

[REDACTED]

From: [REDACTED]
Sent: 22 May 2018 08:56
To: Claire McArthur
Subject: FW: Main Issues Report Consultation - Elswick Development Company
Attachments: Chapelton Turnberry MIR Response.pdf

From: Planning [REDACTED]
Sent: 21 May 2018 11:50
To: [REDACTED]
Cc: Stephanie Gray [REDACTED]
Subject: Main Issues Report Consultation - Elswick Development Company

Dear Sir/Madam,

Please find attached our response to the Aberdeen City and Shire SDP Main Issues Report Consultation, prepared on behalf of the Elswick Development Company.

I trust this response is clear, but should you have any further queries please don't hesitate to get in touch.

Kind Regards,

Luke Slattery

Turnberry

[REDACTED]

Web: www.turnberryuk.com

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Strategic Development Plan Review

Main Issues Report Consultation 12th March - 21st 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 21st 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
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.

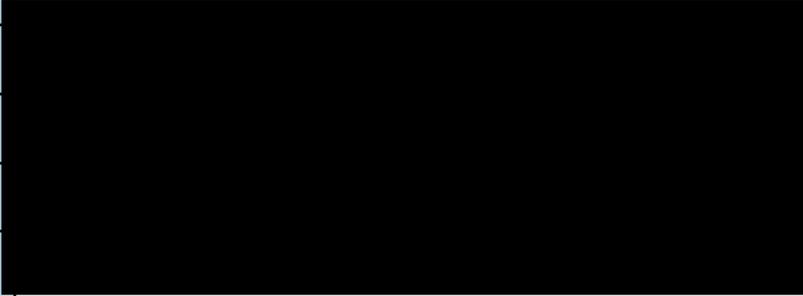
Using your Personal Information

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.

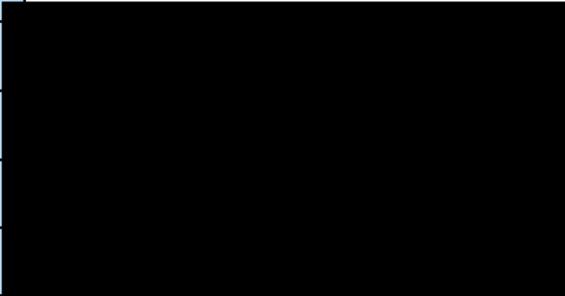
For further information on how your information is used, how the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: Claire McArthur, Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road,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

Contact Details

Name (Mr/Mrs/Miss/Ms)	Stephanie Gray	
Organisation (if relevant)	Turnberry	
Address		
Postcode		
Telephone		
Email		

Please tick this box if you wish further correspondence to be directed to this address:

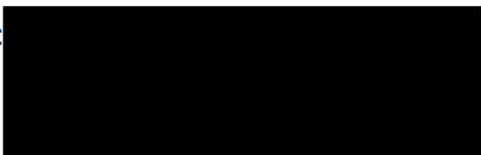
If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.

Name (Mr/Mrs/Miss/Ms)		
Organisation (if relevant)	Elsick Development Company	
Address		
Postcode		
Telephone		
Email		

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 :



Main Issue / Question Number:

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	Main Issue 1 – The Vision (Q1)
<p>We are supportive of the preferred option for the vision and agree with the precedent of promoting resilience in social and environmental issues as well as economic issues. However, the need for the Strategic Plan to direct development towards high quality place-making is essential as a strong sense of place is integral to quality of life. The Vision should be amended to include this point.</p>	

Main Issue / Question Number	Main Issue 2 – The Spatial Strategy (Q2)
<p>We agree with the Preferred Option that the existing spatial strategy, in general terms remains fit for purpose and should be carried forward.</p> <p>We note the Aberdeen to Laurencekirk growth area is not mentioned within the MIR and understand that the existing text within the MIR regarding this area will be carried forward and remain unchanged which is supported.</p>	

Main Issue / Question Number	Main Issue 3 – Aberdeen Western Peripheral Route (Q3)
<p>We are supportive of the Preferred Option outlined for Main Issue 3, and agree that speculative, off-plan development would present a threat to the Aberdeen Western Peripheral Route (AWPR), undermining its function in improving accessibility across the region. Given this, the forthcoming Strategic Development Plan (SDP) is right to emphasise that development ought to come forward via the open development plan process in both Local Authorities.</p> <p>The SDP however must be mindful of connections to and from the AWPR for committed developments which are needed for it to function effectively as a strategic link. We note that Fastlink connections at Stonehaven and Milltimber are highlighted under Section 9 of the Main Issues Report as being in place before this plan will come forward. In addition to these, the SDP should make reference to longterm Fastlink connections to support significant developments, and we request reference be made within the SDP to a longterm Fastlink connection for Chapelton which would deliver strategic transport benefits for much of the A90 corridor between Aberdeen and Stonehaven.</p>	

Main Issue / Question Number	Main Issue 5 – Economic Growth (Q5)
<p>We agree with the Preferred Option and note that the SDP must plan positively with an optimistic view of future economic growth.</p>	

Main Issue / Question Number	Main Issue 6 – Employment Land (Q6)
<p>Providing employment land can be brought forward should demand increase, we would have no objections to this suggestion.</p>	

Main Issue / Question Number:

Main Issue / Question Number	Main Issue 8 – Housing Supply Target (Q10)
We agree that the Composite Scenario which assumes recovery of demand is the best approach to the housing supply target, as it is the most robust for dealing with likely changes over the plan's lifespan.	

Main Issue / Question Number	Main Issue 9 – Affordable Housing (Q11)
We agree with the Preferred Option.	

Main Issue / Question Number	Main Issue 10 – Housing Land Requirement (Q12)
<p>We do not agree that significant generosity should be added in the early years of the plan, and the SDP should instead focus demand and therefore entice delivery, on existing allocated sites.</p> <p>Substantial investment in infrastructure has been made and continues at Chapelton. EDC is concerned that the SDPA are intending to spread demand across a wider area than is necessary. This hinders the provision of infrastructure and delays delivery in those locations where it is already planned, contrary to the principles of the respective Local Development Plans which have tried to consolidate housing growth where infrastructure provision can be maximised. There does not appear to be a shortage of allocated sites, many of which are delivering. The issue of generosity should be minimised as much as possible and possibly increased at later stages if there is evidence of a shortage.</p> <p>We also have concerns regarding the Alternative Option which suggests a 10% generosity increase throughout the SDP period.</p> <p>Poor market conditions in the Aberdeen Housing Market Area can be attributed for the lack of delivery in the short term, rather than an absence of allocations. The MIR outlines that existing effective housing land supply is at 34,602 for the period 2016-2030, and the proposed housing supply target is 31,350 for this same period. As such, the housing land requirement should be better matched with what is already planned for and unconstrained to enhance delivery instead of diluting demand by facilitating the allocation of more sites to 2030. The SDP should support both Local Authorities to progress the sites already allocated, especially given neither the Aberdeen or Rural Housing Market Area is short of a five-year (i.e. short term) supply. According to the 2017 HLA, the Aberdeen Housing Market Area has a 7.2-year supply of housing land supply, further suggesting this generosity level of 20% is excessive in the first period of the plan to 2030.</p> <p>We would suggest another alternative option from those which are proposed in the MIR: 0% generosity increased in the short terms and 10% in the long term. This approach will allow momentum to be gained on existing housing sites while providing enough flexibility to accord with Scottish Planning Policy.</p>	

Main Issue / Question Number:

Main Issue / Question Number	Main Issue 11 – Housing Land Allowances (Q13)
<p>We do not agree that the preferred option represents the most effective way of delivering the draft vision set out in the MIR.</p> <p>As expressed in Q12, for new homes to be delivered effectively, supply needs to be focused in existing allocations across both Local Authorities, in order to drive up demand, ensure development is targeted in the most sustainable locations and ensure the occupation of homes. The allowance for new allocations proposed would jeopardise this, potentially undermining the place-making agendas of both Authorities and making the delivery of homes more uncertain. In turn, development would not be concentrated enough to pay for the infrastructure investment required to make sure these new settlements constitute sustainable development, undermining the strategic vision and the planning process generally.</p> <p>The level of generosity which the proposed allowance grants, which shows the sum of the proposed allowance and the effective supply as adding 28% to the difference between the housing supply target and the housing land required (which has already been inflated 20% to the year 2030), is unwarranted given the existence of an already effective, unconstrained sites to supply of housing in strategic locations; particularly within the Aberdeen Housing Market Area. As is proposed, the SDP permits the allocation of 5,500 new homes across the region before the year 2030, including 4,200 in the AHMA, even though the existing effective supply is in excess of 3,000 homes higher than the outlined housing supply target for this period, as the MIR outlines. This is before its upscaling for the housing land requirement.</p> <p>Allowing each Local Authority to focus on the delivery of their current, sufficient allocations is the best course of action, as the Alternate Option proposes. The 'risk' outlined in the MIR, whereby the housing supply could drop below the 5-year supply mark, is considered unlikely given the 7.2-year supply in the Aberdeen HMA (2017).</p> <p>Indeed, the threat associated with new allocations would be starker and less fitting with the SDP's aims of reinforcing a sustainable, resilient and prosperous region.</p> <p>The preferred option would undermine the spatial strategy by allowing substantial allocations to come forward, threatening the effectiveness of planned and existing housing and infrastructure provision without necessarily enticing the delivery required to make these sites sustainable and meet the place making agendas of both local authorities.</p> <p>The intention of this Main Issue is to see homes delivered at a quicker pace, however we would suggest the preferred option will simply dilute demand and reduce supply, conflicting with the spatial strategy of the forthcoming SDP.</p> <p>The development of Chapelton has seen homes occupied since 2015 and development of the new community is proving resilient despite the economic situation in the region; with a steady supply of new homes and businesses. This resilience is attributable in part to the long-term nature of the development, the fact that developers are provided with serviced sites and the fact that we have multiple development partners on site. The latter of which means delivery is not reliant on one resource, but many. This coordinated and collaborative development approach brings its complexities but means Chapelton can respond quickly to market requirements.</p> <p>Chapelton requires more time for momentum to build to ensure Aberdeenshire Council's place-making agenda is realised and that the infrastructure necessary to support Chapelton and wider communities is fast-tracked as much as possible, given its sustainable location and conformity with the place-making agenda of the area. The Preferred Option would significantly undermine this agenda and also the delivery of Chapelton and other committed sites.</p> <p>The Alternative Option is a more suitable, whereby no further housing allocations should be made beyond what is already identified, thereby focussing the delivery of existing sites and supporting their success; making the other ambitions of the SDP more deliverable in turn.</p>	

Main Issue / Question Number:

Main Issue / Question Number

Transport - Q16

We agree that the next SDP should continue to identify regionally significant long-term transport projects. The 20 to 25-year lifespan of the plan makes this an essential aspect of its remit. Crucially, many of these projects will be linked to the spatial strategy and sites identified within the Strategic Growth Areas.

The AWPR will be an essential connection by the time the SDP comes forward, from which further connectivity can be realised. During the lifespan of the SDP, significant delivery will have occurred at Chapelton and its connection to Fastlink should be referenced within the SDP. This connection will be of significant benefit to the surrounding area in terms of communities located between Aberdeen and Stonehaven.

A Fastlink junction at Chapelton would be a strategic connection and the benefits of this require to be recognised by the SDP and considered in detail, in support of any future infrastructure funding.

Please also refer to our response to Main Issue 3.