

Session:		Date:	
Issue:	General – Housing Land Supply		
Objector(s):	Dinnet and Kinord Estate	Objection ref(s):	438b
	Goldcrest (Highland) Ltd		445a
	McLeod Building Ltd		389
	DW and IM Duncan		037h, 037a, 037g
	John M Smith		387
	Albyn Housing Association		385b
	The Cairngorms Campaign		448f
	North East Mountain Trust		443f
	Clare Jenkins		057
	The Clouds Partnership		398c
	Dr. A Watson		020a
	John Davison		344

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 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 23 objections raising some 19 issues have been lodged on the general issue of housing land supply:

- Want Dinnet to be identified as a settlement with provision for housing amounting to around 60 units. The National Park Plan requires enough effective land and the Estate consider the phased land supply in the Local Plan fails to do this. As planning authority estimates overall supply it is essential to have flexibility to accommodate uncertainty and highest growth scenario. Figures in Table 2 should be enhanced to allow for level of housing necessary for Dinnet. **(438b)**
- Want more sites identified for housing in Nethybridge on basis that the DLP highlights there is no exact measure of future requirement, the Cairngorms Housing System Analysis 2006 identified future population growth, and consultation supported allocation of satisfactory amount of land. Therefore essential to increase supply and flexibility built in for highest growth scenario. Wants Tables 2-4 modified to allow for more residential development in Nethybridge. **(445a)**
- Local long established building firm employing over 30 staff considers Local Plan favours bigger builders from outwith the Park and wants more small and one-off dwelling sites. **(389)**
- Total allocation of housing units in Table 2 is unsustainable, concern at allowance for 500 units as 2nd homes, scale of housing will have negative impact and damage important habitats and landscape/character of settlements mainly in Badenoch and Strathspey in areas such as An Camas Mòr, Carrbridge, Nethy Bridge, Aviemore, Boat of Garten, Netwonmore, Kincaig. In response to 1st and 2nd modifications maintain objections and still have serious concerns regarding extent of zoning for new housing and believe a major housebuilding programme is at odds with 1st aim of Park. **(037h, 037a)**
- Objects to omission from the DLP of 2 sites at Dalfaber Road, Aviemore as housing opportunity sites and their exclusion from settlement boundary. Refer to SPP3, consider there may be a short to medium term shortfall of supply of effective housing land, the sites relate well to town centre and transport links, parts of the sites have been previously used as a carpark and sewage works. Refer to SPP7, the site although within SEPA 1 in 200 year flood risk area would incorporate measures to protect new development from flooding and would extend protection to properties currently affected by flooding. Considers sites can have landraising measures to comply with SPP7. Inclusion of the sites accords with the Highland Structure Plan. It will accord with Policies 13 and 17 of the DLP. Contests ability of An Camas Mòr to contribute to effective land supply in DLP. An Camas Mòr requires a pedestrian bridge across the Spey and this site will give it a landfall. Inclusion of the sites will contribute to the achieving National Park Plan strategic objectives for housing. **(387)**
- Concern that relatively little new land has been added to the existing land allocation. Over reliance on An Camas Mòr because of significant infrastructure challenge it poses. Indicative density levels a concern in a plan not over supplied with allocated land. **(385b)**
- Approach is seriously deficient and incompatible with 1st, 2nd and 4th aims. Concern focuses on scale of holiday homes construction envisaged in Table 2, need provision to meet demand for local population. Concern that scale and number of proposed housing developments are already affecting the natural resources of the Park. Object to current housing policies and approach that would permit such development. **(448f, 443f)** On 1st modification maintain objection as shortage of affordable housing for residents is most important social issue. Refers to objection by Badenoch and Strathspey Conservation Group to previous draft. **(448f)**
- Concern at unsustainable growth, need housing for local people, but to make an allowance for 2nd homes is inexcusable. They add little to local economy; many empty for large proportion of year, contribute little to social or financial fabric of the area, keep property prices high and keep property unavailable for local people. Personal experience of this. CNPA policy will make this problem worse, more building will detract from the beauty of the area, CNPA meant to promote sustainable development and protect a sensitive area rather than allowing itself to be controlled by market forces. Implore you to review policy and protect this area and promote affordable housing for those who live and work here. **(057)**
- Objects to Section 5, Table 4 and Section 7 Aviemore and An Camas Mòr. Kinakyle is approximately 60 ha in area and subject to SEPA flood map has 20ha available for residential and

associated development. The National Park Plan requires effective land for market and affordable housing to meet economic and social needs of communities throughout the Park. SPP3 and SPPI5 require an effective land supply. Table 4 in relation to Aviemore is not in accordance with the National Park Plan and there is not an effective ongoing 5 year land supply which does not accord with SPPI. Over-reliance on An Camas Mòr, and Kinakyle should be allocated as an effective housing site. **(398c)**

- Hardly appears to be for a National Park because it is overwhelmingly about new housing, out of 96 pages, 50 are on living and working, with only 18 on conserving and enhancing, and 4 on enjoying and understanding. Lopsidedness is highly revealing. **(020a)**
- Para 5.27 DLP, ironic that designation of National Park has led to increase in demand for housing which adds to prices. **(037g)**
- The Park should be something different from non-park. No difference between Aviemore and development around Inverness. DLP envisages more such development. Not clear who the houses are for. What will happen after 5 years, where will land be sacrificed? DLP assumes continued growth and stability in housing market – if house prices drop 25% you won't see developers for dust. In response to 1st mDLP, the Park should be “an icon of peace and beauty”. **(344)**

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. 2nd homes are not controlled by the planning system. The Local Plan allocated sufficient and adequate supply of housing land. The 1st modifications identified Dinnet as a Rural Settlement and stated that it had opportunities for additional housing. Policies 22, 23, 24 offer opportunities for small builders. Various allocations have requirements for masterplans or development briefs with specific reference to providing opportunities for small builders. 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. CNPA staff continue to work with the project promoters for An Camas Mòr (CD7.25) to ensure it is delivered to support the Local Plan. 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. 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 **(438b)** Objection: Objects, want Dinnet to be identified as a settlement with provision for housing amounting to around 60 units. The National Park Plan requires enough effective land and the Estate consider the phased land supply in the Local Plan fails to do this. As planning authority estimates overall supply it is essential to have flexibility to accommodate uncertainty and highest growth scenario. Figures in Table 2 should be enhanced to allow for level of housing necessary for Dinnet.

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 1st modifications identified Dinnet as a Rural Settlement and stated that it had opportunities for additional 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, but it is not proposed to allocate any land for housing in Dinnet at present.

8.3 **(445a)** Objection: Objects, want more sites identified for housing in Nethybridge on basis that the DLP highlights there is no exact measure of future requirement, the Cairngorms Housing System Analysis 2006 identified future population growth, and consultation supported allocation of satisfactory amount of land. Therefore essential to increase supply and flexibility built in for highest growth scenario. Wants Tables 2-4 modified to allow for more residential development in Nethybridge.

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 within Nethybridge and elsewhere. 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, but it is not proposed to allocate more land for housing in Nethybridge at present.

- 8.5 **(389) Objection:** Objects, local long established building firm employing over 30 staff considers Local Plan favours bigger builders from outwith the Park and wants more small and one-off dwelling sites.
- 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 CNPA has been aware of the concerns of small builders within the Park and has been mindful of them when preparing the Local Plan. Policies 22, 23, 24 offer significant opportunities for small builders. Various allocations have requirements for masterplans or development briefs with specific reference to providing opportunities for small builders. 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 and any future identified need for small builders will be addressed via this process. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply, but it is not proposed to allocate more land at present.
- 8.7 **(037h, 037a) Objection:** Objects, total allocation of housing units in Table 2 is unsustainable, concern at allowance for 500 units as 2nd homes, scale of housing will have negative impact and damage important habitats and landscape/character of settlements mainly in Badenoch and Strathspey in areas such as An Camas Mòr, Carrbridge, Nethy Bridge, Aviemore, Boat of Garten, Newtonmore, Kincaig. In response to 1st and 2nd modifications maintain objections and still have serious concerns regarding extent of zoning for new housing and believe a major housebuilding programme is at odds with 1st aim of Park.
- 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. 2nd homes are not controlled by the planning system. The Local Plan allocated sufficient and adequate supply of housing land. 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. 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, but the level of housing provision is unchanged.

- 8.9 **(387)** Objection: Objects to omission from the DLP of 2 sites at Dalfaber Road, Aviemore as housing opportunity sites and their exclusion from settlement boundary. Refer to SPP3, consider there may be a short to medium term shortfall of supply of effective housing land, the sites relate well to town centre and transport links, parts of the sites have been previously used as a carpark and sewage works. Refer to SPP7, the site although within SEPA I in 200 year flood risk area would incorporate measures to protect new development from flooding and would extend protection to properties currently affected by flooding. Considers sites can have landraising measures to comply with SPP7. Inclusion of the sites accords with the Highland Structure Plan. It will accord with Policies 13 and 17 of the DLP. Contests ability of An Camas Mòr to contribute to effective land supply in DLP. An Camas Mòr requires a pedestrian bridge across the Spey and this site will give it a landfall. Inclusion of the sites will contribute to the achieving National Park Plan strategic objectives for housing.
- 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. The Local Plan allocated sufficient and adequate supply of housing land. CNPA staff continues to work with the project promoters for An Camas Mòr to ensure it is delivered to support the Local Plan. The objector’s site is within an area that provides an open landscape context between Aviemore and An Camas Mòr. It has been allocated for recreation and amenity woodland in the existing Badenoch & Strathspey Local Plan. It is within the SEPA I in 200 year flood risk area and if proposed would almost certainly give rise to an objection from SEPA. Gillespie Investment Group had recently applied for planning permission to raise land for flood prevention to the west of the River Spey and to rear of Dalfaber Road (09/053/CP). That applicant has now withdrawn the planning application because, inter alia, of the costs in preparing further supporting information. Flood risk remains an issue. It is therefore not considered that it could contribute to an effective land supply even if there was a need for additional land and there was no constraint in terms of landscape impact. Land allocation in this area would also have to be subject to an appropriate assessment, because of the Spey SAC, and also to SEA. 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, but it is not proposed to allocate further land.
- 8.11 **(385b)** Objection: Objects, concern that relatively little new land has been added to the existing land allocation. Over reliance on An Camas Mòr because of significant infrastructure challenge it poses. Indicative density levels a concern in a plan not over supplied with allocated land.

- 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 allocated sufficient and adequate supply of housing land and expected densities reflect the combined desire for efficient use of available land and wider affordability. CNPA staff continue to work with the project promoters for An Camas Mòr to ensure it is delivered to support the Local Plan. 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, but it is not proposed to allocate further land.
- 8.13 **(448f, 443f) Objection:** Objects, approach is seriously deficient and incompatible with 1st, 2nd and 4th aims. Concern focuses on scale of holiday homes construction envisaged in Table 2, need provision to meet demand for local population. Concern that scale and number of proposed housing developments are already affecting the natural resources of the Park. Object to current housing policies and approach that would permit such development. **(448f)** On 1st modification maintain objection as shortage of affordable housing for residents is most important social issue. Refers to objection by Badenoch and Strathspey Conservation Group to previous draft.
- 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. There is recognition that second and holiday homes are largely outside planning control. 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. 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, but it is not proposed to reduce the land allocation.
- 8.15 **(057) Objection:** Objects, concern at unsustainable growth, need housing for local people, but to make an allowance for 2nd homes is inexcusable. They add little to local economy; many empty for large proportion of year, contribute little to social or financial fabric of the area, keep property prices high and keep property unavailable for local people. Personal experience of this. CNPA policy will make this problem worse, more building will detract from the beauty of the area, CNPA meant to promote sustainable development and protect a sensitive area rather than allowing itself to be controlled by market forces. Implore you to review policy and protect this area and promote affordable housing for those who live and work here.

- 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. There is recognition that second and holiday homes are largely outside planning control. The Plan does promote affordable housing, but it cannot be delivered in isolation, particularly in the numbers required. Reference is made to evidence under Policy 21. 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. 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, but it is not proposed to reduce the land allocation.
- 8.17 **(398c) Objection:** Objects to Section 5, Table 4 and Section 7 Aviemore and An Camas Mòr. Kinakyle is approximately 60 ha in area and subject to SEPA flood map has 20ha available for residential and associated development. The National Park Plan requires effective land for market and affordable housing to meet economic and social needs of communities throughout the Park. SPP3 and SPP15 require an effective land supply. Table 4 in relation to Aviemore is not in accordance with the National Park Plan and there is not an effective ongoing 5 year land supply which does not accord with SPPI. Over-reliance on An Camas Mòr, and Kinakyle should be allocated as an effective housing site.
- 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 and accords with SPP3 and SPP15 as highlighted in Topic Paper 3. CNPA staff continue to work with the project promoters for An Camas Mòr to ensure it is delivered to support the Local Plan. Specific evidence on the non-allocation of land at Kinakyle is given in relation to Aviemore. 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 current housing allocation is considered to be sufficient and no further modifications are proposed. 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 and the contribution of An Camas Mor and need for additional land will be assessed via this process. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply, but it is not proposed to increase the land allocation.

- 8.19 **(020a)** Objection: Objects, hardly appears to be for a National Park because it is overwhelmingly about new housing, out of 96 pages, 50 are on living and working, with only 18 on conserving and enhancing, and 4 on enjoying and understanding. Lopsidedness is highly revealing.
- 8.20 **Response:** The thrust and intent of the Plan is not governed by the number of words written on a particular topic. 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 I that has been clarified in modifications and underpins the Plan with regard to the 4 aims. 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, but there is no change in approach.
- 8.21 **(037g)** Objection: Objects, para 5.27 DLP, ironic that designation of National Park has led to increase in demand for housing which adds to prices.
- 8.22 **Response:** Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) expands on the approach to housing land supply. The commendation to the Reporters highlights the changes that are proposed to clarify housing land requirement and supply, but there is no change in approach.
- 8.23 **(344)** Objection: Objects, the Park should be something different for non-park. No difference between Aviemore and development around Inverness. DLP envisages more such development. Not clear who the houses are for. What will happen after 5 years, where will land be sacrificed? DLP assumes continued growth and stability in housing market – if house prices drop 25% you won’t see developers for dust. In response to 1st mDLP, the Park should be “an icon of peace and beauty”.
- 8.24 **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 for communities in the Park. 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 I that has been clarified in modifications and underpins the Plan with regard to the 4 aims. 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. This will include the character of the development and the effects on the special qualities of the Park. 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, but no changes are proposed.

9.0 Conclusions

- 9.1 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)

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 2nd 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
- CD7.25 CNPA Committee Report – An Camas Mòr Principles December 2008