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Which document(s) are you committing on?	Main Issues Report	<input checked="" type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan	<input type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

Your comments

Main Issue 16 – Using Resources in Buildings

This response form has been prepared by CHAP Group (Aberdeen) Ltd as part of the current consultation on the Aberdeenshire Main Issues Report (MIR) as part of the preparation process for the Aberdeenshire Local Development Plan 2021 (LDP). Other responses to the MIR have been submitted on behalf of CHAP Group (Aberdeen) Ltd or their trading division CHAP Homes in respect of other Main Issues. This particular response is in relation to our concerns with Main Issue 16 and specifically the preferred options.

CHAP does not believe that the LDP is the best vehicle to deal with energy and water efficiency in buildings as this matter is already dealt with through Building Regulations. Building Standards provides a more robust and adaptable framework to encourage CO2 reductions and promote energy efficiency which is more able to take into account the practical application of technological solutions.

Given that the fabric of a building is not an issue over which the planning system has control, planners as professionals may not have the necessary skills required to assess energy statements and other technical submissions which may be required at application stage. This, again, would be a matter for Building Standards and appropriately qualified chartered surveyors.

Accordingly, we are of the opinion that the LDP should not duplicate or go beyond the requirements set out by Building Standards. Having two separate requirements to adhere to is needlessly confusing, particularly with the preferred option to move towards the platinum standard which is over and above the current Building Regulation obligations. This is not an approach replicated in other authorities across Scotland currently. The latest Building Standards (2015) sets out cost-optimal levels of regulation for Section 7: Sustainability at Silver Active Level. Setting targets beyond this means going beyond a recognised limit of regulation (creating additional burdens on business) and furthermore duplicating a policy function addressed elsewhere in regulation.

What also has to be taken into account is that there is no clear definition of the platinum sustainability rating within the Scottish Government's technical handbooks. We therefore question whether creating a potentially open-ended policy obliging new homes and buildings to adhere to an as yet unknown standard can be in any way justified.

Whilst the platinum standard rating is currently undefined, there will certainly be considerable additional cost implications that would be associated in trying to achieve this rating. In most, if not all, cases this may result in development sites across the region as being unviable and therefore undeliverable. Accordingly, much needed new housing would not be provided in Aberdeenshire putting undue pressure on existing housing stock leading to an increase in house prices. Taking the known gold standard as a starting point, it is highly conceivable that a policy that insists on new buildings meeting a platinum standard rating could add in excess of **£50,000 per home** to the construction cost. Not only would this cost increase severely restrict the delivery of new "mainstream" housing in Aberdeenshire it would have dire consequences to the delivery of low cost housing in the region. Substantial subsidies would be necessary at local and/or national government level to ensure that affordable housing is delivered either as part of a larger development or as a sole affordable housing development.

CHAP is supportive of improving the sustainability and efficiency of new buildings. We are, however, strongly of the opinion that the preferred options would result in unnecessary uncertainty and risk for the industry, and would put Aberdeenshire at a serious disadvantage against other regions. Such an onerous policy would influence the investment strategy in respect of new development, which could lead to much need resources supporting local jobs and services being allocated elsewhere.

With reference to the foregoing comments, CHAP is not supportive of the two preferred options outlined under Main Issue 16 of the MIR. Our preference and recommendation is the second alternative option whereby substantial parts of the policy are deleted to revert to using only the Building Regulations to provide substance to paragraph 3F of the Climate Change (Scotland) Act 2009.