

Response ID ANON-WYN9-4S3A-J

Submitted to **Local Development Plan - Pre-Main Issues Report Questionnaire**

Submitted on **2018-05-28 12:27:02**

Introduction

1 Please let us know the capacity in which you are completing this questionnaire. Are you...

A developer/their agent

If you are a community representative, which area do you represent?:

If you answered Other, please tell us who you are.:

2 Please provide your name and contact details?

Name and Organisation::

Savills

Address::

[REDACTED]
[REDACTED]

Postcode::

[REDACTED]

Telephone::

[REDACTED]

[REDACTED]

[REDACTED]

3 If you are acting as an agent or completing this on behalf of an organisation, group or landowner, please provide their details:

Organisation/Group/Landowner:

Elgin Energy

Address::

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email::

4 May we have your permission to publish your name and/or organisation alongside your comments?

Yes

Aberdeen's Main Planning Issues

1 What do you think are the most important things that make Aberdeen a good place to live, visit and/or work?

The most important things that make Aberdeen a good place to live, visit and/or work?:

2 What do you think should be the Council's top priorities for the next Aberdeen Local Development Plan?

What should be the Council's top priorities for the next Local Development Plan?:

3 Do you have any particular aspirations for your community or Aberdeen as a whole that you think should be taken forward through the Aberdeen Local Development Plan? For example, what are your views on recycling of waste, affordable housing, access to green space or ways to reduce CO2 emissions?

Do you have any particular aspirations for your community or Aberdeen as a whole that you think should be taken forward through the Aberdeen Local Development Plan:

Policy Topic Areas

1 What do you think should be our main planning priorities for the City Centre? (For example, what should the role of Union Street be? Does the City Centre have all the uses we want, or should there be more uses there - and if so where could they go?)

What do you think should be our main planning priorities for the City Centre?:

2 What do you think should be our main planning priorities for providing infrastructure? (For example, how should new infrastructure be provided and how might it be paid for?)

What do you think should be our main planning priorities for providing infrastructure? :

3 What do you think should be our main planning priorities for transport and accessibility? (For example, how can we make it easier to travel in and around Aberdeen? Should we look at pedestrianisation in the City Centre?)

What do you think should be our main planning priorities for transport and accessibility?:

4 What do you think should be our main planning priorities for ensuring we have high quality buildings and places? (For example, how can we better protect our built heritage and ensure high quality and sympathetic architecture and landscape design?)

What do you think should be our main planning priorities for ensuring we have high quality buildings and places?:

5 What do you think should be our main planning priorities for meeting the needs of business and industry? (For example, what can be done to retain existing businesses and attract new employment opportunities to Aberdeen?)

What do you think should be our main planning priorities for meeting the needs of business and industry? :

6 What do you think should be our main planning priorities for meeting Aberdeen's housing and community needs? (For example, how can we meet the needs of people who cannot afford mainstream housing?)

What do you think should be our main planning priorities for meeting Aberdeen's housing and community needs?:

7 What do you think should be our main planning priorities for supporting retail centres across Aberdeen? (For example, should we be safeguarding existing centres, and what are your thoughts on new out-of-town retail parks?)

What do you think should be our main planning priorities for supporting retail centres across Aberdeen?:

8 What do you think should be our main planning priorities for protecting and enhancing the natural environment and preventing flooding? (For example, what areas or features should we be safeguarding?)

What do you think should be our main planning priorities for protecting and enhancing the natural environment and preventing flooding?:

9 What do you think should be our main planning priorities for ensuring that resources and waste are managed sustainably? (For example, can we make more innovative use of waste as a resource? Should we encourage renewable energy use? How could we do these things?)

What do you think should be our main planning priorities for ensuring that resources and waste are managed sustainably? :

10 If you have any views on topics not covered above, please write them below.

If you have any views on topics not covered above, please write them below:

REPRESENTATION TO ABERDEEN CITY COUNCIL LDP CALL FOR SITES (RENEWABLE ENERGY IN THE GREEN BELT)

Introduction

It is considered that there are opportunities within the Green Belt where appropriate forms of renewable energy especially large-scale Ground Mounted Solar PV can be developed now and in the future. Such development would accord with the objectives of the green belt, and help accelerate improvements to biodiversity therein. As presently drafted, there is no explicit policy support for such development, even when it can be demonstrated that this would support the objectives of the Green Belt in all other regards.

The policy should therefore be capable of offering clarity on appropriate locational criteria for a range of renewable energy particularly large scale ground mounted solar PV given its potential for positive impacts.

National Policy

The National Planning Framework 3 acknowledges the fact that rural and semi-rural as well as urban areas, have a part to play in allowing for positive development within Scotland. Paragraph 4.7 of the NPF3 states that 'We have long sought to protect Scotland's environment, recognising that it is a dynamic

resource rather than a fixed asset. To better reflect this, more proactive and innovative environmental stewardship is required.'

Paragraph 49 of Scottish Planning Policy (2014), states that the purpose of green belts may be (among other things) to protect and enhance the character, landscape setting and identity of a settlement, or to protect access to open space.

Paragraph 52 of the same document further states that Local Development Plans should describe the types and scales of development which would be appropriate within a green belt. It then sets out a list of examples for this. While Renewable Energy and large-scale Solar PV Development in particular are not referenced within this list, the tone of paragraph 52 indicates that the options that follow are not exhaustive. It is noteworthy in this context that 'development meeting a national requirement or established need' does however feature within the list.

Such high-level commentary is important with regard to renewable energy proposals and ground mounted Solar PV development in particular. As research and technology advances, the physical form of renewable energy developments is in a state of ongoing evolution, and this means that land in and around Aberdeen may now and in the future be appropriate for technologies that could have been commercially unviable only a few years ago.

Given the need for suitable grid access and suitably large areas of land to develop on, there are considered to be sound planning and commercial reasons to look at the Aberdeen's Green Belt as an appropriate location for large scale ground mounted Solar PV. Such development is able to marry the innovative environmental stewardship promoted by NPF3, along with affording the protection and enhancement to the City as required by SPP.

Current Aberdeen City Council Policy

In framing a Vision for the City of Aberdeen, the Adopted Aberdeen City Local Development Plan 2017 echoes the Vision set out in the Aberdeen City and Shire Strategic Development Plan. Where relevant to our clients' interested this is articulated as follows:

"We will have acted confidently and taken the courageous decisions necessary to further develop a robust and resilient economy, and to lead the way towards development being sustainable, including dealing with climate change..."

Further, 'tackling climate change' is identified as one of the 6 main aims of the Strategic Development Plan.

The Adopted LDP also offers some commentary on the Energetica corridor, and reflects on how this 30 mile tranche of land to the north of the city is expected to help cement the wider region as a global all-energy hub. It is significant that the expectation in the LDP for this corridor is that:

"All new development within the Energetica area is expected to make a contribution to its quality of life, environmental performance and economic development"

Against this high-level backdrop, Policy NE2 of the current Adopted Aberdeen City Local Development Plan addresses Green Belt. The narrative supporting the policy describes its aim as being to 'maintain the distinct identity of Aberdeen and the communities within and around the city, by defining their physical boundaries clearly'. The policy clearly has the prevention of coalescence and sprawling development of the City at the heart of its purpose.

The policy sets out developments that are acknowledged as being acceptable in the green belt and also contains a list of 'exceptions' where other forms of development will be supported subject to them meeting stringent qualifying criteria. Renewable Energy and large-scale Ground Mounted Solar PV are in neither list and accordingly do not currently have the benefit of policy support.

It is noticeable however that under exception criterion 2, Essential Infrastructure is included. In Perth and Kinross Council's recent Proposed Local Development Plan, Renewable Energy has been included as a justifiable development type within its 'Essential Infrastructure' criterion.

Given all of the foregoing, and in particular the need both for local confidence in dealing with climate change and the establishment of the Energetica corridor, we would consider that the same reasoning should be applied to Aberdeen's Green Belt in respect of these types of Development.

The following paragraphs seek to further outline why we consider this to be the case.

Positive Attributes

Solar PV has much potential for good in urban fringe areas by virtue of enhancing biodiversity, improving soil quality and allowing farming activities to continue in these areas. Non-permanent renewable energy development can be designed in such a way that biodiversity will be enhanced, and the landscape impact is minimal or can be mitigated. This can be done to ensure accordance with the overriding objectives of the green belt. Accordingly, it is considered that a further criterion should be included to augment the existing Green Belt policy to reflect the technology's capacity for positive rural renewal.

In the case of ground-mounted solar PV developments in particular, the plant and supporting apparatus is low lying and any visual impact these structures have beyond their site boundaries can usually be adequately mitigated. Typically the highest point of any ground-mounted solar panel is no greater than 2.8 metres from ground level. With well-sited installations at this scale, the character, landscape setting and identity of the land surrounding Aberdeen could be protected even while it plays host to renewable technology.

As these developments are both temporary and fully removable, they will not leave any brownfield legacy on temporary sites within the Green Belt. By contrast, well-sited Solar PV developments provide opportunities to enhance such defensible assets as character, landscape setting and identity by encouraging continued countryside access and allowing for greater biodiversity within and between sites. Through careful landscape management, habitat can become established during the period when the development quietly generates low-impact renewable energy. Once removed, such enhanced habitat will make a positive contribution to the green belt, and the location of any such evolving habitat can be taken into account when long-term planning of the wider green network is undertaken.

Enhancement of local wildlife and improvements to biodiversity can be designed into such projects through the introduction of wide ecological corridors, bird boxes and bug hotels, and through the retention of field boundaries such as hedgerows. Furthermore, grass and wildflower mix can be introduced between the

rows of panels to encourage further biodiversity enhancements, while such land can continue to stay in agricultural use throughout the period the modules are installed, in the form of animal grazing beneath the modules.

Conclusion

Solar PV sites should be recognised for their potential to enhance biodiversity and improve the character and identity of land within the Green Belt. Appropriate locations can be identified and planned for through careful site selection and landscaping. In addition, the low-lying nature of ground-mounted solar PV means that it can be integrated into the landscape without adverse impact.

11 If you have any further information you would like to upload please do so below

File upload:

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12 If you wish to be added to the LDP emailing list be be kept informed of the progress of the local development plan, please provide your email address:

Newsletter list :