

Archibald B (Brian)

From: Archibald B (Brian)
Sent: 26 May 2016 12:17
To: Aitken, Anthony (Anthony.Aitken@colliers.com)
Subject: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2
Attachments: FIR 8 Issue 2 May16.pdf

Tracking:	Recipient	Delivery
	Aitken, Anthony (Anthony.Aitken@colliers.com)	
	[REDACTED]	
	[REDACTED]	[REDACTED]

Hello Anthony

I acknowledge receipt of your response to FIR 08, this will be passed to the reporter.

Thanks
Brian Archibald

From: Aitken, Anthony [mailto:Anthony.Aitken@colliers.com]
Sent: 25 May 2016 11:51
To: Archibald B (Brian)
Subject: RE: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear Brian,

Please find enclosed the response of Mactaggart & Mickel (123) relative the Aberdeen City Council response to the DPEA further request for information on Issue 2, as detailed above.

If you can kindly acknowledge safe receipt that will be appreciated.

Kind regards

Tony

[Anthony Aitken](#) BSc MRTPI
Head of Planning
Direct +44 131 240 7512 | Mobile +44 7711 713065 | [View My Profile](#)
Main +44 131 240 7500 | Fax +44 131 240 7599
1 Exchange Crescent
Conference Square
| Edinburgh EH3 8AN | United Kingdom



Confidentiality Notice: This communication and the information it contains: (a) is intended for the person(s) or Organisation(s) named above and for no other persons or organisations and, (b) may be confidential, legally privileged and protected by law. Unauthorised use, copying or disclosure of any of it may be unlawful. If you receive this communication in error, please notify us immediately, destroy any copies and delete it from your computer system.

From: Brian.Archibald@gov.scot [<mailto:Brian.Archibald@gov.scot>]

Sent: 17 May 2016 11:55

To: Aitken, Anthony

Cc: Crowe, Meabhann

Subject: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Anthony

Original e-mail request

Thanks

Brian

From: Archibald B (Brian)

Sent: 11 May 2016 15:56

To: 'gary.purves@knightfrank.com'; 'ian.livingstone@ryden.co.uk'; 'john.findlay@ryden.co.uk'; 'sandy.hutchison@taqaglobal.com'; 'Meabhann.Crowe@colliers.com'; 'christopher.ross@barratthomes.co.uk'; 'ewan@emacplanning.co.uk'; 'planningscotland@gladman.co.uk'; 'Christine.Dalziel@hfm.co.uk'; 'info@aberdeencivicsociety.org.uk'; 'tim.reid@urbanwilderness.co.uk'; 'Theresa.Hunt@burnesspaull.com'; 'n.miller@homesforscotland.com'; 'planning@hfm.co.uk'; 'Emelda@emacplanning.co.uk'; 'dpope@nlplanning.com'; 'gary.purves@knightfrank.com'; 'bob.reid@hfm.co.uk'; 'info@bancon.co.uk'; 'robert.patrick@persimmonhomes.com'; 'ian.mcgouldrick@persimmonhomes.com'

Cc: Andrew Brownrigg (ABROWNRIGG@aberdeencity.gov.uk); Donna Laing (DLaing@aberdeencity.gov.uk)

Subject: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Dear All:

Please find attached Aberdeen Council's response to further information request 8 relating to the housing land supply. Some of this response (questions 2, 4, 5 and 6) comprises factual explanation based on existing information, and the reporter does not seek any further comment from parties on these questions. However the reporter is willing to accept any response parties may wish to make to what the council has said in relation to questions 1, 3 and 7. I would be grateful if responses could be sent to me to pass to the reporter by 5pm on 25 May 2016.

A copy of this request will be published on the DPEA website together with any responses you intend to submit.

<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=117092>

Please do not hesitate to contact me if there is anything you would like clarified.

Brian Archibald

From: Archibald B (Brian)

Sent: 10 May 2016 16:06

To: Andrew Brownrigg (ABROWNRIGG@aberdeencity.gov.uk)

Cc: Donna Laing (DLaing@aberdeencity.gov.uk)

Subject: FW: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Andrew

I acknowledge receipt of your response for FIR 08

Thanks
Brian

From: Andrew Brownrigg [<mailto:ABROWNRIGG@aberdeencity.gov.uk>]
Sent: 10 May 2016 15:12
To: Archibald B (Brian)
Cc: Donna Laing
Subject: ABERDEEN LOCAL DEVELOPMENT PLAN - FURTHER INFORMATION REQUEST 08 - ISSUE 02 - HOUSING LAND SUPPLY AND POLICY LR1 & LR2

Hello Brian

Please find our response to Further Information Request 8 on Issue 2. I have arranged the responses underneath the individual elements of the request which are highlighted in **bold**.

Information requested

- 1. In considering the balance between large sites and small sites in the housing land supply, it might be useful to consider the situation across the Aberdeen housing market area as well as in Aberdeen city in isolation. The council is requested to supply a table showing the numbers of houses proposed on allocated sites of over 500 units, of between 100 and 500 units, and of under 100 units in the (a) Aberdeen City and (b) Aberdeenshire portions of the Aberdeen housing market area, and (c) across the housing market area as a whole.**

Response

We have attached the tables as requested. However, it should be noted that many of the brownfield sites in Aberdeen do not have an actual number of units allocated to them – only if there has been consents have we stated numbers for individual sites. We have therefore shown a separate table of brownfield sites showing the OP reference, name and size. It is likely that most of these sites will be for under 100 units. Likely exceptions (because of their large size) are;

- OP13 AECC Bridge of Don
- OP105 Kincorth Academy
- OP77 Cornhill Hospital (consent now granted for 323 units - after publication of the Proposed Plan)
- OP93 Former Summerhill Academy

We have also produced a separate table of those sites carried over from the 2008 Local Plan as these do not count towards the SDP housing requirement (see also Question 6).

When considering the issue of site size, it also needs to be recognised that larger sites are often subdivided into smaller sites for individual builders. Indeed, the two largest sites (accounting for over 11,000 homes) are owned and managed by development companies rather than house builders (Elsick Development Company in Aberdeenshire and the Grandhome Trust in Aberdeen). By their very nature they will be relying on different builders to take on different phases of development. Although using a more traditional model, the third largest site (Countesswells with 3,000 homes) has also recently announced the sale of the first areas of land to other builders.

This further information request relates to houses proposed on allocated sites. It should also be noted that a broader picture of all sites will be provided in the full Established Land Supply as set out in Appendix 2 of the 2015 Housing Land Audit.

- 2. It is assumed that the housing requirement for the Aberdeen housing market area shown in figure 13 of the housing land audit 2015 is derived in some way from figure 10 of the strategic development plan. The council is asked to explain how the housing requirement for the Aberdeen housing market area in figure 13 of the housing land audit 2015 is calculated.**

Response

Yes – Figure 10 of the 2014 SDP is the source of the housing requirement. The requirement changes over the SDP periods, so the 2015 Housing Land Audit works out the requirement for the period 2015-19 by taking the average annual requirements for the two periods (2011-16 and 2017-26) and adding them together. The average annual requirement for 2011-16 is 1660.83 units and for 2017-26, the average annual requirement is 1501.7 units. Thus $(1660.83 \times 2) + (1501.7 \times 3) = 7827$ for the period 2015 to 2019.

- 3. Is it possible to derive a housing requirement for Aberdeen City alone, as envisaged by paragraph 118 of Scottish Planning Policy (accepting that Scottish Planning Policy envisages this as a role for the strategic development plan)?**

Response

No, it is not possible to derive a housing requirement (housing supply target under SPP 2014 terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA). There is a housing land requirement effectively contained in Schedule 1 of the SDP, but not a housing requirement because the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

The Aberdeen City and Shire SDP was approved by Scottish Ministers in March 2014, prior to the publication of SPP in June 2014. There was no requirement in the earlier version of SPP to provide the housing requirement at the council area level. Guidance at that time (and to a large extent still does) focused on planning for housing at the Housing Market Area level. We note SPP now requires the housing supply target to be set at the council area level in addition to housing market area and this will be reflected in the next Strategic Development Plan

SPP is unhelpful in being silent on the matter of which housing supply target should be used to determine the adequacy of the housing land supply but, in order to be consistent with the SDP, it is clear that for the plan currently being examined it is at the HMA level.

- 4. Are the sites listed in appendix 1 table 2 of the proposed plan all either already built, effective or expected to become effective in the plan period?**

Response

All of the sites in Appendix 1 Table 2 have had consents since 2011. Many of them are already built out or are under construction or considered effective. The following sites are however, regarded as non-effective in the 2015 Housing Land Audit; Balgownie Centre (OP5) and Pittodrie Stadium (OP87). Both are regarded as having ownership constraints. The 2015 HLA indicates that both sites have planning consents and both are included as opportunity sites in the Proposed Plan. OP87 is dependent on a new stadium being built with a new stadium having planning consent (at OP59 Loirston) on page 87 of the Proposed Plan.

5. Paragraph 2.12 of the proposed plan identifies sources for between 5,398 and 7,287 potential units on brownfield sites in the plan period. Does this take account of the potential product of the brownfield opportunity sites identified in appendix 2 and on the proposals map?

Response

Yes.

If not, how many units may these sites be expected to deliver by 2026? Have these sites been accounted for elsewhere in the council's housing land calculations that are before the examination?

Response

No – we have been very careful to avoid double counting. Firstly, any sites that were considered effective in the 2011 Housing Land Audit have not been counted towards any of the SDP requirements (brownfield or greenfield) for this Plan – see also Question 6 below in respect of the greenfield sites. Neither have we double counted the figures from sites in Appendix 1 with any of the brownfield opportunity sites identified in Appendix 2. Where a consent has been granted (those sites identified in Appendix 1 Table 2) we have used that figure. Otherwise we use the range of calculations derived from the Brownfield Potential Study, but only apply them once to each site, whether they be in Appendix 1 Table 1 or Appendix 2 of the Proposed Plan, or both.

We have attached a copy of the 2011 Housing Land Audit for information. Appendix 2 contains a detailed table of the established, constrained and effective land supply 2011 for Aberdeen City. I can send a hard copy of this section by post.

6. Paragraph 8 of the council's response as set out in the schedule 4 form indicates that sites remaining from the Aberdeen Local Plan 2008 (such as OP41 Friarsfield and OP58 Stationfields) have not been counted towards the SDP allowances. Is it the case that the product of such sites will have been accounted for under the effective or constrained land supply columns of schedule 1 of the strategic development plan?

Response

Yes. The following greenfield sites have been carried over from the 2008 Local Plan. The figures in brackets show their status in the 2011 Housing Land Audit and therefore the number of units from each site that were included in the effective and constrained land supply columns in Schedule 1 of the SDP;

- OP28 Greenferns (120 houses constrained in the 2011 HLA)
- OP56 Cove (687 houses effective in 2011 HLA)
- OP58 Stationfields (150 houses effective in 2011 HLA)
- OP41 Friarsfield (280 houses effective in 2011 HLA)

None of the figures relating to these sites have been used to meet the housing allowances of the 2014 SDP. This is despite the fact that additional consents since 2011 at OP56 has increased the total capacity of the site by 122 units to 809 (see entries for Wellington Road, Cove Bay and Cove West in the 2015 HLA).

7. How should the second column of tables 3 to 8 in the proposed plan be interpreted? Should this actually refer to 'Existing to 2016' and so be consistent with table 2?

Response

Yes it should be 'Existing to 2016' – 'Existing to 2026' is an error which has been repeated from Tables 3 to 8. We would be grateful if the Reporters could rectify this.

Is this column a record of the assumptions made in the adopted local development plan (and hence in column 5 of schedule 1 of the strategic development plan) as to the land that would be made available by 2016?

Response

Yes. They are the same greenfield sites and numbers as those identified in Tables 5 to 10 of the 2012 Local Development Plan under the column 2007-2016. These represent the 'Existing LDP allowances to 2016' column identified in Schedule 1 of the SDP.

Can the figures in columns 2, 3 and 4 of these tables be added together to give the total capacity for each site?

Response

Yes. We would be happy to have a further column added to the tables if the Reporters considered it useful.

If any further information is required then please get in touch.

Regards, Andy

Andrew Brownrigg
Team Leader (Development Plan)
Communities, Housing and Infrastructure
Aberdeen City Council
Business Hub 4 Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Email abrownrigg@aberdeencity.gov.uk
Direct Dial 01224 523317

Switchboard 03000 200 292
Website www.aberdeencity.gov.uk/localdevelopmentplan

 [@AberdeenLDP](https://twitter.com/AberdeenLDP)

IMPORTANT NOTICE: This e-mail (including any attachment to it) is confidential, protected by copyright and may be privileged. The information contained in it should be used for its intended purposes only. If you receive this email in error, notify the sender by reply email, delete the received email and do not make use of, disclose or copy it. Whilst we take reasonable precautions to ensure that our emails are free from viruses, we cannot be responsible for any viruses transmitted with this email and recommend that you subject any incoming email to your own virus checking procedures. Unless related to Council business, the opinions expressed in this email are those of the sender and they do not necessarily constitute those of Aberdeen City Council. Unless we expressly say otherwise in this email or its attachments, neither this email nor its attachments create, form part of or vary any contractual or unilateral obligation. Aberdeen City Council's incoming and outgoing email is subject to regular monitoring.

This email was scanned by the Government Secure Intranet anti-virus service supplied by Vodafone in partnership with Symantec. (CCTM Certificate Number 2009/09/0052.) In case of problems, please call your organisations IT Helpdesk.

Communications via the GSi may be automatically logged, monitored and/or recorded for legal purposes.

This email has been received from an external party and

has been swept for the presence of computer viruses.

This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return.

Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo le gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh, leig fios chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been received from an external party and
has been swept for the presence of computer viruses.

DPEA Q1. In considering the balance between large sites and small sites in the housing land supply, it might be useful to consider the situation across the Aberdeen housing market area as well as in Aberdeen city in isolation. The council is requested to supply a table showing the numbers of houses proposed on allocated sites of over 500 units, of between 100 and 500 units, and of under 100 units in the (a) Aberdeen City and (b) Aberdeenshire portions of the Aberdeen housing market area, and (c) across the housing market area as a whole.

Aberdeen City Council Response

We have attached the tables as requested. However, it should be noted that many of the brownfield sites in Aberdeen do not have an actual number of units allocated to them – only if there has been consents have we stated numbers for individual sites. We have therefore shown a separate table of brownfield sites showing the OP reference, name and size. It is likely that most of these sites will be for under 100 units. Likely exceptions (because of their large size) are;

- OP13 AECC Bridge of Don
- OP105 Kincorth Academy
- OP77 Cornhill Hospital (consent now granted for 323 units - after publication of the Proposed Plan)
- OP93 Former Summerhill Academy

We have also produced a separate table of those sites carried over from the 2008 Local Plan as these do not count towards the SDP housing requirement (see also Question 6).

When considering the issue of site size, it also needs to be recognised that larger sites are often subdivided into smaller sites for individual builders. Indeed, the two largest sites (accounting for over 11,000 homes) are owned and managed by development companies rather than house builders (Elsick Development Company in Aberdeenshire and the Grandhome Trust in Aberdeen). By their very nature they will be relying on different builders to take on different phases of development. Although using a more traditional model, the third largest site (Countesswells with 3,000 homes) has also recently announced the sale of the first areas of land to other builders.

This further information request relates to houses proposed on allocated sites. It should also be noted that a broader picture of all sites will be provided in the full Established Land Supply as set out in Appendix 2 of the 2015 Housing Land Audit.

Mactaggart & Mickel Comment

Mactaggart & Mickel have reviewed the response provided by ACC and the tables that were appended to their response. They have the following observations with regard to the matters raised;

Scottish Government Planning Policy (SPP) outlines in paragraph 110 that;

“The Planning System requires to identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times.”

Mactaggart & Mickel are of the view that there is a lack of medium size effective sites being planned for in the 100-500 unit range, in the ACC LDP and the tables reaffirm this matter.

As advocated in paragraph 117 of the SPP;

“The housing land requirement can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development. Any assessment of the expected contribution to the housing land requirement from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends. In urban areas this should be informed by an urban capacity study.”

There is an over reliance in Aberdeen City on large strategic sites of over 500 units providing the units required to meet the housing land supply, for close to 20K units. Sites of this scale and nature usually require to provide significant tranches of infrastructure, transport, roads, education to name a few, to allow them to progress and deliver their potential residential output in full over an elongated time period, dependent upon their individual site size.

Mactaggart & Mickel believe their landholding at Howes Road/Newton Croft, Bucksburn (100-2) could provide a new effective allocation as a medium size site that is effective and could provide residential units within the ACC LDP period.

In the response and tables provided by ACC there is in the view of Mactaggart & Mickel an over-reliance on brownfield windfall sites which may not yield the residential output anticipated. ACC have not provided unit numbers and merely the areas that these sites cover as they also recognise that it can be difficult to accurately predict the residential output and delivery from these opportunity sites. Mactaggart & Mickel believe that this also points towards a degree of uncertainty that could be addressed with the allocation of more certain medium size effective housing sites.

Mactaggart & Mickel believe that the indication in the ACC response that larger sites get sub-divided into smaller sites is somewhat simplistic and does not fully address the question being posed. The strategic sites have to meet the infrastructure challenges that strategic residential sites require to address in full with upfront and early associated costs. This often results in significant lead in times and often delays initial delivery and output. Whilst it is recognised that builders will purchase parts of these sites to develop out, these sites cannot compensate for the lack of medium size effective housing sites in the ACC LDP.

DPEA Q3. Is it possible to derive a housing requirement for Aberdeen City alone, as envisaged by paragraph 118 of Scottish Planning Policy (accepting that Scottish Planning Policy envisages this as a role for the strategic development plan)?

Aberdeen City Council Response

No, it is not possible to derive a housing requirement (housing supply target under SPP 2014 terminology) for Aberdeen City in isolation from the wider Aberdeen Housing Market Area (HMA). There is a housing land requirement effectively contained in Schedule 1 of the SDP, but not a housing requirement because the provision of housing across the Aberdeen Housing Market Area is a shared responsibility.

The Aberdeen City and Shire SDP was approved by Scottish Ministers in March 2014, prior to the publication of SPP in June 2014. There was no requirement in the earlier version of SPP to provide the housing requirement at the council area level. Guidance at that time (and to a large extent still does) focused on planning for housing at the Housing Market Area level. We note SPP now requires the housing supply target to be set at the council area level in addition to housing market area and this will be reflected in the next Strategic Development Plan

SPP is unhelpful in being silent on the matter of which housing supply target should be used to determine the adequacy of the housing land supply but, in order to be consistent with the SDP, it is clear that for the plan currently being examined it is at the HMA level.

Mactaggart & Mickel Comment

Mactaggart & Mickel believe that the DPEA question is fairly framed and the ACC response in indicating that this is a matter for the SDP does not seek to address the point of the question posed. ACC should be perfectly capable of seeking to derive a housing requirement for the City in its own right, irrespective of the SDP provisions or HMA. The LDP should be focussing on solely the requirement for the ACC area and the SPP requirement in paragraph 118 should be reflected in the new LDP. Mactaggart & Mickel believe the DPEA should request that this is undertaken by ACC for this LDP. To seek to indicate that this is for the next SDP is not considered acceptable and does not indicate a willingness to seek to address the urgent housing requirements faced in the country as a whole. The ACC response seeks to rely on planning process as opposed to being proactive to embrace the clear requirements of the SPP, this is regrettably typical of local authorities and fails to demonstrate the 'culture change' required to ensure that homes are provided in sufficient number at the time people require to be housed.

Mactaggart & Mickel are of the view that the SPP in paragraph 119 is quite clear on the terms and requirements to meet the housing land requirement in full;

“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.”

DPEA Q7. How should the second column of tables 3 to 8 in the proposed plan be interpreted? Should this actually refer to ‘Existing to 2016’ and so be consistent with table 2? Is this column a record of the assumptions made in the adopted local development plan (and hence in column 5 of schedule 1 of the strategic development plan) as to the land that would be made available by 2016? Can the figures in columns 2, 3 and 4 of these tables be added together to give the total capacity for each site?

Aberdeen City Council Response

Yes it should be ‘Existing to 2016’ – ‘Existing to 2026’ is an error which has been repeated from Tables 3 to 8. We would be grateful if the Reporters could rectify this.

Yes. They are the same greenfield sites and numbers as those identified in Tables 5 to 10 of the 2012 Local Development Plan under the column 2007-2016. These represent the ‘Existing LDP allowances to 2016’ column identified in Schedule 1 of the SDP.

Yes. We would be happy to have a further column added to the tables if the Reporters considered it useful.

Mactaggart & Mickel Comment

There are three parts to this question, as detailed in the response from ACC above. In part one Mactaggart & Mickel note the error and acknowledge that ACC have requested this will be rectified. Mactaggart & Mickel concur with the response provided by ACC in part two and agree that columns 2-4 should be merged, as opposed to an additional column suggested by ACC for part three of this question.