

## Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

**The period for representations will run between Monday 8 October - Monday 17 December 2018**

<b>Name</b>	[REDACTED]
<b>Organisation (optional)</b>	Wardrop Strategic Planning Limited
<b>On behalf of (if relevant)</b>	Taylor Wimpey (East Scotland) Limited
<b>Address</b>	Cupar Business Centre, East Road, Cupar
<b>Postcode</b>	KY15 4SX
<b>Telephone (optional)</b>	[REDACTED]
<b>E-mail (optional)</b>	[REDACTED]

What is your preferred method of communication: email

<b>What document are you commenting on?</b>	Proposed Strategic Development Plan <input type="checkbox"/>		
<b>Issue</b>		<b>Paragraph(s)</b>	
<b>Delivery of New Homes</b>		<b>Paragraphs 4.9-4.10 and Table 1: Housing Supply Target</b>	

### **What would you like to say about the issue?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Scottish Planning Policy (paragraph 115) requires that plans should set the housing supply target “**based on evidence from the HNDA**”. Also, plans should “**properly reflect the HNDA estimate of housing demand in the market sector, and, should be supported by compelling evidence**”. Whilst it is acknowledged that the housing supply target is a policy view of the number of homes to be delivered, Taylor Wimpey does not consider that the chosen Modified Principal HNDA Scenario properly reflects the HNDA, and furthermore does not consider that adequate compelling evidence has been provided within the Proposed Plan, or accompanying Housing Methodology Paper to support such divergence from the HNDA scenario.

Taylor Wimpey supports the High Migration HNDA Scenario as the most ambitious growth scenario provided by the HNDA, and requests that the housing supply targets and housing land requirements are based on this.

Taylor Wimpey does not support the Modified Principal Scenario.

In taking this position, Taylor Wimpey supports the comments set out in Homes for Scotland’s submissions to the proposed plan on this particular issue.

### **What change would you like to see made?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Housing supply targets and housing land requirements to be based on High Migration HNDA scenario.

Table 1 to be amended, as per Homes for Scotland’s response (including the use of the 85% / 15% Aberdeen HMA / Rural HMA split).

**Please return the completed form and any additional papers:**

- **By Post :**  
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email :** [team@aberdeencityandshire-sdpa.gov.uk](mailto:team@aberdeencityandshire-sdpa.gov.uk)

If you wish to fill out a Word form, please be aware that you must email the above address for a copy of the form. Please save any changes before submission.

**Please ensure all representations are with us by midnight Monday 17 December 2018.**

Thank you. For more information, please visit [www.aberdeencityandshire-sdpa.gov.uk](http://www.aberdeencityandshire-sdpa.gov.uk) or contact the Strategic Development Planning Authority on 01467 539734.

**Privacy Notice****Why does the SDPA need your information?**

As part of the review of the Strategic Development Plan, the Strategic Development Planning Authority (SDPA) is obliged by the Town and Country Planning (Scotland) Act 1997 and Town and Country Planning (Development Planning) (Scotland) Regulations 2008 to consult on a Proposed Strategic Development Plan and Proposed Action Programme. The Environmental Assessment (Scotland) Act also requires us to consult on a Strategic Environmental Assessment Environmental Report.

If you choose to respond to the consultation on any of the above documents, or the associated documents which support them, then you must submit your name and address in order to ensure that your representation can be considered valid. This is because we are required by the legislation noted above to contact you in relation to your response.

By submitting a response to the consultation you understand that the SDPA will use the information contained in your response, including your personal data, as part of the review of the Aberdeen City and Shire Strategic Development Plan. This will include consultation on the Proposed Plan (including any subsequent Proposed Plan as Modified), but also the Examination of the Proposed Plan and its eventual approval.

Any personal information that you provide in response to this consultation will be jointly held by both Aberdeen City Council and Aberdeenshire Council on behalf of the SDPA. Aberdeen City Council and Aberdeenshire Council will therefore be the Joint Data Controllers for your information. This is because the SDPA is a partnership organisation made up of both Councils.

Following the end of the consultation, i.e. after 17 December 2018, your name and respondent identification number (provided to you by the SDPA on receipt of your submission) will be published alongside a copy of your completed response on the SDPA website.

Your name, respondent identification number and a copy of your response will be retained on the SDPA website until a decision on the approval of the Proposed Strategic Development Plan has been made by Scottish Ministers. This decision is currently expected sometime in 2019. Once a decision on the Proposed Plan is made by Scottish Ministers, your name, respondent identification number and response will be removed from the SDPA website.

Other personal contact details associated with your response; such as postal address, telephone number and / or e-mail address will not be made public, although we will share this information with Scottish Ministers and the Scottish Government's Planning and Environmental Appeals Division (DPEA). We are obliged under the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 to issue a copy of all unresolved issues to Scottish Ministers / the DPEA when submitting the Proposed Plan for Examination in Public. Scottish Ministers / the DPEA then have a statutory requirement to contact respondents via The Town and Country Planning (Scotland) Act 1997, which again makes it necessary for us to provide your response and preferred method of contact to them. Should the DPEA request further information from you then they may subsequently publish that information on the DPEA website.

The SDPA will only keep your personal data for as long as is needed. The SDPA will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years the SDPA will review whether it is necessary to continue to retain your information for a longer period.

### **Your Data, Your Rights**

You've got legal rights about the way the SDPA handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that the SDPA or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- Mr Fraser Bell, Data Protection Officer, Aberdeen City Council, Legal and Democratic Services, Level 1 South, Marischal College, Aberdeen, AB10 1AU.
- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

## Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

**The period for representations will run between Monday 8 October - Monday 17 December 2018**

<b>Name</b>	[REDACTED]
<b>Organisation (optional)</b>	Wardrop Strategic Planning Limited
<b>On behalf of (if relevant)</b>	Taylor Wimpey (East Scotland) Limited
<b>Address</b>	Cupar Business Centre, East Road, Cupar
<b>Postcode</b>	KY15 4SX
<b>Telephone (optional)</b>	[REDACTED]
<b>E-mail (optional)</b>	[REDACTED]

What is your preferred method of communication: email

<b>What document are you commenting on?</b>	Proposed Strategic Development Plan <input type="checkbox"/>		
<b>Issue</b>		<b>Paragraph(s)</b>	
<b>Delivery of New Homes</b>		<b>4.11 – 4.13 and Table 2: Housing Land Requirement</b>	

**What would you like to say about the issue?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Taylor Wimpey supports the proposed generosity margin of 20% for the plan period from 2016 – 2032. This is in line with Scottish Planning Policy which requires the housing supply target to be increased by a margin of 10 to 20%, with the exact extent of the margin being dependent on local circumstances.

For the final period of the plan from 2033-2040, Taylor Wimpey would argue that a more ambitious approach to planning for housing would be to carry on the 20% generosity margin from the first period, to ensure a generous supply of land is available for housing in the later stage of the Plan as well as the earlier years.

In taking this position, Taylor Wimpey supports the more detailed response from Homes for Scotland on this issue.

**What change would you like to see made?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Extend the 20% generosity margin for period 2033-2040 and for Table 2 to be amended accordingly. In this the amended table 2 provided by Homes for Scotland, which also includes the High Migration Scenario and the 85% / 15% AHMA | RHMA split is endorsed.

**ABERDEEN  
CITY AND  
SHIRE**

*Strategic Development  
Planning Authority*

## Proposed Aberdeen City & Shire Strategic Development Plan Representation Form

Please use this form to make comments on the Proposed Aberdeen City & Shire Strategic Development Plan, ensuring that your comments relate to a specific issue in either the Proposed Plan, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

**The period for representations will run between Monday 8 October - Monday 17 December 2018**

<b>Name</b>	[REDACTED]
<b>Organisation (optional)</b>	Wardrop Strategic Planning Limited
<b>On behalf of (if relevant)</b>	Taylor Wimpey (East Scotland) Limited
<b>Address</b>	Cupar Business Centre, East Road, Cupar
<b>Postcode</b>	KY15 4SX
<b>Telephone (optional)</b>	[REDACTED]
<b>E-mail (optional)</b>	[REDACTED]

What is your preferred method of communication: email

<b>What document are you commenting on?</b>	Proposed Strategic Development Plan <input type="checkbox"/>		
<b>Issue</b>		<b>Paragraphs 4.14-4.21 and Table 3: Housing Allowances</b>	
<b>Delivery of New Homes</b>			



**What would you like to say about the issue?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

Taylor Wimpey are unclear on how the LDP allowances have been calculated by the SDPA. Taylor Wimpey consider that the SDPA's approach leads to the artificially high Effective Land Supply total which results in lower LDP allowances.

Taylor Wimpey considers that the Housing Methodology Paper supports a further increase in the Aberdeen / Rural HMAs split to 85% / 15%.

In taking these positions, Taylor Wimpey support the more detailed comments on these issues made in Homes for Scotland's response to the proposed plan.

**What change would you like to see made?**

*(if you would like to write more than the box allows then please attach this form to any additional papers)*

The Housing Methodology Paper should be used as the basis for the Housing Land Requirement and therefore the LDP housing allowance(s). From this, the High Migration Scenario can apply with Table 3 modified accordingly.

The 85% / 15% Aberdeen / Rural HMA split should be applied with Tables 1, 2 and 3 amended accordingly.

From this, and given that new allocations will indeed be required, Taylor Wimpey seek the deletion of the following test which currently states ***“As such, it is possible no further housing land allocations could be made for the next LDP”***

**ABERDEEN  
CITY AND  
SHIRE**

*Strategic Development  
Planning Authority*