
**CAIRNGORM NATIONAL PARK
PUBLIC LOCAL PLAN INQUIRY 2009
Expanded Written Submission**

OBJECTION REFERENCE: 394i

**HOUSING LAND SUPPLY
[GENERAL] AND HOUSING
ALLOCATION TABLES**

APRIL 2009

On behalf of The Mar Estate



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1 INTRODUCTION

This is an expanded written submission prepared by Halliday Fraser Munro on behalf of The Mar Estate. It relates to housing land supply and specifically tables 2, 3 or 4 and follows on from discussions with CNPA Planning Officers in February 2009.

2 SUBMITTED REPRESENTATIONS

Halliday Fraser Munro have submitted objections to the First Modifications and Second Modifications of the CNPA Local Plan on behalf of "The Mar Estate" (not "Proprietors of the Mar Centre" as it has been referenced). These expanded upon or confirmed the initial objections made by Savills (Document MAR1.2) on the Deposit Local Plan on behalf of the Mar Estate or made new points in relation to the Modified sections of the Plan. For the avoidance of doubt Halliday Fraser Munro have taken over the lead planning advisor role in respect of the Local Plan Inquiry for The Mar Estate. We continue to work together with Savills in this respect and have adopted their initial representations set out in Document MAR 1.2.

Our previous submitted representations indicated:

These tables have been altered with Aberdeenshire part of the Park and Braemar in particular losing housing sites over the period to 2016. Braemar can and should accommodate more housing than is proposed in order to support its future role in the Park.

Changes Required to Resolve the Objection

Increase the housing allocation in Braemar in line with the sites identified in this report.

We also included a plan indicating where we felt development may be appropriate in Document MAR 1.4. This has subsequently been updated and formalised as Document MAR 1.5.

Further, and not included in the CNPA Hearing Statement of April 2009, are the representation made by Savills on behalf of The Mar Estate to the Deposit Local Plan (these are not referenced). As indicated at the beginning of this expanded Written Statement Halliday Fraser Munro have taken over the role of the lead planning consultant but are working with Savills in taking the Estate's concerns forward. In their original representation (MAR1.2) Savills indicated:

"The Estate has considered the scope for both short term and medium to long term development and we would welcome the opportunity to discuss our thoughts. Of particular interest is the scope for a 20-30 house development on land which currently lies outwith the village envelope but within the Conservation Area.

*We regularly receive requests from local families wanting to build or buy a house of their own to enable them to live and work in the area. It is impossible to satisfy demand and because of this we have considered where best the Estate could provide a site for a substantial development on which a high proportion (i.e. in excess of CNPA minimum standards) of Affordable Housing together with recreational facilities could be located ... **we ask that the Deposit Local Plan is amended accordingly.** We believe there is scope for further development outwith the village envelope which would enhance Braemar. The village envelope boundary should remain flexible."*

In particular the letter from Savills requested discussion with the CNPA on the aspects that their letter raised. It also indicated that Savills (as the Estate's management consultant) receive regular requests for houses or land from local families. Further evidence on housing demand and need is discussed later but Additional Document MAR 1.9 sets this out in some more detail.

The CNPA Response, set out in their Hearing Statement of April 2009 is that they consider " *Topic Paper 1 "Statutory National Park Context" (CD 7.21), Topic Paper 3 "Approach to Housing Land Supply and Affordable Housing" (CD 7.23), and Topic Paper 4 "Site Selection" (CD 7.24) set out the context for the Local Plan within a National Park and the approach to the allocation of land, including issues surrounding the collection of data. The allocations are a response to housing needs within the Park for all sectors of the community; they reflect the centres/levels of population and demand taking account of geography and settlement pattern. There are unimplemented planning permissions for Housing in Braemar on H1 and H2. Planning permission also exists for another 12 units at Invercauld Farm. The Local plan has allocated sufficient and adequate supply of housing land in Braemar. The CNPA will monitor the implementation of the Local Plan as a whole, and with regard to housing we will monitor the effectiveness of the policies in delivering to meet the needs of communities and also the impact of developments in terms of other policies. The future Local Development Plan will be informed by the outcome of monitoring.*" (8.10). The CNPA are suggesting some changes to tables 2-4 to clarify the housing land requirement and phasing.

3 EXPANDED WRITTEN SUBMISSIONS

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 the Hearing Statement that *“The assessment and general apportionment of numbers is arrived at by reference to population and household projections by University of Manchester and GROS and studies carried out by Heriot Watt University and the Three Dragons consultancy. 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 (CD7.20)

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 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.
- d) 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 the 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 Tomintou**”* (paragraph 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. The allocations effectively produce an east-west split with settlements such as Aviemore receiving a greater allocation and many of the eastern settlements being effectively left as

they are. The allocations, therefore, do not meet the Park's strategic objectives as set out above or help the villages and towns in the east of the Park to become more viable and sustainable communities.

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. Rather it is an acceptance of no real change and although 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. Nonetheless, 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 (excepting any backlog since 2006). 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 to 2016. We recognise that the CNPA have accepted that the total required 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 **462 affordable units at the most**. This ignores the proposed revised affordable housing policy, which 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. This is

especially the case to the east of the Park where only a very limited allocation of new housing has been identified.

SPP3 also requires that planning "*authorities allocate more than enough land, i.e. a generous supply, to help ensure delivery of homes*" (CD 2.4, paragraph 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.

Paragraph 43 of SPP3 also requires that "*Development plans should be capable of responding to changes as necessary. They should identify triggers for future phases of effective sites, such as where the annual audit of housing land ... indicates that availability of housing land and/or completions is not keeping pace with identified requirements*". We have lodged an example of where this has approach has been adopted on Document MAR 1.7 and suggest that this general approach is adopted by the CNPA. In order for that to have effect it will be important to identify future development sites that can come forward in the circumstances where the triggers are activated.

We would also suggest very strongly that the CNPA carry out their own Housing Land Audit in line with national requirements.

4 BRAEMAR HOUSING LAND ALLOCATIONS

Our objection related specifically to the allocations in Braemar as this is where our Client's landholding and interests are. As indicated above we believe that the housing land allocations are generally too low and will not help deliver the required affordable housing so often emphasised in the CNPA background papers as being of key concern.

In Braemar the housing allocations are for sites that have an existing consent. The CNPA, in their housing allocations, have already identified a key problem with these types of sites i.e. that they were given consent prior to the Park's affordable housing policies being in place. In theory, therefore, Braemar is at a disadvantage as it will not be able to achieve a rate of affordable housing that other settlements can by virtue of their non-consented housing allocations having to meet a more stringent standard. Braemar has a high level of local need. We have illustrated this in the information provided by Savills (see MAR 1.2 and Additional Document 1.9) but also in the additional Document MAR 1.8 "Braemar Housing Needs Analysis" carried out in May 2007 by the Rural Housing Service on behalf of the CNPA, Aberdeenshire Council and the Braemar Community Council. It reflects the worrying trends in significant out-migration of the younger population and significant in-migration of an older population (CD 7.10 – Population and Household Projections, University of Manchester). Page 3 of that projection indicated almost 34% reduction in the age range 0-15, 10.5% in age range 16-24 and 31% reduction in age range 25-39 between the years 2001 to 2025. In other words the families with children are moving out. Significantly the in-migration showed a 100%+ increase in the over 75s across the same period. This, in our view, is simply starting to store up problems and needs to be addressed by ensuring that new and affordable family housing is allocated and delivered now.

MAR 1.8 , however, presents a more up-to-date picture of the housing requirements in Braemar in particular. Section 4.0 provides some evidence of the house price versus earnings in the area and we suspect that this gap has widened since then. Section 5.1 also suggests that there is more hidden housing need in Braemar (ignoring those wanting to move there from elsewhere) than has been acknowledged in the housing allocations. Further evidence provided by the Rural Housing Service (Additional Document MAR 1.10, provide by The Rural Housing Service) shows that the relets for family housing are sitting at zero for the past 7 years with relets for other housing types also extremely limited. Of the 15 officially on the Council Housing Waiting list (as we have indicated there is a hidden housing need with families

seemingly not adding their names to the waiting lists because there is simply no movement in the existing stock or new supply of family housing), 8 are from the local area and 7 from outwith that area. Braemar remains popular as a place to live.

5 STRATEGIC SETTLEMENTS VERSUS INTERMEDIATE SETTLEMENTS

Justification for identifying settlements as either Strategic or Intermediate has to date been limited. We believe that Braemar is the heart of the Park. It sits squarely in the centre of the Park and could, if allowed, flourish to become more than a small village serving the tourist industry. With the right critical mass of resident population it could support new jobs, new businesses and retain or attract better services to serve the local population. A mix of age ranges, families and housing types could help achieve this. The Mar Estate, as a key landowner in and around Braemar is committed to making that happen and would like to work with the Park to determine how this can be achieved. **A separate Hearing has been arranged for Braemar as a settlement but we believe that more land should be allocated for new housing around Braemar to allow it flourish as a place to live rather than a place to visit.** Where and how will be discussed at that Hearing.

6 ADDITIONAL DOCUMENTS

MAR 1.8 – *Braemar Housing Needs Analysis, May 2007 – The Rural Housing Service*

MAR 1.9 – *Email from Savills (Mar Estate's management consultants)*

MAR 1.10 – *Relet and waiting list information March 2009 – Sourced from The Rural Housing Service*

APPENDIX 1 – Additional Documents

Additional Document MAR 1.8 - "Braemar Housing Needs Analysis May 2007"

Additional Document MAR 1.9 – e-mail from Savills (L&P) Limited, 27.04.09

**Additional Document MAR 1.10 – Relet and Housing Waiting List
Information for Braemar (Source: The Rural Housing Service, March 2009)**