

Archibald B (Brian)

From: Archibald B (Brian)
Sent: 03 June 2016 10:43
To: 'N.Miller@homesforscotland.com'
Subject: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2
Attachments: Homes for Scotland - Aberdeen City FIR 08 FINAL - 31 May 2016.pdf

Tracking:	Recipient	Delivery
	'N.Miller@homesforscotland.com'	
	[REDACTED]	
	[REDACTED]	[REDACTED]

Hello Nicola

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

Thanks
Brian

From: Nikola Miller [mailto:N.Miller@homesforscotland.com]
Sent: 31 May 2016 12:05
To: Archibald B (Brian)
Subject: RE: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear Brian,

With regard to the Aberdeen Local Development Plan Further Information Request 08 – Issue 02 – Housing Land Supply and Policy LR1 and LR2, please see attached the Homes for Scotland response to Questions 1, 3 and 7 as requested.

Please let me know if you require any further information from us,

Kind regards

Nikola

Nikola Miller
Principal Planning Advisor
Homes for Scotland

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*In order to tackle Scotland's housing crisis and ensure that we have **enough homes of all tenures in the right locations** to properly house our growing population, Homes for Scotland is calling for at least 100,000 new homes by the end of the next Scottish Parliament. Click [here](#) to read our manifesto in full or visit www.homesforscotland.com for up to date market commentary.*

From: Brian.Archibald@gov.scot [<mailto:Brian.Archibald@gov.scot>]

Sent: 11 May 2016 15:56

To: gary.purves@knightfrank.com; ian.livingstone@ryden.co.uk; john.findlay@ryden.co.uk; sandy.hutchison@taqaglobal.com; Meabhann.Crowe@colliers.com; christopher.ross@barratthomes.co.uk; ewan@emacplanning.co.uk; planningscotland@gladman.co.uk; Christine.Dalziel@hfm.co.uk; info@aberdeencivicsociety.org.uk; tim.reid@urbanwilderness.co.uk; Theresa.Hunt@burnesspaull.com; Nikola Miller; planning@hfm.co.uk; Emelda@emacplanning.co.uk; dpope@nlplanning.com; gary.purves@knightfrank.com; bob.reid@hfm.co.uk; info@bancon.co.uk; robert.patrick@persimmonhomes.com; jain.mcgouldrick@persimmonhomes.com

Cc: ABROWNRIIGG@aberdeencity.gov.uk; 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

From: Archibald B (Brian)

Sent: 10 May 2016 16:06

To: Andrew Brownrigg (ABROWNRIIGG@aberdeencity.gov.uk)

Cc: Donna Laing (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

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

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Examination of Aberdeen City Proposed Local Development Plan

Homes for Scotland response to Aberdeen City Council Response to Further Information Request 08 – Issue 02 – Housing Land Supply and Policy LR1 & LR2

Introduction

- 1 Thank you for providing Homes for Scotland with an opportunity to respond to Aberdeen City Council's response to Further Information Request 08 in relation to questions 1, 3 and 7.

Question 1

- 2 Homes for Scotland considers that the planning system must be proactive, not reactive, and that Local Development Plans (LDPs) are an opportunity to deliver land for development, as well as plan for growth. The LDP must not only allocate sufficient land for new homes, but also positively enable the delivery of these homes. Therefore we would support the allocation of a generous supply of land within the Aberdeen Housing Market Area (AHMA) to ensure that enough land (of a range of site sizes) can be brought forward if other sites are failing to deliver the anticipated number of homes within the plan period. This would better maintain the required five-year housing land supply at all times, and better deliver homes that are needed across Aberdeen.
- 3 While the tables provided by Aberdeen City Council provide detail for both Aberdeen City and Aberdeenshire sections of the AHMA, the important point to consider is the delivery of these homes. Information on the number of units delivered on each site to date would be useful to show the rate of delivery of homes, not just the overall numbers and capacities.
- 4 Homes for Scotland queries the proposed rate of delivery of the largest sites – Grandhome in Aberdeen City and Chapelton in Aberdeenshire. The Council response acknowledges that these sites account for over 11,000 homes within the AHMA and are owned and managed by development companies rather than house builders. We consider that delivery on these sites will be slowed by the collaboration required between the land owner and home builders to deliver the necessary infrastructure and deliver homes on site. If the rate of delivery on these largest sites slows, there could be a significant shortfall in delivery over the Plan period, without enough of a range of other sites of varying sizes also allocated across both the Aberdeen and Aberdeenshire portions of the AHMA. Paragraph 119 of Scottish Planning Policy (SPP) states "*in allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the*

range of sites allocated will enable the housing supply target to be met". Homes for Scotland considers that more land should be allocated for housing within Aberdeen City, and that this land allows for a balance in size of sites across the AHMA.

Question 3

- 5 Aberdeen City and Shire Strategic Development Plan (SDP) 2014 does not set out a housing requirement (or housing supply target) for Aberdeenshire for the three periods of 2011-2016, 2017-2026 and 2027-2035. The SDP sets out the housing requirement in Figure 10, page 32 for the plan area as a whole, and also for the two housing market areas (HMA) covered by the plan – the Aberdeen HMA and the Rural HMA.
- 6 We understand that the Aberdeen City and Shire SDP was approved prior to the publication of Scottish Planning Policy (SPP) in 2014, and therefore was not subject to the requirements of Paragraph 118 of SPP which indicated that the SDP should set out the housing supply target and housing land requirement for the plan area, each local authority area, and each functional market area. The next SDP will be required to set the housing requirement at the whole plan level, for each local authority level, and for each housing market area within the Plan.
- 7 However, in order to determine the proportion of housing land that is required to be allocated within the Aberdeen City Council area of the Aberdeen HMA, a breakdown of housing requirement by local authority is necessary.
- 8 This is also needed for the purpose of monitoring the effective housing land supply, the planning authority's compliance with SPP paragraphs 110 and 119, and to enable the operation of the presumption in favour of development that contributes towards sustainable development as set out in SPP.
- 9 It is possible to estimate the split of the Aberdeen HMA by using information provided within the SDP. Schedule 1, Page 42 of the SDP sets out the break-down of the Housing Allowance for both the Aberdeen HMA and the Rural HMA. It also details Aberdeen City and Aberdeenshire figures. From this information it is therefore possible to determine the Housing Allowances for each planning authority area over the three time periods and in total:

Aberdeen City:

- *Existing LDP (allowances to 2016) = 16,500 units*
- *2017 – 2035 = 8,000*
- *2027 – 2035 = 7,000*
- *TOTAL = 31,500 (all within the Aberdeen HMA)*

- 10 We understand that the Housing Allowance has an element of generosity built in, and is therefore more of an equivalent to the Housing Land Requirement, however these figures would be reasonable estimates to work from.

Question 7

- 11 We agree with both the Reporter and Aberdeen City Council that Tables 3 to 8 of the Proposed LDP should refer to 'Existing to 2016' rather than 'Existing to 2026' as stated in the Proposed Plan. We also agree that it would be useful to have the figures in Columns 2, 3 and 4 of these tables added together to give the total capacity for each site.
- 12 There is an issue with the number of homes set out within the "existing to 2016" column of Tables 3-8 of the Proposed LDP when measured against projected completions within the published Aberdeen City and Aberdeenshire Housing Land Audit 2015. SPP states in Paragraph 119 that Local Development Plans should "provide for a minimum of 5 years effective land supply at all times". Therefore sites allocated within the LDP must be capable of being delivered within the plan period. Table 2 of the Proposed LDP shows that there is a shortfall in the total greenfield development allocations when compared to the SDP Allowances. If not all of the homes allocated under "Existing to 2016", or any of the other columns, are capable of being brought forward in the plan period due to constraints (as highlighted in the published 2015 Housing Land Audit) then this shortfall will be increased significantly.
- 13 This highlights an issue with the deliverability of sites within the Proposed LDP, and therefore Homes for Scotland argues that additional effective sites should be allocated to ensure that there is not a shortfall in delivery of homes across Aberdeen City, over the Plan period.