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Local Development Plan Team

Aberdeen City Council
Business Hub 4
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Marischal College
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Dear Sir/Madam,

**ABERDEEN LOCAL DEVELOPMENT PLAN 2016 – RESPONSE TO
PROPOSED PLAN
POLICY H4 HOUSING MIX
POLICY H5 AFFORDABLE HOUSING
POLICY LR1 LAND RELEASE
On behalf of CALA Homes (North) Limited.**

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SPACE PLANNERS

I write with reference to the above consultation on the Proposed Aberdeen Local Development Plan (PLDP) on behalf of our client CALA Homes (North) Limited. This letter responds to the following policies:

- Policy H4 Housing Mix
- Policy H5 Affordable Housing
- Policy LR1 Land Release

PARTNERS

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We wish to make the following comments in relation to the proposed policies.

POLICY H4 HOUSING MIX

This policy requires that any development of above 50 units will include a mix of housing types and sizes. We appreciate that a mix of housing should be delivered across the City. However, we do not feel that the policy should be too prescriptive in requiring that every *site* must be deliver a wide range of house types.

It may be that a site is brought forward to be aimed at a particular market, and it is not for the LDP to dictate at the plan stage what that mix may be. It is well known that the mix of house types to be delivered is subject to change throughout the lifetime of the LDP. This will be as a result of market demand rather than as is dictated in through the plan.

It may not be appropriate to deliver one and two bed homes on particular sites and the policy must recognise this.

POLICY H5 AFFORDABLE HOUSING

The policy proposed requires that *“all sites over four units requires no less than 25% of the total number of units as affordable housing”*. This may cause confusion and disagreement in instances where 25% does not equate to a round number. For example in a site delivered for 50 units, is the affordable requirement 12 units or 13?

SPP states that *‘no more than 25% of total numbers’* require to be affordable units. We therefore suggest that the policy wording should read that a **target** of 25% of the total numbers of units on the site to ensure that a reasonable level of affordable housing is delivered on site and appropriate to the development.

We would also question the requirement for all sites over four units require to contribute, and suggest that this is onerous in comparison to national standards. We suggest a more reasonable figure be identified for the minimum number of units per site which requires to provide a contribution.

We would seek further clarity from the Council on how this minimum figure was reached and why this is so much more onerous than as is suggested by national policy. Page 27 of the SPP identifies that a key document which must be considered in the delivery of new homes is Planning Advice Note 2/2012 Affordable Housing and Housing Land Audits. Paragraph 16 of the PAN states that *“local authorities and developers can normally expect on-site provision to be appropriate for developments of 20 or more units”*. However the proposed Policy H5 states this must be four or more units.

We would question how this figure was reached and suggest that perhaps ten units is a more appropriate minimum housing number to require this level of on site contribution.

In any case, further clarification on why the City Council seek a contribution on such small housing sites is requested.

POLICY LR1

Policy LR1 relates to the requirement of allocating a sufficient number of sites to allow for an effective housing land supply in the Plan period. We would like to note that despite significant levels of housing land being allocated, the delivery of the sites across the City is cause for concern. As evidenced in the build-out rate over the past few years (or lack thereof), the sites allocated for development in the last Plan period are not delivering at the rates predicted at the time and certainly not delivering homes to meet demand.

Quite clearly the scale and pace of delivery for the major housing sites have not met expectations (see the 2014 and draft 2015 HLA). The successive Housing land Audits have exposed a lack of delivery and long lead-in times to get sites on the ground.

We support the need for a 5-year Housing Land Supply. However, we maintain a position on the need for further housing land to be identified. The housing land allocations in the PLDP are predicated on the housing requirements set out in the 2012 Strategic Development Plan (SDP).



A 5 year housing land supply is required at all times during the lifetime of the LDP. However, in analysing the allocations versus delivery it's clear that the current allocations are not providing the scale of housing required by the SDP.

CONCLUSION

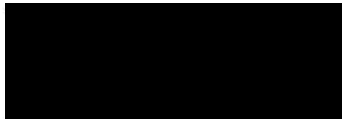
We would request that there is an understanding in Policy H4 that the housing mix to be delivered on a particular site is subject to change and may not be appropriate for a wide range of tenures.

We would also request that Policy H5 is altered to read that *"a target of 25% of the total number of units"* on site should be affordable housing to remove any confusion surrounding definitive affordable unit numbers.

Furthermore, we request further information from Aberdeen City Council as to how this minimum level of four units was reached. This does not accord with national guidance and it is not clear why the Council have identified this.

Finally, although it is noted that there is a significant number of units allocated for development, these are attributed to just a few large sites. In order to meet the housing delivery targets, we maintain, as has been the case since the production of the extant Local Development Plan, that further housing sites are required.

Yours faithfully,



Christine Dalziel
Associate Planning Consultant
Halliday Fraser Munro

