**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**

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| **Organisation****(*optional*)** | **Homes for Scotland** |
| **On behalf of****(if relevant)** |  |
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What is your preferred method of communication: email

**HOMES FOR SCOTLAND REPRESENTATIONS
December 2018**

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| **What document are you commenting on?** | Proposed Strategic Development Plan X |
| **HFS Issue 1** | SPATIAL STRATEGY | **Paragraph(s)** |  |

**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)*

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| 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. Homes for Scotland (HFS) generally welcomes the spatial strategy, however, believes 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. HFS considers that the Aberdeen City Strategic Growth Area (SGA) should be extended to include Westhill, or alternatively a new growth corridor to the west of Aberdeen could be created. Westhill is in a unique position, close to Aberdeen itself, but not currently within an SGA. With employment opportunities and good connections to the city (by public transport, park & ride and road), it is a desirable location for people to live with a demand for homes. The new Aberdeen Western Peripheral Route (AWPR) will support these transport connections and will only make Westhill more desirable as an area to live. HFS believes Westhill to be a sustainable option for new homes which should be included within an SGA to allow allocations and new homes to be delivered here.HFS 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. |

**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)*

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| HFS requests that the boundary of the Aberdeen City SGA is extended to include Westhill and all relevant supporting text within the Plan is updated to align with this approach, or a new SGA is created to the west of Aberdeen.HFS requests that paragraph 3.14 of the Proposed Plan is amended to remove reference to resisting new development adjacent to the AWPR. |

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| **What document are you commenting on?** | Proposed Strategic Development Plan X |
| **HFS Issue 2** | DELIVERY OF NEW HOMES | **Paragraph(s)** | Page 27 Targets |

**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)*

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| Within the Targets for Placemaking on page 27 of the Proposed Plan, bullet 3 relates to density of development. Homes for Scotland (HFS) would note that 50 dwellings per hectare within the Aberdeen City Strategic Growth Area (SGA) will be very difficult for a home builder to achieve, unless flatted development is proposed. This is in direct conflict with the desire to create sustainable mixed communities. The 30 dwellings per hectare set out in the extant SDP should be retained within the Aberdeen City SGA to ensure mixed communities with a variety of average densities can be achieved. HFS supports the target set on page 27 of the Proposed Plan (bullet 4) for levels of affordable housing to be “generally no more than 25%” which is in line with Scottish Planning Policy (SPP) paragraph 129. Given that forthcoming Local Development Plans (LDPs) will require to be consistent with the SDP, this inclusion will ensure that the new LDPs will also be in line with SPP.The Housing Methodology Paper supporting the Proposed Plan states that “it is not expected that Local Development Plans would increase the 25% contribution for affordable housing” (paragraph 7.13). HFS considers that this wording could be strengthened both within the Plan and supporting documents to provide a clear steer to LDPs that the proportion of affordable housing to be delivered on a market site must be in line with the requirements of SPP.It is critical that the significant contribution of the private sector is recognised in delivering affordable homes in the city region. Indeed, at a recent Aberdeenshire Affordable Housing Forum, the authority confirmed that 75% of affordable housing delivered in Aberdeenshire is through the affordable housing policy within the LDP, meaning that the affordable housing contribution from market sites is allowing for the delivery of three quarters of the authority’s affordable homes. It is therefore vital that market delivery is allowed to continue and increase to ensure that more affordable homes can be delivered in the city region. Given that funding for affordable housing delivery is now uncertain after 2021, it is important that the private sector is not burdened with increased responsibility for delivering affordable housing, given the already significant contribution it makes at the moment to affordable housing delivery in the city region.  |

**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)*

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| HFS requests that bullet 3 within Targets on page 27 of the plan is amended to be more flexible in its wording on density within the Aberdeen City SGA to ensure that it does not deter potential new development from coming forward in this key growth area by setting a density level which will not encourage sustainable mixed communities in the SGA.HFS requests that stronger wording is included within the Plan to direct LDPs on affordable housing contributions to ensure they are in line with SPP, and do not place additional unwarranted burdens on the private sector which already significantly contributes towards the delivery of affordable housing in the City Region. |

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| **What document are you commenting on?** | Proposed Strategic Development Plan X |
| **HFS Issue 3** | DELIVERY OF NEW HOMES | **Paragraph(s)** | Paragraphs 4.9-4.10 and Table1: Housing Supply Target |

**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)*

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| Homes for Scotland (HFS) has significant concerns regarding the SDPA’s methodology and calculation of the housing supply target (HST), housing land requirement (HLR) and housing allowances. These issues are set out in separate issues for the purposes of the submission of representations, and all relate to one another so should be considered as a package.Scottish Planning Policy (SPP) states that the HST is a “*policy view of the number of homes*” to be delivered (paragraph 115), and that “*wider economic, social and environmental factors*” should be taken into account. HFS considers that the HST must take an ambitious approach, recognising the significant economic and social value that the delivery of new homes will make to the City Region. To further promote economic recovery and growth in the City Region and meet the significant social challenge of delivering more affordable homes, an ambitious HST should be set by the SDP. To achieve the growth that the City Region aspires to, the SDP must be in line with this ambition and set bold targets to drive delivery of new homes.HFS acknowledges that all HNDA scenarios have declining trends towards the later years of the assessment. We understand that the SDPA has sought to reverse this to provide a more positive rising growth trend to the later years of the plan. HFS would note that the downward trajectories of all of the HNDA scenarios do not align with the home building industry’s aspirations, nor the City Region’s aspirations for growth. However, instead of providing a more aspirational approach to the later stages of the plan alone, the SDP has sought to modify the Principal Scenario, adjusting it to be lower in aspirations in the first few years of the Plan and growing towards later years of the Plan. Rather than achieving the positive modification that the SDPA set out to accomplish, the result is, in fact, negative. SPP requires that the HST “*should properly reflect the HNDA estimate of housing demand in the market sector*” (paragraph 115), however HFS does not consider the HST set by the Proposed Plan properly reflects the HNDA as it inverts the curve of the Principal Scenario. Comparing the Modified Principal Scenario with the original Principal Scenario (see Appendix 1), the HST total from 2016-2032 in the Principal Scenario is 37,484, and in the Modified Principal Scenario is a lower total of 36,400. It is therefore clear that the result of the modification is to remove over 1,000 homes from the 2016-2032 plan period. That is 1,000 homes that are needed but are not planned for due to the change in the HNDA scenario. Those homes are pushed out to later years of the plan where there is far less certainty over deliverability. The period to 2032 is the key period for which allowances are made, with the period beyond this only requiring an “*indication of the possible scale and location of housing land*…” (SPP, paragraph 118). LDPs are not required to make allocations in this later period post 2032. HFS therefore does not support the HST set by the Proposed Plan based on the Modified Principal Scenario due to a lack of ambition in the target, and a target which does not properly reflect the HNDA estimate.SPP further requires the HST to be “*supported by compelling evidence*” (paragraph 115). HFS does not consider that compelling evidence has been provided by the SDPA in demonstrating its divergence from the HNDA scenario. The Methodology Paper does not explain the significant implications of the modification of the Principal Scenario for the SDP plan period 2020 – 2032, which is the key period over which the forthcoming LDPs will have to allocate land.For example, paragraph 3.5 of the Methodology Paper lists factors which have been taken into account in setting the HST. These appear merely as a list and have no explanation provided to demonstrate what assumptions have been used, what conclusions have been drawn, and importantly how these factors have influenced the HST.Further, Paragraph 3.110 of the Methodology Paper states that HSTs are “*realistic yet ambitious level of delivery given the city region’s historic levels of home completions and the current economic recovery*”. HFS believes that looking back to past completions trends is not an appropriate way to guide the future ambition of the city region’s growth. With the significant impact of the drop in oil price in recent years, looking back to recent years of home delivery gives a falsely negative view of the potential for the region to deliver in the future. Projected completions from the 2016 Housing Land Audit show increased levels of completions programmed than the actual completions from the past few years. HFS believes that the SDP should be looking forward and setting ambitious targets that drive the increased delivery of new homes, rather than looking back to previous lower levels of delivery.Paragraph 3.7 of the Housing Methodology Paper shows the annual average homes per annum from each of the three HNDA scenarios. Whilst we are aware that the new HNDA and Plan both ‘reset’ the aspirations, need and demand for growth in the city region, it is still relevant to consider that the aspiration of the last SDP was to move towards the delivery of 3,000 homes per annum by 2020. Looking at projected completions from the most recent 2018 Housing Land Audit, the City Region will meet this aspiration by 2019, therefore demonstrating the ability and desire to achieve far higher levels of completions in the future.HFS therefore supports the most ambitious HNDA scenario, the High Migration Scenario to strive towards significantly increasing the delivery of homes in the city region over time in line with need and demand, and positively supporting the recovery and economic growth of the region and delivery of affordable homes. For the avoidance of doubt, HFS would note that the High Migration Scenario is Scenario 3 from the HNDA, with the Principal Scenario being Scenario 1.The Methodology Paper states that “*completions have only exceeded 2,000 homes per annum once in the period 2009-2016*” (paragraph 3.17, bullet 2), looking backwards at historic trends of completions. However, this is misleading as looking more recently, we know that completions last year in 2017 were over 2,000 homes and indeed the average number of completions over the past 5 years has been 2,003 homes per annum. Looking forward, projected completions are far higher than 2,000 homes per annum.The Methodology Paper (paragraph 3.17, bullet 3) states that “*the development industry may encounter difficulties in delivering such numbers given its current construction capacity*”, however to the contrary, it should be noted that during the most difficult period for home building in recent times, the industry managed to deliver an average of 2,000 homes per annum, therefore the future potential for delivery by the home building industry looks positive. In addition to the difficult economic climate, the industry managed to deliver this consistent level of homebuilding through a period where the last Local Development Plans in the region largely provided significant strategic allocations. These take time to work through the planning and other consenting processes to delivery, and we are now seeing the delivery of some of these sites coming forward now and in the next few years, at varying rates. While the SDPA states that “*an annual target of 2,768 new homes […] is not considered achievable or realistic*” (Background Paper, paragraph 3.17, bullet 2), looking at the programmed completions in the joint Aberdeen City and Shire Housing Land Audit prepared by the Councils themselves, the programmed completions in the recent 2018 Audit and the 2016 Audit used as an evidence base for this plan show several years above the level of 2,768 homes, and other years far closer to this annual target than any other HNDA scenario. Appendices 1 and 2 provide updated versions of Proposed Plan Table 1. These include the HST for the Principal and High Migration Scenarios, as well as an updated Modified Principal Scenario table to correct an error in calculation from the Proposed Plan table for use as a comparator. Despite the Housing Methodology Paper confirming that “*the Proposed Plan amends this percentage adjustment to 80% / 20% in favour of the Aberdeen Housing Market Area*”, on reviewing the table, the split between AHMA and RHMA for the first period from 2016-2019 is actually a 75% / 25% split. This is not explained anywhere in the Methodology Paper or the Plan. Appendix 1 updates the HST for the three scenarios to be 80% / 20% and Appendix 2 updates the HST for the three scenarios to an 85% / 15% split for comparison.In conclusion, HFS does not believe that the approach of the SDPA in modifying the Principal Scenario is in accordance with SPP as it is not closely aligned with the HNDA, nor does the Methodology Paper provide compelling evidence to support the divergence from the HNDA. The result of pushing need and demand (amounting to over 1,000 homes) which is identified in the HNDA scenario out of the key plan period to 2032 will result in LDPs not being required to allocate land to meet this need. Furthermore, the approach lacks ambition and is not adequately planning for growth in the City Region.  |

**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)*

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| HFS supports the High Migration Scenario. We request that this alternative HNDA scenario is used as the basis for the HST. We also request that Table 1 of the Proposed Plan is updated in line with a more ambitious evidence base, and Paragraph 4.10 of the Proposed Plan also updated accordingly.HFS supports an 85% / 15% split between the Aberdeen Housing Market Area and Rural Housing Market area. Justification for this is explained fully under HFS Issue 5 – Housing Allowances. We request that Tables 1, 2 and 3 of the Proposed Plan are updated to take into account an alternative split and that paragraph 4.16 of the Proposed Plan is amended to include reference to an 85% / 15% split between the AHMA and RHMA.HFS requests that Tables 1, 2 and 3 of the Proposed Plan are updated to ensure that a consistent split between AHMA / RHMA is used instead of the current 75%/25% split for 2016-2019 and then 80%/20% thereafter.As stated above and throughout this representation, HFS supports the High Migration Scenario and an 85% / 15% split between the AHMA / RHMA, but would clarify that a secondary position to this would be the Principal Scenario in lieu of the Modified Principal Scenario. The Modified Principal Scenario is not supported at all for the reasons set out within this issue and in other HFS representations that it is not closely aligned enough to the HNDA, it is not supported by compelling enough evidence, and despite positive intentions, does not provide a positive outcome for the delivery of homes in the City Region for the plan period to 2032. |

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| **What document are you commenting on?** | Proposed Strategic Development Plan X |
| **HFS Issue 4** | DELIVERY OF NEW HOMES | **Paragraph(s)** | Paragraphs 4.11-4.13 / Table 2: Housing Land Requirement |

**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)*

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| Homes for Scotland (HFS) supports the increase of the housing supply target (HST) by a margin of 20% for the plan periods 2016 – 2032. This is in line with Scottish Planning Policy (SPP) and will provide for flexibility in the delivery of homes over this period.HFS also considers that this 20% generosity margin should be carried on for the later stages of the Plan, 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, paragraph 116).HFS believes that 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 (detailed further in HFS Issue 4 – Housing Allowances below).HFS has amended Proposed Plan Table 2 – Housing Land Requirements. HFS supports the High Migration Scenario, therefore the updated Table 2 has been provided for the High Migration Scenario based on an 80% / 20-% split between the Aberdeen Housing Market Area (AHMA) and Rural Housing Market Area (RHMA) in Appendix 2, and again based on the preferred 85% / 15% split between AHMA / RHMA in Appendix 4. Justification for moving to an 85% / 15% split is provided under HFS Issue 5 below. In addition, the appendices also look at the Principal Scenario for a comparison (Appendix 2 shows an 80% / 20% split and Appendix 4 shows an 85% / 15% split), and for completeness, the Modified Principal Scenario chosen by the SDPA has also been updated to show consistent splits between AHMA and RHMA throughout all plan periods (rather than the 75% / 25% split shown for 2016-2019 in the Proposed Plan (again with Appendix 2 showing an 80% / 20% split throughout all plan periods Appendix 4 showing an 85% / 15% split throughout all plan periods). |

**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)*

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| HFS supports the High Migration Scenario. We request that this alternative HNDA scenario is used as the basis for the HLR. We also request that Table 2 of the Proposed Plan is updated in line with a more ambitious evidence base.HFS supports a 20% generosity margin across all periods of the SDP. We therefore request that Table 2 of the Proposed Plan is updated to increase the 10% generosity in the period from 2033-2040 to 20%. We also request that Proposed Plan paragraphs 4.11 is updated accordingly to reflect a 20% generosity margin across all plan periods.HFS requests that Proposed Plan paragraph 4.12 is amended to show the total HLR based on the more ambitious growth scenario and 20% generosity margin across all plan periods. We also request that the final words of paragraph 4.12 “without resulting in an excess oversupply” are deleted. HFS does not believe this wording is necessary and could be misleading.HFS supports an 85% / 15% split between the Aberdeen Housing Market Area and Rural Housing Market area. Justification for this is explained fully under HFS Issue 5 – Housing Allowances. We request that Tables 1, 2 and 3 of the Proposed Plan are updated to take into account an alternative split.HFS requests that Tables 1, 2 and 3 of the Proposed Plan are updated to ensure that a consistent split between AHMA / RHMA is used instead of the current 75%/25% split for 2016-2019 and then 80%/20% thereafter.Appendix 2 shows the updated Proposed Plan Table 2 for different scenarios based on an 80% / 20% split, and Appendix 4 shows the updated Proposed Plan Table 2 for different scenarios based on an 85% / 15% split for reference. |

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| **What document are you commenting on?** | Proposed Strategic Development Plan X |
| **HFS Issue 5** | DELIVERY OF NEW HOMES | **Paragraph(s)** | Paragraphs 4.14-4.21 and 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)*

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| **Calculating LDP Allowances:**HFS is not clear on exactly how the LDP Allowances have been calculated by the SDPA. The Housing Methodology Paper does not provide adequate guidance to allow a full understanding of the methodology used to calculate Table 3 of the Proposed Plan.Paragraph 5.6 of the Methodology Paper states that the approach to determining the allowances is the “housing land requirement minus the established land supply”. HFS has already raised this issue with the SDPA who confirms that this is an error, which should read “effective land supply”. We request that this error is amended. With this correction, HFS supports the basic methodology of subtracting the effective housing land supply from the HLR.HFS has assumed that the SDPA has included the period from 2016-2019 as well as 2020-2032 in the calculation of the housing allowances, following the provision of further information on this from the SDPA. This is not clear from the Plan or Methodology Paper, however. The Methodology Paper confirms that the 2016 Housing Land Audit has been used as base data for the Plan. In analysing the 2016 Audit data, HFS has noticed discrepancies regarding the methodology used to calculate the Effective Housing Land Supply. HFS has used a simple methodology to calculate the programming for sites which continue on past the end of the Audit dates by extending the same programming forward until the site is complete, allowing the effective supply to be calculated without including any homes which would be delivered outwith the plan period. From recent discussion with the SDPA, however, it appears that the Authority has taken a different approach in making assumptions based on past trends. From the calculations we have made, the result of the SPDA’s approach is to falsely increase the Effective Land Supply total, which in turn results in a lower level of LDP allowances. HFS is not clear on the exact methodology employed by the Authority with regards to the Effective Land Supply, and the Methodology Paper does not provide any clarity. For clarity, the tables attached in Appendix 5 and 6 regarding the LDP Housing Allowances use the 2016 Housing Land Audit and update this to include known completions from 2017 and 2018 since the programmed assumptions on completions are no longer necessary for these years when the exact level of completions is known. **Split between AHMA / RHMA:**Homes for Scotland (HFS) acknowledges that the SDP has sought to increase the split 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. HFS believes 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.HFS has produced updated Tables 1, 2 and 3 (see Appendices 3, 4 and 6) to show the housing supply target (HST), housing land requirement (HLR) and Local Development Plan (LDP) housing allowances for the preferred High Migration Scenario, and also for the Principal Scenario for comparison, and a corrected Modified Principal Scenario to have consistent splits across all plan periods (as opposed to 75% / 25% split for the 2016-2019 period in the Proposed Plan tables).Paragraph 6.6 of the methodology Paper states that 45% of the identified housing land supply in the RHMA is constrained. This points to an issue of land 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 RHMA is not a particularly marketable location when compared with the AHMA which has very few sites constrained by marketability.Paragraph 6.7 of the Methodology Paper goes on to state 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 market is not able to sustain this level of allocations and is more focussed on sites for small scale delivery (2 or 3 homes). HFS suggests this to be 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.An extra line has been added to the tables in Appendices 5 and 6 to show the Additional Allowance for the Aberdeenshire Council part of the AHMA, which we believe to be a useful addition which provides greater transparency and clarity, and one that does not currently appear in Table 3 of the Proposed Plan.**Scale of Allowances:**Comparing the updated Table 3 based on the Modified Principal Scenario and Table 3 based on the Principal Scenario (Appendix 5 and 6 based on different splits between AHMA / RHMA), the Principal Scenario provides for increased Allowances. This is because, as detailed under HFS Issue 2, the result of the modification to the Principal Scenario is to push over 1,000 homes out of the 16-32 period into the later plan period for which allocations do not require to be made. Again, applying the High Migration Scenario provides higher still Allowances.**Scale / Location of Allocations:**In terms of location and scale of allocations, HFS would support a range of scale and locations of sites to be allocated across the City Region in places where people want to live, and in marketable locations where home builders can see a return on their investment. |

**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)*

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| HFS supports the High Migration Scenario. We request that this alternative HNDA scenario is used as the basis for the HLR and therefore the LDP Housing Allowances. We also request that Table 3 of the Proposed Plan is updated in line with a more ambitious evidence base.HFS supports an 85% / 15% split between the Aberdeen Housing Market Area and Rural Housing Market area. Justification for this is explained fully under HFS Issue 5 – Housing Allowances. We request that Tables 1, 2 and 3 of the Proposed Plan are updated to take into account an alternative split. HFS requests that paragraph 4.16 of the Proposed Plan is amended to include reference to an 85% / 15% split between the AHMA and RHMA.HFS requests that Tables 1, 2 and 3 of the Proposed Plan are updated to ensure that a consistent split between AHMA / RHMA is used instead of the current 75% / 25% split for 2016-2019 and then 80% / 20% thereafter.HFS requests that Table 3 is updated to include a line showing the Additional Allowances for the Aberdeenshire part of the AHMA.HFS requests that paragraph 4.15 of the Proposed Plan is amended to remove the text “*As such, it is possible that no further housing land allocations could be made for the next Local Development Plans*”. HFS believes that the delivery of strategic allocations from the last LDPs is clearly set out within the annual Housing Land Audit. Analysis of the 2016 Audit used by the SDPA for his Plan shows that, contrary to this statement in paragraph 4.15, new allocations will be required within the forthcoming LDPs, and HFS supports the inclusion of a table of Housing Allowances to direct the LDPs on the level of new housing they will have to plan to deliver.HFS requests that the Housing Methodology Paper is amended to change reference in paragraph 5.6 to the “Established Land Supply” to “Effective Land Supply”.As stated above and throughout this representation, HFS supports the High Migration Scenario and an 85% / 15% split between the AHMA / RHMA, but would clarify that a secondary position to this would be the Principal Scenario in lieu of the Modified Principal Scenario. The Modified Principal Scenario is not supported at all for the reasons set out within this issue and in other HFS representations that it is not closely aligned enough to the HNDA, it is not supported by compelling enough evidence, and despite positive intentions, does not provide a positive outcome for the delivery of homes in the City Region for the plan period to 2032. |

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| **What document are you commenting on?** | Proposed Strategic Development Plan XAction Programme X |
| **HFS Issue 6** | OUR FUTURE | **Paragraph(s)** | Monitoring & Reviewing this Plan Paragraphs 8.6-8.7 and Action Programme |

**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)*

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| As set out under HFS Issue 1 regarding the spatial strategy, Homes for Scotland (HFS) considers that Westhill should be added to the Aberdeen City Strategic Growth Area (SGA) and that more flexibility should be included in the plan to support new development around the new Aberdeen Western Peripheral Route (AWPR) where appropriate. Whilst this is the HFS preferred option, we acknowledge that the Proposed Plan currently does not seek to include these provisions. It does, in paragraph 8.7 however, state that it will continue to review the success of the spatial strategy. In particular it states “*This should include consideration of whether changes to the extents of the existing Strategic Growth Areas are required, or if any new locations for growth should be designated in the future, for example in the corridor west of Aberdeen. Over the next five years a range of studies will be undertaken in order to explore whether any amendments to the existing Spatial Strategy will be necessary, and this will include studies on the impact of the Aberdeen Western Peripheral Route on travel patters across the City Region*.” However, despite this commitment within the Proposed Plan, there is no specific action in the Proposed Action Programme 2018 relating to a review of the Spatial Strategy and associated studies over the next five years. This omission gives little confidence that the statement in paragraph 8.7 of the Proposed Plan will actually come to fruition, as there is no apparent intent to follow up on the claims made in the Plan with regards to reviewing the Spatial Strategy in a meaningful and timely way. |

**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)*

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| HFS requests that explicit reference is added to the Action Programme to set dates and specific actions for the review of the Spatial Strategy in line with paragraph 8.7 of the Proposed Plan, including details of the “*consideration of whether changes to the extents of the existing Strategic Growth Areas are required*”; the “*range of studies*” which will be carried out over the next five years “*in order to explore whether any amendments to the existing Spatial Strategy will be necessary*”; and detail on studies on the “*impact of the Aberdeen Western Peripheral Route on travel patterns across the City Region*”. |

**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](http://www.aberdeencityandshire-sdpa.gov.uk) or contact the Strategic Development Planning Authority on 01467 539734.