

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 17 July 2020.

We recommend that you keep a copy of your representation for your own records.



ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

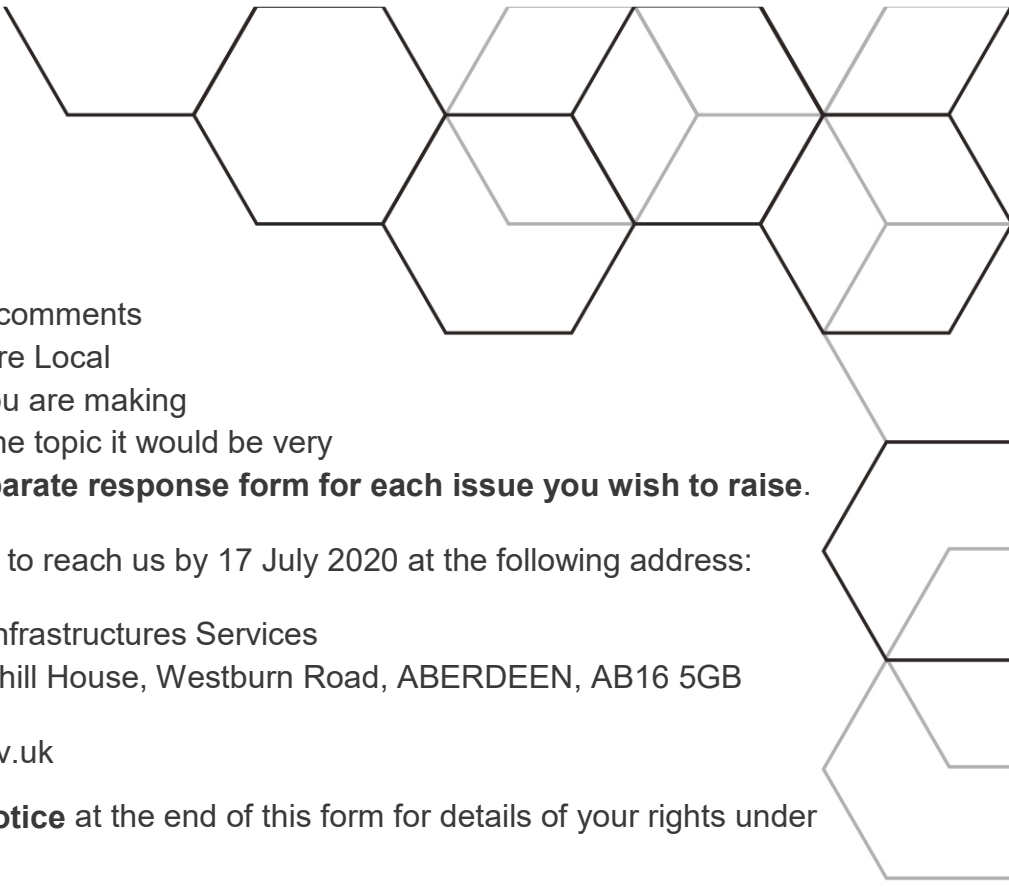
Tel: 01467 536230

Email: ldp@aberdeenshire.gov.uk

Web: www.aberdeenshire.gov.uk/ldp

Follow us on Twitter [@ShireLDP](https://twitter.com/ShireLDP)

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.



Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in a **separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 17 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: ldp@aberdeenshire.gov.uk

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

YOUR DETAILS

Title:	Mr
First Name:	Andrew
Surname:	Fido
Date:	27 July 2020
Postal Address:	Savills, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

Are you happy to receive future correspondence only by email? **Yes**

Are you responding on behalf of another person? **Yes**

If yes who are you representing? **National Grid Gas plc**

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

An acknowledgement will be sent to this address soon after the close of consultation.

YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

Whilst the overall policy approach set out in the Proposed LDP to the National Grid Gas asset of the St Fergus Gas Terminal is supported, our client seeks an amendment to the detailed policy wording to support their possible future aspirations for a low carbon/renewable energy development at the Site.

Such a change would allow National Grid (NG) greater flexibility to address the common SG and NG objectives for 'net zero' and the decarbonisation of the UK energy system, and would sit alongside, and be entirely compatible with, the existing policy support for carbon capture and storage at the Site, which NG supports.

Specifically the changes sought are as follows, with existing LDP text shown in italics and the proposed changes shown as red underlined and/or strikethrough):

LDP Section 12: Protecting Resources

Policy PR2 Reserving and Protecting Important Development Sites

PR2.2 National developments that directly affect the area covered by this Plan include proposals for contribution to capturing and storing carbon and making use of heat generation. Carbon Capture is specifically promoted at the St Fergus Gas Terminal but also at other locations associated with the pipeline from the central belt to St Fergus. High-voltage electricity transmission infrastructure, including cabling, substations, and converter stations, will be at a range of locations but are expected to include sites associated with the electricity substation south of Peterhead.

PR2.3 Where we know about the above, we have identified them in the relevant Settlement Statements typically identified as 'Reserved Land'. In addition, appropriate low carbon and renewable energy generation proposals will also be supported at the St Fergus Gas Terminal.

LDP Appendix 7(b) Settlement Statement Buchan: St Fergus Gas Terminal

Vision

Situated between Peterhead and Fraserburgh, St Fergus Gas Terminal opened in 1977. The Terminal's strategic location in the northeast has meant it has and continues to play a key role within the UK's gas industry. Any future development should be oil, ~~and~~ gas, ~~or~~ carbon capture or low carbon related and, where possible, contribute towards employment within the area.

Settlement Features, R1 Reserved Land

Reserved Land R1 -'For major oil and gas related development within at St Fergus Gas Terminal, including carbon capture and storage, and low carbon/renewable energy generation.

Section 13: Climate Change
Policy C2 Renewable Energy

C2.1 We will support solar, wind, biomass (energy from biological material derived from living, or recently living organisms) and hydro-electricity developments which are in appropriate sites and of the appropriate design. We treat biomass schemes as industrial processes suitable for business land. These may be hazardous developments through their impact on air quality. This support is not at the expense of other policies regarding Natural Heritage, Built Heritage and Protecting Resources. In the interests of helping to achieve Net Zero, particular support will also be provided for renewable energy schemes that provide a direct supply of renewable energy to a high energy user, such as the St Fergus Gas Terminal.

Reason for change:

Whilst fully supportive of the policy acknowledgement that land at the St Fergus Gas Terminal should be reserved for major oil, gas and carbon capture and storage related development, National Grid considers that the existing policy wording should be further widened to confirm that an element of low carbon / renewable energy generation at the Gas Terminal would also be acceptable.

This change is required to better reflect Scottish Government's (SG) ambitions for tackling climate change and achieving 'net zero', which in our view requires express support for well-established renewable energy technologies at the St Fergus Gas Terminal, in addition to support for the rapidly emerging technology of carbon capture and storage.

SG Commitments

SG has recently announced significant and legally binding policy commitments and updates which include the declaration of a 'climate emergency' and, most importantly, a net-zero greenhouse gas ambition by 2045. Whilst section 13 of the Proposed LDP describes climate change as '*possibly the greatest challenge facing the world today*' this appears to be a 'roll forward' of the wording from the current LDP which should be updated to refer to the raft of more recently published climate change legislation, policy ambitions and other recently published documents, which set out key measures required to address this challenge, specifically:

- Planning (Scotland) Act 2019
- National Infrastructure Assessment (NIA) (July 2018)
- Intergovernmental Panel on Climate Change (IPCC) - October 2018 Report
- Climate Change (Emissions Reduction Targets)(Scotland) Act 2019, which amends the Climate Change (Scotland) Act 2009

In terms of the amended Climate Change (Scotland) Act 2009, this now represents the most ambitious, demanding and binding greenhouse gas reduction target in the world, requiring:-

- interim target of a 70% reduction in emissions (compared to 1990 levels) by 2030;
- interim target of a 90% reduction in emissions (compared to 1990 levels) by 2040;
- and,
- an overall net zero greenhouse gas emissions target for 2045.

These commitments represent a significant step change in the Scottish Government's increasing efforts to tackle climate change. As the Scottish Planning system has a key role in in tackling climate change and reducing greenhouse gases (as per the outcomes defined at Section 2(4) of the 2019 Planning Act), it would be beneficial if the Proposed

LDP provided policy support for a wider range of low carbon technologies on the 'reserved land' at the St Fergus Gas Terminal site as set out above.

NG Commitments

In addition such a change would accord with NG Commitments.

NG recognises that decarbonisation of the energy system is one of the biggest challenges facing our world and that it has a critical role to play in the acceleration towards a cleaner future. In response NG made a commitment in November 2019 to reduce its own direct greenhouse gas emissions to net zero by 2050 (see <https://www.nationalgrid.com/stories/journey-to-net-zero/national-grids-net-zero-commitment>).

NG is currently investigating a range of initiatives to achieve that commitment and believes there may be a potential role for renewable energy generation at the St Fergus Gas Terminal, in addition to the identified role for carbon capture and storage. In principle a direct renewable electricity supply to the Gas Terminal would assist in reducing greenhouse gas emissions and thus contribute to the net zero objective.

Conclusion

NG seek the above modifications to: Policy PR2 *Reserving and Protecting Important Development Sites*; LDP Appendix 7(b) *Settlement Statement Buchan: St Fergus Gas Terminal*; and, Section 13: *Climate Change Policy C2 Renewable Energy* so that express policy support is provided for renewable energy development at the St Fergus Gas Terminal, in addition to the existing support for carbon, capture and storage to provide further flexibility in meeting the SG and NG commitments to address climate change and achieve 'net zero'.

PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

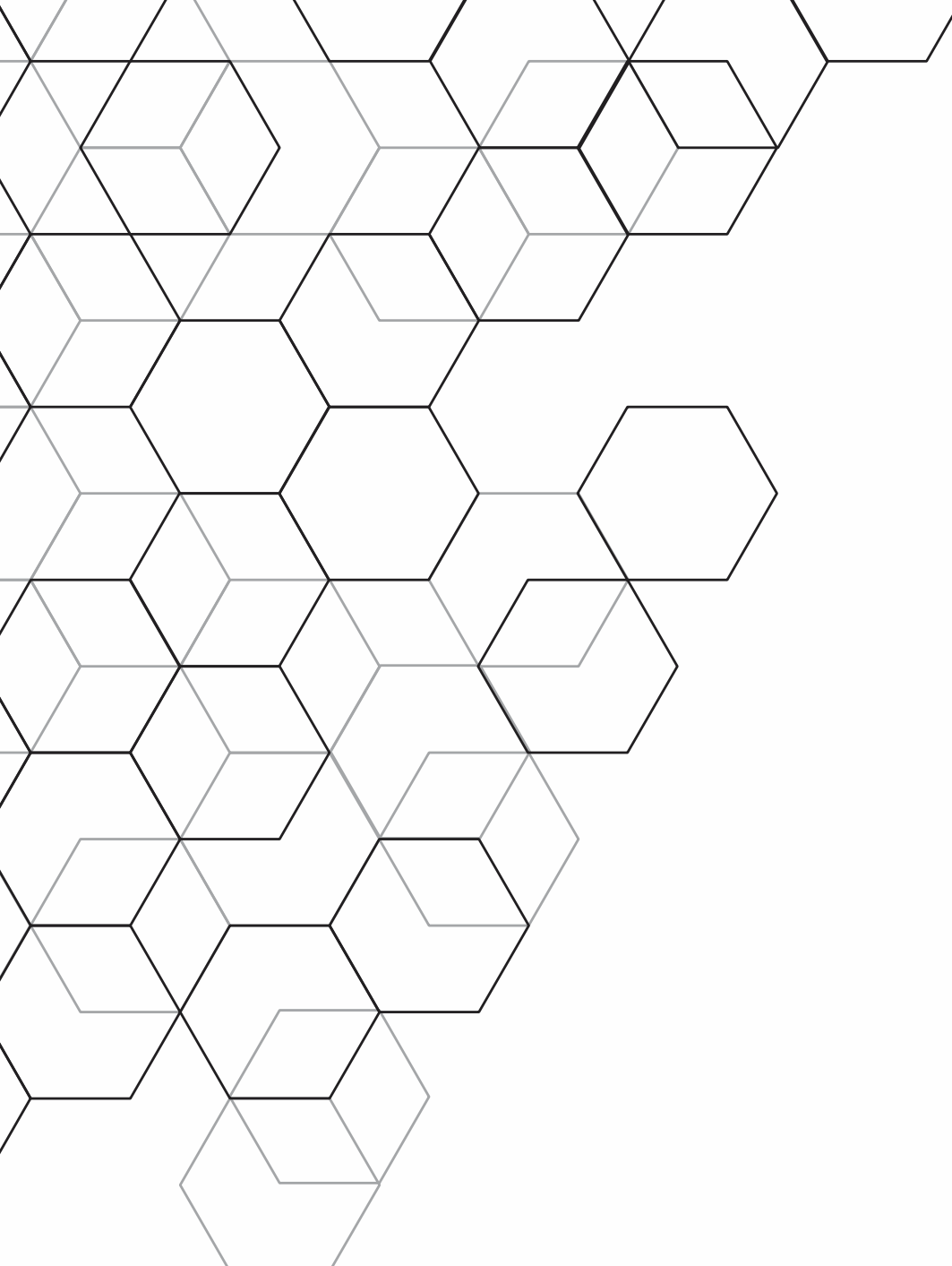
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.

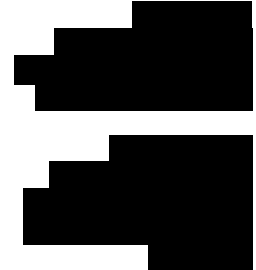


29 July 2020
28 July 2020-NG Reprs-covering letter



Aberdeenshire Council

By email only to:
ldp@aberdeenshire.gov.uk



Dear Sir or Madam

Representations to the Aberdeenshire Local Development Plan 2020 Consultation: May – July 2020 on behalf of National Grid Gas Plc

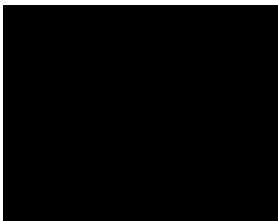
National Grid Gas Plc has appointed Savills to review and respond to the above consultation with specific reference to their landholding and operational assets at the St Fergus Gas Terminal which are identified on the attached plan. This response should be read alongside that submitted by Avison Young who also act for National Grid in the role of asset protection.

The enclosed response seeks some minor changes to the proposed LDP policy wording applicable to the reserved land at the Terminal. In summary the changes seek additional policy flexibility that would help support possible future aspirations for renewable energy generation on a sub-component of the NG landholdings at the Site.

This flexibility would assist NG in meeting their commitment to reduce their own direct greenhouse gas emissions to net zero by 2050, and help decarbonise the UK energy system. In NG's view there should be express policy support for well-established renewable energy technologies on a sub-component of the reserved land at the St Fergus Gas Terminal, in addition to the existing policy support for the rapidly emerging technology of carbon capture and storage, which is recognised as valuable and welcomed.

Overall the policy changes sought are considered to better reflect the Scottish Government's (SG) own ambitions for tackling climate change and achieving 'net zero' as set out in the amended Climate Change (Scotland) Act 2009, which the Scottish Planning system is charged with playing a key role in achieving (as per the outcomes defined at Section 2(4) of the 2019 Planning Act).

Yours sincerely



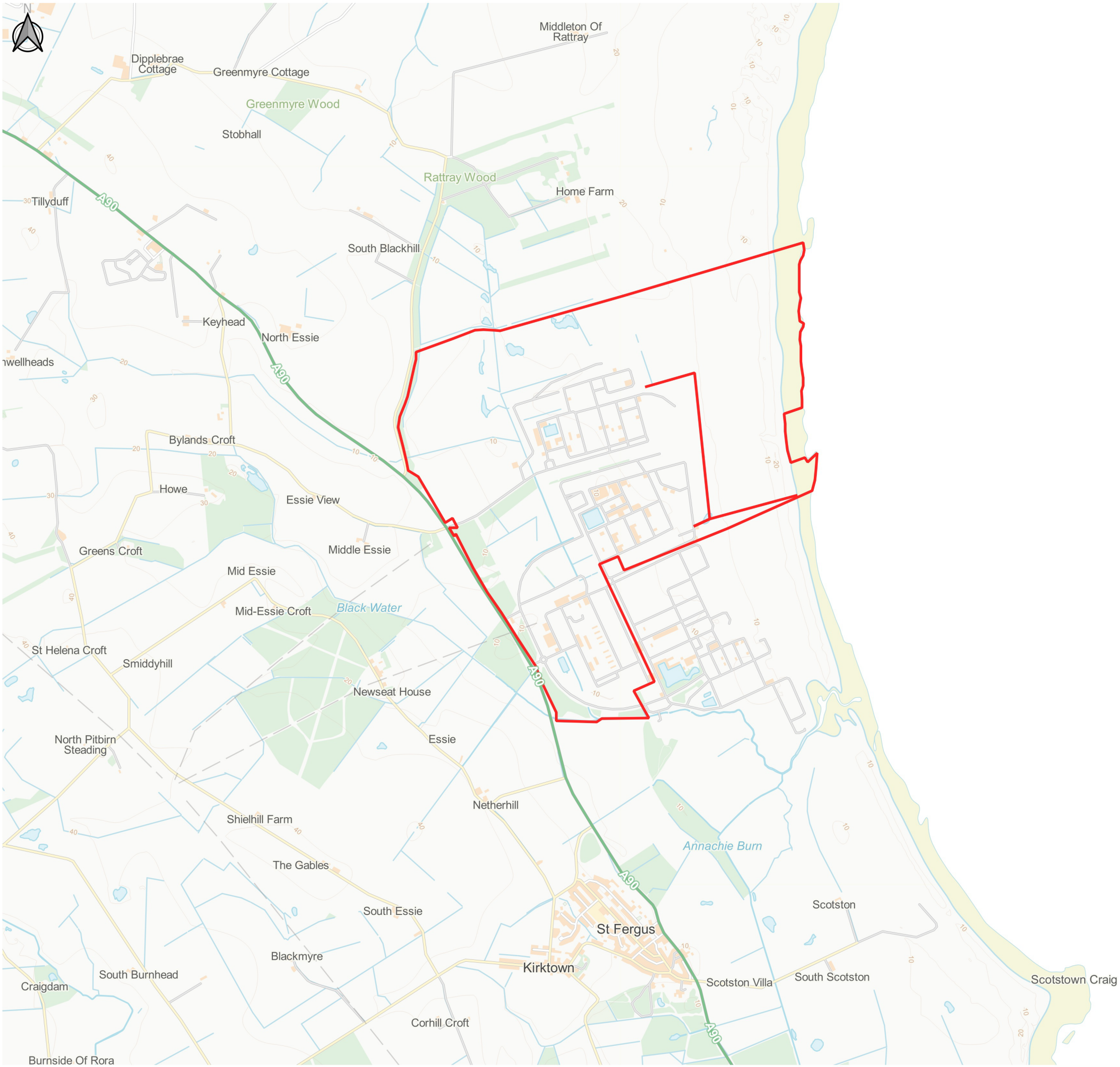
Director

Enc: Location Plan
Response Form

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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St. Fergus Gas Terminal, Aberdeen

Ref:	Site location plan
Date:	21-07-2020
Paper size:	A3
Scale:	1:20000

Site boundary