

**GVA James Barr**

19 September 2014

Policy Team  
Planning and Building Control  
Infrastructure Services  
Aberdeenshire Council  
Woodhill House  
Westburn Road  
Aberdeen  
AB16 5GB

SUBMISSION No. 048	
ISSUES RAISED	
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SUPPORTING DOCS	



Quayside House  
127 Fountainbridge  
Edinburgh EH3 9QG  
T: +44 (0)8449 02 03 04  
F: +44 (0)131 469 6001

[gva.co.uk/scotland](http://gva.co.uk/scotland)

**BY EMAIL ONLY**

Dear Sir/Madam,

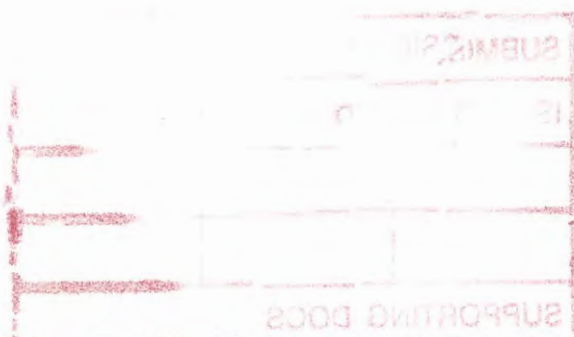
**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN – MAIN ISSUES REPORT ADDENDUM 2014  
REPRESENTATIONS ON BEHALF OF INFINIS (REFERENCE NUMBER 1483)**

GVA [REDACTED] has been instructed by Infinis to submit representations to the Main Issues Report (MIR) Addendum 2014 of the emerging Aberdeenshire Local Development Plan (LDP), in respect of the Wind Energy paper (previously Main Issue 5). These are submitted further and in addition to the original representations we made to the LDP MIR in January 2014.

Infinis currently has two operational wind farms in Aberdeenshire at Hill of Fiddes and Gordonstown Hill. Infinis is also progressing planning applications for wind farms in Aberdeenshire at Stony Hill (5 turbines), Hill of Fishrie (5 turbines) and Tibberchindy (6 turbines). Infinis therefore clearly has a strong interest in emerging LDP policy in Aberdeenshire and makes these representations in this context.

Firstly we welcome Aberdeenshire Council's (AC) decision to publish an Addendum to the MIR for public consultation, in direct response to the Scottish Planning Policy (SPP) which was recently published in June 2014, subsequent to the MIR 2013. SPP states that, 'The purpose of the SPP is to set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land.' (paragraph i, page 2) As the SPP is of national importance and intended to promote consistency in the application of policy across Scotland (whilst allowing sufficient flexibility to reflect local circumstances), it is therefore important that all new Development Plans reflect the provisions of SPP. The preparation timescale for Aberdeenshire's new LDP allows for this, through the current Addendum process. We consider this to be the correct, transparent approach, as SPP states, '(The SPP) directly relates to:

- The preparation of development plans;
- The design of development, from initial concept through to delivery; and
- The determination of planning applications and appeals.' (paragraph i)



As such we welcome AC's 'Figure 1 Revised Spatial Framework for Wind Energy Development' in the Addendum, which duly reflects the provisions of 'Table 1: Spatial Frameworks' set out in SPP at page 39. In comparison with the previous version of AC's Spatial Framework (Figure 3) in the original 2013 MIR, a significantly greater part of Aberdeenshire is now identified as areas where wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria. We consider this a more appropriate, fairer, approach because it supports a greater emphasis on the case by case assessment of wind energy development proposals where detailed assessment criteria apply to the consideration of proposals (as set out in paragraph 169 of SPP and within LDP policies). We support this shift in policy as it will best ensure robust scrutiny of wind energy developments, placing the onus on applicants to demonstrate a convincing, thorough case, which we consider is best made and considered at the detailed site level through the planning application process.

We are pleased to note that there is no reference in the Addendum to the revised spatial framework for wind energy development having been informed by the Council's Strategic Landscape Capacity Assessment (SLCA) document (Draft October 2013). The SLCA has not been published in any formal capacity, and particularly not as part of the LDP review process. Further, SPP makes no reference to Landscape Capacity Studies, and we support AC's approach to omit any such evidence from the revised spatial framework within the Addendum also.

Secondly, we support AC's 'Preferred Option' set out within the Addendum regarding wind energy, that in this case the development industry should assess and seek AC's agreement through the planning application process that their proposal is unlikely to lie within the 'visual envelope' of settlements, or otherwise does not have a visual impact on that settlement (rather than AC undertaking the exercise for 120 settlements), in order that the LDP is not delayed. This appears the sensible way forward. It is relevant to stress here that any actual effect on 'communities' will depend on such variables as intervening topography and screening (vegetation / structures). This should be noted in emerging LDP policy.

We trust the above is helpful and will be considered as the Aberdeenshire LDP review progresses. In the meantime, we look forward to receiving confirmation of receipt.

Yours faithfully



**PRINCIPAL PLANNER  
FOR AND ON BEHALF OF GVA GRIMLEY LTD**

c.c. 