

## **Review of SG Housing 2: Housing Land Allocations 2017 to 2023 and early draw down**

### **1. Introduction**

- 1.1 The purpose of this paper is to examine SG Housing 2: Housing land allocations 2017-2023 and early draw down 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 making planning decisions on housing land allocations.

### **2. Approach**

- 2.1 SG Housing 2 covers the release of housing land in the next local plan period (phase 2) 2017-2023 to ensure that the structure plan's long term housing allowance is maintained and also to provide 'extra' allocations that could be brought forward in the current local plan period to maintain the required effective 5 year supply of housing land and to retain Aberdeenshire Council's target of a 7 year housing land supply.
- 2.2 The reasoned justification explains that the aim of the policy is to safeguard housing land to meet the structure plan requirement for 2017-2023 and that this land is shown on the settlement proposal maps. The fact that land is safeguarded from other uses could be made slightly clearer. The fourth paragraph explains "until land is released through this mechanism", presumably referring to early draw down and goes onto explain all applications for development will be refused (unless temporary) so that the provision of housing will not be interfered with. Further clarification could be added within the SG by the better sequencing and re-phrasing of this information or alternatively a new SG could be written under safeguarding of resources and areas of search. However this should be carefully worded to make clear that the land in phase 2 cannot be brought forward until 2017 unless it is needed for early draw down.
- 2.4 The reasoned justification explains that the release of land from the 2017-2023 housing allocations will help maintain the "effective" housing land supply. Further clarification on this term is required. While a 5 year supply of effective housing land is required by the Scottish Government Aberdeenshire Council has chosen to maintain a 7 year housing supply. The 7 year supply refers to sites that are capable of being developed in years 6 and 7 they are not currently effective as they are phase 2 allocations but they are "capable" of becoming effective. This was the approach in the draft Local Development Plan and this was misinterpreted by the Scottish Government who thought that it meant Policy 5 aimed to maintain a 7 rather than 5 year effective land supply rather than identify a further 2 years that are capable of becoming effective in the short term. The SG housing 2 should therefore be reworded.
- 2.5 The reasoned justification explains that both the Action Programme and the Housing Land Audit will be used for the purposes of monitoring. If they identify an "emerging deficit" in housing land supply then applications on allocated land that further the settlement strategy of the plan will be approved, subject to other policies. There is only a statutory requirement for the Action Programme to be formally published every 2 years. Continuous updating of the Action Programme occurs. This could indicate deficits before the annual publication of the Housing Land Audit. This could be utilised to identify a more accurate picture of effective land supply.

- 2.6 The reasoned justification is somewhat confusing on the topic of which land will be drawn down from the 2017-2023 housing allocations. The policy states that it will be in line with the Structure Plan Spatial Strategy and the Settlement Strategy. This is an error and should be replaced with Spatial Strategy of the Local Development Plan.
- 2.7 The reasoned justification is clear that although larger sites may have allocations that span phases 1 and 2 and planning permission may be granted for the entire allocation. Original phasing must be adhered to unless it has been identified as early draw down. We are currently consulting with development Management and legal as to whether this can be enforced effectively through conditions.

### **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"
- 3.2 A strong growth of +19 % to the population by 2031 is predicted in the Aberdeenshire region this combined with the fact that the number of households continues to grow means that the planning system should reflect this and "to ensure a generous supply of land for housing". SG Housing 2 is concerned with land allocated for (2017-2023) it helps give an indication of where future development will be and gives larger allocations some future certainty. The policy also enables land to be drawn down and made available early to ensure Aberdeenshire Council's target of a 7 year housing land supply and a 5 year effective land supply is maintained.
- 3.3 NPF2 sets out a vision for Scotland up to 2030, provision of Housing is a key part of the "Development Strategy" and a main element of the "Spatial Strategy 2030" is to "encourage sufficient supplies of homes which are affordable in places where people want to live" Scottish Government (2009) pg 18.
- 3.4 In line with the Scottish Government's vision SG Housing 2 helps to ensure that the ALDP will deliver housing. This helps ensure that identified need is addressed and houses are built in locations where there is demand in the right volume. The policy accounts for phase 2 (2017-2023) by which time there will be a new Local Development Plan, the policy therefore ensures that housing land supply is uninterrupted and there is a long term vision for Aberdeenshire. The policy's support of future housing allocations helps support the Scottish Government's national ambition to secure a long term increase in housing land supply.

#### Scottish Planning Policy (SPP)

- 3.5 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.
- 3.6 Housing is one of the core "subject policies" contained within SPP and the Scottish Government is committed to increasing the supply of new homes and the planning system should contribute to raising the rate of new housebuilding by identifying a generous supply of land for the provision of a range of housing in the right places
- 3.7 There is little that the policy can do to actively encourage house building and increase the rate of supply of new homes. SG Housing 2 enables early draw so that the rate of build is not constrained by lack of available housing land.
- 3.8 In line with the recommendations in the SPP the effective land supply will be monitored by the Housing land Audit and the Action Programme which will identify phase 1 housing land that has become ineffective, this will act as a trigger or the early draw down of phase 2 sites.

#### Letter from Chief Planner, Providing an effective supply of land for housing

- 3.9 In October 2010 the Chief Planner acknowledged that there are serious threats to the maintenance of an effective 5 year housing land supply and the development industry is facing increasing hardship due to the current economic climate. It is asserted that in this instance "the approach to the planning and delivery of housing needs to be reconsidered". It is recommended that close monitoring of housing land supply should be conducted through the Housing Land Audit, which is advocated through SG Housing 2.
- 3.10 The Chief Planner goes onto suggest that "Development Plans should identify triggers for the release of future phases of effective sites where a 5 year effective supply is not being maintained". We need to clarify that if the Housing Land Audit identifies a less than a 5 year effective supply is unlikely to be maintained then this will trigger early draw down. Planning advice has been prepared on this topic and will be published when required.

#### Draft Aberdeen City and Shire Strategic Development Plan

- 3.11 The Current Aberdeen City and Shire Structure Plan (2009) will be replaced by an Aberdeen City and Shire Strategic development Plan with a proposed date of June 2013. The 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 advocates "the Spatial Strategy" which identifies areas of strategic growth, local growth and diversification as well as 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

- Local development plans and if a applicable supplementary guidance will use the spatial strategy to set policies and identify land for development
- 3.12 SG Housing 2 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.
- 3.13 SG Housing 2 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. There have been no major changes in the Proposed Strategic Development Plan and the previous numerical allowances for housing for the period 2017-2023 have been retained and extended up to 2026 which in essence allows a longer period for the same number of houses. It needs to be decided whether we would split the 2017-2016 into two phases in the next Local Development plan.

#### **4. Drivers of change**

- 4.1 SG Housing 2 needs further some clarification as to how phase 2 (2017-2023) allocations are safeguarded from other forms of development.
- 4.2 Early draw down may be required which would mean that Planning Advice would need to be published.
- 4.3 A re-drafted SPP will be published at the end of 2013. No major changes in policy approach are anticipated though there could be some change in emphasis and possible rewording. A close eye should be kept on the progress of the redrafted SPP and its possible implications which should be taken account of.
- 4.4 The New Strategic Development Plan will mean SG housing 2 will need to be redrafted for next Local Development Plan to take into account the new timescales

#### **5. Recommendations**

- 5.1 SG Housing 2 should be re-worded and re-sequenced so it is clear that all proposals other than for housing will be refused. It should not be necessary to produce a separate SG under Safe Guarding of Resources and Future Areas of Search as this could lead to unintended barriers to early draw down and an overall loss of flexibility and response to change.
- 5.2 The policy should be reworded to clarify that draw down will triggered if a 5 year effective land supply is unlikely to be maintained and that the aim is to have a 7 year housing land supply which identifies sites capable of becoming effective.
- 5.3 Elements of the draft Planning Advice could be incorporated into the reasoned justification to give further clarity to the draw down process and site selections.
- 5.4 It is difficult for the SG Housing 2 to make allowances for a poor and unpredictable economic outlook and at present SG Housing 2 takes flexible response and facilitates further release of alternative housing land to maintain an effective supply of housing. Nothing further can be done to the guidance at this stage to make anymore allowances for poor economic performance.

- 5.5 SG Housing 2 will need to be redrafted for the 2022-28 period. This is slightly out of sync with the new Strategic Development Plan Period which has allocations up to 2026 and further allocations from 2027-2035. Extending the housing period up to 2028 would not be contrary to the Strategic Development Plan and would allow further inbuilt flexibility that comes with over allocation.

## **6. Summary of main points**

- 6.1 SG Housing 2 addresses the main issues associated with housing land allocation for the period 2017-2023. Subject to other policies it helps support Policy 5 and the accompanying schedules. No major changes to the Policy are recommended as the policy is sufficiently flexible and enables early draw of phase 2 allocations assisting a 7 year housing land supply to be maintained. The policy will need to be redrafted for the next local plan so that it supports the new Strategic development plan and provides greater clarity on the draw down mechanism.

## **References**

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

*MacKinnon, J (2010) Letter from Chief Planner, Providing an effective supply of land for housing*

*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*