



## Pre-Application Forum

Report by Development Management Manager

**Meeting Date: 24 August 2023**

<b>Site Address:</b>	Land At Coast Road, St Fittick's Park/ Gregness Headland/Doonies Farm, Aberdeen,
<b>Description of Proposal:</b>	Proposed business/industrial development (class 4/5/6); road infrastructure; active travel connections; landscaping and environmental works including drainage and other infrastructure
<b>Notice Ref:</b>	230707/PAN
<b>Notice Type:</b>	Proposal of Application Notice
<b>Notice Date:</b>	8 June 2023
<b>Applicant:</b>	ETZ Ltd
<b>Ward:</b>	Torry/Ferryhill
<b>Community Council:</b>	Torry
<b>Case Officer:</b>	Lucy Greene



## **RECOMMENDATION**

It is recommended that the Forum –

- a) note the key issues identified;
- b) if necessary seek clarification on any particular matters; and
- c) identify relevant issues which they would like the applicants to consider and address in any future application.

## **APPLICATION BACKGROUND**

### **Site Description**

The development site consists of three linked areas – St Fittick's Park (A), Gregness (B) and Doonies (C). These areas are allocated for development in the Aberdeen Local Development Plan 2023 as follows: Zone A – OP56 (St Fittick's) and small section of OP62 (South Harbour); Zone B – OP62 (South Harbour) and Zone C – OP61 (Doonies)

The St Fitticks Park (A) area covers 15.5ha and includes the south east area of the park, with the Tullos Burn and wetlands, adjacent woodland, open space and a recreational area. The Scheduled Ancient Monument of St Fittick's Church is close to the northern boundary of this site.

Gregness (B) covers an area of 8.67ha is immediately adjacent to the coast and to a Site of Special Scientific Interest (SSSI), designated for geological reasons, with the Coast Road forming the boundary to the west. It was formerly coastal grassland but has been used more recently as a storage and production area in association with the construction of the new South Harbour in Nigg Bay immediately to the north of the site. Gregness is also covered by the Balnagask to Cove (Site 1) Local Nature Conservation Site (LNCS) designation. The LNCS includes mixed habitats

supporting herb rich grasslands, heathland, rocky cliffs, insect fauna and nesting sea birds. Access onto the south breakwater is taken through this site.

Doonies (C) includes a granite farmhouse and steading together with fields used by Doonies Rare Breeds Farm, a visitor attraction that is to close in August 2023. Two linear areas connect the main site to Peterseat Drive which is within the northern part of the Altens Industrial Area, to allow for potential future access linkages.

The River Dee Special Area of Conservation lies to the north of St Fittick's Park.

Footpaths, including core paths, the railway, cycle routes and Coast Road run through the sites. Residential areas in Balnagask and Torry lie close to the St Fitticks Park site to the north west and further away to the south of Doonies (Burnbanks Village).

## **Relevant Planning History**

Application Number	Proposal
230890/ESS	Proposed business / industrial development (Class 4/5/6) road infrastructure, active travel connections, landscaping and environmental works including drainage and other infrastructure

Decision – Screening opinion issued 9 August 2023, confirming EIA is required.  
Scoping Opinion to be issued shortly.

A Draft ETZ Masterplan was presented to Planning Development Management Committee on 29<sup>th</sup> June where it was agreed that the Draft Masterplan be subject to public consultation until 30<sup>th</sup> August 2023.

## **APPLICATION DESCRIPTION**

### **Description of Proposal**

The development would consist of the erection of buildings and laying of external hardsurfaced yard areas in business / office, industrial and / or storage and distribution use. This would be likely to include creating levels areas and buildings of relatively large footprint, representing a substantial change to the current undeveloped nature of the land. The end users of the development are unknown and it is not therefore possible to provide further details about characteristics of the development at this stage.

## **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.

### **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. The relevant provisions of NPF4 that require consideration in terms of this application are –

1. Tackling the climate and nature crises
2. Climate mitigation and adaptation
3. Biodiversity
4. Natural places
5. Soils
6. Forestry, woodland and trees
7. Historic assets and places
8. Green belts
9. Brownfield, vacant and derelict land and empty buildings
10. Coastal development
11. Energy
12. Zero waste
13. Sustainable transport
14. Design, quality and place
15. Local living and 20 minute neighbourhoods
18. Infrastructure first
19. Heat and cooling
20. Blue and green infrastructure
21. Play, recreation and sport
22. Flood risk and water management
23. Health and safety
24. Digital infrastructure
25. Community wealth building
26. Business and industry

#### Aberdeen Local Development Plan (2023)

The following policies are relevant –

##### B5 – Energy Transition Zone:

Within the areas identified as Energy Transition Zone on the Proposals Map, 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.

Infrastructural/transport improvements directly related to the wider Energy Transition Zone will be permitted where they have a functional requirement to be located there. Development proposals will be required to include suitable open space and landscape enhancements for the wellbeing of people and wildlife.

#### B4 – Aberdeen Harbours:

Within the areas zoned for Aberdeen Harbour on the Proposals Map, 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.

Residential and mixed use development within the area surrounding the harbour must take account of the character of the area and avoid undue conflict with adjacent harbour-related land uses. New development must not impinge upon the viability or operational efficiency of the harbour, or of existing businesses within the harbour zoned area. Mitigation measures may be required in order to permit uses which could otherwise give rise to such conflict.

Zone A – OP56 (St Fittick's) and small section of OP62 (South Harbour)

Zone B – OP62 (South Harbour)

Zone C – OP61 (Doonies)

OP56: Energy Transition Zone. 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.

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 European sites. This development proposal will be subject to a Habitats Regulations Appraisal (HRA) in order to consider potential effects on the qualifying interests of the River Dee SAC. As part of this process an adequate Construction Environmental Management Plan (CEMP) may be required although it is possible that this may be addressed subject to planning conditions. A Flood Risk Assessment is also required. Other issues which need to be addressed include water quality and habitats associated with the East Tullos Burn, heritage impacts, recreational access, habitat connectivity, compensatory planting and landscape buffering with residential areas.

Joint Masterplan needed for OP56, OP61 and OP62. The joint masterplan for OP56, OP61 and OP62 should consider the following matters:

- The extent of the developable area within the 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 wastewater 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.
- Ecological surveys to assess the presence of and effects on protected habitats and species will be required.

OP61 (Doonies): Energy Transition Zone. This area along with OP56 will support renewable energy transition related industries in association with Aberdeen South Harbour.

Similar requirements apply as for OP56.

OP62: Aberdeen Harbour expansion. Bay of Nigg Development Framework approved.

Similar requirements apply as for OP56.

WB1 – Healthy Developments: Developments are required to provide healthy environments, reduce environmental stresses, facilitate physical activity and promote physical and mental wellbeing. Requires a Health Impact Assessment to be submitted to enhance health benefits and mitigate any impacts on the determinants of health.

WB2 – Air Quality: An impact assessment will be required, together with mitigation measures.

WB3 – Noise: An impact assessment will be required, together with mitigation measures.

NE1 – Green Belt: Only a very small area of Green Belt is within the site area, this lies between the Doonies ETZ designation and the Peterseat Drive Industrial Area. The policy contains a presumption against development with certain exceptions. One of these exceptions notes roads that are planned through masterplanning of sites. It is likely that if these areas are proposed for development this would be for roads linking Doonies to Peterseat Drive.

NE2 – Blue and Green Infrastructure: This policy considers impact on rivers, wetlands, water courses and coastal areas (blue infrastructure) and the Green Space Network, which includes open space, woodlands, food growing areas (green infrastructure). It seeks to maintain the coherence of green networks for recreation, landscape, access, biodiversity and ecosystems, whilst not all of these will apply to every area of GSN, the policy seeks to retain and improve linkages between green areas for humans and wildlife, including paths.

NE3: Our Natural Heritage: Development should not damage sites, habitats, ecosystems or species protected by law or designation (national, regional or local), with geodiversity value. Alternatives must be considered, mitigation provided and overall biodiversity gains achieved. Detrimental effects, where unavoidable, must be outweighed by social, environmental or economic benefits. This policy states that Buffer Strips are required alongside watercourses, further guidance is provided in Aberdeen planning Guidance and NatureScot Guidance.

NE4: Our Water Environment: this would require Flood Risk Assessment and Drainage Impact Assessments to be submitted. This policy refers to Undeveloped and Developed Coast. St Fittick's (A) falls into Developed Coast, whilst Gregness (B) falls into both categories. There is a presumption against development in undeveloped coastal area, with some exceptions, including where a coastal location is required and where public access is maintained.

NE5: Trees and Woodland: Seeks to protect trees and woodlands, with mitigation required.

D1 – Quality placemaking: High Standards of design and layouts are required with design strategy to be submitted. Particular consideration needs to be given to visual impact, including consideration of materials and green roofs and walls.

D2 – Amenity: Including ensuring that refuse and recycling, cycle storage, low and zero technology and plant and services are sensitively integrated.

D3 – Big Buildings: Requires assessment of impact of big buildings on their context, although usually related to the city centre, this is of relevance in terms of visual impact.

D4 – Landscape – requires consideration of the impact on landscape setting of the city.

D5 – Landscape Design – requires design to be informed by a framework strategy.

D6 – Historic Environment: Requires assessment of impact on setting of nearby Scheduled Ancient Monuments (SAMs), including St Fittick's Church and the Cairns on Tullos Hill.

D7 – Our Granite Heritage: Seeks retention of all granite buildings. Doonies Farmhouse and Steading would require to be considered under this policy.

R5 – Waste Management – Sufficient space requirements for storage and collection of refuse and recycling.

R6 – Low and Zero Carbon Buildings and Water Efficiency

R8 – Heat Networks

I1 – Infrastructure

T1 – Land for Transport

T2 – Sustainable Transport: Transport Assessments and Travel Plans will be required.

T3 – Parking

CI1 – Digital Infrastructure – all new commercial development is expected to have access to high speed communications.

B1 – Business : Small area adjacent to Peterseat Drive falls into this designation

B4 – Aberdeen harbours: Presumption in favour of harbour infrastructure and ancillary uses with functional requirement to be there. New development must not impinge on the use of the harbour.

### **Interim Aberdeen Planning Guidance**

Aberdeen Planning Guidance is Interim Planning Guidance. The documents hold limited weight until they are adopted by the Council. The weight to be given to Interim Planning Guidance prior to its adoption is a matter for the decision maker. The following guidance is relevant –

- Natural Heritage
- Open Space and Green Infrastructure
- Flooding, Drainage and Water
- Air Quality
- Waste Management Requirements for New Developments
- Resources for New Developments
- Landscape
- Big Buildings
- Transport and Accessibility
- Outdoor Access
- Trees and Woodland
- External Materials and Their Use – including on green roof and wall infrastructure

### **Other National Policy and Guidance**

- NatureScot – Developing with Nature Guidance

### **Other Material Considerations**

- ETZ Masterplan (Draft) – Currently in draft form, expected to be adopted prior to determination of a PPI application.
- Regional Transport Strategy – improvements to Coast Road as link to South Harbour and active travel corridor.
- Sustainable Urban Mobility Plan (SUMP) – Local Transport Strategy
- Climate Change Plan (2018-2032)
- Draft Energy Strategy and Just Transition Plan (2023)

## **PRE-APPLICATION CONSULTATION**

Two public events were held:

Event 1- Thursday 29th June, 3pm-8pm

The first consultation event included a series of boards which provided information on the site and emerging proposals with the opportunity to comment, raise issues or ask any questions to members of the Project Team.

Event 2- Thursday 3rd August, 3pm-8pm

A second consultation event provided further developed proposals and responses to issues previously raised with the opportunity to comment, raise issues or ask any questions to members of the Project Team.

In addition, throughout the consultation period, questions or comments could be made by:

- Phone - (0131) 550 6500 (Mon - Fri, 9am - 5.30pm)
- Email – [etz@ironsidefarrar.com](mailto:etz@ironsidefarrar.com)
- Post 111 McDonald Road, Edinburgh, EH7 4NW.

Consultation material was published online to a dedicated ETZ website (<http://www.ironsidefarrar.com/etz.htm>), allowing those unable to attend the event to review and comment on the proposals.

The event was advertised as follows:

- Proposal of Application Notice was sent to Aberdeen City Council, Torry Community Council, Cove & Altens Community Council and Local Members for Torry / Ferryhill Ward and Kincorth / Nigg / Cove Ward.
- A local flyer-drop advertising the event to c. 9,000 residential addresses within communities of Torry, Balnagask and Cove.
- Circulation of a consultation event flyer via email to all attendees of previous ETZ Consultation Events that have provided contact details and wish to be kept informed about further consultations.
- Circulation of a consultation event flyer to local community media and groups and organisations with capacity to circulate: SHMU/Torry Vision, Old Torry Community Centre, Altens Community Centre, Balnagask Community Centre, Tullos Management Committee, Torry Community Group, King's Community Church, Tullos Community Garden, Old Torry Heritage Group, Torry Library, Cove Library, Greyhope Bay, Cultivate Aberdeen, Torry People's Assembly, St Fittick's Church, Jesus House, Sacred Heart Roman Catholic Church, Friends of St Fittick's, Big Noise Torry, GREC, Balnagask Golf Club, Deeside Family Resource Centre
- A newspaper notice advertising the consultation arrangements and events was published at least 7 days before the events took place in accordance with Regulations.

## **NECESSARY INFORMATION TO SUPPORT ANY FUTURE APPLICATION**

As part of any application, the applicant has been advised that the following information would need to accompany the formal submission –

Environmental Statement (Environmental Impact Assessment (EIA) Development) – many of the documents included below will be within the ES. This will be established by the outcome of the scoping opinion.

Health Impact Assessment

Air Quality Impact Assessment

Natural Heritage Assessment (see requirements of Policy NE3)

Preliminary Ecological Appraisal (PEA);

Protected and Notable Species Report;

Wintering Birds Survey;

Breeding Birds Survey.

Habitats Regulations Appraisal ;

Tree Survey and Arboricultural Impact Assessment

Construction environmental management plan

Flood Risk Assessment

Drainage Impact Assessment

Replacement Planting and Protection Plan

Landscape Strategy and Plan

Design Strategy

Transport Assessment

Travel plans

Landscape and Visual Assessment;

Heritage Assessment.

## **RECOMMENDATION**

It is recommended that the Forum –

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