**Strategic Development Plan Review**

**Main Issues Report Consultation**

**12th March - 21st May 2018**

The Aberdeen City and Shire Strategic Development Planning Authority are currently reviewing the Strategic Development Plan for the area. Our Development Plan Scheme outlines a timetable for the review of the Plan, and also identifies where there are opportunities to participate. It is available to view at:

<http://www.aberdeencityandshire-sdpa.gov.uk/DevelopmentPlan/DevelopmentPlanSchemes.aspx>

The **Main Issues Report** is the first formal stage in the review process – it describes and invites discussion on options for future policies, as well as employment and housing land targets for the next Plan. No settled view on the content of the next Strategic Development Plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined.

**You can view a copy of the Main Issues Report on our website at:**

<http://www.aberdeencityandshire-sdpa.gov.uk/CurrentWork/CurrentConsultations.aspx>

**Copies are also available to view at all Council Offices and Libraries within the Strategic Development Plan Area.**

A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement, Housing Needs and Demand Assessment and Interim Cumulative Transport Appraisal can also be viewed on our website (by following the above link).

**How to Respond**

The Main Issues Report contains a series of issues and questions on which we would like to hear your views. Please use this form to respond to these, or any other issues raised by the Main Issues Report or any other accompanying documents.

**Consultation Responses must be received by 12pm on Monday 21st May 2018**

You can make your views heard in a number of ways:

* **By Post - please return a completed version of this form to:**

Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB

* **By Email - please return a completed version of this form to:** [team@aberdeencityandshire-sdpa.gov.uk](mailto:team@aberdeencityandshire-sdpa.gov.uk)If you choose to fill out our online Word form, please be aware that you must download the form and save any changes before submission.

Letters and emails which do not make use of this form will also be accepted, however please make sure include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing, if you would like us to be able to contact you with any queries on your submission.

**Using your Personal Information**

Information you supply to the Strategic Development Planning Authority (SDPA) by responding to this consultation will be used to prepare the next Strategic Development Plan for the area. The SDPA will not share the personal information provided in response to this consultation with other parties or organisations. The SDPA will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.   
  
The SDPA Officers may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: Claire McArthur, Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

**Contact Details**

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| ***Name (Mr/Mrs/Miss/Ms)*** |  |
| ***Organisation***  ***(if relevant)*** |  |
| ***Address*** |  |
| ***Postcode*** |  |
| ***Telephone*** |  |
| ***Email*** |  |

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Please tick this box if you wish further correspondence to be directed to this address:

**If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.**

|  |  |
| --- | --- |
| ***Name (Mr/Mrs/Miss/Ms)*** | Nikola Miller |
| ***Organisation***  ***(if relevant)*** | Homes for Scotland |
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| ***Postcode*** | EH14 1RW |
| ***Telephone*** | 0131 455 8350 |
| ***Email*** | n.miller@homesforscotland.com |

If you wish to be added to the SDPA distribution list to be kept informed of our progress in producing the next SDP, please tick this box and provide the email you wish to be added to our database (if different from above):

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Email :\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Your Views**

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

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| **Main Issue / Question Number:** | **1.Do you agree with the updated Vision as set out in the Preferred Option?** |
| Homes for Scotland (HFS) supports the overarching vision of the MIR including the ambition for the city region to grow and diversify its economy.  We suggest that a small insertion under bullet two of the vision could add to this vision, inserting "built and natural" to add clarity that both the built and the natural environments have unique qualities: "the unique qualities of our built and natural environments".  This would ensure that the vision includes mention of the importance of supporting the economies of the city region, and also its environments. | |

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| **Main Issue / Question Number:** | **2. Do you agree with the Preferred Option that the existing spatial strategy, in general terms, remains fit for purpose and should be carried forward?** |
| The MIR suggests that the existing spatial strategy of growth corridors is the Preferred Option for the new SDP. We note that there are sections detailing the Aberdeen to Peterhead corridor (page 7 of the MIR) and the Aberdeen to Huntly corridor (Page 8 of the MIR) but the southern growth corridor is ignored, and there is no mention of this corridor within the MIR. We query this approach, particularly given that the large allocations from the previous round of plans (primarily Chapleton, but also other larger allocations) have not delivered at anywhere near the rates anticipated. We consider there is a need to address this in the MIR, to provide a new preferred strategy for the delivery of homes in this strategic growth corridor, and to direct LDPs to allocate additional sites within this corridor.  The MIR notes that there is ‘one major area in Huntly which is restricted due to a range of technical issues”. We query the Preferred Option of maintaining the current spatial strategy and including this area despite acknowledgements of the significant issues here. The result will be to artificially restrict homes that could actually be delivered on the ground. Allocations should be deliverable in areas with market demand. Identifying a strategic level of housing in an area where there is a slow market will not generate the revenues required to overcome the technical constraints here.  HFS queries the reluctance to identify a western expansion corridor. The MIR acknowledges that the opening of the AWPR will have a significant effect on settlements to the west of the city (paragraph 4.8), therefore this should be considered as a viable strategic growth corridor. As this is a 25-year plan, it is not sufficient simply to state that there are education and transport issues within an area. It is clearly the role of the SDP to plan for the future and to identify strategic reserve land as a minimum, and to work with developers and the public sector to resolve any issues or barriers to delivery.  Homes for Scotland has commissioned some independent research from Aberdeen and Grampian Chamber of Commerce to support our representation to the MIR. Attached are two separate reports – a “Local Business Survey” and “Regional Context” papers. Respondents to the survey indicated interest in the western corridor being developed to help the growth in the north-east of Scotland (as well as other strategic growth areas). There is a clear link between the co-location of businesses and housing in sustainability terms.  With the spatial strategy predicated on transport corridors and strategic transport movement, the impact of the AWPR should be taken into consideration in planning future growth over the next 20-year period in the city region. Transport patterns will be significantly altered once the AWPR opens, and this will have an impact on the region. | |

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| **Main Issue / Question Number:** | **3. Do you agree with the Preferred Option that the new plan should protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development?** |
| The Aberdeen Western Peripheral Route will provide a significant contribution to easing congestion in and around the City as well as providing sustainable transportation options, and it is understood that a full appraisal has yet to be carried out on the impacts of the AWPR once opened. This is covered further in the response to question 16 below.  Homes for Scotland considers that a blanket policy restriction from development around new junctions would be too prescriptive and is not the most appropriate policy response.  We consider that longer term strategic thinking is required, and that the SDP is the ideal vehicle for providing a policy approach to this strategic thinking over the plan period to 2040. | |

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| **Main Issue / Question Number:** | **4. Do you agree that the Preferred Option for the new plan should focus on the towns of Banff, Macduff, Fraserburgh and Peterhead for regeneration** |
| The Aberdeen City Centre Masterplan is of key importance to the City and should be part of the Preferred Option for regeneration. We would stress, however, that any brownfield housing delivery should not be to the detriment of greenfield release which will be important in increasing the supply of new homes across the City Region. | |

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| **Main Issue / Question Number:** | **5. Do you agree that we should present an optimistic view of future economic growth in the new plan?** |
| Yes.  HFS agreed that an optimistic view of future economic growth should be presented in the new SDP. It is important to note that this is a strategic plan, which must take a longer-term vision and plan for the growth and success of the city region for the next 20 years.  The Strategic Development Planning Authority (SDPA) expects this Plan to be approved in 2020, therefore in accordance with SPP, the Plan covers the 20-year period to 2040. It is essential that the SDP plans for economic success and does not rely solely on recent trends to inform the long-term future of the region. Despite a recent downturn in the economy, the Plan must proactively seek to meet its Vision of an "even more attractive, prosperous, resilient and sustainable European city region and an excellent place to live, visit and do business".  Without a strong focus on an optimistic future for the city region's economy, there will be little chance of actually meeting that aim. The SDP must be positive, leading and shaping the growth of the city region. Both the survey and the Regional Context demonstrate that there is increased optimism in the Aberdeen City Region and that activity is increasing. The SDP must plan to support this increasing level of optimism over the next 20 years. It will, in effect, be self-fulfilling for the city region – if there is not an ambitious plan for growth, the region will not be able to reach and sustain optimistic levels of growth in the future. | |

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| **Main Issue / Question Number:** | **8. Is there anything more that the planning system should do to support sustainable economic growth?** |
| The SDP should explicitly acknowledge the positive relationship between home building and sustainable economic growth. The home building industry generates significant social and economic benefits through the delivery of new homes, both direct and indirect benefits.  Homes for Scotland published research in November 2015 on the Economic and Social Benefits of Home Building in Scotland. The headline figures are on a Scotland-wide basis, not on a north east specific basis but provide insight into the range of benefits of home building:   * 31,630 direct jobs created * 4.1 total jobs for every home built * £78m one-off first occupation expenditure in the local economy * £3.2bn direct, indirect and induced GVA   The attached Aberdeen & Grampian Chamber of Commerce research report “Regional Context” acknowledges that “*economic activity level in the north-east of Scotland are high*”. A higher percentage of working aged people in Aberdeen City and Aberdeenshire are economically active compared to both the Scottish and British averages. This must be supported in order to be maintained and strengthened.  Therefore, to support sustainable economic growth in the north east, the SDP must plan for growth, and plan to meet the housing need and demand identified in the HNDA, providing for a range of sizes and locations of new housing sites across the city region to allow the delivery of new homes which will support growth. | |

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| **Main Issue / Question Number:** | **10. Do you agree that the housing supply target should be based on a composite scenario rather than directly on any of the three scenarios identified in the Housing Need and Demand Assessment?** |
| No.  Homes for Scotland does not support the Composite Scenario Housing Supply Target (HST) as set out in the MIR.  Paragraph 115 of Scottish Planning Policy (SPP) states that the HST set within the Plan "*should properly reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence*".  The Composite Scenario used within the MIR as the basis of the HSTs for the Plan does not "properly reflect" any of the HNDA estimates set out within Figure 3 on Page 17 of the MIR. Whilst we acknowledge that the HST is a "policy view of the number of homes the authority has agreed will be delivered" (SPP, paragraph 115), the Composite Scenario bears no resemblance to any of the actual HNDA scenarios.  The Composite Scenario seems to be based on past completions trends rather than the evidence provided by the HNDA. This is methodology is not supported by SPP or best practice.  It is not possible to adequately ascertain the methodology used by the SDPA to reach the Composite Scenario. All other SDPs have provided a form of background or technical paper detailing the methodology and background information supporting the housing assumptions, policy decisions and estimates within the Plan at Main Issues Report Stage. This provided the basis upon which the housing sections of each Plan could be scrutinised and for an informed opinion to be drawn from this evidence. However, the Aberdeen City and Shire MIR is not supported with any evidence base. This makes the interrogation of the housing section difficult, and results in an opaque process for consultation that is not easily navigable. We therefore consider that there is no "compelling evidence" as required by Paragraph 115 of SPP to support the HSTs set out in the MIR.  HFS supports the Alternative Option set out in Paragraph 6.12 of the MIR and suggests the use of one of the HNDA scenarios. HFS proposes that Scenario 3 is used by the SDPA as the basis for setting the HSTs for the new SDP.  Scenario 3 is the most ambitious growth scenario of the HNDA. It is the only scenario which maintains the ambition of the current SDP. Page 33 of the current SDP sets out the Targets of the Plan and how these Targets will be met. The third bullet includes a Target "*To move towards building at least 3,000 homes a year by 2020 through the development plan*." Accepting either Scenario 1 or Scenario 2 from the HNDA, or the Composite Scenario proposed by the SDPA would result in an unambitious Plan which plans for less growth than the current approved SDP. By accepting growth Scenario 3, together with ambitious Housing Land Allowances, the city region can still aim towards delivering more homes per annum to meet housing need in a growth focussed, strategic approach.  As mentioned earlier, the 2015 HFS research “Economic and Social Benefits of Home Building in Scotland states that 4.1 jobs are created for every home built. In aiming towards 3,000 homes per annum, this would sustain 12,300 jobs each year in the city region. The delivery of homes is not only positive in terms of meeting the need and demand of the region as identified in the HNDA, but is also a significant driver of economic growth. There is therefore substantial merit in an ambitious approach to setting the HST and HLR.  The “Local Business Survey” Report carried out by Aberdeen & Grampian Chamber of Commerce which is submitted by HFS in support of this representation, provides interesting insight into factors affecting recruitment and retention in the region, challenges faced by businesses due to housing issues, and requirements of businesses in the region highlight a number of key issues which should be addressed in the SDP. The availability of the right type of housing in the locations where people want to live is an issue, as is the cost or affordability of suitable housing. In addition, the Aberdeen & Grampian Chamber of Commerce “Regional Context” report concludes (page 9) that the north east is an “*ambitious region that has an economy that continues to grow…” and highlights that “in terms of housing, it will be important to ensure the right balance of housing supply (i.e. type, price range, location) to meet the demands of the workforce and retain talent in the region*”. These emphasise the need for the SDP to plan appropriately to meet the needs and demand in the region.  Paragraph 118 of SPP states that SDPs should set the Housing Supply Target (HST) and Housing Land Requirement) and should "*state the amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval, making sure that the requirement for each housing market area is met in full."* We support the start date of 2016 for the HST, HLR and Housing Land Allowances as the base date of the HNDA. Since this SDP's proposed date of approval is 2020, the first period of the Plan should therefore be 2016-2032. SPP paragraph 118 goes on to state that "*beyond year 12 and up to year 20, the strategic development plan should provide an indication of the possible scale and location of housing land, including by local development plan area*". This means that the second plan period would be 2032-2040. We notice that the plan periods within the MIR follow an inconsistent pattern of periods. Table 1 includes five periods, each of five years to set out the HST. Tables 4, 5 and 6 include three periods, the first from 2016-30. It is not understood why this period does not include the final 2 years of the 12-year plan period (as set out in SPP paragraph 118).  Paragraph 6.21 describes the MIR's Preferred Option for Proposed Allowances and describes its method in terms of two local development plan periods. It states that it will 'safeguard' homes for the 10-year period beyond 2030. However, to comply with SPP, this should be from 2032 onwards. SPP paragraph 118 clearly sets out the two plan periods as the first 12 years, and then beyond year 12 to year 20. For this SDP, the periods would then be 2016-2032 and 2032-2040. By splitting the periods the way the SDP has, years 11 and 12 of the plan are not appropriately dealt with as required by SPP paragraph 118.  We suggest this is formalised in the Proposed Plan into the two periods 2016-2032 and 2033-2040 (both inclusive). This is a small change which would provide closer alignment with SPP.  HFS has amended Table 1: Proposed Housing Supply Targets based on a HST that "properly reflects" the HNDA scenario (Scenario 3), and amends the plan periods to include the first 12 year period of the Plan as the first period, and the remaining 8 years as the second period.   |  |  |  | | --- | --- | --- | | HFS Amended Table 1:  Proposed Housing Supply Targets | | | |  | **2016-2032** | **2033-2040** | | Aberdeen Housing  Market Area | 37,060 | 17,400 | | Rural Housing  Market Area | 10,268 | 4,032 | | Total | 47,328 | 21,432 | | Split as follows: | | | | Aberdeen City Council | 23,664 | 10,716 | | Aberdeenshire Council | 23,664 | 10,716 |   **\***HFS amended Table 1 based on HNDA Scenario 3 data | |

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| **Main Issue / Question Number:** | **11. Do you agree that we should assume continued funding for affordable housing at 2020/2021 levels from the Scottish Government for the whole of the next plan period?** |
| Homes for Scotland supports the continued and increasing funding of affordable housing in the city region. It is reasonable to assume that this funding will continue for the purposes of the SDP, and while funding has increased year on year to date, the levels anticipated in the SDP provide a useful guide, given that availability of funding is not confirmed on a long-term basis. | |

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| **Main Issue / Question Number:** | **12. Do you agree that significant generosity should be included in the early years of the plan but, for the later periods, no generosity should be added? This would be subject to review in future plans.** |
| No.  Homes for Scotland does not consider that the approach taken by the SDPA to include 20% generosity to 2030 and then no generosity thereafter to be compliant with Scottish Planning Policy (SPP).  SPP Paragraph 116 states that the HST "should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided". While SPP goes on to clarify that "the exact extent of the margin will depend on local circumstances", there is no explicit provision for the Plan to provide no generosity for part of the plan period. We do not consider the approach taken by the SDPA to be compliant with the provisions of SPP.  Furthermore, the final part of SPP Paragraph 116 states that "a robust explanation for it should be provided in the plan". There is very little explanation within the MIR regarding the level of generosity provided. Paragraph 6.18 deals with the explanation of generosity. In explaining the reasoning behind a 0% generosity beyond 2030, the final 3 lines of this paragraph are relevant. This states that "a large element of generosity is likely to be carried forward from the earlier period". HFS does not consider this to be a 'robust explanation', nor does it consider this explanation to be adequate to allow for no generosity from 2030 onwards. SPP does not stipulate that generosity can be carried forward from one period to the next, it requires that the overall HST is increased by a margin of 10 to 20% to establish the HLR.  In addition, the MIR states that "*there will be opportunities to review the need for housing in this period before it is needed*". HFS objects to this approach. Under the current legislative system, the SDP, once approved, will guide the preparation of Local Development Plans (LDPs) for both Aberdeen City and Aberdeenshire Councils. The current planning system makes no provision for the SDP to be updated on an interim basis, therefore the next opportunity to update the HLR would be at the time of the preparation of the next SDP. Of course, with ongoing planning reform, and the expected removal of SDPs as a tier of plan making, there may not be a further SDP as a formal plan for this city region, therefore it is even more uncertain when there will be an opportunity to review the need for housing in the period post 2030. This will not be clear until the Planning Bill is enacted, and secondary legislation / guidance provide further detail on the exact procedures going forward, and the dates for the implementation of the new system. It is inappropriate for the SDP to identify 0% generosity post-2030 and for the reasoning provided to state that this could be subject to change in the future. This SDP must set out the "*amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval*" in accordance with SPP Paragraph 118, which is to 2032 for this SDP, and further it must "*provide an indication of the possible scale and location of housing land*" beyond year 12 up to year 20.  We query the methodology in providing 20% generosity up to 2030 and then nothing after this. The expected date of approval of the plan is 2020, therefore from this date to year 12 (the period defined by SPP) takes us to 2032, not 2030. No justification is provided within the MIR, therefore it is not possible to understand the reasoning behind the authority’s methodology here.  It is important to remember the reasoning behind the generosity margin. It is accepted that as the plan moves on, some land may not come forward for development at the rate anticipated. This has been experienced in recent years with the large allocations in the City and Shire (Chapleton for example) which are not delivering completions at the rates anticipated in the LDPs for a number of reasons. Therefore, a flexibility margin in the form of 'generosity' is an important inclusion to ensure that a generous supply of land is allocated in LDPs that will follow on from this SDP. This generous supply of land will ensure that enough homes can be delivered across the life of the Plan to meet the need and demand for new homes identified in the HNDA.  HFS has updated Table 4: Proposed Housing Land Requirements to provide the 20% generosity as included in the MIR but extending this over the plan period to 2040 to ensure that generosity is applied over the whole plan period.   |  |  |  |  | | --- | --- | --- | --- | | HFS Amended Table 4:  Proposed Housing Land Requirements | | |  | |  | **2016-2032** | **2033-2040** | **TOTAL** | | Aberdeen Housing  Market Area | 44,472 | 20,880 | 65,352 | | Rural Housing  Market Area | 12,322 | 4,838 | 17,160 | | Total | 56,794 | 25,718 | 82,512 | | Split as follows: | | | | | Aberdeen City Council | 28,397 | 12,859 | 41,256 | | Aberdeenshire Council | 28,397 | 12,859 | 41.256 |   \*HFS Table 4 based on HNDA Scenario 3 data with 20% generosity added from 2016-40 | |

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| **Main Issue / Question Number:** | **13. Do you agree that our Preferred Option should allow Local Development Plans to make some further housing allowances?** |
| Yes. Homes for Scotland agrees that further housing allowances should be made by future Local Development Plans.  We query the level of allowances set out within the MIR. In line with the amended HFS Table 1 and Table 4 promoting a more ambitious approach to growing the economy of the Aberdeen city region, ensuring that housing need and demand within the HNDA is met through the lifetime of the SDP, and recognising the home building industry’s ambition and support to increase the supply of homes across the region, the allowances should be set at a more ambitious level.  We query the use of the 2016 Housing Land Audit in the MIR. This is not the most up to date evidence base for the existing effective housing land supply in Aberdeen City and Shire. At the time of publication of the MIR, the 2017 Audit had been agreed and was publicly available. We consider this Audit should have been used for the purposes of the MIR as the most up to date evidence base available at the time.  We will soon be in a position to agree the 2018 HLA, therefore we expect the Proposed Plan to be based on this Audit as the most up to date evidence base upon which to calculate proposed allowances in Table 6.  HFS has amended Table 6: Proposed Allowances based on the amended Table 4. It was, however, difficult to properly scrutinise the evidence base of Table 5 which is integral to the preparation of Table 6 as the background evidence was not initially available. We request that the background evidence base is made publicly available to provide greater transparency and a robust evidence base for the MIR.  The table below reflects the difference between the effective land supply at the 2016 Housing Land Audit and the amended Proposed Housing Land Requirements (HFS Amended Table 4).   |  |  |  |  | | --- | --- | --- | --- | | HFS Amended Table 6:  Proposed Allowances  (land to be identified beyond the 2016 effective supply) | | |  | |  | **2016-2032** | **2033-2040** | **TOTAL** | | Aberdeen Housing  Market Area | 16,576 | 17,423 | 33,999 | | Rural Housing  Market Area | 3,907 | 3,562 | 7,469 | | Total | 20,483 | 20,985 | 41,468 |   Because of the lack of an associated technical paper to support the MIR, it is very difficult to work out the split between Aberdeen City and Aberdeenshire Councils of the housing allowances, and there is no explanation given at all as to the rationale for this split. In discussions with the SDPA team, it seems that the splits have been based on historical splits in previous plans, however we consider that a wider discussion should be undertaken with stakeholders to ensure that the splits between housing market areas and authority areas are reasonable and reflect the aspirations for the delivery of homes in these areas. | |

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| **Main Issue / Question Number:** | **14. Do you agree that any new greenfield allocations should preferably be under 100 houses in size?** |
| No.  Homes for Scotland is concerned about this overly prescriptive Preferred Option. We support a range and choice of sizes and locations of sites to be allocated in LDPs, and do not consider the role of the SDP to be as prescriptive as this proposal. The LDPs themselves should provide this range of sites to meet the HLR set in the SDP.  We query the statement in paragraph 6.25 which suggests that these smaller sites will "*aim to deliver affordable housing above 25%*". SPP Paragraph 129 sets out details on affordable housing provision and states that "*the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses*". Further, the MIR itself in Paragraph 6.17 states "*we do not expect to ask Local Development Plans to increase the 25% obligation for affordable housing from private-developer sites*". We therefore seek clarification of the text in Paragraph 6.25. | |

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| **Main Issue / Question Number:** | **16. Do you agree that the next Strategic Development Plan should continue to identify regionally significant long-term transport projects and cumulative transport interventions?** |
| Homes for Scotland notes that the spatial strategy of the SDP is predicated on major transport corridors and movements. These will change significantly in the next 12 months with the opening of the Aberdeen Western Peripheral Route.  The MIR notes (paragraph 9.6) that the timing of the Strategic Transport Appraisal currently being carried out means that “its output will inform future plans rather than this one”. Whilst we understand the difficulties in timing of this appraisal, its outputs are critical to the success of the SDP. It would be useful to have more clarity on the timescales for the preparation of this work, and expected date of publication, and how it might fit in with the timescales of the SDP. It may be pertinent to pause progress on the SDP to allow for this important study to be finalised to properly inform the preparation of the Proposed Plan.  Whilst the Planning Bill proposes the removal of SDPs and there is a time pressure to have this Plan approved prior to the removal of this tier of plan making, it is misleading and short-sighted to assume that ‘future plans’ will deal with the Strategic Transport Appraisal when this plan covers a significant period of time to 2040, and we do not yet know the future structure of plan making in Scotland post-planning reform. Indeed, given the Parliamentary Local Government & Communities Committee’s Report on Stage 1 of the Planning Bill highlighting uncertainty over the removal of SDPs, the future of regional planning is even less clear, and therefore it is in all parties’ interests to have this SDP progressed fully in a ‘business as usual’ manner to approval until Parliament and Scottish Government indicate otherwise.  Any long-term strategy such as the SDP which does not account for permanent and significant changes in traffic distribution is premature and will not represent the transport infrastructure position of the city region in the near future.  There is an opportunity for this SDP to anticipate likely improvements that will be required, as part of a future ‘bid’ for the funding to carry out such improvements in the future if the SDP becomes part of the new National Planning Framework, ensuring that the needs of the north east are clearly set out to link in with future national government capital plans. | |