

## Archibald B (Brian)

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**From:** Archibald B (Brian)  
**Sent:** 26 May 2016 12:22  
**To:** Theresa.Hunt@burnesspaull.com  
**Cc:** Jennifer Bell  
**Subject:** FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2  
**Attachments:** PDF of Cults Development Co Ltd Response to Further Information Request 8.PDF

**Tracking:**

**Recipient**

**Delivery**

Theresa.Hunt@burnesspaull.com

Jennifer Bell

[REDACTED]

[REDACTED]

[REDACTED]

Hello Theresa

I acknowledge receipt of your response to FIR 08, this will be passed to the reporter.

Thanks  
Brian Archibald

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**From:** Theresa Hunt [mailto:Theresa.Hunt@burnesspaull.com]  
**Sent:** 25 May 2016 16:58  
**To:** Archibald B (Brian)  
**Cc:** Jennifer Bell  
**Subject:** ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear Mr Archibald

Further to your email below please find attached a response on behalf of our clients, Cults Development Ltd, in respect of the above further information request questions 1, 3 and 7.

Kindly acknowledge safe receipt.

Yours sincerely

*Theresa*

**Theresa Hunt**  
Senior Associate  
Burness Paull LLP

Direct Dial: +44 (0)1224 618538  
Mobile: +44 (0)7795 815539  
Email: [Theresa.Hunt@burnesspaull.com](mailto:Theresa.Hunt@burnesspaull.com)

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**From:** [Brian.Archibald@gov.scot](mailto:Brian.Archibald@gov.scot) [mailto:Brian.Archibald@gov.scot]  
**Sent:** 11 May 2016 15:56

**To:** [gary.purves@knightfrank.com](mailto:gary.purves@knightfrank.com); [ian.livingstone@ryden.co.uk](mailto:ian.livingstone@ryden.co.uk); [john.findlay@ryden.co.uk](mailto:john.findlay@ryden.co.uk); [sandy.hutchison@taqaglobal.com](mailto:sandy.hutchison@taqaglobal.com); [Meabhann.Crowe@colliers.com](mailto:Meabhann.Crowe@colliers.com); [christopher.ross@barratthomes.co.uk](mailto:christopher.ross@barratthomes.co.uk); [ewan@emacplanning.co.uk](mailto:ewan@emacplanning.co.uk); [planningscotland@gladman.co.uk](mailto:planningscotland@gladman.co.uk); [Christine.Dalziel@hfm.co.uk](mailto:Christine.Dalziel@hfm.co.uk); [info@aberdeencivicsociety.org.uk](mailto:info@aberdeencivicsociety.org.uk); [tim.reid@urbanwilderness.co.uk](mailto:tim.reid@urbanwilderness.co.uk); Theresa Hunt; [n.miller@homesforscotland.com](mailto:n.miller@homesforscotland.com); [planning@hfm.co.uk](mailto:planning@hfm.co.uk); [Emelda@emacplanning.co.uk](mailto:Emelda@emacplanning.co.uk); [dpope@nlpplanning.com](mailto:dpope@nlpplanning.com); [gary.purves@knightfrank.com](mailto:gary.purves@knightfrank.com); [bob.reid@hfm.co.uk](mailto:bob.reid@hfm.co.uk); [info@bancon.co.uk](mailto:info@bancon.co.uk); [robert.patrick@persimmonhomes.com](mailto:robert.patrick@persimmonhomes.com); [jain.mcgouldrick@persimmonhomes.com](mailto:jain.mcgouldrick@persimmonhomes.com)

**Cc:** [ABROWNRIIGG@aberdeencity.gov.uk](mailto:ABROWNRIIGG@aberdeencity.gov.uk); [DLaing@aberdeencity.gov.uk](mailto:DLaing@aberdeencity.gov.uk)

**Subject:** FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear All:

Please find attached Aberdeen Council's response to further information request 8 relating to the housing land supply. Some of this response (questions 2, 4, 5 and 6) comprises factual explanation based on existing information, and the reporter does not seek any further comment from parties on these questions. However the reporter is willing to accept any response parties may wish to make to what the council has said in relation to questions 1, 3 and 7. I would be grateful if responses could be sent to me to pass to the reporter by 5pm on 25 May 2016.

A copy of this request will be published on the DPEA website together with any responses you intend to submit.

<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=117092>

Please do not hesitate to contact me if there is anything you would like clarified.

Brian Archibald

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**From:** Archibald B (Brian)

**Sent:** 10 May 2016 16:06

**To:** Andrew Brownrigg ([ABROWNRIIGG@aberdeencity.gov.uk](mailto:ABROWNRIIGG@aberdeencity.gov.uk))

**Cc:** Donna Laing ([DLaing@aberdeencity.gov.uk](mailto:DLaing@aberdeencity.gov.uk))

**Subject:** FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Andrew

I acknowledge receipt of your response for FIR 08

Thanks

Brian

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**From:** Andrew Brownrigg [<mailto:ABROWNRIIGG@aberdeencity.gov.uk>]

**Sent:** 10 May 2016 15:12

**To:** Archibald B (Brian)

**Cc:** Donna Laing

**Subject:** ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Brian

Please find our response to Further Information Request 8 on Issue 2. I have arranged the responses underneath the individual elements of the request which are highlighted in **bold**.

**Information requested**

- 1. In considering the balance between large sites and small sites in the housing land supply, it might be useful to consider the situation across the Aberdeen housing market area as well as in Aberdeen city in isolation. The council is requested to supply a table showing the numbers of houses proposed on allocated sites of over 500 units, of between 100 and 500 units, and of under 100 units in the (a) Aberdeen City and (b) Aberdeenshire portions of the Aberdeen housing market area, and (c) across the housing market area as a whole.**

Response

We have attached the tables as requested. However, it should be noted that many of the brownfield sites in Aberdeen do not have an actual number of units allocated to them – only if there has been consents have we stated numbers for individual sites. We have therefore shown a separate table of brownfield sites showing the OP reference, name and size. It is likely that most of these sites will be for under 100 units. Likely exceptions (because of their large size) are;

- OP13 AECC Bridge of Don
- OP105 Kincorth Academy
- OP77 Cornhill Hospital (consent now granted for 323 units - after publication of the Proposed Plan)
- OP93 Former Summerhill Academy

We have also produced a separate table of those sites carried over from the 2008 Local Plan as these do not count towards the SDP housing requirement (see also Question 6).

When considering the issue of site size, it also needs to be recognised that larger sites are often subdivided into smaller sites for individual builders. Indeed, the two largest sites (accounting for over 11,000 homes) are owned and managed by development companies rather than house builders (Elsick Development Company in Aberdeenshire and the Grandhome Trust in Aberdeen). By their very nature they will be relying on different builders to take on different phases of development. Although using a more traditional model, the third largest site (Countesswells with 3,000 homes) has also recently announced the sale of the first areas of land to other builders.

This further information request relates to houses proposed on allocated sites. It should also be noted that a broader picture of all sites will be provided in the full Established Land Supply as set out in Appendix 2 of the 2015 Housing Land Audit.

- 2. It is assumed that the housing requirement for the Aberdeen housing market area shown in figure 13 of the housing land audit 2015 is derived in some way from figure 10 of the strategic development plan. The council is asked to explain how the housing requirement for the Aberdeen housing market area in figure 13 of the housing land audit 2015 is calculated.**

Response

Yes – Figure 10 of the 2014 SDP is the source of the housing requirement. The requirement changes over the SDP periods, so the 2015 Housing Land Audit works out the requirement for the period 2015-19 by taking the average annual requirements for the two periods (2011-16 and 2017-26) and adding them together. The average annual requirement for 2011-16 is 1660.83 units and for 2017-26, the average annual requirement is 1501.7 units. Thus  $(1660.83 \times 2) + (1501.7 \times 3) = 7827$  for the period 2015 to 2019.

**3. Is it possible to derive a housing requirement for Aberdeen City alone, as envisaged by paragraph 118 of Scottish Planning Policy (accepting that Scottish Planning Policy envisages this as a role for the strategic development plan)?**

Response

No, it is not possible to derive a housing requirement (housing supply target under SPP 2014 terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA). There is a housing land requirement effectively contained in Schedule 1 of the SDP, but not a housing requirement because the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

The Aberdeen City and Shire SDP was approved by Scottish Ministers in March 2014, prior to the publication of SPP in June 2014. There was no requirement in the earlier version of SPP to provide the housing requirement at the council area level. Guidance at that time (and to a large extent still does) focused on planning for housing at the Housing Market Area level. We note SPP now requires the housing supply target to be set at the council area level in addition to housing market area and this will be reflected in the next Strategic Development Plan

SPP is unhelpful in being silent on the matter of which housing supply target should be used to determine the adequacy of the housing land supply but, in order to be consistent with the SDP, it is clear that for the plan currently being examined it is at the HMA level.

**4. Are the sites listed in appendix 1 table 2 of the proposed plan all either already built, effective or expected to become effective in the plan period?**

Response

All of the sites in Appendix 1 Table 2 have had consents since 2011. Many of them are already built out or are under construction or considered effective. The following sites are however, regarded as non-effective in the 2015 Housing Land Audit; Balgownie Centre (OP5) and Pittodrie Stadium (OP87). Both are regarded as having ownership constraints. The 2015 HLA indicates that both sites have planning consents and both are included as opportunity sites in the Proposed Plan. OP87 is dependent on a new stadium being built with a new stadium having planning consent (at OP59 Loirston) on page 87 of the Proposed Plan.

**5. Paragraph 2.12 of the proposed plan identifies sources for between 5,398 and 7,287 potential units on brownfield sites in the plan period. Does this take account of the potential product of the brownfield opportunity sites identified in appendix 2 and on the proposals map?**

Response

Yes.

**If not, how many units may these sites be expected to deliver by 2026? Have these sites been accounted for elsewhere in the council's housing land calculations that are before the examination?**

Response

No – we have been very careful to avoid double counting. Firstly, any sites that were considered effective in the 2011 Housing Land Audit have not been counted towards any of the SDP requirements (brownfield or greenfield) for this Plan – see also Question 6 below in respect of the greenfield sites. Neither have we double counted the figures from sites in Appendix 1 with any of the brownfield opportunity sites identified in Appendix 2. Where a consent has been granted (those sites identified in Appendix 1 Table 2) we have used that figure. Otherwise we use the range of calculations derived from the Brownfield Potential Study, but only apply them once to each site, whether they be in Appendix 1 Table 1 or Appendix 2 of the Proposed Plan, or both.

We have attached a copy of the 2011 Housing Land Audit for information. Appendix 2 contains a detailed table of the established, constrained and effective land supply 2011 for Aberdeen City. I can send a hard copy of this section by post.

**6. Paragraph 8 of the council’s response as set out in the schedule 4 form indicates that sites remaining from the Aberdeen Local Plan 2008 (such as OP41 Friarsfield and OP58 Stationfields) have not been counted towards the SDP allowances. Is it the case that the product of such sites will have been accounted for under the effective or constrained land supply columns of schedule 1 of the strategic development plan?**

Response

Yes. The following greenfield sites have been carried over from the 2008 Local Plan. The figures in brackets show their status in the 2011 Housing Land Audit and therefore the number of units from each site that were included in the effective and constrained land supply columns in Schedule 1 of the SDP;

- OP28 Greenferns (120 houses constrained in the 2011 HLA)
- OP56 Cove (687 houses effective in 2011 HLA)
- OP58 Stationfields (150 houses effective in 2011 HLA)
- OP41 Friarsfield (280 houses effective in 2011 HLA)

None of the figures relating to these sites have been used to meet the housing allowances of the 2014 SDP. This is despite the fact that additional consents since 2011 at OP56 has increased the total capacity of the site by 122 units to 809 (see entries for Wellington Road, Cove Bay and Cove West in the 2015 HLA).

**7. How should the second column of tables 3 to 8 in the proposed plan be interpreted? Should this actually refer to ‘Existing to 2016’ and so be consistent with table 2?**

Response

Yes it should be ‘Existing to 2016’ – ‘Existing to 2026’ is an error which has been repeated from Tables 3 to 8. We would be grateful if the Reporters could rectify this.

**Is this column a record of the assumptions made in the adopted local development plan (and hence in column 5 of schedule 1 of the strategic development plan) as to the land that would be made available by 2016?**

Response

Yes. They are the same greenfield sites and numbers as those identified in Tables 5 to 10 of the 2012 Local Development Plan under the column 2007-2016. These represent the 'Existing LDP allowances to 2016' column identified in Schedule 1 of the SDP.

**Can the figures in columns 2, 3 and 4 of these tables be added together to give the total capacity for each site?**

Response

Yes. We would be happy to have a further column added to the tables if the Reporters considered it useful.

If any further information is required then please get in touch.

Regards, Andy

Andrew Brownrigg  
Team Leader (Development Plan)  
Communities, Housing and Infrastructure  
Aberdeen City Council  
Business Hub 4 Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

Email [abrownrigg@aberdeencity.gov.uk](mailto:abrownrigg@aberdeencity.gov.uk)  
Direct Dial 01224 523317

Switchboard 03000 200 292  
Website [www.aberdeencity.gov.uk/localdevelopmentplan](http://www.aberdeencity.gov.uk/localdevelopmentplan)

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlÃ radh neo air a sgrÃ¹dadh airson dearbhadh gu bheil an siostam ag obair gu h-Ã"ifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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Aberdeen Edinburgh Glasgow

**Burness Paull LLP**  
 Union Plaza, 1 Union Wynd, Aberdeen AB10 1DQ T +44 (0)1224 621621 F +44 (0)1224 627437  
 50 Lothian Road, Festival Square, Edinburgh EH3 9WJ T +44 (0)131 473 6000 F +44 (0)131 473 6006  
 120 Bothwell Street, Glasgow G2 7JL T +44 (0)141 248 4933 F +44 (0)141 204 1601  
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## **PROPOSED ABERDEEN LOCAL DEVELOPMENT PLAN 2015**

### **Further Information Request 8**

#### **Issue 2 – Housing Land Supply and Policy LR1 and LR2**

#### **Cults Property Development Company Ltd – Land at Station Road, Pitfodels, Aberdeen**

#### **Information requested**

##### Question 1

*“In considering the balance between large sites and small sites in the housing land supply, it might be useful to consider the situation across the Aberdeen housing market area as well as in Aberdeen city in isolation. The council is requested to supply a table showing the numbers of houses proposed on allocated sites of over 500 units, of between 100 and 500 units, and of under 100 units in the (a) Aberdeen City and (b) Aberdeenshire portions of the Aberdeen housing market area, and (c) across the housing market area as a whole.”*

##### CPDCL Response

The information put forward by the Council in answer to this question is acknowledged, however it is not in the format requested by the Reporter. Please see further explanation at Question 3 below.

It is noticeable that 19,807 units out of a total of 22,324 units are to come forward from 11 sites which are all over 500 units. These sites require considerable infrastructure. There is no detail on who will provide it or when. Greenferns has been allocated since 2008 yet has failed to come forward so there can be no confidence that it will deliver the number of units which are identified within the Plan period. These issues are already covered in our response to the LDP (reference 142) and we would refer the Reporter to our client’s representation for further detail.

It should also be noted that since submission of the LDP representations last year, the Council has issued the “*Aberdeen Access from the South – Bridge of Dee Study*”. During May 2016 the Council is holding public consultation events on what is seen as a “key” project to investigate capacity issues and potential opportunities relating to the existing transport network in the Bridge of Dee area of Aberdeen. A number of options have been identified, one of which is Concept 6b “*link road through from Garthdee to North Deeside Road*”. The link road is part of the Council’s Strategic Infrastructure Plan (SIP).

The LDP should have regard to sites which will be opened up for development as part of this Study. Our client has included the link road within their proposed development at Inchgarth. It fits with the SIP and should be allocated for development in the LDP. To do otherwise would render the Plan out of date on its adoption.

### Question 3

*“Is it possible to derive a housing requirement for Aberdeen City alone, as envisaged by paragraph 118 of Scottish Planning Policy (accepting that Scottish Planning Policy envisages this as a role for the strategic development plan)?”*

### CPDCL Response

We disagree with the Council’s response to this question.

The Council makes the point that Scottish Planning Policy 2014 (SPP) post dates the approval of the SDP and that as a consequence the new terminology of housing supply target cannot be used. The Council’s position seems to be that the housing supply target at a Council area level will be reflected in the next SDP. The Local Development Plan requires to be up to date and should take into account the latest Scottish Government guidance whether or not it is reflected in the adopted SDP.

Paragraph 115 of SPP makes it clear that the housing supply target is a “*policy view*” of the number of homes the Authority has agreed will be delivered in each housing market area over the periods of the Development Plan and Local Housing Strategy, taking into account wider economic or social and environmental factors, issues of capacity, resource and deliverability and other important requirements such as the aims of National Parks. The target is to be reasonable, properly reflect the HNDA estimate of housing demand in the market sector and supported by compelling evidence. The Authority’s housing supply target is also be reflected in the Local Housing Strategy. These are all pointers as to how a housing target can be determined and therefore considered to meet any SDP requirement.

SPP advises that if a Development Plan fails to provide an effective housing land supply, then it will not be considered to be up to date and paragraphs 32-25 apply, which gives primacy to SPP and the presumption in favour of development that contributes to sustainable development. Thus the Council cannot get away from the terms of SPP.

Given the Council’s acknowledgment that the phrase “*housing supply target*” is simply a change in terminology, it is submitted that a housing requirement for Aberdeen City alone can be derived.

The Council’s response to Question 1 was that all site information is contained within the 2015 Housing Land Audit. The Housing Land Audit is produced by Aberdeen City Council and Aberdeenshire Councils. This contains the effective, constrained and established supply of housing across the City and the Shire. It is also divided in the two housing market areas. It is understood that the SDP requirement was based on the Housing Land Audit carried out in 2011. It will have considered the land available in the City and the Shire and the forecast population growth before determining the requirement for housing going forward.

The Audit is then used to check whether the sites which are to meet the requirement are indeed coming forward and so it must be possible to ascertain the requirement at a City level.

Question 7

*1) “How should the second column of tables 3 to 8 in the proposed plan be interpreted? Should this actually refer to ‘Existing to 2016’ and so be consistent with table 2?”*

CPDCL Response

Noted. Our client agrees with the explanation from the Council as to the error that has been replicated in Tables 3-8.