

Review of SG Housing 1: Housing Land Allocations 2007-2016

1. Introduction

- 1.1 The purpose of this paper is to examine SG Housing 1: Housing land allocations 2007-2016 in light of changes in the national policy and local context. It will consider whether it meets the requirements of Scottish Planning Policy and other national planning documents, and whether it forms a sound basis for a policy for making planning decisions on housing land allocations in Aberdeenshire in the period between 2016-2021.

2. Approach

- 2.1 The current policy states that proposals on land allocated for immediate housing development should be reserved solely or related to this purpose and gives a specific restriction on the number of houses which can be permitted, unless supported by a masterplan which has itself been through a robust process of public consultation.
- 2.2 The reasoned justification explains that this is to ensure that land allocated for housing in the ALDP to meet the Structure Plan's requirement is developed for that use to avoid any issues with erosion of the gross supply of housing land.
- 2.3 Allocated land is shown in the settlement proposal maps and further details of Housing land allocations for 2007-2016 (phase 1) are available in Schedule 1 tables 1-7. This is a logical place in the plan to find this information, and these details are included in both the supplementary guidance and the main policy itself
- 2.4 The reason justified explains that there is an estimated allowance of "up to 25%" of all development in the Rural Housing Market Area, generated under the policy for development in the countryside, that will contribute to meeting the Structure plan phase 1 requirement (2007-2016). Although this 25% is geographically un-allocated it is accounted for in table 1 and makes a numerical contribution to the total housing figures. This unallocated allowance is also found in the Aberdeen Housing Market Area, but is not accounted for. The need to account for the large number of houses built in rural areas under the rural development policies remains valid but the absence of discount in the Aberdeen Housing Market Area is an inconsistency which could be resolved.
- 2.5 The reason justification explains that site allocations in the local plan must be adhered to. Where a proposal is designed at a higher density than anticipated by the plan then only part of the site should be used to meet the allocation and the rest should remain undeveloped, with the possibility of review and inclusion at the next local plan. The intention of this is to avoid the cumulative impact of over allocation on planned infrastructure provision and give communities reassurance on the scale and rate of development that they can expect to see. Most importantly it introduces certainty for stakeholders.
- 2.6 In the reasoned justification it is stated that the overall density of any individual residential development has been estimated at approximately 30 houses to the hectare. This could be misleading, leading landowners to think that a large site can be developed at this density regardless of the allocation actually made and does not account for the loss of land to open space and infrastructure. This reference could be removed to avoid confusion
- 2.7 It is made clear that the site allocations attributed to "EH" (Existing Housing) sites are also covered by the requirements of this policy and therefore safeguarded from other

land uses. Some latitude was accepted in the transition from Aberdeenshire Local Plan to Aberdeenshire Local Development Plan over the absolute adherence to site numbers. There will be no justification for this in LDP2, and no change in the text of the plan is required.

3. Background

National context

National Planning Framework 2

- 3.1 Planning authorities are required to take the framework into account when preparing development plans and it is a material consideration when determining a planning application. National Planning Framework (NPF2) guides Scotland's development to 2030, setting out strategic development priorities to support the Scottish Government's central purpose - sustainable economic growth. NPF2 highlights Population and Households as a "Key Challenge" with Sub-national population projections to 2031 indicating strong growth in Eastern and Central Scotland with a growth of 19% in Aberdeenshire. These projections are based on extrapolation of past trends and are indicative rather than prescriptive but the planning system should reflect this, to ensure a generous supply of land for housing. (Scottish Government (2009) NPF2)

PEOPLE AND HOUSEHOLDS

- 3.2 The strong growth of population by 2031 predicted in the Aberdeenshire region combined with the fact that the number of households continues to grow requires the planning system to reflect this and "to ensure a generous supply of land for housing". A policy like SG Housing 1 ensures that the supply of housing land is contributing to future need and in this way it helps safeguard and maintain the "generous" supply of housing.
- 3.3 Housing is a key part of the "Development Strategy" within NPF2 and a main element of the "Spatial Strategy 2030" is to "encourage a sufficient supply of homes which are affordable in places where people want to live" Scottish Government (2009) pg 18. This is further elaborated under the heading Housing:
- 3.4 In line with the Scottish Government's vision SG Housing 1 helps to ensure that the ALDP will deliver housing. The policy safeguards against development of allocated housing land for other uses and stipulates that allocated numbers should only be exceeded in exceptional circumstances. The guidance also allows some flexibility in the rural housing market area where demand is lower. This helps ensure that identified need is addressed and houses are built in locations where there is demand in the right volume.

Scottish Planning Policy (SPP)

- 3.6 Scottish Planning Policy (SPP) is the statement of the Scottish Government's policy on nationally important land use planning matters. SPP was adopted in February 2010 and replaces the previous SPP3 Planning for homes. The policy will be updated before the end of 2013, currently "priorities for change" is out for consultation.
- 3.7 Housing is one of the core "subject policies" contained within SPP and the Scottish Government expects The planning system should enable the development of well designed, energy efficient, good quality housing in sustainable locations and allocate a generous supply of land to meet identified housing requirements across all tenures. (Scottish Government (2010) SPP). A "generous supply of housing land" has been allocated in schedule 1 and SG Housing 1 protects the effective supply of housing land by safeguarding against development of the land for uses other than housing

- 3.8 There is little that the policy can do to actively encourage house building and increase the rate of supply of new homes. However it is acknowledged in the reason justification that there is some built in flexibility as other policies will be used to facilitate further housing in rural market areas where demand is lower and large scale allocations are not appropriate.
- 3.9 The policy is clear that new housing on allocated sites will only be approved subject to other policies and advocates the process of master planning or design statements particularly in instances where additional development is proposed which exceeds the allocation. Along with Layout, siting and design policies this ensures that new housing is well designed.

Strategic/regional context

Draft Aberdeen City and Shire Strategic Development Plan

- 3.10 The current Aberdeen City and Shire Structure Plan (2009) will be replaced by a Aberdeen City and Shire Strategic Development Plan in June 2013. The proposed Strategic Development Plan focuses on nationally or regionally important planning issues as well as planning issues that are best dealt with in a co-ordinated manner with City and Shire Councils working together. The Plan continues to advocate a Spatial Strategy which identifies areas of strategic growth, local growth and diversification, and regeneration priority areas. The plan has clear targets which impact on Housing Land allocations

Up to 2035 at least 75% of all homes built should be in strategic growth areas and 50% of all growth should be in Aberdeen City. Local development plans, and if a applicable supplementary guidance, will use the spatial strategy to set policies and identify land for development.

- 3.11 SG Housing 1 Supports the current Structure Plan allowances and the allocations in the current ALDP. The proposed Strategic Development Plan as informed by the Housing Need and Demand Assessment outlines future housing allowances up to 2035. SG Housing 1 will need to be redrafted so that it is in support of the new Strategic Development Plan so that allocated housing land is available for development and housing allowances for the period from 2016 are safeguarded from other forms of development.

4. Drivers of change

- 4.1 Further clarity is needed to justify the unallocated but accounted for 25% rural housing market area, particularly as SG RD2: "Development in the Countryside" refers to both RHMA and AHMA.
- 4.2 A re-drafted NPP will be published at the end of 2013. Major changes in policy are not anticipated There could be some change in emphasis and possible rewording. the implications of the redrafted SPP will need to be taken account of.
- 4.3 The New Strategic Development Plan will mean SG housing 1 will need to be redrafted to take into account updated housing allowances for the period 2017-2021.
- 4.4 The issue of Scotland's current economic climate and its impact on effective housing land supply was raised the Chief Planner in 2010. This difficult climate has persisted and there are issues with mortgages, market uncertainty and difficulty with financing developments, which could have a significantly detrimental impact on the maintenance of a 5 year effective supply of housing.

5. Recommendations

- 5.1 In the reasoned justification the 25% unallocated allowance in the Rural Housing Market Area could be further clarified by drawing attention to the fact that this only applies to the Rural Housing Market area section of the housing in the countryside policy part B.
- 5.2 In the reasoned justification further clarity could be given by directly referring to LSD1: Masterplanning in order to clarify the need for a Masterplan or design statement, this avoids duplication.
- 5.3 The future of Scotland's economy is unpredictable it is therefore recommended that SG Housing 1 retains its current flexible approach so that the changes in Scotland's economic climate can be accommodated.

6. Summary of main points

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- 6.1 This supplementary guidance addresses the main issues associated with housing land allocation for the period 2007-2016. Subject to other policies it helps support Policy 5 and the accompanying schedules by safeguarding allocated land from other forms of development as well as protecting areas from over development. The policy will need to be redrafted for the next local plan so that it supports the new Strategic Development Plan. Further modifications may need to be made if the redrafted SSP or NPF 3 propose any changes to housing land allocations particularly in light of a challenging economic climate for house builders. Some minor re-wording may be required to the reasoned justification to enhance the overall clarity of the policy.

References

Aberdeenshire Council (2012) *Aberdeenshire Local Development Plan 2012*

Scottish Government (2010) *Scottish Planning Policy*

Scottish Government (2009) *National Planning Framework 2*

Strategic Development Planning Authority (2009) *Aberdeen City and Shire Structure Plan*

Strategic Development Planning Authority (2012) *Proposed Aberdeen City and Shire Strategic Development Plan*