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I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

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Which document(s) are you committing on?	Main Issues Report	X
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Your comments

Main Issue 1 – Vision

Homes for Scotland (HFS) supports a strong vision for the Local Development Plan (LDP) which sets the tone for the Plan, and the delivery of more homes in the Aberdeenshire region to meet the need and demand which exists.

We note that the Main Issues Report (MIR) preferred option is to maintain the existing vision from the current adopted LDP but to provide further guidance on the value of that vision. We support greater explanation of how the vision relates to the policies within the plan, to provide a clear link between the two, but do not believe that the vision should be over complicated and detailed.

Any guidance to support understanding of the vision should be clearly differentiated from the broad, strategic vision itself. However, the draft Proposed Plan appears to show an amended vision in pages 6-9 and it is not clear whether the Council considers this amended vision to be the provision of 'guidance on the value of the vision' or whether it is simply an amended vision. It would be useful to have a clear differentiation between the vision itself and any guidance to support it within the Proposed Plan.

Main Issue 2 – Spatial Strategy

HFS largely supported the Spatial Strategy as set out within the Proposed Strategic Development Plan (SDP), with suggested changes made to extend the boundary of the Aberdeen SGA to include Westhill, or to create a new SGA to the west of Aberdeen, and to remove reference to resisting new development adjacent to the AWPR. HFS would support the LDP aligning with the SDP's spatial strategy but maintaining the statements for each administrative area to acknowledge the different and distinct character of each area. Without the identification of the six areas, the needs of each area become diluted into transport corridors, which do not necessarily reflect the different characters of each area. For example, areas such as Westhill and Banchory could, without the different administrative area statements, become part of "other locations" alongside Banff and Portsoy which clearly have very different drivers and characteristics. HFS supports the alternative option.

Main Issue 5 – Green Belt

HFS does not support any extension to the green belt in Aberdeenshire, and therefore does not support the 'alternative option' in Main Issue 5. HFS supports the 'preferred option' that no changes should be made to Green Belt policy at this time.

We consider an extension to the north and west of Westhill could be particularly detrimental given the significant development potential that Westhill has, and the substantial market demand for homes and supporting facilities in this area. The Proposed Strategic Development Plan clearly shows Westhill as excluded from Green Belt, therefore the SDP does not provide any basis for a Green Belt review.

Future development potential should not be obstructed in this part of Aberdeenshire through an unnecessary Green Belt review and potential extension. It is entirely appropriate that new areas are allocated for development through an LDP review whether these areas are existing areas of Green Belt or in other uses. In reviewing LDP allocations and policy, authorities across Scotland allocate sites within existing Green Belt areas following a plan-led consideration of the most appropriate locations for development. Scottish Planning Policy (SPP) paragraph 49 states that "*for most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations*".

It is unclear why a review of driver behaviour following the opening of the AWPR would have any relation to a future Green Belt review.

HFS believes that any future Green Belt review must be done on a collaborative basis, engaging all interested parties in the process, which is done within a strategic context as set out by a Strategic Development Plan. For the avoidance of doubt, there is no strategic context for such a review at the present time.

Main Issue 7 – Rural Areas

Main Issue 7 relates to the reclassification of urban/rural areas with the preferred option being to use the Scottish Government's Six Fold Urban Rural Classification to define accessible and remote areas for the application of the LDP rural policy. HFS is concerned that no explanation has been provided for this preferred option, and the implications are not made clear within the MIR text.

The MIR text states that "a number of options have been looked at". These are not detailed with benefits / threats outlined and a preferred option chosen at the end of this assessment. HFS requests that further information is made available to justify the preferred option for this Main Issue.

The MIR text confirms that the authority does not support the use of housing market areas as the boundary between "accessible" and "remote" areas within the LDP. Other than indicating that the HMAs do not reflect transport network improvements since the 1980s, no explanation or evidence base is provided to support the Council's position.

No detail is given to demonstrate to respondents what the implications for rural policy will be of amending the classification and boundary between "accessible" and "remote". This is an important change for the Plan and should be afforded more explanation to allow respondents to support the preferred or alternative option, or to provide a different option.

Main Issue 8 – Organic Growth

HFS supports home builders at all scales across Scotland, from small-scale home builders to larger builders, and in turn the range of sizes of sites each builder will prefer. It is essential that the LDP does not limit the potential for delivery of any home builder. HFS acknowledges the loss of a significant proportion of the small-scale home building sector during the recession and is working to support new entrants to the market, and the re-entry of existing small-scale home builders to support the delivery of homes at all scales across Scotland. Organic growth of settlements can be a successful way of providing development opportunities for small scale home builders, whilst contributing towards the need and demand for homes in smaller settlements which may not have specific housing land allocations. HFS would like to see support for small-scale home builders built in through LDP policy to support the range and choice of locations and sizes of housing site opportunities available, which will in turn support the delivery of homes needed in Aberdeenshire over the plan period.

School capacity can be a successful way of directing smaller scale development to settlements, utilising existing education infrastructure which is currently under capacity rather than requiring interventions such as extensions, new schools or catchment reviews. HFS considers that the capacity of schools should remain a consideration for the organic growth policy.

We query the restriction of growth to within 200m of the settlement boundary. No evidence has been provided to justify the 200m limit, nor is any text provided to explain this choice, meaning that seems arbitrary.

Main Issue 9 – Brownfield

HFS would support an additional opportunity for the redevelopment of brownfield sites, increasing from “small-scale” development. We query the evidence base for the selection of 7 homes as the maximum redevelopment of a ‘larger’ brownfield site over the plan period. Why was 7 considered most appropriate? Is there a more positive way of supporting the delivery of brownfield sites in a more flexible way which would encourage an appropriate number of homes depending on the nature of the site in question?

Main Issue 10 – Housing Density

HFS recognises that current indicative capacities and a 22 dwelling per hectare indicative density perhaps does not reflect reality in all cases throughout Aberdeenshire. However, the inevitable effect of increasing the indicative density on sites across the plan area is that fewer new homes are required to be allocated. HFS does not consider the way to plan for new homes is to simply increase the density on existing sites to reduce the number of additional sites that are required. This is an unrealistic and overly simplistic approach which does not support the delivery of a range and choice of sizes and locations of sites within the emerging LDP. It is essential that sites allocated within the LDP for housing development are deliverable, and as such, cognisance should be given to the submissions made by home builders at the call for sites stage to ensure that there is a range and choice of land available for housing within the LDP to meet the defined need and demand for homes over the plan period. Home building is a significant positive driver of economic growth and must be supported through the LDP where home builders have promoted viable sites which are deliverable within the plan period, rather than relying on an over simplified method of increasing densities on existing sites to meet the housing allowances. In some cases, the capacity of sites has been doubled from bids submitted at the Call for Sites stage, but no evidence has been provided to any consideration of implications of this, such as the need for a second point of access to the site for example.

The Proposed SDP sets a density of no less than 30 dwellings per hectare in the Strategic Growth Areas across the City Region. It is unclear how the preferred option in the MIR aligns with the SDP policy on density and how each will be achieved. We believe that new higher densities should not be retrofitted to existing sites, simply to serve the purpose of increasing in the number of homes on that site to prevent the allocation of additional new homes through the LDP review process.

It is not clear how the 40% open space requirement and other policy requirements (such as EV charging points) have been taken into consideration in this revised indicative density. In particular, with 40% of any site requiring to be open space, this has a considerable impact on the land available for homes, and therefore the densities that can be achieved on site will be very different to the indicative densities identified within the Plan. Many submissions to the call for sites stage of the LDP preparation were made by home builders, and these indicative densities will be based on what that home builder believes it can reasonably achieve on the site. It seems counterintuitive for the authority to amend indicative densities at this stage on sites in control of home builders, and instead it would be more beneficial for the authority to await the detailed design at Development Management stage.

HFS believes that there should be flexibility on the density of sites within Aberdeenshire given the varying nature of the authority area, allowing for higher densities to come forward where settlements and sites will allow, and lower densities to be acceptable in other locations and sites which could not support higher densities. Density is an important part of the design process for any housing development, with consideration given to optimising the density of the site and ‘fit’ with the existing urban scale of the locality on a site by site basis, in line with LDP policy on design. The word “indicative” is key, and we acknowledge that this has been taken on board within the draft Proposed Plan which mentions that settlement statements are indicative. The LDP should be flexible enough to support and encourage the delivery of allocated sites and be adaptable to facilitate this development coming forward from the range of different home builders operating in the authority area at different scales. The indicative nature of the allocated site densities could be reiterated within each settlement statement to ensure that it is clear the numbers are not absolute, and may be subject to change (either increasing or decreasing) on a site by site basis as that site is progressed by a home builder.

Main Issue 11 – Affordable Housing

Scottish Planning Policy (SPP) 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” (paragraph 129). As such, HFS supported the proposed SDP which was in line with SPP in stating 25% affordable housing contributions, and we would support a level of 25% within the Aberdeenshire LDP. It is important that the Plan acknowledges the significant contribution that the private sector makes to the delivery of affordable housing in Aberdeenshire. As acknowledged by the Aberdeenshire Affordable Housing Forum, over 70% of Aberdeenshire’s affordable housing is delivered through Section 75 contributions made by the affordable housing contribution from market sites. Therefore, there is a fine balance to encouraging the delivery of market homes (of which there is also a defined need and demand) which will, in turn, support the delivery of affordable homes in Aberdeenshire through the affordable housing policy.

There may be opportunities for some 100% affordable developments by housing associations and other home builders which could come forward given the appropriate levels of funding and depending on the market in different areas, and there could also be an opportunity in some instances for the level of affordable housing to be increased on a site. This would be promoted on a site by site basis by home builders and affordable housing providers, therefore we query the effectiveness of including any wording specifically within an affordable housing policy on encouraging more than 25% affordable housing, when the requirement is 25%. This would be more appropriate as an aspiration of the authority and set out within the supporting text. It should not in any way be asserted that the percentage of affordable housing provided by market sites should be increased from 25% as this would be contrary to the SDP and also SPP, and would not necessarily deliver more affordable homes in the area as the viability of a number of sites would be under question if this percentage was to increase.

To address current areas of pressure for affordable housing, based on the Council waiting lists, housing allocations (on an all tenure basis) must be made in areas such as Portlethen, Westhill, Inverurie, Stonehaven and others to allow the delivery of market homes to support the delivery of affordable housing, and address some of the outstanding need in these areas.

Main Issue 12 – Design Guidance

HFS does not consider that design guidance is necessary in this instance as there is an existing suite of guidance at national level which supports the delivery of developments at the local level. Design is already a material consideration (as confirmed in PAN 68 which states that “*design is a material consideration in determining planning applications...*”) and therefore additional guidance is not required to support this.

In addition, the inclusion of guidance which provides a detailed interpretation of the six qualities of successful places would introduce a further element of duplication of Building Standards to planning policy. Two of the six qualities are met through requirements under Building Standards, therefore should not form part of planning policy.

New homes are already designed to be adaptable to the changing circumstances of occupants. Building Standards (since 2007) has incorporated Housing for Varying Needs and Lifetime Homes Standards (bar two aspects). Furthermore, Building Standards already sets out the regulatory context for addressing resource efficiency matters. It has driven change in energy efficiency and carbon reduction with the latest standards representing a 75% reduction in carbon emissions and an average estimated energy bill one third that of the national average. New homes are already designed to respond to local climatic factors through the use of SAP and wider design tools. It is therefore simply not necessary to include a Design Appendix within the LDP to deal with these significant aspects of design already covered by another regulatory function.

It is not clear whether this proposed design guidance will be statutory Supplementary Guidance. Whilst ongoing planning reform may result in the removal of statutory Supplementary Guidance, this has not yet been formally accepted as part of the planning system, therefore is still a viable option for this Plan. The MIR states that the guidance will form part of the LDP and would have ‘significant materiality’. We request further information on how this guidance will be a formal part of the LDP if it is not statutory Supplementary Guidance. At this stage, the Planning Bill has not yet been finalised, therefore we do not have certainty on

what it will include, nor do we have timescales for the implementation of planning reform as secondary legislation and guidance remain to be produced.

HFS supports the alternative option of not including a new appendix relating to design. We do not support any addition of prescriptive guidance which would, by nature, be contrary to the subjective nature of design. Discussion between the applicant and the planning authority on design is an important aspect of the application process depending on the size, character and location of the particular development, especially in a large and varied authority such as Aberdeenshire.

Notwithstanding the HFS position in support of the alternative option, if any design guidance is prepared, this should be published for consultation along with the Proposed LDP to ensure opportunity for comment, and also ensuring that the guidance is scrutinised at Examination.

Main Issue 13 – Open Space

HFS does not support substituting the term 'should' for 'must' in relation to the delivery of open space. We also believe the 40% requirement for open space is overly onerous and should be reconsidered to be at a more reasonable level within the Proposed Plan. Currently, however, if a development provides under 40% open space but makes provision for alternative meaningful open space provision elsewhere, then this will be considered by the authority. The Parks and Open Space Strategy (2011) notes that there is flexibility in the provision of open space and that open space can be delivered across a network of sites, or where the Open Space Audit identifies a shortfall in provision, that contributions towards existing open space may be appropriate. This is a far more acceptable and flexible approach which is responsive to different site-specific issues and should be maintained within the emerging LDP by maintaining 'should' rather than changing this to 'must' which removes all flexibility.

HFS supports the alternative option to maintain the open space policy without the proposed amendment, subject to a review of the 40% requirement. It is important to understand how the potential new obligation for public open space will relate to the potential increased density on sites to ensure that policies are interlinked and deliverable. The MIR does not provide such detail.

Rather than the proposed additional text within the preferred option, HFS believes it is more appropriate for the phasing of strategic landscaping to be set out on a flexible and case by case basis though conditions rather than imposing obligations within the policy text for early implementation of open space requirements which may not always be the most appropriate way to deliver these on sites.

Main Issue 16 – Using Resources in Buildings

HFS believes that the LDP should not duplicate or seek to extend Building Standards requirements. In this case, the current LDP refers to gold standard which is over and above existing Building Standards requirements, and therefore a move to platinum standard would be far in excess of the obligations of Building Standards currently and is not an approach replicated in other authorities across Scotland currently. The latest Building Standards (2015) sets out cost-optimal levels of regulation for Section 7: Sustainability at Silver Active Level. Setting targets beyond this means going beyond a recognised limit of regulation (creating additional burdens on business) and furthermore duplicating a policy function addressed elsewhere in regulation.

Gold and Platinum levels are aimed at those intent on pushing sustainability levels to the limit of what is currently feasible. In that context, only one of the eight aspects contained under the Platinum Level has actually been defined. HFS considers it unreasonable to apply a standard which hasn't fully been scoped or reviewed to date.

We do not believe that planning policy should infer a responsibility to impose regulation that is addressed elsewhere (in this case Building Regulations and specifically Section 6: Energy and Section 7: Sustainability of the Technical Handbooks). Building Standards provides a more robust and adaptable framework to encourage CO2 reductions and promote energy efficiency which is more able to take into account the practical application of technological solutions.

Given that the fabric of a building is not an issue over which the planning system has control, planners as professionals do not have the skills required to assess energy statements and other technical submissions which may be required at application stage. This, again, would be a matter for Building Standards and appropriately qualified chartered surveyors.

Members have indicated that it is debatable whether platinum standard can actually be achieved using current existing mainstream technology. In addition, there are significant additional costs which would be associated with attempting to achieve anywhere near a platinum standard which would, in many cases, render a site unviable resulting in a large number of developments across the region being undeliverable.

In addition, Scottish Government research has indicated that meeting the 2015 Building Standards would increase capital costs (on average) by 6.2%. This value will range depending on the housing typology within the development. Going above the baseline levels of regulation is noted within the research to incur further costs; 11.2% to meet Silver and 27.7% to meet Gold. Given that Platinum has not yet been fully scoped, the cost increase is unknown. HFS does not believe it is reasonable to adopt Platinum standard which would add so significantly to the capital cost of the delivery of a new home, particularly at a time when we need to be markedly increasing the number of new homes delivered year on year across Scotland to address the housing crisis.

We agree that a 'fabric first' approach should be acknowledged within the policy and would support the removal of the text relating to clearly demonstrating that no suitable low and zero carbon generating technologies are appropriate as suggested in one of the alternative options under Main Issue 16.

HFS does not support the preferred option of referring to platinum standard, nor do we support maintaining the current policy unaltered. HFS would support deleting substantial parts of the policy and reverting to using only the Building Regulations to provide substance to paragraph 3F of the Climate Change (Scotland) Act 2009. HFS recommends that the final alternative option is adopted.

Main Issue 18 – Providing Suitable Services

HFS members have indicated that in some circumstances, it will be appropriate to include electric (EV) charging and hydrogen refuelling facilities within their developments, however we do not consider that a blanket policy should be introduced to require these facilities in all housing developments.

Distribution network operators have noted concerns regarding the ability of their network to accommodate the peak energy loads for EV charging. Therefore, the inclusion of an LDP policy requiring 100% of new housing developments to provide for EV charging may exacerbate such issues and require significant network reinforcement if undertaken at scale.

It is unlikely that hydrogen charging points will be appropriate for residential sites, given it is an intended fuel source for longer-distance transit / public transportation as opposed to electric vehicles which will be more commonplace in the domestic market. We therefore do not support the inclusion of any reference to hydrogen refuelling facilities in relation to residential development within the LDP.

In addition, Building Standards is already considering requirements and standards around EV charging points as part of its review for the next set of Standards which will come into effect in 2021. It is essential that planning policy does not result in pigeon-holing of current technology, which is continuously evolving, adding potentially unreasonable costs to developers to install technology which may not be suitable in the future. Planning policy should not be used to duplicate or pre-empt what Building Standards requirements are or will be and must be cognisant of grid capacity issues to ensure that policies are achievable.

A more appropriate approach would be to ensure that housing and other development sites are adaptable to allow retrofitting of renewable technologies where appropriate rather than requiring all new housing developments to include such technology. A more flexible policy within the LDP would avoid current unknowns such as timescales for grid capacity upgrading, issues of expected battery life increases resulting in fewer domestic EV charging points being required, and other issues to render the policy undeliverable,

ensuring that the LDP is more able to adjust to technological advances in the future. HFS agrees with the MIR's statement that "the planning system shouldn't facilitate this independently from other measures". Given that Building Standards is already looking into this issue in more detail, the alternative option would be more appropriate.

General

HFS acknowledges that the housing land requirement, housing supply target and LDP allowances for Aberdeenshire are set by the Aberdeen City and Shire Strategic Development Plan, however we consider that housing supply should still be a main issue within the MIR to ensure that full discussion and consideration is given to all aspects of housing supply, including the proposed allocations, the approach to allocating land taken in the LDP despite the setting of the actual housing numbers as part of the strategic plan.

HFS understands that the housing land requirement (HLR), housing supply target (HST) and additional allowances for the new LDP will be set by the Strategic Development Plan (SDP). We believe that it would be beneficial for continuity from the SDP to the LDP, and also for clarity and transparency, for the HLR, HST and allowances to be clearly set out within the Plan. The Proposed SDP sets a split between the Aberdeen Housing Market Area (AHMA) and Rural Housing Market Area (RHMA) of 80% / 20% as set out in the Proposed SDP. We acknowledge that this split will be set by the SDP but would note that the HFS representations to the Proposed SDP promoted a further increase in the split, to an 85% / 15% split, with justification for this further increase provided in our representation (see attached as appendix). It will therefore be for the Reporter(s) to determine, through the SDP Examination process, what the split should be. It may be that a further amendment is required to the draft plan as a result of the Examination process in due course.

Furthermore, HFS also supported a different methodology for the calculation of the LDP allowances within representations to the proposed SDP and provided alternative tables showing this alternative methodology, which would, if accepted by the Reporter(s) during the SDP Examination, amend the housing land requirement, housing supply target and the resulting LDP allowances for both the AHMA and RHMA. The HFS representations to the proposed SDP are attached as an appendix to this submission for information. As with the housing market area splits, it may be that the allowances themselves are amended as a result of the examination of unresolved representations in the coming months.

Which document(s) are you committing on?	Draft Proposed Aberdeenshire Local Development Plan	X
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Your comments

General

Homes for Scotland (HFS) understands that the motivation behind producing a draft Proposed Plan at the same time as the Main Issues Report (MIR) was published for consultation was to provide clarity and to pre-empt the potential change as a result of planning reform in coming years to have a draft plan. However, HFS considers that the publication of a draft plan alongside the MIR has, in fact, caused greater confusion rather than adding clarity and transparency. It appears that despite the main opportunity for comment on the LDP currently being the statutory MIR process, the Council has already taken forward its own preferred options into a draft plan, which appears to undermine the MIR consultation process, and make the preferred options for each Main Issue seem like a fait accompli since there is already a draft plan containing the Council's preferred direction for the plan. It is acknowledged that Elected Members have not ratified this draft plan and that the Council has acknowledged that (unlike the current process where the Proposed Plan is the settled will of the authority and is unlikely to be amended following the consultation period) this draft plan will be amended, it still sends a message of the plan being further along than it should be at this stage in terms of preparation.

Vision

We note that the MIR preferred option is to maintain the existing vision from the current adopted LDP but to provide further guidance on the value of that vision. We support greater explanation of how the vision relates to the policies within the plan, to provide a clear link between the two. However, the draft Proposed Plan appears to show an amended vision in pages 6-9. It is not clear whether the Council considers this amended vision to be the provision of 'guidance on the value of the vision' or whether it is simply an amended vision. It would be useful to have a clear differentiation between the vision itself and any guidance to support it within the Proposed Plan.

Spatial Strategy

HFS understands that the housing land requirement (HLR), housing supply target (HST) and additional allowances for the new LDP will be set by the Strategic Development Plan (SDP). We believe that it would be beneficial for continuity from the SDP to the LDP, and also for clarity and transparency, for the HLR, HST and allowances to be clearly set out within the Proposed Plan. An additional table could be added alongside Table 1 on Page 10 of the draft Proposed Plan to demonstrate the HLR and HST.

The draft Proposed Plan notes the split between the Aberdeen Housing Market Area (AHMA) and Rural Housing Market Area (RHMA) of 80% / 20% as set out in the Proposed SDP. We acknowledge that this split will be set by the SDP but would note that the HFS representations to the Proposed SDP promoted a further increase in the split, to an 85% / 15% split, with justification for this further increase provided in our representation (see attached as appendix). It will therefore be for the Reporter(s) to determine, through the SDP Examination process, what the split should be. It may be that a further amendment is required to the draft plan as a result of the Examination process in due course.

Furthermore, HFS also supported a different methodology for the calculation of the LDP allowances within representations to the proposed SDP and provided alternative tables showing this alternative methodology, which would, if accepted by the Reporter(s) during the SDP Examination, amend the housing land requirement, housing supply target and the resulting LDP allowances for both the AHMA and RHMA. The HFS representations to the proposed SDP are attached as an appendix to this submission for information. As with the housing market area splits, it may be that the allowances themselves are amended as a result of the examination of unresolved representations in the coming months.

The Proposed SDP provides an opportunity for “Strategic Reserve” land to be considered for longer term housing. Paragraph 4.20 of the Proposed SDP states “LDPs may choose to make provision for additional Strategic Reserves for Housing for the period of 2033 to 2040, but this is not a requirement”. HFS notes that Aberdeenshire Council does not make provision for any “Strategic Reserves” within the draft Proposed Plan. Whilst we acknowledge that this is not a requirement, we suggest these could be useful to provide certainty for both home builders and communities on the potential future locations for development in the authority. Neighbouring Moray Council makes good use of its strategic ‘LONG’ allocations which are supported by the home building industry. These LONG allocations / reserved land should be allocated in marketable locations where, in the event of a shortfall in housing land, allocations in these marketable locations which can be readily delivered can be drawn down to meet that shortage.

Policy P1 – Layout, Siting and Design

A new requirement for a Design Review Process has been added to this LDP Policy within the draft Proposed Plan. This new process is not included in the Main Issues Report, and no detail is provided to explain what this process is, other than the short description within the Plan’s glossary. HFS does not consider that a new review process should be added to the Plan without adequate detail on who will be involved in the process, what each party is expected to contribute, expected costs and timescales being made available for comment as part of the consultation process. It is not possible to comment further on this proposal without appropriate detail, clarity and justification being made available for consultation.

Policy P2 – Open Space and Access in New Development

HFS does not support the high percentage of 40% open space requirement on site. This is an overly onerous requirement which is much higher than in other authority areas across Scotland. The focus should be on the quality of open space provided by new developments instead of the quantity.

Given the aims of this policy, the local authority should accept its responsibility to maintain public open spaces, ensuring that they do not pose a risk to health and safety. In that context, acknowledging responsibilities under Section 75 Agreements would be a positive start. While factoring of open spaces may provide an option in some instances, this would require that common land is shared within the title deeds of all properties within a development but would mean transferring land intended for public use into private land owned by residents of a development. No detail on the maintenance of public open spaces is provided within the draft Proposed Plan.

Policy RD1 – Providing Suitable Services

As set out in our representation to Main Issue 18, HFS does not consider that a policy should be included within the Proposed Plan requiring that all new homes include an EV charging point. There is no evidence provided by the authority as to whether grid capacity will be available in all cases to manage the significant increase in this technology, therefore there is no assurance to home builders that this significant additional cost will be justified. The draft policy itself lacks clarity as it does not provide any detail on the approach to delivering “at least one home electric vehicle charging point” for flatted development or where there is communal parking for example. HFS suggests that a blanket policy for all housing developments to provide at least one EV charging point is unrealistic, and would prefer a more flexible approach to allow home builders to provide this technology on a site by site basis where there is market demand and grid capacity, as happens now across Scotland.