## Badenoch & Strathspey Conservation Group

# STATEMENT OF EVIDENCE Hearing Session

Provision of the Local Plan

5.38 Housing Issues in NP

### Summary of objection(s)

Higher figure of 950 being used (adds 200 units).

Further allowance being made to take account of vacant properties and provision not controlled by planning system (adds 475 units).

Additional 15% to allow for uncertainty (adds 214 units).

These add 889 units without any regard for carrying capacity, sustainability, and predictable adverse impacts on natural and cultural heritage (e.g. on biodiversity, special habitats, amenity, landscape, etc). The CNPA should not be adding this large number of houses, given the amount of land required, that the resource of land is finite, and that the CNPA has special responsibility for safeguarding the national natural (and cultural) heritage and special qualities.

We do not accept that the 475 units for second homes are justified, given the economic and social benefits derived from countryside in communities that is undeveloped.

We further query the wisdom of adding 889 extra units at a time of economic downturn.

#### Recommendation.

Use lower figure of 750.

Omit 50% open market housing allowance.

Omit 15% uncertainty allowance.

Revise Tables accordingly.

#### Additional statement

According to the figures given in University of Manchester report of Dec 2005 (para 31 Topic Paper Approach to Housing Land Supply and Affordable Housing), the CNP population is projected to rise on average by some 56 people pa. Over a 5 year period this gives a population increase of some 280 people. The projected rise is 9%.

According to the figures given by the GROS 2008 report, the CNP population is projected to rise on average by some 124 people pa. Over a 5 year period this gives a population increase of some 620 people. The projected rise is 20%.

The GROS population figures are over double the University of Manchester figures. This is in spite of the 2 reports having been produced only a few years apart, having presumably used data sets gathered not more than a few years apart, and analysed their data using the same software.

Para 76 states that "Given that projections are not an exact science". This substantial discrepancy between the two sets of figures demonstrates this lack of exactness.

The CNPA is using projections extending to 2031 (e.g. paras 48, 50), with little interpretation as to how these projections translate into actual figures applicable to the lifetime of the present DLP. Further, given the degree of inexactness of figures using relatively up to date information, it is questionable how much weight can reasonably be given to projections that extend to the time period of what will be the 5<sup>th</sup> CNPA 5-year LP.

The highest population figure is 620 and the lowest number of houses is 750, giving an excess of houses over population of 130.

The GROS report projects the number of households increasing by 20% up to 2026.

According to the 2001 census figures for Badenoch & Strathspey, there were then 6320 household places (i.e. all houses, occupied and unoccupied), and 5057 occupied households. The census population was 11, 763. These figures give an average of 2.32 people per occupied house. The Scottish average in 2000 was 2.3 people/household.

The figure of 2.32 could be rounded down to 2.0 people per household, to allow for some increase in the number of smaller households.

The CNPA do not make it clear how census figures have been used in their projections. Census figures are actual figures pertaining to 2001. The projected figures are estimates with a demonstrated major level of inexactness.

One of our fundamental objections to the allocations in the present LP is that they conflict with the aims of the Park. The scale of housing proposed affects the degree of conflict.

The settlement boundaries in the present LP are drawn with little scope for future expansion. This raises the question, how does the CNPA envisage being able to continue with housing growth at a comparable level, and at the same time comply with the aims of the Park? Or does the CNPA envisage housing boom during the life of the present DLP, followed by housing bust in the next or subsequent LPs?

There are apparently 422 people on the housing waiting list whose 1<sup>st</sup> preference is for a house in Kingussie (Strathy report 1.4.09). At an average of 2 people/house, and 25% affordable housing, this would require 844 homes. At present 300 houses are proposed, causing major concern in the town (public meeting attended by 200 people, 24.3.09) and set to increase the number of houses in Kingussie by about a third (850 houses at 2001 census; additional 73 houses built since then, according to HC, reported in Strathy 1.4.09. This gives a total of 923 houses).

Therefore, at present population levels, the current allocation is nowhere near meeting the 'need' as indicated by the waiting list. The increase in population associated with this allocation would fuel further need for affordable housing, for example, as each new generation of first time buyers grows up and enters the housing market. There is also a question of older relatives needing social housing to move near to their families.

The SEA para 7.2 p 35 states "The approach outlined in the DLP has been chosen because of its potential to tackle problems in the housing market". Yet the example of Kingussie appears at variance with this claim. We do not consider that Kingussie is exceptional.

As another example, the north Aviemore new development (Lochan Mhor) has been widely described as one of the biggest affordable housing developments in the Highlands. It has 50% affordable houses, a particularly high percentage. Yet Aviemore is still described as one of the most stressed areas for housing.

The SEA para 7.2 p 35 observes, "The most significant development proposals in terms of land area and potential environmental effects within the DLP are those for housing land".

In light of the above, we consider that even the lower figure of 750 is excessive.