



SUBMISSION No.	059
ISSUES RAISED	3
SUBMISSION DATES	

## 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](mailto: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

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 Cabardunn Development Company Ltd and Dunecht Estates relative to Land Supply & Distribution**

#### **Introduction**

In response to the Main Issues Report Cabardunn Development Company and Dunecht Estates expressed serious reservations regarding the Council's preferred land supply option. It was contended that the Local Development Plan 2016 should be allocating more sites for residential development to ensure that there is sufficient land to provide for at least a 5 year effective housing land supply at the end of the Plan period. Disappointingly, the addendum makes no additional allocations, but simply relies on more recent household projections and the 2014 Housing Land Audit to make the case for no further housing land allocations.

3 The MIR noted that completion rates for new housing were anticipated to double by 2016 and, if as expected, that trend continues the objectors, along with others, argued that it would be prudent to make adequate provision in an effort to ensure an adequate supply of housing land and avoid planning by appeal. Although the MIR noted that **“predicting the land supply situation 10 years into the future is a very difficult task”**, the representations highlighted that this was a requirement of Scottish Planning Policy and for that very reason a precautionary approach should be taken and additional sites identified to ensure that there is an adequate supply. Cabardunn and Dunecht Estates remain of the view that every effort should be made to predict the under-supply of effective land at 2021 and identify additional sites to ensure that there is at least a 5 year supply of effective land at the end of the Plan period.

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

#### **Revised Household Projections**

The revised household projections, which it is acknowledged are lower than the 2010 based projections published in June 2012, are cited in the addendum as justification for not increasing the housing allocations. However, an analysis of the more recent projections published in July 2014 indicates that the principle 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. Whilst not a significant number when split

between the housing market areas in the City and Shire it nevertheless demonstrates that if a "generous" land supply is to be provided additional allocations should be made.

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.

### **Housing Land Supply**

The Addendum further relies on the fact that the 2014 Land Audit identified a 6.2 years supply of effective housing land in the Aberdeen Housing Market Area. This, however, can hardly be described as a "generous" supply and falls short of the 20% flexibility suggested by SPP. It further highlights the post-5 year supply of 24,400 units in the City and Shire, 20,283 of which lie within the Aberdeen Housing Market Area, as justification for maintaining the status quo in terms of housing land allocations.

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. This would suggest, at a conservative estimate, a requirement for an effective land supply of at least 28,000 houses, some 4,000 houses 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. An analysis undertaken 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.

This shortfall however, 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 which requires 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 problem is further highlighted when the makeup of the post-5 year supply is considered. It 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 which, should any problems arise in terms of servicing, could have implications in terms of maintaining a 5 year supply of effective housing land at all times.

It is accepted that additional sites will become effective as the Plan rolls forward. However, a robust assessment is required of all the allocated sites 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 provide that level of information nor the confidence that an effective 5 year supply at all times can be maintained throughout the Plan period.

### **Additional Development Sites**

3/2 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 should be undertaken of the current land supply in an effort to assess the shortfall and identify additional sites accordingly.

### **Summary**

Based on the above it is contended 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.

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.

3 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 is in itself an acknowledgement that additional sites are required.