

# Friends of the Earth Scotland response to the Aberdeenshire Local Development Plan Main Issues Report Consultation



**Friends of  
the Earth  
Scotland**

31<sup>st</sup> January 2014

## Introduction

Friends of the Earth Scotland is an independent Scottish charity with a network of thousands of supporters, and active local groups across Scotland. We are part of Friends of the Earth International, the largest grassroots environmental network in the world, uniting over 2 million supporters, 76 national member groups, and some 5,000 local activist groups.

FoE Scotland was actively involved in helping create the Climate Change (Scotland) Act 2009 and continues to press the Scottish Government to deliver on the commitments therein, as well as working on urban air pollution, community renewables and the role of communities in environmental decision making.

Friends of the Earth Scotland is happy for our response to be made public and would be pleased to receive email updates on the issues raised here.

## Question 1

**Do you have any comments you would like to make on the policies that we suggest leaving largely unchanged in the next Local Development Plan?**

No view

## Question 2

**Is it appropriate to have a high level policy on climate change and group together policies on this subject ?**

It is vital to have a high level policy on climate change, indeed it would be hard to see that the Council was taking seriously its duties under the Climate Change (Scotland) Act 2009 if this were not present. The new Policy 15 is to be supported but the word 'assist' and the qualification about compatibility with other policies suggests a rather passive approach when what is needed is leadership from the Council. We suggest a better policy would talk about the Council 'leading the efforts to reduce the causes and the adapt to the impacts of climate change' or at least 'work with partners to reduce the causes and the adapt to the impacts of climate change.'

We welcome the mention of higher standards for new buildings. However, a commitment to increased enforcement of building regulations in new buildings is needed to ensure that the theoretical higher standards are really being delivered in practice.

The vast majority of energy use in buildings will continue to be in existing buildings and a clear statement of the Council's role in improving energy efficiency standards in these buildings is necessary.

Other policies on renewable energy and transport are weak and undermine the commitment to deliver Aberdeenshire's fair share to reducing Scotland's emissions.

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### **Question 3**

**Is it appropriate to have the creation of green networks as one of the principle aims of the plan?**

Yes, this aim is welcome. Green space is important to the wellbeing of our communities and green networks could provide safe walking and cycling routes, encouraging people to use active forms of travel for shorter journeys. Long distance cycle routes through green spaces are required too as many more people would cycle more if safe routes were provided.

### **Question 4**

**Would requiring office developments to locate in town centres unless they can demonstrate that there are no town centre sites available make a worthwhile contribution to the vibrancy of town centres?**

This is a sensible policy but requires some safeguards. It could very significantly reduce traffic, congestion and emissions, if combined with the right policies on parking, cycling, walking and public transport. However, caution should be exercised that office space does not displace town-centre residential accommodation.

### **Question 5**

**Are the changes being suggested for the Housing in the Countryside Policy appropriate or should an alternative approach be adopted ?**

No view

### **Question 6**

**Does the spatial framework for wind turbines accurately reflect the level of constraint found across Aberdeenshire and does the amended local development plan policy provide an appropriate context for making decisions on wind turbine applications**

The proposed approach is overly restrictive and will hamper or even deter applications for perfectly acceptable windfarms. The policy in its current form will guarantee that wind development in Aberdeenshire will not reach its appropriate potential and that the area will not make its fair share to reducing Scotland's climate change emissions.

The 2.5km separation distance from all settlements is in excess of the national guidelines for Areas of Search for wind farms of over 20MW and is inappropriate. The national guidelines should be followed. Any distance for separation should also be restricted to settlements identified in the local development plan in line with draft SPP 2013.

Instead of identifying areas where wind farms should not be allowed, a more logical approach would be to identify areas with high wind speeds where they would be permitted.

We are enthusiastic about community renewables and we would encourage a planning framework which gives priority to schemes which are brought forward by communities or which have a high level of community benefit.

### **Question 7**

**Are new policies required to consider new and emerging renewable generating technologies.**

Yes in order to ensure that developments fit the needs of Aberdeenshire's communities in the future, it makes sense to ensure relevant policies are in place to guide the development of these technologies. All forms of renewable energy should be supported. And even if District Heating Schemes are fuelled by gas, these should be looked on favourably as this will provide a basic infrastructure that could be transferred to renewable heating forms later.

**Question 8**

**Is it appropriate to deliver housing for people on modest incomes through reference to the range of house sizes and tenures within developments, or is an approach more closely tied to the national affordable housing benchmark required.?**

No comment

**Question 9**

**Is it appropriate to decrease risk of future flooding by applying a higher standard now?**

Yes, this is an essential precautionary approach, the local authority has an essential role in heading off future problems caused by inappropriate siting of development.

**Question 10**

**Are the requirements for sustainability labels and appropriate way of achieving carbon neutral buildings by 2020? Are the standards for the installation of Low and Zero Carbon Generating Technologies appropriate.**

Yes the requirement to use the Sustainability Labelling should have a significant impact. A previous but now lapsed Scottish Government commitment was for all new homes to be Zero Carbon by 2016, so Aberdeenshire Council could show leadership by bringing forward the requirement for the more stringent criteria of the Platinum Sustainability Label to this date.

**Question 11**

**Area there any Local Nature Conservation sites that should be added or removed from figure 5, and why?**

No comment

**Question 12**

**Should the policy on locally valued views be removed and ultimately replace by a set of Local Landscape designations or reviewed?**

No comment