



aberdeen local development plan

**RESPONSE TO PROPOSED PLAN
CONSULTATION:
LOCAL DEVELOPMENT PLAN VISION AND
STRATEGY**

ISSUE 1 - 2

Issue 1	VISION AND GENERAL SPATIAL STRATEGY	
Development plan reference:	Page 3-7	Reporter:
Body or person(s) submitting a representation raising the issue (reference no.):		
<p>Mr Ken Hutcheson (9) Mr George Wood of Old Aberdeen Community Council (100) Mr Peter Roberts of Cults, Bieldside & Milltimber Community Council (102) Mr Alan Strachan of Nigg Community Council (111) Mr Mike Williams of c/o Scott Hobbs Planning on behalf of Scottish Enterprise (120) Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123) Mrs Claire Coutts of Ryden LLP on behalf of NHS Grampian (148) Mr Oliver Munden of Persimmon Homes (157)</p>		
Provision of the Development Plan to which the issue relates:	The first two chapters of the Proposed Plan set out the Vision and Spatial Strategy for development over the lifetime of the Plan.	
Planning authority's summary of the representation(s):		
<p>Phasing and Infrastructure</p> <p>9: Detailed phasing of developments is required to ensure the infrastructure is developed to match the development of housing</p> <p>111: Whilst accepting in principle, and supporting the objectives of the Proposed Plan, respondent is of the opinion that many of the suggested proposals intimated as being required to encourage the economic and financial growth of Aberdeen City and North East should be suspended until existing infrastructure problems are resolved.</p> <p>148: Generally supportive of the Spatial Strategy but want to emphasise the importance that adequate provision is made for healthcare facilities to serve new development. Existing facilities are already pressurised and incapable of catering for new development.</p> <p>New Employment Land</p> <p>120: In order to achieve the full potential of the area around the new harbour expansion, new employment land allocations require consideration.</p> <p>General Comments</p> <p>100: The aims of the Plan are ideal however the means of delivery are not clear and succinct. We would wish to see all of the Aims in Section 1 delivered within the</p>		

timescale of the Plan.

Define what is meant by "Housing allowances" in Section 1.9. Are these houses, flats, beds etc?

Section 2.1 promotes the city centre as the commercial, economic, social, civic and cultural heart of Aberdeen but all of the major commercial and economic developments are peripheral to the city centre and essentials such as transport transfer hubs and traffic circulation are not being fully addressed.

Section 2.5 states that "New developments will have to be of the best standard". This is highly desirable and it has sadly been neglected in current developments. All public developments should be subject to a design competition to ensure that they are of a high standard and show leadership which will encourage the commercial market to follow suit.

Section 2.9 People will not choose residential location simply on it's proximity to their place of work. Effective alternatives to car travel must therefore be delivered in the form of public road transport, rail links and dedicated cycle routes.

102: Agree with the position of no further large scale development along Deeside.

Table 8 is missing OP41 Friarsfield which is still under development.

A local landowner has submitted a proposal to include land at Brookfield/Murtle Den. As long as the approval was conditional for the land to be only used for housing for over 50's we would have no objections.

120: The Proposed Plan reflects well the current NPF3 and SPP status and requirements particularly with regard to the ambition of the plan in relation to place.

There is no Spatial Strategy Plan. A clear visual representation of the overall intentions would be welcomed.

The Plan could also show areas which have a regional significance for development, and an overlap between the City and Shire boundaries - for example Energetica and other growth areas and settlements which are bisected by the Council's boundary lines.

157: Introduction does not fully take account of the national planning policies and guidance. Specifically there are no comments made in relation to Scottish Planning Policy, which should be considered as one of the key documents to Scottish Planning. The key point from SPP is to "introduce a presumption in favour of development that contributes to sustainable development".

123: Noted from the Action Programme that there remains significant work to be carried out in order to deliver some of the masterplan zones. The Council are urged to realistically consider how achievable these aspirations may be and what procedures and sites are in place should a shortfall in housing numbers occur.

Modifications sought by those submitting representations:

Phasing and Infrastructure

148: Healthcare sites should be identified and set aside for healthcare facilities and should be capable of accommodating 50% expansion in the future. This should include the new sites allocated at Peterculter.

Employment Land

120: Devise the Action Programme to give priority to the development of associated employment land. Expand paragraphs 3.71 and 3.72 to make cross reference to other appropriate policies within the plan.

General Comments

102: Inclusion of OP41 Friarsfield in Table 8.

129: Include a Spatial Strategy Plan within the Introductory or Spatial Strategy sections of the Plan.

123: Requested that the council review the ability of the masterplan zones to create strong landscapes within which smaller developments in local communities can take place. The Proposed Plan does not provide a level of information to set out how these zones are to integrate with adjacent existing settlements and what their development mean for the context and setting of smaller sites.

Have a review of the green belt and green space network to assist in linking these zones without detrimentally affecting the small area of Bucksburn which has been omitted from either zone.

Include reference to how shortfalls from the masterplan zone developments are to be dealt with as the plan progresses.

157: Question the need for every major site to require a Masterplan created with community involvement, and would request a definition for major development to be included within the plan. Respondent believes this should only apply for sites of a certain size and would suggest 200 units or larger, rather than small sites. This is necessary to ensure the required 5 year land supply is met - small sites can assist where larger sites have not started or are not being developed as expected.

157: In order to assist the readability of the plan, respondent requests a table is included around page 8 which includes a breakdown of the locations, number of units and anticipated delivery timescales for all those identified brownfield sites, as per Table 2: Greenfield Development Allowances and Allocations. Respondent believes this will assist with the usability and understanding of the Plan, and provides a single location to determine the locations of development within Aberdeen.

Summary of response (including reasons) by planning authority:

Phasing and Infrastructure

9: We agree that it is important to assess infrastructure requirements associated with new development and publish these in a Local Development Plan (LDP). Such good practice aims to provide clarity to the development industry and other stakeholders. The broad infrastructure requirements are set out in Appendix 3 of the Proposed Plan. Masterplan Zones are identified to distribute infrastructure requirements and to assist the coordination of planning and delivering such infrastructure. Further detail on the phasing and timing of development and associated infrastructure is set out in the Proposed Action Programme (CD47).

111: Planning obligations can only relate to the development that is being proposed - developers cannot be obliged to 'make up' for pre-existing infrastructure deficiencies. From the outset of the Local Development Plan preparation, the Council has taken a proactive approach by identifying infrastructure required to support new development. This process has involved working with a range of organisations through the Future Infrastructure Requirements and Services (FIRS) Group to assess the capacity of existing infrastructure and its ability to cope with new development in each area of the City, and to then assess additional infrastructure required. Where it is considered necessary, conditions have been placed upon planning consents which limits the amount of development that can take place until a specified project is complete. An example is where the Council have restricted the number of houses that can be built in some developments prior to the completion of the Aberdeen Western Peripheral Route (AWPR).

148: The healthcare requirements arising from new developments were provided by NHS Grampian (who are part of FIRS) and are identified in Appendix 3 of the Proposed Plan and in the Proposed Action Programme. The Proposed Plan therefore sets out what is needed in each development but does not identify sites. The detailed siting of healthcare facilities within a new development is an issue that should be addressed in individual masterplans for sites. Setting aside further land for future expansion is considered unnecessary given that the Proposed Plan has a 20 year time horizon to 2035.

The Council considers that this approach represents a positive step forward for the planning and delivery of infrastructure by providing details of infrastructure requirements clearly and early in the Development Plan preparation process, based on the latest information available. Infrastructure provision and planning obligations will continue to be negotiated at the planning application stage. However, the approach provides clarity to all parties on what is generally expected to be provided as part of new development.

New Employment Land

120: The employment land allocations required by the Aberdeen City and Shire Strategic Development Plan (SDP) 2014 (CD12) are set out in Figure 6 of the SDP.

This requires the Aberdeen City Local Development Plan to allocate 105 hectares of employment land to 2026 and a further 70 hectares of Strategic Reserve Land for the period 2027-35. Table 2 of the Proposed Plan (on page 9) shows that we have allocated 143 hectares to 2026 (it reads 130 hectares which is an error addressed by the Council as a Non-Notifiable Modification (CD26)) and a further 66 hectares to 2035. The SDP also requires a minimum of 60 hectares of marketable employment land to be available at all times in Aberdeen City (Figure 6). The latest Employment Land Audit 2014 (CD35) shows that Aberdeen has 140 hectares available as of 2014 (Figure 4). We therefore consider that the employment land requirements of the SDP have been fully met.

Whilst it is reasonable to assume that the development of a new harbour at Nigg Bay will stimulate demand for employment land and sites in the vicinity, this is an issue which will be addressed in the next iteration of the Local Development Plan, and from the time the new harbour becomes operational. This has been recognised by the Harbour Board itself in the [Draft Nigg Bay Development Framework](#) which is currently under preparation. In the programme for delivery highlighted in the Development Framework (pages 36 and 41), consideration of additional land through a subsequent Local Development Plan review is scheduled for development in 2019 and in year 8 – i.e. the Main Issues Reports for the Local Development Plan 2021 and the Local Development Plan 2026 respectively.

General Comments

100: Whilst we would also like to see the aims of the Proposed Plan fully delivered, it needs to be borne in mind that the Vision (which is based on the vision of the SDP) is a longer term one that goes beyond the lifetime of the LDP to 2035. There will therefore be a number of reviews of the LDP before this time and, even assuming that the Vision remains consistent over this period, LDP's are likely to change in order to address changing circumstances and requirements. It should be noted however, that progress will be monitored through the Action Programme and reported in more detail in the next version of the Monitoring Statement.

The housing allowance is the number of dwellings that the SDP requires the Proposed Plan to allocate. This could be houses or flats.

In line with paragraph 60 of Scottish Planning Policy (SPP) (CD5), the Proposed Plan supports a Town Centre First approach to retail, commercial and leisure development. Office developments are encouraged into or close to the city centre and a specific West End Office Area has been identified (via Proposed Plan Policy B3) along with an area of proposed Specialist Employment Land to the south of Union Square around Poynerook. However, demand for city centre locations is high and space is limited and in order to accommodate anticipated business growth, the SDP requires significant employment land allocations to be identified as mentioned above. These are mainly concentrated in Bridge of Don, Dyce and the Airport, Kingswells and Altens. Although these are peripheral to the urban area of Aberdeen, they serve a much wider catchment that extends well into Aberdeenshire.

Considerable public investment into the transport system is currently underway with the construction of the AWPR, Third Don Crossing, Balmedie to Tippetty duelling,

A96 Park and Choose and the Dyce Drive link road. Other schemes are planned and land reserved in Proposed Plan Policy T1 - Land for Transport. In addition, the adoption in June 2015 of the Strategic Transport Fund as Supplementary Guidance to the SDP (CD19) will secure funding to deliver transport infrastructure required as a result of new developments in and around Aberdeen. Projects arising from this are listed in paragraph 3.44 of the Proposed Plan. Taken together with policies encouraging sustainable and active travel (Proposed Plan Policy T3), the means and investment is taking place to ensure that the city region's growth can be served by a fit for purpose transport system and supported by a robust policy framework.

102: Friarsfield is not included in Table 8 of the Proposed Plan because it was a site first identified in the Aberdeen Local Plan 2008 (CD43). It therefore pre-dates the allocations that have arisen out of the SDP and the Aberdeen City and Shire Structure Plan 2009 (CD20), and so does not count towards them. It is still identified as an Opportunity (OP) Site because parts of it are undeveloped and still have to obtain planning consent. The site at Brookfield/Murtle Den is considered in Issue 12 Alternative Sites in Deeside.

120: It is considered that the Proposals Map which accompanies the Proposed Plan provides an adequate representation of the Spatial Strategy in that it shows the allocations, Opportunity Sites and zonings for the whole city area. There are no settlements bisected by the city boundary, although two Opportunity Sites within the Proposed Plan, at OP53 Aberdeen Gateway and OP34 East Arnhall, comprise developments that extend into Aberdeenshire. The boundary and extent of the Energetica Corridor is shown in the Proposed Supplementary Guidance on Energetica (CD25).

157: Scottish Planning Policy contains advice which is applicable to all Planning Authorities in Scotland and seeks to ensure a broadly consistent approach amongst them. Appropriate referencing is made to it throughout the Proposed Plan and it is cited in paragraph 1.11 as one of the key documents that has informed the Plan preparation. The SDP and National Planning Framework 3 (NPF3) (CD04) contain parts which relate directly to Aberdeen. For instance the Proposed Plan and the SDP share the same Vision and NPF3 contains National Developments in Aberdeen. This is why both these documents have greater prominence in the Proposed Plan Introduction.

There is no evidence that increasing the size threshold of sites requiring a Masterplan will have an effect on the 5 year housing land supply. Issue 2 shows that the supply is in a very healthy position under current arrangements.

The table of brownfield sites appears in Appendix 1 of the Proposed Plan rather than the Introduction for two reasons. Firstly, its size means that it is more appropriately placed in the Appendices. More importantly, the tables are a snapshot of potential sites and consents at the time (in this instance taken from Brownfield Potential Study of 2014 (CD36). This changes over time as existing sites are developed and new sites emerge. This is a more fluid situation than that applied to the greenfield allocations which are identified in the Proposed Plan and which are effectively 'fixed' over the Plan period.

123: Paragraph 3.36 of the Proposed Plan explains that Masterplan Zones are identified within which developers will be expected to work together to prepare Masterplans for each zone, and coordinate the planning and delivery of associated infrastructure requirements. The Aberdeen Masterplanning Process - A Guide for Developers (CD46) explains what is expected from Masterplans and Development Frameworks including, in Section 3, their content. This should include a site description, including the surrounding area on issues such as open spaces, the landscape, Green Space Network and so on, and the context, identity and connections between them. We consider that it is for the Masterplans and Development Frameworks to consider the detail of integration with existing communities and smaller sites, rather than the Local Development Plan. Further, because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012 (CD42)), we do not consider that a review of the Green Belt and Green Space Network is necessary at this time. The potential for shortfalls in the housing land supply are discussed under Issue 2 - Housing and Employment Land Supply.

Reporter's conclusions:

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Reporter's recommendations:

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Issue 2	HOUSING LAND SUPPLY AND POLICY LR1 & LR2	
Development plan reference:	Pages 7-10	Reporter:
Body or person(s) submitting a representation raising the issue (reference no.):		
<p>Mr Gary Purves of Knight Frank LLP on behalf of Avant Homes (31) Mrs Eve Glegg (50) Mr Gary Purves of Knight Frank LLP on behalf of Mr McDonald (56) Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes and John Lawrie (Aberdeen) Ltd (64) Mr John Findlay of Ryden LLP on behalf of Stewart Milne Homes (85) Mr Sandy Hutchison (113) Mr Ian Livingstone of Ryden LLP on behalf of Stewart Milne Homes (117) Mr Anthony Aiken of Colliers International on behalf of MacTaggart and Mickel Homes (123) Mr Christopher Ross of Barratt North Scotland (125) Ewan Maclean of Emac Planning LLP on behalf of Stewart Milne Homes (128) Gladman Developments (129) Ms Christine Dalziel of Halliday Fraser Munro on behalf of CALA Homes (North) Ltd (131) Mr Dominic Fairlie of Aberdeen Civic Society (136) Mr Tim Reid of Urban Wilderness Ltd on behalf of The Reid Family (138) Mrs Theresa Hunt of Burness Paull LLP on behalf of Cults Property Development Limited (142) Mr Blair Melville of Homes for Scotland (149) Mr Steve Crawford of Halliday Fraser Munro on behalf of Drum Property Group (150) Ms Emelda Maclean of Emac Planning LLP on behalf of Scotia Homes (152) Miss Jennifer Woods of NLP Planning on behalf of British Airways (153) Mr Gary Purves of Knight Frank on behalf of Rubislaw Estates (154) Mr Bob Reid of Halliday Fraser Munro on behalf of Mr John McIntosh (156) Mr Oliver Munden of Persimmon Homes (157) Ms Meabhann Crowe of Colliers on behalf of AA Webster and Sons (162) Ms Meabhann Crowe of Colliers on behalf of MacTaggart and Mickel Homes and Mr Fabrizio Necchi (163) Mr Ben Freeman of Bancon Developments(183)</p>		
Provision of the Development Plan to which the issue relates:	Policies LR1 and LR2 (on page 10 of the Proposed Plan) make provision for phased housing and employment land release, and for the provision of mixed use communities where they have been identified.	
Planning authority's summary of the representation(s):		

Additional Housing Land Required

31, 56, 128, 129, 131, 150: Additional housing land should be identified to meet local need and comply with the requirements of the Strategic Development Plan. The policy does not meet with SPP's intentions of providing an effective 5 year land supply at all times

64, 117: The city's population, from the census figures is greater than the forecast figures, this discrepancy along with the low rate of housebuilding will likely result in housing shortages in the long term due to insufficient housing land allocations.

85, 138, 150, 152, 154: There has been a failure on the part of the LDP to deliver housing requirements, and this shortfall has been compounded by sites not being built out in the timescales expected (for example at OP38 Countesswells). There is a shortfall of 578 homes in the period 2016-2035.

150, 156: Carrying forward allocations as they are does not deal with historical housing need shortfalls, reduces supply relative to demand and increases the difficulty in those needing to access housing being able to do so. Liverpool and Sedgefield carry forward some or the entire historical shortfall into future housing land allocations over and above the need projected for that period. These allow housing delivery to catch up with housing need. Aberdeen's LDP ignores the historic shortfall.

152: The LDP should clearly set out the housing land requirement and housing land supply for the 5 year and 10 year period of the LDP, not just the SDP allowances. A Table that clearly sets out the 5 and 10 year housing land requirement would provide clarity and assist in the monitoring of the delivery of housing land. The Table should also illustrate an increase in the housing land requirement by 10-20%

142, 162, 163: The review of the LDP requires to critically assess the greenbelt boundaries currently identified in in the adopted Plan in order to find suitable land for development to meet SDP requirements for growth.

Large and Small Housing Sites

31, 56, 117, 123, 125, 128, 129, 131, 149, 152, 154, 156, 157, 162, 163: The allocations in the Proposed Plan are for large scale allocation; as evidenced in the Housing Land Audit no homes have been completed on these sites. Several of these sites are delayed due to various constraints. The reliance of existing allocated sites being carried out from the 2012 adopted LDP is flawed because there are situations where some/part of these historic allocations are large-scale and there remains a significant level of detailed work and consents to be put in place before deliverability on the ground will occur. There has been no test of their effectiveness as required by the SPP.

Small scale and readily deliverable sites are required to make up the shortfall of effective land supply. The ability of small-scale greenfield sites to be released and built-out in a timeous manner should be acknowledged in the emerging Plan. The Plan does not currently support small-scale residential land releases which are

responding to local needs

The Council have not suggested to include a draw-down mechanism to meet any shortfall which may occur in Phase 1 or 2 of the land release schedule. Provisions should be made within Policy LR1 regarding the role smaller-scale sites have to play in meeting overall housing targets. There should be an allocation of a wider range of sites in terms of scale and location to ensure greater flexibility. Policy LR1 would therefore benefit from an additional Part C setting out the Council's response in the event that a 5-year effective land supply is not maintained.

Policy LR1 and LR2

183: Part B is redundant as Phase 2 sites are reliant on Phase 1 sites being built out. Two of the sites identified on the Proposed LDP to delivering houses beyond 2026 are constrained in the HLA 2015, and could not be drawn down early.

183: LR2: Delivery of Mixed Use Communities - It is not clear to which site this policy applies.

136: Whilst paragraph 2.18 refers to encouraging mixed use, this is not reinforced by Policy LR1, which should contain wording which reinforces the desire for all large-scale developments to be mixed use.

153: NPF3 identifies improvements to Aberdeen Airport as one of the developments considered essential to the delivery of the Aberdeen Spatial Strategy. In order to safeguard and build upon the future role of the Airport, consistent with this NPF3 objective, it is important that any land use allocations and any proposed development that comes forward within these allocations should have appropriate and proper regard to airport operations.

Less Housing Land Required

50, 113: Questions whether additional houses are needed due to the downturn in oil. The reality is that most housing developments cannot be completed in Aberdeen.

Brownfield Housing

64: SPP encourages the prioritisation of brownfield land. The SDPA aims to provide 40% of all new residential development on brownfield land. This is not reflected in the current housing allocations.

152: Whilst the LDP (para 2.13) states that future Local Plans will continue to identify brownfield sites to meet housing allowances beyond the next 7-10 years, this LDP does not provide certainty that the brownfield housing land supply will be achieved through allocations in this LDP in the period up to 2026, as required by Figure 1 of the SDP. A shortfall in the supply of deliverable brownfield sites provides justification for releasing additional greenfield land to accommodate the shortfall.

Modifications sought by those submitting representations:

Additional Housing Land Required

31: Remove land adjacent to the Mill of Mundurno from the Green Belt and Green Space Network and identify it as greenfield housing allocation post 2017.

117: Allocate effective sites such as Derbeth, Gillahill and Huxterstone.

152: Introduce additional sites to augment the supply. These include land at Foggieton, Countesswells, land at Kingswells East and land at Shielhill Farm.

162: Allocate land at Derbeth Farm

56, 85, 128, 142, 150, 183: In order to comply with the SDP targets there must be additional greenfield housing land allocations made in the forthcoming LDP which are immediately available and are without any constraints to their delivery. Change Section 2 and the Proposals Map as appropriate.

123, 163, 183: Allocate additional small sites.

152: Introduce a new table clearly identifying the housing land requirement and housing land supply over the 5 and 10 year period of the LDP, together with a 10-20% increase on the housing land requirement.

Policy LR1 and drawing down additional sites to augment supply

128, 149, 152: The wording of LR1 should be changed to ensure that a minimum five year supply is maintained at all times. If there is a shortfall in the effective land supply, the Council should consider further proposals that are effective.

129: Include a policy for assessing housing proposals on unallocated land when faced with a shortfall in the housing land supply.

153: The preamble text to Policy LR1 should provide explicit guidance to developers at the outset in relation the constraints that airport operations impose upon development.

Policy LR2

183: Define a large site, therefore where this policy should be applied.

Summary of response (including reasons) by planning authority:

General Overview

Aberdeen City sits within the Aberdeen Housing Market Area, along with those parts of Aberdeenshire closest to the city. As a consequence, there is a shared responsibility for meeting the housing requirement in this area. This is facilitated by the Aberdeen City and Shire Strategic Development Plan 2014 (SDP) (CD12) which clearly sets out the responsibilities of each council in terms of the provision of housing land.

The Aberdeen City and Shire Strategic Development Plan was approved by Scottish Ministers in March 2014, before Scottish Planning Policy (SPP) (CD5) was published in June 2014. Some of the terminology in the SDP differs slightly from SPP, although they are broadly consistent.

The Housing Requirement (set out in SDP Figure 10) equates to the Housing Supply Target under SPP – setting out a target for new homes over the period to 2035. In order to facilitate this, Housing Allocations (in SDP Schedule 1) are set out which need to be allocated in the respective local development plans, equating to the housing land requirement. As demonstrated in the Housing Land Audit (CD17), the adequacy of the supply of housing land is measured with reference to the Housing Requirement.

New information in the form of the census or new population or household projections are an issue for the next Housing Need and Demand Assessment (HNDA) to inform the next Strategic Development Plan, as confirmed by the SDP Examination. The task of the Local Development Plan is to implement the SDP.

The Aberdeen Housing Market Area has a very generous supply of effective housing land – both at the current time but also well into the future.

Additional Housing Land Required

31, 56, 64, 85, 117, 128, 129, 131, 138, 142, 150, 152, 154, 156, 162, 163: The Aberdeen City and Shire Strategic Development Plan 2014 sets a clear strategy for development in Aberdeen, which includes housing allowances to be delivered through Local Development Plans. Paragraph 4.18 of the SDP explains that expectations of housing need and demand over the period to 2035 have been assessed in a Housing Need and Demand Assessment 2011 (CD14). The housing requirement is set out in Figure 10 of the SDP and shows a total requirement of 53,972 homes over the Strategic Development Plan area to 2035 – 38,488 of which is in the Aberdeen Housing Market Area. Schedule 1 of the SDP (on page 42) shows the housing allowances required to be identified in the Local Development Plan. The SDP explains in paragraph 4.24 that these allowances provide a generous supply of land for new housing on top of the housing requirement in line with Scottish Planning Policy. For the SDP area the allowance is for 67,500 homes (plus an effective supply in 2011 of 9,815) compared to the requirement of 53,972 homes (representing 43%

generosity). In the Aberdeen Housing Market Area, the generosity level is 49% (land for 57,418 homes against a requirement of 38,488).

As a consequence, a very generous SDP allowance has already been provided by the Proposed Plan over and above the actual requirements, exceeding the levels required by the new SPP. There is therefore no need to add to this as has been requested. In addition there is no remit for the Proposed Plan to allocate significant amounts of additional land which would cause it to be inconsistent with the SDP. Circular 06/2013 Development Planning (CD10) states in paragraph 56 that LDP's need to be consistent with the SDP. Paragraph 4.25 of the SDP clearly states that LDP's have to make land available for homes in line with the Spatial Strategy and Schedule 1 of the Plan. Table 2 of the Proposed Plan (page 9) shows how these allowances have been met. This Table shows that, for the periods up to 2026, the Proposed Plan allocates 16,982 greenfield homes which is just 18 homes short of the 17,000 SDP allowance over the same period. This 0.1% 'shortfall' is not considered to be of any material significance in the context of a very generous allowance.

The Housing Land Audit indicates that the area is on-track to deliver housing completions in line with the housing requirement over the period 2011-2016. In any event, because of the SDP compliance issue, it is not possible to carry forward historical shortfalls, even if they do exist. Nevertheless, sites which have been allocated in previous Local Plans and the extant Local Development Plan 2012 continue to be identified where appropriate. For instance, proposed sites OP41 Friarsfield and OP58 Stationfields in the Proposed Plan continue to be identified from the Aberdeen Local Plan 2008 (CD43). These do not count towards the SDP allowances.

It is not appropriate to rely on recent census or population / household forecast figures to argue for a higher requirement and allocations from those contained in the SDP for the same reason. In any event, the generosity of the SDP allowances is such that it should be possible to accommodate any potential demands arising from fluctuations in forecasts. This was confirmed at the SDP Examination (Issue 5), while the most recent 2012-based projections are lower than those put forward to justify an increase at that time. The Housing Need and Demand Assessment is the vehicle for addressing these issues, not the local development plan. Development Plans need to provide certainty for developers, agencies, infrastructure providers and the public. Constantly reacting to variations in census data (either up or down) would not achieve this.

Monitoring the delivery of housing land is carried out in the annual Housing Land Audits that are prepared jointly between Aberdeen City and Aberdeenshire Councils. There is no need to repeat this in the Local Development Plan. As mentioned under Issue 1, because of the very limited scope of additional greenfield land release (over and above that already identified in the extant Aberdeen Local Development Plan 2012 (CD42)), we do not consider that a review of the Green Belt is necessary at this time.

Specific Sites

31, 152: The sites at Mundurno and Shielhill are dealt with under Issue 4 Alternative Sites in Bridge of Don.

117, 162: The sites at Derbeth, Gillahill and Huxterstone are dealt with under Issue 8 Alternative Sites in Kingswells and Greenferns.

152: The sites at Foggieton and Countesswells are dealt with under Issue 10 Alternative Sites in Countesswells.

Large and Small Housing Sites

31, 56, 117, 123, 125, 128, 129, 131, 149, 152, 154, 156, 157, 162, 163: There is no shortfall in the 5 year effective land supply. The 2015 Housing Land Audit (HLA) shows the latest position in its Section 5. Section 5.4 shows a continuing upward trend of supply in the Aberdeen Housing Market Area. Paragraph 5.4.2 states that, for the fourth year in a row, the 5-year effective supply in the Aberdeen Housing Market Area has increased and it now stands at 12,091 homes - its highest level since Local Government reorganisation in 1996.

Figure 13 of the Housing Land Audit 2015 shows an effective supply in the Aberdeen Housing Market Area of 12,091 homes compared to an SDP requirement of 7,827 homes, which amounts to 7.7 years supply – well in excess of the 5-year requirement set out in SPP. Appendix 3 of the HLA shows the actual and anticipated housing completions over the SDP area. The anticipated completion rate in 2016 is 2875 homes which compared favourably with the SDP target of building at least 2500 homes a year by 2016 (on page 32 of the SDP). Figures then rise to over 3000 homes per year for 2017-19 which is ahead of the SDP target of moving towards building 3000 homes a year by 2020. Anticipated figures then begin to drop again beyond year 5, but this is to be expected in any such Audit. However, the effective supply beyond 2019 is higher than it is within the period 2015-2019. It would be reasonable to expect further windfall, brownfield and currently constrained sites to be added to the supply to boost these figures over that period.

Of the 25 greenfield housing sites identified in Tables 3 to 8 of the Proposed Plan, 16 sites are of 500 homes or less, with 11 being less than 100 homes. In addition there are 43 brownfield sites identified in Proposed Plan Appendix 2 - Opportunity Sites which are suitable for residential uses or a mixture of uses, including residential. Brownfield sites with the potential for residential use are identified in the two tables at the end of the Brownfield Potential Study 2014 (CD36). There is therefore a very wide range of sites both large and small, brownfield and greenfield which are collectively contributing to a very positive picture for future house completions.

The identification of a number of large sites is necessary in the context of the generous SDP housing allowances that are required. Large sites support a range of facilities and services within the new development, enable the delivery of significant infrastructure improvements, and avoid the problems that disjointed incremental growth has. Through the Site Assessment process (CD28 to CD31) we have sought

to identify sites which can make the most efficient use of existing infrastructure. It is acknowledged that large sites take longer to come to fruition. The Housing Land Audit 2015 shows a snapshot position as of 1 January 2015. Although some of the allocated sites are regarded as constrained at that point, Scottish Planning Policy (paragraph 19) requires city regions to allocate “a range of sites which are effective or *expected to become effective in the plan period* to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption.” All of the large sites identified in the Proposed Plan have either a Masterplan or Development Framework in place which has been adopted as Supplementary Guidance to the extant Local Development Plan 2012. The 2015 Housing Land Audit shows that several of these will start delivering completions within the next 5 years. These will help to ensure the maintenance of a continuing 5 year supply housing supply over the lifetime of the Proposed Plan, and beyond.

In summary, we have a generous housing allowance resulting in a wide range of greenfield and brownfield sites being identified in the Proposed Plan. These are likely to be augmented by further windfall and brownfield sites and sites identified through future Brownfield Potential Studies. There is a very healthy land supply and this is likely to be maintained as the larger sites progress. In this context there is no need for a draw down mechanism to augment the supply. In any case, such a mechanism is not identified in SPP.

The suggestion that larger sites which will not deliver their full Phase 1 allowance in the current Phase should have this short fall re-allocated to new sites is noted. It is recognised that this suggestion is not that this shortfall should be removed from these sites, but rather re-scheduled to a later Phase. In effect the shortfall would then become an additional allocation to make up for the initial delay. However, to redistribute allowances based on an initial ‘delay’ to the start of a site would remove the certainty which the Plan aims to provide and could impact on the deliverability of larger sites. It also represents a misunderstanding of the housing allowances, which were never designed to be built out within the period for which they were allocated (SDP para 4.24). If that had been the intention, completions would have had to exceed 6,000pa over the last few years (9815+27,300 built over 6 years) – more than double the highest individual year’s completions over the last 35 years. This would be contrary to the SDP which is clear in its allocations for all Phases up to 2035.

The SDP recognises that front loading the allowances in the way it does means it is unlikely that all of them will be delivered in the timescales. Paragraph 4.24 of the SDP explains that, due to this generosity, “we cannot expect all the new homes to be built within the relevant plan period. This makes sure the plan can cope with higher levels of demand than we currently expect.”

Policies LR1 and LR2

128, 129, 149, 152, 183: As detailed in the paragraphs above, it is not considered necessary to have a draw down mechanism to augment the land supply.

183: Proposed Plan Policy LR2 applies to those large sites which contain both a residential and employment allocation and these are identified in the Directions for

Growth (Tables 3 to 8 in the Proposed Plan). It is accepted that this is not immediately obvious. For the avoidance of doubt Proposed Plan Policy LR2 covers OP9 Grandhome, OP33 Greenferns, OP36 Countesswells, OP59 Loirston and OP48 Oldfold.

136: Proposed Plan Policy LR1 is about controlling the phased release of allocated greenfield housing and employment sites. We would agree that all large scale developments should be mixed use. This is embedded in much of the Proposed Plan but it particularly expressed in Proposed Policy D1 - Quality Placemaking and Design. Masterplans or Development Frameworks have been adopted as Supplementary Guidance to the extant Local Development Plan 2012 for all the large greenfield releases, and these studies set out in detail the mix of uses expected in each site. It would be our intention to readopt these Masterplans and Development Frameworks upon adoption of the Proposed Plan.

153: The operations of Aberdeen Airport are dealt with in Proposed Plan Policy B4 – Aberdeen Airport. This covers the Airport Safeguarding Area and highlights Circular 08/2002 – Control of Development in Airport Public Safety Zones. Noise issues are dealt with in Proposed Plan Policy T5 - Noise. Further detail on public safety zones, noise contours, safeguarding maps and operations area are covered in a Technical Advice Note on Land Use Planning and Aberdeen Airport 2015 (RD42). It is not considered necessary to repeat these issues in Proposed Plan Policy LR1.

Less Housing Land Required

50, 113: The above paragraphs explain why it is not possible to depart with any degree of significance from the requirements of the SDP. Paragraph 4.27 of the SDP recognises that meeting housing and population targets also depends on factors that are not related to the Development Plan, including the state of the economy and, particularly in Aberdeen, the price of oil. However, the SDP's Spatial Strategy has been agreed and the Proposed Plan identifies Aberdeen's contribution towards that. This ensures that the Proposed Plan can cope with higher levels of demand than we currently expect.

The SDP review process over the next few years will factor in emerging evidence of economic and housing market performance through a new Housing Need and Demand Assessment. This will subsequently feed into the next LDP.

Brownfield Housing

64, 152: Schedule 1 of the SDP sets out the brownfield housing allowances for Aberdeen City. For the two periods from 2011 to 2026, the allowance is for 7,500 homes, which equates to 500 homes per annum. Our approach to meeting this is set out from paragraph 2.8 of the Proposed Plan. This explains that we have identified sites with planning consents from 2011 (in Proposed Plan Appendix 1 Table 2) amounting to 2808 homes (up until 31 August 2014), and that these have not been double counted against those sites found in the effective land supply of 2011 which was used by the SDP. Added to this are the sites in Proposed Plan Appendix 1 Table 1 which were identified through the Brownfield Potential Study of 2014. This uses a number of different calculations to estimate the potential yield of identified

sites – in this case between 2590 homes to 4479 homes. When added to the consented sites, this amounts to between 5398 and 7287 homes (or between almost 11 years to 14.5 years when set against the SDP allowances of 500 homes per annum). Section 4.1 of the Brownfield Potential Study 2014 suggests that this is a conservative estimate.

It is not practical to identify brownfield sites too far into the future. It is also inevitable that more, as yet unidentified, brownfield sites will continue to emerge over the lifetime of the Proposed Plan. Much of this will be driven by the buoyant housing market here. Section 2.2 of the Brownfield Potential Study shows that brownfield housing completions have averaged 688 homes a year for the period 1993 to 2013. Only for the 3 years following the financial crash (2008-10) have there been fewer than 500 brownfield homes completed in each year (which is what the SDP requires).

In this context it is not considered appropriate to augment any potential shortfall of brownfield sites with further greenfield releases. This would be contrary to the SDP target for 40% of all new houses in Aberdeen City to be on brownfield sites (page 37 of the SDP). We will however, continue to monitor ongoing consents, completions and brownfield potential through regular updates of the Brownfield Potential Study.

Reporter's conclusions:

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Reporter's recommendations:

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