

Archibald B (Brian)

From: Archibald B (Brian)
Sent: 26 May 2016 12:07
To: 'claire.coutts@ryden.co.uk'
Cc: Marianne Evans
Subject: FW: Aberdeen Local Development Plan - Further Information Request 08 - Issue 02 - Housing Land Supply and Policy LR1 & LR2
Attachments: Response to Council's comment HLS - 25 May 2016.docx

Tracking:	Recipient	Delivery
	'claire.coutts@ryden.co.uk'	
	Marianne Evans	
	[REDACTED]	
	[REDACTED]	[REDACTED]

Hello Claire

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

Thanks
Brian Archibald

From: Claire Coutts [mailto:claire.coutts@ryden.co.uk]
Sent: 25 May 2016 10:12
To: Archibald B (Brian)
Cc: Marianne Evans
Subject: Aberdeen Local Development Plan - Further Information Request 08 - Issue 02 - Housing Land Supply and Policy LR1 & LR2

Brian

I refer to your email dated 11 May 2016 inviting comments on Aberdeen City Council's response to the above further information request, in relation to the housing land supply.

On behalf of Stewart Milne Homes, please find attached our response to the Council's comments. This should be read in conjunction with previous submissions made on their behalf and also in conjunction with Homes for Scotland's response on this issue.

I trust that this is acceptable, however, please do not hesitate to contact me should you need anything further.

Kind regards
Claire

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Claire Coutts BLE (Hons) MRTPI
Associate (Consulting)
25 Albyn Place
Aberdeen
AB10 1YL



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**Aberdeen Local Development Plan
Further Information Request 08
Issue 2 – Housing Land Supply and Policy LR1 and LR2**

Aberdeen City Council provided their response to the Reporter's request for information on 11th May 2016. The Reporter is willing to accept responses from interested parties to questions 1, 3 and 7.

Our client, Stewart Milne Homes have an interest in land at Abbotswell Road, Contlaw (Bid Ref B0915 and B0946), Kingswells (Bid Ref. B0303) and Mundurno (Bid Ref. B0202), which have been promoted through the LDP process (Proposed Plan Representation Ref. 64, 85 and 117). This response should be read in conjunction with those previous submissions.

Stewart Milne Homes are members of Homes for Scotland and these comments should also be read in conjunction with their response.

Question 1

Question 1 considers the balance between large and small sites in the housing land supply and the Council were requested to provide a table showing the numbers of houses proposed on all allocated sites of over 500 houses; between 100 and 500 units; and, under 100 units. These were to be provided for sites in Aberdeen City, the Aberdeenshire portion of the Aberdeen HMA and across the housing market area as a whole. Aberdeen City Council provided the table showing sites over 500 units; between 100 and 500 units; and, under 100 units. However, these were sites in Aberdeen City only. They also provided a table of brownfield sites and those sites carried over from the 2008 Local Plan.

Much of the additional information request focuses on the location of sites and making a distinction between sites in Aberdeen City, the Aberdeenshire part of the Aberdeen HMA. Regardless of the location of these sites, there remains a shortfall in allocations when considered against the Strategic Development Plan allowances. Table 2 of the Proposed Plan highlights this shortfall, totalling 578 units in the period 2016-2035.

It should be emphasised that the Housing requirements set out in the SDP were based upon depressed population and household projections. More recent projections (issued by National Records for Scotland in 2014) indicated that the anticipated population growth to 2035 was seriously underestimated and therefore, the SDP also underestimated the housing requirement over that period.

This is compounded by an analysis of the 2015 Housing Land Audit found that of the 11,834 units identified for development in the period 2007 – 2016, only 1,418 were expected to be completed. This accounts for only 12% of the required number of houses required to be delivered. Stewart Milne Homes therefore have serious reservations regarding the Housing Land Supply and its failure to deliver the required number of houses in the LDP period. As a result, the Plan fails to meet the requirements of the approved Strategic Development Plan and Scottish Planning Policy.

The combination of the underestimated projections, the shortfall in allocations and fewer than anticipated completions, demonstrates the need to identify additional sites in the 2016 LDP, which are capable of early delivery. SPP requires plans to indicate the number of new homes to be built over the plan period and increase it **“by a margin in 10 to 20%”** in order to ensure that a generous supply of land for housing is provided. Taking the 578 shortfall identified in Table 2 and introducing a 20% margin, means an additional requirement for 4,778 units. This scale is considered necessary to

provide the required generosity, to increase the range and choice of opportunities and to create a pipeline of effective housing sites to increase overall volumes, to compensate for those sites which cannot be delivered during the Plan period.

Aberdeen City Council, in their response to Question 1, also highlight that the two largest sites, accounting for over 11,000 homes are owned and managed by development companies rather than housebuilders. These sites, by their nature, have significant infrastructure costs and will involve joint working between land owners and developers to enable their development, all of which will slow down the delivery process. The scale of these large sites means that Phase 2 sites (2027 – 2035) are continuations of Phase 1 sites (2017 – 2026) resulting in a lack of opportunity to draw down other smaller, Phase 2 sites if there is a shortfall in housing land supply.

It is therefore argued that the 2016 LDP should, not only introduce additional sites, but ensure a more balanced mix of sites. The emphasis should be placed on the allocation of smaller sites, or those under the control of a housebuilder. The land at Contlaw, Kingswells and Mundurno provide a range of size of sites, which are under the control of a housebuilder and are therefore capable of delivery. As such, they should be allocated for development in the 2016 LDP.

Question 3

Aberdeen City Council were asked whether it was possible to derive a housing requirement for Aberdeen City alone. Their response was that it was not possible to derive a housing supply target (SPP terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA), as the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

One of the core values of SPP is for Development Plans to be up to date and relevant (Paragraph 4). Aberdeen City Council note that SPP now requires the housing supply target to be set at the Council area level in addition to the housing market area and they state that this will be reflected in the next Strategic Development Plan.

However, it is argued that there is an opportunity for the Local Development Plan to provide this information now, which would provide a direct comparison with Schedule 1 in the Strategic Development Plan. It is especially important that an authority level is brought forward as the Local Development Plans are prepared at differing rates and the subject of separate examinations. There is, therefore, a need to know the figure for each plan to ensure the proper interrogation of the Housing Land Supply. Aberdeen City Council and Aberdeenshire Council should work together with the Strategic Development Planning Authority to provide this information to ensure the LDP is up to date and compliant with SPP.

Question 5

Although parties have not been asked to provide comments to the Council's response to Question 5, Stewart Milne Homes seek clarification from the Reporter as to the range of calculations referred to.

Question 7

Aberdeen City Council confirm that the second column of Tables 3 to 8 are a record of the assumptions made in the adopted Local Development Plan as to the land that would be made available by 2016.

SPP focuses on the delivery of sustainable development and in particular, the delivery of housing in specified Plan periods. Paragraph 115 advises that the housing supply target is a policy view of the

number of homes the authority has agreed with be **delivered** in each Housing Market Area over the periods of the Development Plan and Local Housing Strategy. Paragraph 116 requires that Plans should indicate the number of homes to be **built** over the Plan period and in allocating sites Planning Authorities should be confident that land can be brought forward for development within the Plan period and the range of sites allocated will enable the Housing Supply Target to be met.

In relation to Table 3: Development at Bridge of Don & Grandholme, 3210 homes are existing to 2016 (as amended). The analysis of the 2015 Housing Land Audit found that only 490 of these were expected to be built. This amounts to only 15% of the required number of houses, or a shortfall of 2720 houses. In table 5: Development at Kingswells & Greenferns, 1520 homes are existing to 2016, with only 209 expected to be built. This amounts to 14% of the requirement or a shortfall of 1311 homes. Finally Table 8: Deeside identifies 554 homes existing to 2016. However, only 166 are expected to be completed. This amounts to only 30% of the requirement, or a shortfall of 388 homes. This is before the household projections were amended and not taking account of the requirement for a 20% margin to be applied.

Planning authorities must ensure sites can be delivered and if that cannot be achieved, which is clearly the case across these three areas, additional sites must be allocated. This is essential to ensure that there are no difficulties in delivering housing later in the Plan period.

Again, it is argued that there is a clear need to identify additional sites in the 2016 LDP which are capable of early delivery in order to meet the SDP requirements. The land at Contlaw, Kingswells and Mundurno are under the control of a developer and have no major impediments to their delivery. As such, they should be allocated in the 2016 LDP to ensure an adequate supply of houses is maintained across the region.