



**Aberdeenshire Local Development Plan 2016
 Consultation on Main Issues Report Addendum**

Comments from Bennachie Community Council

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Comments submitted on behalf of Bennachie Community Council by:

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Question 1

Do you have any comments on the Revised Spatial Framework for Wind Energy Development, or the proposal to require the development industry to assess the "visual envelope" of settlements through the planning application process?

BCC appreciates that, in theory, the preferred option for ensuring compliance of the Proposed Plan with SPP2014 has much to commend it. Adopting this course of action would ensure that the Proposed Plan would be published on schedule and, perhaps more importantly given the current financial constraints within which Aberdeenshire Council has to operate, it would shift the financial burden for compliance from the Council to the development industry. However, there are important unresolved issues as detailed below.

1. BCC takes exception to the following statement on onshore wind energy policy in para 2.6 of the addendum: "...we are of the view that the overall importance of this issue does not justify the delay of the publication of the plan." The high number of responses to Main Issue 5 - Wind Energy showed that, for many people, this was the most important issue in the MIR. In fact the addendum itself states (para 2.1) that this issue "...generated a large number of comments and confirmed to us the level of concern that households in Aberdeenshire had regarding the impact of wind turbines on residential amenity...".
2. BCC notes that, on the subject of visual envelopes, SPP2014, Table 1, page 39 states: "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." BCC believes that this is a clear indication that SPP2014 places responsibility for identification of the 'visual envelope' of a settlement with the Council.
3. BCC believes that in the use of statements such as "...serious impact on the timing of the preparation of the plan..." (para 2.5), and "...extensive work that would be required..." (para 2.6), the MIR addendum has over-stated the difficulty, potential delay and, by inference, the cost of compliance with SPP2014. Determination of these envelopes for turbines of differing heights is a relatively simple procedure using viewshed analysis, which is included in most GIS software. Such analysis may be based on a single point or may be calculated from multiple points on a line, e.g. at points along a settlement boundary. BCC therefore disagrees that this would involve extensive work, or that it would result in serious delay, especially if contracted out to a company specialising in such analysis.
4. How will the Council guarantee that delineation of visual envelopes is performed in a totally fair and impartial manner? Will use of a so-called independent specialist by the applicant be specified in policy? Will the Council's planning department verify visual envelopes submitted in support of applications? Will the Council engage the services of its own specialised contractors to carry out such verification? Given the lack of information on this in the MIR addendum, BCC is not convinced that the Council can guarantee that visual envelopes are determined in an impartial way, i.e. in a way that does not favour the applicant for a particular development at the expense of the local community.
5. Under Item 010 (Main Issue 5 - Wind Energy) in the minute of the special meeting of the Garioch Area Committee held on 27 and 28 May 2014, the Committee agreed to recommend to Infrastructure Services Committee "3. that clarification be provided that the height is always measured to hub height and a second measurement to top of blade height should be identified in documents". Will the visual envelopes be based on hub height or height to the blade tips? BCC believes that visual envelopes should be based on maximum blade tip height if loss of amenity and erosion of quality of life due to blade shadow flicker are to be avoided. Again the MIR addendum lacks information on this and requires clarification.

In view of the above points Bennachie Community Council is unable to support the preferred option stated in para 2.5 of the addendum, and hereby wishes to declare its support for the reasonable alternative outlined in paragraph 2.6.

Questions 2 (heat networks), 3 (land supply) and 4 (additional development sites to meet local needs)

Bennachie Community Council has no comment.