

SUBMISSION No.	057	3
ISSUES RAISED		
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SUPPORTING DOCS		

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.

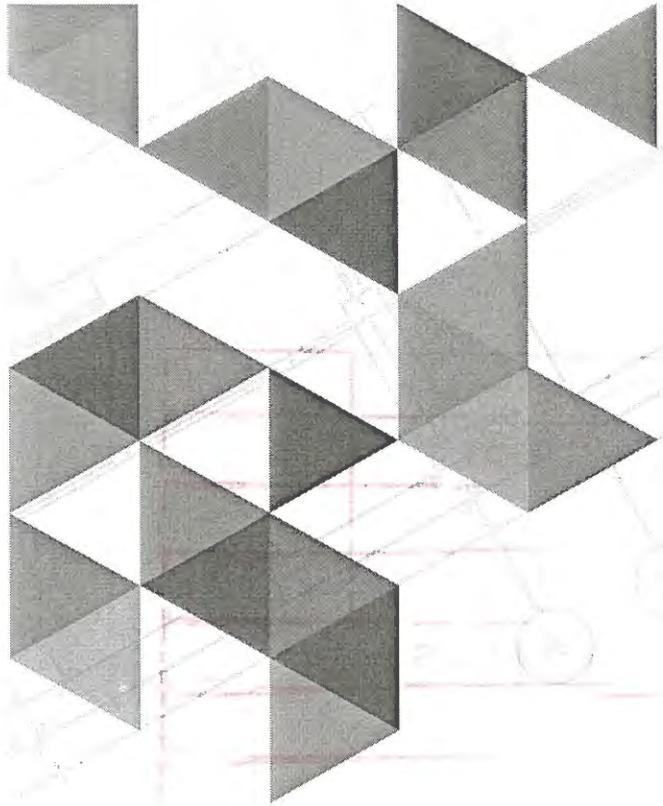
The publication of the final Scottish Planning Policy in June 2014 raised a very small number of new issues on which we would welcome your views. Because of this we have chosen to publish an addendum to the Main Issues Report to highlight possible local interpretations of Scottish Planning Policy.

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

YOUR DETAILS

Title

First name

Surname

Date

Postal Address

Postcode

Telephone Number

E-mail

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

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

Question Number being answer

Please refer to attached Paper Apart.

PAPER APART

Aberdeenshire Local Development Plan 2016: Main Issues Report Addendum 2014 Representations on behalf of Sandlaw Farming Co relative to Land Supply & Distribution

Introduction

Sandlaw Farming Co does not accept the position advocated by Aberdeenshire Council relative to the housing land supply. The 'do nothing' approach is entirely unacceptable. Scottish Planning Policy (SPP) requires development plans to be up-to-date and relevant and the failure to take account of the most recent information is likely to result in it being neither.

In responding to the Main Issues Report (MIR) Sandlaw Farming contended that Aberdeenshire Council should;

- Respond fully and appropriately to the requirements of the Scottish Government's new housing strategies, particularly with reference to the provision for private market rental housing as detailed in the policy document "A Place to Stay, A Place to call Home" published in May 2013.
- Base its housing assumptions on current population growth estimates as detailed by the National Register for Scotland 2012.
- Ensure an effective forward 5-year land supply at the end of the LDP period.
- Reflect Scottish Planning Policy on the location of new allocations adjacent to settlements.

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Unfortunately, the addendum makes no substantive additional allocations, but simply draws on more recent household projections and the 2014 Housing Land Audit to justify the status quo. The fact is the plan is currently informed by 2008 based household projections which have now been superseded on two occasions by more recent projections. If the plan is to be up-to-date and relevant it is these more recent projections that should be used.

Setting aside the revised household projections, a robust analysis should be undertaken in light of the changes introduced by Scottish Planning Policy related to the effective land supply. This would ensure there are sufficient allocations that are effective or expected to become effective in the Plan period, to maintain at least a 5 year effective land supply at all times. This is reinforced by the new Scottish Planning Policy's requirement to identify a "generous" supply of land for each housing market area and its advice that the housing supply target should be increased by a margin of 10% to 20% (Paragraph 116).

Revised Household Projections

The housing requirement set out in the Strategic Development Plan is derived from the 2008 based household projections published against the background of a reduction in new house building and a constrained mortgage market. The 2010 based projections, published in June 2012 forecast a significant increase in household formation.

The revised household projections, which are lower than the 2010 based are cited in the addendum as justification for not increasing the housing allocations. However, an analysis of the 2012 based projections published in July 2014 indicates that the principal projection still demonstrates a higher requirement for the period 2017 to 2026 than is set out in Figure 10 of the Strategic Development Plan. Overall in the City and Shire the shortfall is approximately 2,000 units. This shortfall remains a significant concern, particularly in the context of SPP requiring the provision of a generous land supply. Additional allocations are therefore required to ensure the provision of sufficient land throughout the lifetime of the Plan and beyond.

Indeed, to ensure at the very least an adequate supply of land, the high migration variant of the household projections should be used. This would suggest a shortfall in the City and Shire over the period 2017 to 2026 of around **6,700** units.

On the basis of the above it is contended that notwithstanding the lower household projections, there is justification for increasing the housing allocations to ensure a generous supply of land capable of maintaining a 5 year effective supply at all times and in particular at the end of the Plan period.

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The responsibility to maintain a 5 year effective land supply rests with the City and Shire through their Local Development Plans and to achieve this those plans must be up-to-date and relevant. Accordingly, the opportunity should be taken in the light of the most recent household projections to review the housing requirement and allocate additional sites as is clearly necessary.

Housing Land Supply

The Addendum also relies on the fact that the 2014 Land Audit identified a 6.2 years supply of effective land in the Aberdeen Housing Market Area. However, this falls short of the 20% flexibility suggested by SPP. It further highlights the post-5 year supply of 20,283 units in the Aberdeen Housing Market Area as justification for maintaining the status quo in terms of housing land allocations. Overall in the City and Shire the post-5 year effective supply is indicated as 24,400 dwellings.

To put this in context, the Strategic Development Plan, approved by Scottish Ministers earlier this year, sets a target of 2,500 homes per annum by 2016 increasing to 3,000 per annum by 2020. At a conservative estimate, this would suggest, a requirement for an effective land supply of 28,000 houses, some 4,000 more than the current post-5 year supply.

In failing to increase the housing land allocations, Aberdeenshire Council are relying on Aberdeen City to maintain a 5 year supply of effective housing sites at all times, particularly towards the end of the Plan period. A detailed analysis by the Grampian Housebuilders Committee of Homes for Scotland indicates that there will be a shortfall in the Aberdeenshire part of the Aberdeen Housing Market Area towards the end of the Plan period.

3 This shortfall is also evident from a broad overview. The Addendum highlights a post-5 year's effective supply in the Aberdeen Housing Market Area of 20,283 units; of this 12,482 units lie within the City with the remaining 7,801 units within the Shire part of the Aberdeen Housing Market Area. This equates to 62% and 38% respectively. By comparison the housing allowances set out in Schedule 1 of the Strategic Development Plan allocate 54% to the City and 46% to the Shire. There is, therefore, a significant imbalance that needs to be addressed. To achieve the same proportions, the post-5 year effective supply in the Shire part of the Aberdeen Housing Market Area should be 10,632 units, an increase of over 2,800 units.

The issue is further highlighted when the makeup of the post-5 year supply is considered. This currently comprises 16 sites in the City compared to 32 in the Shire. The Shire part of the Aberdeen Housing Market area covers a much greater geographic area and as such, the higher number of sites is not surprising. That said, nearly 70% of the post-5 year effective supply lying within the Shire comprises only 4 sites with Elsick new settlement accounting for over 44% of the supply. This suggests an over-reliance on a small number of sites; any difficulties in terms of servicing, could create serious problems in maintaining a 5 year supply of effective housing land at all times.

This is an issue which is replicated throughout Aberdeenshire where there is a reliance on single large sites to meet the needs of local communities. The situation is no different in Banchory where there is almost a total reliance on Hill of Banchory to satisfy future housing needs, distorting the growth of the town and limiting choice for residents.

The onus rests with Aberdeenshire Council to ensure that their LDP allocates appropriate and sufficient effective land. The Reporter to the Examination in Public into the SDP also noted that a mix of site sizes would be best to achieve the growth rates required in the plan.

3 It is accepted that additional sites will become effective as the Plan rolls forward but this will not address the issue highlighted above. It is contended that a robust assessment of all the allocated sites is required to determine their contribution to the effective land supply over the Plan period. Presently, neither the Housing Land Audit nor the Action Programme Update published in May 2014 provides that level of information nor the confidence that an effective 5 year supply at all times can be maintained throughout the Plan period.

Private Rented Sector

8 Despite earlier representations to the MIR by Sandlaw Farming highlighting the need for the LDP to address the requirements of the private rented sector, the Addendum is silent on the issue. As advised in representations on the MIR, there is only a short window of opportunity to take advantage of a unique combination of circumstances that will facilitate the provision of private rented homes as Government and financial incentives for the private rented sector will only be available for a limited period.

The Scottish Government strategy, "A Place to Stay, A Place to call Home", requires local authorities to develop a better understanding of the need for private rented housing in the overall housing supply and for this to be reflected and integrated into local housing strategies.

Aberdeenshire Council unfortunately, have not brought forward any proposal whatsoever in the LDP to encourage and facilitate the Private Rented Sector. Their approach to calculate the housing needs and demand requirements makes no reference to this sector which the Scottish Government want to encourage and grow the supply of.

The Government recognises the need to stimulate support and institutional investment within the sector, facilitated through a degree of flexibility in the planning system by local authorities, to enable private rented housing development in areas where it meets local demand. To date, the LDP process has failed to recognise this.

Meeting local demand for housing, including special needs housing and affordable housing types, is one of the MIR's main planning objectives, yet little cognisance appears to have been taken of this in the preparation of the LDP. As a consequence the LDP is not "relevant" as required by SPP and should be amended to address this issue and release sites where this specific housing requirement can be delivered.

Sandlaw Farming proposes to provide a range of housing tenures to meet local needs, including private rented and affordable housing, and recently held a two day public consultation on their proposals for Braehead, Banchory, details of which were submitted as an appendix to their MIR representations. Considerable interest and support was forthcoming for private rented housing at Braehead and a significant number of people have registered an interest in renting or buying a property at Braehead.

It is also evident from the community engagement exercise that there is a pressing need to address the qualitative deficiency in the housing land supply to fulfil the range and choice of tenure types required by the Banchory community. Slavish adherence to the quantitative aspects rather than simply having regard to the qualitative deficiencies of the supply will only ensure that the wider needs of local residents will not be met. The Plan must be inclusive by meeting the entire needs of the community.

The MIR presently ignores the points made in relation to the private rented sector and in particular the Sandlaw Farming proposal to make housing available to local people. It is imperative therefore that the demand for private rented housing is considered and appropriate provision made in the LDP.

Additional Development Sites

The additional development sites proposed in Section 5 of the Addendum will do little to address the shortfall highlighted above, particularly as only one lies within the Aberdeen Housing Market Area. Nevertheless, their inclusion is tantamount to an acceptance that additional housing land is required. However, rather than respond with a reactionary piecemeal approach a

comprehensive and robust assessment of the current land supply should be undertaken in an effort to assess the full extent of the shortfall and identify additional sites accordingly.

Summary

It is evident from the above overview that a generous supply of land, sufficient to maintain at least a 5 year supply of effective housing land at all times throughout the Plan period cannot be achieved on the basis of the currently allocated sites. The Main Issues Report and subsequent Addendum indicates a degree of complacency on the part of Aberdeenshire Council in terms of failing to allocate additional land or even consider the requirements of the private rented sector.

The most recent 2012 based household projections, albeit lower than the 2010 based projections, continue to demonstrate a higher requirement than identified in the approved Strategic Development Plan which itself was based on the 2008 projections. These are now significantly dated and the failure of Aberdeenshire Council to take cognisance of the more recent projections is entirely unacceptable in the context of the SPP requirement for plans to be "up-to-date and relevant". Aberdeenshire Council's plan will be neither.

Significant reliance is placed on the fact that a post-5 year effective housing land supply of 20,283 units has been identified in the Aberdeen Housing Market Area. However, to put this in context, if the proportions of effective land are to be the same between the City and Shire as the housing allowances in the Strategic Development Plan, there is currently a shortfall of over **2,800** units in the Shire part of the Aberdeen Housing Market Area.

This shortfall is compounded by the fact that there is an over-reliance on a small number of large sites within the Shire to satisfy the housing land supply. To remedy this additional sites require to be identified for development in the Aberdeen Housing Market Area beyond those identified in Section 5 of the Addendum which, in itself, is an acknowledgement that additional sites are required.

As highlighted through the representations in respect of the MIR, the land at Braehead is capable of early delivery and consequently contributing to the effective housing land supply and satisfying a local need. Importantly, it is capable of addressing the requirements for private rented housing, a tenure so far largely ignored by Aberdeenshire Council in the context of the MIR.

On the basis of all of the above, Sandlaw Farming contends that additional land requires to be allocated and we request, respectfully, that site Ma016 at Braehead, Banchory is allocated for residential development to help ensure an adequate supply of effective housing land at all times throughout the plan period.