

Archibald B (Brian)

From: Archibald B (Brian)
Sent: 19 May 2016 09:17
To: 'tim.reid@urbanwilderness.co.uk'
Subject: RE: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

| Tracking: | Recipient | Delivery |
|-----------|------------------------------------|------------|
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Hello Tim

I acknowledge receipt of your response regarding the councils comments to FIR 08

Thanks
Brian

From: tim.reid@urbanwilderness.co.uk [mailto:tim.reid@urbanwilderness.co.uk]
Sent: 18 May 2016 18:43
To: Archibald B (Brian)
Subject: RE: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Brian

Thank you for providing us with a further opportunity to comment on the Council's responses below.

I would indeed like to comment further on Questions 1, 3 & 7 as you suggest.

Question 1

It appears from the Council's FIR08 Housing Numbers spreadsheet that there is an over-reliance on large allocations coming forward in an efficient, timely manner. There are often significant problems with bringing forward large sites as they often fall into the Schedule 2 Development bracket, thus invoking lengthy Environmental Impact Assessment. Also there are commercial considerations, where as alluded to in the Council's response, portions of land often get sold on to third parties for separate development due to resource constraints.

In terms of statistics, the council is currently allowing for only 4.9% of their total housing requirement to come from sites of under 100 and 16.4% for sites between 100 and 500 units. The remaining 78.7% is for larger 500-unit schemes. This places too large a burden on the super-sites coming forward quickly to meet the current and anticipated housing demand.

Finally, the sub-100 unit sites also include brownfield sites. These are notoriously difficult to bring forward due to the complexities involved in mitigating contaminated land, offsite disposal costs, specialist landfill requirements (such as asbestos, Japanese knotweed, etc) and planning related problems such as landscape character, transport infrastructure connectivity, public open green space connections, etc. So even the sub-100 sites percentage of 4.9% looks unrealistic.

Question 3

This rather defensive position from the Council does make sense in terms of government guidance, but it also implies that a forward-looking, proactive strategy is not required simply because Scottish Planning Policy is silent on the matter. If Aberdeen and Shire Councils are to make a substantial, meaningful dent in the current housing shortage, they need to adopt a more proactive approach.

Question 7

With the amendments to Tables 3-8 agreed by the Council, and including the figures in Table 2, it is anticipated that 23,668 new houses will have been completed by the end of 2016. I do not know what the actual figures of completed units are within the area. However, to take the OP38 Countesswells development as a case in point, and of direct relevance to our own site at Thornhill, Table 6 shows the anticipated completed units as 2,150. It is clear that the actual number of completed new houses on the ground by the end of this year will fall well short of this number.

So this aspect of unrealised ambition indicates that the delivery times for the large sites are unrealistic; that concerns over deliverability of the larger sites is well-founded; and that insufficient emphasis has been put on the usefulness of smaller sites in meeting the two Councils' housing objectives, resulting in inadequate allocations within the Proposed Local Plan. I therefore suggest that the allocations associated with smaller sites are revisited and their contribution to the overall housing numbers increased.

Summary

I trust this feedback is useful and goes some way in helping the two councils understand the tangible benefits of bringing a larger number of smaller sites forward as part of this iteration of the Local Plan.

I would be pleased to discuss any element of the above should you have any questions or require clarification on any of the points raised.

Best wishes

Tim Reid
Director



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-----Original Message-----

From: Brian.Archibald@gov.scot

Sent: Wednesday, May 11, 2016 10:56am

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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 (ABROWNRI GG@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:ABROWNRI GG@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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