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**From:** [Redacted]  
**Sent:** 18 May 2018 14:50  
**To:** Claire McArthur  
**Subject:** FW: Aberdeen City and Shire Strategic Development Plan Main Issues Report consultation response.  
**Attachments:** MIR Consultation Form Bancon Homes Ltd.pdf  
**Categories:** Blue Category

Claire McArthur  
Team Leader (Acting)  
Aberdeen City and Shire SDPA

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[www.aberdeencityandshire-sdpa.gov.uk](http://www.aberdeencityandshire-sdpa.gov.uk)

Working Days: Tuesday – Friday



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**From:** Ben Freeman [Redacted]  
**Sent:** 18 May 2018 11:55  
**To:** [Redacted]  
**Cc:** Graeme Reay [Redacted]  
**Subject:** Aberdeen City and Shire Strategic Development Plan Main Issues Report consultation response.

Please find attached commends from Bancon Homes Ltd in response to the MIR consultation.

Regards

Ben

Regards,

Ben Freeman  
Planning Manager

[Redacted]

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# Strategic Development Plan Review

## **Main Issues Report Consultation 12<sup>th</sup> March - 21<sup>st</sup> May 2018**

The Aberdeen City and Shire Strategic Development Planning Authority are currently reviewing the Strategic Development Plan for the area. Our Development Plan Scheme outlines a timetable for the review of the Plan, and also identifies where there are opportunities to participate. It is available to view at:

<http://www.aberdeencityandshire-sdpa.gov.uk/DevelopmentPlan/DevelopmentPlanSchemes.aspx>

The **Main Issues Report** is the first formal stage in the review process – it describes and invites discussion on options for future policies, as well as employment and housing land targets for the next Plan. No settled view on the content of the next Strategic Development Plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined.

**You can view a copy of the Main Issues Report on our website at:**

<http://www.aberdeencityandshire-sdpa.gov.uk/CurrentWork/CurrentConsultations.aspx>

**Copies are also available to view at all Council Offices and Libraries within the Strategic Development Plan Area.**

A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement, Housing Needs and Demand Assessment and Interim Cumulative Transport Appraisal can also be viewed on our website (by following the above link).

## How to Respond

The Main Issues Report contains a series of issues and questions on which we would like to hear your views. Please use this form to respond to these, or any other issues raised by the Main Issues Report or any other accompanying documents.

**Consultation Responses must be received by 12pm on Monday 21<sup>st</sup> May 2018**

You can make your views heard in a number of ways:

- **By Post - please return a completed version of this form to:**  
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email - please return a completed version of this form to:**  
[team@aberdeencityandshire-sdpa.gov.uk](mailto:team@aberdeencityandshire-sdpa.gov.uk)  
If you choose to fill out our online Word form, please be aware that you must download the form and save any changes before submission.

Letters and emails which do not make use of this form will also be accepted, however please make sure include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing, if you would like us to be able to contact you with any queries on your submission.

### Using your Personal Information

Information you supply to the Strategic Development Planning Authority (SDPA) by responding to this consultation will be used to prepare the next Strategic Development Plan for the area. The SDPA will not share the personal information provided in response to this consultation with other parties or organisations. The SDPA will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The SDPA Officers may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: Claire McArthur, Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

## Contact Details

<b>Name (Mr/Mrs/Miss/Ms)</b>	Mr Ben Freeman
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<b>Postcode</b>	AB31 5ZU
<b>Telephone</b>	██████████
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Please tick this box if you wish further correspondence to be directed to this address:

**If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.**

<b>Name (Mr/Mrs/Miss/Ms)</b>	
<b>Organisation (if relevant)</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	

If you wish to be added to the SDPA distribution list to be kept informed of our progress in producing the next SDP, please tick this box and provide the you wish to be added to our database (if different from above):

email

Email : \_\_\_\_\_

## Your Views

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue / Question Number:	Q2 – Spatial Strategy																
<p>The general concept of the spatial strategy is sound, and should be carried forward into the new SDP. However, there are two fundamental flaws in the analysis in the MIR, which need to be addressed at the SDP level to ensure that housing requirements are met going forwards.</p> <p>1) The assessment of the spatial strategy makes no mention of the Southern SGA corridor. It has been noted that this is because no changes are suggested by the SDPA. In particular, we have considerable concern that the Portlethen to Stonehaven part of the SGA is not and has not delivered, and more significantly, based on the current SDP housing allowances, and the most recent housing land audit, there is a considerable shortfall in projected completions compared to the allowance. By 2025 the delivery in this SGA is expected to be from a single site, which to date has delivered a tiny fraction of its previously projected completions to date (19 units last year compared to a HLA projection of 200 based on the 2013 Audit). Even if that single site does begin to deliver its projected housing numbers, a considerable shortfall will exist until 2026. It is reasonable to assume that if undelivered allocations can carry over to future plan periods, then undelivered requirements should also carry over to future plan periods – thus adding to the overall number required – and as such additional sites should be allocated in this SGA to address the failure of both the 2012 and the 2027 LDPs to deliver the housing allowances of the 2014 SDP. The table below considers all allocations in the SGA that are projected to deliver housing beyond 2021, and provides a projected annual housing delivery for the SGA in the south corridor compared to the 2014 SDP allowances. It is clear that the shortfall is significant, based upon the best case scenario of one site that has proven to be incapable of delivering anywhere near the projected numbers.</p>																	
<b>Housing Allowances and completions/projected completions in Stonehaven to Portlethen SGA 2015-2030</b>																	
	'15	'16	'17	'18	'19	'20	'21	'22	'23	'24	'25	'26	'27	'28	'29	'30	total
Total housing completions - Stonehaven to Portlethen SGA (2018 HLA figures)	86	69	49	92	97	139	167	181	205	160	150	150	150	150	150	150	2145
2014 SDP requirements	220	220	240	240	240	240	240	240	240	240	240	240	111	111	111	111	3284
<b>shortfall</b>	<b>134</b>	<b>151</b>	<b>191</b>	<b>148</b>	<b>143</b>	<b>101</b>	<b>73</b>	<b>59</b>	<b>35</b>	<b>80</b>	<b>90</b>	<b>90</b>	<b>-39</b>	<b>-39</b>	<b>-39</b>	<b>-39</b>	<b>1139</b>

- 2) The Aberdeen to Huntly SGA is assessed as being unsuitable for development until the A96 dualling project is in place. This approach is not acceptable, as reliance on an externally funded and delivered infrastructure project should not be a constraint to growth and development. Development can fund the delivery of local infrastructure to address traffic congestion issues on a local level. This will also ensure the continued economic growth of the area and thus avoid stagnation.

It is also noted that the current 2014 SDP had delayed large scale allocations in this SGA until after 2026 (4,200 units), and yet the MIR suggests that this will not be possible if 'developing most settlements in this corridor is not likely to happen until this transport infrastructure is in place'. There is no consideration or explanation given as to where these housing allowances might be transferred or met elsewhere.

It is not appropriate to simply abandon housing allowances/requirements without explanation and an alternative strategy. These allowances were based on housing needs and demands, which do not simply disappear due to the requirement to deliver a road upgrade.

It is our view that if the SDP is to specify that the Aberdeen to Huntly SGA is not considered suitable for development, then a solution to addressing the resulting shortfall in housing land allocations should also be specified, to ensure that the overriding aim of the plan for growth is maintained.

**Main Issue / Question Number:**

**Q3 – AWPR Junctions**

The Local Development Plans in Aberdeen City and Aberdeenshire are equipped to allow individual proposals for developments around AWPR Junctions to be considered on their own merits.

Other policies and statements within the plan indicate that Aberdeen City and Shire is 'open for business', but a blanket protectionist approach to the AWPR Junctions would negate the opportunity for external investment opportunities.

Before the fall in oil prices affected the industry, Aberdeenshire Council was approached about the location of a major Oil and Gas Company headquarters adjacent to the Fast Link junction of the AWPR at Stonehaven, and the Planning Service recommended that this be encouraged as a potential catalyst for further economic growth in the whole region. Whilst this opportunity did not proceed, the SDP should not be designed to resist such opportunities coming forward in the future.

It may be appropriate for LDPs to contain specific policies to guard against inappropriate development on unallocated land, that allows sufficient flexibility to assess positive proposals to be permitted.

The purpose of the AWPR is to deliver an upgraded road network to assist the economic benefit of the region. Not maximising this by utilising land at or around junctions would somewhat nullify the benefits of an improved transport link for business.

**Main Issue / Question Number:** Q5 – Economic Growth

Bancon Homes agree that an optimistic view of future economic growth should be adopted in the new plan – and that this runs contrary to the recommendation on AWPR Junction protection that might restrict positive opportunities in the future.

**Main Issue / Question Number:** Q7 – Tourism Development

Bancon Homes agrees that Aberdeen City and Shire needs to be ‘open for business’ and that a more flexible approach needs to be taken to tourist development and accommodation. The current restrictive policy position makes it near impossible to develop tourist accommodation outwith settlements, which does little to enable the exploitation of what rural Aberdeenshire has to offer to the tourist sector. Flexibility, logic and common sense needs to be employed when considering opportunities that arise through the planning process. Tourism is and will continue to be a major employer in the North East, and can contribute positively to the growing economy.

**Main Issue / Question Number:** Q10 – Housing Supply

Bancon Homes do not agree that the housing supply target should be based on the composite scenario promoted, but that the high migration scenario should be adopted. In both the 2009 and 2014 SDP processes, the growth of the population was underestimated substantially, and actual growth has generally followed the high migration scenarios.

The composite strategy proposed also includes an initial drop in house building, which is a negative approach to take, and not consistent with increasing needs and demands.

Bancon consider it appropriate to use the high migration scenario to establish the housing supply targets.

Having worked closely with Homes for Scotland in analysing the numbers, we align ourselves with the strategy promoted by them in this regard.

<b>Main Issue / Question Number:</b>	<b>Q11 – Affordable Housing</b>
<p>It is essential to assume that there will be funding available for affordable housing. By the time the plan is ready for adoption, there may be a different administration at Hollyrood, but the SDP must plan with the assumption that there will be a continued commitment to the delivery of affordable housing.</p> <p>Both Local Authorities have considerable land under their ownership that can deliver affordable housing and this should be utilised to provide additional land resource for this use.</p> <p>It is also noted that a positive SDP, which seeks economic growth across all sectors should as a result improve the affordability of mainstream housing and reduce the reliance on affordable housing. Planning for decline will achieve the opposite.</p>	

<b>Main Issue / Question Number:</b>	<b>Q12 - Generosity</b>
<p>Bancon Homes consider that generosity should be applied to the whole plan period, form 2021-2040. It is unclear exactly where the calculations in the MIR come from, but it appears that some of the generosity may also be applied to the 2016-2021 period, which is irrelevant and should not be included.</p> <p>Aligned with the alternative numbers promoted by Homes For Scotland, Bancon consider that a 20% generosity should be applied across the whole plan period as this would give a clear indication of a plan for growth.</p>	

<b>Main Issue / Question Number:</b>	<b>Q13 – Housing Allocations</b>
<p>Bancon Homes agree that the LDPs should make additional housing allocations to address the housing requirements established in the SDP. Based on the assessment carried out by Homes for Scotland, Bancon agree that these allocations should be considerably higher than in the Main Issues Report.</p>	

<b>Main Issue / Question Number:</b>	<b>Q14 – Size of new allocations</b>
<p>Bancon Homes do not consider that the SDP should set such a strict constraint on additional allocations of 100 units. While it is essential that a better range of sizes of housing allocations are provided, as the reliance on very large sites has been a failure of the 2012 and 2017 LDPs, different sizes of sites are suited to different market areas.</p> <p>The amount of affordable housing and the delivery mechanism also affect the delivery of sites.</p>	

**The deliverability of sites should be considered, and perhaps an emphasis on sites that are deemed capable of being delivered within the plan period and thus forming part of the 5 year housing land supply from the time of allocation would be more appropriate, rather than specifying a maximum number.**