

## Appendix 2 MIR Summary Analysis

### MIR Question 1 – The Vision

Do you agree with the preferred “vision” for the area?

If not, what “vision” would you propose that aligns with the overall objective in the Argyll and Bute Outcome Improvement Plan. (ABOIP)

108 responses

83 agreed

25 disagreed

#### Key Points Against:

- The vision does not place any emphasis on a low-carbon economy.
- The vision does not take into account that the environment (natural/historic) provides an economic driver for tourism
- The vision emphasises population growth rather than stability.
- The vision does not mention social or cultural elements.
- The use of the word ‘flexible’ should not undermine the certainty required in the LDP.

#### Key points to be addressed:

- Review vision statement in light of positive comments regarding low-carbon development and the issue of the natural/historic environment.

#### PLDP Response

The Vision was revised in light of the comments submitted and now includes reference to low-carbon development and the natural/historic environment.

### MIR Question 2 – Simplified Key Objectives

Do you agree with the proposed simplified key objectives for LDP2 as set out in Table 1.

If not, what key objectives would you propose that take into consideration National Planning Policy and the Argyll and Bute Outcome Improvement Plan?

100 Responses

83 agreed

17 disagreed

#### Key points to be addressed/considered:

- A general impression that people are struggling somewhat to understand the objectives and how they work together (there is an impression from some that they contradict each other)
- A general impression of a desire to see more detail over what they aim to deliver and how.

We maybe need to consider adding more detail about how the LDP will deliver SOA outcomes and the LDP vision and balance any perceived conflict between growth and protection.

- Some people are confused by the National/SOA objectives and their relationship to the LDP objectives.

We maybe need to consider ensuring there is sufficient clarity, explanation and consistency in the objectives. There is potential scope to use the objectives to promote clearly how the LDP will deliver.

#### **PLDP response**

The LDP presents seven objectives including short explanations of how each objective is to be achieved.

### **MIR Question 3 – Removing Allocations**

**Do you agree with the councils preferred option to promote deliverability of new developments by removing allocations that are failing to deliver, and only include sites in the next LDP it considers are deliverable in the next 5-10 years**

**111 responses**

**81 agree**

**30 disagree**

#### **Comments in support:**

- The proactive step to deallocate undelivered sites is not disputed but this must be done in combination with an approach to identify and allocate deliverable sites, in line with SPP policy guidance stated above.
- However there needs to be a discussion with people about the deliverability pre-removing the sites. It may be that it has stalled due to money issues but solutions maybe found.
- The Local Plan is there to provide a degree of certainty to developers and residents. The fact that there are a lot of allocations in the LP that are not being developed and at the same time a large proportion of approvals are coming from windfall sites indicates that the allocations in the LP aren't right. I suspect that there are too many allocations in the plan where there is poor market demand or where the sites are uneconomic to develop because of issues, e.g. drainage
- In order to meet housing objectives, undeveloped sites should be removed from the LDP and focus given to new sites which owners are willing to develop immediately.
- This approach is advocated. If too many sites continue to be allocated and are not developed it results in a negative perception of both the site and settlement it is located within. Sites that fail to deliver blight communities.
- Yes, deliverability is a key factor for any development plan and it is imperative that all stakeholders have confidence in what the plan is expecting to come forward will come forward.

#### **Comments against:**

- This will pressure other sites which will result in blight and anxiety for affected neighbours unnecessarily. Development of the present allocation should be assessed for likelihood, and encouraged to proceed.
- Removing any potential future sites would seem to reduce the Council's flexibility on planning in the future in the event of unforeseen changes.
- I would support keeping all current housing allocations in the new LDP as it would potentially ensure more efficiency if any of these became current.
- Promoting something by removing options does not make sense. Keep your options open

- There are many good developments that have taken time to be developed and these should be retained. The fact that these developments have not been realised to date is in many cases the product of numerous factors that have taken time to be resolved and overcome. These historical allocations should be retained.

#### **PLDP response**

A full review has been undertaken of all Allocations and Potential Development Areas, including reference to the annual Housing Land Audits, and many of these have been removed where they have been in the development plan for a number of years and have not been subject to the submission of planning applications.

## **MIR Question 4 – Windfall Development**

### **Allowing Flexibility for Windfall Development**

**The preferred option is for the plan, in order to encourage a flexible approach to delivery, to make an allowance (25%) for windfall sites within its housing land supply rather than just relying on allocations, and ensure settlements boundaries are large enough to facilitate this**

**Do you agree with this option?**

**102 responses**

**71 agreed**

**31 disagreed**

### **Key Points Against/Areas of concern:**

- A number of responders misinterpreted the question being asked in that they wished to comment on whether there should/should not be more windfall development rather than whether we should allow a proportion of the housing supply we have to identify to come from those windfalls. The plan already makes proviso for windfall development and will continue to do so subject to the eventual policies which, in part, are discussed elsewhere in the MIR

### **Key areas of support:**

- Increases flexibility – but would be helpful to define elements of flexibility
- Enables development in smaller/fragile communities – important to communities
- Will allow small sites to come forward
- Not always possible to deliver allocated sites. Large sites aimed at big developers who are not flexible/diverse enough. Just because allocations have not been taken up does not mean there is not demand.

### **PLDP response**

The LDP seeks to provide a balance between allocated sites and windfall development with a 25% allowance for each planning area and a commitment to continuously monitor the position using the Annual Housing Land Audit and the Housing Needs Demand Assessment

## **MIR Question 5 – Scales of Development**

**“Do you agree with the preferred option to remove the application of scales of development and simply rely on the settlement strategy and settlement boundaries to guide the different scales and quantities of development?”**

**We propose to review settlement boundaries to ensure that the appropriate scale and volume of development can be accommodated within them for at least the life of the plan.”**

**119 responses**

**88 agreed**

**31 disagreed**

### **Key Points Against/Areas of concern:**

- Concern that removing the application of 'scales of Development' could undermine the settlement strategy.
- Scales of development are required to prevent smaller settlements being dwarfed by development of an inappropriate scale.
- The scales of development are needed to prevent over-development and loss of community/character.
- The removal of scales of development would appear to mean that there would be a rather more vague approach to housing development.

### **Key Areas of Support:**

- Retaining scales of development may unduly restrict the development potential of sites. Each proposals should be considered on its own merits.
- Scales can be decided when a site is developed.
- Agree that it would seem sensible to rely on settlement strategies and settlement boundaries to guide different scales of development.
- Reducing reliance on scale would be acceptable provided that the plan continues to identify allocations, PDAs and defined settlement boundaries.

### **PLDP response**

New development will be expected to respect the scale and fit for the settlement within which it is located, respects the character and appearance of the surrounding townscape and is compatible with surrounding land uses. These policy constraints will ensure that the scales of development will be appropriate to the location without being prescriptive.

## MIR Question 6 – Tobermory-Oban-Dalmally Growth Corridor

### Tobermory – Dalmally Growth Corridor

Do you agree with the preferred option of the Council to promote the Tobermory-Oban-Dalmally growth corridor in order to build and *deliver* on the potential growth of population and employment opportunities in this area. A more, *flexible* and promotional approach would be taken to development supporting the growth of the corridor.

61 responses

50 agreed

11 disagreed

#### Key Points Against/Areas of concern:

- Policy needs to avoid any potential ribboning of settlements or stringing of development along the corridor – should be confined to settlements and their edges
- Corridor should encourage community/village style developments that compliment the environment
- The plan should mention the need for improved road and rail infrastructure
- Concerns raised regarding the suitability of the infrastructure capability to deliver the vision.
- Not clear what the corridor means in real terms – what would it promote/develop
- The corridor should not stifle land in other areas

#### Key Areas of Support:

- There are enough service villages (Dunbeg/Connel/North Connel/ Taynuilt/Dalmally) to make it viable
- Corridor reflects the growth trend occurring/historic demand
- Supports growth and population increase
- Will encourage investment
- It would be an integrated development opportunity for local economy
- It addresses sustainability
- Will energise landscape, business and community assets
- Offers significant tourism potential

#### PLDP response

The settlement strategy seeks to promote economically driven growth in locations where growth is projected to occur including the Tobermory – Dalmally corridor including the Oban conurbation which has been identified as having growing economic opportunities in the food and drink, tourism and education sectors.

## MIR Q 7 – Delivering an Oban Strategic Development Framework

Do you agree with the preferred option of the Council to prioritise development and implementation of an Oban Strategic Development Framework, which will consider the rationalisation of existing land uses, aim

**to deliver improved traffic management, and subsequently identify new development opportunities for housing and business.**

**56 responses**

**53 agreed**

**3 disagreed**

**Key Points Against:**

- The Oban Development Road is required as a solution for traffic management and development opportunities as opposed to further planning
- Prioritisation of funding in the Oban area may detract from other priorities such as regeneration e.g. Dunoon

**Key points to be addressed:**

- Need for improved traffic management, in particular George Street. Park and Ride Facility potential to be investigated – N and S of town. Oban Development Road is a solution. Land rationalisation is part of the solution.
- Linkage to Tobermory to Dalmally Growth corridor. Oban needs to work in terms of traffic management. An Oban bypass is an integral element of delivering the growth corridor and realising Oban's potential.
- Engagement in process – key stakeholders inc. – Oban Community Council, Council, Housing Associations, Landowner, property developers, BIDS. Desire noted about use of local expertise.
- Strategic Transport hub – relates to traffic management, development opportunities, parking, tourism, visitor experience, physical constraints

**PLDP response**

A proposal that the Council will take forward a Strategic Development Framework including the identification of new development opportunities; development of the Strategic Transport Hub and the investigation of potential improvements to the strategic road network including the potential for a new Oban development road.

## **MIR Q 8 – Oban Development Road**

**Do you agree with the preferred option of the Council to remove the Oban Development Road from the LDP as it is a long term aspiration unlikely to be realised during the plan period (2020 – 2030), and does not release suitable development land.**

**48 responses**

**33 agreed**

**15 disagreed**

## MIR Q 8A – Oban Development Road

Should we promote the delivery of the Oban Development Road to release development opportunities and improve traffic management? This requires a commitment to update studies, options appraisal, action programming by the Council and its partners and potential funding streams to be identified.

40 responses

22 agreed

18 disagreed

### Key Points against removal:

- ODR is critical to the future of Oban (economic, traffic management, movement, homes, network resilience). Oban is the Main Town in a growth area and therefore this requires to be a priority.
- Risk of more piecemeal development without the ODR. A strategic approach to growth would be challenging without the ODR.
- Resilience of the road network could be improved with the ODR in place. This has wider implications, including for Dunbeg.

### Key points for removal:

- Undeliverable – finance – not available in current economic circumstances, technically – not fully investigated, outputs – not demonstrated as deliverable nor as best solution, need to meet with SPP requirements re infrastructure.
- Impact of bypass on passing trade.

### PLDP response

The LDP supports this as a component of a wider proposal for a Strategic Development Framework for the Oban area.

## MIR Question 9 – Helensburgh and Lomond Growth Area

Do you agree with the preferred option of the Council to promote Helensburgh and Lomond as a growth area in order to build and *deliver* on the existing and potential growth of population and employment opportunities in this area? A more, flexible and promotional approach would be taken to development supporting growth of the area, but recognising the green belt setting.

72 responses

57 agreed

15 disagreed

### Key Points Against/Areas of concern:

- All key towns should be promoted as potential growth areas - targeting of resource at one area could conceivably have a knock on effect for other areas.
- The A814 is already the busiest road in Argyll & Bute and the additional traffic generated by large-scale development would cause increased congestion within the area and on routes to the central belt.

- Protection of Green Belt should be of paramount importance in any planning process or application in this area.
- This is an area of outstanding beauty. To increase the population further threatens to reduce the area to which thousands of tourists are attracted, reducing the benefit to only those living within the area.

#### **Key Areas of Support:**

- We are in agreement with the Council's option to promote Helensburgh and Lomond as a growth area. Particularly given the economic context of the HMNB Clyde submariner base attracting around 1,500 new staff by 2025 (MIR page 25). This is a significant opportunity for population growth and employment and economic opportunities, not only in the MoD and naval supply chain but also knock-on effects for the local economy in many sectors.
- Helensburgh is an important employment and shopping centre and therefore should be identified for further employment and housing growth. The Local Plan should identify this whilst protecting the green belt setting.

#### **PLDP response**

The LDP proposes a Helensburgh Strategic Development Framework based on reviewing the Helensburgh and Lomond Greenbelt to provide a future framework for the provision of infrastructure and future development and to take advantage of the proximity of the central belt and the opportunities afforded by the expansion of HMNB Clyde (Faslane).

### **MIR Question 10 – Green Belt**

**Recognising that in the medium to long term Helensburgh and Lomond is likely to experience economic and population growth, supported by the strategy of the plan, it is proposed that the Green Belt is retained as it is in the next LDP 2. However in order to deliver certainty over the longer term (20-40 years) , a further review of the Green Belt boundaries through a Strategic Masterplan approach will be carried out, setting a framework for infrastructure and future development. This could then be incorporated in a subsequent Local Development Plan review process as necessary. Do you agree with this approach?**

**70 responses**

**46 agreed**

**24 disagreed**

#### **Key Points Against/Areas of concern:**

- Members of the public in Helensburgh and Lomond are concerned that Greenbelt could be removed in its entirety.
- Concern about retention of existing character, ensuring protected open space in settlements retained.
- Green belt should be retained and not have boundaries reviewed.

#### **Key Areas of Support:**

- Full public consultation on review and terms of reference required.
- Greenbelt setting crucial, landscape setting and attractiveness as place to live important in attempts to promote growth.

- GB review should consider wildlife habitat and amenity.
- Need to protect good farm land and areas of natural beauty.

#### **PLDP response**

The LDP proposes a review of the Helensburgh and Lomond Greenbelt boundaries through a Strategic Development Framework that takes into account key environmental features, the landscape setting of settlements and the contribution of the green network around these settlements.

## **MIR Question 11 – Developer Contributions**

**Do you agree with the preferred approach within identified Growth Areas, to seek appropriate and proportionate developer contributions in order to assist delivery of access and transport improvements, education, affordable housing and green infrastructure?**

**87 responses**

**76 agreed**

**11 disagreed**

#### **Key points against:**

- The application of developer contributions may inhibit development.
- Increased growth would result in increased revenues to the council which should be used to provide necessary infrastructure.

#### **Key points to be addressed:**

- Defining what infrastructure shortfalls there are in particular areas
- Quantifying the longer term costs of this infrastructure provision and apportioning these costs to particular development typologies.

#### **PLDP response**

The LDP has a policy on Developer Contributions that takes into account the relatively low levels of development viability within Argyll and Bute and therefore any planning gain extracted should be proportionate to the scale, nature and impact of development. In addition there is a continuing requirement for the provision of affordable housing as a component of larger developments where there is an identified need through the HNDA.

## **MIR Question 12 – Marine industries**

**Do you agree with the preferred option for the Council, which is to support the growing Seafood and Marine sector by:-**

- **Safeguarding an expansion area adjacent the European Marine Science Park, Dunbeg,**
- **Identifying new sites and expansion areas for marine industries, as shown in the proposed allocation schedules,**
- **Developing a Marine Industries: Infrastructure Requirements Assessment to identify the onshore requirements of all marine related industries and subsequently seek to facilitate delivery.**

- **Safeguarding locations that have particular suitability for on shore infrastructure to support marine industries (such as existing piers, jetties or harbour facilities, and deep water marine access sites).**

**80 responses**

**66 agreed**

**14 disagree**

**Key Points to be addressed:**

- Dunbeg - Barcaldine - zone for the expansion of marine sciences. Retain young people, skilled employment.
- Need for co-ordinated approach
- Build on existing locations, avoid scattered approach
- Improved pier facilities - cost savings, increase jobs. Aquaculture needs the infrastructure to continue to grow. Already missed opportunities e.g. Harvest Feed Mill – infrastructure
- Consider waterbourne transport options
- Continual additional restrictions such as MPAs and aquaculture developments can impact on access to harvesting waters. Activities may impact habitats. Both can lead to vessel displacement and impact fragile coastal communities.
- Maritime environment is one of ABs greatest assets.
- Brownfield sites should be promoted over greenfield
- Sea Gateways to LLTNP should be taken into consideration (scale, nature and location of development - impact on seascape and landscape)
- When supporting emerging developments or new offshore industries the potential impacts on inshore fishing sector needs to be considered.
- Potential for seaweed aquaculture. Needs to be sustainable and of appropriate scale. Onshore processing needs to be considered in order to bring local added value and job creation from this sector.
- Sailing needs to be taken into account
- Enhance and support waterbourne transport options.

**PLDP response**

The LDP has a specific policy on supporting sustainable aquatic and coastal development which seeks to balance environmental impacts of marine industries such as aquaculture against their relative economic benefit, and to provide a policy framework for the development of the most efficient and least environmentally sensitive sites.

**MIR Q 13 – Flexible Policy on Tourism Development**

**Do you agree with the preferred approach, which is to create a more positive and simple policy framework for tourism development to come forward flexibly in the countryside whilst safeguarding the valued environmental resources of our area?**

**103 responses**

**96 agreed**

**7 disagreed**

**Key points against:**

- Flexibility and simplification could undermine valued countryside assets.

**Key points to be addressed:**

- Tourism development must comply with all other environmental policy including flood risk and foul drainage.
- Tourism development policy must protect valued environmental and heritage assets.
- Tourism development policy must not undermine the spatial strategy.

**PLDP response**

The LDP contains a policy on tourist development, accommodation, infrastructure and facilities which suggests a presumption in favour of new/improved tourist facilities and accommodation subject to a range of criteria that inter-alia protects the natural and built environment. There is also policy provision for informal outdoor recreation and leisure development.

**MIR Q 14 – Marine and Coastal National Park**

**Do you agree with the Council's preferred option to explore the potential to create a new National Park within Argyll and Bute?**

The concept would be a coastal/marine Argyll and Islands National Park which recognised that our heritage includes agriculture, seafood industries, forestry and tourism industries, potentially including the western seaboard of Argyll including Mull, Coll, and Tiree, Islay, Gigha, and the west Kintyre coast, the National Scenic Areas of Knapdale; Lynn of Lorn; as well as Jura, Scarba, Lunga and the Garvellachs

If a review of National Parks is to be instigated by the Scottish Government then Argyll and Bute would actively seek to be included in this review in order that the options can be fully appraised at that time.

101 responses

61 agreed

40 disagreed

**MIR Q 15 – Marine and Coastal National Park**

It is further proposed that:

- The boundaries of the coastal/marine Argyll and Islands National Park area must be wholly within the Argyll and Bute Council area;
- The Council retains the town and country planning function;
- That substantial resources are made available to both the Local Authority and the National Park to ensure the successful implementation of the Park and to ensure that the aims and objectives of the Park can be delivered;
- That the Park should have as its driving force the aim of securing the social and economic development of our communities;
- The Park should not in any way jeopardise our indigenous local industries of fishing, agriculture, aquaculture and tourism;

- That the vast majority of the members of the National Park Board must be from those living and working in the Park area;
- The governance model adopted should not represent a large costly bureaucratic organisation

Do you agree with the above proposals?

87 responses

47 agreed

40 disagreed

The key issues raised could provide a framework for any future investigation.

Alternate proposals should be considered as part of any exploration of potential for a Coastal and Marine National Park

**Key Issues Raised:**

- Control and governance issues have been raised:-
- Need for further information to make an informed decision.
- Economy.
- Renewables
- Environmental
- Social
- Costs
- Boundary

**PLDP response**

It is apparent that the concept of a marine National Park raises a number of significant issues, many of which are outwith the scope and competence of an LDP. Absent any other drivers, it is not considered practical to introduce the concept of a marine National Park as a proposal in the LDP, and that such a proposal would need to be progressed through economic development strategies and other mechanisms.

## **MIR Question 16 – Cruachan Dam**

The preferred option is to support the delivery of the nationally identified project at Cruachan Dam and make every effort to maximise the direct and indirect economic benefit for Argyll and Bute through associated accommodation and tourism developments promoted within the Tobermory-Oban–Dalmally growth corridor.

Do you agree with this option?

65 responses

58 agreed

7 disagreed

**Key Areas of Support:**

- Logical to develop the existing facility

- Opportunities for economic benefit/trickle down – from accommodation provision, investment in infrastructure to protect our primary energy generator
- Potential benefits for tourism – the visitor centre itself and wider possibilities e.g. proposed Tyndrum to Oban footpath, a possible Loch Awe Forest Park and sustainable wider network of resources along Loch Etive and Glen Orchy
- Green energy production

**Key Points Against/Areas of concern:**

- That we need to see more details of the proposal to assess potential impacts on environment (woodlands, flooding etc.) and concerns/comments that it must be sympathetic to the environment, eco-friendly and there are concerns about potential environmental loss.
- The project may require wider infrastructure upgrades (pylons, substations, tracks) and we would need to support those too. The preference should be to re-power/extend existing to fit with sustainability agenda.  
We need more information and to carefully consider the impacts of wider infrastructure and there are concerns on their impact on the environment and tourism.
- We need to consider the impacts of the project on tourism
- Concerns/comments about the long term legacy – how we retain workers from the construction phase in Argyll, ongoing economic legacy.

**PLDP response**

The LDP contains a proposal to support the National Planning Framework 3 project to increase the pumped storage hydro-electricity capacity at Cruachan Dam and to work in partnership to manage both the negative and positive impacts that such a proposal would have and to maximise both the direct and indirect economic benefits.

**MIR Q 17- Regeneration in Campbeltown, Rothesay and Dunoon**

**Do you agree with the preferred approach to maintain the regeneration focus in Campbeltown, Rothesay and Dunoon, continuing to make these locations more attractive destinations, and to apply a flexible policy approach to development which clearly demonstrates it supports the economic and population growth in these towns?**

**57 responses**

**56 agreed**

**1 disagreed**

**Key Points Against:**

- Directing resources to these towns may disadvantage more remote rural areas.
- Flexibility should not result in the loss of assets or the misdirection of resources.
- Some hostility and scepticism relating to fixed links to Dunoon.

**Key points to be addressed:**

- Ensuring that resources are distributed equitably and to best effect.

#### **PLDP response**

The LDP supports regeneration in these main towns and indicates that brownfield land should be the focus of redevelopment in these settlements.

### **MIR Question 18 – Promotion of Mid Argyll’s identity through a range of activities**

Do you agree with the preferred approach, which is to promote Mid Argyll’s identity through a variety of activities including:

- **Delivering up to date Conservation Area Appraisals and Management Plans for Lochgilphead and Tarbert**
- **Working with partners to promote a World Heritage Site for Kilmartin Glen**
- **Working with partners to deliver outputs from the “Crinan Canal Charrette – Rethink the Link” that would benefit from inclusion in the development plan or its associated Action Programme. (See Monitoring Statement)**

**50 responses**

**45 agreed**

**5 disagreed**

#### **Agreement:**

- Conservation Area Appraisals and Management Plans for Lochgilphead and Tarbert: - assist with regeneration
- Support for promotion of Kilmartin Glen as World Heritage site
- Support for actions identified by Lochgilphead/Ardrishaig/Crinan Charrette

#### **Key Points Against:**

- Kilmartin Glen as a World Heritage Site - Cost, time, resource of KG WHS no evidenced benefit. May limit development. Other uses (quarry, commercial forestry) may render ineligible for status. Increased visitor pressure and associated development could damage the resource
- Conservation Areas - May negatively impact on potential future investment and developments

#### **PLDP response**

The LDP supports the delivery of Conservation Area Appraisals, regeneration of settlements including Lochgilphead, Ardrishaig and Tarbert and other actions to be set out in the Action Programme that will accompany the LDP.

### **MIR Question 19 – Flexibility in the Countryside**

**MIR Q19 – Do you agree with an expansion of the Rural Opportunities Area type approach to the non-designated countryside, essentially allowing some development in the countryside where it is**

**demonstrated to be of a suitable scale and fit with its environment and landscape and where there are no other precluding environmental designations?**

**87 responses**

**68 agreed**

**19 disagreed**

**Key Points Against:**

- Not all valuable countryside designated, e.g. native woodland
- Retain countryside and direct development to brownfield
- Not all ROA's have delivered housing
- Concern that small scale cumulative impacts could incrementally have serious effect on environment.
- Countryside development should only be permitted where there is a specific need, generally it's unsustainable and has negative impact on environment/wildlife habitat.

**Key Points For:**

- Organisations and individuals would like plan to liaise with them to identify sites.
- Suggests that presumption in favour of development should be extended to all zones but with more rigorous case to demonstrate minimal impact.
- In remote countryside people need to be able to earn a living support Band B, self-catering, craft workshops and other cottage industries as part of this type of tourism.
- Subject to the majority of locals agreement.
- Extend to include designated countryside also in recognition of economic and social development opportunities.

**PLDP response**

The LDP seeks to promote a more flexible approach to small scale development in the countryside by adopting a 'presumption in favour' of such development provided it demonstrates high quality, low carbon design, is sensitively located using the principles of Landscape and Visual Impact Assessment, and does not adversely impact on any nature or heritage assets.

## **MIR Question 20 – Delivering Carbon Reductions**

**MIR 20 – the preferred option is for the planning authority to ask for on-site renewable generation technologies in all new developments in order to facilitate the delivery of carbon savings. Do you agree with this approach?**

**91 responses**

**73 agreed**

**18 disagreed**

**Key Points Against:**

- Building Regs reducing carbon emissions, allows flexibility as to how standards are achieved
- Fabric First approach more efficient

- Concerns about cost implications
- Not all sites suitable for this type of technology
- Off site renewable generation may be more efficient (require less subsidy)

**Key Points For:**

- Support along with Fabric First approach (energy conservation)
- Concentrate on local district heating, solar panels and ground source
- Where practicable but not at expense of good otherwise sustainable developments
- Most carbon efficient method to be used?
- Provided on site renewables don't have adverse impact on biodiversity
- Local schemes should be encouraged

**PLDP response**

The current Scottish Buildings Standards do not require all new buildings to have such technologies. However, the LDP offers general policy support for carbon reduction.

**MIR Question 21 – Analysis**

**Delivering Carbon Reductions**

**MIR Q21 – Should we require the exploration of potential for energy generation or district heating schemes where development is proposed and there is evidence of waste heat demonstrated on Scottish Government heat maps, or new waste heat will be generated?**

**80 responses**

**68 agreed**

**12 disagreed**

**Key Points Against:**

- Concerns about scale required in order to get them to work, and costs.
- Also state that Building Control system has role to play.
- Fabric First approach to securing energy efficiency.

**Key Points to be addressed:**

Those which support the proposal where they have made comments are suggesting:

- Scale is important, and if not provided initially then we should explore future proofing potential for provision (eg safeguarding pipe network/routes).
- That the Council has a role to play by providing large anchor buildings such as schools or offices as part of any future network.
- Development should only be allowed where this has been explored and if not viable some other sort of renewable energy option should be included in the development.
- District Heating Schemes generally most suited to large scale strategic development, not appropriate for much of Argyll, should not be blanket requirement.

- Infrastructure associated with district heating schemes can be co-located with new green infrastructure to deliver a range of benefits.
- If heat networks not viable then microgeneration and heat recovery for individual properties should be encouraged.

#### **PLDP response**

Scottish Government advice (SPP) indicates that LDP's should employ heat mapping to identify existing sources of waste heat and those locations where new heat intensive development will be located in order to allow other co-located development to take advantage of the waste heat. This has proven to be difficult in Argyll and Bute due to the nature of our relatively small settlements and the lack of heat generating industrial/commercial operations and the comparatively small scale developments render this approach impractical and ineffective. Similarly there are significant constraints involved in retro-fitting schemes to existing heat emitters, e.g. distilleries.

## **MIR Question – 22 Special Built Environment Areas**

**Do you agree that the Special Built Environment Area (SBEA) designation should be removed from the LDP for the reasons set out above?**

**50 responses**

**38 agreed**

**12 disagreed**

#### **Key Points Against:**

- The removal of the SBEA designation appears to rest on the employment of a conservation/design officer.
- There is no design guidance available for the SBEA's.

#### **Key points to be addressed:**

- What role for the Conservation and Design officer when these designations are removed?
- Need for specific design guidance in the SBEA's?

#### **PLDP response**

The Special Built Environment designation has been removed from the LDP. The SBEA designation had no formal status beyond development plan policy and the distinction between the approach taken in Conservation Areas and SBEA's meant that there was no added value in continuing with this policy approach. The removal of this policy also helps with the objective of simplifying the plan. The Conservation and Design Officer is tasked with assisting in the improvement in outcomes relating to building design, alterations or adaptations across Argyll and Bute and not solely Conservation Areas and Listed Buildings.