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E-Mail Enquiry

Class: LDP
To: ldp@aberdeenshire.gov.uk
CC:
From: [REDACTED]
Date: 18/09/2014 16:28:26
Subject: [ACE/605481] Local Development Plan
Status: New Enquiry
Owner: No Owner Assigned
(Individual dealing with the Enquiry.)
Age: 0
(in work days)
Comments:

Enquiry Text

Formstack Submission for form Local Development Plan

Submitted at 09/18/14 4:28 PM

Submission date:
Sep 18, 2014 04:22 PM



SUBMISSION No.		039
ISSUES RAISED		
8/3		
SUPPORTING DOCS		

Are you responding on behalf of another person?:
Yes
Please state who you are representing:
[REDACTED]

The objectives of the Plan / The settlement strategy to be adopted:
Question 3: Do you agree with the assessment of land supply in light of the updated information? If not, please explain why.
Question 1 Comments:

Question 2 Comments:

Question 3 Comments:
Introduction

This brief submission has been prepared in response to the publication of the Addendum to the Aberdeenshire Local Development Plan Main Issues Report. It is separate from but should be read in conjunction with the submissions made to the MIR by Taylor Wimpey and the Mitchell Partnership.

The narrow scope of this consultation, as set out within the Addendum, is noted. It is, however, welcomed that the Council, in light of both the approval of the 2014 Housing and Audit and Scottish Planning Policy in particular, are providing an opportunity for comments to be made. Accordingly, the following comments are offered in respect of the issues articulated within section 4 Land Supply and Distribution (previously Main Issue 12) of the Addendum.

Land Supply and Distribution

Aberdeen and Shire SDP/2014 Housing land Audit

Section 4 of the Addendum notes the approval of the Aberdeen City and Shire Strategic Development Plan and with it, the housing land requirement for the housing market areas. The Addendum also notes that the 2014 Housing and Audit confirms there is in excess of the required 5 year effective housing land supply within the Aberdeen Housing Market Area.

- 8/3 However, what it does not do is provide an assessment of whether this supply is in the right place or whether there are specific settlements with specific local issues that justify an allocation with the purpose of addressing these key local concerns. The LDP is required to do this. In respect of Inverurie, it does not.
- 8/3 With the flexibility which is required by the SPP, the Council can, where a case is demonstrated, allocate land in addition to that which is required to meet the housing land requirement articulated in table 3: Housing Land Requirement and Effective Supply (2014 Housing Land Audit) within the Addendum. It is argued that such a case exists at Inverurie.
- 8/3 Following the publication of the MIR and the 2014 Housing Land Audit, it has become more apparent that the proposed new Uryside Primary School, which has yet to be built, will not be large enough to accommodate all of the pupils who are expected to come from the allocated/consented housing development at Uryside. Given the constrained nature of the approved school site, there is no prospect of it being extended. Accordingly, and given that this capacity issue will arise during ALDP 2, there is a fundamental requirement for a solution, or range of potential solutions, to be explored now.
- One solution may be to identify land for a second new school with an appropriate level of residential development which could cross fund, in part, the delivery of

the new school. This would allow the Council to dispose of Market Place school and secure a capital receipt. The LDP needs to explore the options which will be required if this issue is to be addressed. Taylor Wimpey and the Mitchell Partnership have consistently offered land at Souterford for such purposes.

The 2014 Housing Land Audit provides a snapshot of housing land supply. What it does not do is consider whether the type of housing programmed for delivery provides a range of sizes and costs which provide housing required by a local community. This assessment and understanding should be done through the MIR but appears to be absent from officers' consideration of the issues raised at this stage.

Inverurie continues to be acutely affected by too few developers, a slow build out rate and too many large expensive luxury houses. There are over 1200 households on the current housing waiting list for Inverurie/Port Elphinstone and there is plenty of anecdotal evidence of a chronic lack of affordable and accessible housing for key workers, young families and so on.

ALDP 2 should provide an opportunity for this significant issue to be properly and fully explored with all key stakeholders including the community council, developers and the Council with the purpose of identifying measures aimed at addressing the chronic shortage of affordable and accessible housing in the town.

In this, Taylor Wimpey/The Mitchell Partnership remain committed to the delivery of family housing on their land at Souterford/ Lofthillock

Scottish Planning Policy

The Addendum correctly identifies the publication of the new Scottish Planning Policy in June 2014. Whilst the brief summary provided in the Addendum is helpful, key changes, including the presumption in favour of sustainably located development and the promotion of the town centre, is not mentioned.

According to the Addendum, whilst the publication and content of the SPP may not provide a strategic justification to allocate additional land, it does require the Council to re assess all of the preferred allocations and, indeed, proposed allocations which have been discounted, based on this policy principle of sustainability.

For example, in Inverurie, the identification of land at Conglass, given its remoteness from the town centre and public transport links can only be a car reliant. Accordingly, this allocation does not fit with the SPP's sustainability principle. Instead, there is little doubt that an allocation at Souterford/Lofthillock, which is closely located to the town centre, train station and bus hub, is in accordance with the SPP's sustainability principles.

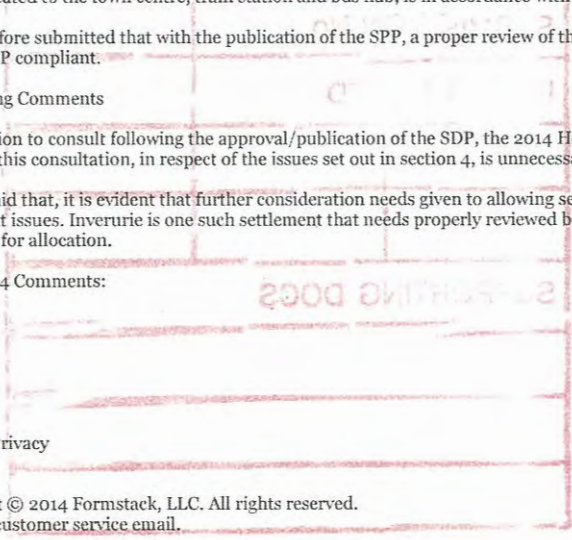
It is therefore submitted that with the publication of the SPP, a proper review of the allocations proposed by officers be undertaken to ensure that the proposed LDP is SPP compliant.

Concluding Comments

The decision to consult following the approval/publication of the SDP, the 2014 Housing Land Audit and the SPP is welcomed. However, it does appear to be the case that this consultation, in respect of the issues set out in section 4, is unnecessarily limited.

Having said that, it is evident that further consideration needs given to allowing settlement specific land allocations that are designed to address specific settlement issues. Inverurie is one such settlement that needs properly reviewed both in respect of education and housing issues but also in respect of what is proposed for allocation.

Question 4 Comments:



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History

- 18/09/2014 16:28 Enquiry (Current Document)
- 18/09/2014 16:37 Automatic Reply