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

By Email (team@aberdeencityandshire-sdpa.gov.uk) & Post

For the attention of [REDACTED]

Dear Sirs

ABERDEEN CITY AND SHIRE STRATEGIC DEVELOPMENT PLAN – PROPOSED PLAN 2018

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

They should be read in conjunction with the comprehensive submission made on behalf of Barratt North Scotland and Dunecht Estates to the Strategic Development Planning Authority in July 2016 which presented a robust and detailed case for conferring Strategic Growth Area status on Westhill within the new Strategic Development Plan.

At the outset, it is noted that although Westhill is strategically located on the cusp of the Aberdeen City and Aberdeen to Huntly Strategic Growth Areas, it has not been given Strategic Growth Area status in the Proposed Plan but is included within a Local Growth and Diversification Area as articulated on **Figure 1**.

Given the strategic contribution that Westhill makes to the economy of the North-East of Scotland, this is considered to be an opportunity missed, particularly as a major strategic expansion to the west of Westhill as proposed, would meet and satisfy the general objectives of the **Proposed Plan** as articulated in **Paragraph 2.3** and, the specific objectives for Strategic Growth Areas articulated in **Paragraphs 3.10, 3.11 and 3.12** of the **Proposed Plan** in terms of providing for well-connected sustainable homes and job opportunities supported by appropriate and improved levels of services and facilities including primary and secondary school provision, recreation, water supply and waste water systems; protecting and enhancing historic, natural and cultural heritage assets including linking habitats and open spaces through existing and improved green infrastructure and networks and implementing new planting; helping to create sustainable mixed communities and provide associated infrastructure meeting the highest standards of placemaking and design; and, making the most efficient and effective use of the transport network to provide for sustainable options and choices including walking, cycling and public transport.

If strictly applied, the Local Growth and Diversification Area status will not provide for the quantum of growth required to facilitate the significant road improvements needed to support future development in Westhill and will lead to only piecemeal growth. 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. **Paragraph 3.12** requires Strategic Growth Areas to specifically 'focus' on creating sustainable mixed communities with the services, facilities and **infrastructure** necessary for the 21st century. This includes improvements to roads, bus networks and active travel. Without a specific 'focus' on improvement(s) to the A944/B9119 corridor within the Plan, there is a very real danger that this will not be realised within its lifecycle. The current Spatial Strategy was approved in the 2009 Structure Plan and, in the past

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decade, the capacity of this vital link to one of Aberdeenshire's major settlements and economic locations has been disregarded. If the route/corridor to Westhill is not given the Strategic Growth Area focus that it deserves, there is little in the Plan that specifically aims to address transport links within the area. In this regard, **Barratt North Scotland and Dunecht Estates** would propose that either the Aberdeen City Strategic Growth Area boundary is extended along the A944 to encompass Westhill and Elrick or, the A944 corridor is recognised as a standalone western Strategic Growth Area.

Encouraging sustainable mixed communities and economic growth within the Local Growth and Diversification Areas and focusing new investment and housing in, or as an extension to, specific larger towns which are well served by public transport such as Westhill, all as detailed in **Paragraphs 3.45 and 3.46** of the Proposed Plan is supported. Support is also given to the flexibility provided in **Paragraph 3.47** which allows for development proposals in Local Growth and Diversification Areas to come forward which meet more than local needs subject to justification against the aims, strategy and targets of the Plan. It is however recommended that, should Westhill not be included within a Strategic Growth Area as requested above, **Paragraph 3.47** be expanded to provide specific support for well-considered housing growth proposals in locations such as Westhill which provide for significant local and wider infrastructural improvements which are in the public interest.

With respect to housing land supply figures, Barratt North Scotland and Dunecht Estates are aligned with the position presented by Homes for Scotland in its response to the Proposed Plan which advocates that adequate/increased provision must be made to meet recognised housing needs and demand by providing for a range of sizes and locations of new housing across the City Region to allow for the delivery of new homes which will support growth.

The increased percentage split in respect of new allocations across the City Region in favour of the Aberdeen Housing Market Area from 75/25 to 80/20 is supported. However, the respondents agree with the representation made by Homes for Scotland that this should be pushed further. As set out in its *Housing Methodology Paper*, 67% of allocations within the Rural Housing Market Area are constrained by marketability and 40% of completions over the past 10-years have been on unallocated sites. Given this backdrop and the increasingly pivotal role the private sector has in the delivery of affordable housing, allocating 20% of the region's planned growth to the Rural Housing Market Area seems unrealistic, particularly when the relaxation of Aberdeenshire Council's Local Development Plan policies introduced in 2012 to promote organic growth and redevelopment of rural brownfield sites, has yielded significant contrasting results.

The recognition in **Paragraph 4.18** that some new development will need to take place on greenfield sites to help deliver the Plan's vision and future strategy for growth is recognised and supported. It is however considered that the SDP should not be so prescriptive in advocating in **Paragraph 4.19** that allocations should be 'small scale'. There is no rationale for this. There is a need to support a range and choice of sizes and location of sites to be allocated in LDPs and the SDP should recognise this.

Furthermore, **Paragraph 4.20** should be amended to require LDPs to make provision for additional Strategic Reserves for Housing for the period 2033 to 2040 in the best interests of proper future planning and to help provide for greater flexibility and deliverability, not just simply leave it as a matter of choice. The Plan needs to provide direction on such matters.

As highlighted in the Committee Report to the respective Councils in September 2018, it is understood that although the Strategic Development Planning Authority recognises the merits of Westhill and a western expansion as a growth location, it considers Strategic Growth Area status at this time to be premature pending detailed consideration of traffic movements and patterns in both the immediate and wider area, post opening of the AWPR.

In this regard, the Proposed Plan in **Chapter 8** under 'Monitoring and Reviewing this Plan', specifically **Paragraph 8.7**, allows for a review early in the Plan period, (i.e. within the next five

years) as to whether new locations for growth should be designated, for example, *"in the corridor west of Aberdeen"* which includes Westhill.

This element of the Proposed Plan is supported subject to the reference to *"for example"* being deleted; *"the corridor west of Aberdeen"* being extended to specifically include and refer to Westhill; and, there being a firm commitment to such a review being commenced within an absolute 'maximum' period of 5 years.

Notwithstanding the respondents' support in principle for a Spatial Strategy Review contained in **Paragraph 8.7**, with suggested amendments as detailed above, it is considered that it falls seriously short in terms of commitment in that, although there is reference to a range of studies being undertaken including the *"Impact of the AWPR on travel patterns across the City Region"*, there is nothing specifically referenced in the Proposed Action Programme 2018.

It is therefore considered that there needs to be a firm commitment in the Plan's accompanying Action Programme, all as set out above, in order to ensure there is a clear timescale and delivery programme attached to not only reviewing the extent and nature of the Strategic Growth Areas, but also the accompanying studies which will form an integral part and significant influence on any such Review.

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

- Barratt North Scotland, Blairton House, Old Aberdeen Road, Balmedie, Aberdeenshire, AB23 8SH
- Dunecht Estates, Estates Office, Westhill, Aberdeenshire, AB32 7AW

