

Proposed Aberdeen City & Shire Strategic Development Plan - August 2018

Representation by Bancon Homes Ltd (Bancon)

Bancon do not have any objections to the spatial strategy set out in the Proposed Strategic Development Plan, and consider it the appropriate way forward for the North East. However, we do have some concerns about the detail contained within the Proposed Plan, which we set out below: -

Affordable Housing

Section 4 of the Proposed SDP, including tables 1 and 2, set out the requirements for affordable housing in the North east, as identified by the Housing Needs and Demands Assessment. It is noted that the requirement for affordable housing is around 35% of the overall housing requirement, and yet it acknowledges that developments will be required to deliver generally no more than 25% affordable housing, as set out clearly in Scottish Planning Policy. It is clear that in order to provide anywhere near enough affordable housing to meet the demands, there has to be a genuine focus on the delivery of sites. Scottish planning Policy has a clear theme of 'a sharp focus on delivery' throughout, and yet this again does not seem to be reflected in the proposed SDP.

Bancon therefore submit that the SDP needs to make specific mention of the key objective of a 'sharp focus on delivery' set out in Scottish Planning Policy, as a means to deliver more affordable housing.

Delivery of New Homes

Following on from the issue of delivery of affordable housing, it is imperative that the development plan facilitates the delivery of new housing – and the 25% affordable that comes with that.

Bancon are encouraged by the increase in housing allowances introduced in response to representations to the Main Issues Report, but note that these are still based on a growth scenario below the Principal Growth Forecast in the Housing Needs and Demands Assessment, which would have resulted in around 1,000 additional units than the Proposed SDP requires. Given the identified need for additional affordable housing and the importance of increased delivery of housing numbers overall, there is a logic in moving towards the High Growth Forecast to establish the housing allowances. It is therefore submitted that while the Proposed Plan marks a step in the right direction from the MIR, it still falls short of an ideal solution in this regard.

Bancon also disagree with the approach set out in paragraph 4.11, where a lesser (10%) generosity has been applied to the housing supply target. It is submitted that the 20% generosity should be applied across the whole plan period.

Bancon also remain concerned that key issues around the effectiveness of the existing housing land supply have not been considered.

Paragraph 4.15 acknowledges that a considerable proportion of current allocations are strategic allocations, and if any of those sites failed to come forward, there is a risk that the housing land supply may not be maintained.

Bancon submits that the 2018 Housing Land Audit, as with previous audits, demonstrate that even the agreed best case scenario shows this eventuality.

Table 3 in the Proposed SDP provides the 5 year effective housing land supply, and the post 5 year effective housing land supply as contributing towards the delivery of the housing requirements, but the Housing Land Audit clearly shows that the delivery of some large sites, most notably Chapelton and Grandhome, do not forecast delivery of the full allocation until after 2032. In fact, an analysis of the Housing Land Audit figures reveals houses counted in the Proposed SDP as post 5 year effective within the Aberdeen Housing Market Area totalling 4,885 units that are not expected to be delivered until after 2032. (please see appended table of completions for details)

Even these figures are based on delivery targets on large sites that the last few Housing Land Audits have demonstrated are not being achieved.

It is therefore submitted, based on evidence, that these sites will fail to come forward. While they may be deliverable within the lifetime of the SDP, the facts demonstrate a need to increase the new allocations in the 2020-2032 plan period to ensure the housing requirements for those years are met.

Bancon is in agreement that new allocations in this plan period need to be of a size that provides confidence that they can be delivered in the plan period, but question the statement in paragraph 4.17 that they should not undermine the deliverability and viability of the effective housing land supply. There is a genuine risk that protecting the market position of a very small number of large sites which are not delivering the housing expected by the LDP will result in a shortfall of housing supply. Again the examples of Chapelton and Grandhome evidence this. Chapelton delivered 19 houses in 2017, whereas the 2014 Housing Land Audit anticipated delivery for 2017 of 200 units. Reducing competition in the marketplace by relying on sites that are failing to deliver the required housing numbers will not enable the delivery of more houses.

It is noted also that the Chapelton site will deliver no affordable housing for the first 800+ units on site, which further contradicts the ambitions of the Proposed SDP. It is therefore inappropriate for the SDP to make specific reference to this site as delivering strategic housing in paragraph 3.38, when it demonstrably is not, and is anticipated, as a best case scenario, to contribute to the failure to meet the housing requirement.

Paragraph 4.19 of the Proposed SDP also states that new allocations should not be extensions to existing strategic development sites. It is submitted that table 3 in the SDP could go further to specify where development should be directed. The 2014 SDP broke down the housing allowances into specific strategic growth areas, which better informed the subsequent LDPs.

It is therefore submitted that the housing allowances for the plan period from 2020-2032 must be further increased to address both the findings of the Housing Needs and Demands Assessment and the shortfall anticipated from large strategic sites. Even as a best case scenario, based on the most recent Housing Land Audit, there is a demonstrable requirement for 4,885 more houses in the Aberdeen Housing Market Area, in addition to the allowances being around 1,000 houses less than the Principal Growth Forecast from the Housing Needs and Demands Assessment. Arguably this should be even more to reflect the historic and ongoing under delivery by large sites verses their anticipated numbers over several years, and to align more with the High Growth Forecast of the HNDA.

Strategic Growth Area: Aberdeen to Huntly

Bancon object to paragraph 3.36, which addresses the A96 dualling project. The project is being progressed to address strategic transport movements, and not to facilitate future development. It is not appropriate to put development of one of the key settlements in Aberdeenshire on hold until an outside agency addresses what should be an unrelated issue.

It is therefore submitted that if the SDP does not specify allocations in more detail than housing market/authority areas, it should not offer support or otherwise to specific developments or settlements. This should be for the LDPs to consider in detail.

LDP bids for the Inverurie area demonstrate alternative solutions to local road congestion issues that are not dependent on the A96 dualling project, and without due consideration, these should not be dismissed at a strategic level.

Bancon therefore submit that paragraph 3.36 should be removed from the SDP, and such matters be considered at the LDP stage.

