

## Appendix 3

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| <b>Appendix 3</b>   | <b>Energetica Placemaking</b>  |  |
| <b>Development plan reference:</b>  | <b>Planning Advice</b>   |  |
| <b>Body or person(s) submitting a representation raising the issue (including reference number):</b>  |  |  |
| <p>2 –Transportation, Infrastructure Services, Aberdeenshire Council<br/>           3 – Knight Frank on behalf of various landowners and developers<br/>           4 – Scottish Natural Heritage (SNH)<br/>           5 – Scottish Environment Protection Agency (SEPA)<br/>           6 – SITA UK<br/>           8 – Planning Modernisation Group Executive (PMGE)<br/>           9 – Halliday Fraser Munro on behalf of ANM Group Ltd<br/>           10 – Halliday Fraser Munro on behalf of Harper &amp; Cochrane Ltd<br/>           11 – Baxter Design<br/>           13 – Enterprise Planning and Infrastructure, Aberdeen City Council<br/>           14 – Royal Society of the Protect of Birds (RSPB)<br/>           15 – Transportation Strategy and Programmes, Aberdeen City Council<br/>           16 – Stewart Milne Homes<br/>           17 – Environmental Policy, Aberdeen City Council.<br/>           20 – Colin Tawse<br/>           21 – Kirkwood Homes<br/>           22 – [Bridge of Don] Community Council<br/>           23 – Walking-the-Talk<br/>           24 – Ryden<br/>           25 – Homes for Scotland<br/>           26 – Ellon Business Initiatives</p>  |  |  |
| <b>Provision of the development plan to which the issue relates:</b>  | <p>Aberdeen City Local Development Plan - Directions for Growth – Bridge of Don/Grandhome, and Directions for Growth – Dyce, Bucksburn and Woodside.</p> <p>Aberdeenshire Local Development Plan Policy 1: Business Development and Supplementary Guidance LSD2: Layout, siting and design of new development.</p> |  |
| <b>Summary of the representation(s):</b>  |  |  |
| <p><b>Question 6: Do you find the planning advice document, usable, understandable, helpful and clear?</b></p> <p><b>14, 17 &amp; 22:</b> Believe the document is usable, understandable, helpful and clear.</p> <p><b>3, 6, 9, 10, &amp; 11:</b> Believe the document is not usable, understandable, helpful and clear.</p> <p><b>3 &amp; 6:</b> Express concern that it is just another layer of policy that will impose further requirements beyond the LDP and will result in an extra cost burden for employment developments such that they will be discouraged from developing within the corridor, thus being in conflict with the Structure Plan designation of a Strategic Growth Area.</p> <p><b>6:</b> Suggests the advice should relate more clearly to the six criteria in the Supplementary Guidance and to different types of development defining what exactly each requirement is looking to achieve and give explanations.</p> <p><b>6:</b> Guidance focuses on residential and town development; suggests this should be balanced with consideration of industrial and rural development.</p> <p><b>9 &amp; 10:</b> Question whether the Energetica aspirations will be deliverable by the LDP allocations. Instead they feel that the aspirations will only be deliverable in the confines of the LDP.</p> |  |  |

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**11:** Suggests more visual examples of what is expected are needed.

**Question 7: Do you think that the planning advice helps to meet the six criteria in the supplementary guidance?**

**9, 10, 11, 14 & 22:** Believe the document helps to meet the six criteria, but feel that the aspirations are outwith the scope of the planning system (**9&10**) and the criteria are not comprehensive enough (**14**).

**9 & 10:** Suggests there is need for more than a Supplementary Guidance; a strong backing from agencies such as Scottish Enterprise and ACSEF is also needed.

**6:** Believes the document does not help to meet the six criteria.

**Question 8: Rate the Energetica Placemaking documents.**

### Layout of documents

**9, 10, 11 & 22** Rate the documents as being good.

**6:** Rates the layout as not helpful and there are no linkages between the three documents.

**4:** There is a lot of inspiring information within the document but its structure makes the information difficult to access. Furthermore, it is not clear how this information will be used in practice. It is also unclear how the three introductory sections in the Planning Advice relate to the rest of the document and how they relate to the six criteria in the guidance.

### Diagrams

**9, 10 & 22:** Rate the documents as being good.

**11:** Rate the document as being average for its diagrams.

### Size of text

**11 & 22:** Rate the documents as being good.

**9 & 10:** Rate the documents as being average for the size of text.

### Images

**9, 10 & 22:** Rate the documents as being good.

**11:** Rate the document as being average for its images.

**26:** Expresses concern that many of the images used in the documents give an over simple illustration of the effect and as a result they tend to be misleading. For example on density, it implies that development should be starting from suburbia and creating more suburbia (e.g. chapter 01.3 Green Settlement Pattern).

### Length of advice

**8:** Notes that considerable efforts have been made in the production of the documents but the combination of additional documents makes for additional effort for stakeholders. Suggests the amalgamation of the documents to simplify the requirements for development.

**11 & 22:** Rate the documents as being good.

**9 & 10:** Rate the documents as being poor for its length and **21** regards the length as too long.

**24:** Suggests the process needs to be simplified and speeded up. Consideration should be given to preparing a short, concise, consolidated document setting out all the planning policies applicable to the Energetica Corridor.

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### Language

**6, 9, 10, 11 & 22:** The language is good but confusing when condensing the six criteria (6).

#### **Question 9: Would you consider signing up to an ‘Energetica Charter’?<sup>1</sup>**

**3, 6, 9, 10 & 11** Would sign up to the charter on the basis that discussions would be carried out with council representatives (11) if it is seen as a positive thing within the development industry (3) and if it was committed to the principles of sustainability (6).

**16 & 22** Would not sign up to the charter.

**20:** Uncertain as there no incentive for investment; would mean significant additional costs; there is no clear benefit arising from additional cost; and potential for substantial delay and grief.

#### **Question 10: Other comments relating to the planning advice**

### Welcome/support

**13:** Is happy with main thrust of document.

**23:** Overall the documents are positive and integrative.

**26:** Supports some of the aspects of the guidance particularly those that concern the creation of interesting places and streets and the encouragement of mixing residential and work addresses.

### 1.0 Enhancing Quality of life - Landscape and green space

**4:** Fully supports multiple benefits from land use, but recommend including text on limiting potential adverse impacts on biodiversity and landscape associated with some energy crops.

**4:** Clarification is needed on the following statement “using the landscape as a resource for settlements including providing construction materials, fuel and food and other, low energy options.” Concerned that it is ambiguous and open to interpretation, such as the encouragement of quarrying. However, acknowledges that it could be to encourage working in the local environment to realise resource-efficient buildings and places.

**5:** Welcomes the clear reference that is given to green spaces fulfilling multifunctional roles (e.g. for flood management and surface water attenuation purposes).

**14:** Lacks effective consideration of biodiversity conservation and enhancement. Should include a proper, overarching strategy for the conservation and enhancement of natural features, habitats and biodiversity, which is linked to the national and local Biodiversity Actions Plans.

**17:** Suggests the advice needs to go a step further and include the need to maintain existing as well as creating new green networks.

**15:** Reference to corridor wide networks of footpaths should be amended to foot and cycle paths.

### 1.0 Enhancing Quality of life - Movement networks

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<sup>1</sup> This question is primarily aimed towards developers/applicants. One idea is that the Charter could be a commitment from developers to meet the aims and aspirations of Energetica Placemaking and as a result get to use the Energetica branding (if you have other ideas on what the charter could involve and what would encourage you to sign up to a Charter please add it the comments box).

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**2, 13 & 15:** Gravel surfaces on roads are unacceptable and will not be permitted.

**15:** Suggests reference made to Designing Streets should also recognise council standards.

**15:** Suggests this section also needs to recognise the importance of Local and Regional Transport Strategies as well as the Core Paths Plan.

**15:** On page 8, suggests walkable neighbourhoods should be walkable/cycleable neighbourhoods as all facilities should be in walking/cycling distance.

**15:** Reference to corridor wide networks of footpaths should be amended to foot and cycle paths.

**15:** Suggests the bullet points should be prioritised by pedestrians, cyclists and public transport hierarchy.

### 1.0 Enhancing Quality of life - Density Patterns

**4:** Recommends the approach on how to achieve high density settlements is clearly explained, noting that careful design and planning is required to achieve high densities while retaining sufficient easily accessible and high quality greenspace, including public and private gardens.

**5:** Suggests an additional bullet point in this section on the importance of incorporating Sustainable Drainage in new developments.

### 1.0 Enhancing Quality of life - Integrating Industrial Environments

**5:** Suggests consideration should be given at an early stage to the opportunity for recovering surplus heat and power for use in nearby developments. Notes there is opportunity for energy recovery from certain types of developments including some types of waste management facilities. Suggests clearer linkages need to be made between this and development layout.

**13:** Expresses concern that some of the technical requirements within Designing Streets will be inappropriate for busy industrial roads.

### 1.0 Enhancing Quality of life - Heritage and Reuse of Assets

**17:** Designated nature conservation sites such as SSSIs and LNCS need to be mentioned and that these sites should be respected and protected.

**17:** Suggests designs should include new habitats/homes for species that use old buildings/structures for roosting/nesting.

**17:** Suggests reference could be made to Supplementary Guidance on Natural Heritage in the Proposed LDP.

**17:** Need to elaborate on the planting of native species in "traditional patterns", explaining what this means.

### 2.0 Environmental Performance - Approach

**4:** Is unclear what is meant by the target "ecological impact reduction target" and how this target will be assessed. Notes that the main sections (pg 41-54) include carbon and ecological impact targets, but queries who will be responsible for measuring these and how and what will be done if these targets are not met? Suggests rather than just reducing impacts, it may be an idea for developments to make a positive contribution to ecological interest and enjoyment.

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### 2.0 Environmental Performance - Energy

**5:** Support the reference made to alternative types of energy solutions however reference to the use of surplus heat and power recovery should be made.

**6:** Notes that the use of heat from Combined Heat and Power generation would help achieve the two strategic targets set out in Energetica (reducing carbon emission and ecological impacts). Also notes that one of the major barriers to heat use is the cost of retrofitting the enabling pipe work. Therefore, requests that the documents requires pipe work to be incorporated within key infrastructure developments such as roads, and industrial estates, residential and business developments to allow for connection at a later date as heat becomes available in the future.

### 2.0 Environmental Performance - Sustainable Transport

**13:** Notes there is a limit to the extent to which road infrastructure can be limited. For instance, emergency accesses still need to be maintained as do disabled accesses.

**13:** Highlights that excessive reduction in car parking can lead to improper parking elsewhere which can cause issues for residents.

**15:** Suggests the introductory paragraph needs to be expanded upon and begin with encouraging and promoting active and sustainable travel before moving onto reducing reliance on private car travel.

**15:** Suggests reference needs to be made to households needing to be within 400m of a bus stop with frequent services.

**15:** Suggests Green travel plan needs to detail mode share targets and how these will be achieved, and not just mention carbon intensive travel to and from the site.

**15 & 23:** The integration of “regional walking and cycling routes” implies that this infrastructure exists and is adequately resourced. Suggests it would be helpful to include mention of contributing to the development of additional local and regional walking and cycling routes, where gaps are identified.

**23:** Expresses concern there is no mention of developing or encouraging networks of paths between settlements to encourage sustainable transport. Expresses concern that the advice does not address the supporting infrastructure requirements (such as paths) for the area and does not make linkages between settlements and the wider countryside from a recreational or sustainable transport perspective.

### 2.0 Environmental Performance - Recycling and waste strategy

**5:** Supports efforts for recycling and waste reduction but reference needs to be made here to the reuse of surplus heat and power from certain types of waste management facilities.

### 2.0 Environmental Performance - Water

**5:** Supports the promotion of SUDS but would highlight that they are now a legal requirement under the Water Environment (Controlled Actives) (Scotland) Regulations 2011 for new developments to dispose of surface water using SUDS.

**5:** Supports the incorporation of existing watercourses, wetlands and ponds into placemaking. Suggests this section could be strengthened by clear reference to the multiple benefits of SUDS.

**5:** Reports that the second bullet point on foul drainage needs to accord more closely with SEPA policy and supporting guidance (Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements WAT-PS-06-08) and Supplementary Guidance: Developer Contributions 3: *Water and waste water drainage infrastructure* in the Proposed

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Aberdeenshire LDP.

**5:** Requests additional text on connection to a public or private sewerage system is added under this section.

### 01 Settlement Structure – 01.1 Landscape

**17:** Suggests additional text on enhancing biodiversity or creating new habitats on land with low environmental value.

### 01 Settlement Structure – 01.3 Green Settlement Pattern

**5:** Requests that SUDS be included in the types of multifunctional space which can deliver improvements to water quality, flood mitigation and habitat enhancement and amenity.

**15:** Suggests the justification text needs to include reference to parks, walkways and cycle routes.

### 01 Settlement Structure – 01.6 Co-location of facilities

**5:** Requests text is added to highlight the opportunity to use surplus energy recovery from certain types of industrial developments including some types of waste management facilities.

### 02 Environmental performance – 02.1 Energy

**6:** Suggests heat use should be considered at the planning stage and that all new developments should be required to consider whether there is a potential for heating sourcing locally or in the foreseeable future, and include consideration in the design stage the distribution and use of heat. Adds, if heat is available but is not proposed to be used, this should be supported by a reasoned justification.

### 02 Environmental performance – 02.3 Movement and transport

**13:** In the third bullet point under 'Economy', reports that damage to roads is not caused by cars but commercial vehicles. Therefore, reducing cars would not reduce road maintenance.

**15:** Queries what is the Energetica Transport Strategy or remove altogether. Reference is made to this but is not aware that it exists.

**15:** Suggests reference needs to be made to Local and Regional Transport Strategies and LDP/ Structure Plan regarding transportation including contribution to Strategic Transport Fund.

**15:** On page 46 suggests reordering the first three bullet points so that walking and cycling is first followed by public transport, cars and motorised vehicles.

**15:** On page 46 suggests amending the justification text to encourage active and sustainable travel first followed by reducing the need to travel by car.

**15:** On page 46 asks why there are standards for housing but no transport.

**15:** Highlights that on page 47 the first and third bullet points are the same as they are both about reducing CO<sup>2</sup> emissions from vehicles.

**23:** Notes no reference is made to the fact that movement and transport will support the development of path infrastructure.

### 02 Environmental performance – 02.5 Recycling and waste

**6:** Suggests the inclusion of the first bullet point is not necessary unless there is another "Energetica recycling and waste strategy".

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**5:** Reports the Zero Waste Plan has superseded the National Waste Strategy.

**5:** Requests text is added to highlight the opportunity to use surplus energy recovery from certain types of industrial developments including some types of waste management facilities.

### 02 Environmental performance – 02.6 Water

**5:** Welcomes the need for development to be accompanied by a comprehensive SUDS Plan in the section and the role that SUDS has in mitigation flood risk.

**5:** Request that reference is also made to Aberdeenshire Council's own policy guidance, Supplementary Guidance: Developer Contributions 3: *Water and waste water drainage infrastructure* in the Proposed Aberdeenshire LDP.

### 03 Built Form – 03.1 Streets as places

**15:** In the environment bullet point on page 57, reference should be made to facilitating walking and short/medium/long distance cycling.

**15:** In the quality of life bullet point on page 57, reference should be made to the reduction of speed limits and careful design in order to enhance road safety.

### 03 Built Form – 03.6 Heritage and Reuse of Assets

**17:** Suggests designs should include new habitats/homes for species that use old buildings/structures for roosting/nesting, and provide alternatives to replace old spaces.

### Other Comments

**16, 20 & 26:** The guidance will increase building costs dramatically.

**20:** Notes generally it is not a good document. Little reflection has been made on the views received from developers.

**24:** Expresses concern that the planning guidance is too cumbersome and fails to provide clear concise guidance.

**25:** Is unable to assist in consultation as no feedback has been received from the Grampian Housebuilders Committee.

**26:** Concerned that much of the environmental guidance in the document refers to English codes for compliance rather than Scottish ones. This will result in both conflict and additional burden on the design teams.

### **Modifications sought by those submitting representations:**

**Question 6: Do you find the planning advice document, usable, understandable, helpful and clear?**

**6:** Amend the advice so that it relates more clearly to the six criteria in the Supplementary Guidance and to define the requirement for the different types of development with explanations.

**6:** Guidance should give consideration to industrial and rural development.

**9 & 10:** amalgamate all documents into a single document that is more user-friendly. Must be seen to be in context with LDP allocations and policies.

**11:** Add visual examples of what is expected.

**Question 7: Do you think that the planning advice helps to meet the six criteria in the supplementary guidance?**

**6** Re-arranged the document to relate to the six criteria and the different types of development

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more specifically.

### **Question 8: Rate the Energetica Placemaking documents.**

**4:** Provide a better link between the three introductory sections in the Planning Advice to the remainder of the document and how they relate to the six criteria in the guidance.

**6:** Do not make the text any smaller and document any lengthier just make it more specific and targeted.

**6:** Add text to create linkages between the three documents.

**26:** Improve the images used in section 01.3 Green Settlement Pattern to avoid over simplifying the issue (e.g. on density).

**8:** Amalgamate the documents to simplify the requirements for development.

**24:** Prepare a short, concise, consolidated document setting out all the planning policies applicable to the Energetica Corridor.

### **Question 10: Other comments relating to the planning advice**

#### 1.0 Enhancing Quality of life - Landscape and green space

**4:** Add text highlighting that multiple benefits should help to limit potential adverse impacts on biodiversity and landscape associated with some energy crops.

**4:** Clarify the following statement “using the landscape as a resource for settlements including providing construction materials, fuel and food and other, low energy options.”

**14:** Provide further consideration of biodiversity conservation and enhancement; adding a need for a strategy to conserve and enhance natural features, habitats and biodiversity, which is linked to the national and local Biodiversity Actions Plans.

**17:** Include the need to maintain existing as well as creating new green networks.

**15:** Reference to corridor wide networks of footpaths should be amended to foot and cycle paths.

#### 1.0 Enhancing Quality of life - Movement networks

**2, 13 & 15:** Delete references to gravel surfaces on roads.

**15:** Where reference is made to Designing Streets the council roads standards should also be added.

**15:** Amend “walkable neighbourhoods” to “walkable/cycleable neighbourhoods”

**15:** Reorder the bullet points to follow a pedestrians, cyclists and public transport hierarchy.

#### 1.0 Enhancing Quality of life - Density Patterns

**4:** Clarify how high density settlements will be achieved while still retaining sufficient accessibility and high quality green space.

**5:** Add a bullet point highlighting the importance of considering the need to incorporate Sustainable Drainage in the design and layout of new developments in this section.

#### 1.0 Enhancing Quality of life - Integrating Industrial Environments

**5:** Add text highlighting the opportunity for energy recovery from certain types of industrial developments including some types of waste management facilities.

*Integrating Industrial Environments*



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### 1.0 Enhancing Quality of life - Heritage and Reuse of Assets

**17:** Add text highlighting the need to respect and protect designated nature conservation sites such as SSSIs and LNCS.

**17:** Add text requiring designs to include new habitats/homes for species that use old buildings/structures for roosting/nesting.

**17:** Suggests reference could be made to Supplementary Guidance on Natural Heritage in the Proposed LDP.

**17:** Clarify the meaning of planting of native species in “traditional patterns”.

### 2.0 Environmental Performance – Approach

**4:** Clarify what is meant by the target “ecological impact reduction target” and how this target will be assessed. Alternatively, rather than just reducing impacts, developments may be required to make a positive contribution to ecological interest and enjoyment.

**4:** Between pages 41 and 54 clarify who will be responsible for measuring the carbon and ecological impact targets and what will be done if these targets are not met?

### 2.0 Environmental Performance - Energy

**5:** Add text stating more clearly that the reference to alternative types of energy solutions can include the use of surplus heat and power recovery from industrial developments, such as waste facilities.

**6:** Add text requiring pipe work (to connect to a district/combined heat and power plant at a later date when heat becomes available in the future) to be incorporated within key infrastructure developments, such as new roads, industrial estates, residential and business developments to remove the need to retrofit.

### 2.0 Environmental Performance - Sustainable Transport

**13:** In the seventh bullet point acknowledge that emergency accesses still need to be maintained as well as disabled accesses.

**15:** Add additional text at the start of the introductory paragraph to encourage and promote active and sustainable travel before moving onto reducing reliance on private car travel.

**15:** In the second bullet point, add text requiring households needing to be within 400m of a bus stop with frequent services.

**15:** In the third bullet point, add text requiring Green travel plan to detail mode share targets and how these will be achieved, and not just mention carbon intensive travel to and from the site.

**15 & 23:** Add text on new development contributing to the development of additional local and regional walking and cycling routes, where gaps are identified.

**23:** Add text encouraging the development of a network of paths between settlements and the wider countryside to encourage sustainable transport.

### 2.0 Environmental Performance - Recycling and waste strategy

**5:** Add text setting out more clearly the opportunity for the recovery and reuse of surplus heat and power from certain types of waste management facilities.

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### 2.0 Environmental Performance - Water

**5:** In the first bullet point add additional text to highlight the multiple benefits of SUDS in terms of improvements to water quality, flood mitigation, habitat enhancement and amenity.

**5:** Amend the second bullet point on foul drainage to accord more closely with SEPA policy and supporting guidance (Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements WAT-PS-06-08) and Supplementary Guidance: Developer Contributions 3: *Water and waste water drainage infrastructure* in the Proposed Aberdeenshire LDP.

**5:** Add additional text on connection to a public or private sewerage system is added under this section.

- “Connection to a public sewer, as defined in the Sewerage (Scotland) Act 1968 is required for all new developments proposals either in settlement identified in the plan with a population equivalent of more than 2000 or wherever single developments of greater than 25 houses and large business and industrial units are proposed.
  
- In all other cases a connection to the public sewer is required unless:
  - The development is unable to connect to the public sewer for technical or economic reasons; and
  - The proposal is not likely to result in or add to significant environmental or health problems.
  
- Any such private system should discharge water to land rather than water where ground conditions are suitable.
  
- For all proposals where connection to a public sewer is not feasible and Scottish Water has confirmed public sewer improvements or first time public sewerage within its current investment programme that would enable the development to connect, a private system would only be supported if:
  - The system is designed and built to a standard which will allow adoption by Scottish Water.
  - The system is designed such that it can be easily connected to a public sewer in the future.

Typically, this will mean providing a drainage line up to a likely point of connection. The developer must provide Scottish Water with the funds to allow Scottish Water to complete the connection once the sewerage system has been upgraded.”

### 01 Settlement Structure – 01.1 Landscape

**17:** Add additional text on enhancing biodiversity or creating new habitats on land with low environmental value in this section.

### 01 Settlement Structure – 01.3 Green Settlement Pattern

**5:** In criterion 4, add that SUDS is a multifunctional space which can deliver improvements to water quality, flood mitigation and habitat enhancement and amenity.

**15:** In the justification text include reference to parks, walkways and cycle routes.

### 01 Settlement Structure – 01.6 Co-location of facilities

**5:** Add text highlighting the opportunity to use surplus energy recovery from certain types of industrial developments including some types of waste management facilities.

### 02 Environmental performance – 02.1 Energy

**6:** Add additional text in this section highlighting that heat use should be considered at the planning stage: that all new developments should be required to consider whether there is a potential for heating sourcing locally or in the foreseeable future; at the design stage consider

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the distribution and use of heat; and if heat is available but is not proposed to be used, this should be supported by a reasoned justification.

### 02 Environmental performance – 02.3 Movement and transport

- 13:** Delete criterion three under 'Economy' on page 47, regarding road maintenance.
- 15:** On page 46 reorder the three bullet points so that walking and cycling is first followed by public transport, cars and motorised vehicles.
- 15:** On page 46 amend the justification text to encourage active and sustainable travel first followed by reducing the need to travel by car.
- 15:** On page 46 add standards for transport.
- 15:** Clarify what the Energetica Transport Strategy is?
- 15:** Add text in this section to recognise the importance of Local and Regional Transport Strategies, the local development plans/Structure Plan and the Core Paths Plan.
- 15:** Add text requiring contributions to the Strategic Transport Fund.
- 15:** Under 'Environment' on page 47 combine the first and third bullet points on reducing CO<sup>2</sup> emissions from vehicles.
- 23:** Include reference to the development of path infrastructure and its long term maintenance to enable the promotion of walking and cycling.
- 23:** In this section, include the development of a strategic network of sustainable transport routes.

### 02 Environmental performance – 02.5 Recycling and waste

- 6:** Delete reference to the "Energetica recycling and waste strategy" in the first bullet point unless there is another strategy.
- 5:** Reports the Zero Waste Plan has superseded the National Waste Strategy.
- 5:** Add reference to the opportunity to use surplus energy recovery from some types of industrial developments, including some types of waste management facilities.

### 02 Environmental performance – 02.6 Water

- 5:** Add text to include a reference to Aberdeenshire Council's own policy guidance, Supplementary Guidance: Developer Contributions 3: *Water and waste water drainage infrastructure* in the Proposed Aberdeenshire LDP.

### 03 Built Form – 03.1 Streets as places

- 15:** Under 'Environment' on page 57 add to the second bullet point on page "facilitating walking and short/medium/long distance cycling..."
- 15:** Under 'Quality of life' on page 57 add to the second bullet point "reduce speed limits and careful design will enhance road safety."

### 03 Built Form – 03.6 Heritage and Reuse of Assets

- 17:** Add text requiring designs to include new habitats/homes for species that use old buildings/structures for roosting/nesting, and provide alternatives to replace old spaces.

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### Other Comments

**26:** Reduce reference to English codes for compliance and refer to the Scottish equivalent(s).

#### **Summary of responses (including reasons) by Planning Authority:**

The following comments are subject to review by the technical consultant, but provide the Planning Authorities response to the issues raised by the respondents.

#### **Question 6: Do you find the planning advice document, usable, understandable, helpful and clear?**

Support for the clarity and usability of the planning advice is welcomed.

The Planning Advice is not policy and only provides information on how the supplementary guidance criteria could be interpreted, other means to demonstrate compliance with the policy are also acceptable. Furthermore, at this early stage in the development of the Energetica Framework, developments within the corridor will only be required to demonstrate compliance with the six criteria in the supplementary guidance, unless exempt, and present this information in an Energetica compliance statement. In light of this the supplementary guidance is unlikely to conflict with the purposes of the Strategic Growth Area designations or result in dramatically increased costs for developers, and the Energetica aspirations will be deliverable in the long term.

It is agreed that the planning advice should relate more clearly to the six criteria in the Supplementary Guidance and to the different types of development, defining what exactly each requirement is looking to achieve and give explanations. Further clarity on the purpose of each section of the planning advice could be provided, and the supplementary guidance or planning advice could be re-ordered so that the advice should relates more clearly to the six criteria in the Supplementary Guidance.

The Energetica Framework by its nature orientates towards residential and town developments, as it seeks to improve peoples' quality of life by focusing on creating vibrant communities where people can interact. However, this does not exclude industrial and rural developments as the framework area includes both urban and rural areas, and it does not preclude single use developments.

The need for more visual examples on what is expected is noted and will be discussed with the technical consultant.

#### **Question 7: Do you think that the planning advice helps to meet the six criteria in the supplementary guidance?**

Support for the Planning Advice is welcomed.

In relation to the concerns raised by the respondents on aspirations and the criteria, the Energetica concept is a long term project and the development of this supplementary guidance is only one of several other projects that form part of this concept. Other projects include the Peterhead Southern Gateway Masterplan, and energy and technology supply chains.

Agencies such as Scottish Enterprise and ACSEF already support the Energetica concept, as intimated in the Foreword of the Planning Advice.

#### **Question 8: Rate the Energetica Placemaking documents.**

#### Layout of documents, diagrams, size of text, images, length of advice and language

Welcome the positive rating given to the documents.

Improving the linkages between the three documents (as discussed above in question 6) will be investigated with the consultants.

The images used in chapter 01 and 02 of the document will be reviewed to check they correctly interpret what that section is aiming to achieve.

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The amalgamation of the three documents is not supported as each serve a different function. The supplementary guidance provides clear and concise policy. The Planning Advice provides information on how each of the criteria in the supplementary guidance can demonstrate compliance with the policy. Finally the Overview provides an executive summary of the Energetica Framework concept and introduces it more simply than in detailed policy or advice to allow familiarity with the concept.

### **Question 9: Would you consider signing up to an 'Energetica Charter'?**

It is welcomed that the majority of respondents who answered the question said they would consider signing up to an Energetica Charter. Any such Charter would be prepared in conjunction with both Councils, Scottish Enterprise and ACSEF.

If developers sign up to an Energetica Charter, the use of its branding would be a positive tool for developers to market their sites to potential house buyers and employers, and provide long term advantages over other areas (e.g. creating a sustainable and positive lifestyle corridor). Reference to an Energetica Charter could be included within the Planning Advice in conjunction with the Energetica compliance statements or in the Overview document.

### **Question 10: Other comments relating to the planning advice**

#### Welcome/support

Support for the document is welcomed.

#### 1.0 Enhancing Quality of life - Landscape and green space

The purpose of Energetica is to create a new 'lifestyle' corridor and to use the landscape in a more active way as a means of improving peoples' quality of life. It is not a policy document that sets out measures to enhance/protect biodiversity directly or to preclude development or uses, such as energy crops or quarrying. Although the planting of energy crops fall outwith planning legislation, such uses may be acceptable within the corridor, and other policies in the LDPs provide the relevant protection to biodiversity and landscape, and advice on mineral developments.

One of the key principles under this section is to maintain the quality of the landscape, therefore no further change to the advice is proposed. Further advice on the maintaining existing green networks is also provided under the sub-heading 'Heritage and the reuse of existing assets' on page 10.

Notes the suggestion that reference to corridor wide networks of footpaths should be amended to foot and cycle paths, however, it is more appropriate to refer to paths generically and amend "footpaths" to "paths" throughout the document.

#### 1.0 Enhancing Quality of life - Movement networks

It is agreed that all references to the use of gravel surfaces on roads should be deleted.

National policy, Designing Streets is referred to in the advice on several occasions and it would be impracticable to recognise council road standards in every case. However, it is agreed that reference to the need for developments to recognise the council's roads standards could be made at least once, and in this section. Therefore, additional text could be added in the last sentence of the first paragraph: "...so, while having regard to the Council's roads standards, Energetica will seek to apply the principles of Designing Streets..."

The advice refers to the "wider sub-regional areas" in this section and "regional cycling and walking routes" under the sub-heading 'Sustainable transport'. Therefore it could be appropriate to make reference to the Local and Regional Transport Strategies in the Advice, which aim to develop an integrated transportation system for Aberdeenshire, and the Core Paths Plan.

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It is agreed that on page 8, the bullet point should be amended to “walkable/cycleable neighbourhoods” as the first bullet point under the sub-heading ‘Sustainable travel’ on page 12 refers to “mixed use developments...within walking/cycling distance”.

It is agreed that prioritising the bullet points by pedestrians, cyclists and public transport would be the correct hierarchical approach.

### 1.0 Enhancing Quality of life - Density Patterns

SNH’s comment is noted, but other policies in the LDPs protect important open spaces and the section titled ‘01.2 A legible/permeable movement framework’ encourages new developments to be well linked to open spaces.

As sustainable drainage systems will be influenced by the topography of the site, and the number and type of land uses, it would be appropriate to include an additional bullet point on the influence SUDS can have in the design and layout of a development.

### 1.0 Enhancing Quality of life - Integrating Industrial Environments

The suggestion to include text on recovering surplus heat and power in this section is welcomed, but it would be more appropriate to consider this under the sub-heading ‘Energy’.

It is acknowledged that some of the technical requirements within Designing Streets will be inappropriate for busy industrial roads, but this section is asking for the general principles of Designing Streets to be applied. Any issues would be raised in the Energetica compliance statement.

### 1.0 Enhancing Quality of life - Heritage and Reuse of Assets

It is agreed that due regard should be given to nature conservation sites in the planning advice, and a minor addition to the fifth bullet point is proposed.

However, it would not be appropriate or practical for the planning advice to make specific reference to the environmental policies in the LDPs, as this would have to be done for all the relevant policies.

The need for developments to include new habitats/homes for species that use old buildings/structures for roosting/nesting would be more appropriately considered at the design stage, where this requirement may be identified.

It is agreed that further explanation is needed on what is meant by the planting of native species in “traditional patterns”.

### 2.0 Environmental Performance - Approach

Encouraging developments to adopt an ecological [footprint] impact reduction target and a carbon emission reduction target as two of their core aims is a positive step forward in achieving the Government’s aspiration to reduce the country’s ecological footprint the Climate Change Act. Assessing these targets would be achieved through measuring carbon emission reductions through standard methodologies already applied, which are referred to in later chapters of the advice. Furthermore, as developments will be encouraged to reduce their ecological footprint, they are likely to make a positive contribution to ecological interest and enjoyment.

### 2.0 Environmental Performance - Energy

It is agreed that further reference could be made to the use of surplus heat and power recovery in the second bullet point, which seeks the exploration of potential sources of energy.

The installation of pipe work for heat use at a later date could be included as an example in

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the fourth bullet point, which makes reference to building retrofit options.

### 2.0 Environmental Performance - Sustainable Transport

The concerns raised on road infrastructure and car parking are noted, but as these issues are likely to be discussed on a case by case basis there is no need to amend the document, which is also only advice.

It is not considered necessary to expand the introductory text of this section to encourage and promote active and sustainable travel as the position of reducing carbon emissions and encouraging sustainable transport is sufficiently considered in the Structure Plan and local development plan policies.

It is agreed that the second bullet point should be amended to require bus stops with frequent services being no more than 400m from a dwelling.

It is agreed that the third bullet point should be amended to require Green travel plans to provide detail on mode share targets and how these will be achieved, and not just mention carbon intensive travel to and from the site.

In relation to integrating regional walking and cycling routes in new developments, and creating a network of paths between settlements, no further amendment of the fourth bullet point is required. Developers are required to contribute to this and other infrastructure where their development creates a need for it, and Chapter 01.1 *A positive relationship with the landscape* encourages the development of new paths. However, developer contributions cannot be sought where there is a general desire for it. Creating linkages between settlements is more appropriately considered in the Core Paths Plan and in other Energetica projects, including a coastal path network between settlements.

### 2.0 Environmental Performance - Recycling and waste strategy

The comment on reusing surplus heat and power from certain types of waste management facilities is noted, but this section focuses on reducing waste to landfill. The second bullet point in chapter 02.1 'Energy' encourages new development to follow a formal energy hierarchy approach – reduce, re-use and recycle. In light of this, no change to this section is proposed.

### 2.0 Environmental Performance - Water

In relation to SUDS, as they are now a legal requirement for new developments, it is proposed that the opening sentence of the first bullet point is amended to “the design of ...” and after “biodiversity strategy” add “(e.g. improvements to water quality, flood mitigation, habitat enhancement and amenity)...”.

It is agreed that the second bullet should be amended to require foul drainage to accord more closely with SEPA policy and supporting guidance. “(giving due consideration to SEPA’s *Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements WAT-PS-06-08*, and the relevant policies in the Local Development Plans)”.

Adding additional text on developments connecting to a public or private sewerage system is not considered necessary as sewerage connections will be required to conform to the relevant policies in the LDPs. Furthermore, to ensure a short and concise document, the proposed amendment to the second bullet giving reference to the LDP should suffice.

### 01 Settlement Structure – 01.1 Landscape

No change to this chapter is required as other policies in the LDPs encourage the enhancement of biodiversity or creation of new habitats regardless of whether the site is on land of low environmental value.

### 01 Settlement Structure – 01.3 Green Settlement Pattern

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It is agreed that the fourth bullet point could include SUDS as it performs a number of different functions, including improvements to water quality, flood mitigation and habitat enhancement and amenity.

It is agreed that the justification text needs to include cycle routes in the paragraph.

### 01 Settlement Structure – 01.6 Co-location of facilities

The comment on using surplus energy recovery from certain types of industrial developments including some types of waste management facilities is noted, but this section focuses on the location of new facilities (i.e. mixed uses). The second bullet point in chapter 02.1 'Energy' encourages new development to follow a formal energy hierarchy approach – reduce, re-use and recycle. In light of this, no change to this section is proposed.

### 02 Environmental performance – 02.1 Energy

It is agreed that developers should give consideration to the source of energy that will provide heat and power their developments at the design stage, but it is preferable to keep this chapter generic (i.e. not specify one type of energy over another). Furthermore, in chapter 2.0 *Environmental Performance – Energy*, an amendment is proposed to the second bullet point to highlight the use of surplus heat and power from industrial developments, including waste facilities.

### 02 Environmental performance – 02.3 Movement and transport

It is noted that commercial vehicles rather than cars damage roads, but this criterion highlights what may happen, especially on residential streets, and in light of the recent severe winter conditions that have affected many roads in the region.

In relation to the Energetica strategies referred to in the Advice, including the Energetica Transport Strategy, these strategies do not exist at present, and the Advice should be amended to make reference to other Energetica work streams, where necessary.

The respondent does not state why reference needs to be made to Local and Regional Transport Strategies and LDP/ Structure Plan (e.g. in light of specific projects) in this chapter. It is proposed that these strategies are referred to sub-chapter *Movement networks* under chapter 1.0 *Enhancing the quality of life*, therefore there is no further requirement to include them under this section. It is also not the purpose of this document to set out developer contribution requirements, therefore it is not supported that reference should be made to the Strategic Transport Fund.

No change to the bullet points or justification text is supporting as the Advice is not seeking a hierarchical approach to reducing carbon emissions. Instead developments are expected to make a significant contribution to the carbon and ecological impact reduction targets. To achieve this, it is expected that all new development should be linking with and supporting public transport options, reducing dependency on fossil fuels, and promoting walking and cycling routes.

The standards listed in the document relate to buildings only and transport standards are sufficiently considered in appropriate transport documents/strategies.

The first and third bullet points on page 47 under 'Environment' although refer to reducing CO<sup>2</sup> emissions from vehicles, the first refers to vehicle use and the third refers to car ownership. In light of this, they are not considered the same and will remain unchanged.

It is agreed that this section will support the development of path infrastructure, therefore the start of the fourth bullet point under 'Quality of life' could be amended to highlight this.



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### 02 Environmental performance – 02.5 Recycling and waste

Advice should be amended to make reference to other Energetica work streams, where necessary and delete reference to the Energetica recycle and waste strategy.

It is noted that the Zero Waste Plan has superseded the National Waste Strategy. The justification text will be amended accordingly.

The comment on reusing surplus energy from certain types of waste management facilities is noted, but this section focuses on reducing waste to landfill. The second bullet point in chapter 02.1 'Energy' encourages new development to follow a formal energy hierarchy approach – reduce, re-use and recycle. In light of this, no change to this section is proposed.

### 02 Environmental performance – 02.6 Water

SEPA's comment on SUDS Plans is welcomed. However, adding additional text to refer to the Councils own policy guidance is not considered necessary as water and waste drainage infrastructure will be required to conform to the relevant policies in the LDPs regardless. Furthermore, to ensure a short and concise document, the proposed amendment to the second bullet under chapter 2.0 Environmental Performance – *An integrated approach to water*, which refers to the LDP should suffice.

### 03 Built Form – 03.1 Streets as places

It is agreed that the second bullet point on page 57 under *Environment* should refer to facilitating walking and short/medium/long distance cycling.

It is agreed that careful design as well as reduced speed limits is likely to enhance road safety. Therefore, the second bullet point under *Quality of life* should be amended as suggested.

### 03 Built Form – 03.6 Heritage and Reuse of Assets

As discussed above, the need for developments to include new habitats/homes for species that use old buildings/structures for roosting/nesting would be more appropriately considered at the design stage, where this requirement may be identified. ~The requirement to enhance natural heritage is also considered in the LDP policies and/or supplementary guidance.

### Other Comments

The concern raised by a number of respondents that the guidance will increase building costs dramatically and that developer views have not been taken into account is noted. However, at this stage, applicants are only asked to demonstrate how they can or cannot achieve each criterion in the supplementary guidance. The planning advice provides guidance on how the criterion could be achieved.

In relation to the concern that the planning guidance is too cumbersome and fails to provide clear concise guidance, further consideration will be given to improving the links between the supplementary guidance criteria with the contents of the planning advice to make it clearer.

It is not agreed that much of the document refers to English codes for compliance rather than Scottish ones, as although EcoHomes was replaced by the Code for Sustainable Homes in 2007, it continues to be used for new build projects in Scotland. Furthermore, there is only one reference in the advice to the Code for Sustainable Homes, which is in the fourth bullet point on page 42 under section 02.1 Energy. In light of this, the fourth bullet point could be deleted or amended to refer to the Sullivan Report or Ecohomes.

In light of comments from Grampian Police on the supplementary guidance, specific reference should be made in the Planning Advice to designing out crime, as necessary.

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### **Any further plan changes commended by the Planning Authority:**

The proposed modifications are subject to review by the technical consultant, but the following provides the Planning Authorities suggested changes.

#### 1.0 Enhancing Quality of life - Movement networks

In the last sentence of the first paragraph add, "...so, while having regard to the Council's roads standards, Energetica will seek to apply the principles of Designing Streets..."

In the first paragraph, add a new sentence after the first sentence highlighting Energetica's support towards meeting the Local and Regional Transport Strategies, which aim to develop an integrated transportation system for Aberdeen City and Aberdeenshire, and the Core Path Plans.

#### 1.0 Enhancing Quality of life - Density Patterns

Add a new bullet point at the end, "encouraging developers to have sufficient land for the design and layout of Sustainable Drainage systems."

#### 1.0 Enhancing Quality of life - Integrating Industrial Environments

Add a new bullet point at the end of this section, "exploring the opportunity for recovering surplus heat and power for use in nearby developments at an early stage".

#### 1.0 Enhancing Quality of life - Heritage and Reuse of Assets

In the fifth bullet point add, "must pay due regard to nature conservation sites and the Landscape Character Areas, ..."

In the third bullet point provide an example of what is meant by the planting of native species in "traditional patterns".

#### 2.0 Environmental Performance - Energy

In the second bullet point after "alternative utility delivery vehicles" add ", such as the use of surplus heat and power from industrial developments, including waste facilities, "

In the third bullet point after "building retrofit options" add "(e.g. pipe work)"

#### 2.0 Environmental Performance - Sustainable Transport

In the second bullet point add "and bus stops with frequent services" after "services".

In the third bullet point replace "green transport strategy" to "green travel plan" and add "...should provide detail on mode share targets and reducing carbon ... and how these will be achieved".

#### 2.0 Environmental Performance - Water

At the start of the first bullet point is delete "provide" and replace with "the design of ..." and after "biodiversity strategy" add "(e.g. improvements to water quality, flood mitigation, habitat enhancement and amenity)..."

In the second bullet add at the end, "(giving due consideration to SEPA's *Policy and Supporting Guidance on Provision of Waste Water Drainage in Settlements WAT-PS-06-08*, and the relevant policies in the Local Development Plans)".

#### 01 Settlement Structure – 01.3 Green Settlement Pattern

In the forth bullet point add "SUDS," after "such as".

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In the justification text add “cycle routes” after “parks”.

### 02 Environmental performance – 02.3 Movement and transport

Delete reference to the Energetica Transport Strategy, and refer to other Energetica work streams, if relevant to this chapter.

On page 47, under ‘Quality of life’ amend the start of the forth bullet point, “increased path infrastructure will result in making developments more pleasant ...”

### 02 Environmental performance – 02.5 Recycling and waste

In the justification text replace “National Waste Strategy” with “Zero Waste Plan”.

Delete reference to the Energetica waste and recycling Strategy, and refer to other Energetica work streams, if relevant to this chapter.

### 03 Built Form – 03.1 Streets as places

On page 57 under *Environment* add additional text to the second bullet point, “facilitating walking and short/medium/long distance cycling...”

On page 57, under *Quality of life* add additional text to the second bullet point, “reduce speed limits and careful design will enhance road safety.”

### Other Comments

Add text to establish clearer links between the planning advice and supplementary guidance criteria.

On page 42, delete or amend the forth bullet point to refer to the Sullivan Report or Ecohomes.

With reference to the comments from Grampian Police on the supplementary guidance make specific reference to designing out crime where there is reference to security, mixed uses and design of public open space.

### **Committees’ decision:**

<INSERT TEXT>

### **Committees’ recommendations:**

<INSERT TEXT>