
**CAIRNGORMS NATIONAL PARK
DEPOSIT LOCAL PLAN**

LOCAL PLAN INQUIRY 2009

EXPANDED WRITTEN SUBMISSION

April 2009

On behalf of Reidhaven Estate
OBJECTION REF: 456C
GENERAL HOUSING STRATEGY



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1 INTRODUCTION

This written submission has been prepared by Halliday Fraser Munro Planning on behalf of Reidhaven Estate. It should be read in conjunction with previous representations made to the CNPA Deposit Draft Plan and subsequent Modifications.

2 OBJECTIONS - HOUSING (LAND SUPPLY)

2.1 REPRESENTATIONS – DEPOSIT LOCAL PLAN

Halliday Fraser Munro has made the following representations on behalf of Reidhaven Estate. The core argument of the original objection was as follows:

Reidhaven Estate objects to the overall housing strategy, figures and allocations of these units and Tables 2, 3 and 4. The estimate of housing need seems to be based on a set of assumptions that are not entirely clear from the plan itself. The total additional household projection calculation to 2016 seems to be based on a low growth scenario and does not take into account the 132 units of affordable housing.

The allocation of these units in Table 4 is of key concern. Capacity in many of the intermediate (e.g. Boat of Garten, Dulnain Bridge, Nethybridge) settlements in the medium to long term shows little or no growth. It is important that future development opportunities in these settlements are identified in order to provide choice and support existing services. Reidhaven Estate do not object to the principle of a new settlement at An Cambusmore (An Camas Mor) but consider that development should also be directed to the existing settlements as well as this new settlement.

Concern regarding timescales for new settlement and whether the number of units is achievable as forecast due to infrastructure requirements

The changes sought were:

- Revision to the housing strategy to include future opportunities for housing in the intermediate settlements.
- Revision to household projection calculation.

2.2 REPRESENTATIONS - 1ST MODIFICATIONS

The representations made to the Deposit Local Plan were maintained. (RE1.1)

2.3 REPRESENTATIONS – 2ND MODIFICATIONS

The representations made to the Deposit Local Plan were maintained. (RE1.2)

3 WRITTEN SUBMISSIONS EXPANDED APRIL 2009

The CNPA response relies on the content of Topic Paper 1 (CD7.21), Topic Paper 3 (CD7.23) and Topic Paper 4 (CD7.24) in their justification for their land allocation strategy. They also state in their Hearing Statement that “The assessment and general apportionment of numbers is arrived at by reference to population and household projections by University of Manchester (CD7.10) and GROS (CD8.12) and studies carried out by Heriot Watt University and the Three Dragons Consultancy (CD7.9). Specific allocations are made by identification of sites in accordance with the hierarchy of settlements.” (Page 1, CNPA Hearing Statement – General Housing Land Supply).

Topic Paper 3: Housing Land Supply and Affordable Housing (CD7.23)

This paper’s purpose is to set out the approach taken by the Park in identifying land for housing. Of particular note is section 3 which states a specific outcome (part of the Vision) for 2030 is “thriving and sustainable communities **throughout** the Park” and that “people will be able to access housing that meets their needs through rent or purchase.”

Part 4 of that Topic Paper (CD7.23) also sets out some of the Park’s strategic objectives:

- a) Encourage a population level and mix in the Park that meets the current **and future** levels of its communities and businesses.
- b) Make **proactive** provision to focus settlement growth in the main settlements and **plan for growth** to meet community needs **in other** settlements.

- c) Ensure that there is **effective** land and investment for market and affordable housing to meet the economic and social needs **of communities throughout the Park.**

The Topic Paper also summarises the findings of various studies. Of particular note is evidence from CD 7.9 which states “That all areas within the Park were under pressure [for affordable housing] but that **it was greatest in Upper Deeside, Aviemore and Tomintoul**” (para 2.11, page 8)

We don’t believe that the housing allocations are “**proactive**” or “**plan for growth**” in many of the communities **throughout** the Park as required by the Park’s own adopted objectives and strategies. Housing allocations are directed to the new settlement of An Camas Mor and Strategic Settlements at the expense of other settlements designated as ‘intermediate’. The allocations, therefore, do not meet the Park’s strategic objectives as set out above or help the intermediate settlements within the Park to become more viable and sustainable communities.

Housing Figures

In reviewing all of the available information the picture of how the allocations were arrived at is extremely complex. On one hand the allocations are taking reference from 4 disparate Structure Plans but also from housing projections from 2005 (note: projections rather than a forecast i.e. a review of past trends projected into the future). This is not a strategy but acceptance of no real change. We recognise that some flexibility in the housing numbers have been built in we do not believe that housing allocations reflect an obvious and robust ‘strategy’ that has been adopted by the Park and a number of other complex studies. On top of that Tables 2,3 and 4 include a whole range of differing housing figures that are extremely difficult to interpret. Nevertheless, taking a simple approach - if the affordable housing requirement is 121 units per annum up to 2016 (as identified in the CNPA’s own background papers), then over this 7 year period (from 2009) a total of approximately 840 affordable units are required to 2016. At that level a total housing requirement over the 7-year period would have to be 2,100 units if the full 40% of affordable units was achievable on every site. The affordable housing policy, however, has (now flexible) lower limit of 25%. Using that as the achievable affordable housing target would require 3,360 new houses across all tenures.

Table 3 seems to suggest that only 1,850 housing units have been allocated. We recognise that the CNPA have accepted that this total affordable housing figure is not achievable although we suggest that encouraging housing development in the Park to help achieve it and the conservation of the Park's assets are not mutually exclusive. Taking the raw figures a best case scenario that 40% affordable housing is achievable on every site suggests that the 1,850 allocation figure is light by 350 units i.e. it can only help deliver 740 affordable houses. A more realistic scenario based on 25% being achievable across every site (recognised as being more achievable by Heriot Watt and 3 Dragons in their 2008 report – CD7.9, Executive Summary) suggests that the allocations are 1,400 units light i.e. it could only help deliver 740 affordable units at the most. This ignores the proposed revised affordable housing policy that would allow for less than 25% affordable houses on particular sites. We believe that if the affordable housing requirement is to be met then the overall housing allocations need to be increased.

We do not believe that the housing allocations are 'proactive' or plan for growth in many of the communities throughout the Park. The allocations are weighted towards the larger settlements and a new settlement at An Camas Mor. While we do not object to this in principle the level of growth for intermediate settlements is not proportionate and does not encourage a population mix or allocations that will meet the current or future needs of communities or businesses. The allocations therefore do not meet the strategic objectives set out by the Park.

A further point in relation to the above is an issue of clarity surrounding the local plan period. Clarification of the housing figures is required due to the plan's intended life span to 2011. It appears that this Local Plan is intended for the period 2006 – 2011, however, as we are now in 2009. Three years into the five year period the housing figures set out in table 3 seem even less robust and far less likely to meet the overall aims and aspirations of the Park over the intended period.

Many of the housing allocations are existing allocations with existing permissions and some existing allocations are proposed to be removed from this plan. This further complicates matters in relation to the provision of a population mix and planned growth to meet the needs of the communities throughout the Park. Existing permissions may not carry the requirement to meet the anticipated levels of affordable contribution. Therefore, not only are

the housing allocations unlikely to achieve the required affordable provision at 40% the issue is further compounded because of the number of allocations already carrying historic permissions. At the present time market conditions may be delaying construction on some sites with existing permissions. As the market becomes more buoyant there will inevitably be a shortage of housing land under the current allocations. The plan sets out what appears to be an extremely limited growth scenario. The housing figures suggest that the aim is in fact to maintain the status quo and follow projections rather than plan for growth to meet community needs throughout the Park as stated in Topic Paper 3 (CD7.23).

SPP3 also requires that planning “authorities allocate more than enough land, i.e. a generous supply, to help ensure delivery of homes” (CD2.4, para 33). Paragraph 35 sets out how forecasts and projections should help inform housing allocations. It states “The Scottish Government’s national objectives, reflected in targets for greater economic and population growth, imply higher overall household growth than central projections indicate.” This clearly suggests that using centralised data on growth projections i.e. projecting past trends, will not achieve the Government objectives and that higher growth scenarios should be adopted.

A further point for consideration has been brought to light through the Post Inquiry Modifications to Tables 2, 3 and 4 (CD7.28). Table 2 part 2 was a 50% Open Market Housing Allowance which was needed to allow for units built which do not provide housing to meet the housing need such as vacant properties and provision not controlled by the planning system. The proposed Post Inquiry Modifications have a 50% Growth Allowance instead of the Open Market Housing Allowance. The Growth Allowance has been added to increase housing supply and supply of affordable housing. It is important to recognise that this is not the same as an Open Market Housing Allowance as previously proposed and is not additional to the overall figures. This proposed change demonstrates that the CNPA has acknowledged that there is a problem with the housing figures, particularly in relation to provision of affordable housing which appear to be too low to meet the identified need. However, this proposed change does not actually increase any of the housing figures it substitutes the Open Market Housing Allowance for a Growth Allowance creating no additional housing allowance. An Open Market Housing Allowance should be a further additional allowance recognised in Tables 2,3 and 4.

4 STRATEGIC SETTLEMENTS VERSUS INTERMEDIATE SETTLEMENTS

We have reviewed the minor alterations made to the 2nd Modifications (CD6.13) as well as the post Inquiry Modifications (CD7.28) of the Deposit Local Plan and maintain the view that housing land supply is focused at one new settlement (An Camas Mor), at the expense of some of the Intermediate settlements identified in the Plan. The housing allocation proposed for the new settlement is 100 units to 2011. We do not believe that this is a realistic figure given that no permissions have been granted for the new settlement at the time of writing. It is extremely unlikely that 100 units will be completed within the plan period to 2011. This allocation could be better used if some of the housing was spread around the Park to existing settlements such as the intermediate settlements to give balance and a better range of opportunities throughout the Park.

The CNPA has not provided any real justification for identifying settlements as either Strategic or Intermediate. Intermediate settlements offer a range of basic facilities for local communities and the housing allocations proposed for them should reflect this.

5 CONCLUSION

On behalf of Reidhaven Estate we respectfully suggest that the Reporter's recommend that the housing strategy and housing figures for the Park are reviewed and a higher growth strategy is proposed across the administrative area. The important role that intermediate settlements play in creating strong mixed communities needs to be recognised and areas for future growth in the medium and longer term needs to be identified.