

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 31 July 2020*.

We recommend that you keep a copy of your representation for your own records.

**UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*



ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.



Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in a **separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 31 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: ldp@aberdeenshire.gov.uk

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

YOUR DETAILS

Title:	Director of Development
First Name:	George
Surname:	Baxter
Date:	31/07/2020
Postal Address:	[REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

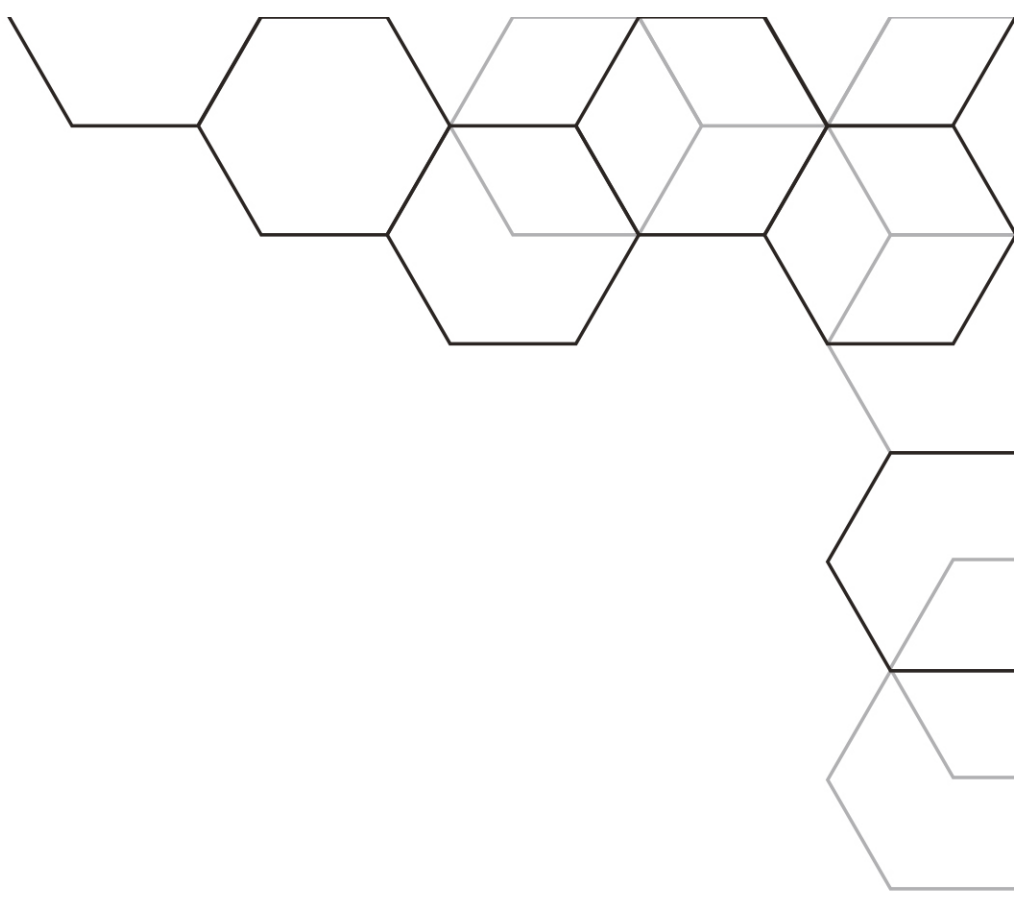
Are you happy to receive future correspondence only by email? Yes No

Are you responding on behalf of another person? Yes No

If yes who are you representing?

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

An acknowledgement will be sent to this address soon after the close of consultation.



YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

GreenPower recommends that the Aberdeenshire Proposed LDP is amended to reflect national Climate Change policy and the likely policy position of the emerging NPF4. This presents an opportunity for Aberdeenshire Council to align itself with targets on climate change and emissions and provide a sound basis for sustainable development and economic recovery post Covid-19. The Landscape Capacity Study is fundamentally flawed and significantly out of date and out of tune with public opinion which is strongly supportive of onshore wind development. It would be helpful if the LDP made it clear that the LCS will not be relied upon to determine acceptability of specific project proposals. There are many inconsistencies in the LDP and it does not appear to GreenPower to be fit for purpose in its current state and should be significantly amended.

Therefore GreenPower formally objects to the LDP and would encourage Aberdeenshire Council to be much more positive and flexible in its approach to enable renewable energy development in the region in order to support the national effort to tackle climate change and to realise the benefits for the people and economy of Aberdeenshire from renewable energy development.

Reason for change:

The Foreword of the proposed plan offers encouragement for developers proposing renewable energy solutions for a low-carbon future, when it states at Section 2 that *"New development will be sustainable. What we do and how we live today should not leave our children unable to achieve a similar quality of life in the future and should take into account the important issues of climate change and reducing carbon use."*

However, whilst such encouragement is laudable, the draft LDP makes no reference to the nationally declared climate emergency, nor the Scottish Government commitment to reducing the effects of climate change through a 75% cut in emissions by 2030, and net-zero greenhouse gas emissions by 2045, that requires a shift to a more supportive approach of the renewable energy technologies needed to meet the energy and climate change targets. Much has changed since the current LDP was adopted, such as the need to tackle the climate emergency, and GreenPower would like to see the proposed LDP take a much more positive approach to enable renewable energy development in meeting these targets and to the benefits that will result both for Aberdeenshire and for delivering national policy.

It is the opinion of GreenPower that the Proposed LDP should be amended to reflect the Scottish Government's climate change commitments and support for the further development of renewable energy developments, particularly at the scale required to meet our energy and climate change targets.

C2 Renewable Energy

The introduction to Section 13 describes climate change as 'possibly the greatest challenge facing the world today', and we welcome the statement at Policy 2.1 that Aberdeenshire Council will support renewable energy developments.

It is therefore highly relevant that the Proposed LDP align itself with the technologies best suited to delivering low-carbon energy, with Onshore Wind being the cheapest form of low carbon electricity generation available to the UK, as outlined in the 2018 BVG Associates report '[The Power of Onshore Wind](#)'.

Policy C2.2 Wind Energy

GreenPower is encouraged that Aberdeenshire Council *"will approve wind energy developments in appropriate locations"*, however it is not at all clear how this will be assessed or which criteria should apply. It would be greatly preferred if policy C2.2 were amended to reflect the criteria defined in SPP.

GreenPower has substantial concerns as to the reference to the 2014 Strategic Landscape Capacity Assessment for Wind Energy. The Capacity Study – published in March 2014 – came into effect prior to the latest SPP and the subsequent declaration of the climate emergency and net-zero target for carbon emissions.

The Executive Summary of the 2014 Capacity Study states that 'the assessment has determined that there are no areas of Aberdeenshire suitable for extensive windfarms with large turbines'. This document cannot provide a suitably positive or flexible framework to assess future applications, if it has already determined there is no scope for large turbines. In any case, the use of the landscape capacity study to effectively produce another layer of SPP Group 1 'no-go' areas for turbine development is questionably at odds with SPP 2014. The resulting 'preferred areas' for onshore wind development are also questionable, for example in one of the preferred areas south of Keith the area has already had numerous applications for wind energy projects refused. The Proposed LDP also recommends that *'existing bases should be reused'* however, this does not take into account that modern commercial-scale turbines also typically require greater spacing, and so repowering like for like on a site is highly improbable, even if the bases were able to be re-used with warranties and engineering requirements met.

Privacy Notice

LOCAL DEVELOPMENT PLAN

PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.

