

<b>Date:</b>			
<b>Issue:</b>	<b>General – Housing Land Supply</b>		
<b>Objector(s):</b>	Mrs Jane Angus	<b>Objection ref(s):</b>	437k, 437o
	Reidhaven Estate		456c
	James and Evelyn Sunley		056m, 056i
	Phillip John Swan		462b, 462a
	The Proprietors of Mar Centre		394i
	Muir Homes Ltd.		038l
	Mr. & Mrs. Houston		096b
	Ballater & Crathie Community Council		091a,b,g,h,j,k,l,m,n

<b>Reporter</b>	Mrs. Jill Moody and Mr Hugh Begg
<b>Procedure</b>	Hearing

## 1.0 Overview

- 1.1 This statement sets out the Cairngorms National Park Authority response to the objections raised to the Deposit Local Plan as modified in respect of general content on housing land supply and supplements the response made to those objections by the Cairngorms National Park Authority in its report to Committee (CD7.3-7.5). CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land supply. It is also recommended that the reference to 75% 2 and 3 bedroom units in para 5.58 is removed. These suggested changes have not been endorsed by the CNPA Board. (CD7.28)

## 2.0 Provision of the Local Plan:

- 2.1 Section 2 of the Local Plan sets out the overall national, regional and structure plan context, explains the relationship with the adopted National Park Plan and sets out the Vision for the Local Plan. Section 3 expands on the role of a Local Plan in a National Park context with Policy 1 providing a clear link with the 4 aims of the Park. Sections 5 and 7 explain the approach to sustainable communities, with Section 5 setting out the context and policies for housing provision and Section 7 the hierarchy and proposals for individual settlements. The approach to housing takes its lead from the strategic objectives in the National Park Plan and seeks to ensure sufficient effective land for market and affordable housing to meet the social and economic needs of communities throughout the Park. 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 Three Dragons consultancy. Specific allocations are made by identification of sites in accordance with the hierarchy of settlements.

## 3.0 Summary of objection(s)

- 3.1 19 objections raising some 11 issues have been lodged on the general issue of housing land supply and wish to have their objections considered in a hearing:
- Consider social, economic, educational and medical aspects of rapid growth. Not appropriate to develop large numbers of houses for people to commute or retire. Refer to Rural Needs Survey and give consideration to home working including new specialist employment opportunities. (437k)

- Object to overall housing strategy and figures in Tables 2-4. Estimate based on set of assumptions that are not clear, based on low growth scenario and does not account for 132 units of affordable. Capacity in intermediate settlements in medium to long term shows little growth. Important that future development opportunities are identified. Do not object to An Camas Mor, but consider development should also be directed to existing settlements. **(456c)**
- Guilty of forming policy for Park as a whole when affordable housing needs and housing development potential are quite different in Ballater. Number of affordable houses required in Ballater for local people and for employment needs has not been established. In response to 2<sup>nd</sup> mDLP wants changes from Aberdeenshire Local Plan delineated. **(056m)**
- Objects to Table 4, 250 homes for Ballater gross over-estimate, need is 30-40 units of affordable housing which could come from intelligent infill and upgrading/conversion of existing properties, overprovision will lead to empty houses, large numbers in affordable housing unable to find employment, number should be lowered to around 50 units. **(462b)**
- In response to 1<sup>st</sup> modification, tables have been altered with Aberdeenshire part of Park and Braemar in particular losing housing sites to period to 2016. Increase housing allocation in Braemar. **(394i)**
- Table 2, the basis for the total housing requirement seems excessive. 50% allowance for 2<sup>nd</sup> homes plus 15% for uncertainty on top of generous base figure leads to new development more than 70% above best available reasonable estimate. Revert to household projection of 950 units as a realistic total requirement. In response to 2<sup>nd</sup> modifications refer to p40 para 5.28 and object to identity of two important sources of information at this late stage and not enough time for concerned parties in the community to examine them. **(462a)**
- In response to 1<sup>st</sup> mDLP, Table 4 should clarify that some sites are identified in current adopted Badenoch and Strathspey Local Plan, including HI Grantown on Spey. Terms of Policy 21 better than in DLP, but failure of the local plan to provide “support for allocated sites. Without private development the 121 affordable houses required annually will not be provided. **(038I)**
- Mixed housing development and sustainable balance of affordable and open markets is more likely to be successful when there is housing for local people, does not seem possible to produce balance in the plan without bringing in a dangerously disrupting change in population. Need to identify land for housing in Ballater over longer period than 5 years. **(437o)**
- Paras 5.1 – 5.3 of DLP, Ballater would not exist if it had not been its attraction to wealthy and important as a retirement place and health spa, this has been the case for 150 years, different from Aviemore’s history, the localm plan appears to want to stifle the opportunity for people to buy homes in Ballater. Without the constant influx of grey money, Ballater will die. The policy for Ballater has to have high value housing development of the type that will attract people to retire to Ballater and subsidise affordable housing. **(056i)**
- No problem with selected NPP outcomes 2012 and action programme other than those for making housing more affordable and sustainable. No statistical evidence that a “need” exists for new house building in Ballater other than to satisfy 2<sup>nd</sup> home owners and pressure from builders federations and lobbyists, not to mention cash strapped landowners. Further object to so called specialists who know nothing about how local communities function who allocate any vacant area for housing. Properties not bought as 2<sup>nd</sup> homes will presumably be bought by local young people. Where are new jobs coming from – only forestry, agriculture, tourism locally? This is ill conceived policy requiring a rethink, identify the real need. In response to 1<sup>st</sup> mDLP main objection is that it is a theoretical model of housing need without recognition of what happening in Ballater. Restates points made previously regarding where is local housing need and where are jobs coming from? In response to 2<sup>nd</sup> mDLP objects to methodology of implementation of consultation process and request further consultation on 2nd modifications. Refers to late addition in 5.28 p40 of 2 important sources of information with little time for them to be examined. Makes specific references to Ballater HI allocation and states that development solely for affordable housing would be acceptable on infill and brownfield sites if accompanied by

removal of the allocation. Raises specific objections to Policy 21. Objects to reference in CD7.9 Communities Scotland report to 75% 2/3 bed units benchmark when need is for smaller units in Ballater. Objects to Policy 30 Provision for Gypsies/Travellers. **(096)**

- The Community Council fully supports the future development outline for Ballater as proposed by the Princes Foundation. The plan focuses too heavily on housing provision and not enough on employment and infrastructure needed for housing development. Employment creates the need for housing. Affordable housing needs are directly linked to requirements of full time employment. Settlement boundary should include the Craighendarroch complex and the wooded area around the school. Omissions including battlefield site and souterrain. Crathie should be a settlement. History of Ballater different from other places in the Park established as a “spa”. View of some of Community Council, without present day incomers Ballater will die, they help boost village economy. Some members of the CC believe land must be available for high value housing for such persons which will help subsidise affordable housing. The CC believes that housing requirements in NEST do not reflect the needs of The Park. Many residents consider 250 units proposed for Ballater alone is overdevelopment and is unacceptable. The Plan does not take account of the 60 or more built since 2002. The Plan has formed policy for Park as a whole when needs of Ballater are quite different from other settlements. Number of affordable houses in Ballater for local people and for commercial employment needs has not been established. The CC does not see how Ballater can sustain 30% affordable housing. Not all agreed on mixed developments. Should recognise needs of Ballater for low cost housing for young and old as well as high value to help pay for low cost. Maintain character of village that delights tourists and residents alike. Most of this will be fulfilled if plans of Princes Foundation are put into action. Use of local authority and housing association waiting lists does not help meet local needs. Need provision for hotel and hostel accommodation, a designated parking area for the Games and more recreational facilities. Unable to support Ballater HI. Objections maintained to 1<sup>st</sup> mDLP and to 2<sup>nd</sup> mDLP. **(091a,b,g,h,j,k,l,m,n)**

#### **4.0 Summary of Cairngorms National Park Authority Response**

- 4.1 Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. 2<sup>nd</sup> homes are not controlled by the planning system. The Local Plan allocated sufficient and adequate supply of housing land. The allocation in Ballater reflects the future provision identified in the adopted Aberdeenshire Local Plan and makes reference to the work by the Princes Foundation. The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including opportunities for employment. Employment land has been included in settlements to compliment housing. The policies in the plan have to be read together. The aims of the Park remain paramount in all decision making and proposals have to comply with all relevant policies in the Local Plan, including Policy 1 that has been clarified in modifications and underpins the Plan with regard to the 4 aims. Various points are made in respect of affordable housing and these are picked up in evidence in response to objections to the general approach to that issue and to Policy 21. However, the modelling approach by 3 Dragons is intended to maximise the affordable housing contribution within the Park. 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.

## **5.0 CNPA Commendation to Reporter**

5.1 It is commended to the Reporter that the objections to the general approach to housing land supply as listed above are rejected. No issues are raised that could lead the Cairngorms National Park Authority to consider the approach deficient. CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land supply. It is also recommended that the reference to 75% 2 and 3 bedroom units in para 5.58 is removed. These suggested changes have not been endorsed by the CNPA Board. (CD7.28)

## **6.0 Strategic issues**

6.1 Sections 2, 5 and 7 of the Local Plan along with Topic Paper 1 “Statutory National Park Context” (CD7.21) and Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) between them clearly set out the strategic context in terms of National Parks legislation, National Park Plan, Structure Plans, and Scottish Planning Policy. The objections raise no issues regarding conformity between the Local Plan and this context.

## **7.0 Other material considerations**

7.1 Topic Paper 4 “Site Selection” (CD7.24)

## **8.0 Assessment / Scope of Evidence**

8.1 **(437k)** Objection: objects as should consider social, economic, educational and medical aspects of rapid growth. Not appropriate to develop large numbers of houses for people to commute or retire. Refer to Rural Needs Survey and give consideration to home working including new specialist employment opportunities.

8.2 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including opportunities for employment. Employment land has been included in settlements to compliment housing. The policies in the plan have to be read together. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.

8.3 **(456c)** Objection: object to overall housing strategy and figures in Tables 2-4. Estimate based on set of assumptions that are not clear, based on low growth scenario and does not account for 132 units of affordable. Capacity in intermediate settlements in medium to long term shows little growth. Important that future development opportunities are identified. Do not object to An Camas Mor, but consider development should also be directed to existing settlements.

- 8.4 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.
- 8.5 **(056m)** Objection: object, guilty of forming policy for Park as a whole when affordable housing needs and housing development potential are quite different in Ballater. Number of affordable houses required in Ballater for local people and for employment needs has not been established. In response to 2<sup>nd</sup> mDLP wants changes from Aberdeenshire Local Plan delineated.
- 8.6 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. The allocation in Ballater reflects the future provision identified in the adopted Aberdeenshire Local Plan and makes reference to the work by the Princes Foundation. Points are made in respect of affordable housing and these are picked up in evidence in response to objections to the general approach to that issue and to Policy 21. However, the modelling approach by 3 Dragons is intended to maximise the affordable housing contribution within the Park. 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.
- 8.7 **(462b)**Objection: Objects to Table 4, 250 homes for Ballater gross over-estimate, need is 30-40 units of affordable housing which could come from intelligent infill and upgrading/conversion of existing properties, overprovision will lead to empty houses, large numbers in affordable housing unable to find employment, number should be lowered to around 50 units.
- 8.8 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. The allocation in Ballater reflects the future provision identified in the adopted Aberdeenshire Local Plan and makes reference to the work by the Princes Foundation. Points are made in respect of affordable housing and these are picked up in evidence in response to objections to the general

approach to that issue and to Policy 21. The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including opportunities for employment. Employment land has been included in settlements to compliment housing. 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.

- 8.9 **(394i)** Objection: Objects, in response to 1<sup>st</sup> modification, tables have been altered with Aberdeenshire part of Park and Braemar in particular losing housing sites to period to 2016. Increase housing allocation in Braemar.
- 8.10 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.
- 8.11 **(462a)** Objection: Objects to Table 2, the basis for the total housing requirement seems excessive. 50% allowance for 2<sup>nd</sup> homes plus 15% for uncertainty on top of generous base figure leads to new development more than 70% above best available reasonable estimate. Revert to household projection of 950 units as a realistic total requirement. In response to 2<sup>nd</sup> modifications refer to p40 para 5.28 and object to identity of two important sources of information at this late stage and not enough time for concerned parties in the community to examine them.
- 8.12 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan has allocated sufficient and adequate supply of housing land. The reference to the two reports in the 2<sup>nd</sup> modifications (CD7.8 and 7.9) was intended to provide further context for the policies within the Plan. CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land supply. It is also recommended that the reference to 75% 2 and 3 bedroom units in para 5.58 is removed. These suggested changes have not been endorsed by the CNPA Board. 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. The commendation to the Reporters highlights the changes referred to above that are proposed to clarify housing land requirement and supply.

- 8.13 **(038I)**In response to 1<sup>st</sup> mDLP, Table 4 should clarify that some sites are identified in current adopted Badenoch and Strathspey Local Plan, including HI Grantown on Spey. Terms of Policy 21 better than in DLP, but failure of the local plan to provide “support for allocated sites. Without private development the 121 affordable houses required annually will not be provided.
- 8.14 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan has allocated sufficient and adequate supply of housing land. The allocation of sites in the existing local plan does not mean that they are automatically included in this one. It is therefore not relevant to highlight that it has been previously allocated. These suggested changes have not been endorsed by the CNPA Board. 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.
- 8.15 **(437o)** Objection: Objects, mixed housing development and sustainable balance of affordable and open markets is more likely to be successful when there is housing for local people, does not seem possible to produce balance in the plan without bringing in a dangerously disrupting change in population. Need to identify land for housing in Ballater over longer period than 5 years.
- 8.16 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan has allocated sufficient and adequate supply of housing land. CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land. The revision to Table 4 clearly shows the medium term indicative capacity in Ballater. These suggested changes have not been endorsed by the CNPA Board. 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. The commendation to the Reporters highlights the changes referred to above that are proposed to clarify housing land requirement and supply.

- 8.17 **(056i)** Objection: Objects to paras 5.1 – 5.3 of DLP, Ballater would not exist if it had not been its attraction to wealthy and important as a retirement place and health spa, this has been the case for 150 years, different from Aviemore’s history, the local plan appears to want to stifle the opportunity for people to buy homes in Ballater. Without the constant influx of grey money, Ballater will die. The policy for Ballater has to have high value housing development of the type that will attract people to retire to Ballater and subsidise affordable housing.
- 8.18 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. The allocation in Ballater reflects the future provision identified in the adopted Aberdeenshire Local Plan and makes reference to the work by the Princes Foundation. The established housing stock in Ballater has many high value properties and future development will cover a range of sizes and tenures. 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. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply.
- 8.19 **(096)** Objection: Objects, no problem with selected NPP outcomes 2012 and action programme other than those for making housing more affordable and sustainable. No statistical evidence that a “need” exists for new house building in Ballater other than to satisfy 2<sup>nd</sup> home owners and pressure from builders federations and lobbyists, not to mention cash strapped landowners. Further object to so called specialists who know nothing about how local communities function who allocate any vacant area for housing. Properties not bought as 2<sup>nd</sup> homes will presumably be bought by local young people. Where are new jobs coming from – only forestry, agriculture, tourism locally? This is ill conceived policy requiring a rethink, identify the real need. In response to 1<sup>st</sup> mDLP main objection is that it is a theoretical model of housing need without recognition of what happening in Ballater. Restates points made previously regarding where is local housing need and where are jobs coming from? In response to 2<sup>nd</sup> mDLP objects to methodology of implementation of consultation process and request further consultation on 2nd modifications. Refers to late addition in 5.28 p40 of 2 important sources of information with little time for them to be examined. Makes specific references to Ballater H1 allocation and states that development solely for affordable housing would be acceptable on infill and brownfield sites if accompanied by removal of the allocation. Raises specific objections to Policy 21. Objects to reference in CD7.9 Communities Scotland report to 75% 2/3 bed units benchmark when need is for smaller units in Ballater. Objects to Policy 30 Provision for Gypsies/Travellers.
- 8.20 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. Planning cannot control 2<sup>nd</sup> homes. The allocation in Ballater reflects the future provision identified in the adopted Aberdeenshire Local Plan and makes reference to the work by the Princes Foundation. A more detailed response is contained in evidence relating to the Ballater HI allocation. Likewise with Policies 21 and 30. CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land supply. It is also recommended that the reference to 75% 2 and 3 bedroom units in para 5.58 is removed. These suggested changes have not been endorsed by the CNPA Board. 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. The commendation to the Reporters highlights the changes referred to above that are proposed to clarify housing land requirement and supply.

8.21 **(091a,b,g,h,j,k,l,m,n)** Objection: Objects, the Community Council fully supports the future development outline for Ballater as proposed by the Princes Foundation. The plan focuses too heavily on housing provision and not enough on employment and infrastructure needed for housing development. Employment creates the need for housing. Affordable housing needs are directly linked to requirements of full time employment. Settlement boundary should include the Craigendarroch complex and the wooded area around the school. Omissions including battlefield site and souterrain. Crathie should be a settlement. History of Ballater different from other places in the Park established as a “spa”. View of some of Community Council, without present day incomers Ballater will die, they help boost village economy. Some members of the CC believe land must be available for high value housing for such persons which will help subsidise affordable housing. The CC believes that housing requirements in NEST do not reflect the needs of The Park. Many residents consider 250 units proposed for Ballater alone is overdevelopment and is unacceptable. The Plan does not take account of the 60 or more built since 2002. The Plan has formed policy for Park as a whole when needs of Ballater are quite different from other settlements. Number of affordable houses in Ballater for local people and for commercial employment needs has not been established. The CC does not see how Ballater can sustain 30% affordable housing. Not all agreed on mixed developments. Should recognise needs of Ballater for low cost housing for young and old as well as high value to help pay for low cost. Maintain character of village that delights tourists and residents alike. Most of this will be fulfilled if plans of Princes Foundation are put into action. Use of local authority and housing association waiting lists does not help meet local needs. Need provision for hotel and hostel accommodation, a designated parking area for the Games and more recreational facilities. Unable to support Ballater HI. Objections maintained to 1<sup>st</sup> mDLP and to 2<sup>nd</sup> mDLP.

8.22 **Response:** Topic Paper 1 “Statutory National Park Context” (CD7.21), Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23), and Topic Paper 4 “Site Selection” (CD7.24) 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. The Local Plan allocated sufficient and adequate supply of housing land. The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including opportunities for employment. Employment land has been included in settlements to compliment housing. It should be noted that Scottish Enterprise Grampian, who no longer object to the Plan, were of the view that housing precedes employment. The CNPA has endeavoured to pursue housing and employment via allocations and policies. The majority

of points in this objection are specific to Ballater and more detailed responses are made in respect of that settlement. CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land supply. These suggested changes have not been endorsed by the CNPA Board. 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. The commendation to the Reporters highlights the changes referred to above that are proposed to clarify housing land requirement and supply.

## 9.0 Conclusions

It is commended to the Reporter that the objections to the general approach to housing land supply as listed above are rejected. No issues are raised that could lead the Cairngorms National Park Authority to consider the approach deficient. Although it does not have a bearing on these particular general objections, CNPA officers are recommending revisions to Tables 2-4 in the Deposit Local Plan to clarify the housing land requirement calculation and the phased land supply. It is also recommended that the reference to 75% 2 and 3 bedroom units in para 5.58 is removed. These suggested changes have not been endorsed by the CNPA Board.(CD7.28)

## 10.0 List of documents (including Core Documents)

- CD1.3 The National Parks (Scotland) Act 2000
- CD1.18 Cairngorms National Park Designation Order 2003
- CD7.21 Topic Paper 1 “Statutory National Park Context”
- CD7.23 Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing”
- CD7.24 Topic Paper 4 “Site Selection”
- CD6.13 Cairngorms National Park Deposit Local Plan as at 2<sup>nd</sup> modifications
- CD7.1 Cairngorms National Park Plan 2007
- CD2.4 SPP3 Housing (2003) & SPP3 Housing (2008)
- CD2.11 SPP15 Planning for Rural Development (2005)
- CD4.2 PAN38 Housing Land
- CD2.1 Scottish Planning Policy
- CD6.2 The Highland Structure Plan 2001
- CD6.1 North East Scotland Together 2001
- CD6.3 The Moray Structure Plan 2007
- CD6.4 Dundee and Angus Structure Plan 2002
- CD7.10 CNP Population and Household Projections – University of Manchester 2005
- CD8.14 Impact of Second and Holiday Homes in Rural Scotland – University of York 2005
- CD7.8 Cairngorms Housing System Analysis – Heriot Watt University 2006
- CD7.9 Planning for Affordable Housing in the Cairngorms National Park – Heriot Watt and 3 Dragons Consultancy 2008
- CD8.12 Population and Household Projections for Scotland’s National Parks – GROS 2008
- CD7.3-7.5 CNPA Committee Reports
- CD8.8 The Princes Foundation for the Built Environment – Ballater Summary Report Enquiry by Design 2006
- CD7.28 CNPA Officer Proposed Post Inquiry Modifications

## **11.0 Cairngorms National Park Authority Witnesses for Hearing**

- Don McKee – Head of Planning
- Gavin Miles – Strategic Planning and Policy Officer