

## Archibald B (Brian)

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**From:** Archibald B (Brian)  
**Sent:** 26 May 2016 12:18  
**To:** 'Bob.Reid@hfm.co.uk'  
**Cc:** Andrew Brownrigg (ABROWNRIGG@aberdeencity.gov.uk); Donna Laing (DLaing@aberdeencity.gov.uk)  
**Subject:** FW: On behalf of John McIntosh RE: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2  
**Attachments:** ACC LDP Comment on Council Info Request 8 May 2016 for J McIntosh.doc; Housing Completions 2015 Major Sites Aberdeen + Aberdeenshire\_a.pdf

**Tracking:**

**Recipient**

**Delivery**

'Bob.Reid@hfm.co.uk'

Andrew Brownrigg  
(ABROWNRIGG@aberdeencity.gov.uk)

Donna Laing (DLaing@aberdeencity.gov.uk)

[REDACTED]

[REDACTED]

[REDACTED]

Hello Bob

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

Thanks  
Brian Archibald

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**From:** Bob Reid [mailto:Bob.Reid@hfm.co.uk]  
**Sent:** 25 May 2016 11:58  
**To:** Archibald B (Brian)  
**Cc:** Andrew Brownrigg; DLaing@aberdeencity.gov.uk  
**Subject:** On behalf of John McIntosh RE: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear Mr Archibald

Please find attached comment upon the Information Request 08 on behalf of Mr John McIntosh. The attached Housing Completions Table is referenced in our comment on the answer to Q1.

Regards

Bob Reid  
Planning Director  
Halliday Fraser Munro

**Bob Reid**  
Director of Planning



**Halliday Fraser Munro**  
Chartered Architects & Planning Consultants

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**From:** [Brian.Archibald@gov.scot](mailto:Brian.Archibald@gov.scot) [<mailto:Brian.Archibald@gov.scot>]

**Sent:** 11 May 2016 15:56

**To:** [gary.purves@knightfrank.com](mailto:gary.purves@knightfrank.com); [ian.livingstone@ryden.co.uk](mailto:ian.livingstone@ryden.co.uk); [john.findlay@ryden.co.uk](mailto:john.findlay@ryden.co.uk); [sandy.hutchison@taqaglobal.com](mailto:sandy.hutchison@taqaglobal.com); [Meabhann.Crowe@colliers.com](mailto:Meabhann.Crowe@colliers.com); [christopher.ross@barratthomes.co.uk](mailto:christopher.ross@barratthomes.co.uk); [ewan@emacplanning.co.uk](mailto:ewan@emacplanning.co.uk); [planningscotland@gladman.co.uk](mailto:planningscotland@gladman.co.uk); Christine Dalziel; [info@aberdeencivicsociety.org.uk](mailto:info@aberdeencivicsociety.org.uk); [tim.reid@urbanwilderness.co.uk](mailto:tim.reid@urbanwilderness.co.uk); [Theresa.Hunt@burnesspaull.com](mailto:Theresa.Hunt@burnesspaull.com); [n.miller@homesforscotland.com](mailto:n.miller@homesforscotland.com); Planning; [Emelda@emacplanning.co.uk](mailto:Emelda@emacplanning.co.uk); [dpope@nlplanning.com](mailto:dpope@nlplanning.com); [gary.purves@knightfrank.com](mailto:gary.purves@knightfrank.com); Bob Reid; [info@bancon.co.uk](mailto:info@bancon.co.uk); [robert.patrick@persimmonhomes.com](mailto:robert.patrick@persimmonhomes.com); [jain.mcgouldrick@persimmonhomes.com](mailto:jain.mcgouldrick@persimmonhomes.com)

**Cc:** [ABROWNRIIGG@aberdeencity.gov.uk](mailto:ABROWNRIIGG@aberdeencity.gov.uk); [DLaing@aberdeencity.gov.uk](mailto:DLaing@aberdeencity.gov.uk)

**Subject:** FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear All:

Please find attached Aberdeen Council's response to further information request 8 relating to the housing land supply. Some of this response (questions 2, 4, 5 and 6) comprises factual explanation based on existing information, and the reporter does not seek any further comment from parties on these questions. However the reporter is willing to accept any response parties may wish to make to what the council has said in relation to questions 1, 3 and 7. I would be grateful if responses could be sent to me to pass to the reporter by 5pm on 25 May 2016.

A copy of this request will be published on the DPEA website together with any responses you intend to submit.

<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=117092>

Please do not hesitate to contact me if there is anything you would like clarified.

Brian Archibald

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**From:** Archibald B (Brian)

**Sent:** 10 May 2016 16:06

**To:** Andrew Brownrigg ([ABROWNRIIGG@aberdeencity.gov.uk](mailto:ABROWNRIIGG@aberdeencity.gov.uk))

**Cc:** Donna Laing ([DLaing@aberdeencity.gov.uk](mailto:DLaing@aberdeencity.gov.uk))

**Subject:** FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Andrew

I acknowledge receipt of your response for FIR 08

Thanks  
Brian

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**From:** Andrew Brownrigg [<mailto:ABROWNRI GG@aberdeencity.gov.uk>]  
**Sent:** 10 May 2016 15:12  
**To:** Archibald B (Brian)  
**Cc:** Donna Laing  
**Subject:** ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Brian

Please find our response to Further Information Request 8 on Issue 2. I have arranged the responses underneath the individual elements of the request which are highlighted in **bold**.

### **Information requested**

- 1. In considering the balance between large sites and small sites in the housing land supply, it might be useful to consider the situation across the Aberdeen housing market area as well as in Aberdeen city in isolation. The council is requested to supply a table showing the numbers of houses proposed on allocated sites of over 500 units, of between 100 and 500 units, and of under 100 units in the (a) Aberdeen City and (b) Aberdeenshire portions of the Aberdeen housing market area, and (c) across the housing market area as a whole.**

Response

We have attached the tables as requested. However, it should be noted that many of the brownfield sites in Aberdeen do not have an actual number of units allocated to them – only if there has been consents have we stated numbers for individual sites. We have therefore shown a separate table of brownfield sites showing the OP reference, name and size. It is likely that most of these sites will be for under 100 units. Likely exceptions (because of their large size) are;

- OP13 AECC Bridge of Don
- OP105 Kincorth Academy
- OP77 Cornhill Hospital (consent now granted for 323 units - after publication of the Proposed Plan)
- OP93 Former Summerhill Academy

We have also produced a separate table of those sites carried over from the 2008 Local Plan as these do not count towards the SDP housing requirement (see also Question 6).

When considering the issue of site size, it also needs to be recognised that larger sites are often subdivided into smaller sites for individual builders. Indeed, the two largest sites (accounting for over 11,000 homes) are owned and managed by development companies rather than house builders (Elsick Development Company in Aberdeenshire and the Grandhome Trust in Aberdeen). By their very nature they will be relying on different builders to take on different phases of development. Although using a more traditional model, the third largest site (Countesswells with 3,000 homes) has also recently announced the sale of the first areas of land to other builders.

This further information request relates to houses proposed on allocated sites. It should also be noted that a broader picture of all sites will be provided in the full Established Land Supply as set out in Appendix 2 of the 2015 Housing Land Audit.

- 2. It is assumed that the housing requirement for the Aberdeen housing market area shown in figure 13 of the housing land audit 2015 is derived in some way from figure 10 of the strategic development plan. The council is asked to explain how the housing requirement for the Aberdeen housing market area in figure 13 of the housing land audit 2015 is calculated.**

Response

Yes – Figure 10 of the 2014 SDP is the source of the housing requirement. The requirement changes over the SDP periods, so the 2015 Housing Land Audit works out the requirement for the period 2015-19 by taking the average annual requirements for the two periods (2011-16 and 2017-26) and adding them together. The average annual requirement for 2011-16 is 1660.83 units and for 2017-26, the average annual requirement is 1501.7 units. Thus  $(1660.83 \times 2) + (1501.7 \times 3) = 7827$  for the period 2015 to 2019.

- 3. Is it possible to derive a housing requirement for Aberdeen City alone, as envisaged by paragraph 118 of Scottish Planning Policy (accepting that Scottish Planning Policy envisages this as a role for the strategic development plan)?**

Response

No, it is not possible to derive a housing requirement (housing supply target under SPP 2014 terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA). There is a housing land requirement effectively contained in Schedule 1 of the SDP, but not a housing requirement because the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

The Aberdeen City and Shire SDP was approved by Scottish Ministers in March 2014, prior to the publication of SPP in June 2014. There was no requirement in the earlier version of SPP to provide the housing requirement at the council area level. Guidance at that time (and to a large extent still does) focused on planning for housing at the Housing Market Area level. We note SPP now requires the housing supply target to be set at the council area level in addition to housing market area and this will be reflected in the next Strategic Development Plan

SPP is unhelpful in being silent on the matter of which housing supply target should be used to determine the adequacy of the housing land supply but, in order to be consistent with the SDP, it is clear that for the plan currently being examined it is at the HMA level.

- 4. Are the sites listed in appendix 1 table 2 of the proposed plan all either already built, effective or expected to become effective in the plan period?**

Response

All of the sites in Appendix 1 Table 2 have had consents since 2011. Many of them are already built out or are under construction or considered effective. The following sites are however, regarded as non-effective in the 2015 Housing Land Audit; Balgownie Centre (OP5) and Pittodrie Stadium (OP87). Both are regarded as having ownership constraints. The 2015 HLA indicates that both sites have planning consents and both are included as opportunity sites in the Proposed Plan. OP87 is dependent on a new stadium being built with a new stadium having planning consent (at OP59 Loirston) on page 87 of the Proposed Plan.

**5. Paragraph 2.12 of the proposed plan identifies sources for between 5,398 and 7,287 potential units on brownfield sites in the plan period. Does this take account of the potential product of the brownfield opportunity sites identified in appendix 2 and on the proposals map?**

Response

Yes.

**If not, how many units may these sites be expected to deliver by 2026? Have these sites been accounted for elsewhere in the council's housing land calculations that are before the examination?**

Response

No – we have been very careful to avoid double counting. Firstly, any sites that were considered effective in the 2011 Housing Land Audit have not been counted towards any of the SDP requirements (brownfield or greenfield) for this Plan – see also Question 6 below in respect of the greenfield sites. Neither have we double counted the figures from sites in Appendix 1 with any of the brownfield opportunity sites identified in Appendix 2. Where a consent has been granted (those sites identified in Appendix 1 Table 2) we have used that figure. Otherwise we use the range of calculations derived from the Brownfield Potential Study, but only apply them once to each site, whether they be in Appendix 1 Table 1 or Appendix 2 of the Proposed Plan, or both.

We have attached a copy of the 2011 Housing Land Audit for information. Appendix 2 contains a detailed table of the established, constrained and effective land supply 2011 for Aberdeen City. I can send a hard copy of this section by post.

**6. Paragraph 8 of the council's response as set out in the schedule 4 form indicates that sites remaining from the Aberdeen Local Plan 2008 (such as OP41 Friarsfield and OP58 Stationfields) have not been counted towards the SDP allowances. Is it the case that the product of such sites will have been accounted for under the effective or constrained land supply columns of schedule 1 of the strategic development plan?**

Response

Yes. The following greenfield sites have been carried over from the 2008 Local Plan. The figures in brackets show their status in the 2011 Housing Land Audit and therefore the number of units from each site that were included in the effective and constrained land supply columns in Schedule 1 of the SDP;

- OP28 Greenferns (120 houses constrained in the 2011 HLA)
- OP56 Cove (687 houses effective in 2011 HLA)
- OP58 Stationfields (150 houses effective in 2011 HLA)
- OP41 Friarsfield (280 houses effective in 2011 HLA)

None of the figures relating to these sites have been used to meet the housing allowances of the 2014 SDP. This is despite the fact that additional consents since 2011 at OP56 has increased the total capacity of the site by 122 units to 809 (see entries for Wellington Road, Cove Bay and Cove West in the 2015 HLA).

**7. How should the second column of tables 3 to 8 in the proposed plan be interpreted? Should this actually refer to 'Existing to 2016' and so be consistent with table 2?**

Response

Yes it should be 'Existing to 2016' – 'Existing to 2026' is an error which has been repeated from Tables 3 to 8. We would be grateful if the Reporters could rectify this.

**Is this column a record of the assumptions made in the adopted local development plan (and hence in column 5 of schedule 1 of the strategic development plan) as to the land that would be made available by 2016?**

Response

Yes. They are the same greenfield sites and numbers as those identified in Tables 5 to 10 of the 2012 Local Development Plan under the column 2007-2016. These represent the 'Existing LDP allowances to 2016' column identified in Schedule 1 of the SDP.

**Can the figures in columns 2, 3 and 4 of these tables be added together to give the total capacity for each site?**

Response

Yes. We would be happy to have a further column added to the tables if the Reporters considered it useful.

If any further information is required then please get in touch.

Regards, Andy

Andrew Brownrigg  
Team Leader (Development Plan)  
Communities, Housing and Infrastructure  
Aberdeen City Council  
Business Hub 4 Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

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Website [www.aberdeencity.gov.uk/localdevelopmentplan](http://www.aberdeencity.gov.uk/localdevelopmentplan)

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 [Aberdeen Local Development Plan Page](#)

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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Comparison of Major Housing Proposals in 2012 LDPs with outturn					
City	site	ref	2007-2016	actual at May 2015	shortfall
	Grandhome	OP12	2600	0	2600
	Dubford	OP25	550	64	486
	Stoneywood	OP24	500	88	412
	Craibstone South	OP28	750	0	750
	Rowett South	OP30	1000	0	1000
	Greenferns Landward	OP31	750	0	750
	Maidencraig SE	OP43	450	10	440
	Maidencraig NE	OP44	300	0	300
	Greenferns	OP45	600	0	600
	Countesswells	OP58	2150	20	2130
	Oldfold	OP62	400	0	400
	Loirston	OP77	1100	0	1100
	TOTALS		11150	182	10968
			percentage delivered	1.63	

	site	ref	2007-2016	actual at May 2015	shortfall
Shire	Banff	M1	140	0	140
	Banff	H1	100	0	100
	Fraserburgh	M1	350	0	350
	Fraserburgh	H1	350	40	310
	Peterhead	M1	575	0	575
	Peterhead	H1	180	0	180
	Mintlaw	M1	250	0	250
	Mintlaw	H1	300	17	283
	Ellon	M1	745	0	745
	Inverurie	M2	150	76	74
	Inverurie	M3	250	0	250
	Inverurie	H1	300	0	300
	Inverurie	H4	150	0	150
	Newmachar	M1	140	0	140
	Elsick	M1	1845	120	1725
	Laurencekirk	M1	485	0	485
	Edzell Woods	M1	150	0	150
	Inverbervie	H2	100	0	100
	TOTALS		6560	253	6307
			percentage delivered	3.86	

2009 SDP Housing Allowances to be delivered by 2012 LDPs

Aberdeen City	2007 to 2016	2017 to 2023
brownfield	4500	3000
greenfield	12000	7000
	16500	10000

	2007 to 2016	2017 - 2023
Huntly Pitcaple	300	500
Inverurie Blackburn	1000	1500
Portlethen Stonehaven	2200	2400
S of Drumlithie Laurencekirk	500	400
Peterhead Hatton	800	800
Ellon Blackdog	800	1500
Local Growth AHMA	1000	1350
Local Growth RHMA	4200	4000
TOTALS	10800	12450
(Total excluding RHMA)	6600	8450

all figures sourced from LDPs and 2015 Housing Land Audit

Aberdeen City LDP

Response from Andrew Brownrigg to Reporter's Questions

(with comments on Questions 1, 3 & 7 in blue from HFM on behalf of Mr John McIntosh in respect of his land holdings North of the Don)

---

Hello Brian

Please find our response to Further Information Request 8 on Issue 2. I have arranged the responses underneath the individual elements of the request which are highlighted in **bold**.

### **Information requested**

- 1. In considering the balance between large sites and small sites in the housing land supply, it might be useful to consider the situation across the Aberdeen housing market area as well as in Aberdeen city in isolation. The council is requested to supply a table showing the numbers of houses proposed on allocated sites of over 500 units, of between 100 and 500 units, and of under 100 units in the (a) Aberdeen City and (b) Aberdeenshire portions of the Aberdeen housing market area, and (c) across the housing market area as a whole.**

Response

We have attached the tables as requested. However, it should be noted that many of the brownfield sites in Aberdeen do not have an actual number of units allocated to them – only if there has been consents have we stated numbers for individual sites. We have therefore shown a separate table of brownfield sites showing the OP reference, name and size. It is likely that most of these sites will be for under 100 units. Likely exceptions (because of their large size) are;

- OP13 AECC Bridge of Don
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We have also produced a separate table of those sites carried over from the 2008 Local Plan as these do not count towards the SDP housing requirement (see also Question 6).

When considering the issue of site size, it also needs to be recognised that larger sites are often subdivided into smaller sites for individual builders. Indeed, the two largest sites (accounting for over 11,000 homes) are owned and managed by development companies rather than house builders (Elsick Development Company in Aberdeenshire and the Grandhome Trust in Aberdeen). By their very nature they will be relying on different builders to take on different phases of development. Although using a more traditional model, the third largest site (Countesswells with 3,000 homes) has also recently announced the sale of the first areas of land to other builders.

This further information request relates to houses proposed on allocated sites. It should also be noted that a broader picture of all sites will be provided in the full Established Land Supply as set out in Appendix 2 of the 2015 Housing Land Audit.

### Q1 Comment

A further column in the Council's attached tables would be useful showing the number of units delivered from each of these sites to date. This is very likely to show that although these sites have been allocated for some time their delivery has been slow or even non-existent. [Such a table was prepared and used for the neighbouring Aberdeenshire Draft LDP based on figures in the May 2015 Housing Land Audit. A copy is attached as it also shows the position of the major sites in Aberdeen which have been allocated since 2012, but also seen as longer term strategic land in the 2008 Aberdeen Local Plan and first mooted in the 2004 Draft Local Plan.]

If we are to galvanise a planning system that simply at present allocates land for housing, to one that actually ensures delivery of new homes, then a refined approach is required. This could open up opportunities for alternative delivery strategies; for other site to come forward if existing sites are proving more difficult to deliver within allocated timescales; and a wider spectrum of development scenarios being deployed. Whilst that may be territory for the Planning Review Panel report (imminent at time of writing) it would be unfortunate for Aberdeen to be penalised

- 2. It is assumed that the housing requirement for the Aberdeen housing market area shown in figure 13 of the housing land audit 2015 is derived in some way from figure 10 of the strategic development plan. The council is asked to explain how the housing requirement for the Aberdeen housing market area in figure 13 of the housing land audit 2015 is calculated.**

### Response

Yes – Figure 10 of the 2014 SDP is the source of the housing requirement. The requirement changes over the SDP periods, so the 2015 Housing Land Audit works out the requirement for the period 2015-19 by taking the average annual

requirements for the two periods (2011-16 and 2017-26) and adding them together. The average annual requirement for 2011-16 is 1660.83 units and for 2017-26, the average annual requirement is 1501.7 units. Thus  $(1660.83 \times 2) + (1501.7 \times 3) = 7827$  for the period 2015 to 2019.

**3. Is it possible to derive a housing requirement for Aberdeen City alone, as envisaged by paragraph 118 of Scottish Planning Policy (accepting that Scottish Planning Policy envisages this as a role for the strategic development plan)?**

Response

No, it is not possible to derive a housing requirement (housing supply target under SPP 2014 terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA). **There is a housing land requirement effectively contained in Schedule 1 of the SDP**, but not a housing requirement because the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

The Aberdeen City and Shire SDP was approved by Scottish Ministers in March 2014, prior to the publication of SPP in June 2014. There was no requirement in the earlier version of SPP to provide the housing requirement at the council area level. Guidance at that time (and to a large extent still does) focused on planning for housing at the Housing Market Area level. We note SPP now requires the housing supply target to be set at the council area level in addition to housing market area and this will be reflected in the next Strategic Development Plan

SPP is unhelpful in being silent on the matter of which housing supply target should be used to determine the adequacy of the housing land supply but, in order to be consistent with the SDP, it is clear that for the plan currently being examined it is at the HMA level.

**Q3 Comment**

We note that this response is almost identical to the response provided by Aberdeenshire Council to a similar question posed by the Reporter in their LDP Examination. We provide a parallel answer.

We understand why the Reporter has asked this question. It is no secret that we have a housing crisis in Scotland no more pressing than in the North East. This is a matter of high political concern.

In such circumstances the question being asked of planning is **not**:-

- “is the planning system to blame?”, but rather
- “what can the planning system do to help?”

In this context for the Reporter to receive a whole set of answers mired in the minutiae is not helpful.

One need only look at Schedule 1 of the current and previous SDP to see that the Housing Allowances are indeed expressed in Local Authority terms. The original formulation from 2009 Structure Plan was that the burden of providing new housing should be split 50/50 between City and Shire. This was a high level political agreement and is manifest in both the SP and subsequent SDP. This amounted to 36,000 new homes in each of the two Local Authority areas. Aberdeenshire still has an allowance of 36,000 – but the only reason that the City’s allowance has reduced is to do with the regeneration of public sector stock previously scheduled for demolition.

So, in terms of housing allowances at least there are figures we can work from being

- 2007 to 2016 -16,500;
- 2017 to 2026 – 8,000; and,
- 2027 to 2035 – 7,000.

Although those figures include for ‘generosity’ – it would have been reasonable to offer such a response, albeit caveated, to the Reporter.

All those involved in development, tend to work from the Housing Allowances.

**4. Are the sites listed in appendix 1 table 2 of the proposed plan all either already built, effective or expected to become effective in the plan period?**

Response

All of the sites in Appendix 1 Table 2 have had consents since 2011. Many of them are already built out or are under construction or considered effective. The following sites are however, regarded as non-effective in the 2015 Housing Land Audit; Balgownie Centre (OP5) and Pittodrie Stadium (OP87). Both are regarded as having ownership constraints. The 2015 HLA indicates that both sites have planning consents and both are included as opportunity sites in the Proposed Plan. OP87 is dependent on a new stadium being built with a new stadium having planning consent (at OP59 Loirston) on page 87 of the Proposed Plan.

- 5. Paragraph 2.12 of the proposed plan identifies sources for between 5,398 and 7,287 potential units on brownfield sites in the plan period. Does this take account of the potential product of the brownfield opportunity sites identified in appendix 2 and on the proposals map?**

Response

Yes.

**If not, how many units may these sites be expected to deliver by 2026? Have these sites been accounted for elsewhere in the council's housing land calculations that are before the examination?**

Response

No – we have been very careful to avoid double counting. Firstly, any sites that were considered effective in the 2011 Housing Land Audit have not been counted towards any of the SDP requirements (brownfield or greenfield) for this Plan – see also Question 6 below in respect of the greenfield sites. Neither have we double counted the figures from sites in Appendix 1 with any of the brownfield opportunity sites identified in Appendix 2. Where a consent has been granted (those sites identified in Appendix 1 Table 2) we have used that figure. Otherwise we use the range of calculations derived from the Brownfield Potential Study, but only apply them once to each site, whether they be in Appendix 1 Table 1 or Appendix 2 of the Proposed Plan, or both.

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Response

Yes. The following greenfield sites have been carried over from the 2008 Local Plan. The figures in brackets show their status in the 2011 Housing Land Audit and therefore the number of units from each site that were included in the effective and constrained land supply columns in Schedule 1 of the SDP;

- OP28 Greenferns (120 houses constrained in the 2011 HLA)
- OP56 Cove (687 houses effective in 2011 HLA)
- OP58 Stationfields (150 houses effective in 2011 HLA)
- OP41 Friarsfield (280 houses effective in 2011 HLA)

None of the figures relating to these sites have been used to meet the housing allowances of the 2014 SDP. This is despite the fact that additional consents since 2011 at OP56 has increased the total capacity of the site by 122 units to 809 (see entries for Wellington Road, Cove Bay and Cove West in the 2015 HLA).

**7. How should the second column of tables 3 to 8 in the proposed plan be interpreted? Should this actually refer to 'Existing to 2016' and so be consistent with table 2?**

Response

Yes it should be 'Existing to 2016' – 'Existing to 2026' is an error which has been repeated from Tables 3 to 8. We would be grateful if the Reporters could rectify this.

**Is this column a record of the assumptions made in the adopted local development plan (and hence in column 5 of schedule 1 of the strategic development plan) as to the land that would be made available by 2016?**

Response

Yes. They are the same greenfield sites and numbers as those identified in Tables 5 to 10 of the 2012 Local Development Plan under the column 2007-2016. These represent the 'Existing LDP allowances to 2016' column identified in Schedule 1 of the SDP.

**Can the figures in columns 2, 3 and 4 of these tables be added together to give the total capacity for each site?**

Response

Yes. We would be happy to have a further column added to the tables if the Reporters considered it useful.

## Q7 Comment

The questions have been answered and explained in detail by the planning authority. The Reporter might note that the larger sites which go to make up a significant proportion of the column 5 schedule 1 SDP figures also feature in the table we mention in response to Question 1.

If any further information is required then please get in touch.

Regards, Andy

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