

CNP LOCAL PLAN INQUIRY - GENERAL – HOUSING LAND SUPPLY

Objections by P J Swan – Objector Refs 462a, 462b

OBJECTION 462a

My first original objection, to the Deposit Local Plan in 2007, was as follows: “This objection relates to Section 5, Table 2 ‘Housing land requirement calculation’ and Table 3 ‘Phased land supply by local authority’ page 43. The basis of total housing requirement for the Park, as estimated, seems excessive. Specifically, the 50 per cent allowance for second homes and vacant property, plus 15 percent for ‘uncertainty’ on top a base figure that already looks generous, leads to an unnecessarily high commitment for new development, more than 70 per cent above the best available realistic estimate.”

My objection still stands. Moreover, I wish to extend the scope and reinforce the expression of severe concern and opposition to the inclusion of the 50 per cent uplift, because the CNPA, in their latest “officer proposed post-inquiry modifications” appear to be attempting to ameliorate the impact of the overall housing figures in a number of ways. First, the 15 per cent ‘uncertainty’ uplift has been reduced from 15% compound, ie 15% on top of the 50% vacant homes uplift, to 15% only of the base figure of 950, thereby saving 71 (ie 15% of 475) off the bottom line housing number. Second, the CNPA have changed the purpose of the allocation of the 50% uplift (a total of 475 units) from:-

“A 50 per cent allowance for sectors of the open market which cannot be controlled through the planning system and which do not form part of the household projection, and vacant property” , to:-

“A 50 per cent allowance to encourage growth and an increased supply of affordable housing.”

This raises a number of concerns:

1. What, exactly, was in the plan for affordable houses the day before the CNPA created this proposed change?
2. What, exactly, was in the plan for vacant property etc the day after the CNPA created this proposed change?
3. How do the CNP expect the public to react to this overnight change?
4. If the CNPA cannot establish a firm purpose in an allowance amounting to 475 houses, then I respectfully submit that they are incompetent.

My request is that, if the CNPA do not really know what this 50% uplift is for, as appears to be the case, then it should be dispensed with entirely.

I wish to further extend my objection to this “Housing land requirement calculation”, on the grounds that, from paragraphs 49, 74, 76 of the CNPA Topic Paper 3, it is clear that the data on critical factors such as fertility, mortality and migration as used in the Manchester University study are less up to date than data available from GROS. The GROS data lead to a much lower number of new houses required (690) for the same period. The GROS data were not used in the DLP household projections because they were not available until after the Local Plan had been prepared and put on deposit. The CNPA should re-run the predictions and have them independently audited, using the more up to date GROS data, to give a more reliable (and lower) prediction of household numbers, as the current numbers are evidently very significantly over-inflated and the results have a bearing on Ballater H1 allocation.

OBJECTION 462b

My second original objection to the Deposit Local Plan in 2007 was: “This objection relates to Section 5, Table 4, ‘Phased land supply by local authority area’, page 44 (Ballater data specifically). The proposed number of 250 homes for Ballater seems grossly over-estimated; I believe the real foreseeable number of new homes, required to serve the needs of all legitimate ‘stakeholders’ in Ballater is around 30-40 units, of affordable housing. This could be achieved by means of intelligent infill developments and upgrading/conversion of existing properties. Over-estimating Ballater’s future housing requirements as done in the plan will lead to a number of possible problems in the future, including:

- Natural uptake will be lower than planned, leaving many houses empty for lengthy periods and likely targets for vandalism
- Large numbers of new residents in affordable houses will not be required for local employment (because the true size of the future labour market is much lower than 250 new homes would be able to service) and this would lead to social problems associated with increased numbers of long term unemployment.”

I now wish to further expand my objection on the following grounds:

- **Non-Conformity with the Structure Plan**

The assessment of housing needs in the Local Plan for that part of the National Park (“NP”) east of the Cairngorm Massif is far greater than provided in the approved Aberdeen and Aberdeenshire Structure Plan (“N.E.S.T.”). It is also quite likely that the methods used for assessing the housing needs for the National Park as a whole affect the assessment by the Cairngorms National Park Authority (“CNPA”) of the particular housing needs of Ballater. Moreover, the way in which the DLP assumes the need for affordable housing will be met appears to affect the whole Local Plan. The Local Plan proposes numbers of houses far in excess of what is needed and its divergence from the Aberdeenshire Structure Plan is discussed as follows.

The number of houses planned for Ballater by the Local Plan conflicts with the relevant Aberdeen and Aberdeenshire Structure Plan which itself envisages a far fewer number for Ballater. Thus, Table 4 on Page 42 of the Local Plan (as modified) gives the total target for 2006-2016 as 190 units for Ballater (with a total capacity of 250) whereas the Structure Plan Policies 8, 9 and 10 on Page 32 to 34 envisages that, in the part of Marr in the Aberdeenshire Rural Housing Market Area, from January 2000 to December 2016 there will be a total of the order of 240 units for all settlements except for Aboyne, Alford and Huntly. Those settlements include, amongst other places, Torphins, Tarland, Braemar, Lumphanan, Lumsden, Rhynie and Kincardine O’Neil. At 2001 the populations of Torphins and Tarland alone in aggregate exceeded that of Ballater. It was clearly not the intention of the Aberdeenshire Structure Plan that all 240 units should be built in Ballater or, indeed in the part of Aberdeenshire which is now the Cairngorms National Park. The Aberdeenshire Structure Plan states that these units are to be provided by development on a small scale and in support of the economic development or local services. The CNPA have not shown that the Park Plan, which has been approved by Scottish Ministers, justifies the big increase in numbers of houses for the part of the Park east of the massif nor that they have had regard to this conflict with the Aberdeenshire Structure Plan.

The old section 11(5) of the Town and Country Planning (Scotland) Act 1997, in the form in which, by virtue of the transitional provisions, it continues to have effect for the purposes of the Local Plan, requires that in formulating their proposals in a local plan the planning authority shall secure that the local plan conforms generally to the structure plan as it stands for the time being whether or not it has been approved by the Scottish Ministers; but where the Scottish Ministers have approved a structure plan, the applicable section 17(3) states that the planning authority shall not adopt any plan or proposals which do not conform to the structure plan. The Aberdeen and Aberdeenshire Structure Plan (NEST) was approved by the Scottish Ministers on 21st December 2001. There has been no subsequent structure plan embracing the National Park although the Cairngorms National Park Plan 2007 is said

by paragraph 2.9 of the Local Plan (as modified) to have been approved by the Scottish Ministers on the 15th March 2007. Under section 14 of the National Parks (Scotland) Act 2000 public bodies or office holders must in exercising functions so far as affecting a national park, have regard to the National Park Plan, but there is nothing in the National Park Plan which alters the numbers of houses, which the Aberdeen and Aberdeenshire Structure Plan proposes for the part of Aberdeenshire now in the National Park.

Realistic Assessment of Total Housing Needs

As indicated on Page 6 of their report of December 2005 that Manchester University's forecasts of population for 2001 to 2025 assume recent migration both ways will continue. In other words, if more houses are built, more people predominantly in the 40 to 60 age group will move into the area. The forecasts show a decrease of the younger population. Page 7 of the University's report forecasts that in 2025 nearly half the population of the Park will be aged over 65 compared with a quarter in 2001 and says that the impetus for the change is migration. It may be therefore that there needs to be less market housing and more affordable housing as market housing increases inward migration of the 40 to 60 age group. The planned number of houses should also have regard to provision planned for outside Ballater and in Marr but outside the National Park e.g. Aboyne and also the number of young people who would leave Ballater anyway.