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In 2014 Scotland Welcomes the World



By email to: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Our ref: A9358197  
29 September 2014

Dear Policy Team

**ABERDEENSHIRE COUNCIL – LOCAL DEVELOPMENT PLAN 2016  
MAIN ISSUES REPORT ADDENDUM 2014  
CONSULTATION RESPONSE FROM THE SCOTTISH GOVERNMENT**

Thank you for consulting the Scottish Government on Aberdeenshire Local Development Plan (LDP) 2016 Main Issues Report (MIR) Addendum 2014. I am responding on behalf of the Scottish Government including Historic Scotland and Transport Scotland.

We have structured our response to follow the format of the MIR Addendum itself. Comments from Historic Scotland and Transport Scotland are included in Annex 1. For the avoidance of doubt, reference to SPP in this letter relates to SPP 2014.

**Wind Energy**

We are generally content that the Figure 1 diagram complies with the Spatial Framework requirements as defined in SPP. We note the preferred option the Council is seeking to take on community separation areas. There is an opportunity for the Council to refine this at a later stage, for example, through Supplementary Guidance consistent with LDP timescales. However we anticipate that future Plans would be prepared on the basis of the refined approach to ensure that position is reflected in the main body of the LDP.

We note the reference to the Council agreeing to develop a policy in line with what was presented as the "preferred option" in the 2013 MIR. We consider that the approach set out does not adequately tie the spatial framework to development proposals. It should be clear when a proposal is within an area of community separation for consideration of visual impact and such consideration will therefore be undertaken at the planning application stage.

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## Landscape Capacity Study

If there are significant concerns in the area relating to cumulative impact and remaining landscape capacity then we would support the use of a landscape capacity study (LCS) to assist in developing policy to complement the spatial framework. This would ensure the LCS conclusions are accounted for in the development management process. In so doing a clear description of how the spatial framework interacts with the supplementary landscape capacity study should be given. If the LCS is to inform policy considerations, then it should be subjected to appropriate scrutiny through public consultation. It would be expected that individual merit considerations on elements such as turbine height will be used in development management. It would be inappropriate, for example, to use the LCS heights as absolute limits and be the determining factor in decision making processes. Whilst we support the use of a LCS in assisting with wind energy planning considerations, they should only provide a steer on development management considerations, not be the determining factor in decisions.

There is an expected role for landscape capacity studies which can:

- be useful tools in identifying cumulative impact issues;
- help identify strategic and local area capacity;
- assist in developing cumulative impact objectives or scenarios, and
- assist in setting landscape change thresholds to manage change and future impacts.

## Strategic Capacity

SPP paragraph 162 states that *"Both strategic and local development planning authorities, working together where required, should identify where there is strategic capacity for wind farms, and areas with the greatest potential for wind development, considering cross-boundary constraints and opportunities. Strategic development planning authorities are expected to take the lead in dealing with cross-boundary constraints and opportunities and will coordinate activity with constituent planning authorities"*.

Our position is that strategic capacity can be thought of as the general areas (rather than the precise locations) within group 3 of the spatial framework (i.e. areas with potential for wind farms), which are largely or entirely free from group 1 and 2 constraints.

Once the spatial framework criteria set out in SPP Table 1 have been applied, SDPs and LDPs will identify Group 3 areas with potential for wind farms subject to other policy criteria. Within these areas strategic capacity can, if necessary, be safeguarded through policy that restricts smaller-scale development. In some development plans within their 5-year review, that new or revised pattern will emerge over the longer term when first-generation turbines mature and an area's capacity can be reconfigured, for example, through a spatial policy prioritising large-scale wind farm repowering.

In the meantime, in areas where wind turbine development has already taken place, it may be desirable for SDPs to support clustering and consolidation of smaller developments in order to form larger wind farms provided the function of intervening gaps is not significant locally and cumulative effects are manageable. In some instances this could help to limit landscape and visual impact elsewhere, potentially releasing additional capacity and avoiding more sporadic forms of development with wider cumulative effects. The use of landscape capacity studies is encouraged to identify areas with additional capacity and management of cumulative impacts.

For the avoidance of doubt it is not envisaged that all indicative areas of strategic capacity will be fully built out given the criteria-based approach of SPP para 169 and LDP policy considerations. The purpose of identifying areas with strategic capacity would be to provide a supportive policy framework and steer for the development industry.

A SDP landscape capacity study, or assemblage of individual authority LCSs can help to inform strategic and local development plan coverage of strategic capacity. A landscape capacity study, based on a turbine height typology, may very well indicate that there is potential to accommodate wind turbines in areas. Out of those mapping exercises should flow a further map indicating strategic capacity. Over time the landscape capacity study could assist in establishing capacity thresholds for landscape change and help to manage cumulative impacts. Where LCSs inform an SDP's approach to strategic capacity, they may help steer LDP spatial frameworks particularly at the Council boundaries, to ensure there is appropriate read-across.

SPP states that development plans should indicate the minimum scale of onshore wind development that their spatial framework is intended to apply to. Planning authorities may set this out in terms of generating capacity, physical size or number of turbines. However, it will generally be useful to formulate development plan policies which steer individual and small groups of small wind turbines away from areas with strategic capacity

## Heat Networks

We are supportive of the preferred approach as proposed. SPP paragraphs 157-160 are clear on what is expected of LDPs in relation to heat. We would recommend exploration of opportunities in the Strategic Growth Corridor Locations identified in the SDP in addition to those locations identified in the MIR.

We would recommend to supplement the preferred option for the LDP that the plan identify any intentions to help address fuel poverty in the area. The Scottish Government's Towards Decarbonising Heat: Maximising the Opportunities for Scotland: Draft Heat Generation Policy Statement 2014 outlines the case to reduce the pressure on household energy bills; thereby assisting to address fuel poverty. The Draft Heat Generation Policy statement envisages a significant increase in renewable heat networks in off-gas grid areas. Paragraph 159 of SPP is clear that local development plans should support the development of heat networks in as many locations as possible. Paragraph 158 of SPP identifies communities off the gas grid as being areas of heat demand for particular consideration for taking advantage of co-location of heat supply sources including developments producing unused excess heat. The LDP has an opportunity therefore to identify and promote the development of heat networks in:

- a) small settlements that are off the gas grid and
- b) settlements close to manufacturing, such as distilleries.

Paragraph 168 is clear that Development Plans should identify areas which are weakly connected or unconnected to the national grid and facilitate the development of decentralised and mobile energy storage installations.

We would also encourage LDP planning policy to support exploration of geothermal energy sources. The Scottish Government has commissioned a study into the potential for deep geothermal energy in Scotland. The study's conclusions included the Grampian Highlands

region which is recognised as potentially having high heat production granite and therefore, potentially, large stores of geothermal energy.

<http://www.scotland.gov.uk/Publications/2013/11/2800>

<http://www.scotland.gov.uk/Publications/2013/11/6383>

Paragraph 158 of SPP notes the potential of geothermal heat sources. We understand from the study "Accounting for palaeoclimate and topography: A rigorous approach to correction of the British geothermal dataset" that the Ballater area has geothermal potential and we would expect provision to be made for geothermal sourced heat networks to be supported by the LDP.

### **Land Supply and Distribution**

Scottish Planning Policy states that, "They (*Local development plans in city regions*) should provide for a minimum of 5 years effective land supply at all times." Table 3 of the Addendum indicates that the five year effective supply at 2014 is in excess of the Structure plan housing requirement for 2014 – 2018.

Please do not hesitate to contact me, should you have any questions regarding this response.

Kind regards

  
**Robin Campbell**  
**Senior Planner**

## ANNEX 1

### **Historic Scotland**

Historic Scotland have reviewed the MIR Addendum and have the following comments to make in relation to their historic environment interests:

#### Revised Spatial Framework for Wind Energy

It is stated in paragraph 2.4 (p.2) that only national wildlife and landscape designations; areas of wild land identified by SNH; carbon rich soils and areas not exceeding 2km from settlements identified in LDP are covered in the 'Areas of Significant Protection' in SPP 2014. It has been overlooked that World Heritage Sites, Inventory Gardens and Designed Landscapes and Inventory Historic Battlefields are also included within Group 2: Areas of significant protection. Historic Scotland would wish to highlight this omission.

#### Heat Networks

We suggest that any framework that is developed as part of heat networks/ district heating mapping exercise should take into account potential impacts on the historic environment. For example, there may be visual impacts on heritage assets from large scale buildings/ chimneys forming part of heat generation developments.

#### Additional Development Sites to Meet Local Needs

The proposed new allocations at Old Meldrum (FM101 & FM102) are located within **Inventory Battlefield of Barra** and the Council have not referred to this fact in either the proposals' overview section (p. 10) or the Environmental Report.

The two sites are on the edge of the battlefield, some distance from where the main clash is believed to have taken place (in the vicinity of Bruce's Field to the south of Old Meldrum). In terms of the impact on the battlefield landscape, this area of the battlefield has already been significantly altered due to the recent westward expansion of the town and these proposed development areas will be seen as part of the town. We can therefore confirm that Historic Scotland does not have any significant concerns with what is proposed at both sites. However, any future development should still have appropriate archaeological mitigation measures in place and the Council should make the applicants aware of the battlefield designation and its boundaries.

### **Transport Scotland**

Transport Scotland has reviewed the Aberdeenshire LDP Main Issues Report Addendum and note that this details revisions to the Wind Energy, Heat Networks and Land Supply main issues as set out on the LDP MIR published in October 2013. In terms of the revisions to the land supply main issue, Transport Scotland observes that confidence is retained in the housing sites currently allocated within the adopted Local Development Plan as a result of new evidence in the form of revised household projections, an updated Housing Land Audit (2014) and Action Programme (2014). This new evidence shows that there is a sufficient amount of housing allocated and that sites are progressing, therefore they will continue to be allocated for delivery in the new LDP. This backs up the preferred option within the MIR of not allocating significant additional housing within the 2016 LDP.

In terms of the additional sites at Portsoy, Old Meldrum or Tarves, Transport Scotland have no formal comments to make at this stage but will continue to work with Aberdeenshire Council as they develop the appraisal of their plan in line with DPMTAG guidance.

