

SUBMISSION No.	035
KEYWORD	
?	
SUBJECT ID	3

## MAIN ISSUES REPORT ADDENDUM RESPONSE FORM

As part of the development of the Proposed Local Development Plan a "Main Issues Report" was published in October 2013. This contained 19 questions, the responses to which we are using to inform the content of the new plan. Importantly the 2013 Main Issues Report was based on a draft Scottish Planning Policy document, which was published by Scottish Ministers in April 2013.

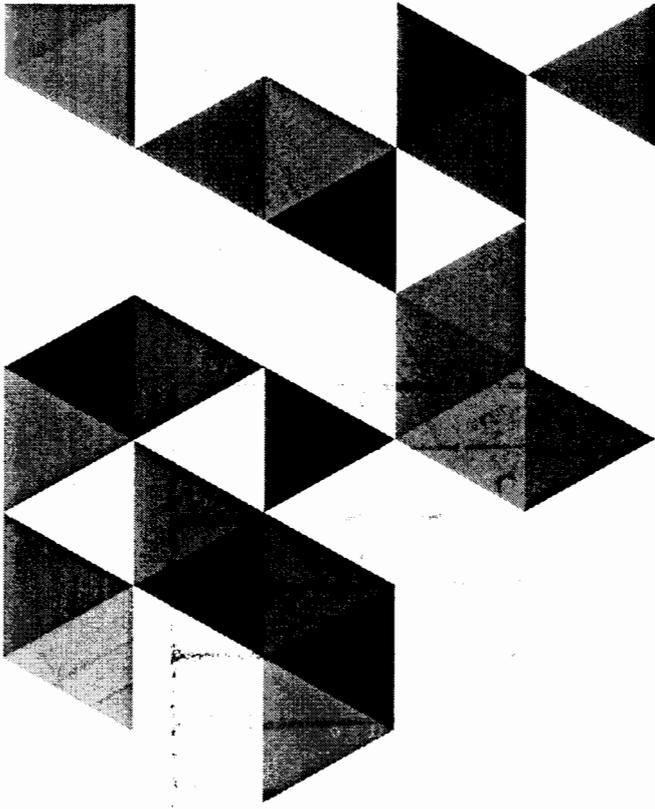
The publication of the final Scottish Planning Policy in June 2014 raised a very small number of new issues on which we would welcome your views. Because of this we have chosen to publish an addendum to the Main Issues Report to highlight possible local interpretations of Scottish Planning Policy.

We are not reopening consultation on the range of other issues that were considered as part of the 2013 Main Issues Report, and ask that you only consider the limited number of additional issues set out in the Main Issues Report Addendum in any response you make.

Please note that further comments on any of the other issues that were included in the 2013 Main Issues Report will not be considered at this stage.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the specific proposals contained in this plan when it is published, in January 2015.

**Please email to  
ldp@aberdeenshire.gov.uk  
or send this form to reach us  
by 19th September 2014.**



Please use this form to make comments on the Aberdeenshire Local Development Plan Main Issues Report Addendum 2014. If you are making comments about more than one topic it would be very helpful if you could fill in a separate form for each comment.

Please email or send the form to reach us by 19th September 2014 at the following address:

Post: Planning Policy Team  
Infrastructure Services  
Aberdeenshire Council  
Woodhill House  
Westburn Road  
ABERDEEN  
AB16 5GB

Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

## YOUR DETAILS

Title Miss

First name Laura

Surname English

Date 18 September 2014

Postal Address Keppie Design, 160 West Regent Street, Glasgow

Postcode G2 4RL

Telephone Number 0141 204 0066

E-mail lenglish@keppiedesign.co.uk

Are you happy to receive future correspondence only by email - Yes  No

Are you responding on behalf of another person? Yes  No

If yes who are you representing Stewart Milne Homes

*An acknowledgement will be sent to this address soon after the close of consultation.*

# YOUR COMMENTS

Please provide us with your comments below ensuring you highlight the issue you are commenting on. Please feel free to add any extra pages you may require, ensuring you highlight the issue. We will summarise long comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Are you answering a question? Yes / ~~No~~

Question Number being answer

3

Stewart Milne Homes have submitted previous representations to the preceding stages of the Local Development Plan process and having reviewed the current Addendum, feel it is necessary to comment in response to chapter 4: Land Supply and Distribution (previously Main Issue 12) and specifically respond to question 3.

It is noted that the Strategic Development Plan (SDP) has now been formally approved and that the Council "expect" that the allocations in the Local Development Plan will be sufficient to meet the required development levels of the plan period. It is submitted however that there is no reason why the Council cannot exceed the level of housing suggested by the SDP in order to provide a generous supply throughout the plan period.

The recently updated Scottish Planning Policy (SPP 2014) requires that "plans should indicate the number of new homes to be built of the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided" (paragraph 116). It is acknowledged that the 2012 based household projections (published in July 2014) indicate a lower number of new households, however it is also highlighted that, for the period between 2017 - 2026, the projections are still higher than those identified in the Strategic Development Plan (figure 10). This would demonstrate that there is actually a shortfall in the supply to be provided in the SDP area, with a shortfall of circa 2000 units. Where such a shortfall exists, regardless of the level of shortfall, it is still submitted that the Council have failed to create a generous supply of land in line with the SPP requirements.

It is noted that the addendum indicates a 6.2 year supply of effective land, however it is submitted that this does not fully account for a generous supply and fails to reach the 10-20% margin as indicated by the SPP. The SDP actually sets a target build rate of 2,500 houses per year by 2016 and 3,000 per year by 2020, which if using a conservative guesstimate, would equate to a requirement to supply land for 28,000 homes. To put this in context with the housing land supply (as per the 2014 Housing Land Audit) identified by the Addendum (and MIR) where 24,400 houses are proposed through the SDP, there is clearly a shortfall of around 4000 units in order to maintain an effective post 5 year supply.

In addition to this identified shortfall, it is considered that the current supply of housing identified by the Council in the MIR relies too heavily on a small number of large sites within the Aberdeenshire area. It is noted from the Strategic Development Plan Reporters Report that the Reporter highlights that "I am in no doubt though, that a mix of site sizes would be best placed to achieve the growth rates required in the proposed plan" (page 71, paragraph 18), illustrating that a wider mix of site sizes should be the preferable way forward. One of the large sites progressed is the new settlement at Chapleton of Elswick, where, if issues arise in the future in terms of servicing, the Council could find themselves struggling to maintain the effective 5 year supply of housing.

We have highlighted before in previous representations that the Chapleton of Elswick development is already behind schedule and will not deliver as many houses in the shorter term as originally expected. We would still contend that, with only 200 homes programmed for delivery in Elswick upto 2016, that there will still be a significant shortfall carried over to the next period from 2017-2026, and given the continuing need for housing in Aberdeenshire, it would be remiss of the Council to not ensure a continued supply of houses in the shorter term, rather than relying heavily on the Elswick development which, due to the sheer scale of development, is clearly a longer term prospect.

To assist in the delivery of short term houses, it has been and still is suggested that the Schoolhill Phase 2, Portlethen site could assist with the delivery of housing in the short term to bridge the gap in the supply which will be left by the under performance of the Chapleton of Elswick development. It is submitted that the Schoolhill Phase 2 site could be developed alongside the Elswick site to assist with the deficit in housing completions in the short/medium term. Whilst it is acknowledged that the proposed site at Schoolhill Phase 2 is also a large site which could span over 3 audit periods, this site is more accessible and already has substantial infrastructure in place as a starting block for the shorter term housing to be built upon. Stewart Milne Homes have also demonstrated a market in the Schoolhill area and with the current sales in the Leathan Fields element of the site, there is clearly still a demand for housing in this location. The allocation of the Schoolhill Phase 2 site would allow for a natural extension to the existing settlement and enable the creation of a more focused centre providing a wider range of community facilities to the local residents.

## YOUR COMMENTS

Please provide us with your comments below ensuring you highlight the issue you are commenting on. Please feel free to add any extra pages you may require, ensuring you highlight the issue. We will summarise long comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Are you answering a question? Yes / ~~No~~

Question Number being answer

In direct response to question 3: "Do you agree with the assessment of land supply in light of the updated information? If not, please explain why", we would respond 'no' we do not agree with the current assessment of land supply for the following reasons:

- The Council has failed to provide a 10-20% generous supply of land as per Scottish Planning Policy guidance;
- The Council has placed too much reliance upon the successful delivery of a small number of large development sites, where, if issues occur in terms of delivery, then the Council will struggle to ensure an effective 5 year supply at all times;
- We consider that the programming for the Chapelton of Elsick development is very optimistic;
- The Council has the option to provide a more generous supply of land, over and above the recommendations of the Strategic Development Plan and it should do so in order to provide a greater choice of housing in the short term;
- The Schoolhill Phase 2 site provides an opportunity for the delivery of short term housing to augment the supply in light of the slower delivery of the Chapelton of Elsick development. Schoolhill Phase 2 is an effective site (as demonstrated in chapter 5 of the previous MIR submission), it is in a sustainable location with access to existing infrastructure and has a proven market within which there is still a current demand for housing. The site has the opportunity to expand and complement the existing housing development at Leathan Fields whilst providing much needed community facilities (including a health centre).

It is submitted that the Council do not have to rigidly stick to the housing numbers suggested by the SDP and that there is an opportunity here to provide a greater choice of housing in the short term through the release of the Schoolhill Phase 2 site at Portlethen.