

Examination of Aberdeen City Proposed Local Development Plan

Homes for Scotland response to Aberdeen City Council Response to Further Information Request 08 – Issue 02 – Housing Land Supply and Policy LR1 & LR2

Introduction

- 1 Thank you for providing Homes for Scotland with an opportunity to respond to Aberdeen City Council's response to Further Information Request 08 in relation to questions 1, 3 and 7.

Question 1

- 2 Homes for Scotland considers that the planning system must be proactive, not reactive, and that Local Development Plans (LDPs) are an opportunity to deliver land for development, as well as plan for growth. The LDP must not only allocate sufficient land for new homes, but also positively enable the delivery of these homes. Therefore we would support the allocation of a generous supply of land within the Aberdeen Housing Market Area (AHMA) to ensure that enough land (of a range of site sizes) can be brought forward if other sites are failing to deliver the anticipated number of homes within the plan period. This would better maintain the required five-year housing land supply at all times, and better deliver homes that are needed across Aberdeen.
- 3 While the tables provided by Aberdeen City Council provide detail for both Aberdeen City and Aberdeenshire sections of the AHMA, the important point to consider is the delivery of these homes. Information on the number of units delivered on each site to date would be useful to show the rate of delivery of homes, not just the overall numbers and capacities.
- 4 Homes for Scotland queries the proposed rate of delivery of the largest sites – Grandhome in Aberdeen City and Chapelton in Aberdeenshire. The Council response acknowledges that these sites account for over 11,000 homes within the AHMA and are owned and managed by development companies rather than house builders. We consider that delivery on these sites will be slowed by the collaboration required between the land owner and home builders to deliver the necessary infrastructure and deliver homes on site. If the rate of delivery on these largest sites slows, there could be a significant shortfall in delivery over the Plan period, without enough of a range of other sites of varying sizes also allocated across both the Aberdeen and Aberdeenshire portions of the AHMA. Paragraph 119 of Scottish Planning Policy (SPP) states "*in allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the*

range of sites allocated will enable the housing supply target to be met". Homes for Scotland considers that more land should be allocated for housing within Aberdeen City, and that this land allows for a balance in size of sites across the AHMA.

Question 3

- 5 Aberdeen City and Shire Strategic Development Plan (SDP) 2014 does not set out a housing requirement (or housing supply target) for Aberdeenshire for the three periods of 2011-2016, 2017-2026 and 2027-2035. The SDP sets out the housing requirement in Figure 10, page 32 for the plan area as a whole, and also for the two housing market areas (HMA) covered by the plan – the Aberdeen HMA and the Rural HMA.
- 6 We understand that the Aberdeen City and Shire SDP was approved prior to the publication of Scottish Planning Policy (SPP) in 2014, and therefore was not subject to the requirements of Paragraph 118 of SPP which indicated that the SDP should set out the housing supply target and housing land requirement for the plan area, each local authority area, and each functional market area. The next SDP will be required to set the housing requirement at the whole plan level, for each local authority level, and for each housing market area within the Plan.
- 7 However, in order to determine the proportion of housing land that is required to be allocated within the Aberdeen City Council area of the Aberdeen HMA, a breakdown of housing requirement by local authority is necessary.
- 8 This is also needed for the purpose of monitoring the effective housing land supply, the planning authority's compliance with SPP paragraphs 110 and 119, and to enable the operation of the presumption in favour of development that contributes towards sustainable development as set out in SPP.
- 9 It is possible to estimate the split of the Aberdeen HMA by using information provided within the SDP. Schedule 1, Page 42 of the SDP sets out the break-down of the Housing Allowance for both the Aberdeen HMA and the Rural HMA. It also details Aberdeen City and Aberdeenshire figures. From this information it is therefore possible to determine the Housing Allowances for each planning authority area over the three time periods and in total:

Aberdeen City:

- *Existing LDP (allowances to 2016) = 16,500 units*
- *2017 – 2035 = 8,000*
- *2027 – 2035 = 7,000*
- *TOTAL = 31,500 (all within the Aberdeen HMA)*

- 10 We understand that the Housing Allowance has an element of generosity built in, and is therefore more of an equivalent to the Housing Land Requirement, however these figures would be reasonable estimates to work from.

Question 7

- 11 We agree with both the Reporter and Aberdeen City Council that Tables 3 to 8 of the Proposed LDP should refer to 'Existing to 2016' rather than 'Existing to 2026' as stated in the Proposed Plan. We also agree that it would be useful to have the figures in Columns 2, 3 and 4 of these tables added together to give the total capacity for each site.
- 12 There is an issue with the number of homes set out within the "existing to 2016" column of Tables 3-8 of the Proposed LDP when measured against projected completions within the published Aberdeen City and Aberdeenshire Housing Land Audit 2015. SPP states in Paragraph 119 that Local Development Plans should "provide for a minimum of 5 years effective land supply at all times". Therefore sites allocated within the LDP must be capable of being delivered within the plan period. Table 2 of the Proposed LDP shows that there is a shortfall in the total greenfield development allocations when compared to the SDP Allowances. If not all of the homes allocated under "Existing to 2016", or any of the other columns, are capable of being brought forward in the plan period due to constraints (as highlighted in the published 2015 Housing Land Audit) then this shortfall will be increased significantly.
- 13 This highlights an issue with the deliverability of sites within the Proposed LDP, and therefore Homes for Scotland argues that additional effective sites should be allocated to ensure that there is not a shortfall in delivery of homes across Aberdeen City, over the Plan period.