

Policy Team,
Planning & Building Standards,
Infrastructure Services
Aberdeenshire Council
Woodhill House
Westburn Road
Aberdeen
AB16 5GB

19 September 2014

Dear Sir/Madam,

Aberdeenshire Local Development Plan 2016, Main Issues Report Addendum – August 2014

Thank you for the opportunity to comment on the above document. Scottish Renewables is the representative body for the renewable energy industry in Scotland with over 320 member organisations across all renewable energy technologies.

Scotland's renewable energy sector is now a major part of our economy, supporting well over 11,600 jobs and generating investment of over £1.5bn in 2012 alone, and is key to our environmental ambitions, delivering the equivalent of over 40% of electricity demand from renewable sources and displacing more than 10 million tonnes of CO2 in 2012. This progress means we are currently on track to meet our ambitious renewables targets for 2020.

Scottish Renewables welcome the opportunity to offer our input into the addendum for the proposed Main Issues Report (MIR) which is an important step in shaping Aberdeenshire Council's Local Development Plan.

We hope that this response will contribute towards shaping the Local Development Plan into an appropriate and useful tool for planners, developers, land owners, communities and individuals as they contribute towards Scotland's renewable energy future.

Should you wish to discuss our response or have any queries, please don't hesitate to get in touch.

Yours Sincerely,


Policy Manager - Onshore Renewables

REFERENCE No.	049
ISSUES RAISED	
SUPPORTING DOCS	



Aberdeenshire Local Development Plan 2016, Main Issues Report Addendum

Spatial Framework

Scottish Renewables is concerned with Aberdeenshire Council's approach to spatial frameworks which has been produced in accordance with draft Scottish Planning Policy (SPP). This approach is contrary to guidance provided to all local authorities by John McNairney, Chief Planner at the Scottish Government in May 2013 which reminded planning authorities that "until the documents are finalised, the current Scottish Planning Policy 2010 remains the Scottish Government's national planning policy for decision making purposes" (Annex 1).

The approach to spatial frameworks detailed in the final SPP as published in June 2014 differs markedly from that of the draft SPP and as a result, Aberdeenshire Council's approach is not in line with planning policy. The MIR should take account of the finalised policy which was published in June 2014 and as such, the spatial framework needs to be revisited, particularly in relation to the areas of significant protection listed on page 17 of the MIR Report 2013 Renewable Energy Position Paper.

Aberdeenshire Council should revisit their Spatial Framework to ensure it is in accordance with the finalised SPP. Although not an exhaustive list of the differences between the draft and finalised SPP, some issues which should be considered are as follows:

Development Management

Many of the issues highlighted in the spatial framework, for example, cumulative impact and areas of flood risk should not be included in the spatial framework but should instead be considered at the development management stage in line with the finalised SPP.

Separation Distances

The framework includes a separation distance of 2.5km whereas SPP 2014 sets a requirement for "Community separation for consideration of visual impact: An area not exceeding 2km around cities, towns and villages identified on the local development plan with an identified settlement envelope or edge. The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement." This change should be reflected in the MIR.

Wild Land

The Core Areas of Wild Land map can be used to help inform spatial plans but it is important to note SNH's advice on using the map which states, "*The map provides greater clarity and certainty for development management. However the particular characteristics and intensity of wildness that is found will vary across a wild land area and the detail of that variation may not always be picked up in a desk based analysis and broad brush approach we have used to defining these areas. Consideration of individual proposals and their potential effect on wildness and areas of wild land will require individual field assessment.*"¹

This relates to wording in SPP which says that developments should to be able to demonstrate on a case-by case basis that any potential negative effects can be overcome if a development is proposed in a core wild land area.

Treatment of Carbon Rich Soils and Peat

Scottish Renewables recognises the value of peatland ecology and biodiversity and the important role that these landscapes play in terms of storing carbon. In recognition of this, consideration of peatlands and carbon emissions are an integral part of the development process for onshore wind and are reflected

¹ CORE AREAS OF WILD LAND 2013 MAP, Scottish Natural Heritage's Advice to Government – 16th June 2014
<http://www.snh.gov.uk/docs/A1323989.pdf>

throughout the planning system to ensure that the right renewables developments are proposed and built in the right places.

The planning process takes into account both ecological impacts through the Environmental Impact Assessment process and carbon impacts through the Carbon Calculator. There are also additional steps taken to protect peatlands through good practice guidance developed jointly by industry, government and agencies. As indicated in Scottish Planning Policy, developments on carbon rich soils, deep peat and priority peatland habitat will be required to demonstrate that they can substantially overcome any significant effects on the qualities of these areas.

These steps are taken as part of the development management process and the Aberdeen MIR should reflect this in its final form. This approach is particularly important given the difficulty in accurately mapping large areas of peat. Feedback from members suggests that the data used in the current draft stems from the SNH carbon richness map which is derived from the Macaulay Soil Map of Scotland. These maps should not be used to pre determine any impact a renewables development has on peat given their broad scale and the time since their publication. Instead, the council should ensure that the tools and assessments available in the form of the carbon calculator and EIA assessment are used to ensure only developments with acceptable impacts are taken forward and that these are judged on a case-by-case basis.