Date:			
Issue:	General Housing incl. Affordable		
Objector(s):	Dr. A Watson	Objection ref(s):	020j
	DW & IM Duncan		037p

Reporter	Mrs Jill Moody and Mr Hugh Begg
Procedure	Written

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 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. These have not been endorsed by the CNPA Board. (CD7.28)

2.0 Provision of the Local Plan:

2.1 Section 5 paras. 5.22 – 5.76 and Policies 21 – 26 provide the Local Plan context and approach to making provision for the housing needs of communities in the National Park. Specific housing allocations are contained in the settlement proposals in Section 7 of the document. Tables 2, 3 and 4 set out the housing land requirement calculation and the phased land supply.

3.0 Summary of objection(s)

- 3.1 2 objections raising 5 issues wish to be considered via the written procedure:
 - P41 DLP incorrect use of "mix" and replace "proactive" (020j)
 - 5.34 DLP say council houses not property and what is policy on sale of council houses, why not say it should end? (020j)
 - 5.39 DLP accepts the rapid increase of housing for commuters, holiday homes etc. and accompanying impact on habitats etc. (020j)
 - Objections maintained to mDLP (020j)
 - Where is the local requirement for 300 houses in Kingussie? (037p)

4.0 Summary of Cairngorms National Park Authority Response

4.1 The CNPA has clearly set out the context for its approach to housing provision in the Deposit Local Plan and has offered further clarification via the modifications. The scale of development in the Plan is considered appropriate and necessary to contribute to achievement of the 4th aim within the overall purpose of the CNPA to collectively achieve all of the aims in a co-ordinated way. Topic Paper I "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) expand on this and set out the approach to the allocation of land, including issues surrounding the collection of data. There has been a large amount of work carried out on the level of housing required for communities in the National Park and the CNPA has used this to provide a robust approach that takes account of the wider National Park context. The Local Plan (page 5) makes it clear that proposals must comply with all relevant policies and thus monitoring of developments for impact on natural and cultural heritage would be picked up throughout the plan and particularly under Policy I. References to specific sites will be addressed in the CNPA response to relevant policies and allocations.

5.0 CNPA Commendation to Reporter

5.1 It is commended to the Reporter that the objections to the general approach to housing 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. These have not been endorsed by the CNPA Board. (CD7.28)

6.0 Strategic issues

6.1 Sections 2 and 5 of the Local Plan along with Topic Paper I "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 **020j** Objection: Objects to P41 DLP incorrect use of "mix" and replace "proactive", 5.34 DLP should say council houses not property and what is policy on sale of council houses, why not say it should end? Also 5.39 DLP accepts the rapid increase of housing for commuters, holiday homes etc. and accompanying impact on habitats etc. Objections maintained to mDLP.
- 8.2 **Response:** The rationale for the CNPA approach to housing land supply is clearly set out in the Deposit Local Plan. The CNPA offered further clarity via the changes made in the Ist modifications. Topic Paper 3 "Approach to Housing Land Supply and Affordable Housing" (CD7.23) further explains the approach with reference, inter alia, to the CNPA purpose under the National Parks (Scotland) Act 2000 and to Scottish Planning Policy. Para 5.29 in the modified Local Plan clarified the issue of need. Extracts from the National Park Plan on p41 of the DLP are for information and cannot be changed. Other text was revised in the 2nd modifications to provide greater clarity for housing policies. The Local Plan is not the place to object to Council house sales. The specific impacts of greater housing provision were assessed within the context of allocations and the wider SEA.
- 8.3 (037p) Objection: Objects, where is the local requirement for 300 houses in Kingussie?
- 8.4 **Response:** The rationale for the CNPA approach to housing land supply is clearly set out in the Deposit Local Plan. The CNPA offered further clarity via the changes made in the Ist modifications. Topic Paper 3 "Approach to Housing Land Supply and Affordable Housing" (CD7.23) further explains the approach with reference, inter alia, to the CNPA purpose under the National Parks (Scotland) Act 2000 and to Scottish Planning Policy. Provision for housing is focused on strategic settlements, of which Kingussie is one, and this is in accordance with the adopted National Park Plan. Kingussie cannot be looked at in isolation; it has to be considered within the wider Badenoch and Strathspey and National Park context.

9.0 **Conclusions**

9.1 It is commended to the Reporter that the objections to the general approach to housing 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. These 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 I "Statutory National Park Context"	
• CD7.23	Topic Paper 3 "Approach to Housing Land Supply and Affordable Housing"	
 CD7.24 	Topic Paper 4 "Site Selection"	
 CD6.9 	Consultative Draft Cairngorms National Park Local Plan 2005	
 CD6.13 	Cairngorms National Park Deposit Local Plan as at 2 nd 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	
• CD7.28	CNPA Officer Proposed Post Inquiry Modifications	