plans, it will destroy a lovely place. Retain greenery. | Per comment 3 | None |
| 75. | Individual/ Local Area | Objects to inclusion of St Fittick's Park and its unique habitats. Further industrialisation of the park will cause irrevocable damage. Park is already eroded by the new harbour and views lost. Unjust to industrialise this area further considering presence of existing Sewage Treatment works and incinerator. Supports the need for an energy transition, but must be a Just Transition that ensures those most affected are central to decision-making. | Per comment 3 | None |
| | | The consultation process carried out by ETZ Ltd and Ironside Farrar has been insufficient. The masterplan omits detail regarding job creation. | Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. There is a section of the masterplan dedicated to a skills campus and the aim to provide leading- edge education and training infrastructure that can support and enhance the local skills base in Aberdeen. | None |

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| | | Questions the requirement for additional space, given that projected construction of offshore windfarms will be reduced post 2025, thus the sites are not needed. | It is not for the Masterplan to question the need for sites. | None |
| | | <p>Suggestion that there will be ‘no net loss of biodiversity’ is ineffective if an area of greenspace is destroyed and merely placed elsewhere. Additionally, land has already been lost in the area so ‘no net loss’ is untrue. Creating biodiverse habitats to offset loss is costly, and may result in further biodiversity loss overtime if local authority cannot afford its maintenance.</p> <p>Language used in masterplan regarding compensation of biodiversity loss is ambiguous and causes uncertainty. Such as quotations: “Areas within the masterplan with potential for enhancement to contribute to the area’s biodiversity and habitat connectivity”, and “coastal cliff-tops where there is amenity grassland that could be purposefully managed for biodiversity.”</p> <p>Detail regarding what the land in St Fitticks Park will be used for is too ambiguous.</p> <p>It would be reckless for councillors to support destruction of St Fitticks’ highly valued greenspace, risks a costly legal challenge.</p> | <p>Per comment 3 – the site is allocated in the ALDP.</p> <p>At the centre of the ETZ masterplan is the consideration of environment, biodiversity and landscape. The community and energy coast considers the East Tullos Burn and wetlands (p59 and 60). St Fittick’s park and the projects that will be brought forward in this area, to the benefit of the community are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping.</p> <p>It is acknowledged that around 1/3 of the site will be built on and alterations will be made to the burn at its easterly end but a number of further studies and assessments, including an EIA and flood risk assessment are required as part of ongoing planning processes and will be fully assessed and considered through this route.</p> | None |

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| | | | <p>The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, connectivity and community benefits, including a new play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.</p> <p>Furthermore, ACC carried out a Habitat Regulation Appraisal which considers the masterplan proposals against the Special Areas of Conservation and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan for clarity and the HRA available for the Councils website.</p> <p>At this time the end user is not known for the area. It is entirely appropriate for a Masterplan to provide this level of detail. The Masterplan sets principles and parameters that will be taken forward with any planning applications.</p> | |
| 76. | Business/ Torry | Plan is good but location is wrong. Locals views are not being considered holistically. | Per comment 1. | None |

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| | Medical Practice | No health impact assessment has been undertaken. | A Health Impact Assessment will be provided as part of the planning application process. | |
| 77. | Individual/ Wider Aberdeen/ Ferryhill | Use empty industrial sites instead. Unclear why an energy transition zone required. This is a significantly deprived area any just transition should take these factors into account. | The ETZ Masterplan includes a number of proposals for Brownfield sites. This however does not remove the requirement for the land at St Fitticks which is allocated for this use. | None |
| | | Object to inclusion of St Fitticks Park an important wetland linked to the East Tullos Burn. Health inequality is significantly different across Aberdeen, removing green areas will have a further detrimental effect on health. | Per comment 3 | None |
| | | Clean Technology and Insulation are essential. More efforts needed for a transition that supports Climate Change mitigation/adaptation and Aberdeen's economy (job creation for locals). Concern ETZ masterplan is deficient in promoting a genuine, just transition. | At the centre of ETZ is the principles of adapting to climate change and job creation and upskilling. | |
| 78. | Individual/ Aberdeens hire | Object to the inclusion of St. Fitticks Park this park is vital for health and wellbeing. | Per comment 3 | |
| 79. | Individual/ Local Area | Against proposal for St Fitticks and Tullos Burn. It is a perfect carbon sink, home of hundreds of wildlife. Building over it in the name of green energy is not acceptable. Space can be found in the Tullos Industrial Estate. | Per comment 3 The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. | |
| | | The Tullos burn was part funded by the community and we don't want 2/3rds of the park we want it all. | Per comment 3 | None |

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| | | For energy transition but needs to be just this is environmental justice. | Noted. | None |
| | | Against taking any more space from the golf course. | There are no changes proposed to the Golf Course | |
| 80. | Individual/ Aberdeens hire | Comments per 79. | Per responses for 79. | None |
| 81. | Individual/ Local Area | Completely opposed to any development on the greenspace between Torry and the new harbour and/ or Tullos it should not be built over. Not energy transition when loss of greenspace, use old industrial areas instead. | Per comment 1 | None |
| | | Concern that if the area of harbour was insufficient, Torry will be subject to increased light, noise and air pollution due to poor planning. These spaces must be protected. | This Masterplan considers the sites allocated in the ALDP. Assessments (including a health impact assessment) will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. | None |
| 82. | Individual/ Wider City | Object to the inclusion of St Fittick's Park and Doonies Farm. These spaces are important for maintaining good mental health, residents being ignored. | Per comment 1. | None |
| | | This Masterplan will result in the most vulnerable communities suffering. Communities need outdoor space. | Per comment 3 | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 83. | Individual/ Local Area | Object to the creation of an ETZ within the parks, farmlands and green spaces of Torry. Object to the creation an industrial complex on a flood plain within St Fitticks Park. Reuse vacant brownfield sites nearby instead. The ETZ as proposed should be abandoned. | Per comment 3 The ETZ masterplan and the proposals will also use vacant and redundant buildings and sites within industrial areas. | None |
| 84. | Individual/ Visitor | Object to inclusion of St Fitticks in its entirety and the surrounding green belt. | Per comment 1 | None |
| | | Promote both St Fittick's Park and Doonie's farm as centres for wildlife education and as community assets. | This is not relevant to the masterplan. | None |
| | | Aberdeen City Council and staff should work in collaboration with others to help maintain and improve the park and its biodiversity, including the East Tullos Burn. | Per comment 3. Further work and consultation will be carried out as proposals are further developed. | None |
| 85. | Individual/ wider Aberdeen | Oppose any industrialization of green space in or around St. Fittick's Park and Tullos Burn. It is the last green space there is. Space can be found in the Tullos industrial estate. | Per comment 3 | None |
| 86. | Individual/ local area | Object to the inclusion of St Fitticks Park, it's the only park in the area and valued by the community. A different area should be found. | Per comment 3 | None |
| 87 | Individual/ Aberdeens hire | Objects to development at St. Fittick's Park and Tullos Burn. Area already acts as a carbon sink, developing on it in the interest of 'green energy' is not acceptable. Residents of Torry need the park. Restoration of the Tullos Burn was funded by the community, therefore, the community want to retain all of it, not just two thirds. Supports the energy transition, but needs assurance it is just. Objects to taking space from the golf course. | Per comment 3. There is no proposal to carry out any work at the golf course. | None |

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| 88. | Individual/ Wider Aberdeen | Against the proposed plans for St. Fittick's Park and I oppose any industrialization of green space. It full of wildlife. | Per comment 3 | None |
| 89. | Individual/ Wider Aberdeen | Oppose industrialisation of green space in or around St. Fittick's Park(last green space in Torry) and Tullos Burn. | Per comment 3 | None |
| 90. | Individual/ Local Area | Object to the inclusion of St Fittick's. Concern with loss for community and bird population. | Per comment 3 | None |
| 91. | Individual/ Local Area | Removing St Fitticks Park and Doonies from green space areas is going against green and environmental policy. Concern with lack of fairness or transparency and community ignored. | Per comment 3 Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation. The site allocation process is set out in comment 1. This document is the responses to the 8 week consultation that took place over summer by ACC Planning. The process has been transparent. | None |
| 92. | Individual/ Wider Aberdeen | Object to the plans and the impact they will have on the residents, community and history of Torry. | Per comment 3 | None |

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| 93. | Individual/ Wider Aberdeen | Object to the inclusion of St Fitticks and Doonies in the ETZ and why it has to be here. The cruise ship are met with an industrial site and solar panels, this is destroying the city. | Per comment 3 | None |
| 94. | Individual/ Local Area | Object, enough green space has been taken on the south of city. | Per comment 3. | None |
| 95. | Individual/ Wider Aberdeen | Object to any land being used at St Fittick's Park. | Per comment 1 | None |
| 96. | Individual/ Local Area | Heavily opposed to the industrialization plan in and around St. Fittick's Park and Tullos Burn and the impact on biodiversity and a way for stress relief. This would take away the little natural green that we have and around Torry. | Per comment 3 | None |
| 97. | Individual/ Aberdeens hire | Object to the destruction of green belt which removes open space, amenities and unique nature opportunities from communities. Use brown field, industrial land within the industrial estates in of Altens, Dyce and Bridge of Don instead. | Per comment 1 | None |
| 98. | Individual/ Aberdeens hire | Consultation meaningless given Doonies Farm was closed in advance of this consultation, decision was already made. Made reference to bus gates which are not part of this consultation. Proposals will deter visitors from the cruise ships with views of the city, including the sewage works. Use the brownfield sites before greenspaces. | The closure of Doonies is not for consideration in this Masterplan or report. Bus gates and cruise ships are not relevant to this masterplan. The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this | None |

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| | | | are evident in the Innovation and Skills Campuses. | |
| 99. | Individual/ Aberdeens hire | Comments will not be taken onboard, it has been decided already. | Unclear what decision is being referred to, if the allocation of the sites that process is covered under comment 1. This consultation was to feed into the Masterplan and where appropriate changes have been recommended. | None |
| 100 | Individual/ Wider Aberdeen | <p>1.Objects to the inclusion of OP56 in St Fittick's Park, suggests removal from the ETZ. Development on green space serving residential areas is contrary to national and local planning policy.</p> <p>Development will:</p> <ul style="list-style-type: none"> - Increase pollution and damage people's health, increasing health disparities already present in Torry. - Cause environmental damage through destruction of East Tullos Burn and degradation of remaining park area. - Damage amenity of surrounding residential area through loss of parkland and increase of heavy manufacturing and Cause loss of public amenities <ul style="list-style-type: none"> - Increase traffic and congestion, causing access and safety issues, and increased land conflicts among users - Creates precedent promoting future industrial development in Torry | <p>1. Per comment 3.</p> <ul style="list-style-type: none"> - A Health Impact Assessment will be required as part of the planning application process. - The burn is not being destroyed to allow for development. A need for the realignment of the Burn has been highlighted and the proposal seeks to improve the quality of the environment and accessibility. The remaining park area includes improvements to play provision and access. - Amenity - Per comment 3 - Detailed traffic modelling and assessments will be required as part of the planning application process. The issue of precedent does not exist, every application is considered on its own merits. The sites are allocated in the ALDP and will be | None |

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| | | <ul style="list-style-type: none"> - Adversely impacts a Scheduled National Monument and Commonwealth War Grave site due to the proximity of the re-routed Coast Road to the site of St Fittick's Church <p>Concern development will not compensate for losses. Specifically, proposed improved access to Tullos Wood is not suitable compensation due to distance and route.</p> <p>Proposed local parklets do not provide for the same range of uses as the existing park. Causes more sources of pollution and adversely affects people with disabilities due to the loss and disruption to accessible and inclusive pathways in the park.</p> | <p>assessed against the requirements of this and other relevant legislation and material planning considerations.</p> <ul style="list-style-type: none"> - Consideration has been given to the siting of development adjacent to St Fittick's Church and Historic Environment Scotland and the Council's archaeologist have been involved throughout the process. Further assessments and consultation with HES and the Archaeology Service will be required as part of the planning process. <p>The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> <p>Extension and enhancement of the skate park and/or pump park and parklets identified as part of the marine gateway are</p> | |

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| | | | all embedded within the document highlighting their importance and requirement to be further considered. Though there will be a loss of greenspace there will be an improvement in the quality and accessibility to it. | |
| 101 | Individual/ Local Area | Object to loss of access to greenspace for our local community. Concern with loss of wildlife. Park was well used during lockdown especially for those with no gardens. | Per comment 1 | None |
| 102. | Individual/ Local Area | Object to removal of Doonies Farm | The closure of Doonies is not for consideration in this Masterplan or report, . | None |
| 103. | Individual/ Aberdeens hire | Object to Doonies Farm being forced to shut down. - | The closure of Doonies is not for consideration in this Masterplan or report, | None |
| 104. | Individual/ Aberdeens hire | Object to the proposal at St. Fittick's Park and Tullos Burn. Supportive of energy transition. Process needs to be just. St. Fitticks Park and Tullos Burn is a carbon sink, home to varied flora and fauna. Torry residents need the whole park. Land should not be taken from the golf course. | Per comment 3. There is no proposal to carry out any work at the golf course. | None |
| 105 | Individual/ Wider Aberdeen | Object to removal of St Fitticks park to build the energy transition zone - protect our green spaces. | Per comment 3 | None |

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| 106 | Individual/ Wider Aberdeen | Object to proposal. Queries if it could be built in alternative locations such as Milltimber, Cults or Kingswells. | Per comment 1. The principle of developing OP56 St Fittick's Park and OP61 Doonies for energy transition uses has therefore been accepted in the adopted Aberdeen Local Development Plan 2023. However, the Local Development Plan also requires a joint Masterplan for OP56 St Fittick's Park, OP61 Doonies and OP62 Aberdeen South Harbour and outlines some of the issues that need to be considered within the Masterplan. It is this Masterplan which is subject to the current consultation. If the Masterplan is approved, any development of the sites would then require planning consent. This will require planning applications which in turn will be open for further public scrutiny and comment and each planning application will be considered and decided on its own merits. | None |
| 107 | Individual/ Wider Aberdeen | Object to the loss of a Doonies Farm and the community asset | The closure of Doonies is not for consideration in this Masterplan or report, | None |
| 108 | Not answered | Not answered | No response required. | None |
| 109 | Individual/ Wider Aberdeen | Object to business and industrial development on the rural coastline. | Per comment 3 | None |

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| | | Object to the development of St. Fitticks and Doonies, which are well used and necessary community initiatives needed for flat dwellers who have little green space. | | |
| 110 | Individual/ Aberdeens hire | <p>1.Supportive of Aberdeen reinventing itself as a sustainable energy capital but needs to be based on principles of sustainable development. This will ensure that economic development does not undermine communities or result in environmental degradation.</p> <p>2.Developing the site at OP56 (St Fitticks) is at odds with the principles of a Just Transition. It will have substantive negative impacts on the community of Torry who will receive very little of the benefits around the development.</p> <p>3. The development of Doonies (OP61) impacts the wider region and the generations who have enjoyed and learned about farming, sustainability and rural development.</p> <p>4.Supportive of the concept of an Energy Transition Zone. However, the proposed Master plan is flawed and undermines the principles that guide sustainable development. The Masterplan fails both a Just Transition and Sustainable Development test.</p> <p>5.The Masterplan document, minimises and fails to address, concerns around St Fitticks Community Park and Doonies Farm.</p> | <p>1.note support for sustainable energy capital but the need for economic development note to undermine communities or result in enviro degradation. The Energy Transition Zones are to bridge the transition from one industry to another and OP56, due to its location is a keystone to this and potential catalyst for wider economic and environmental change</p> <p>Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan (and summarised within this report). The main concerns raised by the community during consultation related to the allocation of the sites at St Fittick’s and Doonies rather than community requirements or benefits. There was opportunity for the community to feed into this process.</p> <p>3.per comment</p> <p>4. the sites are allocated in the ALDP for energy transition and states “ Aberdeen is ideally placed geographically to capitalise on energy transition opportunities. It also has the skills and</p> | |

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| | | <p>6.The masterplan downplays the critical set of ‘ecosystem services’ the greenspace provides. Greenspaces offer numerous health benefits and provide opportunities for physical activities and education.</p> <p>7. The Masterplan does not identify benefits provided by the local restored ecosystem and the impacts of disrupting, changing or removing these services.</p> <p>8. The Masterplan proposes the annexation of a third of the park (OP56) as a part of the ‘marine gateway’ but there is an absence of detail and balance in the plan.</p> <p>9.Proposed mitigation measures do not adequately address the concerns or impacts to a loss of 1/3 of the park:</p> <ul style="list-style-type: none"> - no consideration on how the remaining park sited by an industrial facility would degrade or eliminate many of the benefits of the greenspace. - The adjoining restored woodland that is cited for development acts as both a buffer to the wastewater treatment works and is considered one of the more rewilded parts of the site, providing an urban wilderness experience while still within the bounds of St Fitticks. Placing an industrial facility would substantially undermine these benefits, and likely remove them entirely. - The proposition for a ‘biodiversity swap’ by improving access to a restored Tullos Hill does not account for the change in different eco systems. It is not swappable. | <p>workforce to support diversification of the energy sector. Ensuring best use of these regional assets will help to safeguard the city region’s economic future. The construction of Aberdeen South Harbour creates the opportunity to accommodate location specific renewable energy transition developments that capitalise on supporting the rapid delivery of offshore developments.”</p> <p>5. the masterplan is for sites that are allocated in the ALDP. The principle of development on these sites has been established via this statutory process. The Masterplan sets principle and objectives for the development that will be further addressed and considered through any planning application process where studies and assessments are required.</p> <p>6. though the area of park and wetland has been altered the habitats and ecosystems will still be retained. The Masterplan also identifies areas for native planting, wetland habitat management and the opportunity to</p> | |

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| | | <p>- inequality by undermining local access (both in terms of distance to access, a hilly environment rather than flat ground and accessibility via the East Tullos industrial estate) and deepen inequalities for those with limited mobility or limited ability, the means to travel or families.</p> <p>10. The Masterplan needs fundamental revision to exclude the inappropriate development of critical community green infrastructure.</p> <p>The current plan fails at one of the key pillars of a Just Transition. The decarbonisation agenda cannot be progressed in isolation from biodiversity conservation or social justice. A Just Transition demands maximisation of all three underlying principles, and in progressing to Net Zero we do not impose unnecessary impacts on communities or those with the least ability to adapt.</p> <p>In this context the ETZ proposition suffers from a lack of imagination. There are many options that have not been considered, e.g. identification of areas of existing and vacant brownfield sites - of which there are many in the city. It must do better, or the risk is that it will be held as an example of an unjust transition. We can do better with the design of the ETZ masterplan. Urge decision makers, proponents and public authorities to think again and work directly with the affected community.</p> | <p>improve the quality of the burn. The ETZ are working with the local school and the proposal include the opportunity for interpretation. Skills and training are at the forefront of the ETZ principles.</p> <p>7. The sites are allocated in the ALDP. Detailed assessments and surveys will be required as part of any planning application process, where further consideration is given to such topics.</p> <p>8. the level of detail in this document is appropriate for its purpose. Further detailed design will be required as part of the planning application process.</p> <p>9. the end user of the site is not determined at this time. An EIA is required as part of the planning application process. There will be a number of path and networks on flat land that will be accessible for all. Per the reporters recommendations the Masterplan considers measures to avoid, minimise, mitigate, and compensate potential impacts on biodiversity / greenspace that will ensure at least no</p> | |

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| | | | <p>net - loss of biodiversity across the masterplan area. Furthermore detailed landscape schemes will be provided as part of the planning application process. The Masterplan identifies where mitigation will be appropriate.</p> <p>10. per comment 3 the site is allocation in the Adopted Aberdeen Local Development Plan.</p> <p>In terms of Just transition the draft plan states we must takes steps to ensure that national, regional and local energy economies are thriving, and that the Strategy and Plan delivers for all parts of Scotland.</p> <p>The loss of an industry that supports so much of Aberdeen, without the transition away from oil and gas would have huge economic and social impacts on the City and region as a whole. Overall in reducing inequalities the ETZ can contribute in job creation and upskilling. The principle of redevelopment of brownfield sites is clearly set out in the Masterplan and already developments of this type have</p> | |

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| | | | gone through the planning process and have been granted. | |
| 111. | Individual/ Local Resident | <p>Objects to the Draft ETZ Masterplan (ETZMP) based on the following:</p> <ol style="list-style-type: none"> 1. Concerned with the Local Development Plan allocation process. 2. Promotes the use of existing industrial estates and Aberdeen Harbour Board's land instead. 3. No evidence in support or reasons why St Fitticks Park (OP56), Gregness (OP62) or the Doonies (OP61) areas should be developed. 4. There is no current 'manufacturing' requirement at St Fittick's Park/immediately adjacent to the South Harbour. 5. Does not make it clear why related industries should have to 'cluster' together. Concerned this is just a means to acquire/sell areas of land near the new harbour. 6. Makes no reference to land already owned and controlled AHB. 7. States the community involvement was not consultation but information giving. Comments and suggestions were ignored. | <ol style="list-style-type: none"> 1. Per comment 1. 2. The sites are based on the allocations within the LDP. 3. Per comment 2. 4. At this time no operators have been identified. The LDP states the site will support Energy Transition related industries in association with Aberdeen South Harbour and that it "must have a functional association with the South Harbour which precludes it being located elsewhere.... 5. The purpose of ETZ lit is to reposition the North East of Scotland as a globally recognised integrated green energy cluster focused on the delivery of net zero. By clustering uses together it provides a destination for green energy providers to share knowledge and work together to skills in one area. 6. The land the AHB own is not relevant to the development of the masterplan. Ownership of land is | |

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| | | <p>8. Makes no mention of leasing public amenity land for industrial development.</p> <p>9. Access to background data and key related studies/ investigations have not been made available to the public.</p> <p>10 ACC documentation suggesting no impact to the East Tullos Burn is contrary to latest publicly available plan relating to impact on the East Tullos Burn. Latest plan shows re-routing of burn to the North, loss of land and destruction of existing wetlands.</p> <p>11. Does not accept the mitigation proposed can be considered appropriate. It is unacceptable that ETZ Ltd.'s consultants have been under pressure not to consider local public amenity space mitigation.</p> <p>12. Does not accept that proposals to tinker with the remainder of St Fittick's Park could constitute appropriate mitigation for the loss of the existing amenity area of the park to the proposed ETZ.</p> <p>13. Promotes the use of vacant brownfield land instead. Constructing industrial facilities and offices on extensive areas of green and open-space land is unacceptable.</p> <p>14. Planning Decisions should be made by the whole Council, and not the Planning Committee.</p> | <p>not a material planning consideration.</p> <p>7. Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. The main concerns raised by the community during consultation related to the allocation of the sites at St Fitticks and Doonies rather than community requirements or benefits. The principle of development on this site was established as set out in comment 1.</p> <p>8. The leasing of public land is not a consideration for the Masterplan or a material planning consideration.</p> <p>9. Relevant background data is available, the masterplan has been informed by a number of studies but these do not need to be submitted as part of the Masterplan process. However a number of studies will be required as part of any planning application and will be publicly available.</p> <p>10. The plan referred to is shown on page 95.</p> <p>11. The mitigation will be considered in more detail as part of any planning</p> | |

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| | | | <p>application but this identifies mitigation based on studies and assessments so far. Local amenity has been considered and discussed throughout the whole document.</p> <p>12. A large area of St Fitticks Park will remain and will have additional uses such as heritage interpretation, skate park, play facilities. It will also look at the water quality of the burn.</p> <p>13. The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses.</p> <p>14. This report is for full council.</p> | |
| 112 | Individual/ Wider Aberdeen | Object this is an important wildlife area and is the only greenspace left. | Per comment 3 | None |
| 113 | Individual/ Local Resident | <ol style="list-style-type: none"> 1. Raised significant concern with the past development in the Torry area and the lack of response they have had to complaints. Objected to the new harbour, it does not bring tourism into the city and the area was well used before the harbour. Concern proposal removes half of the land utilised by residents. Suggests the proposal is better suited to be built at sea. | <ol style="list-style-type: none"> 1. The existing development in Torry and the new harbour and not for consideration as part of this Masterplan. 2. The closure of Doonies is not for consideration in this Masterplan or report. | None |

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| | | <p>2. object to loss of Doonies Farm.</p> <p>3 Concern Community not being listened to and that this has already been decided.</p> | <p>3 The site allocation is covered in comment 1. Community consultation has been undertaken through both the ALDP and Masterplan preparation process.</p> | |
| 114 | Individual/ Wider Aberdeen | <p>Object to the inclusion of St Fittick's Park in the proposed Energy Transition Zone.</p> <p>1. The Masterplan is not compliant with current National and Local Authority Planning Policies which include NPF4 Policy 23: Health and a number of Aberdeen Local Development Plan 2023 Policies.</p> <p>2. Concern with conflicts of interest involving Aberdeen City Council. The council is a partner in the ETZ, controls the land, is the Planning Authority, has endorsed the Masterplan. Further intends adopting the Masterplan as Planning Guidance, making it a material consideration in Planning Applications.</p> <p>3. No argument in either the business plan or the Masterplan that justifies development of St Fittick's park. Concern that the plan is predicated on speculative development. Concern about the economic risk.</p> <p>4. Lack of transparency over the motivation behind developing the park. Concern it will be used for offices, warehouses and fuel stores instead by the port.</p> <p>5. Concern that any compensation/mitigation obligations will not</p> | <p>1. The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> <p>2. The Council's Planning Service independently assesses masterplans and planning applications on their own merits. The Council's interest in the land will result in greater scrutiny through the Masterplan and planning application process.</p> <p>3. The comment about the proposal being speculative is not for the</p> | None |

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| | | <p>be enforced. States this happened at the south harbour despite a legal agreement. Concern re cumulative health impacts especially given the other development that has occurred in this area. Lack of data re impact.</p> <p>6. Concern there are wider plans to industrialise the Torry area, it needs to be kept to protect Torry. No mitigation for the loss of the park is possible. It is the last accessible green space.</p> | <p>masterplan to consider. This document sets principles for development to aid in any planning application process. It has been confirmed by ETZ that the area of St Fitticks will not be developed until an end user has been identified. As part of any planning application for this site it must be demonstrated that there is a functional association with the South Harbour which precludes the proposed use from being located elsewhere.</p> <p>4. per comment 1</p> <p>5. Mitigation and developer obligations will be determined via the planning application process.</p> <p>6. These sites are allocated as set out in comment 3 of this table. A large area of the park will remain.</p> | |
| 115 | Individual /Wider Aberdeen | I object to the ETZ Masterplan and in particular the loss of greenspace, many homes have no gardens at all and this is free. | Per comment 3 | None |

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| 116 | Individual / Wider Aberdeen | Object to loss of St Fitticks Park it should be retained in full. The green space in Torry should be maintained and for the public's use. | Per comment 3 | None |
| 117 | Individual/ Local Resident | To loss of more greenspace in Torry. | Per comment 3 | None |
| 118 | Individual/ Wider Aberdeen | Reuse abandoned offices, and industrial estates instead of green spaces. There are already "technology campuses" that have never returned added value to the public. | The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. It is not for the masterplan to consider added value from existing technology campuses. | None |
| 119 | Individual /Local Resident | Object to the loss of St Fitticks Park, and Doonies Farm, torrys social deprivation. Use existing industrial estates which lie empty instead. Suggests create a green corridor between Cove and Altens incorporating the city farm. | Per comment 3 The suggestion of an alternative is not for the consideration of the Masterplan on the allocated sites. | None |
| 120 | Individual /Local Resident | Object to the plans for St Fitticks given there are no other green spaces and on health grounds. | Per comment 3 | None |
| 121 | Individual/ Wider City | Object to park being turned into an industrial area and the pollution it will add. Build on a brownfield site. | Per comment 1 | None |

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| 122 | Individual/ Wider City | Object to loss of St Fitticks park and Doonies farm | Per comment 1 | None |
| 123 | Individual/ Visitor | <p>The development of St Fittick's Park should not go ahead for the following reasons:</p> <ul style="list-style-type: none"> -Park is the last green space for an impoverished community, -carbon capture is not viable, -Taking out the existing trees to make a carbon capture is wrong. - other alternative sites available -new luxury housing and marina will be unaffordable <p>the whole development project is "green washing"</p> <ul style="list-style-type: none"> -invest in insulating the people of Torry's houses instead | <p>Per comment 1</p> <p>In terms of trees Masterplan proposed to be updated to include the text "development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover"</p> <p>The statement about carbon capture being unviable and investing in insulating houses in Torry not relevant to the Masterplan document.</p> <p>Unsure to what the new houses in the marina relates, this is not proposed in the Masterplan.</p> | None |
| 124 | Individual/ Visitor | Per 123 | Per 123 | None |
| 125 | Individual/ Wider Aberdeen | This is not a just transition. | The masterplan development has followed the approved guidance and a number of consultation exercises have taken place. The principle of the ETZ is not for the Masterplan to determine given the allocation set out in comment 1. | None |
| 126 | Individual/ Local Resident | Damages the city with disregard of the wishes of the people that live here. | Per comment 3 | None |

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| 127 | Individual/ Local Resident | Object to development at Fitticks Park and surrounding areas – only greenspace that is left. | Per comment 3 | None |
| 128 | Individual/ Aberdeens hire | Object to Non-renewal of lease for Doonies farm. | The ETZ is allocated The sale/lease of land is a separate matter and not relevant to the masterplan or the planning process | None |
| 129 | Individual/ Wider Aberdeen | No factually accurate business plan justifying use land at St Fittick's. Reuse brownfield lands. The proposal will adversely affect the residents of Torry and the neighbouring area re-health, air pollution, noise pollution and the lack of a park to enjoy in the area. | <p>A business plan is not required to be submitted for the purpose of a Masterplan.</p> <p>The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses.</p> <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> | None |
| 130 | Individual/ Local Resident | <p>St Fitticks is an important green space and should be retained. It has wildlife, birds and the community planted trees.</p> <p>Value of the South Harbour promised mitigations have been watered down and are now meaningless.</p> <p>Concern raised about the process and lack of transparency of site</p> | <p>Per comment 1.</p> <p>The south harbour proposal and mitigation associated with it, is not for the masterplan to deal with.</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>allocation. ACC own the land and are not subject to any form of local democratic oversight.</p> <p>All consultations with Ironside Farrar have met with objection.</p> <p>The business plan was not seen nor approved by any local democratic body, nor the local community.</p> <p>Lack of maintenance by ACC on the wetlands which are now overgrown.</p> <p>Believes this is a speculative land grab.</p> <p>Torry residents have had many unjust industrial developments imposed upon them.</p> <p>An Energy Transition Zone in Altens and Tullos in brownfield sites is acceptable but not the loss of the park.</p> | <p>The process for allocation of the site is set out in comment 1.</p> <p>The consultation related to the content of the masterplan and not the allocation of the site.</p> <p>A business plan is not required to be submitted for the purpose of a Masterplan.</p> <p>Current maintenance regime is not relevant to the Masterplan.</p> <p>The site is allocated in the LDP and a Masterplan is required, this is the process that has been undertaken.</p> <p>The comment about the proposal being speculative is not for the masterplan to consider. This document sets principles for development to aid in any planning application process.</p> <p>The development in the area in the past is not relevant to this masterplan. Note acceptability of the brownfield development.</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 131 | Individual/ Wider Aberdeen | Object to the use of the site specified. There are plenty of other sites that could be used. | Per comment 1 | None |
| 132 | Individual/ Local Area | No comments | No comments | None |
| 133 | Individual/ Local Area | This project is not acceptable, as it degrades St Fitticks Park. It isn't either rational because there are no necessary road connection with the Zone. | Per comment 3. Road infrastructure and the relevant assessments will be further considered via any planning application. This document sets principles for the ETZ development on the site. | None |
| 134 | Individual/ Local Area | No proper consultation has been undertaken. There is no counter to the loss of the amenity of St Fitticks park. Proposals are speculative Object to loss of Doonies farm for speculative reasons. | Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. The main concerns raised by the community during consultation related to the allocation of the sites at St Fitticks and Doonies rather than community requirements or benefits. The allocation of the site is not for this Masterplan to consider, this was carried out via the Local Development Plan process). The comment about the proposal being speculative is not for the masterplan to consider. This document sets principles for development to aid in any planning application process. The closure of Doonies is not for consideration in this Masterplan or report, | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 135 | Individual/ Local Area | <p>Concern of community and city impact from increased level of noise and pollution generated by the increase in traffic and manufacturing.</p> <p>Concern for the impact on residents of the south of the city.</p> | <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> | None |
| 136 | Individual/ Aberdeens hire | <p>Object to loss Doonies Farm and St Fitticks park. It is always the less affluent areas of the city impacted.</p> <p>Concern for impact on residents lifestyle and mental well-being.</p> | <p>Per comment 2</p> <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> | None |
| 137 | Business/ Port of Aberdeen | <p>Support for the Masterplan.</p> <p>Specifically support the Marine Gateway elements which recognise the need to support the strategic growth plans for the North East of Scotland embodied in the Port of Aberdeen's role as a National Planning Framework 4 priority site. This will aid its growth with the possibilities associated with sourcing new port-centric industry or supply chain, particularly in the renewables arena, needing direct access to quayside services.</p> <p>Welcomes the work that has been done to protect the green environment and ensure that community interests and needs are included within the Masterplan such as enhancing the amenities and access to greenspace.</p> | Support noted. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>Welcomes the work to ensure the local community benefits from the wider opportunities available as a result of the Energy Transition Zone, embodied within the projects identified as part of the Masterplan, including training and skills enhancement, retraining and education and the availability of new job opportunities.</p> <p>Key to retention of Aberdeen and the North East's position as the North Sea energy hub are the two major initiatives to :</p> <ol style="list-style-type: none"> 1. ensure a fair transition away from fossil fuel production while protecting the livelihood of thousands of residents, maintaining and utilising the expertise gained from the last 50 years association with the energy industry and supporting a world leading energy supply chain; together with 2. working towards ensuring the achievement of Net Zero and climate change goals <p>The work that ETZ is proposing as part of this Masterplan is key to successful achievement of that goal and the Port wholeheartedly supports the plan as presented.</p> | | |
| 138 | Resident/ Wider Aberdeen | Object the green spaces will inevitably be destroyed and deprivation in the area increased further. | Per comment 3. | None |
| 139 | Visitor | <p>Object to loss of last accessible green space as it will negatively impact the community.</p> <p>Understand the need to transition from a carbon economy.</p> | A large area of greenspace and path connections will still be available. The proposal also looks to improve active travel including improved cycle and path connections to the area. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>However transition needs to be fair and just. This is not, it will affect residents who won't benefit from employment.</p> <p>Concern over use of public funds in unproven technologies instead of energy efficiency measures, renewable energy infrastructure and public engagement.</p> <p>Building 'green-washing' factories sends the wrong message and represents 'business as usual'.</p> <p>Proposes the use of other sites that wouldn't result in the loss and damage to an already hard hit community.</p> | <p>Funding is not for the Masterplan to consider. A Masterplan sets detailed guidance on land use, design principles and development programme. It ensure a joined up approach for the development of a complex site(s). It sets a framework and parameters for what is expected as part of the development and when.</p> <p>The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. The masterplan covers both brown and greenfield sites per the allocation.</p> | |
| 140 | Resident/ | Object to the plans for Torry. Use the vacant industrial sites instead. | Per comment 3 | None |
| 141 | Resident/ Wider Aberdeen | Welcome the level of detail, with the associated investigation and analysis. However, no detailed financial information on forecast demand, capital and operational costs. | Detailed financial information on forecast demand, capital and operational costs are not for the Masterplan to consider and are not material planning considerations. e | None |
| 142 | Resident/ Local Area | Object to the development. Use other sites not close to the residents which would not result in health issues for residents. Reuse brownfield land at Altens rather. Object to closure of Doonies. | The closure of Doonies is not for consideration in this Masterplan or report, | None |
| 143 | Resident/ | Leave it alone. | Per comment 1. | None |

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| 144 | Resident/ Local Area | <p>I object to development of St Fitticks Park. Acknowledge the to move away from reliance on fossil fuels but suggest use brownfield industrial units instead.</p> <p>There is a conflict of interest with ACC being part of the ETZ and the authority granting permission.</p> | <p>The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it.</p> <p>Aberdeen City Council and the Planning Authority are not the same thing.</p> <p>The Council's Planning Service independently assesses masterplans and planning applications on their own merits. The Council's interest in the land will result in greater scrutiny through the Masterplan and planning application process..</p> | None |
| 145 | Resident/ Local Area. | Object to loss of habitats and the only green space left in torry. | Per comment 3 | None |
| 146 | Resident/ Local Area. | Object to the concept and raised concerns with transparency of process. This will not benefit the residents of Torry or Aberdeen. | Per comment 1 | None |
| 147 | Resident/ Local Area. | Object to loss of st Fitticks due to very little green space left. | Per comment 3 | None |
| 148 | Resident/ Local Area. | <p>1. The ETZ proposal is contrary to National Planning Framework regarding nature recovery and human wellbeing.</p> <p>2 It will destroy the habitat of East Tullos Burn and the remaining area will be degraded by proximity to industrial pollution.</p> | <p>1. The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to</p> | None |

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| | | <p>3. Concern with destruction of woodland. Planting trees on a landfill site has already proved not to be effective because the surface soil is too shallow.</p> <p>4.Existing concerns in Torry include:</p> <ul style="list-style-type: none"> • health risks already placed on the community by proximity to the sewage works and Incinerator, and high pollution levels. • LEZ has resulted in older cars detouring in Torry. • Traffic reduction in city centre resulted in diverted traffic through highly populated and poor suburbs such as Torry. • Torry are often treated unfairly in terms of development. • One of most underprivileged areas in Scotland with lower average life expectancy. <p>5.During pandemic residents came to Torry/St Fitticks for the environment not found in most of the city. Removal of opportunity to access greenspace for exercise to build roads is criminal negligence by ACC who are representatives for all residents in the city.</p> <p>6.Concern with the decision making process.</p> <p>7. Masterplan should be decided by Full Council.</p> | <p>biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> <ol style="list-style-type: none"> 2. The East Tullos Burn will remain with proposal to enhance and improve water quality set out on pages 59 and 60 of the Masterplan. 3. A detailed landscape plan and scheme will be developed as part of the relevant planning applications when they come forward. A section has been added to the masterplan stating “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover” 4. Existing concerns in Torry do not relate to this masterplan. 5. There will still be spaces to walk and the ETZ aspires to improve walking, cycling and wheeling in the area. | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | <p>6. The site allocation process is set out in the response to comment 1 on page 1 of this appendix. This report is for Council.</p> <p>7. This report is for Full Council.</p> | |
| 149 | Individual/ Wider Aberdeen | <p>Object to the loss of as St Fittick's park and Doonies Farm</p> <p>Decision on the Masterplan should be made by full council.</p> | <p>Per comment 1</p> <p>This report is for full council.</p> | |
| 150 | Individual/ Wider Aberdeen | Should use brownfield land not the green spaces. | The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. | |
| 151 | Individual/ Wider Aberdeen | The loss of St Fitticks will be detrimental to the health of locals | <p>The masterplan has identified the developable area within the site, which is note the whole of the site and equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).</p> <p>Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact</p> | |

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| | | | assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.. | |
| 152 | Individual/ Wider Aberdeen | Object to the loss of St Fitticks Park. Decision on Masterplan should be made by Full Council. | Per comment 1 This report is for full council. | None |
| 153 | Individual/ Wider Aberdeen | Aware we need an ETZ it should not encroach on St Fitticks Park but use empty buildings at Kirkhill. | Per comment 1 This report is for full council. | None |
| 154 | Individual/ Local Resident | Concern why renewable energy comes at the cost of local residents. The green spaces are vital to the well being of residents and wildlife this does not appear to have been considered. Community comments and engagement are not listen to. | Per comment 3. | None |
| 155 | Individual/ Visitor | Objects to loss of green space when it is already limited in the Torry area. Object to doonies farm removal. | Per comment 3 | |
| 156 | Individual/ Local Resident | Concern local residents views have been ignored. Object because plan will have a massive impact on the local community and the park area is important to the physical and mental well being. | Per comment 3. | None |
| 157 | Aberdeens hire Individual/ links with Torry | Use brownfield sites instead. | The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. There is the requirement for both as part of the ETZ proposals. Some consents have already been granted on Brownfield sites. | None |

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| 158 | Individual/ Aberdeens hire | St Fitticks should be saved as a protected green site for the people of Torry and visitors. The proposals will have a significant negative impact on the area and the residents. | Per comment 3 | |
| 159 | Individual/ Aberdeens hire | Limited access to open areas in Torry area, should not deprive the community when there are brown field sites and vacant buildings closeby. | The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. There is the requirement for both as part of the ETZ proposals. | None |
| 160 | Individual/ Wider Aberdeen | Object to the loss of St Fitticks, it is a precious amenity for its local residents and destroying the park will harm their quality of life. The masterplan is not a Just Transition and does not protect the interests of its residents. | Per comment 3 | None |
| 161 | Individual/ Wider Aberdeen | We need to keep our parks to provide the wellbeing to people and animals for their future. | The masterplan has identified the developable area within the site, which is note the whole of the site and equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60). | None |
| 162 | Individual/ Wider Aberdeen | Object to loss of St Fitticks retain existing biodiverse wetlands and outdoor space for people | Per comment 3 | None |

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| 163 | Individual/ Wider Aberdeen | Oppose any more land being reclaimed from St Fitticks Park it has a huge impact. | Per comment 3 | None |
| 164 | Individual/ Wider Aberdeen | I don't agree with the amount of green space being sacrificed for the ETZ. | Per comment 3. The masterplan has determined the developable area | None |
| 165 | Individual/ Wider City – City Centre | I object to the inclusion of St Fittick's Park in the proposed Energy Transition Zone, as outlined in the ETZ Draft Masterplan April 2023 by Ironside Farrar. Concerned over the future of the planet and not necessarily opposed to the ETZ developing on a different site. But the proposed inclusion of St Fitticks Park comes at devastating cost to the local and wider community. | Per comment 3 | None |
| 166 | Individual/ Wider City | Object to loss of St Fittick's park. It is one of the few green spaces that is easily accessible to those residents. Use brownfield land instead. | The whole of St Fitticks park will not be lost, see comment 3. | None |
| 167 | Individual/ Local Resident | Object to the loss of St Fitticks and the precious greenspace and the further development of this area. It has an impact on the local community. Concern this is being driven by an agenda and not a just transition. No benefits returned to the people of Torry | Per comment 3. There are new facilities proposed at St Fitticks including pump park, play park and the opportunity for local parklets off site. These will be considered further as part of any planning application and community involvement in this process is encouraged. | None |
| 168 | Individual/ Local Resident | Object to loss of St Fitticks, only green space for some and it is free. Area already has poor health and deprivations. | Per comment 3. | None |

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| 169 | Individual/ Wider Aberdeen | Object to further building in Torry. If loose St Fitticks no greenspace will be left. | Per comment 3. | None |
| 170 | Individual/ Local Resident | Use the brownfield Altens industrial estate instead. | The ETZ masterplan includes campuses which utilise the Brownfield sites of Altens and Tullos. | None |
| 171 | Individual/ Local Resident | Retain St Fitticks and Doonies sites as green field natural area. Reuse brown field sites which are sitting vacant in Tullos and Altens instead. | Per comment 1. | None |
| 172 | Individual/ Wider City | Object to development on St Fitticks park, it would be a loss of existing wetlands, woods, flora and fauna as well as national and local planning. The proposal would damage physical and mental health and air quality of Torry and its people. A clean energy transition can and must happen in Aberdeen without the loss of a community's most valuable and cherished public asset. | Per comment 3. | None |
| 173 | Individual/ Local Resident | Object to inclusion of St Fitticks Park. Already lost Nigg Bay, had an incinerator built need to retain open space at St Fitticks for the sake of our physical and mental health. | Per comment 3. | None |
| 174 | Individual/ Wider City | People have a right to make decisions regarding their local community and infrastructure. These decisions have not been democratic. | The sites have been allocated in the Local Development Plan and this democratic process is set out in the response to comment 1. Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. The main concerns raised by the community during consultation related | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | to the allocation of the sites at St Fitticks and Doonies rather than community requirements or benefits. The allocation of the site is not for this Masterplan to consider, this was carried out via the Local Development Plan process. | |
| 175 | Individual/ Local Resident | Object the local people are not being listened to use brownfield sites in Altens instead. | Per comment 1 | None |
| 176 | Individual/ Local Resident | St. Fitticks Park would be a great loss to the local community. | Per comment 1 | None |
| 177 | Individual/ Local Resident | <p>Unclear why St Fitticks Park and Doonies Farm need to be developed. ETZ plans do not explain what is going there. There is no need for another industrial area.</p> <p>Use vacant industrial land instead.</p> <p>The community have not been consulted regarding your plans and communication about meeting has not been timeous. A few trees is not going to compensate for this loss.</p> <p>This is a deprived area with families living below the poverty line who depend on the park for recreation.</p> <p>We have been promised many things in the past regarding the harbour still waiting.</p> | <p>Per comment 1.</p> <p>Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. The main concerns raised by the community during consultation related to the allocation of the sites at St Fitticks and Doonies rather than community requirements or benefits. The allocation of the site is not for this Masterplan to consider, this was carried out via the Local Development Plan process. Furthermore this report relates to an 8 week consultation carried out on the content of the Draf ETZ Masterplan.</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 178 | Individual/ Local Resident | Another ACC vision or as the council call it a "Masterplan". Queries why the proposal is to be located on the South side of the City again. Why not the West of the City? | This document has been produced in accordance with the established Aberdeen Placemaking Process Aberdeen Planning Guidance(formerly Masterplanning process). The site has been allocated in accordance with the local development plan process – per comment 1 | None |
| 179 | Individual/ Wider City | Object to the loss of greenspace for deprived communities. Providing a range of outdoor spaces of various qualities and amenities for active as well as more passive outdoor recreation facilities is imperative, and the plan shows some promise in this regard. The community should be continued to be involved in the design and implementation of this space to ensure the benefits to the people. | Any subsequent planning applications for sites within the ETZ masterplan area, will be made available for public comments and consideration. | None |
| 180 | Individual/ Local Resident | Object to loss of widely used greenspace from one of scotland's poorest areas. Plenty other sites that can be used. | Per comment 3 | None |
| 181 | Individual/ Wider City | Object to use of St Fitticks park. It's an area of special interest for both wildlife and history and should remain sacrosanct. In an area that is classed as deprived, green space should be kept this will increase the negative effects of living in a deprived community. | Per comment 3 | None |
| 182 | Individual/ Aberdeens hire | Restrictions are forcing people out with the city to access shops. This is damaging to city centre shops and Aberdeen's economy. | Comments not relevant to the Masterplan | None |
| 183 | Individual/ Local Resident | Torry is becoming a 'dumping ground' for the city. Torry residents are fond of the park and its' existing wildlife. Unoccupied industrial land in Altens should be considered instead. | Past development in Torry is not part of this masterplan consultation. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 184 | Individual/ Wider City | Need more green areas not less. | Per comment 3. | None |
| 185 | Individual/ Local Resident | <p>Appreciates the long term benefits of ETZ. No need for the removal of an already limited supply of green space.</p> <p>Proposed improvements to Tullos Hill will not benefit the residents near St Fitticks Park that have mobility difficulty or lack access to transportation, which is required to access the Hill area.</p> <p>Proposed demolition of the Shell building and other areas in Tullos and Altens that lie unused would be better suited to house everything. Tullos and Altens have a useful transportation system and should be factored into plans rather than disturbing the limited supply of green space in Torry.</p> <p>People's livelihoods will be affected, leaves a feeling of disappointment towards the council. Seems that financial gain is being prioritised.</p> | <p>Per comment 3.</p> <p>The improvements to Tullos hill are one of the proposals. There is also improved access along the coast and the aspirations to improved cycling wheeling and walking in the area. the community and energy coast section shows an illustrative plan of potential walking and cycling routes and how to access them. It is acknowledged that the railway line causes challenges but it demonstrates how the hill and wider network could be accessed. (p69)</p> <p>The demolition of the shell building is not relevant to the masterplan however the ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses.</p> <p>The comment on financial gain is not relevant to this consultation exercise.</p> | None |
| 186 | Individual/ Wider City | Objects to inclusion of St Fittick's Park. Concerned about the impact on natural environment and its value to the health of Aberdeen residents. | Per comment 3. | None |

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| | | <p>Proposals for OP56 will have a negative impact on natural environment. Loss of habitat, nature corridor, and quality of St Fittick's Park due to relocation and changes to East Tullos Burn wetland, grasslands and woodland habitats.</p> <p>Disagrees with the division of natural habitats, the biodiversity existing within these natural areas should be prioritised and green corridors maintained.</p> <p>The documents' mentioning of "restoration" and "amelioration" of damage and loss indicates there will be damage and loss of habitat in the construction and lifespan of the project. Loss of these amenities can never be restored to their former state. Queries why they should be destroyed when many have invested time and effort to develop and protect these amenities.</p> <p>Questions if an Environmental Impact Assessment has been carried out on OP56 and the development as a whole.</p> <p>Questions if proposal meets NPF4's requirement to address the 6 Spatial Qualities, particularly qualities 1-3: "Healthy", "Pleasant", and "Connected".</p> <p>Cites document quotation: "It must be developed sensitively and with an integrated approach that supports place-based investment and delivers wider benefits around the Green Network, active travel connectivity, and enhanced local biodiversity." And section 2.5: "[it will]..Positively enhance the</p> | <p>It was acknowledged in the examination into the ALDP that there would be an impact on habitat but the masterplan is required to include "Measures to avoid, minimise, mitigate, and compensate potential impacts on biodiversity / greenspace that will ensure at least no net - loss of biodiversity across the masterplan area." this is included under each campus such as pages 111-112 for OP61 and 86-90 for OP56.</p> <p>An SEA was carried out as part of the ALDP statutory process. As part of the Masterplan process an HRA was carried out and concluded "In the light of the HRA, it is considered that the proposal will not adversely affect the integrity of any of the protected sites or their qualifying interests, and that the conservation objectives will be met during and after construction as well as following implementation and delivery of the required mitigation measures. The Masterplan document has been updated to include the mitigations outlined in section 6b of the HRA."</p> <p>The Masterplan sets principles and objectives for these allocated sites for Energy Transition. The aspirations in relation</p> | |

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| | | <p>local environment (including biodiversity) across all sites." Requests further clarity to identify as to how the ETZ can claim to maintain and protect biodiversity, let alone enhance it. Use of the word "should" rather than "must" throughout the document leads to questions as to whether developers will actually adhere to aspirations.</p> <p>Arguments for choosing the site are unconvincing, due to the loss of St Fittick's Park, and increased disturbance to Girdleness, East Tullos, Hill, Cove Bay, etc. The extent of work, and timescales proposed for the area that includes St Fittick's Park lack clarity within the document.</p> <p>Legal requirements of NPF4 should be considered before finalising decisions.</p> <p>There should be a fair way to transition to clean energy without trading off and destroying existing good quality environmental benefits.</p> <p>St Fitticks Park and its surroundings should be removed from the ETZ plan. It is a unique place due to the people that care for it. The plan must be debated at an Aberdeen City full council meeting.</p> | <p>to biodiversity and the local environment are set out within the whole masterplan and shows where improvements could be made including quality of the wetlands.</p> <p>The choosing of the site has already been established via the statutory Local Development Plan Process set out in comment 3.</p> <p>The ALDP was adopted after NPF4 and was considered by Scottish Ministers. The principle and policies of NPF4 have been considered as part of the process, including tackling the climate and nature crisis. NPF4 also identified Aberdeen Harbour as one of the 6 National Developments and states, "This will contribute to international and national connectivity, freight and the renewable energy sector". Furthermore it goes on to state that the North East –</p> <p>"This area will evolve, through a just transition, to move industry and business away from the oil and gas sector towards a cleaner, greener future" and it</p> | |

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| | | | <p>“will play a crucial role in achieving Just Transition to net zero. By guiding RSS and LDPs in this area, our strategy aims to:</p> <ul style="list-style-type: none"> • Plan infrastructure and investment to support the transition from oil and gas to net zero whilst protecting and enhancing blue and green infrastructure and decarbonising connectivity. • Focus on continued regeneration through the principles of local living and 20 minute neighbourhoods to sustain the skilled workforce and improve local liveability. • Support continued economic diversification and innovation”. <p>Per comment 3.</p> <p>This report is for Council.</p> | |
| 187 | Individual/ Aberdeens hire | <p>Draft ETZ is poorly presented, written in planning 'speak' and designed not to be readable, should be re-written and presented again so that ordinary people can understand the implications.</p> <p>Concern with the loss of greenspace. Compensation would require considerable additional investment in mental health services for local people.</p> <p>The area will attract additional workers which will place additional pressure on biodiversity through disturbance.</p> | <p>This is a planning document used to inform planning applications for the sites. The document is clearly set out and the illustrations understandable and clear. It has to contain a certain level of technical detail and information in order to ensure all the relevant topic and areas are covered to assist in the determination of planning applications.</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | <p>there are still areas of open space available as part of the proposal as well as improved access and facilities such as the play park and pump track.</p> <p>Biodiversity enhancement is a key part of the proposals and will be located in the most appropriate areas to avoid impact from commercial activities.</p> | |
| 188 | Individual/ Wider Aberdeen | Object to use of the easily accessible open space. The loss of this natural space will have a negative impact on the local population. | Per comment 3. | None |
| 189 | Business/ Own a shop in Torry | Concern the residents are never get listened to. Taking green space for a green agenda just does not make sense. | Per comment 3. | None |
| 190 | Individual/ Local Resident | Object that the development always effects Torry. I strongly object to development of St Fittick's Park. This is a much needed green space for residents. | Per comment 3. | None |
| 191 | Individual/ Local Resident | As 190 | As 190 | None |
| 192 | Business Aberdeen Internation al Airport | The area proposed for the ETZ is wholly within the aerodrome safeguarding zone for Aberdeen Airport. As such aviation impacts should be considered in development of this site. | Noted text added to the Masterplan accordingly. | Add text to the Masteplan confirming that aviation impacts should be considered in |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan development of this site |
|-----|-------------------------------------|--|--|---|
| 193 | Individual/ Local Resident | <p>Very little green space left. Heavier traffic caused by cruise ships and the bus gates, which are increasing journey times, resultantly causing more air pollution. Difficult to access amenities such as the hospital, especially with mobility issues.</p> <p>Councillors need to listen to the people.</p> | <p>The traffic generated by the harbour and the journey times increasing is not for this masterplan to resolve. This masterplan does identify the requirement for an assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward.</p> <p>The requirements for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue(p84, p108, p122, p123, p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the coast road.</p> | None |
| 194 | Individual/ Former resident | Object to loss of a relatively small area which will have catastrophic effects on wildlife and a negative impact residents mental and physical health. | per comment 3 | None |
| 195 | Individual/ Wider City | Per 194 | per comment 3 | None |
| 196 | Individual/ Wider City | Green spaces such as the St Fittick's park area are vital for the physical and mental well-being of a community. Concern ultimately the whole of the parkland will be built over. | Per comment 3. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | The masterplan sets parameters and shows developable areas, this is set out on page 95 for example which shows a large area of the park retained. | |
| 197 | Individual/ Local Resident | Object to everything getting built in either torry or cove. About time they started building at the other side of town. No more, will have no green space left in the south of Aberdeen. | The principle of development has been established within the LDP and as set out in comment 3. The proposal does not build over all the green space. | None |
| 198 | Individual/ Wider City | It's a nice document. 1. Not a JUST transition if valuable green space for Torry residents is sacrificed. 2. Objects to use of St Fittick's Park. Redevelopment of brownfield sites should be used instead of St Fittick's Park and Doonies Farm. 3. Abandon the Hydrogen Campus. Use Cove and Tillydrone stations for fuelling the usual buses, council trucks and cars. Hydrogen for heating has no future. | Per comment 11, discussion on the future of hydrogen is not for this masterplan or consultation, the proposal includes a hydrogen campus that seeks to promote future hydrogen use. | None |
| 199 | Individual/ Wider City | I love st Fitticks park. It's a beautiful piece of calming green in an otherwise heavily built up area. | comments noted. | None |
| 200 | Individual/ Wider City | Object to use of St Fitticks Park, and any other green space in the coastal area. Plenty of vacant space in current industrial estates and also in the city centre that could be used instead. | per comment 3. | None |
| 201 | Individual/ Wider City | Issues: <ul style="list-style-type: none"> plan is too high level. Methods for community involvement and decision making should be clarified | <ul style="list-style-type: none"> The masterplan is a document that sets principles, parameters and requirements of any future development. More details | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <ul style="list-style-type: none"> • Mitigation measures must be included • Relationship between South Harbour and ETZ needs clarification • Clearer distinction between general harbour related activities and energy transition/renewables activities needed • It is untrue or misleading to state that the developable area has been reduced and the East Tullos Burn retained in response to Community concerns. • Objects to development in St Fittick's Park, Gregness and further areas noted on the draft Masterplan. • Lack of evidence for economic benefits of development and its contribution to reaching Net Zero • Overreliance on the effectiveness of mitigation and compensation measures, which will be ineffective considering the significant environmental and social costs. | <p>submissions on design, layout, roads etc would all be required as part of a planning application process.</p> <ul style="list-style-type: none"> • Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. This report relates to an 8 week consultation carried out by ACC Planning, and the decision has been made to take the decision on this masterplan at Council. • Mitigation measures are included for each campus. For example page 87 – 92. The show preventative measures and remediative measures. • The developable area is smaller than the site allocated in the LDP. • Per comment 3 • The evidence for economic benefits is not required for a masterplan. The site is allocation in the LDP, a masterplan takes forward the allocations and policies already established and provides more information. • Per comment 1, and detailed mitigation and compensation being considered through planning applications | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>1. Marine Gateway section too high level, omits detail regarding proposals and mitigation measures, and is insufficient as Planning Guidance.</p> <p>2. Welcomes the framework development of the Innovation and Skills campuses in East Tullos and Altens sites as it has community support and complies with LDP policies for efficient use of brownfield sites.</p> <p>3. Objects to development within St Fittick's Park and Gregness, due to lack of evidence for economic benefits and contribution to net zero transition and environmental and social damage.</p> <p>4. Concern that Gregness, St Fitticks, and Walker Park will not be restored to pre-construction status as per Revision Order.</p> <p>5. Concern Gregness is not suitable for high value manufacturing and was not included in ETZ feasibility study of initial ETZ core area. Concern it will not meet end user requirements. Development will be visually intrusive and not accessible.</p> <p>6. Concern that reference to maximizing the economy potential in the Masterplan, may lead to more areas of land being developed for harbour or ETZ related activity. If the ETZ does not materialised there is concern this land will be repurposed for general harbour activity.</p> | <p>1. This masterplan has been produced in line with the Aberdeen Planning Guidance Placemaking process and sets out parameters and a framework for detailed proposals, but the design detail will be determined through the planning application process. The level of detail is appropriate for this document. It highlights and identifies where and when more detailed assessments, design and information will be required.</p> <p>2. comments noted.</p> <p>3. per comment 3.</p> <p>4. this is not part of this masterplan, mitigation measures relative to the South Harbour will be addressed through a separate process.</p> <p>5. Per comment 3 response</p> <p>6. the Masterplan relates to ETZ allocations in the ALDP</p> <p>7. The function of the ETZ is defined in the masterplan, any proposed development will be assessed against the masterplan. For the St Fittick's Park allocation, the ALDP states that any development on the site must demonstrate a functional relationship with the South Harbour.</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>7. Concern the aim is to essentially move activities from North Harbour to South Harbour, which requires more land availability around South Harbour. The Masterplan plan should define what “energy transition activities are”, and to expand on the “functional needs” enabling them to be in the ETZ.</p> <p>8. Masterplan needs to ensure that only land currently within OP62 is used, and not any out-with OP62.</p> <p>9. Concern the social and environmental damage to St Fittick park cannot be mitigated, despite recognition of need for mitigation.</p> <p>10. Concern community objections to the proposal will be ignored.</p> <p>11. Concern the suggested mitigation measures are not sufficient, considering anticipated significant damage outlined in the LDP Environmental Report. Need for more detail on development positions, sites, and extent to ensure the Masterplan can be effective supplementary guidance. Suggestion that no biodiversity net loss is ineffective in protecting biodiversity, considering initial lack of biodiversity in overall ETZ area which largely includes brownfield sites.</p> <p>12. Suggests claims of sustainable economic growth are perhaps inflated and over relied upon in document. Need for further detail on specifics of economic prospects of the ETZ. Additionally, concern that job forecasts in offshore wind and renewables are not reliable.</p> | <p>This is carried through into the Masterplan. Further justification and explanation regarding the uses would be required as part of the planning application process.</p> <p>8. The masterplan covers the allocated sites and parts of OP 62 as set out in the ALDP.</p> <p>9. Mitigation measures are set out in the Masterplan and will be detailed further through the planning application process.</p> <p>10. The community objection relates largely to the allocation of the sites in the LDP. See comment 3.</p> <p>11. Mitigation will be agreed through any planning application process and legal agreement and as such can be monitored.</p> <p>12. See comment response 3.</p> <p>13. See comment 3 response</p> <p>14. See comment 3 response</p> <p>15. Lack of confidence noted.</p> <p>16. The masterplan shows the developable area at St Fitticks per the requirement of the LDP. The masterplan does not allow development to take place without</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>13. The Masterplan should not be approved and adopted until more detail is made available to confirm that the development of green space achieves economic gain in-line with LDP policy NE3.</p> <p>14. Concern ETZ sites are not appropriate for offshore wind development industry standards. Recommends more feasible sites such as Port of Nigg, Leith and Dundee and particularly Ardesair and Cromarty, where there larger amounts of flat land, co-located to harbours, with level access to sites.</p> <p>15. Lack of confidence in ETZ due to failed 2014 Energetica Corridor that did not meet its aims in creating a 'world class corridor' for renewables.</p> <p>16. Urges Masterplan to rule out any speculative developments in St Fittick's Park until a firm commitment is agreed with a developer.</p> <p>17. Proposals for hydrogen campus at Doonies should be abandoned. Aberdeen already has two electrolyser sites manufacturing hydrogen, and the hydrogen hub will have electricity supplied by solar panels on OP64. Therefore, there is no justification for a hydrogen manufacturer to be at Doonies Farm.</p> <p>18. Calls for a method to monitor provision of mitigation measures.</p> | <p>going thought the relevant planning applications process and assessment first.</p> <p>17. OP64 is allocated in the LDP and that is the proposal that has been put forward by the ETZ masterplan.</p> <p>18. Mitigation will be agreed through any planning application process and legal agreement and as such can be monitored.</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 202 | Individual/ Former Torry Resident | Object to more industrialization and impact on Torry. Need to think of health impact both mentally and physically. Object to taking some of the golf course. Also annoyed by loss of Doonies, concern that it is land grabbing. | A Health Impact Assessment will be provided as part of the planning application process. The golf course is not being developed. The sites are allocated in the LDP per comment 1 response. | None |
| 203 | Individual/ Wider Aberdeen | Object to loss of St Fitticks. It's a beautiful piece of calming green in an otherwise heavily built up area. | Per comment 3 response | None |
| 204 | Individual Visitor | Oppose the Masterplan, as it would deprive people in Torry of their only green space. This would have a highly negative impact on their physical and mental health, as well as being very damaging to the environment in a time of climate crisis. | Per comment 3 response. | None |
| 205 | Amenity Group/ Aberdeen Civic Society | <p>1.Masterplan lacks concern for public amenity. Given the current surrounding situation. The proposed allocation of sites within St Fitticks will have a negative impact on physical and mental health, will result in a loss of amenity and impact on health.</p> <p>2.Available Brownfield sites suitable for redevelopment should be pursued instead (e.g. – former Shell headquarters) to provide ETZ.</p> <p>3.Torry is deprived area and residents live within close proximity to sewage treatment plant, an incinerator, and a working harbour. Loss of the accessible St Fittick's Park would negatively impact on life expectancy and public health within area.</p> <p>4. Compensatory parkland/woodland is not as accessible in location as St Fittick's, and existing amenity would be lost in what remains of park due to increased air/noise/light pollution</p> | <p>1.per comment 3. The Masterplan also stipulates the requirement for a Health Impact Assessment.</p> <p>2.The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses.</p> <p>3.the existing situation in an area is not part of this masterplan.</p> <p>4.as part of a landscaping scheme planting and details will be required. Detailed design and further assessments submitted</p> | None |

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| | | <p>5.Re-routed coastal road will impact on setting of St Fittick's Kirk (scheduled monument and Commonwealth war grave).</p> <p>6.Loss of East Tullos Burn wetland and woodland is contrary to Aberdeen City Council policies.</p> | <p>with planning applications will consider the potential impact of elements such as light. This document sets out parameters and a framework for detailed proposals, but the design detail will be determined through the planning application process.</p> <p>5.further assessments and studies will be required as part of this proposal. HES have been involved in discussions on the development of the masterplan in relation to St Fitticks and will continue to be moving forward.</p> <p>6.the east tullos burn and wetland and woodland will not be lost. There will be replacement planting and a detailed landscaping scheme developed for the burn. Proposals for the burn can be seen on pages 59 and 60.</p> | |
| 206 | Individual/ Wider City/ | <p>Appears to be conflict of interest due to ACC being a business partner in ETZ scheme, and with the masterplan requiring agreement by Development Management Committee.</p> <p>ETZ scheme re-zoned St Fittick's Park without public consultation and changed Trust's constitution so Council officer can sell/lease the land. Verbal agreement (14/12/22) that any decision over Lands of Torry would be made by Full Council.</p> | <p>The Council's Planning Service independently assesses masterplans and planning applications on their own merits. The Council's interest in the land will result in greater scrutiny through the Masterplan and planning application process. The ETZ is allocated in the ALDP per comment 1. The sale/lease of land is a separate matter and</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | not relevant to the masterplan or the planning process. | |
| 207 | Individual/ Local Resident | The draft masterplan needs to consider vacant brownfield sites in Altens, which could be repurposed for the ETZ rather than industrialising the remaining greenspace on the South side of the City. | <p>The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses.</p> <p>The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> | None |
| 208 | Individual/ Local Resident | <p>ETZ development will have a devastating effect on the St Fitticks Park area.</p> <p>ETZ should not extend past the sewage treatment works. This would still allow easy access to the new harbour expansion without impacting green space.</p> <p>Don't believe that Torry's loss would be outweighed by what these benefits will provide the area.</p> | per comment 1. Per the Reporters recommendation the Masterplan has determined the "Areas which should remain undeveloped and the extent of any buffer zones." | None |
| 209 | Individual/ Local Resident | <p>This park is the only green space that is left in Torry.</p> <p>Torry and the surrounding has already too much industrial sites.</p> <p>This is a deprived area with everything being taken away.</p> | An area of the park will still be retained with additional facilities and improvement made to it. | None |
| 210 | Individual/ Local Resident | <p>The proposed sites are green belt areas.</p> <p>Questions the Scottish Government proposal of the south harbour and lack of consideration on traffic impact.</p> | the sites are allocated in the LDP and as such are not greenbelt land. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | The harbour is in place and not for consideration in this Masterplan. | |
| 211 | Individual/ Local Resident | Object to building on St Fittick's Park. This is a beautiful area with lots of wildlife using the land and water and is in a deprived area, should be protected. Don't take the park. | per comment 3. | None |
| 212 | Individual/ Wider City | <p>Development must respect St Fittick's church and not dominate it. Encroachment on St Fittich's Park must be minimal, with greenspace preserved for the community.</p> <p>A pedestrian bridge linking St Fittich's Park to the path network on Tullos Hill would increase access to green space.</p> <p>The loss of Doonies Farm is regrettable.</p> <p>The inhabitants of Torry always seem to get a rough deal.</p> | <p>The setting of st Fitticks church has changed over the years, the masterplan considers St Fitticks church and on page 64 confirms that sensitive landscaping treatments will be provided to minimise impact on setting arising from industrial development and potential road alignment. This would be developed in conjunction with HES and ACC archaeology services they have also been involved in the preparation of the masterplan.</p> <p>A pedestrian bridge would be challenging because it would go over third party land in the form of the railway line.</p> <p>Other comments noted.</p> | none |
| 213 | Individual/ Wider City | <p>Opposed to the destruction of the park which will lead to loss of rec spaces and impact on stress.</p> <p>Doubt the council will oppose the plans and questioned honesty.</p> | per comment 3 | None |
| 214 | Individual/ other | Object to loss of green spaces suggest use vacant brownfield land instead. Use the brown site areas that are derelict. Loss of archaeology | per comment 1 | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 215 | Individual/ Aberdeens hire | <p>St Fitticks and to a lesser extent Doonies are precious community assets</p> <p>Torry is a deprived community and ETZ won't bring them much in the way of compensation. Use existing industrial land instead.</p> <p>Note need for energy transition but top down strategy is not fair and unjust.</p> | <p>The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> <p>The sites were allocated in the Aberdeen Local Development plan and this masterplan has been carried out in accordance with the Aberdeen Planning Guidance Placemaking Process. This is the process that is carried out when considering sites for development. As part of this process consultation is carried out at all stages and input from stakeholders and consultees welcomed.</p> | None |
| 216 | Individual/ Local Resident | <p>Concern with loss of heritage and community assets</p> <p>Oppose current plans which have no benefit to the community. Object to development on St Fitticks and to the loss of Doonies.</p> | per comment 3. The plan sets out mitigation principles throughout the document for example on pages 87 -92. | None |
| 217 | Individual/ Wider City | <p>Object to the use of St Fittick's Park for speculative development.</p> <p>Develop unused industrial sites instead. Concern that the masterplans and the positive content never come to pass.</p> | <p>per comment 1</p> <p>The comment about the proposal being speculative is not for the masterplan to</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | Concern that the promises of jobs and money never come to pass, but the land eroded and damaged. | consider. This document sets principles for development to aid in any planning application process. Jobs and skill training are at the forefront of the ETZ aspirations. These proposals are on allocated land in the ALDP | |
| 218 | Individual/ Local Resident | Torry has enough Industrial areas and pollution already. Object to inclusion of St Fittick's Park due to loss of nature and wildlife. Develop surrounding Industrial estates instead. | per comment 1 | None |
| 219 | Individual/ Local Resident | Per 218 | per comment 1 | None |
| 220 | Individual/ Local Resident | Strongly object to ETZ masterplan and inclusion of St Fittick's Park within it. Torry residents unduly impacted by ETZ masterplan. Unacceptable loss of greenspace, playing fields and loss of part of park is against SG policy and NPF4 policy for biodiversity and reduces places for healthy outdoor activity. Proposed ETZ development in Torry would be contrary to NPF4 policies regarding nature recovery and human wellbeing and would result in destruction of plants/animals and degradation of wetland habitat due to proximity to new sources of industrial air/noise/light pollution during construction and operation. Reporter's measures to ensure no net loss of biodiversity/greenspace cannot be achieved. | Objection noted, per comment 1. The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation. | None |

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| | | <p>Compensatory planting at Tullos Wood inadequate to address losses elsewhere and pathway to access this is longer and shared with HGVs.</p> <p>Pump park and play areas would expose young people to air pollution from increased HGV traffic.</p> <p>Detrimental impact on setting and significance of St Fittick's Church and Churchyard by rerouted Coast Road.</p> <p>Concern that public consultation over ETZ was 'tick box exercise' and that residents concerns not being taken on board.</p> <p>Remaining undeveloped land prone to flooding.</p> | <p>Final details of mitigation and compensation will be determined via the planning application process but the masterplan clearly sets out what these could be.</p> <p>The setting of St Fitticks church has changed over the years, the masterplan considers St Fitticks church and on page 64 confirms that sensitive landscaping treatments will be provided to minimise impact on setting arising from industrial development and potential road alignment. This would be developed in conjunction with HES and ACC archaeology services they have also been involved in the preparation of the masterplan.</p> <p>Community engagement was carried out by the design team as set out on pages 7-16 of the Masterplan. This report relates to an 8 week consultation carried out by ACC Planning, and the decision has been made to take the decision on this masterplan at Council. As part of this process consultation is carried out at all stages and input from stakeholders and consultees welcomed</p> <p>A flood risk assessment is required as part of the planning application process.</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| 221 | Individual/ Local Resident | Object to removal. Alternative sites for ETZ are available. Concern over impact on health and life expectancy on Torry residents | Per comment 3. | None |
| 222 | Individual/ Raised locally | Object to the use of St Fitticks Park for development and the destruction of a much loved place. Concern that Torry also has a number of other uses put there that have a negative impact. To take away the only green space for the locals would be a disgrace. | Per comment 3 The existing uses in the area are not part of this masterplan. | None |
| 223 | Individual/ Local Resident | Object to loss of St Fittick's Park which is an integral part of health and play. The area has already been subjected to the other negative uses and the community would be impacted on further by the loss of the park ,which is the only green space in already seriously deprived area. | Per comment 3 | None |
| 224 | Individual/ Local Resident | ETZ should be located somewhere else everything always gets put here. | Per comment 1. | None |
| 225 | Individual/ Aberdeens hire | Concerned with the allocation of St Fitticks Park as an 'Opportunity Site' OP56. This is an community of multiple deprivation and removing greenspace will further exacerbate the local health problems. Concern with what Torry has taken in the past. ACC should remove St Fitticks Park from their ETZ. Energy Transition needs to be sustainable environmentally, socially and economically. ACC is not considering the first 2 pillars of sustainability with the development of the park. | Per comment 3 The Council's Planning Service independently assesses masterplans and planning applications on their own merits. The Council's interest in the land will result in greater scrutiny through the Masterplan and planning application process, | None |

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| | | There is also a clear conflict of interest with ACC approving development plans for an entity it plays a part in the ETZ company. | | |
| 226 | Individual/ Local Resident | Should not proceed | Per comment 1. | None |
| 227 | Individual/ Local Resident | Feel it would lead to mental health issues due to restrictions on pathways etc. Families depend on local green areas for exercise and enjoyment, already lost land to the harbour. Should not be built near housing and a school. | per comment 3 | None |
| 228 | Individual/ Local Resident | This will have a negative impact on residents mental health and wellbeing as well as impacting on the school and residents. It is industrialising Torry. Concern with the loss of assets such as the bay and now Doonies farm and st fitticks park are in danger of going. | Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. Per comment 3 | None |
| 229 | Individual/ Aberdeens hire | The area that is St Fitticks Park should be maintained & preserved due to its unique features. Once it's gone this can never be restored to its original state, which would be a travesty! | Per comment 3 | None |
| 230 | Individual/ Local Resident | The wetlands are needed for mental health and to allow time to reflect an breathe. Use the empty lots in altens instead not the wetland. | The proposal does not remove the entire wetlands. The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses. | None |

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| 231 | Individual/ Local Resident | <p>Energy transition should not be at the expense of the welfare of Torry residents as this runs contrary to concept of “just transition”.</p> <p>Proposal would result in loss of area rewilded by local community, with the small remainder of the park unsuitable for most of its intended uses.</p> | Per comment 3 response | None |
| 232 | Individual/ Local Resident | Object to proposed plans for st.fitticks park/doonies farm. Need to stop all development of these green areas there is very little left for us in Torry. | Per comment 3. | None |
| 233 | Individual/ Visitor | <p>Green space and parkland is scarce in Torry already a lack of social amenities surrounding St Fittick’s park.</p> <p>Concern with loss of park with its rich plant and wildlife and area of solace for people living with mental health issues.</p> <p>To remove a large part of this space to replace it with an industrial site and the resulting air and noise pollution would negatively impact the area.</p> <p>Torry has already had much negative development within it and have a right to live in pleasant surroundings.</p> <p>These new ‘initiatives’ should be shared with other areas of Aberdeen.</p> | <p>Per comment 3 response.</p> <p>The relationship of the ETZ with the south harbour is fundamental. The Energy Transition Zones are to bridge the transition from one industry to another and due to its location adjacent to the South Harbour OP56 is a keystone to this and potential catalyst for wider economic and environmental change.</p> | None |
| 234 | Individual/ Aberdeens hire | Object fundamentally to green spaces being used for industrialisation. Use brownfield sites sitting empty in Tullos | Per comment 1. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | instead. The green spaces cannot be replaced for the benefit of a business. | | |
| 235 | Individual/ Aberdeens hire | <p>Loss of park will have significant detrimental impact on physical and mental health (and general wellbeing) of residents of Torry.</p> <p>Pursuit of ETZ does not address root causes of climate/environmental problems. Represents economic growth at expense of environment.</p> <p>Hydrogen generation and manufacturing has many negatives and leaks can counter-act gains through secondary greenhouse gas impacts. Dumping of CO₂ under North Sea is expensive.</p> <p>ETZ scheme is “riddled with colonial and harmful logics”.</p> | <p>Per comment 3</p> <p>Comments re hydrogen generation are not relevant to this masterplan.</p> | None |
| 236 | Individual/ Wider City | <p>Object to the development of the green space and again development being placed on Torry.</p> <p>Concern with the incinerator and should stop building it.</p> | <p>Per comment 3</p> <p>The existing uses within the area are not for consideration within this report, that is an existing situation. The incinerator is completed and operational.</p> | None |
| 237 | Individual/ Local Resident | Objects to the development of St Fitticks Park. it is well used and loved. Enough other negative development in the area already. | Per comment 3 | None |
| 238 | Individual/ Local Resident | I strongly object to this Masterplan - the proposals for the intended use of St Fittick's Park are contrary to National Planning Policy and in particular, will destroy an important area of amenity (of which there are few in this locality) and essentially throw away an area which has become a vibrant habitat for wildlife over a number of years following previous neglect. | The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, | None |

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| | | | health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation. | |
| 239 | Individual/ Wider City | <p>1.Object to the The ETZ masterplan and the loss of greenfield sites (St Fittick's Park, Doonies etc).</p> <p>Should use large amount of brownfield sites adjacent instead (e.g. Altens)</p> <p>2. The proposed use of the ETZ as a laydown area for offshore wind construction is impractical as the site is extremely marginal</p> <p>3.Concern that the road infrastructure is totally inadequate to cope with the volume and type of traffic that the ETZ would generate with no plan to improve it.</p> <p>4.It is socially unacceptable to destroy the only local green space available to residents of Torry which is already surrounded by NEW industrial development (South Harbour, Incinerator Plant).</p> <p>5.The job creation figures are unrealistic and impossible to achieve.No credible business case for this development has been presented</p> <p>6..Raised concerns with the process of site allocation, changes to trusts conditions and the fact that ACC is a business partner on</p> | <p>1.Per comment 1</p> <p>2.The end uses have not been determined yet, this document sets parameters and principles for development.</p> <p>3.The level of detail required at Masterplanning stage does not include detailed assessments for topics like roads. An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward. The requirement for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue(p84, p108, p122, p123, p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the coast road.</p> | None |

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| | | the ETZ. | 4 – per comment 3. 5. A business plan is not required to be submitted for the purpose of a Masterplan. 6. per comment 3. | |
| 240 | Individual/ Local resident | <p>Object development on St Fitticks Park</p> <p>It provides the only green open space in Torry , which is essential for fitness and well being.</p> <p>Raised concerns with the way residents of Torry have been treated by ACC which is not replicated elsewhere.</p> <p>Highlight that St Fitticks Park and golf course are the only green spaces left in Torry particularly since the loss of Doonies</p> <p>Torry gets lost of visitors here on the Dolphin watch, and the coastal paths is it not an unwanted eyesore. Building at St Fitticks Park would be a huge loss of this important area.</p> <p>Develop Tullos industrial estate instead.</p> <p>We are not against green transitions, but not to take away one environmentally important space, and destroying it, in an area that has already paid the brunch of development does not make sense.</p> | As per comment 3 and 12 response | None |
| 241 | Individual/ Wider City | Object to development of St Fittick's Park and Doonie's Farm and seek removal from ETZ. | Per comment 3. | None |

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| | | <p>Torry could be a recognised example of “just transition” that benefits those that live/work/visit Torry, and loss of SFP, wetlands and other Greenspaces would have negative impact.</p> <p>Wetlands at Tullos have great value to city in terms of health/wellbeing, vibrancy, biodiversity and for carbon capture.</p> <p>Focus should be on creating jobs in Torry and promotion of heritage and history of the area as well as local business and community energy schemes. SFP and coastal core path are assets that could be better supported and could be tourist destination.</p> | <p>Enhancement at St Fitticks Church will be part of the ETZ proposals including interpretation.</p> | |
| 242 | Individual / Aberdeens hire | <p>Seeks removal of St Fittick’s Park and Doonies Farm from draft ETZ masterplan and not to be included within industrialised zone.</p> <p>Greenspace benefits health, wellbeing, vibrancy of place and is important for supporting biodiversity and carbon capture. Tullos wetland/burn is particularly valuable in this regard.</p> <p>St Fittick’s Park could provide opportunity for eco-tourism, that could also support social enterprises and provide employment to locals. Torry and St Fittick’s should become ‘must visit’ destination that can offer dolphin watching opportunities, and attract tourists/cruise ship visitors</p> <p>More focus could be made of heritage and history of the area, and promotion of community energy schemes and local businesses.</p> | <p>Per comment 3.</p> <p>It is not for the masterplan to consider alternative uses for this allocated site.</p> <p>Enhancement at St Fitticks Church will be part of the ETZ proposals including interpretation.</p> | None |

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| 243 | Individual / Aberdeens hire | Torry needs the green space to be conserved for future generations. Children need St Fitticks park and Doonies to be left alone. The ecologically important wetlands of the area are a vital part of the fight against climate change. | A large area of the park will be retained as part of the proposals and these include a new play park and pump park. The wetland is not being removed and proposal to improve the quality of it are part of the Masterplan (p59 and 60). | None |
| 244 | Individual/ Wider | Want St Fitticks Park, Doonie's Farm and any other green spaces removed from the ETZ. They provide vital habitat for biodiversity and an essential space for local residents. | Per comment 3. | None |
| 245 | Individual/ Local Area | By building on, and destroying an environmentally important wetland with a lot of biodiversity reflects very badly on Aberdeen leadership, and are prepared to destroy these important areas if there is enough money waving in front of them. | The wetland is not being destroyed and proposal to improve the quality of it are part of the Masterplan (p59 and 60). | None |
| 246 | Individual/ Wider City | The ETZ is best seen as an economic as opposed to a geographical zone. Use brownfield land at altens and tullos instead. Remove St Fitticks Park, Doonies Farm and any green spaces from the ETZ. Not a just transition. | per comment 1. | None |
| 247 | Individual/ Local area | Oppose the planned build on a beautiful large green space that has cultivated wildlife and new fauna. Plenty other areas that could be built on. No need to take away a beautiful landscape. | per comment 3 | None |
| 248 | Individual/ Aberdeens hire | Per 242 | Per 242 | None |
| 249 | | Per 242 | Per 242 | None |

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| 250 | | Object to the loss of a natural habitat should be conserving green spaces etc. Concern that locals are being ignored, should work with the community. St Fitticks is currently an accessible area for all to enjoy and relax. This land is not needed. | Community consultation that took place as part of the Masterplan development is set out on | None |
| 251 | | Per 242 | Per 242 | None |
| | Emails start | | | |
| 252 a | Local Area | Morven court residents object to the abolition of the well used St.Fittick's Park concern with loss of fresh air and clean nature. | per comment 3. There is still an area of park and wetland available as part of the development. | None |
| 253 | Individual/ Aberdeens hire | <p>Disagree with the proposal to include St. Fitticks Park in the ETZ, and the decision making.</p> <p>There have been numerous representations regarding the value to the people Torry and Balnagask of this simple green open space. The community of Torry and Balnagask is already adversely affected by industrialisation in Tullos and Altens.</p> <p>St Fittick's Park is not accessible and boggy and therefore seems unsuited to ETZ. Available Brownfield land near South Harbour is better site and would avoid further negative health (and other) impacts on disadvantaged people of Torry/Balnagask.</p> <p>Decision seems based more on cost and convenience to Council, and decision should be made at Full Council.</p> | <p>per comment 3</p> <p>The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> | None |

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| 254 | Individual/ Local Area | Objects to inclusion of St Fitticks Park and Doonies Farm | Per comment 1. | None |
| 255a | Individual/ Wider City | <p>Object to Masterplan, specifically inclusion of St Fittick's Park and Doonies Farm. No reason to include environmental resources within ETZ.</p> <p>ETZ development of Opportunity Sites in Torry of 56 and 62 will be contrary to key policies in NPF4 regarding nature recovery and human wellbeing.</p> <p>Development would destroy existing plants/animals if Tullos Burn and wetland is moved. Habitat degradation and biodiversity loss due to new pollution.</p> <p>Loss of woodland and grassland is not adequately compensated by new planting or greenspace elsewhere and doesn't address air quality, loss of recreation opportunities, flood mitigation or visual amenity. New areas also less accessible.</p> <p>Detrimental impact on setting of Churchyard and St Fittick's Church (scheduled monument) due to re-routing of the Coast Road.h</p> | <p>Per comment 2.</p> <p>The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ the move to net zero and climate mitigation and adaptation.</p> <p>Further detailed studies and designs are required for the burn but it should be noted that the masterplan aims to enhance water quality and wetland habitat. Per page 59 and 60 of the Masterplan.</p> <p>A section has been added to the masterplan ensuring an overall <u>net gain</u> in tree cover. Though the area has been reduced that does not mean that equal or better planting and landscaping cannot be provided. The proposal includes features</p> | None |

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| | | | <p>such as a park and pump park. Finally a Flood risk assessment would be required as part of the planning application process.</p> <p>The rerouting of the coast road and its relationship to st Fitticks have been discussed with Historic Environment Scotland as well as the councils archaeology service, further discussions will be required as proposal progress. Their comments can be seen under comment 254.</p> | |
| 246 | Business/ Aberdeen (CBRE) | <p>Aberdeen has been at the forefront of the energy industry since the 1970's creating significant amount of jobs and prosperity to the region.</p> <p>With the shift in focus from oil and gas to more greener forms of energy there is significant potential for the North East to be at the forefront of this new green revolution, and the proposals for Energy Transition Zone will help create the right working environment to embrace this new green world we are entering in to.</p> <p>Other regions in the UK are getting their green energy infrastructure plans in place so critical that Aberdeen and the Energy Transition Zone progress these plans to provide a credible</p> | Comments noted and welcomed. | None |

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| | | <p>proposition for these same organizations to set up a base in the North East.</p> <p>Fully support this masterplan.</p> | | |
| 247 | Individual/ Aberdeens hrie | <p>I object strongly to the inclusion of St Fittick's Park in the proposed Energy Transition Zone, as outlined in the ETZ Draft Masterplan</p> <p>Object to building on greenfield land when there is so much vacant brownfield land available across Aberdeen. There are more than 200 acres of land zoned for business park development that have yet to be taken up.</p> <p>Concerns with the process and what is trying to be achieved,.</p> <p>Demand that you remove Opportunity Site 56 in St Fittick's Park from the ETZ and amend the draft Masterplan accordingly.</p> <p>No reason for having a renewables park in this location.</p> | <p>Per comment 1</p> <p>The site was considered and assessed for these uses as part of the ALDP process. The location it allows the opportunities to link to the harbour and the offshore sector beyond. This area well located adjacent to the Altens and Tullos industrial areas.</p> | None |
| 248 | | Demand that the masterplan is decided by full council and not only planning committee. | This report is for Council. | None |
| 249 | Individual/ Edinburgh | <p>Fossil fuel industries cannot be trusted to manage transition to net zero.</p> <p>Local communities should lead efforts to decarbonise, not profiteering companies.</p> | per comment 1 response. | None |

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| | | Torry residents already feel short-changed by previous decisions on their community and oppose this “flawed plan”. | | |
| 250 | Individual/ Aberdeen | Object to re-zoning of St Fittick’s Park for industrial use for the ETZ as there are other suitable sites in Altens. Loss of park will negatively impact residents, and proposed compensatory greenspace is already greenspace and is difficult to access and inferior compensation for biodiverse local park. | Per comment 1. | None |
| 251 | Business/ Aberdeen (Shell Internation al Ltd) | <p>Shell are supportive of the ETZ masterplan, which presents a vision for creating an integrated energy cluster focussed on net zero.</p> <p>The masterplan sets out a much-needed strategy for the regeneration of Altens and East Tullos Industrial Estates by maximising the impact Aberdeen South Harbour and surrounding land, alongside investment in infrastructure and delivery of transformational innovation & skills projects and is in line with Shell’s vision for the Tullos site.</p> <p>The provision of ‘fit for purpose’ development sites and property solutions within the existing industrial estates will be essential to attract new investment to the region.</p> <p>I am leading Shell’s work on determining the best future use of our old Tullos office campus and there is significant alignment with this draft Masterplan.</p> | Comments noted and welcomed. | None |
| 252 | Individual | Strongly object to proposal. Suggests hypocrisy over Council’s pledge to maintain and improve Greenspace while removing one | Per comment 3 response. | None |

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| | | <p>of Torry's remaining areas. It will result in loss of plants/wildlife and biodiversity.</p> <p>Pollution will increase due to proposal and this will negatively impact health and welfare of local residents and exacerbate existing issues.</p> <p>Questions importance of the site to the ETZ project and states consultation meetings were more of a "show and tell" that didn't take onboard feedback.</p> | Potential for pollution will be assessed and relevant mitigations highlighted through detailed planning application stage. | |
| 253a | Individual/ Wider City | <p>Development of St Fittick's Park and Doonie's Farm should be stopped.</p> <p>Development would greatly harm a marginalised community and would fail to fulfil goals of Just Transition to Net Zero and UN Sustainable Development Goals. It would also result in health impact to local residents through air pollution and result in destruction of wetlands, grasslands and woodland habitats.</p> <p>Would also result in loss of amenity spaces that is already lacking, and increase road safety concerns from increased volume of traffic.</p> | Per comment 3 | None |
| 254 | Individual/ | Seeks full assessment of issues around proposal including environmental assessment, HIA and consideration of reputational impact on city as well as impact on environmental, biodiversity and LOIP. | The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and | None |

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| | | <p>Seeks removal of St Fittick's Park and Doonies Farm from draft ETZ masterplan and not to be included within industrialised zone.</p> <p>Greenspace benefits health, wellbeing, vibrancy of place and is important for supporting biodiversity and carbon capture. Tullos wetland/burn is particularly valuable in this regard.</p> <p>St Fittick's Park could provide opportunity for eco-tourism, that could also support social enterprises and provide employment to locals.</p> | <p>opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).The document sets out on page 167 the further assessments that are required for planning applications including an EIA, that will be provided and considered through the planning application process. ACC has carried out a Habitat Regulations Appraisal which considers the masterplan proposals against the Special Areas of Conservation and other designated sites and identified the mitigation required to avoid adverse impact on the designated sites and their qualifying species interests. These will be added to the Masterplan for clarity and the HRA made available foron the Council's website.</p> <p>The sites are allocated in the LDP for Energy Transition Zone per the process set out in comment 1.</p> | |
| 255 | Individual/ Local Area | Object to further industrial development in Torry Area. Torry is one of the deprived areas in the city yet every bit of greenspace is being destroyed. | Per comment 1 response | None |

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| | | <p>Already have an incinerator and sewage works adjacent to the community.</p> <p>Object to development at Doonies a loss to the community of a valued asset.</p> <p>Raised concerns that comments are to being listened to.</p> | | |
| 256a | Individual/ Local Area | <p>Increase in traffic since the South Harbour construction began and, although promises were made HGV traffic continues to speed through and pollutes residential areas. Increase in traffic noise is unbearable and will increase with this project. We need clean air.</p> <p>Object to loss of green areas, existing woodland and farmland being lost to development.</p> <p>Residential areas should be protected and used for residential purposes only.</p> <p>Use vacant brownfield sites instead.</p> | <p>For this development an assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward. The requirement for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue(p84, p108, p122, p123, p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ relates to other existing and committed projects including the Aberdeen South Harbour Link Road. Assessments will also be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time.</p> | None |

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| | | | Per comment 1, re residential areas and brownfield use. | |
| 257 | Individual/ Local Area | Concerns over development on St Fittick's Park. It is an area full of wildlife, development would be detrimental. Use brown sites in Altens, Tullos and the West end of Aberdeen instead - more environmentally friendly to reuse these spaces. Decision on this should be made at full council. | Per comment 1. This report is for Council. | None |
| 258 | Individual/ Local Area | Safe open spaces for play/recreation are needed in Torry for health and wellbeing of people. Development would result in loss of greenspace to detriment of community (and wildlife). Concern with impact on health and wellbeing. concern this is just a tick box exercise | The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has indicatively identified the developable area within the St Fittick's Park site, which equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60). The proposal looks at quality of the burn and wetland as well as quantity. The masterplan shows that not all of St Fitticks park will be developed, but rather only the area immediately adjacent to the harbour equating to around 7 hectares. The environment, connectivity and community benefits, including a new play park, pump track and parklets identified as part of the marine gateway are all embedded within the | None |

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| | | | document highlighting their importance and requirement to be further considered. | |
| 258a | Individual/ Local Area | <p>Object to inclusion of St Fitticks – it is a well established greenspace particularly important for the low income community need this safe space.</p> <p>it is a refuge for animals and birds. There are also a variety of habitats including wetlands and woods.</p> <p>impact on people with disabilities with loss of accessible paths in the park, mitigation does not meet needs.</p> <p>Excess traffic will cause problems for peds and cyclists.</p> <p>Contrary to policies including NPF4.</p> | per 276-640 below | None |
| 259 | Individual/ Aberdeens hire | <p>Why not create access from top of Wellington Road through existing industrial area, instead of through Torry/Balnagask?</p> <p>Questions how 'just' and 'fair' the transition is for the local community given other alternatives to the loss of SFP appear plausible.</p> <p>Suggests the value of the investment is speculative at best.</p> | <p>The Masterplan relates to land allocated in the ALDP for an ETZ as set out in comment 1 response. The ETZ masterplan and the proposals will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Examples of this are evident in the Innovation and Skills Campuses.</p> <p>The Masterplan sets a framework for any planning applications as they come forward. The comment about the proposal being speculative is not for the masterplan to consider. This document sets principles for development to aid in any planning application process.</p> | None |

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| 259a | Individual | <p>Object to inclusion of OP56 St Fitticks</p> <p>why do Torry have to put up with all the pollution, lose greenspace for poisonous fumes and smells.</p> <p>removing the area destroys wildlife. The remaining marsh part is the worst part of the park that is being left. Green area needed for mental health.</p> <p>Use land at Tullos and Altens instead.</p> <p>contrary to national and local authority policy including NPF4 and the ALDP2023.</p> <p>Roads are already a hazard with pollution.</p> <p>Improved access to Tullos wood is not suitable compensation and parklets do not provide the same level of uses.</p> | <p>Per comment 1.</p> <p>Concerns of traffic and road congestion conflicts will all be considered as part of required assessments submitted with any planning application. The Masterplan sets out on page 167 the further assessments that are required for planning applications including an EIA, HIA and TIA.</p> <p>The ETZ will use vacant and redundant buildings and sites within industrial areas as well as the allocated greenfield land. Throughout the masterplan states that brownfield land will be utilised. Examples within the masterplan are evident in the Innovation and Skills Campuses.</p> <p>The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation.</p> | None |

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| | | | Detailed mitigation will be dealt with through the planning application process. | |
| 260 | Individual | <p>Object to development at St Fittick's Park and loss of Torry remaining green space. Torry always gets this type of development. There is little support provided for Torry compared to other more affluent areas.</p> <p>Leave the space that's left for the community to enjoy and use brownfield land at Altens instead.</p> | Per comment 3 | None |
| 261 | | Relates to the closure of Swimming pools and libraries and not the ETZ | Comments are not related to this proposal. | None |
| 262 | Individual/ Local Area | <p>The rezoning of St. Fittick's Park and Doonies farmland for industrial use may well have a negative impact on Burnbanks Village residents.</p> <p>There is an ongoing issue with traffic. Heavy lorries take these roads to avoid Wellington Road. Villagers suggested Hareness Road and Souterhead Road should be used instead.</p> <p>What are the plans for a field opposite Burnbanks Village?</p> <p>Concerned about the future impact on Burnbanks village and its residents.</p> | <p>per comment 3</p> <p>This level of detail is not required at Masterplanning stage. An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward.</p> <p>The requirements for such studies is identified within the Masterplan on page 167.</p> <p>The offshore wind campus is the campus closest to Burnbanks village but the plans (p115-126) show the existing tree belt between Burnbanks and the nearest use</p> | None |

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| | | | around 200m away. The existing industrial uses to the west are around 100m away. | |
| 263 | Individual | <p>Masterplan should be decided by Full Council, not Planning Committee.</p> <p>Greenspace valuable to public health, and the area is historically important. It is also ideal place for cruise line passengers to visit.</p> | <p>This report is for Council.</p> <p>A Health Impact Assessment is required as part of the planning application process.</p> | None |
| 264 | Business/ Historic Environment Scotland | <p>Reviewed document in relation to their main area of interest for the historic environment.</p> <p>Been involved in discussions throughout the development of this masterplan and commenting on various draft. welcome that, as a result of this engagement, our comments on aspects of the masterplan and how it relates to the historic environment have been acted upon with the plan updated accordingly. We therefore have no substantial comments to offer on the masterplan at this stage but would offer the following general comments.</p> <p>The aims and objectives of the masterplan in relation to the historic environment assets within the plan area recognise the need to consider and mitigate impacts on these resources that will come from development as part of the plan. Projects identified include works to mitigate the impacts of continuing development on the setting of the scheduled monument St Fittick's Church through delivery of landscape mitigation as well as targeted opportunities for repair, maintenance and enhanced interpretation and these are welcomed. The masterplan also explores interpretation and access opportunities around the</p> | <p>Comments noted, as a statutory consultee HES will be involved as proposals progress.</p> | None |

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| | | <p>historic environment assets in the wider area, notably the series of scheduled cairns on Tullos and Doonies Hill and we look forward to further discussion on these opportunities with all stakeholders as proposals progress.</p> <p>In terms of next steps we are aware that the Environmental Impact Assessment scoping consultation is currently under way for a Planning Permission in Principle (PPiP) application for the site. It will be important that the projects and approaches outlined in</p> | | |
| 265 | Business/ Network Rail | <p>Network Rail anticipates that the strategic role played by the railway and objectives and concerns of Network Rail will be considered in the ETZ.</p> <p>The railway at this location forms part of the proposed 'Aberdeen to Central Belt' (A2CB) project which seeks to decarbonise this part of the railway network. As part of these proposals, works are expected to three structures within the masterplan area, and the full railway line within the Energy Transition Zone would be electrified with overhead line equipment.</p> <p>Full Scope of project TBC for A2CB but expected to include:</p> <p>133/388 (NJ9641104445) 'Ness Occupation' Currently preferred for demolition</p> <p>133/387 (NJ9679403833) 'Coast Road' Currently preferred for parapet extensions on bridge</p> | <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> <p>Note the terminology re rail halt and freight yards.</p> | None |

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| | | <p>133/386 (NJ9659803395) 'Doonies' Currently preferred for re-decking of bridge.</p> <p>Timescale in Draft ETZ Masterplan (of 6-10 years) ties in with, but may be after, the A2CB upgrade. Benefits of project can help support masterplan achieve a sustainable, liveable and productive place in line with principles of NPF4</p> <p>Supports modal shift of passengers and freight towards railway.</p> <p>Network Rail structure 133/388 'Ness Occupation' is a private structure with no public right of way which is intended to be removed to allow electrification of the railway. A replacement structure will not be funded, but it would support Council in proposals for replacement bridge if 3rd party funding is available.</p> | | |
| | | <p><u>Freight</u></p> <p>Network Rail supportive of proposals to enhance freight provision in Aberdeen.</p> <p>Masterplan does not distinguish between freight yard to south of railway and bulk handling facility to the north. The northern one could handle more freight but is constrained by configuration, space and road access at present.</p> <p>A2CB route upgrade will be 'well-placed' to take advantage of freight facility to south of railway at Craiginches. Network Rail in discussions with Nestrans and AECOM over future aspirations for site which include expanded container facility for longer trains</p> | Comments noted. Terminology change required. | Ensure that the term 'rail halt' is removed and changed to 'freight yards' |

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| | | <p>and increased no. of movements. Significant road layout changes would be required.</p> <p>Potential for transportation of hydrogen by rail has been discussed with Nestrans and AECOM. Suitable infrastructure at freight site would be required with safety measures designed in. New safety protocols would also need to be developed prior to design/construction/operation.</p> | | |
| | | <p><u>Hydrogen Fuelling</u></p> <p>Fuelling closer to (or north of) Aberdeen Station would be preference if hydrogen fuelling pursued. However, battery power is also alternative to decarbonising rural trains.</p> | <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> | None |
| | | <p><u>Demolition and Realignment of OB 133/387 Coast Road</u></p> <p>Network Rail supportive of replacement of signalised railway bridge OB 133/387 Coast Road to address constraint issues.</p> | <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> | None |
| | | <p>Multi-Modal Connectivity</p> <p>Network Rail is supportive of the masterplan's commitment to the principle of multimodal connectivity.</p> <p>Walking should be primary way of accessing station and proposals should look to facilitate/integrate with this Aberdeen Station.</p> | <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|--------------------|-------------------------------------|---|---|--|
| | | <p>Changes to public realm in ETZ offer opportunity to encourage modal shift in transport. Network Rail committed to facilitating safe travel to and from stations via active means.</p> <p>Maximise potential of existing stations and new ones, and recognise their importance to communities in urban and rural areas as local hubs. All development within the Energy Transition Zone would be within 5km of Aberdeen Station so the potential for providing well-integrated active travel provision is high.</p> | | |
| | | <p>We are of the view that the STTS, which has been endorsed by SCOTS (Society of Chief Officers of Transportation in Scotland), will provide a useful guide for the development of sustainable travel infrastructure and we would be enthused to engage on this with Aberdeen City Council as proposals for specific sites within the Energy Transition Zone take shape.</p> | <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> <p>Comments noted and passed onto the design team to ensure compliance with any statements made in the masterplan.</p> | None |
| 266 and 266a | Torry Community Council | <p>Observations:</p> <p>1.1 . talks of how the plan could "directly uplift and empower the local community": the community overwhelmingly opposes any industrial development of OP56..</p> <p>Question how can loss of over 1/3 of a public park can increase amenity.</p> <p>2.4 The eventual use of the area will not be put to public consultation. This does not stipulate that no preparatory development of the site would happen in advance of, or to encourage, a particular development.</p> | <p>Per comment 3</p> <p>re 2.4 - Public involvement in the planning application process is key, which will include further assessments, studies and more detailed design to inform the process and allows the public to comment on detailed proposals.</p> <p>2.5 relates specifically to Aberdeen South Locality Planning Partnership that Torry is part of.</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|--|-------------------------------------|---|--|--|
| | | <p>2.5 The community is not mentioned as a partner in these partnership arrangements.</p> <p>Question why the exclusion of OP56 is not included here as an option.</p> <p>The representation included a statement from the Torry Community Council that was submitted to Full Council on 23.08.23. This has not been summarised here as it does not directly relate to the Masterplan public consultation.</p> | <p>OP56 is allocated in ALDP.</p> <p>The statement submitted to full council on 23.08.23 relates to the allocation of the site at St Fitticks. OP56 is allocated in ALDP.</p> | |
| | | <p>ETZ masterplan must go to full council.</p> <p>Re-zoning of St Fittick's Park was without public consultation and it changed the Trust's constitution so that a Council Officer could be delegated to sell/lease the land. When the constitution was changed (on 14th December 2022) there was a verbal agreement that any decision over the Lands of Torry would be made by Full Council. Also concerns over Council's conflict of interest.</p> <p>ETZ development of Opportunity Sites in Torry of 56 and 62 will be contrary to key policies in NPF4 regarding nature recovery and human wellbeing.</p> <p>Development would destroy existing plants/animals if Tullos Burn and wetland is moved. Habitat degradation and biodiversity loss due to new pollution, and air pollution would impact local residents.</p> | <p>This report is for full council.</p> <p>Per comment 3</p> <p>The ETZ is allocated in the ALDP per comment 1. The sale/lease of land is a separate matter and not relevant to the masterplan or the planning process.</p> <p>Consideration has been given to the siting of the development beside St Fittick's Church and Historic Environment Scotland and the Council's archaeologist have been involved throughout the process. Further assessments and consultation with HES will be required as part of the planning process. Furthermore traffic assessments and other</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|-----|-------------------------------------|--|---|--|
| | | <p>Loss of woodland and grassland is not adequately compensated by new planting or greenspace elsewhere and doesn't address air quality, loss of recreation opportunities for local residents, flood mitigation or visual amenity. New areas also less accessible.</p> <p>Detrimental impact on setting of Churchyard and St Fittick's Church (scheduled monument) due to re-routing of the Coast Road.</p> | relevant studies will be required as part of planning applications as they come forward. | |
| 267 | Torry Community Group | <p>Significantly objects to the proposal.</p> <p>Feels that Torry has already sacrificed green space to prior developments that were supposedly for the good of the area, yet none have delivered the jobs/prosperity promised. If land is so essential, why aren't the plans for it more specific?</p> <p>Development would result in loss of Greenspace and scientific studies show this can have negative impact on mental health.</p> <p>St Fittick's Park would most likely lose much of its biodiversity if developed which includes 42 species of breeding birds, 116 plant species and impact upon invertebrates and migratory birds.</p> <p>Development of St Fittick's Park is contrary to Council's own vision of retaining and improving existing Greenspaces.</p> | Per comment 3 | None |
| 268 | Individual/ Local Area | Objection to ETZ on sites 56 and 62 in Torry. | <p>Per comment 3</p> <p>Assessments will be required with planning applications that will take into consideration</p> | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|-----|-------------------------------------|--|--|--|
| | | <p>It would destroy large areas of grassland, woodland, ponds which provide habitat for existing plants and animals, and result in biodiversity loss.</p> <p>It would result in loss of open space for local community that supports healthy lifestyles and offers recreation opportunities. Loss further felt in addition to closure of Doonie's Farm.</p> <p>Increased air pollution will be caused by development as well as HGV traffic which already impacts Torry and Balnagask. Construction of incinerator may well also have negative impacts on health and welfare of locals and World Health Organisation (WHO) 'stated that it would have a huge negative impact on people's health - especially those living in the immediate vicinity of the incinerator'.</p> | <p>air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. The end uses have not been determined yet, this document sets parameters and principle for development.</p> | |
| 269 | Individual/ Local Area | Per 266 | Per 266 | None |
| 270 | Local Member | <p>Support the Energy Transition Zone in principle. This is because of our need as a City to pivot to renewable energy and remain a global player in the energy industry.</p> <p>Does not support building on St Fittick's Park (OP56).</p> <p>As a local Councillor I note the park is one of the few green spaces in Torry and its most substantial. Its loss would be detrimental to the community.</p> | Per comment 3. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | The community benefit package cannot make up for the potential loss of up to 1/3 of St Fittick's Park. | | |
| 271 | Individual/ | Object to development of St Fittick's Park for the ETZ, as outlined in the Draft Masterplan. The space is important to the community and they will be negatively impacted. The transition to sustainable energy should be led by the community. Remove Opportunity Site 56 in St Fittick's Park from the ETZ and amend the draft Masterplan accordingly. | Per comment 3 | None |
| 272 | NatureScot | Reviewed the masterplan in line with remit. Note the updates made and do not have any comments to add further to our previous responses as part of document preparation (see comments dated 18 May 2023 and 21 March 2023). | Comments noted and welcomed | No recommended changes |
| 273 | SEPA | SEPA has reviewed the Draft Energy Transition Zone Masterplan (April 2023 V8) and continues to consider that it should not be adopted as supplementary guidance. SEPA's comments on the previous draft Masterplan have not been addressed | The proposal is to adopt the document as Aberdeen Planning Guidance and not Supplementary Guidance. | None |
| | | It should be made clear what the 'masterplan' is & all references to indicative masterplans and illustrative concepts removed on key pages (eg page 97/98; 99/100; 113/114; 125/126) | The plans are indicative at this time as is always the case with Masterplans. The document notes that a number of assessments, studies and more detailed design work is required to development the proposals further. The document. The Masterplan sets principles and parameters that will be taken forward with any planning applications. The environment, | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | connectivity and community benefits, including a new play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered. | |
| | | We consider that one of the key principles to set out in a masterplan is the developable areas – and these should be shown as more than ‘indicative’ and reference to ‘reduced’ area should be removed; | The developable area is shown within the relevant plans such as St Fitticks on page 95. The reduced terminology related to the site is not the whole allocation that will be developed, | None |
| | | Any further assessments required should be carried out as part of the masterplan process | The more appropriate time for further survey and assessments is part of the planning application process and not here. | None |
| | | Consider the statement “Indicative floorspace ranges are derived from the illustrative layouts” is not justified at this stage and should be removed as further justification is required for the indicative GFA shown of 10,000 – 15,000 sqm for Zone A St Fitticks | The purpose of a Masterplan is to set principle and parameters for development. | None |
| | | The masterplan itself should reference the local plan requirement for OP56 in full - <i>Any development at this site must have a functional association with the South Harbour which precludes it being located elsewhere.</i> It should also consider how this will be addressed through a planning in principle application. | Comment noted | Update draft Masterplan accordingly |
| | | A detailed topographical survey should be completed and it be confirmed if the proposed East Tullos diversion is achievable; | This will be required as part of any planning application along with other assessments, studies and more detailed design. | None |
| | | A FRA should be carried out for OP56 and results incorporated into masterplan; | A FRA will be carried out as part of the planning application process and not the | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | Masterplanning process. This requirement for this is set out in the ALDP 2023 and will accompany any PPIP. | |
| | | All constraints to development should be clearly shown on the masterplan – including Scottish Water infrastructure referenced in text; | Agreed these could be shown clearly on a plan. | Update Masterplan to show technical constraint for St Fitticks. (P77 /78) |
| | | SUDS requirements should be identified on the masterplan within development site boundaries; | Indicative SUDs locations are shown on the plans such a p98 number 7 and page 125 number 6. The document makes it clear that “all development sites have full SUDs measures to treat/attenuate flows before discharge”. | None |
| | | Mitigation requirements including landscaping & buffer strips should be identified more clearly. (The illustrative concept page 8-1 shows landscaping (trees) in the East Tullos Burn & wetland area & in the burn diversion.) | Landscape plans and mitigation will be considered in detail as part of a planning application. Also per comment above surveys and assessments will also be required. A detailed landscape plan and scheme will be developed as part of the relevant planning applications when they come forward. A section has been added to the masterplan stating “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|-----|-------------------------------------|---|---|--|
| | | | required to ensure an overall <u>net gain</u> in tree cover” | |
| 274 | Individual | <p>Strongly object to inclusion of St Fittick’s Park within ETZ, and it must be protected in full.</p> <p>It would result in loss of haven for biodiversity and species and destroy rich habitat. Argues that ‘no net loss’ of biodiversity is a loss in real terms as areas lost cannot be replaced like-for-like and do not replace memories, cultural, social and historical significance associated with place. New habitats would require maintenance and cost-cutting would likely result in degradation of what was promised.</p> <p>Language within masterplan of how losses would be compensated is also vague and insufficient to justify loss of park.</p> <p>People of Torry disproportionately negatively affected by proposal as they are already some of the ‘economically poorest’. Their views have not been incorporated into Masterplan, and their views and needs have not been heeded in consultation process.</p> <p>Evidence suggests port space required to service the construction of off-shore wind farms will significantly reduce by 2035, therefore permanent loss of existing irreplaceable habitat will be for shorter-term need.</p> | <p>Per comment 3</p> <p>The Community and Energy Coast chapter of the Masterplan considers the East Tullos Burn and wetlands (p59 and 60), St Fittick’s Park and the projects that will be brought forward in this area, to the benefit of the community, are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements including pollinator coast, habitat management and development landscaping.</p> <p>Detailed mitigation measures and their delivery would be determined via the planning application process.</p> <p>There have been a number of consultation exercises consulting the community, including this 8 week one.</p> <p>The future requirement for this area is not for the masterplan to consider.</p> | None |
| 275 | Individual | Acknowledges importance for Aberdeen to reinvent itself as a sustainable energy capital and highlights the importance of | Per comment 3. | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>sustainable development in supporting both communities and the environment.</p> <p>Impacts to St Fitticks are significant, concern the community will not reap many benefits. Mitigation measures do not address concerns expressed by the community.</p> <p>Masterplan does not reflect a Just Transition or Sustainable Development.</p> <p>Concern for disadvantaged communities accessing greenspace, particularly important considering the impact of local greenspaces on community wellbeing during the pandemic.</p> <p>Concern that the benefits of critical ecosystems in St Fitticks Park, experienced by the locals, is not fully reflected in the masterplan (such as clean water, protection from floods, local biodiversity, carbon sequestration, education, sense of place, recreation and mental and physical health impacts). Mitigation measures are inadequate and are based on poor evidence. Redirection and positioning of the wetland (p28) next to an industrial facility and road would nullify its potential benefits. The same can be said for the adjoining restored woodland.</p> <p>Proposed 'biodiversity swap' through improved access to Tullos Hill to compensate loss of space in St Fitticks does not account for the change in different ecosystems, and the services provided. The differing natures of these areas makes them not swappable.</p> | <p>The site is allocated in the ALDP and the allocation sets out a requirement to identify preventative and remediative measures, all of which will be fully considered as part of the planning application process.</p> <p>there will still be an area of greenspace available with enhanced play facilities, improved access and improved quality of wetland.</p> <p>The ETZ is allocated within the ALDP and the principle of development established through this [process and set out in comment 3. The masterplan takes that principle of development and considers the area as a whole and identifies developable area, proposals, access etc. Further studies and assessments will be required as part of the planning application process and will be determined in more detail, mitigation, landscaping etc.</p> <p>The area of Donnies was assessed and allocated through the ALDP process and allocated for development per comment 3 response.</p> <p>Finally the ETZ masterplan will also utilise</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | <p>Could lead to increased inequalities experienced by locals accessing Tullos Hill due to mobility issues, and results in giving them access to a hilly environment rather than flat ground. Supports efforts to restore Tullos Hill, but should not be used to substitute loss of St Fitticks Park.</p> <p>Objects to the development of Doonies (OP61).</p> <p>Masterplan does not fully reflect benefits of Doonies, which is a site of local significance, where access to rural areas is limited.</p> <p>Mitigation measures are inadequate and fail to provide comparable benefits. Concern this will deepen inequalities as locals will lose more than there is to gain.</p> <p>Concern that the decarbonisation agenda cannot progress in isolation of biodiversity conservation or social justice. Urges decision makers to rethink and work directly with the affected community</p> <p>Argues there are options that have not been considered, e.g. identification of areas of existing and vacant brownfield sites - of which there are many in the city.</p> | vacant brownfield land at Tullos and Altens for development. | |
| 276 to 640 | 365 emails –received with the standard text shown in the next column. | Object to the proposed development of Opportunity Site 56 in St Fittick's Park for the following re: | Per comment 3 the site is allocated in the ALDP This area as per the ALDP allocation must have a functional association with the South Harbour that precludes it being located elsewhere, such as the size of the infrastructure preventing transport from | None |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | other locations or requiring roll on/roll off level access to the harbour. | |
| | | will negatively impact environmental health due to increased levels of air, noise and light pollution associated with further industrial development near a residential area. These impacts will be experienced by and have a detrimental effect on a community with significant health outcome disparities compared to other parts of Aberdeen (13 years lower life expectancy, 20 years lower healthy life expectancy) | Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. The end uses have not been determined yet, this document sets parameters and principles for development. | None |
| | | will negatively impact the natural environment due to proposed relocation/ destruction of the existing East Tullos Burn wetland, grasslands and woodland habitats and the diminished quality of what remains of the park | The Masterplan relates to land allocated in the ALDP for an ETZ. The masterplan has identified the developable area within the St Fittick's site, which equates to around 1/3 of it. The Masterplan also clearly sets out mitigation projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60). The proposal looks at quality of the burn and wetland as well as quantity. | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | St Fittick's park and the projects that will be brought forward in this area, to the benefit of the community are shown on pages 61-64. Biodiversity protection and enhancement are also considered on pages 65-66 with suggested improvements' including pollinator coast, habitat management and development landscaping | |
| | | will be contrary to current national and local authority planning policy including Scotland's NPF4 Policy 23: Health and Safety (sections b, d, e, g and h) which seeks to protect people and places from environmental harm and Aberdeen Local Development Plan 2023 Policy WB1 Healthy Development, WB2 Air Quality, WB3 Noise, NE2 Green and Blue Infrastructure (particularly urban green spaces), NE4 Flood Risk and Management, NE5 Trees and Woodland, D3 Big Buildings (proposed high-value manufacturing facility is 10-15 m high), D4 Landscape, D6 Historic Environment and R2 Degraded Land (the wetland acts as a sink for organic and inorganic contaminants) | Per comment 3 the site is allocated in the ALDP. The Masterplan relates to land allocated in the ALDP for an ETZ. Throughout the document national, regional and local policies have been considered and assessed. The masterplan looks at policy topics such as improvements to biodiversity, active travel, health and wellbeing, historic environment, safety, reuse of brownfield land, job opportunities and upskilling, and at the forefront of the ETZ, the move to net zero and climate mitigation and adaptation. Subsequent planning applications will be assessed against relevant ADLP policies. | |
| | | will have a negative impact on the amenity of the surrounding residential area due to loss of parkland and replacement of existing green spaces with heavy manufacturing and harbourside development | The Masterplan sets principles and parameters that will be taken forward with any planning applications. The Masterplan illustrates the location and area of | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|--|-------------------------------------|--|--|--|
| | | | <p>landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood. A section has also been added to the Masterplan stating: “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover”</p> <p>The end uses have not been determined yet, this document sets parameters and principle for development. Amenity will be assessed as part of any planning application.</p> | |
| | | <p>will cause traffic congestion, access, and safety problems for residents and those using coast paths and other active travel routes due to increased HGV and other vehicular traffic associated with heavy manufacturing and harbourside development and potential conflicts with pedestrians, cyclists and public transportation users from nearby residential areas and users of coastal path network</p> | <p>An assessment of traffic and transport impacts and other relevant studies will be required as part of planning applications as they come forward.</p> <p>The requirement for such studies is identified within the Masterplan on page 167.</p> <p>Each campus has a section on Transport and Connectivity shown the importance of this issue(p84, p108, p122, p123, p144). Furthermore p 152 – 154 relates specifically to road infrastructure and how the ETZ</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | relates to other existing and committed projects including the Aberdeen South Harbour Link Road. | |
| | | will create a precedent for future similar proposals in Torry, making it difficult to object to further industrial development due to the history of industrial expansion in the area, particularly by the Port of Aberdeen whose long-term plans include further industrialisation around the South Harbour | The Masterplan reflects the ALDP development allocations and does not consider future expansion. Every application is considered on its own merits. The sites are allocated in the ALDP and will be assessed against the requirements of this and other relevant legislation and material planning considerations. | |
| | | will adversely impact a Scheduled National Monument and Commonwealth War Grave site due to the proximity of the re-routed Coast Road to the site of St Fittick's Church | Consideration has been given to the siting of the development beside St Fittick's Church and Historic Environment Scotland and the Council's archaeologists have been involved throughout the process. Further assessments and consultation with HES will be required as part of the planning process. | |
| | | <p>result in the loss of public amenities, such as green space and recreational grounds due to the destruction of woodland, including walking paths, and open grassland areas, including a large playing field</p> <p>cannot compensate for the loss of the above, as claimed in the Masterplan because there are no other comparable accessible green areas in Torry. Proposed improved access to Tullos Wood is not suitable compensation as this requires lengthy pedestrian travel through an industrial estate. Tullos Wood is still a managed</p> | The plan on page 71 shows how the connections can be made via an underpass to the west. This said in ould be helpful to have a plan showing the indicative path improvements within the sites and the wider connections to the network beyond. It should be noted that at this time the final path locations have not been determined and this would be part of a planning application process, but the requirement for | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | landfill site, containing methane venting zones and does not provide access for disabled users. Proposed local parklets do not provide for the same range of uses as the existing park. | <p>their retention and enhancement has been identified.</p> <p>The Masterplan relates to land allocated in the ALDP for an ETZ. The Masterplan sets principles and parameters that will be taken forward with any planning applications. The masterplan shows that not all of St Fitticks park will be developed, but rather only the area immediately adjacent to the harbour equating to around 7 hectares. The environment, connectivity and community benefits, including a new play park, pump park and parklets identified as part of the marine gateway are all embedded within the document highlighting their importance and requirement to be further considered.</p> <p>The masterplan has identified the developable area within the St Fittick's site, which is not the whole of the site and equates to around 1/3 of it. The Masterplan also clearly sets out projects (p64-66) as well as proposals and opportunities with the area (p73-98), including pollinator coast, local species planting, habitat management, and as identified by SEPA the need to improve water quality of the burn (p59 and 60).</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|--|-------------------------------------|----------|---|--|
| | | | <p>Further assessments such as an EIA are required with any planning application.</p> <p>The Masterplan illustrates the location and area of landscaping that will be removed and replaced. Replacement planting will include native species and will extend woodland cover, particularly within the Tullos Wood. A section has also been added to the Masterplan stating: “development proposals must increase tree and woodland cover, and where tree removal takes place replacement planting will be required to ensure an overall <u>net gain</u> in tree cover</p> <p>The proposal includes improved access through St Fittick’s Park to Tullos Hill. It is noted that the bridge will be removed but this is a consequence of a separate project to electrify the main east coast rail line and upgrade the Coast Road and is consequently under the control of Network Rail. Careful consideration will be given to allowing improved access for all through the assessment of planning applications. Further path networks and improvements are shown for each area but in particular on the Marine Gateway. Though part of the site</p> | |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
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| | | | will be developed, there will be an extensive path network still available. | |
| | | will impose additional sources of pollution on top of those already present (waste treatment plant, incinerator, landfill sites) which causes a cumulative negative effect on local health outcomes | Assessments will be required with planning applications that will take into consideration air quality, odours, and a health impact assessment. The specific final uses of the different areas are unknown so cannot be assessed at this time. A Health Impact Assessment will be provided as part of the planning application process. | |
| | | will adversely affect the needs of people with disabilities due to the loss and diminution of quality of accessible and inclusive existing pathways in the park. The proposed mitigation and compensation will not meet the needs of elderly and disabled residents of Brimmond Court | There is still a network of paths available within St Fitticks park. | |
| | | For the reasons outlined above, I ask that you remove Opportunity Site 56 in St Fittick's Park from the ETZ and amend the draft Masterplan accordingly. | Per comment 3. | |
| | Other | Finally, a small number of other technical updates and clarifications have been incorporated, where necessary, to reflect changes in circumstances since the draft ETZ Masterplan was developed, such as the adoption of the LDP and NPF4. | Other minor corrections / updates included are: <ul style="list-style-type: none"> - Reference to adopted LDP (2023) throughout – particularly pg. 23-24 - Reference to bp Aberdeen Hydrogen Energy Ltd consent granted June 2023. | List them |

| | Company/ Individual/ Location | Comments | Response | Recommended changes to Draft ETZ Masterplan |
|--|-------------------------------------|----------|--|--|
| | | | <ul style="list-style-type: none"> - Reference to opening of the Torry Community Hub in November 2023, on pg. 44. - Reference to EISH / Skills Hub planning application within relevant planning context sections for those Campuses. - Corrected reference to Balnagask Golf Course, rather than Nigg Bay Golf Club. - Corrected / updated operational status of South Harbour and EfW facility. - Updated image on pgs. 29-30 and pg. 78 to more recent images of Park / Harbour / Coastline (previous images were from 2021 / early 2022). - Minor amendments to remove reference to 'invasive' or 'non-native' species, have referred to overgrown typha / grasses where relevant. | |

HABITATS REGULATIONS APPRAISAL PROFORMA

A: SCREENING

1. Name of Competent Authority

Aberdeen City Council

Note: Refer to NatureScot HRA Guidance whilst completing the HRA, this template only contains basic pointers for the completion of this document, further Guidance should be referred to for detail;

- *If you would like more information on the terms used in this template, see the EU guidance document [here](#), pages 33-52*
- *When producing a plan or strategy, use this [guidance](#) from NatureScot*
- *For projects where work is taking place on the ground, this [guidance](#) from NatureScot may be more useful*
- *For all cases, reference **must** also be made to the following additional [guidance note](#) from NatureScot*
- *[SiteLink](#) provides access to data and information on key [Protected Areas](#) across Scotland. You can view site boundaries, designated features and download supporting documents.*

Note: Refer to Local Development Plan (LDP) HRA before progressing when assessing development within an Opportunity Site identified through the LDP.

2. SITE DETAILS

2a. Name of European site affected

The below lists the European and UK designated sites within the potential zone of influence (ZOI) which were considered and the qualifying interest features are outlined below in Section 2b.

- 1. River Dee SAC**
EU Site Code: UK0030251 Designated: 17 March 2005 Area: 2334.48 ha
- 2. Moray Firth SAC**
EU Site Code: UK0019808 Designated: 17 March 2005 Area: 151273.98 ha
- 3. The Ythan Estuary, Sands of Forvie and Meikle Loch SPA**
EU Site Code: UK9002221 Designated: 03 December 2020 Area: 7062.03 ha
- 4. Loch of Skene SPA**
EU Site Code: UK9002261 Designated: 01 Oct 1986 Area: 121.76 ha
- 5. Buchan Ness to Collieston Coast SPA**
EU Site Code: UK9002491 Designated: 25 Sep 2009 Area: 5400.76 ha

HABITATS REGULATIONS APPRAISAL PROFORMA

6. Isle of May SAC (Grey seal)

EU Site Code: UK0030172 Designated: 17 Mar 2005 Area: 356.64 ha

7. Berwickshire and North Northumberland Coast SAC (Grey seal)

EU Site Code: UK0017072 Designated: 17 Mar 2005 Area: 65226.12 ha

It is recognised that the above list contains sites which are more than 2km distance away from the Masterplan area. However, there is no maximum distance specified in defining a 'Zone of Influence' and therefore additional SPAs and SACs have been identified for the purposes of this habitats appraisal. Such sites have been identified as being within the potential ZOI as their designations include mobile species, which may be on a flightpath, utilise supporting habitats on or near the site, and/or are hydrologically connected to the site. For example, the common tern which is a qualifying species at the Ythan Estuary, Sands of Forvie and Meikle Loch SPA typically forages up to 5–10 km (3.1–6.2 mi) away from the breeding colony, sometimes as far as 15 km (9.3 mi). Given the proximity of the Masterplan area to the coast determines that other sites with marine based attributes and qualifying interested should also be considered.

2b. European qualifying interest(s)

Site / Qualifying Interest / Condition

1. **River Dee SAC: Otter** *Lutra lutra* (Favourable Declining); **Freshwater pearl mussel** *Margaritifera margaritifera* (Unfavourable No Change); **Atlantic salmon** *Salmo salar* (Favourable Maintained)
2. **Moray Firth SAC: Bottlenose dolphin** *Tursiops truncatus* (Favourable Maintained)
3. **Ythan Estuary, Sands of Forvie and Meikle Loch SPA: Sandwich tern** *Sterna sandvicensis* (Favourable Maintained); **Common tern** *Sterna hirundo* (Unfavourable No Change); **Little tern** *Sterna albifrons* (Favourable Maintained); **Pink-footed goose** *Anser brachyrhynchus* (Favourable Maintained); **Common eider** *Somateria mollissima mollissima* (Favourable Declining); **Lapwing** *Vanellus vanellus* (Favourable Maintained); **Redshank** *Tringa tetanus* (Favourable Maintained); **Non-breeding waterbird assemblage** (Favourable Maintained).
4. **Loch of Skene SPA: Goldeneye** *Bucephala clangula* (Favourable Maintained); **Goosander** *Mergus merganser* (Unfavourable Declining); **Greylag goose** *Anser anser* (Unfavourable Declining).
5. **Buchan Ness to Collieston Coast SPA: Fulmar** *Fulmarus glacialis* (Unfavourable Declining); **Guillemot** *Uria aalge* (Favourable Maintained); **Herring gull** *Larus argentatus* (Favourable Maintained); **Kittiwake** *Rissa tridactyla* (Unfavourable No change); **Shag** *Phalacrocorax aristotelis* (Unfavourable No change); **Seabird assemblage** (Favourable Recovered).
6. **Isle of May SAC: Grey seal** *Halichoerus grypus* (Favourable Maintained).
7. **Berwickshire and North Northumberland Coast SAC: Grey seal** *Halichoerus grypus* (Favourable Maintained).

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2c. Conservation objectives for qualifying interests

The following outlines both the conservation objectives for the qualifying interests of the sites, alongside factors influencing the site and vulnerabilities to changes/potential effects

1. River Dee SAC

- To ensure that the qualifying features (Freshwater pearl mussel, Atlantic salmon and otter) of the River Dee SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.
- To ensure that the integrity of the River Dee SAC is restored by meeting objectives 2a, 2b, 2c for each qualifying feature (and 2d for freshwater pearl mussel):
 - 2a - Restore the population of the qualifying feature species as a viable component of the site.
 - 2b - Restore the distribution of the qualifying feature species throughout the site.
 - 2c - Restore the habitats supporting the qualifying feature species within the site and availability of food.
 - 2d - Maintain the distribution and viability of freshwater pearl mussel host species and their supporting habitats.
- Factors Influencing Site and Vulnerability to Changes / Potential Effects
 - River engineering works
 - Habitat loss
 - Disturbance
 - Recreational impacts
 - Coastal squeeze
 - Water abstraction
 - Pollution Housing developments

2. Moray Firth SAC

- To ensure that the qualifying features (e.g. bottlenose dolphin and subtidal sandbanks) of Moray Firth SAC are in favourable condition and make an appropriate contribution to achieving Favourable Conservation Status.
- To ensure that the integrity of Moray Firth SAC is maintained or restored in the context of environmental changes by meeting objectives 2a, 2b and 2c for each qualifying feature:
 - For subtidal sandbanks
 - 2a - Extent and distribution of the habitat within the site.
 - 2b - Structure and function of the habitat and the supporting environment on which it relies.
 - 2c - Distribution and viability of typical species of the habitat.
 - For bottlenose dolphin
 - 2a - The population of the bottlenose dolphin is a viable component of the site.
 - 2b - The distribution of bottlenose dolphin throughout the site is maintained by avoiding significant disturbance.

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| <ul style="list-style-type: none"> - 2c - The supporting habitats and processes relevant to bottlenose dolphin and the availability of prey for bottlenose dolphin are maintained. <ul style="list-style-type: none"> • Factors Influencing Site and Vulnerability to Changes / Potential Effects <ul style="list-style-type: none"> - Dolphin watching - Disturbance - Harassment - Contamination - Death and injury - Potential poaching - Recreational impact - Reduction of food availability - Unviable population levels <p>3. Ythan Estuary, Sands of Forvie and Meikle Loch SPA</p> <ul style="list-style-type: none"> • To ensure that the qualifying features of Ythan Estuary, Sands of Forvie and Meikle Loch SPA are in favourable condition and make an appropriate contribution to achieving Favourable Conservation Status. • To ensure that the integrity of Ythan Estuary, Sand of Forvie and Meikle Loch SPA is restored in the context of environmental; changes by meeting objectives 2a, 2b and 2c for each qualifying feature: <ul style="list-style-type: none"> - 2a - The population of the qualifying features are viable components of the site. - 2b - The distribution of the qualifying features throughout the site are maintained by avoiding significant disturbance of the species. - 2c - The supporting habitats and processes relevant to the qualifying features and their prey/food resources are maintained, or where appropriate, restored. • Factors Influencing Site and Vulnerability to Changes / Potential Effects <ul style="list-style-type: none"> - Tourism / Leisure / Recreation - Onshore Wind & Micro-renewables - Development pressures on and/or edges of site - Damage and disturbance to sensitive habitats and species. - Predation - Overtopping of shingle beds by sand - Eutrophication and threats to invertebrates from algal mats - Long term threats from climate change and sea level rise <p>4. Loch of Skene SPA</p> <ul style="list-style-type: none"> • To avoid deterioration of the habitats of the qualifying species (Greylag goose, Goldeneye and Goosander) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and • To ensure for the qualifying species that the following are maintained in the long term: <ul style="list-style-type: none"> - Population of the species as a viable component of the site - Distribution of the species within site - Distribution and extent of habitats supporting the species - Structure, function and supporting processes of habitats supporting the species - No significant disturbance of the species |
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- Factors Influencing Site and Vulnerability to Changes / Potential Effects
 - Off-shore wind
 - Tourism / Leisure impacts
 - Recreational pressures & maintenance of visitor numbers
 - Disturbance
 - Affects to mobile species
 - Impact on water quality
 - Pollution
 - Long term threats from fisheries and climate change
- 5. Buchan Ness to Collieston Coast SPA**
- To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and;
 - To ensure for the qualifying species that the following are maintained in the long term:
 - Population of the species as a viable component of the site
 - Distribution of the species within site
 - Distribution and extent of habitats supporting the species
 - Structure, function and supporting processes of habitats supporting the species
 - No significant disturbance of the species
 - Factors Influencing Site and Vulnerability to Changes / Potential Effects
 - Pollution
 - Disturbance
 - Development pressures
 - Habitat loss/destruction
 - Affects to mobile species
 - Impact on water quality
 - Pollution
 - Recreational activities
 - Long term threats from overfishing, fisheries, climate change and sea level rise
- 6. Isle of May SAC (Grey seal)**
- To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and
 - To ensure for the qualifying species that the following are maintained in the long term:
 - Population of the species as a viable component of the site
 - Distribution of the species within site
 - Distribution and extent of habitats supporting the species
 - Structure, function and supporting processes of habitats supporting the species
 - No significant disturbance of the species
 - Factors Influencing Site and Vulnerability to Changes / Potential Effects
 - Recreational pressure

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- Tourism / Leisure
- Managing visitor numbers and boat landings
- Disturbance to breeding season and prey
- Habitat modification
- Offshore wind farm
- Maritime activities (collisions)
- Impact on water quality
- Tele-communications
- Harbour infrastructure

7. Berwickshire and North Northumberland Coast SAC (Grey seal)

- To avoid deterioration of the habitats of the qualifying species (listed below) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and
- To ensure for the qualifying species that the following are maintained in the long term:
 - Population of the species as a viable component of the site
 - Distribution of the species within site
 - Distribution and extent of habitats supporting the species
 - Structure, function and supporting processes of habitats supporting the species
 - No significant disturbance of the species
- Factors Influencing Site and Vulnerability to Changes / Potential Effects
 - Recreational pressure
 - Tourism / Leisure
 - Disturbance
 - Habitat loss
 - Offshore wind farm
 - Maritime activities
 - Impact on water quality
 - Infrastructure

8. PROPOSAL DETAILS

3a. Proposal Title

Energy Transition Zone (ETZ) Masterplan

3b. Details of proposal for both the construction (if relevant) and operational phase(s)

The **Aberdeen Local Development Plan (ALDP) 2023** was adopted on 19 June 2023. The ALDP 2023 contains Policy B5 (Energy Transition Zone) which identifies areas of land for development of an 'Energy Transition Zone', as well as specific 'Opportunity Sites' OP56 (St Fittick's Park), OP61 (Doonies) and OP62 (Bay of Nigg / Gregness) at and around Aberdeen South Harbour. The ALDP

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2023 sets out that OP56 and OP61 will support renewable energy transition related industries in association with Aberdeen South Harbour while OP62 relates to the Aberdeen Harbour expansion. The Local Development Plan also highlights the need for a joint Masterplan for all three Opportunity Sites – please see **Figure 1** below.

The ALDP further states that the **Energy Transition Zone** will support renewable energy transition related industries in association with Aberdeen South Harbour. Any development at the OP56 site must have a functional association with the South Harbour which precludes it being located elsewhere, such as the size of the infrastructure preventing transport from other locations or requiring ‘roll on / roll off’ level access to the South Harbour. Appropriate environmental assessments will be required, including a Habitats Regulations Appraisal to accompany development proposals in order to avoid adverse effects on the qualifying interests of a range of Natura sites. A Flood Risk Assessment is required. Other issues which need to be addressed include water quality, recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas. Joint Masterplan needed for OP56, OP61 and OP62.

To articulate ETZ Ltd.’s vision and objectives into a spatial framework, a masterplan for the Energy Transition Zone (ETZ) has been developed in line with Aberdeen City Council’s ‘Placemaking Process’ (formerly known as the ‘Masterplanning Process’).

The **Energy Transition Zone (ETZ) Masterplan** has been prepared by a consultant team on behalf of ETZ Ltd. A copy of the full ETZ Masterplan can be found in **Appendix 2**, however in broad terms the ETZ Masterplan has been prepared to provide a spatial framework for development across a wide area encompassing Aberdeen South Harbour, proposed ALDP ‘Opportunity Sites’ for Energy Transition Zone development, brownfield land within East Tullos and Altens, road and other infrastructures, areas of green and open space, and communities in Torry and Cove. It provides the basis for future development of energy transition industries, skills, innovation and investment in manufacturing. It also includes the delivery of wider benefits in terms of job-creation, place-making, and the local environment. It has been prepared in consultation with a wide range of statutory and non-statutory stakeholders and following an extensive period of local engagement including three community consultation events held in Torry and hosted by ETZ Ltd., and a period of 8 week Council-ran public consultation exercise. The Masterplan is structured around the development of a ‘campus model’, as outlined below and in **Figure 2**.

- *Community & Energy Coast* – a programme of investment in local greenspace, biodiversity, and community infrastructures to deliver tangible local benefits across the area.
- *Marine Gateway* – a hub of high-value manufacturing and port-integrated activity forming a catalyst for wider investment across ETZ – sited at Aberdeen South Harbour and a reduced development area within the OP56 Opportunity Site at St Fittick’s.
- *Hydrogen Campus* – a specialist Campus for manufacturing, R&D, and test & demonstration of hydrogen technologies, strengthening Aberdeen’s position as a sector leader – sited at the OP61 Opportunity Site (Doonies) and adjacent brownfield land for future expansion.
- *Offshore Wind Campus* – a cluster of manufacturing, supply-chain, R&D, and test & demonstration activity for offshore wind and wider energy transition uses – sited in Altens.
- *Innovation Campus* – a purpose-developed mix of flexible industrial and commercial units for innovative start-up and growing energy transition businesses – sited in Altens.

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- *Skills Campus* – a new net zero education & training facility to accelerate the next generation of energy skills and knowledge and support delivery of ETZ Jobs & Skills Plan – sited in Altens.

A Planning Permission in Principle application will also be submitted for development in Zones A , B and C over a total area of 34.99ha which includes land within the three areas of land allocated as OP56 (St Fittick’s Park), OP61 (Doonies) and OP62 (Bay of Nigg / Gregness) – please see **Figure 3 below**.

Overall, the proposals are for a range of flexible development within Class 4, 5, and 6 across three zones with associated infrastructure, active travel connections, landscaping, environmental works, utilities, services drainage and other ancillary works. Whilst it is recognised that the Masterplan is at a strategic level and the details of the proposed development are still being planned and developed, for the purposes of this HRA the development is expected to comprise of the following:

- Buildings in a combination of Class 4 (Business), Class 5 (General Industrial), and Class 6 (Storage & Distribution uses), suitable for a range of energy transition activities, across a range of serviced development plots.
- Provision of road infrastructure including creation of new road links, connected to the Coast Road.
- Retention and partial re-alignment of a section of the East Tullos Burn in order to enable formation of development plots, supporting renewable energy transition related industries in association with Aberdeen South Harbour.
- Active travel measures including integration of existing Core Path networks and provision of new and enhanced path connections.
- Measures to protect and enhance the local environment and biodiversity within and around areas of development through buffer zones, boundary treatment, development plot landscaping, tree and pollinator planting, and other blue-green infrastructures.
- External areas within development plots for parking, servicing, and storage.
- Associated infrastructure including SUDS, utilities and other ancillary works.

The surrounding area accommodates a range of land uses and features including locally important environmental and biodiversity features. This includes Local Nature Conservation Sites at Balnagask-Cove Coast (within which the site is partially situated), and Tullos Hill. Nigg Bay has a geological Site of Special Scientific Interest (SSSI) at its southern edge, bordering the Zone B (Gregness) part of the site.

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Figure 1 – Aberdeen Local Development Plan 2023: Extract from Proposals Map

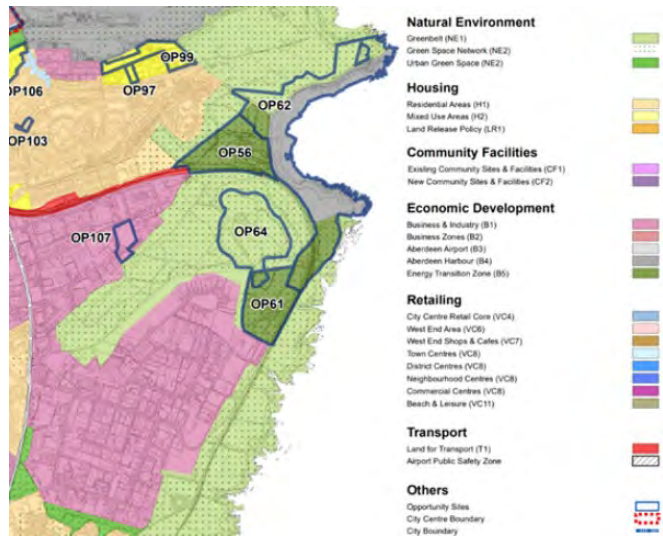


Figure 2. ETZ Masterplan Campus Model



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Figure 3. Location and extent of ETZ Development Zones, A, B and C



4. Is the proposal directly connected with or necessary to the nature conservation management of a European site?

No

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5. Is the proposal (either alone or in combination) likely to have a significant effect (LSE) on a European site?

YES – both for construction and operational phase, and in combination with other proposals in the south-east of Aberdeen, in particular the Aberdeen Harbour South (Port of Aberdeen); Aberdeen South Harbour Link Road (ASHLR), and other road infrastructure and development/land pressures from allocations of the ALDP and neighbouring authorities LDPs.

ALDP 2023 HRA Requirements

Policies B4 (Aberdeen Harbours) and B5 (Energy Transition Zone) were initially screened-in as part of this assessment as they outlined a presumption in favour of certain types of development within harbour-related areas, and depending on the specific nature of the development projects coming forward, there may be an impact on qualifying interests. The key issues identified were:

- Possible water abstraction and construction related impacts on qualifying interests of the River Dee SAC.
- Possible loss of foraging habitat impacts on SPA geese of Ythan Estuary, Sands of Forvie and Meikle Loch SPA, and Loch of Skene SPA.
- Possible impacts on eider (non-breeding) as a qualifying interest of Ythan Estuary, Sands of Forvie and Meikle Loch SPA through loss of supporting and foraging habitats or to water quality.

Appendix 1 contains a full itemised screening of the Draft Energy Transition Zone Masterplan (July 2023) for aspects which would have a likely significant effect on the aforementioned qualifying interests. The methodology used lists and assesses the vision, objectives, principles, policies and projects contained in the masterplan to determine whether it should be screened in or out.

Features of the Masterplan Screened In

(please read alongside **Appendix 1**)

| | Masterplan Reference | Screened In |
|---|---|---|
| 1 | 4.1 Community & Energy Coast | |
| | East Tullos Burn & Wetlands | In – water quality |
| | St Fittick’s Park, Greenspace & Green Networks | In – water quality / increased pressure from development / access / use |
| 2 | 4.2 Marine Gateway (Opportunities & Constraints; Development Guidance) | |
| | Opportunities & Constraints: St Fittick’s Park & Aberdeen South Harbour | In – direct harbour / port access impacts / road construction |
| | Land Use | In – land development pressures |
| | Infrastructure | In – outfall to Nigg Bay retained / potential transference |
| | Landscape & Environment | In – loss of green and natural spaces / changes to water quality |
| 3 | St Fittick’s Park Preventative and Remediative Measures and Gregness Preventative and Remediative Measures | |
| | East Tullos Burn & Wetlands | In – hydrology / ecology |
| | Park, Greenspace & Green Networks | In – potential impacts on supporting coastal habitats |

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| | Indicative Masterplan (illustrative concept) | In – potential impacts on supporting coastal habitats |
| 4 | 4.3 Hydrogen Campus (Development Guidance) | |
| | Land Use | In – potential impacts on supporting coastal habitats |
| | Transport & Connectivity | In – potential disturbance / increased accessibility |
| | Landscape & Environment | In – loss of green and natural spaces / supporting habitats |
| | Indicative Masterplan illustrative concept) | In – potential impacts on supporting coastal habitats |

Summary of Potential Impacts of the Masterplan Features Screened In:

1. The River Dee SAC estuary is located at the existing Aberdeen Harbour and lies to the north of the Aberdeen South Harbour/Energy Transition Zone area. It is possible that Atlantic salmon might be impacted by construction related underwater noise.
2. While freshwater pearl mussel are not be present within Aberdeen Harbour or Nigg Bay, any impact upon migrating Atlantic salmon through the existing harbour or Nigg Bay could theoretically in turn affect Freshwater pearl mussels and Otters present in the Dee.
3. Removal and potential loss of supporting habitats for a range of species if grassland, wetlands, and coastal habitats are to be adversely impacted by proposed development – which could reduce foraging, feeding and/or breeding grounds and prevent or reduce the potential for species recovery at the identified sites.
4. Species disturbance or potential loss from the geographical area as a result of development impacts (both construction and operational phases) including noise, vibration, lighting, surface run-off, pollution and impacts on water quality and hydrology.
5. Potential for disturbance to aquatic and marine environment species to be impacted upon by development close to the coast and tide line, through noise transmission and/or impacts on water quality in terms of discharges and transference.
6. Enhanced access to the area will increase the use of the coastal area and create recreational pressures, causing potential disturbance to a range of species through noise, pollution, and physical interference such as through coastal path erosion and damage to habitats.
7. Spread of invasive non-native species through inappropriate planting.
8. Potential impacts on species through accidental pollution events associated with the development (both construction and operational phases), and/or through potential increase in pollutants adversely impacting on air/water quality.
9. Effects on aquatic environment and/or mobile species from loss of supporting habitats due to increase in amount of development and development affecting the coast (including areas vulnerable to recreational pressure).
10. Increased impacts from water abstraction and poor/unsustainable water management use and practices.
11. Potential vulnerabilities to grey seal include: underwater noise from construction with potential to result in disturbance, injury and death; vessel movements causing disturbance and possible risk of injury from collision; reduction in water quality which could be directly harmful to seals or impair their foraging; and impacts upon the seals' prey species.

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Features Screened Out

Aspects of the Masterplan are screened out on the basis of the following justification (*please read alongside Appendix 1*):

- *General policy / background info* – They are general policy statements or provide background information;
- *Too general with no info on where, how and when of development* – It is not possible to identify effects on any particular European site because proposals/policies are too general;
- *Preventive, enhancement and conservation policy* – They are elements of the Masterplan that are intended to protect the natural environment;
- *Not generated by this Masterplan* – Projects are referred to in, but not proposed by, the Masterplan;
- *Does not generate development and change* – Elements of the Masterplan which will not in themselves lead to development or other change;
- *Change with no pathway* – They are elements which make provision for change but which could have no conceivable effect because of the absence of a link or pathway between the plan and European sites;
- *Change with ‘no’ or minimal effects* – They are elements of the Masterplan which make provision for change but effects are likely to be minimal; or have no adverse effect on site integrity, alone or in combination with other aspects of the same plan, or with other plans or projects.

B: APPROPRIATE ASSESSMENT (AA)

Note: An AA is a scientific appraisal of the impacts on a European site that needs to be able to ascertain whether the integrity of a European site will not be adversely affected. Aberdeen City Council, as a competent authority, can only give consent if they are certain as to the absence of such effects.

6a. Undertake Appropriate Assessment (AA) of the implications for the site in view of its conservation objectives.

The ALDP HRA process on Policies and Opportunity Sites concluded that there would be no adverse effect on any of the protected sites integrity, and that our experience is that there are a range of mitigation measures available that could effectively control the risk of any impacts likely to arise as a result of Policy B4 (Aberdeen Harbours) and Policy B5 (Energy Transition Zone), e.g. as demonstrated through the HRA process and accepted mitigation for the Aberdeen Harbour Expansion Project.

The ALDP HRA process also concluded that if future developments were likely to cause any adverse effects, then at that stage Project Level HRA would be required (as is also noted under Policy NE3 Natural Heritage). The need for Project Level HRA (such as this current assessment) was identified in relation to the ETZ area, and for this reason it concluded that there would be no adverse effect on sites integrity.

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The following sections outline the project level Appropriate Assessment associated to the ETZ Masterplan.

Assessment of risk and likely adverse effects on the integrity of the sites and conservation objectives for the qualifying interests/species:

| Masterplan Reference Screened In | Site/qualifying interests/species | Risk of adverse effects on the integrity of the sites |
|--|---|---|
| <p>4.1 Community & Energy Coast</p> <ul style="list-style-type: none"> - East Tullos Burn & Wetlands - St Fittick's Park, Greenspace & Green Networks | <p>River Dee SAC: Otter <i>Lutra lutra</i> Freshwater pearl mussel <i>Margaritifera margaritifera</i> Atlantic salmon <i>Salmo salar</i></p> | <p>Atlantic salmon and freshwater pearl mussels are sensitive to disturbance to their river habitat. This includes silt and sediment entering the watercourse, as well as other forms of pollution. The greatest risk of pollution from development is usually at construction stage, especially if there is a clear connection between the development site and the river. Salmon and freshwater pearl mussels may also be adversely affected by abstraction which, if substantial enough, may expose and dry out available habitat, increase water temperatures, and reduce dilution of pollution. The qualifying interests are also potentially vulnerable to direct impacts, e.g. arising through river engineering works. These kind of changes might destroy or degrade habitat or can directly damage or stress the salmon or pearl mussels.</p> <p>There are considered to be no LSE to the Upper Dee catchment due to distance. Up to Peterculter marks the tidal limit. As such, any LSE are only considered to relate to the Outer/lower Dee catchment.</p> <p>Proposed development will not have any LSE on the freshwater pearl mussel due to distance with no direct pathways. Qualifying species populations located 6-30 km upstream of the mouth of the River Dee. There are no freshwater pearl mussel in the Outer Dee.</p> <p>Recent site-specific surveys 2021-23 (commissioned by ETZ Ltd.) have recorded no signs of use by Otter on any of the three development Zones, including surveying the St Fittick's wetlands and burn over the last three seasons. Zone C does not have habitat capable of supporting Otter. With regard to Zones A and B, it is also considered that Otter may make infrequent use of the mouth of East Tullos Burn, its surrounding wetland and the adjacent coast – specifically the mouth of the Dee mouth and Girdle Ness to Greg Ness section of coast. However it is recognised that this is not an optimal habitat and represents a relatively small</p> |

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| | | <p>proportion of the designated area (2334.48ha). Habitat suitability will be increased in line with (i), (ii) and (iii) above. East Tullos Burn wetland habitat do not currently support prey species, notably amphibians appear to be absent. Neither frogs nor toads have been observed breeding in the wetland pools. There may be number of reasons which include poor water quality and absence of local populations for natural colonisation. Therefore, in the context of the overall Dee catchment and the likely identified construction and operational LSEs, development is not considered to adversely affect the status of Otter within the whole SAC. As such, the current site conditions for Otter will not be affected and the conservation objectives met during both construction and operation. However, given the proximity of the Masterplan site to these areas, there could be adverse effects on the qualifying species by:</p> <ul style="list-style-type: none"> • Loss of potential breeding habitat in the East Tullos Burn and wetlands; • Denigration of water quality in all frequented areas; and; • Construction disturbance including noise and light pollution. The latter during construction and operation of the site. <p>However, the Masterplan includes relevant policies and mitigations to protect Otter (please see Mitigations section below).</p> <p>There is no watercourse connectivity with the River Dee and therefore no LSE on Atlantic salmon. Atlantic salmon do not make any use of the East Tullos Burn due low water volume, poor water quality, culvert impedances and lack of suitable spawning habitat. Breeding takes place in the upper Dee catchment which will not be directly or indirectly adversely impacted by the Masterplan. New drainage from zones A, B and C of the Masterplan area will partially discharge into Nigg Bay and surrounding coastal area where coastal migrating salmon could be locally adversely impacted by direct and diffuse pollution events via this pathway. However, adverse effects of localised pollution, sediment discharge and impedance through increased turbidity will not be a potentially adverse in impact because the level of suspension and volume of flow will both be low, and, would be discharged into a very high water volume for tidal dispersal.</p> |
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| | | <p>In terms of the River Dee SAC, another sensitivity and pressure is water abstraction. The River Dee SAC and any potential receptors (qualifying species) are generally considered to be both geographically remote and topographically isolated from any potential new discharges arising from construction or operation. The Masterplan will seek to minimise water usage through compliance with relevant building regulations and water use and drainage will be agreed with the relevant utilities providers. No abstractions from watercourses or groundwater are proposed as part of the Masterplan. As such, in the context of the background levels in the catchment and existing city discharge any new additions would be considered negligible and, if required, consented and licensed by SEPA. Therefore, in the context of any likely new discharge arising from development any impact would be “de minimis” due to dilution and quick flushing and as such would avoid any LSE.</p> |
| | <p>Moray Firth SAC: Bottlenose dolphin <i>Tursiops truncatus</i></p> | <p>For proposed developments in coastal locations there may be a potential negative impact on bottlenose dolphins if underwater noise is generated that prevents or limits their use of the areas that help support them such as Aberdeen harbour. Such noise might be generated from piling or blasting works. Coastal pollution might also affect dolphins or their prey species.</p> <p>There is potential for localised water quality impacts from outfall to Nigg Bay from pollution events, thus potential to affect supporting food sources of the qualifying species; however due to geographical distance, discharges are regulated by SEPA, and the Masterplan includes policies to protect and enhance water quality of the East Tullos Burn which is the only direct pathway to the marine environment via the outfall at Nigg Bay, it concludes that there is no LSE.</p> |
| | <p>Ythan Estuary, Sands of Forvie and Meikle Loch SPA: Sandwich tern <i>Sterna sandvicensis</i>; Common tern <i>Sterna hirundo</i>; Little tern <i>Sterna albifrons</i>; Pink-footed goose <i>Anser</i></p> | <p>Theoretically, a proportion of the common eider in Nigg Bay is from different SPAs, indicating upwards of 97% are from the breeding population at the Ythan estuary and will form part of the wintering population of that SPA. It is possible that some aspects of development at could affect qualifying species of the SPA.</p> <p>In general, mobile bird species are well represented by common coastal birds, wetland birds and birds of young plantations. The conservation status of the recorded bird species is a typical assemblage for the</p> |

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| | <p><i>brachyrhynchus</i>; Common eider <i>Somateria mollissima mollissima</i>; Lapwing <i>Vanellus vanellus</i>; Redshank <i>Tringa tetanus</i>; Non-breeding waterbird assemblage.</p> | <p>habitats that were surveyed. Recent in-season bird surveys (commissioned by ETZ Ltd.) have only indicated visiting presence for common eider and Sandwich tern, however given the geographical distance from the site no LSE are anticipated. In addition, the coastline here (adjacent to Zone B) is not considered a high value resource for breeding birds, bare ground being the dominant habitat. Indirect effects through potential loss of supporting habitats, foraging land (inc. wetlands) and food sources for bird species, however the Masterplan contains policies to avoid/minimise habitat disturbance/fragmentation, and for biodiversity net-gain.</p> |
| | <p>Loch of Skene SPA: Goldeneye <i>Bucephala clangula</i>; Goosander <i>Mergus merganser</i>; Greylag goose <i>Anser anser.</i></p> | <p>Greylag geese are present on the SPA in very low numbers but the city boundary is within foraging range (20km) of the SPA, and so it is theoretically possible that the proposed development could result in some loss of foraging ground. Loss of foraging land to development is anticipated to be from the direct footprint of a development (as opposed to construction or recreation). This aspect can be appraised by considering the SPA goose foraging distribution data and take account of the availability of alternative habitat for the geese, and the potential for any in-combination effects alongside other plans and allocations (in this case the most relevant being the Aberdeenshire proposed LDP).</p> <p>Goosander and goldeneye are also qualifying features of the SPA. We have little information on in-winter movements of goosander in Scotland. Goosander only use Loch of Skene as a roost and there has been a strong decline in their numbers at the loch. Only three were observed in 2018 counts. However numbers on the Dee and the Don remain healthy, and it is unlikely that development would have any adverse effect on the SPA goosander and goldeneye populations.</p> <p>Our experience is that given the status of the relevant goose populations, the low land area for development, the geographical distance, no recorded recent species presence at the proposed development, and, the location of the development, it would not encroach on any known preferred SPA goose foraging area and therefore any loss of foraging habitat from the development will be negligible, concluding there will be no LSE on site integrity in relation to loss of foraging habitat for SPA geese.</p> |

HABITATS REGULATIONS APPRAISAL PROFORMA

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| | <p>Buchan Ness to Collieston Coast SPA: Fulmar <i>Fulmarus glacialis</i>;</p> <p>Guillemot <i>Uria aalge</i>; Herring gull <i>Larus argentatus</i>;</p> <p>Kittiwake <i>Rissa tridactyla</i>; Shag <i>Phalacrocorax aristotelis</i>;</p> <p>Seabird assemblage.</p> | <p>In general, mobile bird species are well represented by common coastal birds, wetland birds and birds of young plantations. The conservation status of the recorded bird species is a typical assemblage for the habitats that were surveyed. Recent in-season bird surveys (commissioned by ETZ Ltd.) have only indicated visiting presence for and Herring gull and Shag, for feeding and foraging. Local breeding for Herring gull and Kittiwake has been recorded however this is in relation to the roof of the WWTW (Zone A) and on the Coastline outside Zone B. Indirect effects through potential loss of supporting habitats, foraging land (inc. wetlands) and food sources for bird species, however given the geographical distance from the site, and the Masterplan contains policies to avoid/minimise habitat disturbance/fragmentation, and for biodiversity net-gain, no LSE are anticipated.</p> |
| | <p>Isle of May SAC: Grey seal <i>Halichoerus grypus</i>.</p> | <p>Previous seal telemetry analysis (for Aberdeen harbour expansion in 2016) showed that although grey seals tagged at the Isle of May SAC and Berwickshire and North Northumberland Coast SAC used Nigg Bay, the degree of connectivity was only of a sufficient strength to warrant further assessment of the Isle of May SAC grey seal population (but not the Berwickshire and North Northumberland Coast SAC population). However, it is concluded that there will be no LSE on the distribution of the qualifying species or extent of the habitats supporting it due to geographical distance from the proposed Masterplan zone and that the development does not directly relate to harbour construction or operations beyond the shoreline.</p> |
| | <p>Berwickshire and North Northumberland Coast SAC: Grey seal <i>Halichoerus grypus</i>.</p> | <p>Previous seal telemetry analysis (for Aberdeen harbour expansion in 2016) showed that although grey seals tagged at the Isle of May SAC and Berwickshire and North Northumberland Coast SAC used Nigg Bay, the degree of connectivity was only of a sufficient strength to warrant further assessment of the Isle of May SAC grey seal population (but not the Berwickshire and North Northumberland Coast SAC population). No LSE on the distribution or extent of the habitats supporting the qualifying interest due to geographical distance from the proposed Masterplan zone.</p> |
| 4.2 Marine Gateway | <p>River Dee SAC: Otter <i>Lutra lutra</i></p> | <p>No LSE, as per response to Ref 4.1 above.</p> |

HABITATS REGULATIONS APPRAISAL PROFORMA

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| <p>(Opportunities & Constraints; Development Guidance)</p> <ul style="list-style-type: none"> - Opportunities & Constraints: St Fittick's Park & Aberdeen South Harbour - Land Use - Infrastructure - Landscape & Environment | <p>Freshwater pearl mussel <i>Margaritifera margaritifera</i></p> <p>Atlantic salmon <i>Salmo salar</i></p> | |
| | <p>Moray Firth SAC: Bottlenose dolphin <i>Tursiops truncatus</i></p> | <p>As per above. For proposed developments in coastal locations there may be a potential negative impact on bottlenose dolphins if underwater noise is generated that prevents or limits their use of the areas that help support them such as Aberdeen harbour. Such noise might be generated from piling or blasting works. Coastal pollution might also affect dolphins or their prey species.</p> <p>There is potential for localised water quality impacts from outfall to Nigg Bay from pollution events, thus potential to affect supporting food sources of the qualifying species; however due to geographical distance, discharges are regulated by SEPA, and the Masterplan includes policies to protect and enhance water quality of the East Tullos Burn which is the only direct pathway to the marine environment via the outfall at Nigg Bay, it concludes that there is no LSE.</p> |
| | <p>Ythan Estuary, Sands of Forvie and Meikle Loch SPA: Sandwich tern <i>Sterna sandvicensis</i>; Common tern <i>Sterna hirundo</i>; Little tern <i>Sterna albifrons</i>; Pink-footed goose <i>Anser brachyrhynchus</i>; Common eider <i>Somateria mollissima mollissima</i>; Lapwing <i>Vanellus vanellus</i>; Redshank <i>Tringa tetanus</i>; Non-breeding waterbird assemblage.</p> | <p>As per above. Theoretically, a proportion of the common eider in Nigg Bay is from different SPAs, indicating upwards of 97% are from the breeding population at the Ythan estuary and will form part of the wintering population of that SPA. It is possible that some aspects of development at could affect qualifying species of the SPA.</p> <p>In general, mobile bird species are well represented by common coastal birds, wetland birds and birds of young plantations. The conservation status of the recorded bird species is a typical assemblage for the habitats that were surveyed. Recent in-season bird surveys (commissioned by ETZ Ltd.) have only indicated visiting presence for common eider and Sandwich tern, however given the geographical distance from the site no LSE are anticipated. In addition, the coastline here (adjacent to Zone B) is not considered a high value resource for breeding birds, bare ground being the dominant habitat. Indirect effects through potential loss of supporting habitats, foraging land (inc. wetlands) and food sources for bird species, however the Masterplan contains policies to avoid/minimise habitat disturbance/fragmentation, and for biodiversity net-gain.</p> |

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| | <p>Loch of Skene SPA: Goldeneye <i>Bucephala clangula</i>; Goosander <i>Mergus merganser</i>; Greylag goose <i>Anser anser</i>.</p> | <p>Greylag geese are present on the SPA in very low numbers but the city boundary is within foraging range (20km) of the SPA, and so it is theoretically possible that the proposed development could result in some loss of foraging ground. Loss of foraging land to development is anticipated to be from the direct footprint of a development (as opposed to construction or recreation). This aspect can be appraised by considering the SPA goose foraging distribution data and take account of the availability of alternative habitat for the geese, and the potential for any in-combination effects alongside other plans and allocations (in this case the most relevant being the Aberdeenshire proposed LDP).</p> <p>Goosander and goldeneye are also qualifying features of the SPA. We have little information on in-winter movements of goosander in Scotland. Goosander only use Loch of Skene as a roost and there has been a strong decline in their numbers at the loch. Only three were observed in 2018 counts. However numbers on the Dee and the Don remain healthy, and it is unlikely that development would have any adverse effects on the SPA goosander and goldeneye populations.</p> <p>Our experience is that given the status of the relevant goose populations, the low land area for development, the geographical distance, no recorded recent species presence at the proposed development, and, the location of the development, it would not encroach on any known preferred SPA goose foraging area and therefore any loss of foraging habitat from the development will be negligible, concluding there will be no LSE on site integrity in relation to loss of foraging habitat for SPA geese.</p> |
| | <p>Buchan Ness to Collieston Coast SPA: Fulmar <i>Fulmarus glacialis</i>; Guillemot <i>Uria aalge</i>; Herring gull <i>Larus argentatus</i>; Kittiwake <i>Rissa tridactyla</i>; Shag <i>Phalacrocorax aristotelis</i>;</p> | <p>As per above. In general, mobile bird species are well represented by common coastal birds, wetland birds and birds of young plantations. The conservation status of the recorded bird species is a typical assemblage for the habitats that were surveyed. Recent in-season bird surveys (commissioned by ETZ Ltd.) have only indicated visiting presence for and Herring gull and Shag, for feeding and foraging. Local breeding for Herring gull and Kittiwake has been recorded however this is in relation to the roof of the WWTW (Zone A) and on the Coastline outside Zone B. Indirect effects through potential loss of supporting habitats, foraging land (inc. wetlands) and food sources for bird species, however given the geographical distance from the site,</p> |

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| | <p>Seabird assemblage.</p> | <p>and the Masterplan contains policies to avoid/minimise habitat disturbance/fragmentation, and for biodiversity net-gain, no LSE are anticipated.</p> |
| | <p>Isle of May SAC: Grey seal <i>Halichoerus grypus.</i></p> | <p>Previous seal telemetry analysis (for Aberdeen harbour expansion in 2016) showed that although grey seals tagged at the Isle of May SAC and Berwickshire and North Northumberland Coast SAC used Nigg Bay, the degree of connectivity was only of a sufficient strength to warrant further assessment of the Isle of May SAC grey seal population (but not the Berwickshire and North Northumberland Coast SAC population). However, it is concluded that there will be no LSE on the distribution of the qualifying species or extent of the habitats supporting it due to geographical distance from the proposed Masterplan zone and that the development does not directly relate to harbour construction or operations beyond the shoreline.</p> |
| | <p>Berwickshire and North Northumberland Coast SAC: Grey seal <i>Halichoerus grypus.</i></p> | <p>Previous seal telemetry analysis (for Aberdeen harbour expansion in 2016) showed that although grey seals tagged at the Isle of May SAC and Berwickshire and North Northumberland Coast SAC used Nigg Bay, the degree of connectivity was only of a sufficient strength to warrant further assessment of the Isle of May SAC grey seal population (but not the Berwickshire and North Northumberland Coast SAC population). No LSE on the distribution or extent of the habitats supporting the qualifying interest due to geographical distance from the proposed Masterplan zone. There is potential disturbance to grey seals through increased maritime activities, such as through increased offshore wind and associated infrastructure, however this is not directly generated by the Masterplan and is regulated by others.</p> |
| <p>St Fittick's Park Preventative and Remediative Measures and Gregness Preventative and Remediative Measures</p> <ul style="list-style-type: none"> - East Tullos Burn & Wetlands - Park, Greenspace | <p>River Dee SAC: Otter <i>Lutra lutra</i> Freshwater pearl mussel <i>Margaritifera margaritifera</i> Atlantic salmon <i>Salmo salar</i></p> | <p>No LSE, as per response to Ref 4.1 above and Mitigations section below.</p> |
| | <p>Moray Firth SAC: Bottlenose dolphin <i>Tursiops truncatus</i></p> | <p>As per above. For proposed developments in coastal locations there may be a potential negative impact on bottlenose dolphins if underwater noise is generated that prevents or limits their use of the areas that help support them such as Aberdeen harbour. Such noise</p> |

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| <p>& Green Networks</p> <p>- Indicative Masterplan (illustrative concept)</p> | | <p>might be generated from piling or blasting works. Coastal pollution might also affect dolphins or their prey species.</p> <p>There is potential for localised water quality impacts from outfall to Nigg Bay from pollution events, thus potential to affect supporting food sources of the qualifying species; however due to geographical distance, discharges are regulated by SEPA, and the Masterplan includes policies to protect and enhance water quality of the East Tullos Burn which is the only direct pathway to the marine environment via the outfall at Nigg Bay, it concludes that there is no LSE.</p> |
| | <p>Ythan Estuary, Sands of Forvie and Meikle Loch SPA: Sandwich tern <i>Sterna sandvicensis</i>; Common tern <i>Sterna hirundo</i>; Little tern <i>Sterna albifrons</i>; Pink-footed goose Anser brachyrhynchus; Common eider <i>Somateria mollissima mollissima</i>; Lapwing <i>Vanellus vanellus</i>; Redshank <i>Tringa tetanus</i>; Non-breeding waterbird assemblage.</p> | <p>As per above. Theoretically, a proportion of the common eider in Nigg Bay is from different SPAs, indicating upwards of 97% are from the breeding population at the Ythan estuary and will form part of the wintering population of that SPA. It is possible that some aspects of development at could affect qualifying species of the SPA.</p> <p>In general, mobile bird species are well represented by common coastal birds, wetland birds and birds of young plantations. The conservation status of the recorded bird species is a typical assemblage for the habitats that were surveyed. Recent in-season bird surveys (commissioned by ETZ Ltd.) have only indicated visiting presence for common eider and Sandwich tern, however given the geographical distance from the site no LSE are anticipated. In addition, the coastline here (adjacent to Zone B) is not considered a high value resource for breeding birds, bare ground being the dominant habitat. Indirect effects through potential loss of supporting habitats, foraging land (inc. wetlands) and food sources for bird species, however the Masterplan contains policies to avoid/minimise habitat disturbance/fragmentation, and for biodiversity net-gain.</p> |
| | <p>Loch of Skene SPA: Goldeneye <i>Bucephala clangula</i>; Goosander <i>Mergus merganser</i>; Greylag goose <i>Anser anser</i>.</p> | <p>No LSE due to geographical distance, no direct pathway, and, in relation to the Masterplan's nature-positive and remediative policies. Indirect effects from the potential increase in off-shore wind activities affecting mobile species, however this is not directly generated by the Masterplan and would be regulated by others.</p> |

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| | <p>Buchan Ness to Collieston Coast SPA: Fulmar <i>Fulmarus glacialis</i>; Guillemot <i>Uria aalge</i>; Herring gull <i>Larus argentatus</i>; Kittiwake <i>Rissa tridactyla</i>; Shag <i>Phalacrocorax aristotelis</i>; Seabird assemblage.</p> | <p>As per above. In general, mobile bird species are well represented by common coastal birds, wetland birds and birds of young plantations. The conservation status of the recorded bird species is a typical assemblage for the habitats that were surveyed. Recent in-season bird surveys (commissioned by ETZ Ltd.) have only indicated visiting presence for and Herring gull and Shag, for feeding and foraging. Local breeding for Herring gull and Kittiwake has been recorded however this is in relation to the roof of the WWTW (Zone A) and on the Coastline outside Zone B. Indirect effects through potential loss of supporting habitats, foraging land (inc. wetlands) and food sources for bird species, however given the geographical distance from the site, and the Masterplan contains policies to avoid/minimise habitat disturbance/fragmentation, and for biodiversity net-gain, no LSE are anticipated.</p> |
| | <p>Isle of May SAC: Grey seal <i>Halichoerus grypus</i>.</p> | <p>Previous seal telemetry analysis (for Aberdeen harbour expansion in 2016) showed that although grey seals tagged at the Isle of May SAC and Berwickshire and North Northumberland Coast SAC used Nigg Bay, the degree of connectivity was only of a sufficient strength to warrant further assessment of the Isle of May SAC grey seal population (but not the Berwickshire and North Northumberland Coast SAC population). However, it is concluded that there will be no LSE on the distribution of the qualifying species or extent of the habitats supporting it due to geographical distance from the proposed Masterplan zone and that the development does not directly relate to harbour construction or operations beyond the shoreline.</p> |
| | <p>Berwickshire and North Northumberland Coast SAC: Grey seal <i>Halichoerus grypus</i>.</p> | <p>Previous seal telemetry analysis (for Aberdeen harbour expansion in 2016) showed that although grey seals tagged at the Isle of May SAC and Berwickshire and North Northumberland Coast SAC used Nigg Bay, the degree of connectivity was only of a sufficient strength to warrant further assessment of the Isle of May SAC grey seal population (but not the Berwickshire and North Northumberland Coast SAC population). No LSE on the distribution or extent of the habitats supporting the qualifying interest due to geographical distance from the proposed Masterplan zone.</p> |
| <p>4.3 Hydrogen Campus</p> | <p>River Dee SAC: Otter <i>Lutra lutra</i> Freshwater pearl</p> | <p>No LSE due to lack of supporting habitats for qualifying species and no direct pathway. Indirect impacts</p> |

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| <p>(Development Guidance)</p> <ul style="list-style-type: none"> - Land Use - Transport & Connectivity - Landscape & Environment - Indicative Masterplan illustrative concept) | <p>mussel <i>Margaritifera margaritifera</i></p> <p>Atlantic salmon <i>Salmo salar</i></p> | through water abstraction and pollution events, please see above in this respect and below under mitigations. |
| | <p>Moray Firth SAC:</p> <p>Bottlenose dolphin <i>Tursiops truncatus</i></p> | No LSE due to geographical distance from site and no direct pathway. |
| | <p>Ythan Estuary, Sands of Forvie and Meikle Loch SPA:</p> <p>Sandwich tern <i>Sterna sandvicensis</i>;</p> <p>Common tern <i>Sterna hirundo</i>;</p> <p>Little tern <i>Sterna albifrons</i>; Pink-footed goose <i>Anser brachyrhynchus</i>;</p> <p>Common eider <i>Somateria mollissima mollissima</i>;</p> <p>Lapwing <i>Vanellus vanellus</i>;</p> <p>Redshank <i>Tringa tetanus</i>; Non-breeding waterbird assemblage.</p> | No LSE due to geographical distance and no pathway i.e. no supporting feeding habitat. |
| | <p>Loch of Skene SPA:</p> <p>Goldeneye <i>Bucephala clangula</i>;</p> <p>Goosander <i>Mergus merganser</i>;</p> <p>Greylag goose <i>Anser anser</i>.</p> | No LSE due to geographical distance and no pathway i.e. no supporting feeding habitat. |
| | <p>Buchan Ness to Collieston Coast SPA:</p> <p>Fulmar <i>Fulmarus glacialis</i>;</p> <p>Guillemot <i>Uria aalge</i>; Herring</p> | No LSE due to geographical distance and no pathway i.e. no supporting feeding habitat. |

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| | gull <i>Larus argentatus</i> ; Kittiwake <i>Rissa tridactyla</i> ; Shag <i>Phalacrocorax aristotelis</i> ; Seabird assemblage. | |
| | Isle of May SAC: Grey seal <i>Halichoerus grypus</i> . | No LSE due to geographical distance from site and no pathway. |
| | Berwickshire and North Northumberland Coast SAC: Grey seal <i>Halichoerus grypus</i> . | No LSE due to geographical distance from site and no pathway. |

6b. Mitigation or modifications required to ensure adverse effects are avoided & reasons for these.

The following section lists the relevant mitigations and modifications to the ETZ development proposal and Masterplan which are proposed to ensure no adverse effects on the integrity of the protected sites and their qualifying interests. In terms of delivery, these measures will be referenced in production of the final Draft ETZ Masterplan as an appendix. Furthermore, an additional HRA will be required on the subsequent PPiP application and the respective mitigation measures as per below will be carried through to this stage and thus secured through suitable conditions applied to any future PPiP consenting process.

Relevant overarching mitigations for the **development** include:

1. Development of the site would adhere to environmental legislation and best practice guidance in relation to protection of human health and groundwater (and the water environment), and also to the appropriate management of soils during construction.
2. Potential impacts in relation to the natural environment will be assessed and addressed through the development of technical assessments, including Contaminated Land Assessment, Construction Environmental Plan (CEMP), Construction Traffic Management Plan and Noise Impact Assessment.
3. Operationally, the proposals will include a Landscape Framework supported by a Site Biodiversity Action Plan.
4. Furthermore, it is however anticipated that detailed mitigation measures, if required, will be included as part of any detailed planning application for proposals within land covered by the Masterplan area. However, it is unlikely that any further such HRA assessments would be required in Zone C.

Key mitigations to minimise disturbance, loss and fragmentation to **habitats** includes:

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1. The East Tullos Burn crosses St Fittick's Park (Zone A) and is to be retained, with a partial section re-aligned in order to enable formation of development plots.
2. The proposals will also include measures to protect and enhance the local environment and biodiversity within and around areas of development through buffer zones, boundary treatments, development plot landscaping, tree and pollinator planting, and other blue-green infrastructures.
3. Importance of a Site Biodiversity Action Plan (SBAP) has been recognised to deliver 'no net loss' to biodiversity and promotion of 'nature-based solutions' in line with the SBAP.
4. Area-specific, over-arching CEMP, absorbing the AHEP CEMP for delivery of mitigation, and any follow-on compensation and enhancement – in order to capture the complexity of habitats and their intrinsic public appeal and biodiversity value in a semi-urban setting. Proposed to be delivered at the same time as, finalising the masterplan and any landscape plans.

Key mitigation measures for **Otter** are:

1. Protections and control measures implemented through a Construction Environmental Management Plan, with integral Pollution Plan.
2. Production of a Site Biodiversity Action Plan.
3. Maintenance and improvement of natural otter corridors at St Fittick's Park and East Tullos Burn.
4. Avoiding disturbance to inter-tidal habitat or coastal escarpment habitat in Zone B, as masterplanned.
5. Provision of two artificial breeding holts, constructed to the specification in NatureScot guidance.
6. Reduction of potential disturbance caused by construction noise, soft starts will be adopted in Zones A and B.
7. Wildlife friendly lighting, directed away from potential otter habitat during construction and operational phases in Zones A and B.
8. Retention of otter habitat at St Fittick's including, retention of open channel, reedswamp and pools for shelter and foraging.
9. Enhancement of St Fittick's Park wetland by upstream water treatment to improve water quality, primarily by removal of suspended sediments and nutrient stripping. Water quality discharges will be better than existing.
10. Proposed potential for otter food sources (amphibian) to be re-introduced to the wetland system by direct translocation of spawn during the construction period but only after the completion of the upstream measures to improve water quality.
11. Application of regular protected species survey updates (annual survey) to maintain records of otter interest and ensure appropriate mitigation. Consultation with NatureScot should otter features requiring licensing be identified.
12. Specific mitigation measures will be proposed to encourage spread of any local Otter into Zone A, the St Fittick's wetlands and burn, and to ensure that any future use of the coastline at Zone B is not adversely affected. These measures will include:
 - (i) Retention of all key habitat capable supporting the viability of otter e.g. retention of reedbeds, retention of reedswamp for above ground couching and avoidance of potentially adverse effects on the ponds so that they may support otter prey populations. There is one culvert crossing required and this would be limited in width as far as possible with mammal ledges designed in.
 - (ii) Improvements to the discharged water quality in the East Tullos Burn and wetlands and outfall

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(iii) Construction of an artificial holts in Zones A and B based on project ecologist's advice.

Key mitigations for **mobile bird species** include:

1. Avoid/minimise impacts on breeding birds – Where practical, time all groundworks, particularly tree and scrub clearance, outwith the bird breeding season. Any new disturbance to any habitats during the bird breeding season will require advance surveys to ensure that legal obligations are met. Findings and recommendations of such surveys should be fully implemented.
2. Key bird species mitigation – Red List SoCC and UK, Scottish and local BAP priorities will be adversely impacted in small numbers through displacement following development. Special measures must be included to minimise the local reduction in number, particularly in Zone C.
3. Bat Species Protection Plan (SPP) – Commission and implement a bat SPP which delivers Black Hill Ecology Ltd 2023 Bat Report recommendations. Only one species roosting – pipistrelle, but recommended inclusion of bat boxes as part of the overall development scheme.
4. Habitat / foraging wise, mitigation and enhancement as covered in the SBAP for the development zones.
5. Write and deliver SBAPs for Zones A, B and C – Each SBAP should assimilate all principle proposed measures as well as identifying new enhancements based on updating surveys, detailed site layouts, drainage and landscaping. An Ecological Clerk of Works (EcCOW) should be appointed to ensure delivery of the SBAP during the construction phase.

A detailed **Site Biodiversity Action Plan** has been drafted and includes a range of requirements that also relate to **mobile species**, including the following:

Zone A - East Tullos Burn and Wetlands

- Upstream interventions to improve water quality reaching the wetlands to encourage submerged plants.
- Re-alignment and enhancement of the East Tullos Burn. Enhancements to include meanders, mini-floodplains and small detention basins.
- Toad introduction scheme to establish a breeding population.
- Construction of a new artificial otter holt to encourage a more regular presence.
- Management of native invasives, for example reed sweet grass, to maintain open water.

Zone B – Gregness

- Protection of the coastal heath and species – rich grassland that has naturally regenerated.
- Enhancement of the coastal habitat through removal of invading scrub.
- Supporting the Pollinator Coast Project by encouraging the spread of kidney vetch, a larval food plant for the small blue butterfly.
- Coastal grassland seed mix sowing to encourage coastal butterflies in decline e.g. grayling.
- New native tree and scrub planting (species lists included within the PPIP Landscape Framework too).

Zone C – Doonies

- Protection of the integrity of the northern ecological corridor.
- Compensatory native tree and scrub planting for loss of gorse scrub (species mixes included).
- Grassland enhancement through sowing new native species rich swards for seed eating birds, invertebrates, pollinators and hedgehogs.

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- Installation of new native hedges and log-piles for hedgehogs and other fauna.
- Nestbox scheme for house sparrow, tree sparrow and starling.
- Bat box scheme to compensate for loss of non-breeding common pipistrelle roost.
- Breeding bumblebee homes/boxes.

Effects and consideration of alternatives:

Subject to the above mitigations consideration of alternative sites is not required. Nevertheless, the development site has been subject to the local development plan process which has considered alternative sites previously, and the 'Aberdeen Energy Transition Zone Feasibility Study' (February 2020) produced by Barton Wilmore/Opportunity North East and Invest Aberdeen also assessed suitability of alternative (Aberdeen-area sites). This site assessment criteria was based on:

- planning policy implications and environmental constraints,
- review of existing road infrastructure and potential new road provision/investment that could include site selection,
- to consider operational end-user requirements for land and proximity to the harbour etc; deliverability, availability, ownership, infrastructure constraints and servicing, and
- commentary received during technical workshops with key stakeholders which provided an extra level of insight on top of desktop reviews.

6c. Can it be ascertained that the proposal will not adversely affect the integrity of the site?

YES – In the light of the foregoing, we consider that it has been ascertained that the proposal will not adversely affect the integrity of any of the protected sites or their qualifying interests, and that the conservation objectives for will be met during and after construction and following implementation and delivery of the aforementioned mitigation measures.

Note: Seek advice from NatureScot as required at this point

7. Advice and conclusion received from NatureScot in relation to plan or project

NatureScot has been consulted at an early stage on the proposals through the SEA and HRA processes for the LDP allocations and were subsequently consulted by both the applicant and The Planning Authority on the developing Draft Masterplan.

NatureScot feedback letter dated 30/10/2023:

"Thank you for consulting us on the Habitats Regulations Appraisal (HRA) for the Aberdeen Energy Transition Zone Masterplan and for agreeing to an extension to our response deadline. We agree with the conclusions reached in the HRA, that from the information currently available, the masterplan should not adversely affect the integrity of any of the designated sites identified. This should be revisited through project level HRA once planning applications come forward to deliver the masterplan. We note the mitigation suggested in relation to the River Dee SAC population of otters and advise that an up to date survey for otter is provided with future planning applications for zone A. This can inform an HRA for those applications and allow consideration of otter as a European Protected Species.

HABITATS REGULATIONS APPRAISAL PROFORMA

Additional Comments;

We would note that there is a lack of clarity between the stages of the assessment as conclusions in section 6a sometimes incorrectly refer to ‘no likely significant effect’ rather than ‘no adverse effect on site integrity’. Section 6a is the Appropriate Assessment and should determine whether or not the proposal will adversely affect the integrity of the site following a conclusion of ‘likely significant effect’ in section 5. Although we agree with the conclusions of the HRA, we would advise a change of wording and structure to ensure a clear reasoning can be followed to reach the conclusions of no adverse impact on site integrity.”

8. Tracking Checklist/ Sign off

| | |
|--|------------|
| Proposal directly for Nature Conservation of a European site – Section 4 | No |
| Proposal Screened Out – Section 5 | No |
| Appropriate Assessment Concludes Proposal Will Not Adversely Affect Any Site/ Qualifying Interest – Section 6c | Yes |
| Appropriate Assessment <u>Cannot</u> Conclude Proposal Will Not Adversely Affect Any Site/ Qualifying Interest – Section 6c | No |

| | |
|--|--|
| Date LDP HRA checked | July/August 2023 |
| Date NatureScot consulted | Consulted 25/09/2023 Response received 30/10/2023 |
| Date any other organisations consulted e.g. Dee Salmon Fishery Board, SEPA, Marine Scotland | n/a |
| Signature (author) | RKerr |
| Name and Job Title (author) | Rebecca Kerr (Planner – Development Management) |
| Date (author) | Draft v2 completed 15/09/2023 Revised final v3 completed 09/11/2023 |

Appendix 1. Screening of Energy Transition Zone Masterplan (July 2023) for aspects which would be likely to have a significant effects

| List of vision, objective, principles, policies and projects in the Energy Transition Zone Masterplan | General policy / background info | Too general with no info on where, how and when of development | Preventive, enhancement and conservation policy | Not generated by this Masterplan | Does not generate development and change | Change with no pathway | Change with 'no' or minimal effects | Screen in / out |
|---|----------------------------------|--|---|----------------------------------|--|------------------------|-------------------------------------|---|
| 1. Introduction | | | | | | | | |
| Contents & Executive Summary | Yes | Yes | | | Yes | | | Out |
| 1.1 ETZ Vision & Objectives | Yes | | | | Yes | | | Out – issues covered in more detail elsewhere in document |
| 1.2 Strategic Context & Need | | Yes | | | Yes | | | Out – issues covered in more detail elsewhere in document |
| 1.3 Engagement & Consultation | Yes | | | | Yes | | | Out |
| 2. Place Context & Strategy | | | | | | | | |
| Masterplan Study Area (Map / Plan) | Yes | | | | | | | Out – issues covered in more detail elsewhere in document |
| Land ownership | Yes | | | Yes | Yes | | | Out |
| 2.1 Place Context: Planning History | Yes | | | | | | | Out – descriptive /scene setting |
| 2.2 Place Context: Community & Social | Yes | | | | Yes | | | Out – descriptive /scene setting |
| 2.3 Place Context: Environment, Biodiversity & Landscape | Yes | Yes | | | Yes | | | Out |
| 2.4 Place Context: Infrastructure & Development | Yes | Yes | | | | | | Out – descriptive /scene setting |
| 2.5 Place Context: Community Infrastructure & Local Development | Yes | Yes | | Yes | | | | Out – descriptive /scene setting |
| 3. ETZ Masterplan Framework | | | | | | | | |
| 3.1 Masterplan Vision & Opportunity | Yes | Yes | | | | | | Out – issues covered in more detail elsewhere in document |
| 3.2 Masterplan Principles | | Yes | Yes | | | | | Out |
| 3.3 Core Masterplan | Yes | | | | | | | Out – issues covered in |

| Elements & Enabling Infrastructures | | | | | | | | more detail elsewhere in document |
|---|----------------------------------|--|---|---------------------------------|--|------------------------|-------------------------------------|---|
| Screening of plan or projects described in Development Framework document | General policy / background info | Too general with no info on where, how and when of development | Preventive, enhancement and conservation policy | Not generated by this Framework | Does not generate development and change | Change with no pathway | Change with 'no' or minimal effects | Screen in / out |
| 4. ETZ Campuses | | | | | | | | |
| 4.1 Community & Energy Coast | | | | | | | | |
| - East Tullos Burn & Wetlands | | | | | | | | In – water quality |
| - St Fittick's Park, Greenspace & Green Networks | | | | | | | | In – water quality / increased pressure from development / access / use |
| - Biodiversity Protection & Enhancement | | | Yes | | | | | Out |
| - Active Travel & Healthy Communities | Yes | | | | | | Yes | Out |
| - Community Fund | Yes | | | | | | Yes | Out |
| - Development & Delivery | Yes | | | | | | Yes | Out |
| 4.2 Marine Gateway | | | | | | | | |
| - Visions, Planning & Policy Overview | Yes | | | | | | | Out |
| - Opportunities & Constraints: St Fittick's Park & Aberdeen South Harbour | | | | | | | | In – direct harbour / port access impacts / road construction |
| - Investment & Development Proposition | Yes | Yes | | | | | | Out |
| - Development Guidance: Land Use | | | | | | | | In – land development pressures |
| - Development Guidance: Design Quality | Yes | | | | | | | Out |
| - Development Guidance: Transport & Connectivity | Yes | | | | | | | Out |
| - Development Guidance: | | | | | | | | In – outfall to Nigg Bay retained / potential |

| | | | | | | | | |
|--|---|---|--|--|---|-------------------------------|--|--|
| Infrastructure | | | | | | | | transference |
| - Development Guidance: Landscape & Environment | | | | | | | | In – loss of green and natural spaces / changes to water quality |
| Screening of plan or projects described in Development Framework document | General policy / background info | Too general with no info on where, how and when of development | Preventive, enhancement and conservation policy | Not generated by this Framework | Does not generate development and change | Change with no pathway | Change with 'no' or minimal effects | Screen in / out |
| St Fittick's Park Preventative and Remediative Measures | | | | | | | | |
| - East Tullos Burn & Wetlands | | | | | | | | In – hydrology / ecology |
| - Trees & Woodland | | | | | | Yes | | Out – no direct pathway for qualifying species / habitats |
| - Biodiversity Protection & Enhancement | | | Yes | | | | | Out |
| - Heritage | | | | | | Yes | | Out |
| - Park, Greenspace & Green Networks | | | | | | | | In – potential impacts on supporting coastal habitats |
| - Local Amenity | | | | | | | Yes | Out – residential amenity factors |
| Gregness Preventative and Remediative Measures | | | | | | | | |
| - Biodiversity Protection & Enhancement | | | Yes | | | | | In – potential impacts on supporting coastal habitats |
| - Park, Greenspace & Green Networks | | | | | | | | In – potential impacts on supporting coastal habitats |
| - Local Amenity | | | | | | Yes | | Out – residential amenity factors |
| Key Masterplan Constraints, Opportunities & Considerations (illustrative plan) | | Yes | | | | | | Out |
| Strategic Mitigations & Compensations (illustrative plan) | | | Yes | | | | | Out |
| Indicative Masterplan – St Fittick's (illustrative) | | Yes | | | | | | In – potential impacts on supporting coastal |

| | | | | | | | | |
|--|---|---|--|--|---|-------------------------------|--|---|
| concept) | | | | | | | | habitats |
| Indicative Masterplan – Gregness (illustrative concept) | | Yes | | | | | | In – potential impacts on supporting coastal habitats |
| Screening of plan or projects described in Development Framework document | General policy / background info | Too general with no info on where, how and when of development | Preventive, enhancement and conservation policy | Not generated by this Framework | Does not generate development and change | Change with no pathway | Change with ‘no’ or minimal effects | Screen in / out |
| 4.3 Hydrogen Campus | | | | | | | | |
| - Development Vision, Planning & Policy Overview | Yes | | | | | | | Out |
| - Site Opportunities & Constraints | Yes | | | | | | | Out |
| - Investment & Development Proposition | Yes | Yes | | | | | | Out |
| - Development Guidance: Land Use | | | | | | | | In – potential impacts on supporting coastal habitats |
| - Development Guidance: Design Quality | Yes | | | | | | | Out |
| - Development Guidance: Transport & Connectivity | | | | | | | | In – potential disturbance / increased accessibility |
| - Development Guidance: Infrastructure | Yes | | | | | | Yes | Out |
| - Development Guidance: Landscape & Environment | | | | | | | | In – loss of green and natural spaces / supporting habitats |
| Doonies Preventative and Remediative Measures | | | | | | | | |
| - Biodiversity Protection & Enhancement | | | Yes | | | | | Out |
| - Local Amenity | | | | | | Yes | | Out |
| Indicative Masterplan Hydrogen Campus (illustrative concept) | | Yes | | | | | | In – potential impacts on supporting coastal habitats |
| Screening of plan or projects described in | General policy / | Too general with no info on where, how | Preventive, enhancement | Not generated by | Does not generate | Change with no | Change with ‘no’ | Screen in / out |

| Development Framework document | descriptive info | and when of development | and conservation policy | this Framework | development and change | pathway | or minimal effects | |
|--|------------------|-------------------------|-------------------------|----------------|------------------------|---------|--------------------|--|
| 4.4 Offshore Wind Campus | | | | | | | | |
| - Development Vision, Planning & Policy Overview | Yes | | | | | | Yes | Out – existing business industrial zoning |
| - Site Opportunities & Constraints | Yes | | | | | | Yes | Out – existing business industrial zoning |
| - Investment & Development Proposition | Yes | Yes | | | | | | Out |
| - Development Guidance: Land Use | Yes | | | | | | | Out – existing business industrial zoning |
| - Development Guidance: Design Quality | Yes | Yes | | | | | | Out |
| - Development Guidance: Transport & Connectivity | Yes | | | | | | Yes | Out |
| - Development Guidance: Infrastructure | Yes | | | | | | Yes | Out |
| - Development Guidance: Landscape & Environment | | | | | | | Yes | Out – limited pathways to qualifying species |
| Offshore Wind Campus (indicative masterplan) | | Yes | | | | | | Out |
| 4.5 Innovation Campus | | | | | | | | |
| - Vision, Planning & Policy Review | Yes | | | | | Yes | | Out |
| - Investment & Development Proposition | Yes | | | | | Yes | | Out |
| - Development Guidance: Land Use | Yes | | | | | Yes | | Out |
| - Development Guidance: Design Quality | Yes | | | | | Yes | | Out |
| - Development Guidance: Transport & Connectivity | Yes | | | | | Yes | | Out |

| Screening of plan or projects described in Development Framework document | General policy / descriptive info | Too general with no info on where, how and when of development | Preventive, enhancement and conservation policy | Not generated by this Framework | Does not generate development and change | Change with no pathway | Change with 'no' or minimal effects | Screen in / out |
|---|-----------------------------------|--|---|---------------------------------|--|------------------------|-------------------------------------|--|
| - Development Guidance: Infrastructure | Yes | Yes | | | | Yes | | Out – infrastructure in existing brownfield and industrial zonings |
| - Development Guidance: Landscape & Environment | Yes | | Yes | | | | | Out – supports brownfield land remediation |
| Innovation Campus (indicative masterplan) | Yes | | | | | Yes | | Out – existing industrial land |
| 4.6 Skills Campus | | | | | | | | |
| - Vision, Planning & Policy Overview | Yes | | | | | Yes | | Out |
| - Opportunities & Constraints | Yes | | | | | Yes | | Out |
| - Investment & Development Proposition | Yes | | | | | Yes | | Out |
| - Advance Manufacturing Skills Hub | Yes | | | | | Yes | | Out |
| - Development Guidance: Land Use | Yes | | | | | Yes | | Out |
| - Development Guidance: Design Quality | Yes | | | | | Yes | | Out |
| - Development Guidance: Transport & Connectivity | Yes | | | | | Yes | | Out |
| - Development Guidance: Infrastructure | Yes | | | | | Yes | | Out |
| - Development Guidance: Landscape & Environment | Yes | | | | | Yes | | Out |
| Skills Campus (indicative masterplan) | Yes | | | | | Yes | | Out |
| 5. Supporting Infrastructure | | | | | | | | |
| 5.1 Brownfield Land | Yes | | | | | Yes | | Out |

| | | | | | | | | |
|---|-----|--|--|--|--|--|-----|-----|
| Renewal | | | | | | | | |
| 5.2 Road Infrastructure | Yes | | | | | | Yes | Out |
| 5.3 Rail Freight Infrastructure | Yes | | | | | | Yes | Out |
| 5.4 Energy & Net-Zero Infrastructure | Yes | | | | | | Yes | Out |
| 5.5 Utilities Infrastructure & Waste Management | Yes | | | | | | Yes | Out |
| 6. Masterplan Delivery | | | | | | | | |
| Planning & EIA | Yes | | | | | | | Out |
| Phasing & Development Timeline | Yes | | | | | | | Out |
| - Years 0-3 | Yes | | | | | | | Out |
| - Years 3-6 | Yes | | | | | | | Out |
| - Years 6-10 | Yes | | | | | | | Out |
| Project Partnerships & Delivery | Yes | | | | | | | Out |

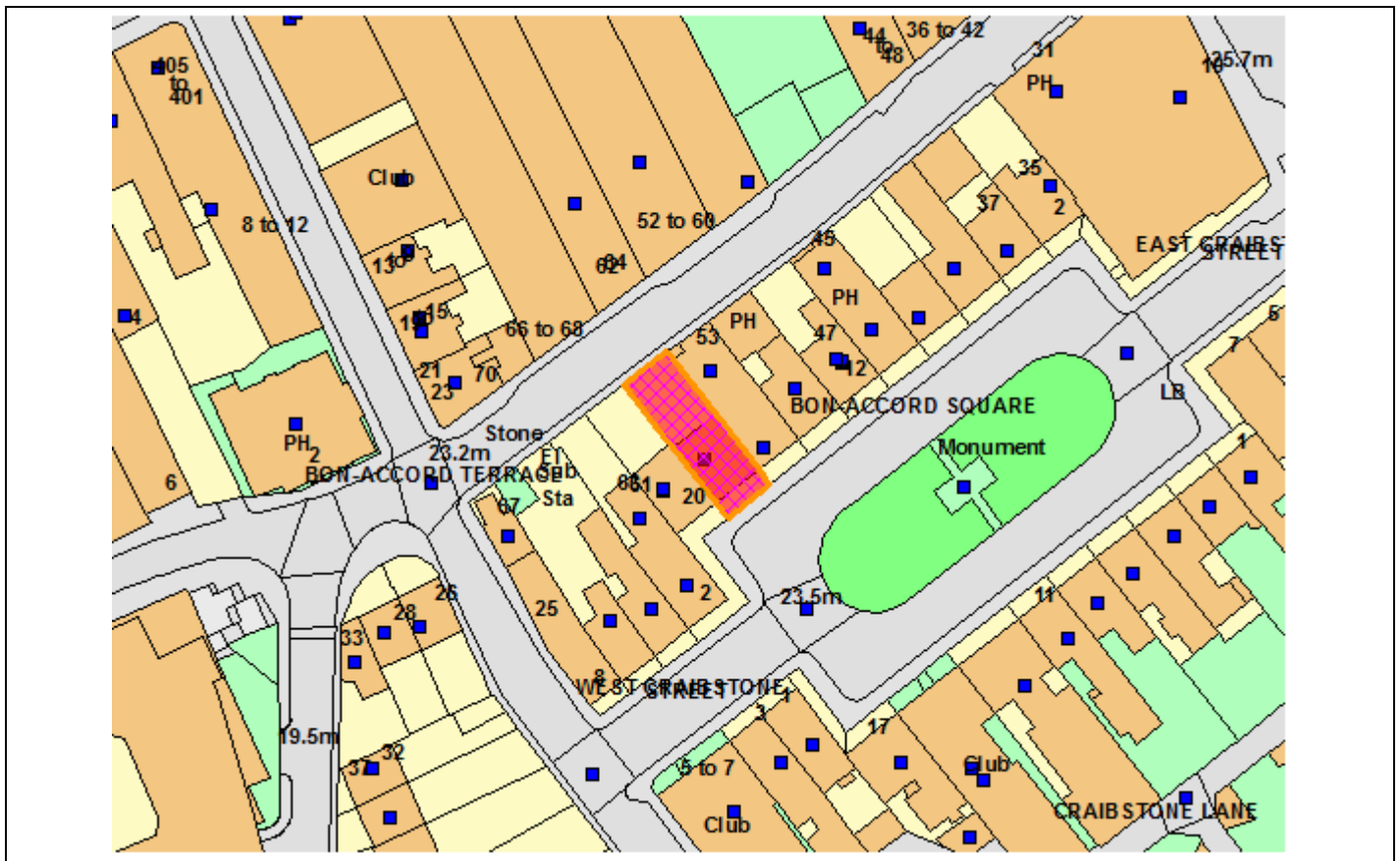


Planning Development Management Committee

Report by Development Management Manager

Committee Date: 18th January 2024

| | |
|---------------------------------|--|
| Site Address: | 18 Bon-Accord Square, Aberdeen, AB11 6DJ. |
| Application Description: | Change of use from class 4 (office) to class 7 (guest house) |
| Application Ref: | 231179/DPP |
| Application Type | Detailed Planning Permission |
| Application Date: | 26 September 2023 |
| Applicant: | CAJ UK PVT LIMITED |
| Ward: | Torry/Ferryhill |
| Community Council: | City Centre |
| Case Officer: | Gavin Clark |



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RECOMMENDATION

Approve Conditionally

APPLICATION BACKGROUND

Site Description

The application site comprises a mid-terraced property set over 4 levels, including attic and basement, on the northern side of Bon-Accord Square. This forms part of a traditional granite-built category 'B' listed terrace and is located within the Bon Accord Crescent/ Crown Street Conservation Area. The building is currently vacant but was last used as office accommodation. The rear curtilage is surfaced with tarmac and used as a car park, which is accessed via Langstane Place.

In terms of the surrounding area, the neighbouring premises at 16 Bon-Accord Square is in residential use, split into three flats at ground, first and attic floor level, with the adjacent property at 20 Bon Accord Square in office use (as a solicitors office). In terms of the wider area, there are a mixture of office and serviced accommodation (the Craibstone Suites are located at 15 Bon-Accord Square). To the rear, on Langstane Place are a number of public houses, restaurants and student accommodation and to the front is an area of landscaped open space with areas of car parking.

Relevant Planning History

None

APPLICATION DESCRIPTION

Description of Proposal

The proposal seeks detailed planning permission for a change of use of the premises from an office (Class 4) to guest house (Class 7). No external alterations to the property are proposed. Internally, the proposal would include six bedrooms located at basement and ground floor level, office and housekeeping facilities at first floor level and a dining area, lounge and laundry at second floor level. The proposals would also include five parking spaces and waste storage facilities, which would be accessed via Langstane Place (to the rear).

Amendments

Further information has been submitted since the application was originally validated including a site plan, floor plans and a planning statement along with further information to address comments received from colleagues in Roads Development Management and Waste Management. Neighbour re-notification was carried out on the 14th November 2023.

Supporting Documents

All drawings and supporting documents listed below can be viewed on the Council's website at: <https://publicaccess.aberdeencity.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=S1J4T4BZFZF0>

- Planning Statement

Reason for Referral to Committee

The application has been referred to the Planning Development Management Committee because an objection has been received from the City Centre Community Council. Consequently, the proposals fall outwith the Scheme of Delegation.

CONSULTATIONS

ACC - Roads Development Management Team – note that five parking spaces are proposed and there would be no shortfall in parking provision on site, as this would remain unchanged. Also note waste and collection methods are to remain as existing. Confirmed that they have no objection to the application.

ACC - Environmental Health – no objection/ observations.

ACC - Waste and Recycling – have no objection to the proposals following the submission of amended plans and clarification on the waste collection method. Their response will be discussed in greater detail in the evaluation section of this report.

City Centre Community Council – object to the application for the following reasons: visual impact and incompatibility with uses in the surrounding city centre area; inadequate waste management plan; lack of parking and impact on the surrounding road network; insufficient details provided on the submitted floor plans and elevations; impact on local infrastructure; and impact on residential amenity.

REPRESENTATIONS

The proposals have been subject to one letter of objection. The matters raised can be summarised as follows:

1. Overprovision of guest houses in the surrounding area and queries in relation to potential occupants on potential short term letting basis.
2. Floor plans have not been submitted to indicate proposed facilities and an indication should be provided in regards to the number of occupants.
3. A Fire Safety Plan should be submitted in support of the application.
4. Insufficient parking and inadequate spaces provided within the curtilage of the site.
5. Queries in relation to how waste would be managed.
6. The proposals would be detrimental to the area.

MATERIAL CONSIDERATIONS

Legislative Requirements

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where making any determination under the planning acts, regard is to be had to the provisions of the Development Plan; and, that any determination shall be made in accordance with the plan, so far as material to the application, unless material considerations indicate otherwise. Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires the planning authority to pay special attention to the desirability of preserving or enhancing the character and setting of listed buildings and the character and appearance of conservation areas.

Development Plan

National Planning Framework 4

National Planning Framework 4 (NPF4) is the long-term spatial strategy for Scotland and contains a comprehensive set of national planning policies that form part of the statutory development plan.

- Policy 1: Tackling the climate and nature crises
- Policy 2: Climate mitigation and adaptation
- Policy 3: Biodiversity
- Policy 7: Historic assets and places
- Policy 9: Brownfield, vacant and derelict land and empty buildings
- Policy 12: Zero waste
- Policy 13: Sustainable transport
- Policy 27: City, Town, Local and Commercial Centres
- Policy 30: Tourism

Aberdeen Local Development Plan (2023)

- H2: Mixed Use Areas
- VC1: Vibrant City
- D6: Historic Environment
- R5: Waste Management Requirements for New Development
- T2: Sustainable Transport

Aberdeen Planning Guidance

- Transport and Accessibility

Other Material Planning Considerations

- City Centre Masterplan (CCMP)

EVALUATION

Principle of Development

In terms of the principle of development, the site is allocated as H2 (Mixed Use Areas) in the ALDP 2023 which advises that applications for change of use within such areas must take into account the existing uses and character of the surrounding area and avoid direct conflict with adjacent land uses and amenity. In addition, development should not affect the amenity of people living and working in the area. Policy VC1 (Vibrant City) of the ALDP 2023 advises that proposals for new development, or expansion of existing activities, in the city centre, which support its vibrancy and vitality throughout the day and/or into the evening will be supported in principle.

In terms of NPF4, Policy 27 advises that *“development proposals that enhance and improve the vitality and viability of city, town and local centres, including proposals that increase the mix of uses, will be supported.”* Policy 30 (Tourism) of NPF4 is also considered to be of relevance, as this policy advises of issues that need to be considered in relation to such developments, including compatibility with surrounding uses, the contribution to the local economy, the impact on communities, opportunities for sustainable travel, accessibility and access to the natural environment.

The City Centre Masterplan (CCMP) identifies culture and tourism as contributing towards the vitality and vibrancy of the city centre, particularly in terms of creating visitor attractions and events that bring people into the city centre, comprising both local residents and tourists from further afield. In order to facilitate tourism in the city centre, it is important to ensure that a variety of different types of tourism accommodation are available, and guest houses are one such type of accommodation that is attractive to certain tourists or business travellers. It is therefore considered that the provision such accommodation within the city centre is compliant with the vision for the city centre as set out in the CCMP, and that the accommodation would likely provide wider benefits to the city centre hospitality sector, including the evening economy. Therefore, the proposed change of use is generally compliant with the requirements of Policies 27(a) of NPF4 and VC1 of the ALDP 2023.

As discussed above, the application property is situated within the city centre, as zoned in the ALDP Proposals Map. Bon-Accord Square and the surrounding area includes a variety of uses, including residential (in the adjacent premises), offices and other guest accommodation. As a result, the surrounding area contains a wide mix of uses, and the provision of such a facility is unlikely to have an adverse impact on the surrounding area, given the existing variety of uses and the nature of the development as proposed.

It is therefore considered that the small-scale nature of the application property (with a maximum of six bedrooms), combined with the mixed use context of the surrounding area, would ensure that its use as an guest house would not cause any significant harm to the amenity of the neighbouring mainstream residential properties and other uses found in the surrounding area, beyond the impacts to amenity which could occur if the property were to remain in office use.

It is therefore considered that the use of the property as an guest house would not cause significant harm to either the character or amenity of the area, in accordance with Policies 27(c) and 30(e)(i) of NPF4 and Policies VC1 and H2 of the ALDP 2023.

Policy 9 of NPF 4 advises that development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported. Given that the proposal relates to such a brownfield site, being a vacant office building, which would see the redevelopment of the site to provide a guest house, the proposals would comply with Policy 9 of NPF4.

Impact on Listed Building/ Conservation Area

The property is category 'B' listed and is located within the Bon Accord Crescent/ Crown Street Conservation Area. The proposal does not involve any external or internal alterations to the property. As a result, there would be no adverse impact on either the character or setting of the listed building, nor the surrounding conservation area. The proposal would see the property being given an appropriate new use and would therefore comply with Policy 7 of NPF4 and with Policy D6 of the ALDP 2023.

Transport & Accessibility

Policies 13 (Sustainable Transport) of National Planning Framework 4 (NPF4) and T2 (Sustainable Transport) of the ALDP 2023 both seek to ensure that all new development can be accessed via sustainable and active modes of transport, thus reducing dependency on the private car. The Roads Development Management Team has reviewed the proposal and note the property has sufficient parking, with five spaces provided within the rear curtilage of the property along with the waste collection arrangements, both accessed from Langstane Place. RDM raise

no objections to this arrangement and the proposals comply with Policy 13 of NPF4 and Policy T2 of the ALDP 2023.

Waste Management

Policy 12 (Zero Waste) of NPF 4 and Policy R5 (Waste Management Requirements for New Development) of the ALDP 2023 both advise that new developments should have sufficient space for the storage of general waste, recyclable materials and compostable wastes where appropriate.

In this case, the applicants have submitted information in support of the application, which has advised that there would be no on-site restaurant or bar facilities and the intention would be to utilise a conventional 240-litre wheelie bin. These are intended for storage in the existing strong room. The waste collection by a private contractor will take place on a three-day cycle with the bins being put out on the morning of collection.

In addition to this there is an area behind the parking entry gate that will remain unused so could also be utilised as a bin holding area should it be required. Provided the bin storage area would allow ease of access for the waste storage facilities (which it would) colleagues in waste management would have no concerns with the development as proposed. There would therefore be no conflict with Policy 12 of NPF4 and with Policy R5 of the ALDP 2023.

Tackling the Climate and Nature Crises, Climate Mitigation and Biodiversity

Policy 1 (Tackling the Climate and Nature Crises) of NPF4 requires significant weight to be given to the global climate and nature crises in the consideration of all development proposals. Policy 2 (Climate Mitigation and Adaptation) of NPF4 requires development proposals to be designed and sited to minimise lifecycle greenhouse gas emissions as far as possible, and to adapt to current and future risks from climate change. Policy 3 (Biodiversity) of NPF4 requires proposals for local development to include measures to conserve, restore and enhance biodiversity, proportionate to the nature and scale of development.

The proposed development, comprising the change of use of an existing property, with no associated external alterations, is sufficiently small-scale such that it would not make any material difference to the global climate and nature crises nor to climate mitigation and adaptation, nor are there any opportunities to minimise greenhouse gas emissions given the nature of the proposals. Therefore, the proposals are compliant with Policies 1 and 2 of NPF4. The proposed development would be wholly internal, small-scale and does not offer the opportunity for any biodiversity gain and the proposals are thus considered to be acceptable, despite some minor tension with Policy 3 of NPF4.

Community Council Representation

In terms of the comments received from the Community Council, it is noted that no external alterations to the property are proposed. The proposal would therefore have no adverse visual impact on the character or appearance of the surrounding area. In addition, there are a mixture of uses in the surrounding area and the use of the premises as a guest house is considered to be acceptable with no adverse impact on residential amenity. The proposed waste and parking arrangements have been assessed and found to be acceptable to relevant colleagues and the floor plans submitted are sufficient to indicate what has been applied for. The proposed use would have no adverse impact on surrounding infrastructure.

Matters Raised in Representation

1. Overprovision of guest houses in the surrounding area and queries in relation to potential occupants. *Response: There is no relevant planning policy consideration relating to the overprovision of guest houses. Through this application the planning authority is considering the principle of the proposed use, and the potential occupants of the premises is not a material planning consideration.*
2. Floor plans have not been submitted to indicate proposed facilities and an indication should be provided in regards to the number of occupants. *Response: Suitable floor plans and a site plan have been submitted in support of the application and this matter has been discussed elsewhere in the evaluation.*
3. A Fire Safety Plan should be submitted in support of the application. *Response: this is not required for a planning application of this nature. It is anticipated that this will be dealt with during the building warrant process.*
4. Insufficient parking and inadequate spaces provided within the curtilage of the site. *Response: sufficient parking is proposed within the curtilage of the premises.*
5. Queries in relation to how waste would be managed. *Response: this matter has been discussed in detail elsewhere in this report.*
6. The proposals would be detrimental to the area. *Response: the propose use is considered to be acceptable. It is also noted that no external alterations to the property are proposed.*

RECOMMENDATION

Approve Conditionally

REASON FOR RECOMMENDATION

The proposed change of use of the premises, which would see a vacant office building brought back into use as a guest house would be an acceptable form of development which would not have a significant adverse impact on the character or amenity of the area, including the listed building and surrounding conservation area, nor on the amenity of properties in the surrounding area. The proposals would therefore be in accordance with Policies 7 (Historic assets and places), 27 (City, Town, Local and Commercial Centres) and 30 (Tourism) of National Planning Framework 4 (NPF4) and Policies H2 (Mixed Use Areas), D6 (Historic Environment) and VC1 (Vibrant City) of the Aberdeen Local Development Plan 2023 (ALDP). The property's use as a guest house would contribute towards the vitality and viability of the city centre, and the vision for the city centre as set out in the City Centre Masterplan, in accordance with Policies 27 of NPF4 and VC1 of the ALDP.

The development would provide an alternative type of accommodation in the heart of the city centre; in an accessible location within walking distance of ample amenities, the city's main bus and railway stations and good public transport links, and would include on-site parking, in accordance with Policy 13 (Sustainable Transport) of NPF4 and Policy T2 (Sustainable Transport) of the ALDP.

The proposed development would have sufficient means for the adequate storage and collection of any waste and recyclables generated, in accordance with Policy 12 (Zero Waste) of NPF4 and Policy R5 (Waste Management Requirements for New Development) of the ALDP.

The proposed development, comprising the change of use of an existing property, with no associated external alterations, is sufficiently small-scale such that it would not make any material difference to the global climate and nature crises nor to climate mitigation and adaptation, nor are there any opportunities to minimise greenhouse gas emissions given the nature of the proposals, therefore the proposed development is compliant with Policies 1 (Tackling the Climate and Nature Crises) and 2 (Climate Mitigation and Adaptation) of NPF4. There is no opportunity to enhance on-site biodiversity, therefore the proposals are acceptable, despite some minor tension with Policy 3 (Biodiversity) of NPF4.

CONDITIONS

(01) DURATION OF PERMISSION

The development to which this notice relates must be begun not later than the expiration of 3 years beginning with the date of this notice. If development has not begun at the expiration of the 3-year period, the planning permission lapses.

Reason - in accordance with section 58 (duration of planning permission) of the 1997 act.

ABERDEEN CITY COUNCIL

| | |
|---------------------------|---|
| COMMITTEE | Planning Development Management |
| DATE | 18 January 2024 |
| EXEMPT | No |
| CONFIDENTIAL | No |
| REPORT TITLE | Draft Aberdeen Planning Guidance: Short-term Lets |
| REPORT NUMBER | PLA/24/013 |
| DIRECTOR | Gale Beattie |
| CHIEF OFFICER | David Dunne |
| REPORT AUTHOR | David Berry |
| TERMS OF REFERENCE | 5 |

1. PURPOSE OF REPORT

- 1.1 This report presents draft Aberdeen Planning Guidance on Short-term Lets (Appendix 1). The report seeks approval to undertake public consultation on the draft document, with the results of the consultation and any revisions to it to be reported back to the Planning Development Management Committee for approval within six months of the end of the consultation period.

2. RECOMMENDATION

That the Committee:-

- 2.1 Approve the content of the draft Aberdeen Planning Guidance on Short-term Lets (Appendix 1) and instruct the Chief Officer - Strategic Place Planning to, subject to any minor drafting changes, publish it for a six-week period of public consultation; and
- 2.2 Instruct the Chief Officer - Strategic Place Planning to report the results of the public consultation and any proposed revisions to the draft Aberdeen Planning Guidance to a subsequent Planning Development Management Committee within six months of the end of the consultation period.

3. CURRENT SITUATION

- 3.1 Members will recall that the new Local Development Plan 2023 was formally adopted on 19 June 2023. The Local Development Plan focuses on the vision, spatial strategy and key policies and proposals for the future development of Aberdeen.
- 3.2 The Council can also adopt additional supporting guidance in connection with the Local Development Plan and this can be used to provide more detail on how its policies and proposals will be implemented. Appendix 4 of the Local Development Plan outlines the Aberdeen Planning Guidance that is expected to be produced. The majority of this guidance was adopted in late 2023 (see Council Report COM/23/303).

- 3.3 A further draft Aberdeen Planning Guidance document is now proposed to cover the topic of short-term lets. The Local Development Plan specifically references the possibility of developing Aberdeen Planning Guidance on this subject.
- 3.4 As a result of the Civic Government Scotland Act 1982 (Licensing of Short-term Lets) Order 2022, local authorities were required to establish a licensing scheme for short-term lets by 1 October 2022. The Council's short-term lets licensing scheme was approved by the Licensing Committee on 6 September 2023. If a property meets the definition of a short-term let under licensing legislation, it will require a licence. However, it does not automatically require planning permission. As there are currently no short-term let control areas in Aberdeen, it is for the planning authority to decide if a proposed short-term let represents 'development' that will require planning permission. The draft Aberdeen Planning Guidance provides clarification on the factors that the Council will consider when determining whether or not a proposed short-term let will require planning permission.
- 3.5 Policy 30 of National Planning Framework 4 (Tourism) sets out national policy on the reuse of existing buildings as short-term lets. It sets out criteria to protect amenity and neighbourhood character, and to protect residential accommodation from loss unless it is outweighed by the local economic benefits of short-term letting. The draft Aberdeen Planning Guidance provides clarification on the local factors that the Council will take into account when assessing planning applications for short-term lets. It aims to ensure that proposals for short-term lets are assessed with a focus on local amenity, neighbourhood character and cumulative impact. The document will help applicants, planning officers and other stakeholders and will ensure a consistent approach to decision making.
- 3.6 Subject to Member approval, a six-week period of public consultation will be undertaken on the draft Aberdeen Planning Guidance. The draft document will be made available for inspection online and in Marischal College. The consultation will be publicised through means such as the Local Development Plan newsletter and the Council's website and social media platforms. Notification of the consultation will also be issued by email to potentially interested parties such as planning agents. Interested parties will be able to submit comments online using the Council's consultation hub (Citizen Space), or by email or post.
- 3.7 All comments will be reviewed and taken into account to help formulate a final version of the Aberdeen Planning Guidance on Short-term Lets, which will be reported back to Members for approval at a future meeting of the Planning Development Management Committee within six months of the end of the consultation period.

4. FINANCIAL IMPLICATIONS

4.1 There are no direct financial implications arising from this report as the cost of preparing Aberdeen Planning Guidance is met through existing staff time and resource budgets.

5. LEGAL IMPLICATIONS

5.1 There are no direct legal implications arising from this report. The proposed Aberdeen Planning Guidance will be a material consideration to inform decisions on future planning applications in Aberdeen.

6. ENVIRONMENTAL IMPLICATIONS

6.1 The draft Aberdeen Planning Guidance has been subject to a Strategic Environmental Assessment (SEA) pre-screening process in accordance with relevant legislation.

7. RISK

7.1 The assessment of risk contained within the table below is considered to be consistent with the Council's Risk Appetite Statement

Management Of Risk

7.2 The Local Development Plan 2023 was recently adopted. The draft Aberdeen Planning Guidance on Short-term Lets supports the Local Development Plan and ensures continuity in the provision of comprehensive, up-to-date and relevant planning frameworks.

| Category | Risks | Primary Controls/Control Actions to achieve Target Risk Level | *Target Risk Level (L, M or H) *taking into account controls/control actions | *Does Target Risk Level Match Appetite Set? |
|-----------------------|---|--|---|---|
| Strategic Risk | Not delivering the aims of the Aberdeen Local Development Plan and the Local Outcome Improvement Plan | Ensure that robust and transparent consultation is undertaken in a timeous manner on the draft guidance, and ensure that a final version of the guidance is adopted timeously. | L | Yes |
| Compliance | Ensuring compliance with National | Ensure that robust and transparent consultation is undertaken in a | L | Yes |

| | | | | |
|------------------------------|---|--|---|-----|
| | Planning Framework 4. | timeous manner on the draft guidance, and ensure that a final version of the guidance is adopted timeously. | | |
| Operational | By not providing guidance officers could, over time, provide inconsistent advice. | The draft guidance provides clarity, consistency and certainly in terms of assessment of planning applications. | L | Yes |
| Financial | Not having timeously published and adopted supporting guidance for the new Local Development Plan could lead to uncertainty at planning application stage and potentially lead to more staff time being spent processing applications | The draft guidance should reduce the number of queries and provide clarity, consistency and certainly in terms of assessment of planning applications. | L | Yes |
| Reputational | Not providing guidance opens the possibility of inconsistency in decision making and misinformation in the public domain. | The draft guidance sets parameters for the assessment of planning applications for short-term lets. | L | Yes |
| Environment / Climate | Ensuring that planning frameworks take into consideration | Ensure that robust and transparent consultation with statutory agencies is undertaken on the | L | Yes |

| | | | | |
|--|---|--|--|--|
| | the relevant environmental and climate change legislation at the point of their development and production. | draft guidance. Carry out SEA Pre-Screening in line with relevant legislation. | | |
|--|---|--|--|--|

8. OUTCOMES

| <u>COUNCIL DELIVERY PLAN 2023-2024</u> | |
|---|--|
| Impact of Report | |
| Aberdeen City Council Policy Statement <u>Working in Partnership for Aberdeen</u> | The proposals within this report support the delivery of the following aspects of the policy statement:- <ul style="list-style-type: none"> A vibrant city - making our city a better place for people to live, work, raise a family and visit. |
| <u>Aberdeen City Local Outcome Improvement Plan 2016-26</u> | |
| Prosperous Economy Stretch Outcomes | The draft guidance will help to support the achievement of stretch outcome 2, through supporting the local labour market. |
| Prosperous Place Stretch Outcomes | The draft guidance will help to support the achievement of stretch outcome 14 by promoting short-term lets in locations that are accessible by sustainable modes of transport. |
| Regional and City Strategies | <u>City Strategies and Strategic Plans</u> The APG will support the Aberdeen Local Development Plan 2023 through providing more information on the content of the Plan. It will ensure Aberdeen is an excellent place to live, visit and do business. |

9. IMPACT ASSESSMENTS

| Assessment | Outcome |
|--|--|
| Integrated Impact Assessment | Stage 1 and 2 assessment has been completed and no medium or high negative impacts have been identified that would require mitigation. |
| Data Protection Impact Assessment | Not required |

| | |
|--------------|-----|
| Other | N/A |
|--------------|-----|

10. BACKGROUND PAPERS

10.1 [Aberdeen Local Development Plan 2023](#)

10.2 [Full Council Report COM/23/303: Aberdeen Local Development Plan 2023 – Proposed Aberdeen Planning Guidance and Supplementary Guidance \(as approved 03 November 2023\)](#)

11. APPENDICES

11.1 Appendix 1 – Proposed Draft Aberdeen Planning Guidance: Short-term Lets

12. REPORT AUTHOR CONTACT DETAILS

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Aberdeen Planning Guidance: Short-term Lets (DRAFT)

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1. Introduction

1.1 Status of Aberdeen Planning Guidance

This Aberdeen Planning Guidance (APG) supports the Aberdeen Local Development Plan 2023 and is a material consideration in the determination of planning applications. The Local Development Plan does not contain a specific planning policy relating to Short-term Lets (STLs), however it states that APG may be provided on the topic. In providing guidance on STLs, this APG primarily relates to applicable zoning policies for each site and the following Local Development Plan policies:

- VC2 – Tourism and Culture
- D1 – Quality Placemaking
- D2 – Amenity
- T2 – Sustainable Transport
- T3 – Parking
- R5 – Waste Management Requirements for New Developments

This APG also supports Policy 30 (Tourism) of National Planning Framework 4 (NPF4), which states that proposals to change the use of existing buildings to STLs will not be supported where they would result in “*an unacceptable impact on local amenity or the character of a neighbourhood or area*” or “*the loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits*”. The APG provides guidance on how these criteria will be implemented in an Aberdeen context.

1.2 Introduction to Topic / Background

As a result of the Civic Government Scotland Act 1982 (Licensing of Short-term Lets) Order 2022, local authorities were required to establish a licensing scheme for STLs by 1 October 2022. The legislation was brought in to ensure STLs are safe, to address issues faced by neighbours, and to help local authorities understand what is happening in their area. A period between 1 October 2022 and 1 October 2023 was allowed to enable existing STL operators to apply for a licence and, if required, planning permission.

If a property meets the definition of an STL under licensing legislation, it will require a licence¹. However, it does not automatically require planning permission for use as an STL. As there are currently no STL control areas in Aberdeen (see more detail on STL control areas in section 2.1 below), it is for the planning authority to decide if the use of an existing property as an STL represents a 'material change of use'. If the proposal is considered to represent a material change of use, this constitutes 'development' that will require planning permission. This APG provides guidance on the factors that the Council will consider when determining whether the use of an existing property as an STL represents a material change of use such that it will require planning permission. It also provides guidance on the factors that the Council will take into account when assessing any planning applications for the change of use of an existing property to an STL.

1.3 Climate Change

The provision of STLs in locations which are accessible by a range of sustainable methods of transport can help to reduce carbon emissions related to transport and can therefore make a contribution to the built environment's transition towards net zero. The contents of this APG therefore relate to [UN Sustainable Development](#) Goal 11 (Sustainable Cities and Communities).

1.4 Health and Wellbeing

Where we live, where we work, and where we spend our time has an important influence on our health and wellbeing. How places are designed within their urban or natural environment is vital to the health of the people and communities within them. Maintaining a good mix of different housing types and tenures helps promote a sense of belonging and a sense of control.

This guidance can help to achieve the following Public Health Priorities for Scotland:

- Priority 1 – A Scotland where we live in vibrant, healthy and safe places and communities;
- Priority 3 – A Scotland where we have good mental wellbeing; and
- Priority 5 – A Scotland where we have a sustainable, inclusive economy with equality of outcomes for all.

¹ STL licensing is a separate process to the requirement for planning permission. The licensing of STLs in Aberdeen is administered by the Council's Private Sector Housing Unit. This APG does not provide guidance on STL licensing. More information on licensing requirements for STLs is available on the Private Sector Housing Unit's [webpage](#) and in their [Short-Term Lets Licensing Guidance Note](#).

This guidance is deemed to have minimal impact on the population health and wellbeing. This means that, whilst it is unlikely a Health Impact Assessment (HIA) screening report will be requested, this will depend on the detail and scope of the application. There may be elements of the proposals that relate to the health and wellbeing of the population that warrant consideration. If that is the case, then a screening HIA may be required.

2. Aberdeen Planning Guidance

2.1 Short-term Lets, Control Areas and the Need for Planning Permission

Short-term Lets (STLs) essentially involve the short-term provision of accommodation by a host in the course of business to a guest. Planning legislation sets out a more detailed definition of an STL and relevant extracts of this legislation are reproduced at Appendix 1.

Under Section 26B of the Town and Country Planning (Scotland) Act 1997 (as amended), Councils can choose to designate STL control areas. STL control areas allow authorities to consider STL proposals within specific geographically defined areas, to avoid concentrations of STLs and resulting detrimental impacts on amenity. An STL control area requires planning permission to be sought for any STLs within that area.

Outwith STL control areas, planning case law has confirmed that whether the use of a dwelling (houses or flats) for short-term letting amounts to a material change of use (and therefore constitutes 'development' that would require planning permission) is a question of fact and degree depending on the individual circumstances of the accommodation and its context.

No STL control areas have been designated to date by Aberdeen City Council. It is therefore for the Council to determine whether planning permission is required for any proposals to use an existing property as an STL based on the individual circumstances.

Where an existing building is not already in use as residential accommodation or tourist accommodation, planning permission will be required to change its use to an STL. New buildings for STL accommodation will also require planning permission.

Where an existing building is already in use as residential accommodation or tourist accommodation, planning permission may or may not be required to use it as an STL. In such cases the Council will consider on a case-by-case basis whether proposals would represent a 'material change of use' that would constitute development and therefore require planning permission. Key considerations will be the likely impacts on immediate neighbours, the wider local amenity and infrastructure of the proposed use in the proposed location. The likely extent of disturbance and impact on the sense of security of immediate neighbours from the use of the property as an STL by transient persons will also be a key consideration.

Relevant considerations that will generally assist the Council in determining whether an STL requires planning permission include (but are not limited to):

- Whether the property is to be used as an STL on a full-time or part-time basis;
- The number of people likely to be occupying the STL at any one time and the capacity of the property;
- The character of the property, whether a dwellinghouse or flat, including the number of bedrooms;
- Guest access to communal areas such as stairwells and gardens;
- Frequency and times of arrivals and departures for both guests and for cleaning / maintenance;
- The potential for noisy or otherwise antisocial activities; and,
- Potential impact on public services such as on-street parking and waste collection and whether the proposal is likely to result in undue pressure on those services.

Although to be assessed on a case-by-case basis, it is considered that in most circumstances the use of an existing house (not a flat) as an STL used on a single household basis is unlikely to represent a material change of use and is therefore unlikely to require planning permission. This will be subject to a general requirement that in all cases the proposed maximum occupancy level will appropriately reflect the size of the house and the context of the surrounding area.

Similarly, planning permission will not be required for letting rooms in a house (not a flat) where the letting is restricted to one bedroom in the house and it has fewer than four bedrooms in total, or where the letting is restricted to one or two bedrooms in the house and it has four or more bedrooms in total. The letting in these circumstances would be considered ancillary to the principal use as a dwellinghouse.

Planning permission is also not required for home sharing (apart from cases which would involve the creation of a new planning unit – e.g. an STL in an outbuilding).

However, the use of a flat in a traditional tenement or more modern block as an STL is more likely to represent a material change of use. This is due to the potential impact on neighbours and their residential amenity being generally greater through the introduction of an STL use into a tenement building or higher density accommodation due to the characteristics of shared access, parking and waste facilities, and the proximity of neighbouring flats and shared facilities. Flats are defined as Sui Generis (outwith a specific use class) within the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended). This is a different use category from a house, reflecting their different nature. The number of properties within the overall building will be taken into account when determining whether the use of a flat as an STL would represent a material change of use.

In cases where planning permission is required, this should be sought before applying for an STL licence through the Council's separate STL licensing process. Early engagement with the Council's Development Management team is therefore strongly recommended in order to determine whether planning permission will be required for any prospective STL developments. Details of the proposed STL can be emailed to pi@aberdeencity.gov.uk and the Development Management team will respond, by email, to confirm whether planning permission is required.

An appraisal of whether an application for planning permission for an STL is likely to be supported, and what information would be required to support a planning application, can also be obtained from the Development Management team by using the Council's [pre-application advice](#) service.

2.2 Assessment of Planning Applications

All planning applications for STLs will be treated on their own merits and will be assessed in line with relevant Development Plan policies and any other material considerations. A list of the main policies that are likely to be relevant to STL proposals is included in section 1.1. However, it should be noted that this list is not intended to be exhaustive and other policies may apply depending on the specific circumstances of individual developments.

In order to assess the likely impacts on amenity and character of the local area, and to ensure that these will be acceptable in accordance with relevant Development Plan policies, all planning applications for STLs will need to be accompanied by suitable supporting information covering the matters listed below. This information should be set out in an STL Planning Checklist. The matters that will be considered include:

- Whether the property is the only or principal home of the applicant;
- If the property is a flat, what floor of the building it is located on;

- The maximum number of occupants / guests that will use the STL at any one time;
- Whether the property is to be used as an STL on a full-time or part-time basis;
- Parking arrangements;
- Anticipated turnover of guests / length and frequency of stays;
- Arrangements for the storage and collection of waste from the property. (It should be noted that STLs are classified as a commercial / business use and applicants will therefore need to enter into a contract with the Council's Business Waste and Recycling team or another licensed waste contractor operating within the City to make appropriate arrangements for waste collection and disposal. Business waste should never be put into public or domestic bins and collection services are not covered by business rates. More information can be found on the Council's [webpages on business waste](#));
- How many other properties the STL shares an access and / or communal areas with;
- Details of any communal amenities and / or external amenity space that the property has access to; and,
- Character of the surrounding area, including existing uses.

A template STL Planning Checklist is available online (see link in Further Reading section below) and this should be used to ensure that the necessary supporting information is submitted with any planning application for an STL.

Where a proposal relates to the use of a flat as an STL, the Council will have particular regard to the presence of any existing STLs within the building and their total occupancy levels. This is because the presence of multiple STLs within a tenement or block of flats is likely to have a greater effect on the amenity of other residents through cumulative impacts. If it is considered that the introduction of a further STL into a building which contains an existing STL or STLs would result in unacceptable cumulative impacts on the amenity of other residents, planning permission will be refused.

2.3 Use of Conditions to Limit the Duration of Planning Permissions for STLs

Policy 30 of National Planning Framework 4 (NPF4) states among other things that proposals to change the use of existing buildings to STLs will not be supported where they would result in *“the loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits”*.

Given that STLs are generally expected to be used by tourists and / or business travellers, it is envisaged that businesses in the local tourism and hospitality sectors may experience some economic benefits as STL occupants are likely to use the services of these sectors. This is supported in general terms by the Scottish Government

publication "[Research into the Impact of Short-Term Lets on Communities Across Scotland](#)" (October, 2019). However, there is currently limited evidence on the local economic benefits of STLs in Aberdeen and this makes it difficult to undertake a detailed assessment of STL proposals against NPF4 policy 30. More such evidence may emerge over time.

Although the most recent Housing Need and Demand Assessment (HNDA) has demonstrated a need for new open market housing in Aberdeen, and that there is also a significant need for more affordable housing, there is not currently understood to be any significant additional pressure placed on local housing need by the conversion of existing residential accommodation to STLs in the City. In this respect, the situation in Aberdeen is different from other areas of Scotland where the number of STLs has placed significant pressure on the availability and affordability of housing (for example in Edinburgh and parts of the Highlands and Islands). At present, the loss of residential accommodation resulting from changes of use to STLs is therefore considered unlikely to have any significant detrimental impact on local housing need within Aberdeen.

Nevertheless, it is recognised that housing need and demand can be subject to significant change over time, and HNDAs are updated regularly (normally every five years) to ensure that conditions and changes in the local housing market are appropriately identified and understood.

The grant of planning permission for existing residential properties to be used as STLs on a permanent basis would potentially result in the permanent loss of residential accommodation which would otherwise be available to long-term residents of Aberdeen. Although STLs are not currently understood to be placing significant pressure on local housing need in Aberdeen, such permanent loss of residential accommodation is unlikely to accord with policy 30 of NPF4, particularly since data on the local economic benefits of STLs in Aberdeen is currently limited. As such, planning permissions to change the use of existing residential accommodation to STLs will generally only be granted for a time-limited period. This will normally be for a period of five years and this will be controlled through the imposition of a condition on the planning permission.

The use of conditions to control the duration of planning permissions for individual STLs will help to ensure that:

- Existing residential properties can automatically return to long-term residential use upon expiry of the STL permission (unless a new permission is granted to extend the STL use in the meantime);
- Local housing need, demand and supply can be kept under review and any significant changes in circumstances can be considered if a new planning permission is sought to extend the STL use; and,

- Any new evidence on the local economic benefits of STLs can be taken into account in accordance with NPF4 policy 30 if a new planning permission is sought to extend the STL use.

2.4 Certificates of Lawfulness of Use or Development

A Certificate of Lawfulness of Use or Development (CLUD) is a mechanism whereby a person can apply to a planning authority for confirmation as to whether planning permission for a proposed or an existing use of a property is required or not. Anybody can seek a CLUD if they wish to ascertain whether an existing use such as an STL is lawful, either on the basis that it does not represent a material change of use or that it has been in existence for a continuous period of ten years.

2.5 Guesthouses and B&Bs

Relevant provisions of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended) regarding Guesthouses and B&Bs apply irrespective of this document.

Class 7 of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended) permits use as a hotel, boarding house, guest house, or hostel, providing it is not a licensed premises.

Class 9 (houses) of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (as amended) permits use as a bed and breakfast establishment or guesthouse, where at any one time not more than two bedrooms are used for that purpose, or not more than one bedroom in the case of premises having fewer than four bedrooms as permitted development.

3. Further Reading

Short-term Lets Planning Checklist:

<https://www.aberdeencity.gov.uk/sites/default/files/2023-08/Short%20Term%20Let%20Accommodation%20Planning%20Supporting%20Information%20Checklist%20web.pdf>

Short-term Lets in Scotland – Planning Guidance for Hosts and Operators:

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2021/06/short-term-lets-scotland-planning-guidance-hosts-operators/documents/short-term-lets-scotland-planning-guidance-hosts-operators/short-term-lets-scotland-planning-guidance-hosts-operators/govscot%3Adocument/short-term-lets-scotland-planning-guidance-hosts-operators.pdf>

Appendix 1

Extracts from Town and Country Planning (Scotland) Act 1997 (As Amended) – Section 26B (Material Change of Use: Short-term Lets)

26B Material change of use: short-term lets

- (1) A planning authority may designate all or part of its area as a short-term let control area for the purposes of this section.
- (2) In a short-term let control area, the use of a dwellinghouse for the purpose of providing short-term lets is deemed to involve a material change of use of the dwellinghouse.
- (3) For the purposes of this section, the following tenancies do not constitute a short-term let—
 - (a) a private residential tenancy under section 1 of the Private Housing (Tenancies) (Scotland) Act 2016,
 - (b) a tenancy of a dwellinghouse (or part of it) where all or part of the dwellinghouse is the only or principal home of the landlord or occupier.

Extracts from Town and Country Planning (Short-term Let Control Areas) (Scotland) Regulations 2021 – Regulation 2 (Definition of a Short-term Let) and Schedule (Excluded Accommodation)

Short-term let

- 2.—**(1) For the purposes of section 26B of the Act, and subject to section 26B(3) of the Act, a short-term let is provided where all of the following criteria are met—
- (a) sleeping accommodation is provided to one or more persons for one or more nights for commercial consideration,
 - (b) no person to whom sleeping accommodation is provided is an immediate family member of the person by whom the accommodation is being provided,
 - (c) the accommodation is not provided for the principal purpose of facilitating the provision of work or services to the person by whom the accommodation is being provided or to another member of that person’s household,
 - (d) the accommodation is not provided by an employer to an employee in terms of a contract of employment or for the better performance of the employee’s duties, and
 - (e) the accommodation is not excluded accommodation.

- (2) For the purposes of this regulation, a person (“A”) is an immediate family member of another person (“B”) if A is—
- (a) in a qualifying relationship with B,
 - (b) a qualifying relative of B,
 - (c) a qualifying relative of a person who is in a qualifying relationship with B, or
 - (d) in a qualifying relationship with a qualifying relative of B.
- (3) For the purposes of paragraph (2)—
- (a) two people are in a qualifying relationship with one another if they are—
 - (i) married to each other,
 - (ii) in a civil partnership with each other, or
 - (iii) living together as though they were married,
 - (b) “a qualifying relative” means a parent, grandparent, child, grandchild or sibling,
 - (c) two people are to be regarded as siblings if they have at least one parent in common,
 - (d) a person’s stepchild is to be regarded as the person’s child,
 - (e) a person (“C”) is to be regarded as the child of another person (“D”), if C is being or has been treated by D as D’s child.

SCHEDULE

Excluded accommodation

1. Excluded accommodation means a dwellinghouse which is, or is part of—
- (a) a hotel,
 - (b) a boarding house,
 - (c) a guest house,
 - (d) a hostel,
 - (e) residential accommodation where care is provided to people in need of care,
 - (f) a hospital or nursing home,
 - (g) a residential school, college or training centre,
 - (h) secure residential accommodation (including a prison, young offenders institution, detention centre, secure training centre, custody centre, short-term holding centre, secure hospital, secure local authority accommodation or use as military barracks),
 - (i) a refuge,
 - (j) student accommodation,

(k) an aparthotel.

2. In this schedule—

“aparthotel” means a residential building containing serviced apartments where—

- (a) the whole building is owned by the same person,
- (b) a minimum number of 5 serviced apartments are managed and operated as a single business,
- (c) the building has a shared entrance for the serviced apartments, and
- (d) the serviced apartments do not share an entrance with any other flat or unit within the building,

“hostel” means a building in which is provided for persons generally or for any class or classes of persons, residential accommodation and either board or common facilities for the preparation of adequate food to the needs of those persons, or both,

“serviced apartment” means a residential flat or unit in respect of which—

- (a) services are provided to guests (such as housekeeping, telephone desk, reception, or laundry), and
- (b) there is a management regime in place to prevent anti-social behaviour and to impose limits in respect of the maximum occupancy of the flats or units,

“student accommodation” means residential accommodation which has been built or converted solely for the purpose of being provided to students

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