

OBJECTION 390u General – Housing Roy Turnbull

1. The CNPA has failed to abide by the National Parks (Scotland) Act 2000 and the Planning etc. (Scotland) Act 2006.

The response to objection 390u by the CNPA (CNPA Paper 899), along with the DLP and Topic paper 3 (CNPA 837), makes clear that the initial calculation of the total housing land supply in the Local Plan was determined without reference to:

- i) The first and second aims of the National Park, as set out in the National Parks (Scotland) Act 2000, namely,
 - a) To conserve and enhance the natural and cultural heritage of the area, and
 - b) To promote sustainable use of natural resources of the area.

- ii) The Planning etc. (Scotland) Act 2006 Section 3E, which states, “The planning authority must exercise the function with the objective of contributing to sustainable development.”

That this is the case is attested by:

DLP Section 5.33, which states, inter alia, “Population and household projections for the National Park have been prepared These are based on past trends in society, and assumptions about likely future conditions ...”

DLP Section 5.36, which states, inter alia, “There is no exact measure of how many dwellings will be required in the future The National Park Authority must make an estimate When making this estimate it must consider the likely growth in households,”

Neither of the above statements makes any reference to any need to modify the housing land supply as a result of consideration i) or ii) above, nor is there any evidence that any such modification has occurred.

This is also the case for The University of Manchester (2005) Report, (CD7.10), the Cairngorms Housing System Analysis - Heriot Watt University 2006 (CD7.8) and the Planning for Affordable Housing in the Cairngorms National Park – Heriot Watt University and Three Dragons Consultancy 2008 (CD7.9), which are discussed in the CNPA Paper 837, Topic Paper 3. In none of these documents is there any evidence that the number of houses proposed has been reduced by reference to the first and second aims of the National Park or the Planning etc. (Scotland) Act 2006 Section 3E.

Thus, the housing land requirement calculation for the National Park (DLP Table 2) is arrived at without any assessment of:

- firstly, whether the allocations proposed are possible without unacceptable levels of damage to the natural and cultural heritage of the National Park
- secondly, (and of crucial importance to the long-term future of the National Park), whether the rate of growth of housing proposed can be accommodated into the future without such unacceptable damage, and
- thirdly, whether the scale and rate of growth proposed is consistent with sustainable development.

The CNPA Paper 837, Topic Paper 3 claims, (para. 19) “The approach to housing land supply taken by the CNPA ... strikes an appropriate balance between conserving and enhancing the natural and cultural heritage of the area and addressing the social and economic needs of local communities.” But there is no evidence of any change in the housing land supply outlined in the DLP Table 2 p.41 as a result of considerations to conserve and enhance the natural and cultural heritage of the area. The claim concerning “balance” is empty rhetoric and is not true. A balance results from taking an intermediate position between two extremes. When only one of those two extremes is identified, as is the case here, a balanced position is neither being sought, nor is it possible.

The response by the CNPA in Paper 899 General Housing Section 7.8 to this objection 390u simply pointed out that the rationale adopted by the CNPA was made clear in the DLP and in Topic Papers 1 & 3. Indeed, that is correct: the rationale is clear, and it is as I have outlined above. The CNPA has clearly not assessed the housing land requirement with reference to i) or ii) above and did not address the substance of objection 390u at all.

This lack of assessment is considered contrary to the first and second aims of the National Park, and thus to the National Parks (Scotland) Act 2000, and is also considered contrary to the Planning etc. (Scotland) Act 2006 Section 3E.

2. The CNPA Assessments of Housing Need

CNPA Paper 837, Topic Paper 3 outlines the approach taken by the CNPA in assessing housing land supply.

The “2001 Census Profile - Badenoch & Strathspey” reported a population of 11,763 persons and 6320 total household places, giving an average of 1.86 persons per household. The figures for the National Park as a whole at the 2001 census are 16,295 persons and 9441 total household places, giving an average of 1.73 persons per household. (See CD7.8 Heriot Watt University 2006, Table 7 p.21 and para.4.1 p.30)

The average household size for Scotland is provided by the “Statistical Bulletin HSG/2002/4 - Household Projections for Scotland: 2000-Based”, which states, “the average household size is projected to fall from 2.3 persons in 2000 to 2.0 persons in 2014”.

However, the apparent lower average household size in Badenoch and Strathspey, compared with Scotland as a whole, reflects the greater preponderance of second/holiday/vacant homes in the district compared with the national average. The “2001 Census Profile - Badenoch & Strathspey” reports this figure as 20%, so that there are just 5057 households in Badenoch and Strathspey, giving an average household size of 2.33 persons per household when second/holiday/vacant homes are discounted.

Similarly, CD7.8 Heriot Watt University 2006, para.4.1 p.30 reports 77% (7270) of households in the National Park are occupied, giving an occupancy rate of 2.24 persons per household.

Thus, both in Badenoch and Strathspey and in the National Park as a whole, the household size is close to the average Scotland figure for 2000, i.e., about 2.3 persons per household.

The CNPA “Housing land requirement calculation” is given in Table 2 p.41 of the DLP. This is itself based on the University of Manchester 2005 projection of an increase of 938 households and

of 600 in population between 2006 and 2016 (para.74 Topic Paper 3). The CNPA rounds up the 938 households to 950. It is acknowledged (Topic Paper 3 para. 32) that there is no natural increase in population and the 600 increase would be a result of in-migration.

At an average occupancy rate of just 2 persons per household – lower than the current average for the National Park – that increase in projected population of 600 people would require just 300 houses. That would leave 650 houses available to cater for an increased housing supply for the present population of the National Park.

The CNPA then suggest a 50% increase (Topic Paper 3 para. 78) to allow for vacant/second/holiday accommodation and a further 15% flexibility allowance. No justification whatsoever (other than that already stated) is provided for this addition to the housing supply to 1639, (later reduced to 1568, with reference but no explanation to PAN 38 para.17).

A final figure of 1875 houses is arrived at, some 1500 houses more than that required to accommodate the increase in population.

Throughout all of these calculations there is no reference to the first and second aims of the National Park or the requirement for sustainable development in the Planning etc. (Scotland) Act 2006, Section 3E, all of which require consideration to be given of the effect of current policies on events for decades into the future.

Nor is there any discussion, in view of those constraints, and the further constraints developing concerning the urgent need to curtail greenhouse gas emissions, (recognised in the Climate Change Bill at present progressing through parliament), whether there is any justification for continued construction of any second homes in the National Park.

The result is the allocation of a level and rate of house building that will produce unacceptable damage to the natural and cultural heritage of the National Park for the duration of the Local Plan and make more difficult subsequent reductions in the rate of house building

Consequently, it is recommended to the Reporter that the allocation of housing in excess of the figure of 950 given in Table 2, p.41 of the DLP, be removed from the Local Plan.

List of Documents

- CD1.3 The National Parks (Scotland) Act 2000
- The Planning etc. (Scotland) Act 2006 see http://www.opsi.gov.uk/legislation/scotland/acts2006/pdf/asp_20060017_en.pdf
- CD 7.10 CNP Population and Households projection, Univ. of Manchester, 2005
- CD 7.8 Cairngorms Housing System Analysis – Heriot Watt University 2006
- CD 7.9 Planning for Affordable Housing in the Cairngorms National Park – Heriot Watt University and Three Dragons Consultancy 2008
- CD.7.23 CNPA Paper 837, Topic Paper 3, “Approach to Housing Land Supply and Affordable Housing”
- CNPA Paper 899 General Housing
- CD 7.21 CNPA Paper Topic Paper 1 “Statutory National park Context”
- 2001 Census Profile - Badenoch & Strathspey
- Statistical Bulletin HSG/2002/4 - Household Projections for Scotland: 2000-Based see: <http://www.scotland.gov.uk/Publications/2002/08/15336/10571>