

Review of SG LSD2: Layout, siting and design of new development

1. Introduction

- 1.1 The purpose of this paper is to examine SG LSD2: Layout, siting and design in light of changes in the national policy and local context. It will consider whether it meets the requirements of Scottish Planning Policy and other national planning documents, and whether it forms a sound basis for addressing the layout, siting and design of development proposals in Aberdeenshire.

2. Approach

- 2.1 The purpose of this policy is to improve the standard of development layout, siting and design in Aberdeenshire. It is not prescriptive in terms of the outcome of the design process, but instead sets out a series of design related questions which should be rigorously applied during this process to ensure a high standard of development design. Firstly, though, criterion 1 requires developments to “conform with any agreed development brief, design statement or design code prepared for the site; AND.” This statement could be potentially misleading as SG LSD2 should also be applied to proposals which do not have an associated development brief, design statement or masterplan. It also fails to make explicit reference to design briefs. Minor amendments are therefore necessary to provide clarity on these points.

- 2.2 Criterion 2a requires developments to demonstrate an optimal “response to the site’s context including consideration of:

- i) the local climate (it’s response to cold, wind, rain, snow and solar gain); and
- ii) respect for its setting (its relationship to the existing landscape, townscape and neighbouring features); AND”

This criterion highlights the importance of considerations of context in terms of creating a successful development. It particularly highlights the two main contextual considerations for developments, setting (including landscape and townscape) and local climate (prevailing winds, solar gain etc), though it provides flexibility so that other contextual issues can be taken into account.

Considerations of context are crucially important in terms of creating a successful development, so the emphasis given to this issue in SG LSD2 is appropriate.

- 2.3 A need for developments to “optimise the resource-efficiency and appropriate use of materials, including consideration of embodied energy, reuse of construction materials, compactness of built form, and how well the materials relate to each other” is addressed in criterion 2b. This criterion requires developers to minimise the environmental impact of their developments through the efficient use of resources. Planning advice expands on this by providing detail of the factors that should be considered when assessing the efficiency of new developments. However, the policy does not set out specific efficiency standards that need to be met and does not provide a sufficiently clear focus on the sustainability of new developments. This issue will be discussed further in section 3.

- 2.4 Criterion 2c requires developments to demonstrate a considered response to:

- “i) its basic functions (provision of privacy, amenity, security, warmth, homeliness etc); and

- ii) support systems (sustainability of heating, lighting, water and waste systems over the design’s lifetime, including the use of water-saving technology); and
- iii) connectivity (practicality and environment-friendliness of its access and servicing arrangements); and
- iv) flexibility to adapt to the changing circumstances of its occupants”

Although these issues seem rather disparate, considering them under the banner of “basic functions” is a useful way of grouping them together for consideration as a whole. Again, planning advice should be used in tandem with this section of the supplementary guidance to allow each criteria to be considered in detail. This approach, where all of the detail that backs up the policy is contained within planning advice, is appropriate as it allows the policy to be suitably concise. In terms of amendments, the word “homeliness” should be deleted as the planning advice fails to provide a clear definition or means of assessment. The use of this term is therefore potentially confusing. The requirement for developers to demonstrate the sustainability of all support systems also seems rather onerous given that developers have to meet carbon reduction standards set out in SG LSD11 anyway. A new policy on water conservation will also ensure the sustainability of water systems. Some amendments are therefore required.

2.5 Criterion 2d addresses a development’s aesthetics and layout, and the influence this has on the creation of local identity and an attractive environment. 2d requires developments to demonstrate a suitable response to the creation of local identity, “including consideration of:

- i) the balance of the development (mixture of house types and other building types and land-uses); and
- ii) the creation of a sense of place (the quality of urban and landscape design, incorporation of public art or craftwork, biodiversity etc); and
- iii) aesthetics (the unity and rhythm of all the design elements and features); and
- iv) visual appeal (the design’s “feel-good” quality, style etc)”

It is crucially important that each of these issues are addressed by new developments if we are to avoid the bland, placeless developments that have been seen across the UK, including Aberdeenshire. It is therefore appropriate that this criterion focuses on these issues. However, the term “feel good quality” is potentially unhelpful in this context as it arguably too “woolly” to gain sufficient credence with the development industry. This could be replaced with reference to the need for developments to create a welcoming environment. This term arguably has greater credibility as it is explicitly linked to national policy (which will be further discussed below).

2.6 More broadly, some re-wording of the policy is required to ensure that it is clear and easily understandable. Further text should also be added to the reasoned justification to clarify that some policy criteria do not apply to every type and scale of development. Reference should also be made to the relevant planning advice and technical advice note. The rural development stakeholder group has also highlighted the requirement for biodiversity enhancements in new developments to be moved from SG NE2 to SG LSD2.

3. Background

National context

- 3.1 The Scottish Government has placed considerable emphasis on improving architecture and urban design as part of its “place-making agenda.” Scottish Planning Policy (SPP) emphasises the importance of high quality design which creates sustainable places of a distinctive character and identity. National Planning Framework 2 (NPF2) also highlights the importance of good design and design policies to the reduction of carbon dioxide emissions and regeneration. This commitment to design can also be seen in ‘Designing Places’ and ‘Designing Streets’ which communicate the Scottish Government’s policy approach to development design. Designing Places sets out the Scottish Government’s broad aspirations for development design and the role of the planning system in delivering them. It identifies “six qualities – identity, safe and pleasant spaces, ease of movement, a sense of welcome, adaptability and good use of resources” - which underpin good urban and rural design and the creation of successful new places. Designing Places also sets out the benefits – social, cultural and economic – of good design, and sets out some of the tools needed to achieve it. However, it provides very limited practical guidance on exactly what good design is and how it can be assessed. The criteria and sub-criteria in SG LSD2 build on Designing Places by providing a suite of practical design questions which tease out a development’s response to various issues – both functional and aesthetic. These are backed up with planning advice and a technical advice note which explore each of the criteria in greater detail and provides examples of suitable responses to them. The criteria specifically address issues raised in Designing Places – such as creating safe and welcoming places that have a sense of place and local identity. However, minor amendments may be required to make these issues more explicit in SG LSD2 – particularly in relation to the creation of welcoming environments. Generally, however, SG LSD2 is an appropriate response to Designing Places.
- 3.2 Designing Streets moves the emphasis of street design away from engineering standards and vehicular movement towards place and the needs of pedestrians and cyclists. It fleshes out the content of Designing Places insofar as it relates to street design, highlighting the importance of well designed streets to the creation of successful places. As it is a statement of policy, Designing Streets can also be used as a material consideration in the determination of planning applications. Whilst SG LSD2 does not provide any detailed street design guidance (this is addressed in Aberdeenshire Council’s Roads Standards which are being reviewed in light of Designing Streets), associated planning advice takes due regard of the approach set out in Designing Streets and recognises it as a guiding document in terms of street design. LSD2 also supports the “qualities of place” to which both Designing Places and Designing Streets subscribe. The approach in SG LSD2 therefore accords with Designing Streets.
- 3.3 The following Planning Advice Notes support the policy approach expressed in Designing Streets and Designing Places:
- PAN 77: Designing Safer Places;
 - PAN 78: Inclusive Design;
 - PAN 83: Masterplanning;
 - PAN 67: Housing Quality

These documents examine design in greater detail than can be addressed fully in this policy, however all subscribe to Designing Places' qualities of place which are fully addressed by SG LSD2.

Strategic/Regional Context

3.4 The Aberdeen City and Shire Structure Plan 2009 ("the Structure Plan") and the Proposed Aberdeen City and Shire Strategic Development Plan ("the SDP") identify high quality design as being integral to the creation of sustainable mixed communities; tackling climate change, and; maintaining and improving our environment. To help tackle climate change, both plans state that new developments should be "designed and built to use resources more efficiently and be located in places where they have the least effect on the environment as possible." The SDP further emphasises the importance of improving energy efficiency by stating that:

"focusing initially on using energy-efficiency measures is likely to be the best way of reducing the demand for energy as a step towards achieving carbon-neutral development, and this should be done as soon as practically possible."

The SDP goes on to highlight the importance of increasing the supply of energy from renewable resources, taking adaptation measures against the impacts of flooding, improving waste management measures and improving water efficiency. The importance of these issues is backed up by the following targets:

- "For all new buildings to be carbon neutral by 2020
- For the city region's electricity region's electricity needs to be met from renewable sources by 2020
- For all new developments to use water-saving technology
- To avoid developments on land which is at an unacceptable risk from coastal or river flooding (as defined by the 'Indicative River and Coastal Flood Map for Scotland' or through a detailed flood risk assessment), except in exceptional circumstances.
- To work towards an extra 300,000 tonnes of new waste management infrastructure"

SG LSD2 provides a focus on some of these issues by requiring developers to consider embodied energy and end-of-life recycling; energy and water efficiency measures; and the installation of micro-renewables. However, as noted in section 2 it fails to set specific requirements for the application of any of these measures. This is remedied, in part, by 'SG LSD11: Carbon neutrality in new development' which requires developments to "achieve at least a Bronze Active rating under Section 7 of the Building Standards Technical Handbook." However this supplementary guidance does not address water efficiency measures, and the LDP also lacks a policy on adaptation to flooding. It may therefore be appropriate for a new policy, with associated supplementary guidance, to be produced to address these issues and provide a greater focus on sustainability. Any new policies and/or supplementary guidance produced on these issues should be referred to in SG LSD2's reasoned justification. The reasoned justification should also make reference to SG LSD11 to further highlight the importance of carbon reduction in new developments.

3.5 Historically in Aberdeenshire there has also been a significant focus amongst developers on the provision of "executive" housing which does little to contribute to sustainable mixed communities. This is acknowledged in both the SDP and

Structure Plan which state that “too often in the past, new development has not been sustainable, mixed or focused on meeting the needs of the community.” Both plans go on to state that:

“our future communities must be mixed in terms of the type and size of homes, as well as their tenure and cost...If we want to allow people to have a choice of where they want to live, developments must provide a wide range of options, from starter homes to large detached houses”

Whilst SG LSD2 addresses the balance of developments and the need for a mixture of house types, additional clarity on housing mix is needed if developments are to provide a range and mix of housing which will contribute to the creation of sustainable mixed communities. Minor modifications to the main supplementary guidance text and the reasoned justification are required to remedy this.

4. Drivers of change

- 4.1 Whilst this paper has not established the need for significant changes to SG LSD2, it supports the potential need for a new policy and/or supplementary guidance to be published focusing on making new development more sustainable. This will be required if new development is to meet the aspirations of the SDP, particularly in relation to water-efficiency and adaptation to flooding.
- 4.2 Minor modifications to SG LSD2 are required to provide a more robust approach to the provision of a mix of housing, provide greater clarity and reduce the use of “woolly” terms which have little currency and are not defined in associated planning advice.

5. Recommendations

- Criterion 1 should be deleted. The following text should be added as criterion 4 to SG LSD1:
“if a masterplan, development framework, development brief, design brief, design statement or design code has been produced for the development site, the development accords with it”
- The term “homeliness” should be deleted from part i of criterion 2c.
- Part iv of criterion 2d should be replaced with:
“visual appeal (the creation of a welcoming environment, style etc)”
- Part i of criterion 2d should be replaced with the following:
“the balance of the development (mixture of house types, sizes and tenures, and other building types and land-uses where relevant); and”
- Further re-wording is required to ensure that the policy is clear and easily understandable.
- A criterion should be added requiring developments to provide biodiversity enhancements as part of their development.
- Part ii of criterion 2c should be replaced with:
“support systems (sustainability of approach to drainage, heating and electricity, including the use of renewable technologies and/or heat networks)”

- Text should be added to the reasoned justification clarifying that not all criteria are relevant to every type/scale of development. Reference should also be made to relevant planning advice/technical advice note.

6. Summary of main points

- 6.1 LSD2's approach to layout, siting and design generally accords with both strategic and national policy. However, this review has highlighted the need for a stronger policy approach to sustainable development, potentially backed up by a new policy and supplementary guidance focussing on this issue. The new supplementary guidance could address water efficiency and adaptation to flooding. This issue should be the subject of discussion in the forthcoming Main Issues Report.
- 6.2 The following minor modifications to SG LSD2 are also proposed:
- Criterion 1 should be replaced with the following:
 - "if a masterplan, development framework, development brief, design brief, design statement or design code has been produced for the development site, the development accords with it"
 - The term "homeliness" should be deleted from part i of criterion 2c.
 - Part iv of criterion 2d should be replaced with:
"visual appeal (the creation of a welcoming environment, style etc)"
 - Part i of criterion 2d should be replaced with the following:
"the balance of the development (mixture of house types, sizes and tenures, and other building types and land-uses); and"
 - Further re-wording is required to ensure that the policy is clear and easily understandable.
 - A criterion should be added requiring developments to provide biodiversity enhancements as part of their development.
 - Part ii of criterion 2c should be replaced with:
"support systems (sustainability of approach to drainage, heating and electricity, including the use of renewable technologies and/or heat networks)"
 - Text should be added to the reasoned justification clarifying that not all criteria are relevant to every type/scale of development. Reference should also be made to relevant planning advice/technical advice note.

References

Aberdeen City and Shire Strategic Development Planning Authority (2009) *Aberdeen City and Shire Structure Plan*

Aberdeen City and Shire Strategic Development Planning Authority (2012) *Proposed Aberdeen City and Shire Strategic Development Plan*

Aberdeenshire Council (2012) *Aberdeenshire Local Development Plan 2012*

Scottish Government (2001) *Designing Places*

Scottish Government (2010) *Designing Streets*

Scottish Government (2010) *Scottish Planning Policy*