

Badenoch & Strathspey Conservation Group
STATEMENT OF EVIDENCE
Hearing Session

Provision of the Local Plan

5.23 Housing

Summary of objection(s)

The argument advanced appears over simple and thus misleading. Providing more affordable housing through large scale, predominantly open market developments, does not necessarily support a more sustainable community. Already at least one community council in the NP has indicated that affordable housing in their community has not increased the community's sustainability, and exacerbates rather than alleviates the demand for affordable housing.

Any major housing proposal can be divisive within, rather than supportive to a community. The large scale housing proposed in the LP is typically a contentious issue within a community. More houses mean less countryside and less of the associated environmental, social, physical and mental health, and economic benefits derived from the countryside.

There is a sizeable body of opinion in any community that validly does not regard the loss of countryside and its numerous economic and social benefits as supportive of a sustainable community.

The provision of affordable housing as a proportion of large scale open market housing, as is proposed in the LP, is contentious. This approach has already created conflict between communities and the National Park Authority. Recently, in Kingussie, around 200 people attended a meeting because of their concern at a 300-house proposal for the town.

The need for affordable housing will predictably rise as a result of the increased population associated with the housing allocations in the LP (as each new generation of new households -first time buyers or households seeking rented accommodation - enters the housing market). The LP is promoting unsustainable growth at the expense of the special qualities of the Park.

We are unconvinced by the sentences "It is acknowledged within the NPP that the population of the CNP is expected to rise and that there are likely to be more households seeking accommodation". The overall population is indeed predicted to rise by some 9%, but within this, the population below the age of 40 is in fact due to fall by some 30%. This is the main age sector seeking affordable housing. Therefore the forecast rise in population does not simply translate into greater need for affordable housing.

Recommendation.

CNPA delete parts of 5.23, including references to affordable housing supporting communities,

CNPA ensures that all points made are factually strictly accurate and in addition do not mislead the reader (e.g. population changes)

“Mr Scott Bruce Chairman of Carrbridge Community Council said ” In the old days we used to get 3 or 4 houses per annum. Our last big development resulted in 25 affordable houses in 1995; 12 years later we got eight, and now we are getting 24 homes, and then nothing for the foreseeable future. This strikes us, and many residents, as unsustainable social development, and in fact if anything, creates a greater future housing need rather than alleviating the problem”.

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5.33 Housing Issues in NP

Summary of objection(s)

The higher figure should not be used and the reason for this of coping with unforeseen circumstances is weak, and arguably demonstrates bias in favour of development. Given the importance of the environment to the NP the lower figure should be used. This approach fails to give proper priority to enhancing and conserving the special environment of the NP in line with the 1st aim.

We are already approximately a third of the way through the relevant time period (2006-2016).
The economic downturn.

Assumptions about likely future conditions were made in a time of boom, before the present economic crisis, which is impacting on our district and may reduce the scale of in-migration, one of the sources of new households and increase in population.

Recommendation.

The lower figure (of 750) should be used, not the higher figure (of 950).

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5.34 Housing Issues in NP

Summary of objection(s)

The first sentence is confusing in its sense – what is the actual dilemma being referred to? Is the dilemma (whatever it is) one that only or particularly applies to a NP?

We are concerned at the suggestion that the NP faces an overriding problem in relation to housing need, when in fact the NP faces many major problems, and housing should not be construed as of overriding importance, compared to, say, biodiversity challenges, or climate change problems.

The final sentence states, in a completely unqualified fashion, that the CNPA etc '**need** to work together to provide housing to **meet everyone's needs**'. Yet the CNPA has an overriding legal obligation to deliver its primary duty of the 1st aim. Where, as is likely with housing allocations, conflict arises between the 1st and other aims, the 1st aim takes precedence. This sentence raises false expectations, or expresses a naïve failure to appreciate that conflict frequently arises as a result of housing allocations.

Recommendation.

Clarify or delete first sentence, and do not indicate that the NP faces a dilemma that is common to many bodies.

Delete or reword the final sentence, e.g. need to work together to seek, where appropriate, to provide housing to meet housing needs.

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5.35 Housing Issues in NP

Summary of objection(s)

Implication in 1st sentence that the land allocations made in the Local Plan for affordable housing are to meet the 'needs of the Park's communities'. The allocation of affordable housing only slightly favours local people or people with a local connection within the Park (by providing additional points); therefore affordable housing can only to a degree be geared towards meeting the needs of the Park's communities.

The frequent repetition in the LP of meeting the affordable housing needs of the communities within the Park is misleading and undermining to the credibility of the CNPA.

The inference in the 1st sentence that the land allocation made in the LP for market housing meets economic and social needs of local communities is misleadingly simplistic, as large-scale market housing developments have many and significant negative impacts on the economic and social needs of local communities, both present and in the future.

The lack of reference to the fact that land for housing is a finite resource.

Recommendation.

Qualify 1st sentence to accurately reflect

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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.

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5.39 Housing land requirement and supply

Summary of objection(s)

Assumption made about consented land supply only making partial contribution to strategy of LP

Lack of clarity and relevant information as to what the implications of this assumption are.

Recommendation.

Provide relevant information to explain the implications of this assumption.

We may have other recommendations to make, depending on the implications of the assumption.

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5.41 Housing Policies

Summary of objection(s)

The scale and pace of expansion of communities is excessive . This approach does not necessarily meet “local needs” well, nor support sustainable communities and their economies.

Recommendation.

Omit “to meet local needs, thus supporting sustainable communities and their economies”.