

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

Name	[REDACTED]
Organisation (optional)	Barratt North Scotland
On behalf of (if relevant)	
Address	Blairton House Old Aberdeen Road Balmedie Aberdeenshire
Postcode	AB23 8SH
Telephone (optional)	[REDACTED]
E-mail (optional)	[REDACTED]

What is your preferred method of communication: Email

What document are you commenting on?	Proposed Strategic Development Plan	X
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Issue BNS Issue 1: Spatial Strategy	Issue 3. Our Spatial Strategy <ul style="list-style-type: none"> ➢ Strategic Growth Areas ➢ SGA - Aberdeen to Peterhead ➢ SGA - Aberdeen to Laurencekirk 	Paragraph(s) Paragraph 3.14 Paragraph 3.31 Paragraph 3.38

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)

Paragraph 3.3 of the Proposed Plan acknowledges that the spatial strategy within the Proposed Strategic Development Plan (SDP) was developed for the Aberdeen City and Shire Structure Plan in 2009, then carried forward into the SDP in 2014, and is continued by this new SDP. We support the spatial strategy, however believe that it should be updated from the 2009 and 2014 position to ensure that it is fit for purpose for the next SDP looking forward to 2040, particularly in terms of the strategic importance of the A944 corridor from Aberdeen to Westhill in terms of infrastructure and housing investment to mirror and keep apace of the successful employment growth within the corridor.

We acknowledge the positive opportunity that the AWPR will bring to the City Region, and do not consider that the SDP should completely rule out any development next to the AWPR within this Plan. As such, we support a change to paragraph 3.14 of the Proposed Plan to remove reference to resisting new development adjacent to the AWPR.

Echoing Homes for Scotland (HfS), Barratt North Scotland (BNS) acknowledges the positive opportunity that the AWPR will bring to the City Region, and does not consider that the SDP should completely rule out any development next to the AWPR within this Plan. As such, we support a change to paragraph 3.14 of the Proposed Plan to remove reference to resisting new development adjacent to the AWPR.

Aberdeen – Peterhead Strategic Growth Area

Barratt North Scotland particularly welcome and support the recognition in para 3.31 that ‘it will also be important to consider any further opportunities for development at Ellon following the opening of the Aberdeen Western Peripheral Route and the A90 Balmedie to Tipperty dual carriageway’, but consider that the Energetica corridor as a whole should be examined to assess the potential opportunities it can unlock from both these dual carriageway improvements and the new junction to the AWPR, which increases the accessibility and connectivity of this corridor more than ever.

Aberdeen to Laurencekirk Strategic Growth Area

In terms of the Aberdeen to Laurencekirk Strategic Growth Area, we believe that undue weight is given to Chapelton as the only significant development in this corridor in the lifetime of the new plan. Including the statement that Chapelton ‘has the potential to set a new placemaking standard for future development in Aberdeen City and Aberdeenshire and beyond’ in the SDP is dangerous and detrimental to the successful delivery of housing in the region.

Viability: Whilst Chapelton sets high placemaking standards, this is a unique and bespoke development on a large scale which comes at a cost. The requirements for materials, whilst desirable - cast iron downpipes, granite setts, working chimneys ([Zero C Chapelton brochure](#)) come at a high financial cost, which raises the cost of build which, in turn impacts the affordability and thus the market for these homes for the wider market.

Deliverability: Chapelton has not delivered new housing at the rate it was proposed to from day one. The 2012 Aberdeenshire Local Development Plan (LDP) allocated this site alone to deliver 1,845 homes, 78% of the 2,367 allocated to this corridor in the period 2007 – 2016 ([Schedule 1, Table 6](#)). At the end of this period it had delivered 107 homes.

The 2015 Housing Land Audit (HLA) programmed delivery at Chapelton to have built up to a continuous rate of 200 units per annum by 2018. In reality development commenced with the delivery of 62 homes in 2015 (120 programmed in 2015), 45 in 2016 (150 programmed in 2015) and 19 in 2017 (170 programmed

in 2015) (source: HLAs [2015](#), [2018](#)). At the same time other new sites requiring upfront infrastructure such as Uryside phase 2 in Inverurie have delivered 231 units since 2014 (HLA Ref: G/IV/H/064) achieving 83% of the completions programmed over this period in the 2015 HLA.

In terms of the Housing Land Audit, this represents a loss of 454 units from this SGA over a three-year period alone, which could have been successfully delivered as sustainable extensions to existing settlements elsewhere within the area, alongside the requisite 25% affordable housing. In terms of the LDP, this represents a loss of 1,738 homes over the period 2007 – 2016.

The SDP sets the context for Local Development Plan (LDP) policies and– on this basis BNS feel that the statement in para. 3.38 not only promotes standards of development which are impractical for the delivery of housing on a large scale throughout the region, and would stall development to a rate which would be uneconomic for housebuilders, associated trades and the wider market. At the same time it prejudices Aberdeenshire Council's ability to revise the timing of development at Chapelton and redistribute early phase allocations accordingly, which would stimulate the provision of open market and affordable housing throughout the corridor, whilst having no impact on the continued development of Chapelton.

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)

Amend the last sentence of paragraph 3.14 to remove reference to resisting new development adjacent to the AWPR. The last sentence of paragraph 3.14 should read:

*Any new development adjacent to the Aberdeen Western Peripheral Route, including the Fastlink to Stonehaven, will be resisted unless **it is supported by** ~~has been properly considered through the Development Plan. process, and any proposals which are not identified by a Local Development Plan will generally not be supported.~~*

Amend paragraph 3.31 to read:

*Within the central and southern parts of this Strategic Growth Area it will be important to realise economic potential by embracing opportunities for tourism.
It will also be important to consider any further opportunities for development ~~at Elton~~ **within this corridor** following the opening of the Aberdeen Western Peripheral Route and the A90 Balmedie to Tippetty dual carriageway.*

Amendment the final line of paragraph 3.38 to read:

We are proposing significant new development in the northern part of this Strategic Growth Area early in the Plan period. A new settlement is already under construction at Chapelton. ~~, and this has the potential to set a new placemaking standard for future development in Aberdeen City and Aberdeenshire and beyond.~~

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

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 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

Name	[REDACTED]
Organisation (optional)	Barratt North Scotland
On behalf of (if relevant)	
Address	Blairton House Old Aberdeen Road Balmedie Aberdeenshire
Postcode	AB23 8SH
Telephone (optional)	[REDACTED]
E-mail (optional)	[REDACTED]

What is your preferred method of communication: Email

What document are you commenting on?	Proposed Strategic Development Plan	<input checked="" type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Issue BNS Issue 2: Re-evaluation of Employment Allocations	Issue 4. Our Communities <ul style="list-style-type: none"> ➢ Placemaking ➢ Delivery of New Homes 	Paragraph(s) Paragraph 4.8 Paragraph 4.18

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)

There are large areas of employment land, adjacent to traditionally buoyant employment locations, which due to policy mechanisms and strategic infrastructure – namely the AWPR, are no longer preferred locations for such uses.

In the Finalised Aberdeen Local Plan (2004) the supply of new land was seen as being vital to meeting current and future demand for sites for industrial and business use and helping ensure the future prosperity of Aberdeen City and Shire. It provided land in established employment locations in the City, where the current availability of industrial and business land was in short supply.

Since these allocations were made in 2004 employment patterns and economic drivers have shifted away from this location, with the Energetica corridor now encompassing the AWPR route through to the Aberdeen International Airport at Dyce. At Dyce the allocation and development of strategic employment land allocations have been significant and successful, anchored by the proximity to the airport and AWPR.

Similarly, the 2012 Aberdeen City LDP allocated land at Kingswells to create the phenomenally successful Prime Four Business Park, which continues to expand (in tandem with Arnhall Industrial and Business Park in Westhill). Such a strategic employment allocation was introduced in this previously undeveloped location based on its proximity to the future AWPR junction, otherwise it would not have been sustainable in the longer term.

Strategic allocations adjacent to AWPR junctions (Kingswells, Dyce, Cove (Aberdeen Gateway)) have added to the supply, allocated in 2004, which have continued throughout the 2008 Local Plans and 2012 and 2017 LDPs, with little success against an evolving employment landscape. Only small proportions of these overall historic allocations in successful pre-AWPR locations having been developed for their intended purposes, despite the infrastructure being in place to service plots, take up has been slow.

Most recently [Savills' winter 2018 Aberdeen and North East Property Market Spotlight](#) reported a 'significant oversupply across the city, extending to around 2.8m sq. ft.', which is a 'legacy of the considerable amount of new build and existing office space that was introduced to the market in 2015/2016, just as demand from oil and gas sector occupiers tailed off, following the oil price drop' (page 6). This represents a 7-year supply of existing office accommodation in the area using the steady rates of take up seen in 2017 and 2018 of circa 400,000 sq. ft.

There is no requirement for the amount of employment land in areas such as the north of Bridge of Don, and the market demonstrates this, but there is a requirement for housing land. The majority of historic employment allocations are already serviced with the necessary infrastructure and could evolve into successful mixed use developments, increasing the potential for commuting by means other than private car.

As such the SDP should recognise this and require LDPs to re-evaluate the potential of longstanding employment allocations before new greenfield allocations in the same area are made.

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)

Introduce a requirement for LDPs to re-assess longstanding employment allocations with a requirement to reallocate for alternative uses where practicable.

Amend paragraph 4.8 to read:

*4.8 Land brought forward for housing must be used efficiently, and brownfield sites and regeneration areas should be given priority. **Thereafter employment allocations that have remained undeveloped for the previous two plan cycles, or where delivery rates are now delayed or constrained should be assessed for their suitability to accommodate mixed use and residential development.** Through this process, we should create opportunities for new development that will close the gap between the wealthiest and most disadvantaged areas of the City Region. Opportunities for redeveloping brownfield sites will vary from place to place and over time but need to be a clear priority.*

Amend Paragraph 4.18 to read:

*...New allocations should consider opportunities to reuse brownfield land and attempt to utilise the current 'constrained' supply in the first instance; **and the potential to re-allocate underperforming employment allocations thereafter.** However; it is likely that some new development will need to take place on greenfield sites in order to help deliver our Vision and future strategy for growth...*

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

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 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

Name	[REDACTED]
Organisation (optional)	Barratt North Scotland
On behalf of (if relevant)	
Address	Blairton House Old Aberdeen Road Balmedie Aberdeenshire
Postcode	AB23 8SH
Telephone (optional)	[REDACTED]
E-mail (optional)	[REDACTED]

What is your preferred method of communication: Email

What document are you commenting on?	Proposed Strategic Development Plan	<input checked="" type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
Issue BNS Issue 3: Housing Supply Target	Issue 4. Our Communities > Delivery of New Homes	Paragraph(s) Paragraphs 4.9 - 4.10 Table 1: Housing Supply Target

Issue	Issue	Paragraph(s)
BNS Issue 4: Housing Land Requirement	4. Our Communities <ul style="list-style-type: none"> ➤ Delivery of New Homes 	Paragraphs 4.11-4.13 Table 2: Housing Land Requirement
BNS Issue 5: Division of Housing Allowances between Housing Market Areas	4. Our Communities <ul style="list-style-type: none"> ➤ Delivery of New Homes 	Paragraphs 4.14 - 4.21 Table 1: Housing Supply Target Table 2: Housing Land Requirement Table 3: Housing Allowances

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)

<p>BNS ISSUE 3: Housing Supply Target</p> <p>Please see Paper Apart (at the end of this document)</p> <p>BNS ISSUE 4: Housing Land Requirement</p> <p>Please see Paper Apart (at the end of this document)</p> <p>BNS ISSUE 5: Housing Allowances – Distribution between Housing Market Areas</p> <p>Please see Paper Apart (at the end of this document)</p>
--

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)

<p>BNS ISSUE 3: Housing Supply Target</p> <p>The Housing Supply Target should be based upon scenario 3 (high migration) set out in the 2017 HNDA, with Table 1: Housing Supply Target amended to reflect this.</p>

BNS ISSUE 4: Housing Land Requirement

The 20% generosity margin applied to the Housing Supply Target applied to all three plan periods, with table 2 amended to reflect this and para 4.11 modified to read:

*4.11 The Housing Land Requirement, Table 2, sets out a generous level of housing land to try and ensure that the Housing Supply Target can be met. An increase to the Housing Supply Target of 20% 'generosity' is **provided**. ~~focused on the first Plan period (to 2032) to cover the next Local Development Plans.~~ This will provide a generous land supply without compromising the viability of allocated sites or undermining existing allocations. ~~In the period 2033 to 2040 a 10% 'generosity' level has been added.~~*

Paragraph 4.17 should be deleted.

~~*It is important that the scale of these allocations does not undermine the deliverability and viability of the effective housing land supply. As such, the 2020 to 2032 period makes provision for moderate allocations, with levels increasing in the second half of the Plan period as the effective supply is delivered and additional housing land supply is required.*~~

BNS ISSUE 5: Housing Allowances – Distribution between Housing Market Areas

Housing allocations divided between the two housing market areas 85% / 15% in favour of the Aberdeen Housing Market Area, with Tables 1, 2 and 3 amended accordingly and paragraph 4.16 amended to read:

*In order to support sustainable communities, the best use of infrastructure, and increased levels of housing delivery, these allocations are divided on an ~~80% / 20%~~ **85% / 15%** basis between the Aberdeen Housing Market Area and the Rural Housing Market Area respectively.*

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

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 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

PAPER APART

BNS ISSUE 3: Housing Supply Target

4. Our Communities, Delivery of New Homes – Paragraphs 4.9-4.10 and Table 1: Housing Supply Target

WHAT CHANGE WOULD YOU LIKE TO SEE MADE:

The Housing Supply Target should be based upon scenario 3 (high migration) set out in the 2017 HNDA, with Table 1: Housing Supply Target amended to reflect this.

WHAT WOULD YOU LIKE TO SAY ABOUT THE ISSUE:

[SPP](#) (para. 115) requires that the SDP housing supply target should be ‘based on evidence from the HNDA’ and that it should ‘properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence’.

The three scenarios set out within the [HNDA \(2017\)](#) all follow a downward trajectory (fig. 28); the HNDA acknowledges that ‘in reality, given the economic challenges evidenced in earlier chapters it is more likely that with economic recovery will come an increasing need and demand over time’ (para. 4.47). The section ‘Key issues identified in the HNDA’ suggests that, as ‘the three main scenarios present different futures for the area. It may be that a composite picture more closely reflects the current position and future aspirations for the area as we move from current economic challenges to continued future prosperity’ (page 88).

The downward trajectory was a concern shared by both the SDPA and representatives of several housebuilders at a meeting held during the Main Issues Report consultation between representatives from Homes for Scotland’s Grampian Housebuilders Committee, Senior Planning Policy Managers from each Council and the SDPA (17th July 2018). The SDPA’s subsequent [Housing Methodology Paper](#) (August 2018) sets out their ‘concern that this declining trend for the number of new homes per annum does not reflect regional economic aspirations for sustainable growth (and) would also be in contrast to recent levels of new and anticipated housing completions shown in Housing Land Audits and the direction of the Regional Economic Strategy’s aspirations for a diversified regional economy and future growth’ (para. 3.11).

However whilst the SDPA solution to this issue - a *Modified Principal Scenario*, set out in the paper and used in the Proposed SDP reverses the downward trajectory of the three HNDA scenarios; over the crucial first two phases of the plan it results in a total reduction in the Housing Land Supply Target of 1,084 homes.

Whilst the Proposed SDP covers the period 2016 – 2040, the HNDA only provides projected estimates until 2035. Over this period the *Modified Principal Scenario* used in the Proposed SDP provides a total of 43,420 homes, in line with the 43,419 homes under *HNDA Scenario 1: Principal Growth*. As the *Modified Principal Scenario* follows an upward trajectory, higher housing allocations are achieved in the final period (2,340 per annum, as opposed to 1,905 in the *Principal Scenario*). The HNDA advises that the ‘figures for the last five years of the plan period (2036-2040) will be produced by extrapolating from the earlier data’. The difference in the aforementioned 2035 housing figures is 435 units, thus extrapolating the *Modified Principal Scenario* provides an additional 2,175 units over this period (11,700 units, as opposed to 9,525 units under the *Principal Scenario*).

However it is the early stages of the plan, which will directly influence housing allocations in the forthcoming LDPs, the *Modified Principal Scenario* results in a loss of housing allocations, with a significantly higher

projection for the period 2033 – 2040. In reality by the time that this period is being planned at a Local Development Plan level these allocations are likely to have been revised through subsequent plans.

Therefore whilst following a positive trajectory, in line with the economic ambition and strategic investment that has is being demonstrated within the region, in effect the SDPA's *Modified Principal Scenario* reduces the ability for the LDPs that are currently at an early stage to plan for this positive growth.

Rather than to defer over 1,000 homes from the 2016-32 period into the later plan period for which allocations do not require to be made, applying the *HNDA Scenario 3 High Migration* provides higher allowances, with a trajectory which recognises the ambition within the region to diversify and grow.

In their response, Homes for Scotland demonstrates that completions in the year following the HNDA, recorded in the [2018 Housing Land Audit](#), rose and follow an upward trajectory for the remainder of the LDP period to 2021, beyond which housing allocations are yet to come forward. Therefore utilising the HNDA Scenario 3 provides both the robust base and the higher figures that are both required by SPP and being delivered by the housebuilding industry in the north-east respectively.

PAPER APART

BNS ISSUE 4: Housing Land Requirement

4. Our Communities, Delivery of New Homes – Paragraphs 4.11-4.13 / Table 2: Housing Land Requirement

WHAT CHANGE WOULD YOU LIKE TO SEE MADE:

The 20% generosity margin applied to the Housing Supply Target applied to all three plan periods, with table 2 amended to reflect this and para 4.11 modified to read:

*4.11 The Housing Land Requirement, Table 2, sets out a generous level of housing land to try and ensure that the Housing Supply Target can be met. An increase to the Housing Supply Target of 20% 'generosity' is **provided**. ~~focused on the first Plan period (to 2032) to cover the next Local Development Plans.~~ This will provide a generous land supply without compromising the viability of allocated sites or undermining existing allocations. ~~In the period 2033 to 2040 a 10% 'generosity' level has been added.~~*

Paragraph 4.17 should be deleted.

~~*It is important that the scale of these allocations does not undermine the deliverability and viability of the effective housing land supply. As such, the 2020 to 2032 period makes provision for moderate allocations, with levels increasing in the second half of the Plan period as the effective supply is delivered and additional housing land supply is required.*~~

WHAT WOULD YOU LIKE TO SAY ABOUT THE ISSUE:

Housing Land Requirement

Barratt North Scotland (BNS) welcome and support the 20% generosity level added to the Housing Supply Target. We agree with Homes for Scotland (HfS) that this is in line with Scottish Planning Policy (SPP) and will provide for flexibility in the delivery of homes over this period.

We agree with HfS that this 20% generosity margin should be carried on for the later stages of the Proposed SDP, increasing from the proposed 10% generosity in 2033-2040 to 20% across all plan periods to ensure that a 'generous supply of land for housing is provided' (SPP, para. 116).

The SDP must be more ambitious in planning for growth of the City Region, particularly in directing the amount of land that Local Development Plans (LDPs) will have to allocate. The HLR is a critical piece of evidence in the calculation of the housing allowances.

Similarly, BNS dispute the statement in the Proposed SDP that new allocations could undermine the existing supply (para 4.17). As evidenced in issue 5 below, and our justification in respect of 78% of allocations in the Aberdeen-Laurencekirk Strategic Growth Area being made to one site, which has failed to deliver even 10% of its allocation; increased competition would benefit homebuyers ensures a range of locations and options for new homes; and increases provision of affordable housing. Conversely, if a site is not attractive to the market or delivery delayed in any way, it will fail to come forward. The proposed reference to 'moderate allocations, with levels increasing in the second half of the Plan period as the effective supply is delivered and additional housing land supply is required' should not be replicated elsewhere in the plan as it could unduly prejudice subsequent LDPs.

PAPER APART

BNS ISSUE 5: Housing Allowances – Distribution between Housing Market Areas

4. Our Communities, Delivery of New Homes – Paragraphs 4.14-4.21 / Tables 1 *Housing Supply Target*, 2 *Housing Land Requirement* and 3 *Housing Allowances*

WHAT CHANGE WOULD YOU LIKE TO SEE MADE:

Housing allocations divided between the two housing market areas 85% / 15% in favour of the Aberdeen Housing Market Area, with Tables 1, 2 and 3 amended accordingly and paragraph 4.16 amended to read:

*In order to support sustainable communities, the best use of infrastructure, and increased levels of housing delivery, these allocations are divided on an ~~80% / 20%~~ **85% / 15%** basis between the Aberdeen Housing Market Area and the Rural Housing Market Area respectively.*

WHAT WOULD YOU LIKE TO SAY ABOUT THE ISSUE:

Barratt North Scotland (BNS) agree with the response to the consultation put forward by Homes for Scotland on this issue, having participated in the formulation of their response. In their Proposed Plan the SDPA has increased the split of housing allowances between the Aberdeen Housing Market Area (AHMA) and the Rural Housing Market Area (RHMA) from 75% / 25% in favour of the AHMA to 80% / 20% in favour of the AHMA. BNS believe that the justification provided by the authority within the Housing Methodology Paper would support a further increase in this split to an 85% / 15% split.

Paragraph 6.6 of the Housing Methodology Paper states that 45% of the identified housing land supply in the RHMA is constrained. This points to an issue of land deliverability in this HMA in many cases not being the right land allocated in the right places. Of these constrained sites in the RHMA, 67% have a marketability issue. This highlights that the challenges that the RHMA has, when compared with the AHMA.

We support sustainable growth of settlements in the RHMA, but it needs to be realistic and deliverable. There is already an established supply of land in these areas; and its constraints are due to their location and marketability. On this basis if the appeal of developing in those areas picks up, those sites constrained by the market can return to the effective supply, adding more sites into these areas.

Paragraph 6.7 of the Methodology Paper states that 40% of completions in the RHMA between 2006-2016 were on unallocated sites (compared to 25% in the Aberdeenshire part of the AHMA), further highlighting the issue with the delivery of allocated sites. If almost half of completions are not coming from allocated sites in this HMA, as opposed to a quarter in the Aberdeenshire part of the AHMA, this indicates that the land is being allocated inefficiently.

We agree with HfS that this is justification that further concentration should be made in the more marketable and deliverable AHMA rather than the RHMA, which could be achieved whilst still maintaining the 50% / 50% split between both local authorities, allowing more Aberdeenshire allocations to be made in the AHMA as opposed to the RHMA. Directing an increased proportion of future housing allocations to the AHMA will help to ensure deliverability and sustainability and limit the number of non-effective allocations in more challenging market locations.

Aberdeenshire Council introduced a policy in its 2012 LDP (*Policy 3 Development in the countryside*) which provided a more permissive approach to development in the RHMA, allowing for organic growth around certain settlements and the redevelopment of brownfield sites for small-scale residential development – which

significantly relaxed the previous restrictive context for development in the RHMA. This policy is carried forward in the extant Aberdeenshire LDP 2017 (*R2 Housing and employment development elsewhere in the countryside*), with minor amendment to the parameters for organic growth. This policy continues to be a well-used tool for the promotion of small scale and bespoke development, fulfilling a diverse and bespoke requirement for development within the rural area, which has proven to be a much more successful approach to stimulation of development in the RHMA than identification land for larger development in the absence of a strong market.

In order to stimulate investment, a larger proportion of housing allocations should be focused in the AHMA, in areas where there is a market requirement for development of a scale that will provide developers the return required to front-fund new or improved infrastructure and generate meaningful contributions towards community services.

Similarly, large scale housing allocations in the AHMA have attracted investors and new RSL partners to the area; and permitted innovative and new forms of investment in infrastructure and affordable housing provision to be provided, in areas where market, demand and scale are all present.

On this basis we believe that the case for the SDP to increase the share of its housing allowances for the AHMA, resulting in an 85% / 15% split is robust and this should be reflected in the plan.