

Archibald B (Brian)

From: Archibald B (Brian)
Sent: 26 May 2016 12:15
To: claire.coutts@ryden.co.uk
Cc: Charles Church
Subject: FW: Aberdeen Local Development Plan - Further Information Request 08 - Issue 2 - Housing Land Supply and Policy LR1 & LR2
Attachments: Response to Council's comment - 25 May 2016.docx

| Tracking: | Recipient | Delivery |
|------------------|---------------------------|-----------------|
| | claire.coutts@ryden.co.uk | |
| | Charles Church | |
| | [REDACTED] | |
| | [REDACTED] | [REDACTED] |

Hello Claire

I acknowledge receipt of your response to FIR 08, this will be passed to the reporter.

Thanks
Brian Archibald

From: Claire Coutts [mailto:claire.coutts@ryden.co.uk]
Sent: 25 May 2016 11:34
To: Archibald B (Brian)
Cc: Charles Church
Subject: Aberdeen Local Development Plan - Further Information Request 08 - Issue 2 - Housing Land Supply and Policy LR1 & LR2

Brian

I refer to your email dated 11 May 2016 inviting comments on Aberdeen City Council's response to the above further information request, in relation to the housing land supply.

On behalf of Mactaggart and Mickel, please find attached our response to the Council's comments.

Persimmon Homes previously submitted a representation to the Proposed Plan on behalf of the land owner in relation to land at Rigifa, Cove (Ref. 157). Mactaggart and Mickel are now responsible for promoting that site, therefore, comments are now submitted in their name. These comments should therefore be read in conjunction with the previous submissions made by Persimmon Homes.

I trust that this is acceptable, however, please do not hesitate to contact me should you need anything further.

Kind regards
Claire

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Aberdeen Local Development Plan
Further Information Request 08
Issue 2 – Housing Land Supply and Policy LR1 and LR2

Aberdeen City Council provided their response to the Reporter's request for information on 11th May 2016. The Reporter is willing to accept responses to this from interested parties in relation to questions 1, 3 and 7.

Our client, Mactaggart and Mickel have an interest in land at Rigifa Farm, Cove, which was previously promoted by Persimmon Homes (Proposed Plan Representation Ref 157 (4)) on behalf of the landowner, Mr Ian Stephen. This land is under the control of Mactaggart and Mickel who are now responsible for promoting this land. Ryden submitted the original bid (Ref. B1304) on behalf of the landowner and have again been instructed to prepare a response to the Council's comments, on behalf of Mactaggart and Mickel. This response should be read in conjunction with those previous submissions.

Question 1

Question 1 considers the balance between large and small sites in the housing land supply and the Council were requested to provide a table showing the numbers of houses proposed on all allocated sites of over 500 houses; between 100 and 500 units; and, under 100 units. These were to be provided for sites in Aberdeen City, the Aberdeenshire portion of the Aberdeen HMA and across the housing market area as a whole. Aberdeen City Council provided the table showing sites over 500 units; between 100 and 500 units; and, under 100 units. However, these were sites in Aberdeen City only. They also provided a table of brownfield sites and those sites carried over from the 2008 Local Plan.

Much of the additional information request focuses on the location of sites and making a distinction between sites in Aberdeen City, the Aberdeenshire part of the Aberdeen HMA. Regardless of the location of these sites, there remains a shortfall in allocations when considered against the Strategic Development Plan allowances. Table 2 of the Proposed Plan highlights this shortfall, totalling 578 units in the period 2016-2035.

It should be emphasised that the Housing requirements set out in the SDP were based upon depressed population and household projections. More recent projections indicated that the anticipated population growth to 2035 was seriously underestimated and therefore, the SDP also underestimated the housing requirement over that period.

This is compounded by an analysis of the 2015 Housing Land Audit found that of the 11,834 units identified for development in the period 2007 – 2016, only 1,418 were expected to be completed. This accounts for only 12% of the required number of houses required to be delivered. Mactaggart and Mickel therefore have serious reservations regarding the Housing Land Supply and its failure to deliver the required number of houses in the LDP period. As a result, the Plan fails to meet the requirements of the approved Strategic Development Plan and Scottish Planning Policy.

The combination of the underestimated projections, the shortfall in allocations and fewer than anticipated completions, demonstrates the need to identify additional sites in the 2016 LDP, which are capable of early delivery. SPP requires plans to indicate the number of new homes to be built over the plan period and increase it **“by a margin in 10 to 20%”** in order to ensure that a generous supply of land for housing is provided. Taking the 578 shortfall identified in Table 2 and introducing a 20% margin, means an additional requirement for 4,778 units. This scale is considered necessary to

provide the required generosity, to increase the range and choice of opportunities and to create a pipeline of effective housing sites to increase overall volumes, to compensate for those sites which cannot be delivered during the Plan period.

Aberdeen City Council, in their response to Question 1, also highlight that the two largest sites, accounting for over 11,000 homes are owned and managed by development companies rather than housebuilders. These sites, by their nature, have significant infrastructure costs and will involve joint working between land owners and developers to enable their development, all of which will slow down the delivery process.

It is therefore argued that the 2016 LDP should, not only introduce additional sites, but ensure a more balanced mix of sites. The emphasis should be placed on the allocation of smaller sites under the control of a housebuilder. The land at Rigifa, Cove, (Bid Site B1304) previously promoted by Persimmon Homes (Proposed Plan Ref 157 (4)) is capable of early delivery and should be included in the 2016 LDP.

Question 3

Aberdeen City Council were asked whether it was possible to derive a housing requirement for Aberdeen City alone. Their response was that it was not possible to derive a housing supply target (SPP terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA), as the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

One of the core values of SPP is for Development Plans to be up to date and relevant. Aberdeen City Council note that SPP now requires the housing supply target to be set at the Council area level in addition to the housing market area and they state that this will be reflected in the next Strategic Development Plan.

However, it is argued that there is an opportunity for the Local Development Plan to provide this information now, which would provide a direct comparison with Schedule 1 in the Strategic Development Plan. Aberdeen City Council and Aberdeenshire Council should work together with the Strategic Development Planning Authority to provide this information to ensure the LDP is up to date and compliant with SPP.

Question 7

Aberdeen City Council confirm that the second column of Tables 3 to 8 are a record of the assumptions made in the adopted Local Development Plan as to the land that would be made available by 2016.

SPP focuses on the delivery of sustainable development and in particular, the delivery of housing in specified Plan periods. It advises that the housing supply target is a policy view of the number of homes the authority has agreed with be **delivered** in each Housing Market Area over the periods of the Development Plan and Local Housing Strategy. Plans should indicate the number of homes to be **built** over the Plan period and in allocating sites Planning Authorities should be confident that land can be brought forward for development within the Plan period and the range of sites allocated will enable the Housing Supply Target to be met.

In relation to Table 7: Development at Loirston and Cove, 1,100 homes are existing to 2016 (as amended). The analysis of the 2015 Housing Land Audit found that only 75 of these were expected

to be built. Therefore, in Cove alone, this amounts to only 7% of the required number of houses, or a shortfall of 1025 houses.

Planning authorities must ensure sites can be delivered and if that cannot be achieved, which is clearly the case in Cove, additional sites must be allocated. This is essential to ensure that there are no difficulties in delivering housing later in the Plan period.

Again, it is argued that there is a clear need to identify additional sites in the 2016 LDP which are capable of early delivery in order to meet the SDP requirements. The land at Rigifa, Cove is under the control of a developer and has no impediments to its early delivery. As such, it should be allocated in the 2016 LDP to ensure an adequate supply of houses is maintained in the Aberdeen area.