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From: [REDACTED]
Sent: 22 May 2018 08:57
To: Claire McArthur
Subject: FW: Strategic Development Plan - Submission to Main Issues Report 2018
Attachments: Farningham Planning - MIR Submission - 20180521.pdf
Importance: High

From: Joanne Plant [REDACTED]
Sent: 21 May 2018 11:52
To: [REDACTED]
Cc: [REDACTED]
Subject: Strategic Development Plan - Submission to Main Issues Report 2018
Importance: High

Good morning

**Aberdeen City & Shire Strategic Development Plan – Main Issues Report 2018
Submission on behalf of Barratt North Scotland and Dunecht Estates**

On behalf of Mr Alan Farningham of Farningham Planning Ltd, please find attached a representation to the MIR for Barratt North Scotland and Dunecht Estates.

A paper copy of this submission will be issued to the Authority this evening.

Please acknowledge safe receipt of this email and attachment.

Kind regards,

Joanne Plant MRTPI
For Galbraith | [REDACTED]

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Date: 21 May 2018

Reference: K2245/Planning/ARF/CS

Aberdeen City and Shire Strategic Development Planning Authority
Woodhill House
Westburn Road
Aberdeen
AB15 5GB

By Email [REDACTED]
& Post

Dear Sirs

ABERDEEN CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN – MAIN ISSUES REPORT 2018

The following comments to the Aberdeen City and Shire Strategic Development Plan Main Issues Report 2018 are made on behalf of **Barratt North Scotland** and **Dunecht Estates**.

The responses to the questions raised in the Main Issues Report detailed below, should be read in conjunction with the comprehensive submission made on behalf of Barratt North Scotland and Dunecht Estates to the Strategic Planning Authority in July 2016.

The Vision

Q1 - Do you agree with the updated Vision, as set out in the Preferred Option?

The updated Vision as set out in the Preferred Option which is aimed at maintaining the area as an excellent place to live and work and developing its high quality of life is supported in principle. However, the nature and direction of the supporting planning strategies particularly those in relation to transport, housing, employment, education, health and community facilities will be critical if the Vision is to be achieved and delivered. Such aspects are considered and commented upon in greater detail below.

The Spatial Strategy

Q2 - Do you agree with the Preferred Option that the existing spatial strategy, in general terms, remains fit for purpose and should be carried forward?

It is not considered that the existing Spatial Strategy as it relates to Strategic Growth Areas is fit for purpose. In this respect, Westhill should be included within a Strategic Growth Area for all of the reasons stated below and also articulated in detail in the comprehensive submission made by Barratt North Scotland and Dunecht Estates in July 2016.

It is considered anomalous that although Westhill makes a strategic contribution to the economy of the North-East of Scotland, it is only allocated for local growth in the current and preferred Spatial Strategy. Unless the Spatial Strategy is changed to accommodate the quantum of growth required to facilitate the road improvements referred to below, the only form of development that will be achieved in Westhill will be piecemeal. Houses need to be allocated where they can be delivered in well-established market areas such as Westhill, as opposed to less attractive market areas such as Huntly, which simply amounts to a figurative paper exercise by the SDA. Furthermore, if sufficient levels of housing are not delivered in Westhill, then the business sector in the town will suffer. In this regard, there is a clear link between the correlation of businesses and housing in terms of sustainability.

It is important that consistent with Government policy and guidance on such matters, any future spatial strategy should focus development on places where there are not only clear opportunities to encourage people to use public transport and meet local community needs and demands, but also where there are opportunities for both public and private investment, particularly the latter, given the constraints on the former, to maintain and provide for improved supporting infrastructure in relation to transport, education, health and community facilities. The delivery of such improved supporting infrastructure through private intervention is predicated on providing the necessary quantum of housing development to generate the required level of revenue to fund the improvements, all as articulated in the proposals referred to above by Barratt North Scotland and Dunecht Estates for a significant western expansion of Westhill.

The MIR at Paragraph 4.8 highlights that Westhill continues to be attractive to the development industry but, there are significant infrastructure challenges to be overcome, particularly in respect of transport and education, if there is to be growth. The Transport section of the MIR at Paragraphs 9.5 and 9.9 also highlights the well documented capacity issues with the A944 corridor to Westhill. What the document does not provide for is any potential solutions to the transport issues which are wholly understood and acknowledged by Barratt North Scotland and Dunecht Estates. As highlighted in the response to Q3 below, the opening of the AWPR should be viewed positively to help facilitate future growth rather than being presented as being a constraint.

It simply hides behind the need to complete various transport appraisals, the outcome of which may not be known for some time and, raises questions regarding the risks of identifying a western expansion for strategic levels of growth before a realistic and deliverable transport solution is identified (Paragraph 4.9). Barratt and Dunecht are of the view that they collectively have an effective solution for Westhill now that would provide for the required quantum of development to provide for the necessary transport improvements including enhanced education provision and community leisure facilities. They would wish to actively engage with the appropriate Authorities to implement and deliver their vision of growth for the Westhill area, which would not have an adverse impact on the wider spatial strategy being promoted by the SDA and provide for much needed local infrastructural improvements through housing growth.

Aberdeen Western Peripheral Route

Q3 - Do you agree with the Preferred Option that the new plan should protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development?

It is important that the free flow of traffic and the junction capacities of the new AWPR are protected and not affected by development taking place which would have a negative effect on the road and its junctions. The need for development proposals to be transparently plan-led as opposed to a speculative, ad hoc approach is also supported in principle. In the event that the SDA does not amend its Spatial Strategy to accommodate Westhill within a Strategic Growth Area, any future plan needs to be flexible enough to accommodate well considered housing growth proposals (such as that being promoted by Barratt North Scotland and Dunecht Estates), which may not necessarily sit 'four square' with policy but, provide for significant local and wider infrastructural improvements which are in the public interest.

It is understood that the ASAM model currently being updated by NESTRANS will form the basis of the Strategic Transport Appraisal and that thereafter, a Cumulative Transport Appraisal will provide for the potential solutions to the issues identified. In this regard, it is understood that at a recent meeting held in Woodhill House, Aberdeen with Aberdeenshire and SDPA officers, it was advised that the results of the SYSTRA paramics model had been forwarded to the Council for consideration, although the report was not yet officially available. It concluded that there were predicted to be capacity issues with the various junctions onto the AWPR, but that such issues could be addressed by way of signalised junctions. It is suggested that the Barratt/ Dunecht proposals could positively contribute to such improvements in addition to providing a southern bypass for Westhill by way of a

new distributor link road off the A944 and, as a consequence, would wish to actively engage with the Authorities to explore their proposals further.

A blanket restriction on development in and around new junctions on the AWPR is too prescriptive a policy and, the opening of the AWPR should be seen as a positive opportunity, with road improvements/mitigation as appropriate being promoted at the respective junctions, to further accommodate and facilitate future growth and development rather than being presented as a constraint as currently is suggested in the MIR. In this regard, identifying Westhill as a Strategic Growth Area will help provide for the quantum of development necessary to finance a series of road improvements which will address junction capacity constraints on the AWPR and facilitate improved traffic movements in and around Westhill.

Economic Growth

Q5 - Do you agree that we should present an optimistic view of future economic growth in the new plan?

It should not be assumed that there will be a rapid return to high oil prices, while accepting that diversifying the economy will take time. Furthermore, no one is clear as to the likely impacts of Brexit. However, as per the Preferred Option, the next SDP should adopt an optimistic approach and be flexible enough to satisfactorily cope with levels of economic growth that are significantly higher than is currently being experienced. Being a strategic plan, the SDP must adopt a longer-term vision and plan for the future growth and success of the city region for the next 20 years. It must be positive in approach and tone in leading and helping to shape future growth for the city region. Without a strong focus on an ambitious and optimistic future for the city region's economy, the area will not be able to reach and sustain optimistic levels of future growth.

Sustainable Economic Growth

Q8 - Is there anything more the planning system should do to support sustainable economic growth?

Barratt North Scotland and Dunecht Estates are aligned with the position presented by Homes for Scotland in its response to the MIR in that, to support sustainable economic growth in the North-East, the SDP must plan for growth and seek to meet the housing need and demand identified in the HNDA, providing for a range of sizes and locations of new housing across the city region to allow the delivery of new homes which will support growth.

Housing Supply Target

Q10 - Do you agree that the housing supply target should be based on a composite scenario rather than directly on any of the three scenarios identified in the Housing Need and Demand Assessment?

No – Barratt North Scotland and Dunecht Estates do not support the Composite Scenario Housing Supply Target (HST) and supports the position presented by Homes for Scotland on such matters, as set out in its response to the MIR.

For the avoidance of doubt, Barratt North Scotland and Dunecht Estates propose that Scenario 3 is used by the SDPA as the basis for setting the HSTs for the new SDP as this is the most ambitious growth scenario of the HNDA and is the only scenario which maintains the ambition of the SDP.

In addition, we support the start date of 2016 for the HST, HLR and Housing Land Allowances as the base date of the HNDA. However, since this SDP's proposed date of approval is 2020, the first period of the Plan should be 2016-2032. SPP states that *"beyond year 12 and up to year 20, the strategic development plan should provide an indication of the possible scale and location of housing land, including by local development plan area"* (Paragraph 118). This means that the second plan period

would be 2032-2040. We notice that the plan periods within the MIR follow an inconsistent pattern of periods. Table 1 includes five periods, each of five years to set out the HST. Tables 4, 5 and 6 include three periods, the first from 2016-30. We do not understand why this period does not include the final 2 years of the 12-year plan period (as set out in SPP at Paragraph 118). Paragraph 6.21 suggests that it will 'safeguard' homes for the 10-year period beyond 2030. However, to comply with SPP, this should be from 2032 onwards. SPP clearly sets out the two plan periods as the first 12 years, and then beyond year 12 to year 20. For this SDP, the periods would then be 2016-2032 and 2032-2040. By splitting the periods the way the SDP has, years 11 and 12 of the plan are not appropriately dealt with as required by SPP. We suggest this is formalised in the Proposed Plan into the two periods 2016-2032 and 2033-2040 (both inclusive).

Affordable Housing

Q11 - Do you agree that we should assume continued funding for affordable housing at 2020/2021 levels from the Scottish Government for the whole of the next plan period?

Barratt North Scotland and Dunecht Estates supports the continued and increasing funding of affordable housing in the city region. It is reasonable to assume that this funding will continue for the purposes of the SDP, and while funding has increased year-on-year to date, the levels anticipated in the SDP provide a useful guide, given that the availability of funding is not confirmed on a long-term basis.

Housing Land Requirement

Q12 - Do you agree that significant generosity should be included in the early years of the plan but, for the later periods, no generosity should be added? This would be subject to review in future plans.

No – Barratt North Scotland and Dunecht Estates do not consider that the approach taken by the SDPA to include 20% generosity to 2030 and then no generosity thereafter is compliant with Scottish Planning Policy (SPP) and agree with the position presented by Homes for Scotland on such matters, all as detailed in its response to the MIR. To be clear, the opinion of Barratt North Scotland and Dunecht Estates is that the 20% generosity as included in the MIR should be extended over the plan period to 2040 to ensure that generosity is applied over the whole plan period.

Housing Land Allowances

Q13 - Do you agree that our Preferred Option should allow Local Development Plans to make some further housing allocations?

Yes – Barratt North Scotland and Dunecht Estates agree with the position presented by Homes for Scotland as set out in its response to the MIR, that further housing allowances should be made by future local development plans. In that regard, we are of the opinion that the plan should be based on the 2018 HLA given that this will be the most up-to-date evidence base available at the time.

Q14 - Do you agree that any new greenfield allocations should preferably be under 100 houses in size?

There is no rationale as advocated in Paragraph 6.25 of the MIR for restricting greenfield allocations to under 100 units in size. Equally, there is also no rationale for such sites not to be extensions of existing sites, which would generally be accepted as an efficient way of delivering cost effective shared infrastructure as opposed to standalone sites. There is a need to support a range and choice of sizes and location of sites to be allocated in the LDPs. In this regard, the SDP should not be as prescriptive as currently proposed.

Transport

Q16 - Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?

Paragraph 9.6 of the MIR advises that as part of the City Region Deal, a Strategic Transport Appraisal is being carried out to identify how the system needs to change over the next 20 to 30 years. The transport modelling for this will be calibrated when the Aberdeen Western Peripheral Route opens. Worryingly, it also states that the timing of this project means that its output will inform future plans rather than the current one which is being prepared. Such a scenario seriously questions the logic of proceeding with the current SDP, if it is severely constrained by a lack of definitive answers on transport infrastructure. Surely it would be better to delay the new plan until this vital information is available or advance the findings of the Appraisal or both, otherwise, what is the point of the current plan exercise except for expediency purposes and a desire to get a plan out before the outcomes of the 2017 Planning Bill are implemented.

Notwithstanding, the SDP should acknowledge the significance of the AWPR as a strategic transport corridor within the Spatial Strategy and make provision within the Proposed Plan to incorporate the findings of the STA once they are finalised. This would provide a clear strategy for future growth that acknowledges the importance of this development for the region.

I would be grateful if you could please acknowledge receipt in writing of this representation which is made on behalf of the following:

Barratt North Scotland,
Dunecht Estates,

Yours faithfully

Alan R Farningham
DIRECTOR