

From: [REDACTED]
To: [Housebuilding](#)
Cc: [REDACTED]
Subject: CMA Housebuilding Market Study: Land Banks and Planning Working Papers
Date: 06 December 2023 13:55:41

Dear Sir / Madam,

I refer to the above consultation and would like to make the following general comments on behalf of Aberdeen City Council:

Aberdeen City Council has maintained an up-to-date Local Development Plan for many years, adopting new Local Development Plans in 2012, 2017, and most recently in 2023. These plans all include significant and ambitious proposals for new housing development, including identifying major new housing and mixed-use expansion areas and significant brownfield redevelopment sites within the existing urban area. Housing delivery rates in Aberdeen have averaged over 1,000 homes per year over the 5 years since 2018, which includes the period when delivery rates were significantly disrupted by the impacts of the Covid-19 pandemic. This delivery rate is substantially higher than the MATHLR figure listed for Aberdeen City within the recently adopted NPF4 (as referenced for comparative purposes in the working papers).

The City Council is committed to the delivery of new high-quality housing developments to meet identified needs within Aberdeen. However, within the context of the wide-ranging planning reforms that have been introduced very recently in Scotland and are only now in the bedding-in stage, we would express significant reservations about the potential for further reform in the short-term. We consider that the introduction of further planning reforms at this stage may be counter-productive and could have adverse impacts on both housing delivery and the achievement of other important planning objectives.

I trust this is helpful but feel free to get back to me if you would like to discuss our comments in more detail.

Kind regards,

[REDACTED]

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