

Representation, summary and analysis – General Housing

Policy Housing (General)

Name Mr D Carrott

Company

Objector Ref

021a

Representation

The consultation process is not entirely transparent and in some areas could be misleading.

- a) The Deposit Local Plan documentation was only forwarded to people who previously made comments which could preclude others getting involved in this important debate.
- b) The Land Use of Community included on the settlement plans also includes Affordable Housing. As there is a colouring currently used for housing, the presentation seeks to mislead.
- c) It is not made abundantly clear that affordable housing for the community does not necessarily mean the local community to which a settlement plan directly refers. The word community means a much wider area than that covered by an individual settlement plan. Again this is misleading.
- d) It seems to go against the value of having a Plan when there is a catch all statement that indicates that any windfall site could be used for housing. It follows that any suitable site outwith the designations on the Plan could be used for housing without going through the consultation process.

Summary

The consultation process is not transparent and could be misleading.

- a) The Deposit Plan was only forwarded to people who previously made comments which could preclude others getting involved.
- b) On the proposals maps 'Community' use also includes Affordable Housing. This is confusing as there is a separate colour used for housing.
- c) It is clear that affordable housing for the community does not necessarily mean the local people from that settlement.
- d) It contradicts the value of the Plan to have windfall sites which could be used for housing. This implies that any suitable site outwith the designated areas could be used for housing without going through the consultation process.

CNPA analysis

The comments are noted. The consultation on the Deposit Plan has exceeded the requirements of the guidelines prepared by the Scottish Parliament, and every effort has been made to contact as many people within the community and other interested groups and individuals. The level of response is testament to the efforts made. The comments regarding the terminology used on the proposals maps are noted, and clarification on the terms used will be included as a proposed modification. The comments regarding affordable housing are also noted and further clarification on this point will be added to paragraphs 5.47-5.60.

The comments regarding windfall sites are noted. National planning guidance allows for the consideration of such ad hoc sites for all forms of development, where applications are judged against the policies within the Plan regarding such considerations as impact on the landscape, design, sustainability, impact on natural heritage, etc. Consideration will be given however to the need for an additional policy to consider development proposals within settlements, and also further clarity on how development proposals outwith settlement boundaries are assessed.

Representation

The general approach to determining the housing land requirement seems a sound one that should allow sufficient flexibility to respond to housing supply pressures over the period of the Plan. We would, however, have expected to see a clear distinction between the established land supply and the effective supply, together with evidence of how these sites contributed to meeting a five year land supply for the Park Area.

There has been some difficulty in understanding the housing land allocations of the Local Plan, and what the allocations amount to over different time periods. The lack of a clear base year for the Plan confuses this further and it is not apparent why the housing tables only look to 2016. Does this relate to the GRO figures? The reference in Tables 3 and 4 to 5 years and 10 years would be better set out in actual years, e.g. 2006-2011 (5 years) or 2006-2016 (10 years).

The footnote to Table 3 requires re-wording as it is not clear why this assumption is made.

There would be benefit in the inclusion of tables showing each site allocated in each settlement (which are listed in Table 4) along with totals for each settlement, showing how these contribute to the housing land requirement. This would also be useful in relation to economic development sites and could be included as an appendix.

There is also no overarching housing policy which allocates land, makes provision for review of the land supply and for replacement where sites may no longer be effective. Neither is there policy provision for consideration of applications for windfall or redevelopment sites within the main settlements. A definition of windfall sites in the glossary would also be helpful.

Reference is made in paragraph 5.31 to the Cairngorms Housing System Analysis, which is considered relevant to existing structure plan housing land requirements. However it is not clear the extent to which the housing land requirement set out in the plan relates to the findings of the study.

Summary

There should be a clear distinction between the established land supply and the effective supply, together with evidence of how these sites contributed to meeting a 5 year land supply for the Park. The housing land allocations are confusing and the lack of a clear base year for the Plan adds to this. Why do the housing tables only look to 2016. Does this relate to the GRO figures? The reference in Tables 3 & 4 to 5 years and 10 years would be better set out in actual years, e.g. 2006-2011 (5 years) or 2006-2016 (10 years).

The footnote to Table 3 should be amended to explain why this assumption is made. Within the tables each site allocated within each settlement should be displayed along side the totals for that settlement and how that contributes to the overall housing land requirement. This would also be useful in relation to economic development sites and could be included as an appendix.

There is a need for an overarching policy which allocates land, makes provision for review of the land supply and for replacement where sites may no longer be effective, and also for the consideration of windfall or redevelopment sites within the main settlements. A

definition of windfall sites should be included in the glossary. Para 5.31 refers to Cairngorms Housing System Analysis, but it is not clear the extent to which the housing land requirement set out in the plan relates to the findings of the study.

CNPA analysis

The comments regarding the housing calculations and the terminology are noted. A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Further clarification will also be included within the explanatory tables to make them easier to understand.

The need for an additional policy regarding land allocation, review and site replacement will be considered as a modification to ensure the appropriate level of clarity is contained within the Plan.

Policy Housing (General)	Name James and Evelyn Sunley	Company	Objector Ref	056i
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Representation

5.1 to 5.3 We stated that the Park's attempt to make "one size fit all" is of particular importance in relation to "sustainable communities". Ballater would not exist if it had not been its attraction to the wealthy and important as a retirement place of residence and health spa. This has been the case for more than one hundred and fifty years. Very different to Aviemore's history. The Park Local Plan appears to want to stifle the opportunity for people to buy homes in Ballater in its housing policy (5.21/5.85) Without the constant influx of 'grey money' Ballater as we know it will die. The spending power of those coming into the village helps sustain many businesses in Ballater, therefore the Sustainable Community policy for Ballater has to contain land for high value housing development of the type that will still attract people who want to retire to Ballater and help subsidise affordable housing in the form of planning gain.

Summary

The housing allocations should recognise the important part of the economy played by retiring people, which could be used to assist affordable housing provision.

CNPA analysis

The approach to housing endeavours to ensure that all sectors of the community have the opportunity to attain their housing aspirations and through the policies in the plan, the current focus is to try and redress the current imbalance for those in need of affordable homes. This is in no way to underplay the importance of the open market sector including those who choose to retire within and to the area. This will be reinforced in a review of the wording within the housing section.

Policy Housing (General)	Name Roy Turnbull	Company	Objector Ref	390u
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Representation

I OBJECT to the large number of houses allocated within the Deposit Local Plan, as outlined in Tables 2, 3 and 4, p.43-44. The figures presented in Tables 2, 3 and 4, p.43-44 have been calculated without any reference to the natural or cultural heritage, yet

development indubitably impacts on the natural and cultural heritage. Likewise the documents "Population and Household Projections for the Cairngorms National Park Authority", University of Manchester, 2005 and "Cairngorms Housing System Analysis", Heriot Watt University, 2006, make no assessment of the impacts of development on the natural and cultural heritage.

This is contrary to the National Park Plan, which emphasises that, "The starting point must always be to work towards all four aims collectively" and reflects the National Parks (Scotland) Act, 2000, which requires that the four aims of the Park must be achieved collectively and in a co-ordinated way. That is not possible if the first aim of the Park, which is impacted upon by development, is ignored during the process of determining how much development should be allocated.

Further, there is no evidence in the Deposit Local Plan that the amount of development initially suggested by the above studies has been adjusted by subsequent consideration of the first aim of the Park. Indeed the summary Strategic Environmental Assessment states that "relatively few changes to the Local Plan have [been] made due to the SEA alone". This could only be justified were there to be no "conflict" between the first aim of the Park and the initial proposals for development, but that is indubitably not the case.

Indeed, there was already ample evidence of conflict between development on the one hand and the natural and cultural heritage on the other well before the Park was established. The following brief list provides a few examples, but it is by no means exhaustive:

Conflicts with the (mainly) natural heritage:

- Proposal for 117 houses within species rich native pinewood at Carrbridge.
- Proposal for 40 houses within ancient woodland site at School Wood, Nethy Bridge
- Proposal for 100+ houses in birch woodland, Aviemore.

Conflicts with the (mainly) cultural heritage:

- Statement in First Draft Highland Regional Council Badenoch and Strathspey Local Plan 1991, thus: "Despite spare capacity in land and infrastructure in most settlements, concern is emerging about the rate and scale of change in established villages. Unsympathetic cramming and expansion of communities is eroding their character and setting, threatening to overwhelm facilities, or creating imbalance in the social structure. ... Similarly in the countryside, stronger safeguards are needed to avoid servicing problems or compromising important heritage features and rural resources."
- A well-attended public meeting in Nethy Bridge on 12th January 2005 voiced unanimous opposition to developments of more than four houses at one location within the village. • The proposal for 117 house at Carrbridge would increase the size of the village by about one third and faced strong local opposition.

That the previous HRC Local Plan was already allocating land for development that impacted on woodlands of high natural heritage value and caused unsympathetic cramming of communities that eroded their character, indicated that further allocations of significant area for development would be attended by significant conflicts with the natural and cultural heritage. The present Deposit Local Plan shows that to be the case.

Further, the CNPA is charged with sustainable development, yet the allocations of land for housing in the Deposit Local Plan indicate a sharp increase in the rate of building over historical rates. 2931 houses were constructed in Badenoch and Strathspey in the thirty year

period from 1976 to 2005, an average of just under 100 houses per year, yet the Deposit Local Plan proposes allocations of land there for 888 houses for years 0-5 and 678 for years 5-10, an average of 177 and 135 per year respectively. Beyond that time (2016) there is an allocation of a further 1426 houses for the "medium to long term", though the deposit Local Plan does not define what that means. If it refers to the year 2025, as in the Univ. of Manchester report, that would equate to an annual allocation rate of 158 houses. On average, these figures, if the allocations were fully developed, would represent a 60% increase in the rate of house building in Badenoch and Strathspey for the next twenty years compared with the previous thirty years. And that is for a district that in recent decades has had the highest rate of growth of any rural district in Scotland.

Whatever is being "sustained" by such growth rates, it is certainly not the "natural and cultural heritage" of the area, which should be the over-riding concern of the CNPA if it is to comply with the National Parks (Scotland) Act, 2000. Instead, what is being sustained is a culture of rampant growth that will be all the more difficult to restrain the longer it is allowed to flourish. It is only necessary to project the proposed allocation rates a hundred years into the future to foresee a Park whose lowlands are significantly impacted upon by either the suburban sprawl of an additional 16,000 houses, or their equivalent in large townships, in Badenoch and Strathspey. And what would then be abundantly apparent is that the crucial mistake was the failure of the first Local Plan produced by the CNPA back in the early years of the twenty-first century to address the true needs of its communities, which is for relatively small numbers of houses for local people, whilst abiding by its statutory function of conserving and enhancing the natural and cultural heritage of the area.

In this context it may be helpful to review the history of housing completions in Badenoch and Strathspey in recent years compared with the projections from the Highland Region Structure Plan 1990, upon which the HRC Badenoch and Strathspey Local Plan was based. The Structure Plan "Estimated Demand for Housing" (Fig.14.3 p.82) gave 965 houses as the total expected for Badenoch and Strathspey for the period 1988-1998. The actual number of housing completions was as follows: 1988-168, 1989-211, 1990-166, 1991-108, 1992-79, 1993-117, 1994-76, 1995-105, 1996-81, 1997-141, 1998-76 giving a total of 1328 houses built during this time, (1206 houses if the series from mid 1988 to mid 1998 is used). Thus, the actual number of houses built in Badenoch and Strathspey during this time was some 37% more than that envisaged in the 1990 Structure Plan.

Para 5.30 p41 The HC Adopted Local Plan 1997 envisaged 2250 houses being built in Badenoch and Strathspey between 1993 and 2011, an average of 125 houses per year. During the last five years (2002-2006 inc.), 615 houses (2002-89, 2003-80, 2004-135, 2005-105, 2006-206), an average of 123 houses per year have been built. Thus, the statement in 5.30 that "in Badenoch and Strathspey, in particular, fewer homes have been built than were anticipated in the Development Plan" is misleading. Although it is true that the average rate of house build in the district has averaged less than that envisaged (95 per year) since 1993, most people reading the Deposit Local Plan will be unaware that they are being misled by the CNPA concerning more recent events in Badenoch and Strathspey.

Second Homes

The most unacceptable feature of the proposals on housing is the proposed increase in provision for second homes (Table 2, page 43), which betrays the driving influence behind the housing allocation figures. Because "demand" is expected to be higher, therefore supply must be increased. This is "predict and provide", the same market forces housing provision that has caused such problems for the natural and cultural heritage, and failed to address local needs, during recent decades. This proposal flies in the face of repeated expressions of concern by local people about the over-supply of second/holiday homes in the Park, briefly and inadequately reported in

the Consultation Report July 2007, para. 3.21, thus: “The ongoing issue of holiday and second homes was also raised as adding to the problem.” In addition to the detrimental effects upon the natural and cultural heritage of the Park, this proposal will also add to its unnecessary carbon (and other resource) footprint. House building is a carbon and resource intensive activity and one must question why the CNPA should be encouraging the building of houses for people who already have a dwelling elsewhere, whilst claiming that it is attempting to minimise its own carbon footprint.

Conclusion

The unacceptable housing allocation proposals in the Deposit Local Plan result from following a policy of “predict and provide”, without due regard to conserving and enhancing the natural and cultural heritage of the area, contrary to the National Parks (Scotland) Act 2000. As a result, significant damage to the natural and cultural heritage is inevitable should these proposals be realised. However, the policies in the CNPA consultative draft local plan for a local residency criteria (Policies 38.d and 39*) present a method of minimising this damage, whilst dealing fairly with the aspirations of local people for low cost housing. I strongly urge the CNPA to adopt these policies. It seems inevitable that the CNPA will be in breach of its statutory duty if the housing allocation proposals in the Deposit Local Plan are followed.

*It is noted that the present Policy 26 has some resemblance to policy 39 of the consultative draft local plan.

Summary

The housing allocation for the Park is too high. The figures and the background documents do not refer to the natural and cultural heritage aspects of the Parks aims. The aims of the park must be considered collectively which cannot happen if the 1st aim is ignored. Has the 1st aim of the Park been taken into account by the background studies? Also the SEA summary states that “relatively few changes to the Local Plan have [been] made due to the SEA alone”. This could only be justified where there is no conflict between the 1st aim of the Park and the proposals for development. This is not the case.

Even before the Park was established there were many cases where developments have been in conflict with the 1st aim of the park – a range of examples are listed regarding both natural and cultural heritage.

The allocations are not sustainable, indicating a sharp increase in build rates. Between 1976-2005 2931 houses were built in Badenoch and Strathspey, an average of just under 100 houses a year. The current plan proposes 888 houses in the next 5 years and 678 for 5-10 years, an average of 177 and 135 houses a year. In the long term a further 1426 are proposed, which would mean that by 2025 an average of 158 houses would be built, and a 60% increase in the rate of house building for the next 20 years. This is not sustainable for the natural and cultural heritage of the area and if this is projected over time the lowland areas would become significantly impacted by urban sprawl. The plan should instead be making provision for a small amount of houses for local people within the confines of the 1st aim of the Park.

Further, the most unacceptable feature of the housing allocation is the provision for second homes in table 2. Why is supply increased just because demand is increasing? This does not address local need or the local concerns regarding holiday and second homes. The previous policies in the consultative draft were a more fair way of managing the situation and meeting local need.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (general)	Name Dr A Watson	Company	Objector Ref	020a
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Representation

Hardly appears to be for a National Park, because it is overwhelmingly about new housing, an impression emphasised by the cover photograph. Out of 96 pages, pages 35-54 and 62-91, i.e. totalling 50, are on living and working in the Park and on settlements. Section 4 on Conserving and enhancing the Park occupies 18 pages, while Section 6 Enjoying and understanding the Park takes up 4 pages. This lopsidedness is highly revealing.

Summary

CNPA need to ensure the plan covers all issues more equally. At the moment, there is an over emphasis on new housing, and living and working in the Park, and not enough focus on conserving and enhancing the national park

CNPA analysis

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the special qualities of the area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use. A review of the Introduction and Context sections is necessary to clarify and refine the vision for the Plan and set out clearly the strategic background to the policies drafted. Similarly further clarification is needed in the introduction section to each Chapter to state clearly the justification for the approach taken and the aspirations sought as a result of implementation of the policies.

Policy Housing (general)	Name Susan Davies	Company	Scottish Natural Heritage	Objector Ref	465o
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Representation

5.21 – 5.41 - The other policies are not supported by such a detailed justification as this rationale for the housing policies. It might be simpler to place this material in an Annex.

Summary

Suggest placing this detailed justification in an annex.

CNPA analysis

The level of detail included in the deposit plan reflects the importance placed on this issue. However, in the revised plan explanatory detail at this level may not be necessary and consideration will be given to the suggestion made.

Policy Housing (general)	Name Dr A Watson	Company	Objector Ref	020j
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Representation

p.41, purple box, incorrect use of mix again.

b), drop "proactive", which is unnecessary and meaningless, use "concentrate" instead of "focus"

5.34 right column, line 3, sale of council houses, why not say this instead of council owned property? Also, what is the policy on this sale of council houses. Why not suggest that it should end?

5.39, accepts the rapid increase of housing for commuters, holiday homes and retired incomers, and the accompanying lack of sustainability of population, energy use, pollution, and destruction of habitats.

5.49, IV, last sentence. A very good idea and policy.

Summary

Incorrect use of language in box regarding the Extract from the National Park Plan.

In 5.34 use 'council houses' not 'council owned property'. Suggest that the sale of council houses should end.

In 5.39 note that the increase in housing will be accompanied by a lack of sustainable growth, energy use, pollution and destruction of habitats.

In 5.49 support this idea.

CNPA analysis

The grammatical errors are noted and the appropriate changes will be made. The reference to para 5.39 is noted. Modifications will endeavour to ensure an appropriate balance is struck between development and the protection of the special qualities of the area as identified as a National Park.

Policy Housing (general)	Name Colonel F.M.K. Tuck	Company	Objector Ref	011a
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Representation

General - As a landowner who has been involved with policy discussions with the Cairngorms Partnership, and the CNPA especially over the drafting of the Local Plan over many years I offer the following commentary as a personal view and not as a representative of the SRPBA or Donside Community Council. It is not possible to confine this to the format of the form as issued and this continuation sheet adds to para 4 of the form.

Comments are listed in sequence through the document.

PARA 5.35 - "landowners" should be added to the list since their participation is usually critical.

Summary

Para 5.35 - Amend wording to include 'landowners'

CNPA analysis

The comment is noted and the wording will be amended.

Policy Housing (general)	Name Mr Michael Bruce Agent Sinead Lynch	Company Glen Tanar Estate	Objector Ref 403h
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Representation

Housing Policies - Glen Tanar Estate broadly supports the proposed changes to the housing policies as contained within the Cairngorms National Park Deposit Local Plan 2007.

Summary

Support the housing policies contained within the deposit plan.

CNPA analysis

No modification considered necessary as a result of this representation.

Policy Housing (links to other plans)	Name Mairi Maciver	Company Communities Scotland	Objector Ref 025c
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Representation

4. We welcome the reference to links with other plans and strategies contained in paras 2.10 and 2.11, but feel more detail is required on links to Local Housing Strategies, particularly under Policy 24 - Contributions to Affordable Housing. More generally, we feel it is very important (see 5 below) that the Housing Section of the Plan gives prominence to Local Housing Strategies and the role of the Local Plan in their implementation.

5. Further to 3 and 4 above and given the major changes between this and the last version of the Local Plan, the response of the 4 Local Authorities, which will have a major role in the Plan's implementation, will be very important. We would therefore suggest that the Housing Section of the Plan kick off with a reference to Local Housing Strategies and the role of the Local Plan as the mechanism for dealing with the land-use implications of implementing the Local Housing Strategies.

Summary

Local Housing Strategies should be given more prominence, with reference to their role in the delivery of the Local Plan established at the start of the Housing section.

CNPA analysis

The links with Local Housing Strategies will be clarified in the text explaining the links between the Local Plan and other Plans and Strategies (para 2.10-2.11). Any further explanation considered necessary within the Housing section of the Plan will be added as appropriate.

Policy Housing (links to other plans)

Name Mairi Maciver

Company Communities Scotland

Objector Ref 025j

Representation

16. We welcome paras 5.27 to 5.35 on housing issues in the National Park, the need to provide a range of opportunities and mechanisms to enter the housing market and a balance of property sizes to allow movement within the open market. It would, however, be useful to provide full detail on the range of opportunities and mechanisms available (include shared ownership) as listed in PAN 74. We would also like to see clear reference to any consideration that has been made of the Homelessness etc (Scotland) Act 2003 and the impact this will have on the homelessness duties of local authorities and registered social landlords, as well as on the Planning Authority area for any potential land-use implications.

Summary

Support the reference to provide a range of opportunities and mechanisms to enter the housing market, and the need to create an appropriate balance of house sizes. Further detail on what mechanisms and opportunities exist would be helpful, as in PAN 74. There should also be clear reference to the Homelessness etc (Scotland) Act 2003 and its impact on the homelessness duties of local authorities and registered social landlords, as well as on the Planning Authority area for any potential land-use implications.

CNPA analysis

Within the section dealing with Housing Issues in the National Park, further clarity will be included on the mechanisms available to address the issues faced. Cross referencing to PAN 74 and the Homelessness etc (Scotland) Act 2003 will be undertaken to ensure the policies are supporting text are in alignment with the advice therein.

Policy Housing (additional land suggestion)

Name John Forbes-Leith Esq

Company Dunachton Estate **Objector Ref** 418t

Agent Debbie Mackay

Representation

My Client object to the following;

- the inclusion of sites KC/H1 and KC/H2 at Kincaig for housing development shown on the plan attached. It is his view that the housing provision for Kincaig would be better met on sites to the north west of the main road through the village.
- the numbers specified for site H1. 40 houses in this location is too dense a development. It would be out of keeping with the settlement pattern of Kincaig which features largely low density development. The adjacent site to the south of H1 has been developed to a density of 28 houses and is approximately the same size as H1 without the drainage issues.
- the figures on Table 4 "Phased Land Supply by Local Authority Area" which indicates that Kincaig is only considered to have capacity for 40 houses and is not considered to have capacity for medium to longer term housing. On the contrary, there are a range of suitable sites within the environs of the village which provide significant capacity for growth and expansion.

The Cairngorms National Park Local Plan Consultative Draft October 2005 proposed a range of housing sites within Kincaig on my client's land. The finalised Draft however contains only two housing sites both of which are at the extreme north end of the village

outwith my client's land. These sites (H1 and H2) both have considerable shortcomings as housing sites particularly given the existence of good alternative sites elsewhere.

In summary, both sites are at the extreme north end of the village. Their development will further elongate the settlement pattern and create ribbon development. Site H1 has drainage issues which could also make it unsuitable, particularly in comparison to other better alternative sites. Site H2 has access issues which could make it difficult to develop. There are better alternative sites within the village as marked on the plan attached.

These alternative sites will consolidate the village core around the war memorial and land to the north west of the memorial already used informally as a sports pitch. This will create a more nucleated settlement reinforcing the T junction unto the B9152 and the war memorial as the centre and focal point of the village. These sites have no access or drainage issues and their development will open opportunities for the future provision of community facilities on the west side of the road. The sites are a logical infill development between the A9 and the B9152. The inclusion of a buffer zone will enhance the amenity of the village as a whole by blocking views and noise from the A9.

Site H1

H1 is a generally low lying site, sitting beneath the main road through the village, with a deep low lying area at its centre which is wet and boggy. The Local Plan states that this wetland should be incorporated into a Sustainable Urban Drainage System for the housing site. However, the boggy and low lying nature of the site would indicate potential problems with drainage. Therefore the allocation of this site could be at variance with Scottish Planning Policy 7; Planning and Flooding (SPP7) which states in paragraph 15: "New development should be free from flood risk from any source". SPP7 goes on to state in paragraph 42 on Local Planning, that: "...land with drainage constraints or otherwise poorly drained and low lying coastal land should be assumed to be at risk." SPP 7 states clearly that: "New development should aim to be in harmony with the water environment and not attempt to work against it." (Paragraph 3) There are therefore questions over the wisdom of developing site H1 due to drainage issues particularly since better alternative sites exist.

Site H2

Site H2 is a difficult site with poor visibility splays creating access problems. The site, while adjacent to the primary school, is very removed from the village core and other facilities. The development of this site is inappropriate at this point given the existence of better sites within the village core.

Settlement Pattern

Site H1 and H2 is at the extreme north end of the village creating an elongated settlement pattern, ribbon development and drawing development away from the village core. The alternative sites highlighted by this objection which were included in the consultative draft of this plan but removed without reason, notification or discussion, provide the opportunity to consolidate the village core, creating a more nucleated settlement and focusing development around the existing built up area.

Housing Densities

The Local Plan suggests that 40 houses could be contained within site H1. This is too great a density for the development for this site and for the settlement pattern of the village. The adjacent site to the south of H1 is approximately the same size but without the large area of drainage problems and has been developed for 28 houses. Elsewhere in the village, development is of a low density suited to the rural character of the area.

The Alternative Sites

The alternative sites are shown on the attached map. These sites were in fact contained in the Cairngorms National Park Plan Consultative Draft but have been removed from the Finalised Draft together with sites identified for community use. My client owns an extensive area of land on the west side of the main road running through the village and bounded on the west by the A9, which offers the opportunity for land to also be made available, in conjunction with new housing sites, for community facilities. Should these sites suggested be allocated for development, consultation could be held with the community to establish the types of use most needed and a site made available accordingly. The allocation of this more extensive area of land on the west side of the road allows opportunity for the careful planning of the area to achieve the organic growth of the settlement, avoiding ribbon development and drainage issues, with the scope for provision of community facilities.

The alternative sites sit above the road and are free from concerns over drainage. It is also considered that they have good visibility splays and present no access problems. The sites are a logical infill development between the A9 and the B9152. The inclusion of a buffer zone will enhance the amenity of the village as a whole by blocking views to and noise from the A9. These alternative sites will consolidate the village core around the war memorial and land to the north west of the memorial already used informally as a sports pitch. This will create a more nucleated settlement reinforcing the T junction unto the B9152 and the war memorial as the centre and focal point of the village. In fact the Consultative Draft Plan identified a much larger number of housing sites. This was confirmed in a letter from The Park Authority on 4 November 2005 (see attached). It is not clear why these sites have been dropped in the Finalised Draft Plan together with the community use sites also identified in the Consultative Draft. My client seeks the reinstatement of these housing sites together with the site for community use as part of the planning of the housing sites to the west of the road.

Table 4

My client disagrees with the assertion on Table 4 that Kincaig only has capacity for 40 houses currently and zero capacity in the medium to longer term. On the contrary, there are clearly a range of very suitable sites with significant capacity, highlighted on the plan attached which will consolidate and round off the village, enhancing its settlement pattern and creating a greater focus to the settlement pattern.

It is noted that paragraph 7.6 states that additional sites for longer term will be identified through housing land audits and review of the Local Plan. However, the inclusion of longer term allocations would increase certainty and allow better programming of infrastructure and servicing.

Modifications to resolve these objections -

- My client seeks the allocation of housing sites and a community site on the west side of the road as set out on the plan attached.
- The densities on proposed housing sites should be reduced to a, low density development more appropriate to the area.
- Table 4 should be altered to show significant current and medium to longer term capacity within Kincaig.

Summary

The sites H1 and H2 in Kincaig should not be allocated for housing, but provision should instead be allocated on land NW of the main road. H1 allocation is too dense and would be out of character with the settlement. The site is low lying, the centre of the site being wet, indicating problems for drainage. The allocation could therefore be at variance with SPP7. Site H2 has poor visibility splays creating access problems. The site is removed from the village core and other facilities.

Table 4 indicates no medium or long term growth allocation within Kincaig whereas it is argued that there are suitable sites to allow for such growth. The alternative sites will consolidate the village core creating a more nucleated settlement. The sites have no access or drainage issues and will open opportunities for the future provision of community facilities on the west side of the road. The sites are a logical infill development between the A9 and the B9152. The inclusion of a buffer zone will enhance the amenity of the village as a whole by blocking views and noise from the A9.

These should be in line with the sites previously identified in the draft plan with a density allocation in keeping with the surrounding area. Table 4 should also be amended to indicate significant current and future capacity for growth.

CNPA analysis

The allocated sites will be analysed in light of the comments received. This analysis will be linked to the need for housing land within the area, and the SEA findings for the sites allocated within Kincaig. Having assessed these sites, a review will be undertaken of the alternative land suggested to ascertain its qualities in meeting the local housing need, and the impact it would have when assessed through the SEA. (TECHNICAL ADVICE REQUIRED FROM NATURAL HERITAGE SECTION AND HIGHLAND COUNCIL ROADS DEPT).

Policy Housing (additional land suggestion)

Name The Clouds Partnership
Agent Sinead Lynch

Company The Clouds Partnership **Objector Ref** 398

Representation

Introduction

1.1 This is a written submission prepared by Strutt & Parker on behalf of The Clouds Partnership, who are the owners of the subject site at Kinakyle, Aviemore.

1.2 This written submission addresses the policy designations as contained in the Deposit Version of the Cairngorm National Park Local Plan, which have an impact on the land in his ownership, and proposes a number of changes to the Local Plan in relation to the settlement of Aviemore generally, and particularly to the subject site at Kinakyle.

1.3 Policies which are the subject of this written submission are as follows:

- Section 5 Living and Working in the Park, the housing land requirement and supply
- Table 4, Section 5
- Section 7 Settlement Proposals, strategic settlements, Aviemore

- Section 7 Settlement Proposals, strategic settlements, An Camus Mor

The Site

2.1 Kinakyle is located on the southern boundary of the settlement of Aviemore. The northern boundary of the site abuts the southern boundary of the settlement of Aviemore as identified in both the Adopted and Emerging Local Plans.

2.2 Kinakyle is currently used for agricultural purposes, and is generally devoid of prominent landscape features.

2.3 Kinakyle is approximately 60 hectares in total area, and subject to the flood map as produced by SEPA, the area available for residential and associated development is approximately twenty hectares.

Cairngorms National Park Plan 2007

3.1 The Cairngorms National Park Plan 2007 contains at Section 5.2.4 Strategic Objective relating to the provision of housing in the Park. The Park Plan Strategic Objectives for housing which are applicable to this submission are 5.2.4a - increase the accessibility of rented and owned housing to meet the needs of communities throughout the Park, and 5.2.4d - ensure there is effective land and investment for market and affordable housing to meet the economic and social needs of communities throughout the Park.

National Planning Policy and Guidance

4.1 As set out in the original submission to the Cairngorms National park Local Plan Consultation Draft October 2005 on behalf of The Clouds Partnership, we would reiterate the provisions of SPP3 — Planning for Housing (February 2003) which requires Local Plans to contain a five year supply of effective housing land. SPP3 also provides for the provision of sustainable settlement strategies, through the provision of certainty and variety for both developers and the local community.

4.2 SPP15 — Planning for Rural Development (February 2005). The provisions of SPP15 apply to Aviemore in that it is a smaller settlement in a rural context. SPP15 identifies the scope for considerable small scale rural housing development, to be expressed in development plans either as part of settlement policies or separate subsets on rural housing policy.

4.3 There are numerous planning advice notes prepared by the Scottish Government which relate to the provision of housing in small towns and to the housing quality in general.

The Cairngorms National Park Deposit Local Plan 2007

5.1 The Clouds Partnership supports the removal of the general policies from the Cairngorms National Park Deposit Local Plan, and the revision of the topic policies.

5.2 Policy 1 — Development in the Cairngorms National Park. As set out in our original submission, The Clouds Partnership would maintain an objection to Policy 1 in that Section B “any significant adverse effects and equal/ties for which the Park has been designated are clearly outweighed by social and economic benefits of national importance and will be mitigated at the satisfaction of the Planning Authority by the enhancement qualities of features of equal importance to the National Park”.

Comment - The Clouds Partnership would maintain its objection to Policy 1 — Development in the Cairngorms National Park, on the basis that quantification of “significant adverse effects” needs to be quantified. It remains an open ended statement of policy intent which could have an impact on every planning proposal made in the National Park and therefore clarity is required in terms of its application.

5.3 Policy 13— Water resources

Comments were made by The Clouds Partnership to former Policies 13 and 14 of the consultation version of the Cairngorms National Park Local Plan, and we would support particularly Policy 1 3b, where development in areas susceptible to flooding will require developer funded flood risk assessment.

5.4 In relation to Section 5 Living and Working in the Park, The Clouds Partnership generally supports Policy 17 - Sustainable Development, Policy 18 - Design Standards for New Development and Policy 19— Developer Contributions.

5.5 Table 4 - Phased Land Supply by Local Authority Area

The Clouds Partnership would object to Table 4 Phased Land Supply by Local Authority Area, particularly in relation to the proposed land supply for Aviemore, as the proposed land supply is not in accordance with the Adopted Cairngorms National Park Plan which encourages the proactive growth of the mains settlements including Aviemore, and for the provision of land for housing growth to meet the social and economic needs of other settlements and communities.

5.5.1 The 0 to 5 year target numbers of units for Aviemore in the Deposit Local Plan is 250. The indicative 5 to 10 year target numbers of units in the Deposit Local Plan for Aviemore is 50, and the identified capacity for medium to long term numbers of housing units is 0.

5.5.2 Therefore, in Aviemore, the Deposit Local Plan does not accord with SPPI in that it does not secure an ongoing five year land supply in Aviemore during the lifetime of the Local Plan.

5.6 Policy 24— Contributions to Affordable Housing

The Clouds Partnership objects to Policy 24, in particular to the requirement for the developer to provide all of the affordable housing on a site with target of 30%. The Scottish Executive produced Planning Advice Note 74: Affordable housing in March 2005 and at Section 34 it specifically addresses the nature of the affordable housing contribution. The maximum benchmark figure identified in PAN 74 is that each site should contribute a maximum of 25% of the total number of units as affordable housing. The Plan continues at section 35 to state that "the Local Authority may also seek a higher percentage on a specific site but this will only be appropriate in exceptional circumstances, for example linked to a substantial lease of Green field land or on a site owned by the Local Authority or another public agency which is being released for development' The Deposit Version of the Cairngorms National Park Local Plan does not contain any policy justification for the variation to PAN 74. The Clouds Partnership would submit that Policy 24 should reflect national planning policy, and require a maximum provision of 25% of on-site affordable housing provision.

Settlement Proposals

6.1 The Clouds Partnership wish to strongly object to the proposed alteration to the identified settlement boundary for the Strategic Settlement at Aviemore. The Deposit Local Plan proposes a change to the settlement boundary for Aviemore, moving the previously identified boundary northwards to the north of the B970 and the Speyside Leisure Park. The southern boundary of Aviemore had previously been identified as lying on the southern extremity of the Speyside Leisure Park and to the east of the B9152. The Clouds Partnership request that the settlement boundary of Aviemore be reinstated to that set out in the consultation version of the Cairngorm National Park Local Plan.

6.2 The Clouds Partnership wish to object to the following proposals as set out in Section 7 Strategic Settlements, Aviemore of the Cairngorm National Park Deposit Local Plan.

- Site ABIH1 - This site lies within the SEPA Flood Risk Area, and although the site already has Outline Planning Consent for 120 dwellings this housing allocation should not be considered wholly effective for the five year plan period.

- Site ABIH2 -This site lies partially within the identified SEPA Flood Risk Area. It has an identified Local Plan capacity for approximately 10 dwellings, and cannot be considered wholly effective in the five year plan period.
- Site AV/H3 - This site has an identified Local Plan capacity for approximately 70 dwellings. Part of the site lies within the SEPA Flood Risk Area, and therefore cannot be considered wholly effective during the plan period.

Comment

6.2.1 The Local Plan has identified a five year target of 250 housing units. Table 4 in the Local Plan has identified that there are approximately 220 units with consent but not yet built in Aviemore, and an indicative capacity of 80 units on sites identified in the Local Plan, giving a total capacity of 300 units in Aviemore. However, as each of the sites with either consent or indicative capacity is subject to Flood Risk Analysis, none of them can be considered wholly effective. On that basis, and in order to provide an ongoing five year supply of housing land during the lifetime of the Local Plan further housing sites should be identified in, or adjacent, to the strategic settlement of Aviemore.

6.2.2 On the basis that each and every site with either planning consent or capacity for residential development in Aviemore is subject to the SEPA Flood Risk Area and detailed flood risk assessments will be required. It would be prudent to assume that not every one of the 300 housing units identified will be delivered during the 0 to 5 year period. Additional housing land could, and should be identified to ensure that effective sites are available to provide the required housing units in the 0 to 5 year plan period.

6.2.3 The Clouds Partnership would submit that land at Kinakyle is available and effective with a 0 to 5 year plan period requirement, and thus the subject site at Kinakyle could and should be identified as an effective housing site in the Deposit Local Plan. Although itself subject to the SEPA Indicative Flood Risk Area, there is approximately 20 hectares of flat accessible land available for residential and associated development. Land at Kinakyle is capable of being an integral part of the town of Aviemore as opposed to a separate village and is less sensitive in terms of visual impact.

6.2.4 Kinakyle immediately adjoins an existing built element of Aviemore town despite the proposed change to the settlement boundaries set out in the Deposit Local Plan and thus is a logical extension to the existing built form of the town of Aviemore.

Settlement Proposals — Strategic Settlements —An Camas Mor

6.3.1 The Deposit Version of the Cairngorms National Park Local Plan contains a proposal for a new community at An Camas Mor. An indicative settlement boundary is identified for this site with an expectation that up to 1,500 homes could be developed over time. The Local Plan identifies a need for development to begin at An Camas Mor within the 0 — 5 year period of the Local Plan, and assumes that 100 homes will be provided within the next 5 years.

6.3.2 An Camas Mor (previously Cambusmore) was identified in the Badenoch and Strathspey Local Plan 1997 and the Highland Structure Plan 2001. Despite those allocations, An Camas Mor has not provided any housing units over the past ten years. The major infrastructure required to facilitate development at An Camas Mor will require major research prior to submission of any planning application. On that basis, The Clouds Partnership would question the ability of An Camas Mor to provide any effective housing numbers during the 0 to 5 year plan period and would therefore question its effectiveness in terms of housing allocations.

6.3.3 Table 4 of the Deposit Version of the Local Plan does not provide for any housing unit provision in Aviemore beyond the ten year indicative target, with all capacity for Aviemore apparently being accommodated at An Camas Mor. Whilst An Camas Mor could be a sustainable and viable new settlement, it cannot and should not accommodate all housing options in the Aviemore housing market

area.

6.3.4 SPP3 — Planning for housing clearly states that a choice of residential environment is desirable. The Clouds Partnership would object to the over-reliance on An Camas Mor for the provision of all housing numbers in the Aviemore area.

Conclusion

7.1 The Clouds Partnership continue to object to the over-reliance of the Cairngorms National Park Deposit Local Plan on An Camas Mor for the provision of housing numbers at Aviemore, and would urge the Cairngorms National Park Authority to allocate land at Kinakyle, Aviemore as an effective housing site in the emerging Local Plan.

Summary

The objection relates to the land allocations and housing land supply for the Aviemore area and how this impacts on the land at Kinakyle, which is proposed as a viable alternative site for housing land provision. The key areas of concern relate to housing land requirement and supply, table 4, and settlement proposals at Aviemore and An Camus Mor. As an alternative a 60ha site south of Aviemore's settlement boundary at Kinakyle is proposed, of which 20ha would be suitable for housing development. In support of the argument proposed sections of the Park Plan highlight the need for effective land supply for market and affordable housing to meet the economic and social needs of communities throughout the Park, and also the Park Plan objective to increase the accessibility of rented and owned housing to meet the needs of communities throughout the Park.

SPP3 requires Local Plans to contain a five year supply of effective housing land, and provides for the provision of sustainable settlement strategies, through the provision of certainty and variety for both developers and the local community. SPP15 apply to Aviemore since it is a smaller settlement in a rural context. SPP15 identifies the scope for considerable small scale rural housing development, to be expressed in development plans either as part of settlement policies or separate subsets on rural housing policy. Many PANs also exist relating to the provision of housing in small towns and housing quality in general.

In regard to the Local Plan policies, an objection to Policy 1 is maintained. As set out in our original submission, The Clouds Partnership would maintain an objection to Policy 1 (b) since "significant adverse effects" needs to be quantified. The open ended nature of the statement could have an impact on every planning proposal made in the National Park and clarity is therefore needed. Support policies 17, 18 and 19. In relation to Policy 13, support the requirement for development funded flood risk assessments.

The housing land supply proposed in Table 4 is not in accordable with the Park Plan which encourages proactive growth in the main settlements including Aviemore, and for the provision of land for housing growth to meet the social and economic needs of other settlements and communities.

Housing

Table 4 allows for 0- 5 year target for Aviemore as 250. The 5-10 year target is 50, and the identified capacity for medium-long term development is 0. This does not accord with SPP1 as it does not secure a 5 year land supply in Aviemore during the lifetime of the Plan. The requirements of Policy 24 are flawed. PAN 74 gives an indicative guide of 25% and higher % should only be sought in exceptional circumstances. The policy as given does not give any justification for the variation from this standard. The policy should be amended to

require a maximum of 25% on-site affordable housing provision.

The settlement boundary of Aviemore should not be altered as in the Deposit Plan, but should reflect that of the Consultation Draft Plan Settlement Proposals as lying on the southern extremity of the Speyside Leisure Park and to the east of the B9152.

In terms of the proposals for Aviemore:

H1 – the site lies within the SEPA Flood Risk Area, and although already granted outline permission for 120 houses, this allocation should not be considered wholly effective for the 5 year plan period.

H2 – the site is partially within the SEPA Flood Risk Area with an identified capacity for approximately 10 dwellings, and cannot be considered wholly effective in the 5 year plan period.

H3 – the site has an approximate capacity of 70 dwellings, and part of the site lies within the SEPA Flood Risk Area, and therefore cannot be considered wholly effective during the plan period.

Each of the sites allocated is therefore Comment subject to Flood Risk Analysis, and none can be considered wholly effective, and where development does occur, not all the potentially identified 300 units will be possible. On that basis, and in order to provide an ongoing five year supply of housing land during the lifetime of the Local Plan further housing sites should be identified in, or adjacent, to the strategic settlement of Aviemore.

Land at Kinakyle is available and effective with a 0 to 5 year plan period requirement, and thus could and should be identified as an effective housing site in the Deposit Plan. Although itself subject to the SEPA Indicative Flood Risk Area, there is approximately 20 hectares of flat accessible land available for residential and associated development. Adjoining the settlement, the site is capable of being an integral part of Aviemore as opposed to a separate village, is a logical extension to the village and is less sensitive in terms of visual impact.

The new community allocation at An Camas Mor assumes within the 0- 5 year period of the Local Plan that 100 homes will be provided. Despite being allocated within adopted development plans since 1997 and 2001, no houses have yet been provided. The major infrastructure required to facilitate this development will require major research prior to submission of any planning application. On that basis it is argued that the allocation will not be effective for the 0-5 year plan period. This site is also to provide all long term housing provision for Aviemore and An Camus Mor. Whilst An Camas Mor could be a sustainable and viable new settlement, it cannot and should not accommodate all housing options in the Aviemore housing market area. SPP3 states that a choice of residential environment is desirable. There is therefore an over-reliance on An Camas Mor for the provision of all housing numbers in the Aviemore area.

The local plan should therefore allocate land at Kinakyle as an effective housing site.

CNPA analysis

The allocated sites within Aviemore will be analysed in light of the comments received. This analysis will be linked to the need for housing land within the area, and the effectiveness of the sites included in the deposit plan. The sites will also be judged against the SEA findings, the physical constraints of these sites and the requirements for effectiveness as set out in national guidance. Having assessed these sites, a review will be undertaken of the alternative land suggested to ascertain its qualities in meeting the local housing need, and the

impact it would have when assessed through the SEA. (TECHNICAL ADVICE REQUIRED FROM NATURAL HERITAGE SECTION AND HIGHLAND COUNCIL ROADS DEPT).

Policy Housing (additional land suggestion)

Name Hamish Jack

Company

Objector Ref 440

Representation

The recent and well attended discussion group chaired by Professor Shucksmith and Fergus Ewing NP raised many points of interest and offered suggestions of value as to how we can all contribute to the further success of our National Park development. I attended, on behalf of my group, the Spey Valley Crofters Association, and have subsequently furthered our interest with other group representatives. I was able to take the moment to show our speakers my own small croft and the contribution I believe it could make in this endeavour. My Croft:

This is of nine acres holding a spread of Birch and Pine plus a great deal of heather and gorse. The croft is geographically on the southern limit of Nethy Bridge sited beyond the group of dwellings known as Cotterton Beg, Monduie, Squirrel Cottage, Tall Pines and set back on the lane/track that leads to An Tealack and on to the Ranch House, the track leads off from the B970. I am minded to make the croft, or part, as permitted under your master plan for the area, available for development of affordable housing units responding to the cultural needs noted in National Park publication plan 2007. My thoughts go beyond the building of these dwellings but to create a model of what can be a style for the future of other similar sites within our Park - the opportunities within the 3800 km area are obviously there. I offer a brief outline of the possible development and trust you will be encouraged to grant me an interview — at a time and place of your choosing, when such a project can be further discussed. The influence I bring to bear is as the result of such historical creations as that by Architect Clough Williams—Ellis circa 1920, at the now world famous visitor attraction of: Port Merrion, N..Wales and created on previous scrubland.

Other examples have impressed me as for instance: The Frys Factory, Sommerdale near Bath; The Bournville Village by Cadbury, Birmingham; The Taylor Mills at Bradford, and the Mill at Coatbridge, all inspired housing creations in landscaped settings.

It is my conviction, with all the feeling one developers from the four hundred year history of my family, farming, foresting and crofting in the Spey Valley, that the opportunity is there for us to grasp that will both serve a desperate need for the first time home hungry buyers who search for a rung on a ladder that all too often, is not there, and to serve the ever growing tourist interests fast becoming our first industry. In order to get such a project off the ground I propose making any dwelling plots available at a price of circa £30,000.00 this level will counter the impossible for the young workers house prices that over the decade have plused with never matching inflation on the wage market.

The dwellings too while being sound, attractive and desirable will use the latest materials viz insulation and materials and would call on co-operation from University Building faculty as did the notable Milton Keynes 'green' housing developments by the 'corporation' as constructor and University of London as designers. The result being homes that cost no more than £50 per year in heating costs and use recycled waste in various beneficial ways. This clever development is now in its 25th year and is an outstanding example of materiel use

and technology with heat exchange units and the like. There have been many subsequent benefits and material developments.

I hope Sir, that you feel we have the nub of an idea worthy of pursuing regarding planning needs and that you can find a slot in your diary to meet with me.

Summary

Additional land offered for affordable housing development on land south of Nethy Bridge. The concept of a new settlement is given to explain the underlying design concept to the site.

CNPA analysis

The need for additional land for housing will be assessed, and the land suggested considered in line with the current allocations and the SEA. The opportunities for smaller scale development within the site will also be assessed. (TECHNICAL ADVICE REQUIRED FROM NATURAL HERITAGE SECTION)

Policy Housing (affordable)	Name Donald Lockhart	Company Albyn Housing Association	Objector Ref 385c
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Representation

Again, the Society commends the boldness of the 50% quota (Policy 24) but would be concerned about whether this would deter developers in bringing forward development proposals. A preferred route might be to consider this on a case by case basis depending on the level of housing stress in the area. Some sites may merit a greater quota than the 50% stated.

Summary

While supporting the boldness of the 50% quota Albyn are concerned that this may deter developers from bringing forward development proposals. A case by case consideration depending on the level of housing stress in the area might be preferable. Some sites may merit a greater quota than the 50% stated.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable)	Name Planning, Environment and Development	Company The Highland Council	Objector Ref 469g
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Representation

There are two aspects to policy. First, the extent of private sector contributions is placed at 50% where agency subsidy is available, and at 30% where it is not available, for schemes of 2 or more houses. Second, that the composition of new dwellings in future should deliver

75% 2-3 bed properties. Affordable housing within the National Park will contribute towards the Administration Programme targets.

This is a bold response to the need for affordable homes within the Park and recognition of the need for initiatives to assist first-time buyers and the Council's objectives for increasing the proportion of smaller homes, but it is not certain to deliver more units than is the case under the existing regime. The Council made very substantial representations indeed in respect of earlier proposals founded on the occupancy principle that new homes would be accessible only to residents working within the Park. Whilst that strategic approach has been substantially recast, particular issues raised by the Council remain outstanding:

- first, the Park Authority's policy risks creating a two-tier regime; the affordable housing contribution within the Park being greater than a minimum 25% commitment sought outwith it, by the Council. In the context of competitive market opportunities and growth prospects in Inverness/Nairn, the A96 Corridor and Inner Moray Firth sub-region, a 50% requirement may disadvantage developers, landowners and the housing agencies such that affordable house-building at the rate envisaged would depend on increased levels of subsidy from the public sector. PAN 74 Affordable Housing allows variable contributions within an area as an exception and advises sensitivity to differing levels of need. This would not deter a higher affordable housing requirement in selected locations, and of course this is consistent with the Council's approach in Aviemore, given the particularly acute circumstances there; and

- second, if the market recognizes the specified proportion of house-types sought by the Park Authority, it will build them. If it does not, then intervention along the lines proposed may slow the delivery of these and other homes, including affordable units. Notwithstanding, the Council's expectation that affordable housing will be integrated with other homes, at densities which vary with the composition of schemes and of compatible architectural merit and design/construction quality, should be acknowledged in policy.

In respect of both of these points, the Park Authority's commitment to monitor the effectiveness of policy (and presumably to consider relaxing if it does not deliver) could offer hope to those unwilling to activate land or invest, in the expectation that circumstances may change. This is of particular concern to colleagues in the Housing and Property Service. For the moment it is recommended the Council awaits a market response on these issues, but that it expresses a desire to be involved in further discussion in the event this is needed.

Under Housing Issues in the National Park (paras 5.27-57, pages 41-48), Housing and Property Service colleagues raise issues where the phrasing of the Plan or the "terms of reference" underpinning policy, require clarification. In summary:

- para. 5.35 makes unsubstantiated general remarks about funding subsidy and the composition of social housing;
- para. 5.49 contains too narrow a definition of affordable housing, and sub-sections (i) and (iv) should respect the Council's role as strategic housing provider;
- para 5.52 which relates to the expected mix of tenures of affordable housing, should be compatible with the Council's strategy;
- para. 5.53 - again in relation to the tenure mix - appears not to sit entirely comfortably with policy 24 (Contributions to Affordable Housing); and
- para. 5.56 justifies a fuller explanation of the purpose of Section 75 Agreements.

Finally, colleagues believe the essence of the Park Authority's objectives (para. 5.57) are that the National Park Authority "will work with housing providers" to ensure allocations policies are responsive to the needs of the Park and that that should be reflected in the Plan.

Summary

The levels of affordable housing and the balance of house sizes proposed is a bold response to the problem but there is insufficient

evidence to support the argument that this approach will deliver an appropriate number of houses. The approach risks creating a two tier regime of affordable and other forms of housing, and may place developers within the Park at a disadvantage. Closer reference should be made to the provisions of PAN 74 to provide variable contributions where exceptional circumstances exist. The balance of houses types sought would be provided by the market if the demand existed. If this does not exist, it may result in a slowing of all houses delivered. It is considered that if this policy continues, it should contain reference to the need to integrate affordable houses within the overall scheme. The reference to monitoring these policies is also of concern as it may indicate flexibility to the advantage of developers.

In terms of the wording of the supporting text, there is need for additional clarity and definition throughout the housing section, to ensure that all those involved in housing delivery are clear on what is expected as a result of the policies. Particular mention is made to para 5.35, 5.49, 5.52, 5.53, 5.56. The wording of the objectives on delivery should also be clarified to reflect the fact that the CNPA will work with housing providers to ensure an allocations policy that is responsive to need.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable) **Name** Housing and Property Services **Company** The Highland Council **Objector Ref** 471b

Representation

Para 5.35: "First, the Park is unlikely to attract enough public funding to build the numbers of houses required by those communities. Second, many of the communities require a wider range of housing options than conventional social housing provides, with a greater emphasis on housing those in need locally."

There is no evidence for either of these statements and neither would we, as partners, agree with them. Neither do they justify use of the affordable housing policy and may lead developers to challenge the application of the policy. We would ask that they are removed

Summary

Seek the removal of the statements made in 2nd and 3rd sentences in para 5.35. States there is no evidence for either statement, and also that they do not justify the use of the affordable housing policy and therefore may lead to developers challenging the policy.

CNPA analysis

Clarification of the wording highlighted will be included. Without sufficient justification the wording will be amended.

Policy Housing (affordable)

Name Mairi Maciver

Company Communities Scotland

Objector Ref 025o

Representation

21. Para 5.59 - re contribution towards affordable housing from single house developments, has consideration been given to the possible effects on affordability for those individuals developing their own home who do not require grant, but have limited means?

Summary

In Para 5.59 has consideration been given to the possible effects on affordability for those building their own home who do not require grant aid, but have limited means.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. This will include the approach taken for individual houses. Further clarification is also needed to ensure housing delivered meets the needs of local people. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable)

Name Donald Lockhart

Company

Albyn Housing Association **Objector Ref**

385a

Representation

I refer to the above Deposit Draft and may I thank you for ensuring that the views of affordable housing providers such as Albyn Housing Society Ltd have been specifically sought and that regular opportunities have been provided for the Society to contribute to the CPNA Local Plan process. Please forgive me for not utilising the form provided in the document for specific comment.

As you know Albyn Housing Society is the Registered Social Landlord (RSL) with the biggest interest in the Badenoch and Strathspey portion of the Park and I was delighted recently to be able to demonstrate the reality of RSL provision, specifically our Aviemore North development, to the Park board showing how as an RSL we can meet so many of the Park's objectives in terms of sustainability, affordable housing in perpetuity and providing for a range of needs in a socially balanced and appropriate way. I commend the Draft for its bold and ambitious stance on the provision of affordable housing and I would plead for increased dialogue in matters of detail such as how the Common Housing Register will operate; how RSL's deal with home ownership applications; the exigencies of the 2001 Housing Act as they bear upon RSL's particularly and how the affordable element is to remain deliverable given these ambitious policy statements.

Having read the Highland Council's comments on the Draft as contained in the report to the 26 September Planning, Environment and Development Committee, I cannot do better than endorse the broad sweep of their comments on the elements of the Plan which relate to the strategic context. In my comments on the earlier draft I commented that "the lack of forecasts of growth in household numbers and population change or economic activity is a serious weakness of the Plan. Realistic assessments require to be built in for the current acute housing need from within the Park to say nothing of the role the Park should play in contributing to the wished-for

population growth in the Highlands promoted by the Scottish Executive and the Enterprise network towards achieving the ultimate goal of promoting sustainable communities and a competitive economy where a healthy balance of young, economically active people and the increasingly ageing population is a legitimate aim." I would infer that the Council remain unconvinced that this deficiency has been fundamentally rectified and I concur with this view.

Again, referring to my earlier representation, the tone of the Deposit Draft to anyone interested in seeing a Park which retains its people, promotes their ability to make successful, productive lives and encourages new people to live there is insufficiently development-friendly. It continues to speak to the reader as a shopping list of why development cannot occur rather than a positive statement of what advantages development can bring. Equally it fails to provide reassurance that the voice of the objector is not the loudest one in the development jungle. In addition there requires to be more reference not just to people and communities within the Park but also to those who want to come and live and work in the Park.

Summary

In general terms, Albyn Housing Association would seek further clarification on how the Common Housing Register will operate; how RSL's deal with home ownership applications; the exigencies of the 2001 Housing Act as they bear upon RSL's particularly and how the affordable element is to remain deliverable given these ambitious policy statements. Albyn support the views of Highland Council regarding strategic context, however previous comments made regarding household and population numbers and projections remain true. The tone of the document remains negative and does not adequately explain the development process and the weight given to all aspects of it.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable)	Name William Stuart Paterson	Company	Objector Ref 409j
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Representation

Community councils have been asked to identify land for 'affordable houses', but after a recent development of 17 houses in Nethy Bridge where only 3 residents managed to upgrade to larger homes I would suggest that this is a flawed policy. It appears that these homes can be given to people within a wider area, who then require to travel increased distances therefore increasing the carbon footprint of the area.

Summary

Affordable houses in the area should be for local people who do not have to travel long distances to work.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable)

Name James and Evelyn Sunley

Company

Objector Ref 056o

Representation

5.57 We are certain that the response the Park received during the Park Plan public consultation exercises; highlighted that the eligibility criteria for affordable housing and social rented housing, to be taken from Local Authority and housing associations housing waiting lists, do not meet the needs of the local people who require affordable housing and have caused considerable anger in the community previously. Means of overcoming the housing allocation policy must be found to help those local people and for incoming essential workers in the National Park in need of affordable housing but whose circumstances do not give them sufficient points to be allocated a house from the national waiting lists.

Summary

The housing allocation policy must ensure that housing is for local people and essential workers and not for people from national waiting lists.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable)

Name Mairi Maciver

Company Communities Scotland

Objector Ref

025m

Representation

19. Para 5.49, first sentence - suggest use of PAN 74 definition of affordable housing ("housing of a reasonable quality that is affordable to people on modest incomes") and deletion of "in perpetuity", given that Right To Buy means affordable rent is not always in perpetuity. The 'in perpetuity' issue can be addressed in a separate para. We also suggest that shared ownership is included as one of the housing options listed.

Summary

In Para 5.49 suggest using PAN 74 definition of affordable housing ("housing of a reasonable quality that is affordable to people on

modest incomes")

CNPA analysis

Cross referencing of the definition in PAN 74 will be made and amendments to clarify will be included. The approach taken in para 5.49 however seeks to ensure the widest definition of the term, and the reasoning behind this approach will be included within para 5.49 for clarity.

Policy Housing (affordable)

Name Inverburn Ltd

Company Inverburn Ltd

Objector Ref

408b

Agent Mark Myles

Representation

In addition to the specifics of Nethy Bridge, my clients seek recognition of the need for flexibility of land use within existing community areas and adjacent hinterland in order to meet the well documented aspiration of delivering affordable housing for the area. Particular emphasis should be placed on highly sustainable, environmentally friendly developments which compliment the ethos of CNPA and community integration whilst meeting identified need. It is anticipated, that such flexibility be afforded only to schemes which provide circa 75% social housing.

I would welcome the opportunity of discussing these representations with you further prior to the preparation of any modifications to the deposit local plan.

Summary

There needs to be a degree of flexibility in land use allocations within existing community areas and adjacent hinterland in order to meet the affordable housing aspirations for the area. Emphasis should be placed on highly sustainable, environmentally friendly developments complimenting the community and meeting local need. Such flexibility should be afforded only to schemes which provide circa 75% social housing.

CNPA analysis

The approach taken to land outwith allocated sites will be reviewed as a result of this consultation process. This review will be undertaken in conjunction with ongoing work on the efforts to improve sustainability within the Park. With particular reference to affordable housing, further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Representation

General – we would suggest that the affordable housing problem is a pre-existing issue that should not be the basis for a local plan policy that seeks unreasonable levels of affordable housing. The affordable housing policy must include a percentage figure that is appropriate to the area and is fully justified by an up to date housing needs assessment.

Rather than introducing an unrealistically high affordable housing requirement this local plan policy should consider the alternative means that the planning system can use to contribute to the delivery of Affordable Housing. PAN 74 paragraph 21 supports the increased delivery of Affordable Housing by:

- Making surplus local authority land available for affordable housing at less than full market value;
- Working with third parties to assemble sites for affordable housing, including other public agencies (such as the forestry commission)
- Opting to increase council tax on second homes by 50% to 90%, raising revenue which can be used to increase the supply of affordable housing within the housing market area;
- Using compulsory purchase powers.

Summary

The affordable housing problem is a pre-existing issue that should not be the basis for a local plan policy that seeks unreasonable levels of affordable housing. The affordable housing policy must include a percentage figure that is appropriate to the area and is fully justified by an up to date housing needs assessment.

The policy should therefore consider the alternative means that the planning system can use to contribute to the delivery of Affordable Housing in line with PAN 74 para 21 which supports:

- Making surplus local authority land available for affordable housing at less than full market value;
- Working with 3rd parties to assemble sites for affordable housing, including other public agencies (such as the forestry commission)
- Opting to increase council tax on second homes by 50% to 90%, raising revenue which can be used to increase the supply of affordable housing within the housing market area;
- Using compulsory purchase powers.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable) **Name** Mairi Maciver **Company** Communities Scotland **Objector Ref** 025n

Representation

20. Para 5.57, first sentence - clarification is required on the meaning of "applicants" - does it refer to planning applicants, applicants to Council and Registered Social Landlord properties and/or purchasers of new private sector housing?

Summary

In Para 5.57 'applicants' should be defined to clarify to whom it refers.

CNPA analysis

Additional explanation will be added for clarity.

Policy Housing (affordable) **Name** Stuart Robertson **Company** Aberdeenshire Council **Objector Ref** 474a

Representation

A consistent approach across all Council Areas within the Park is desirable for the industry and the delivery of infrastructure to all areas of the National Park.

Policy: Affordable Housing:- actions affecting delivery of Affordable Housing:

Land: Land allocation could be doubled or thereby but still restricted to the numbers of units required. Thereby inducing a market in the land and so holding down land values. This will also allow a range of house types and sizes to be prescribed through outline development briefs for the allocated sites – with sufficient flexibility either in policy or by review to take account of changing housing requirements- leading to the provision by industry of a broad range of open market prices to satisfy all those who wish to enter the market. The rented sector being addressed by public subsidy or the private sector through other provision mechanisms.

Key and transient workers: Tourism related and public service related employment.

Allow public sector employers and tourism related employers to build or convert buildings on their sites for rented accommodation.

Numbers would be small eg: for young teachers perhaps 2 units would be required but this would still ease the burden on the mainstream social rented or low cost sector and allow premises to be available for staff should the person change employment. RSLs may be approached to manage these units on the owners' behalf. (An RSL has been approached on this issue with a favourable response)

Summary

Seeks a consistent approach across all Council areas within the Park is desirable for the industry and for infrastructure provision.

Suggest doubling land allocation, but keeping same number of units required in order to help hold down land values.

Suggest allowing public sector employers and tourism related employers to build or convert buildings on their sites for rented accommodation. These units could then be managed by RSLs.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will

deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable) **Name** Robert Maund **Company** Scottish Council for National Parks **Objector Ref** 434j

Representation

Housing

There is now over 50 years' experience of trying to address the problems of affordability and meeting local needs in National Parks in England and Wales. Some of these Parks have very severe problems because they are accessible to large centres of population and the pressure for house building is that much greater.

Generally speaking, after trying many types of regulation, several have adopted a range of measures involving occupancy requirements, work requirements, affordability regimes with overwhelming priority to assessed local need ahead of any new build open market development. Residents or applicants for new properties are required to enter into a legally binding residency deed with the aim of securing the affordability into the future. Some Park Authorities are reducing new build open market land allocations to nominal proportions usually involving change of use of historic buildings which are being converted from industrial to residential. This concession has been seen as the only way of saving the buildings.

Whilst we are sure that a lot of work has gone into the figures for housing requirements given in the plan, it would have been more useful if there had been a clearer justification for the figures rather than "A 50 per cent allowance for second homes and vacant property" and a "15 per cent allowance for uncertainty". It would have been beneficial to have the information on housing market areas, inward and outward migration and where people live and work.

Policy 24, whilst worthy in its intentions, seems to smack of wishful thinking rather than a real effort to tackle the problem. If it hasn't already been done, we would urge the Authority to have detailed discussions with appropriate National Park Authorities in England and Wales who have been through a long and painful process before arriving at their current policies. The Peak Park and the Lake District NPs are probably furthest forward on this issue. Also some of the Local Planning Authorities adjoining the Lake District NP have had to address the problem and have adopted robust policies to meet local needs. The Final Report on Cairngorms Housing System Analysis of February 2006, indicates that all the current completions projected through the planning system might require to be for affordable housing. We doubt whether the policies put forward in the plan can hope to meet such an aim.

Summary

The background section should include clearer justification for the figures and percentages proposed, and detailed in table 2. It would have been beneficial to have the information on housing market areas, inward and outward migration and where people live and work.

Policy 24 seems to be a bit wishful thinking rather than a real effort to tackle the problem. Lessons might be learned from discussions with national park authorities in England and Wales. The Final Report on Cairngorms Housing System Analysis of February 2006, indicates that

all the current completions projected through the planning system might require to be for affordable housing. We doubt whether the policies in the Plan can hope to meet such an aim.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable)	Name George Alder	Company Laggan Community Association	Objector Ref	392c
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Representation

More clarity is needed about how provision of affordable housing is to be protected and made a priority. (With reference to Point 3, we are very keen to see more affordable housing in Laggan. However, we see a possible conflict between a developer's concern for economies of scale, and our local environmental concern expressed in Point 2.)

Summary

Clarity needed on how to protect affordable housing for the future, and how to make its provision a priority.

CNPA analysis

A clear definition on the methods whereby affordable houses can be retained as such will be included for clarity.

Policy Housing (affordable)	Name Peter Crane	Company	Objector Ref	346a
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Representation

General Comments - I support the need for affordable housing and that 50% of new development should be affordable houses or a contribution toward affordable housing should be made by developers of individual houses, I would support this proposal being implemented on existing developments that only have outline planning permission.

Summary

Support the policy regarding affordable housing provision, the proposals for housing in the countryside and the contribution new development makes to the Park.

CNPA analysis

No modification considered necessary as a result of this representation

Policy Housing (affordable)

Name RG and CE Armstrong

Company

Objector Ref

042

Representation

I wish to make an observation rather than an objection regarding affordable housing. Whereas I appreciate the need for affordable housing it can have an adverse effect on values of adjacent properties where there is to be a mixed development. From my experience elsewhere, buyers have bought properties on new sites only to find that their neighbours are living in an affordable house. The affordable house and environs deteriorated to such an extent that the value of the neighbour's house (and others on the same site) declined dramatically. I suspect that I know the answer to the questions "What is the difference between a council house and an affordable house?" The danger being that the end result of such a policy would be to defeat the very worthy aims that the CNP is trying to achieve. A further observation that I wish to make is the question of supply and demand for housing within the CNP. From my own experience of the Strathdon area there is a dire shortage of building land for development opportunities, particularly for local (young) people. The landowners, because of current legislation, are reluctant to release small area of potential building land. Having read the CNP Deposit Local Plan, my interpretation of that is that there is nothing therein that would encourage local housing outwith the designated settlement area these two factors only compound to exacerbate the problem of providing housing, driving house prices even higher. This relates particularly to young families who otherwise would be able to utilise the existing local infrastructure of schools, shops, health centres etc.

Summary

Affordable homes should not be mixed through open market housing as this can adversely impact on the value of the latter. Also there should be a greater allocation of land within rural settlements to allow for development to meet local demand for housing.

CNPA analysis

The approach to 'pepper potting' affordable houses is one which has been tried and tested across the country for many years. However, a review of this approach will be undertaken in conjunction with affordable housing providers to ensure the approach being taken is the most appropriate for our area. (WORK WITH LOCAL AUTHORITIES, HOUSING ASSOCIATIONS AND RSL's)

Policy Housing (affordable)

Name D R MacKellar

Company

Cairngorms Chamber of Commerce **Objector Ref**

430j

Representation

Housing - It is particularly disappointing that while housing is rightly identified "as the largest area of concern in all of the Park's communities" it is a topic with very little reference with what has worked successfully in the past. Best practice of local solutions should be built upon and be encouraged. The Housing Policy as advised in the Deposit Local Plan will destroy any notional Housing Ladder. There is a real concern that the policy will encourage stigmatism, i.e. Families in 'affordable' property will only ever be able to stay in 'affordable' housing. By definition the open market housing will become artificially expensive in supporting the high percentages of 'affordable' housing within their developments. This 'one size fits all' Housing policy we believe will not work. Will Developers adopt a wait and see attitude if delivery is not being met. Sect 5.60 on page 48 may well give them the excuse to do just that! Larger developments may move forward as the national developers, housing associations and national builders absorb the resource required to meet the

morass of percentages, but who will manage the smaller locally developed schemes. Consider a “no Public subsidy” locally developed scheme, consisting of as defined in the Local plan;

30% as a minimum of affordable, of that percentage a percentage has to be affordable rented, a percentage has to be low cost ownership, a percentage has to be serviced plots.

Of this small development with no public subsidy, clarification is required on:

- Are the developers presumed to be the Landlords? There is no evidence to suggest that the local developers would want this.
- Allocation of tenants?
- Management of property?
- Management of tenants?
- Pay for the above?
- Who is responsible
- Property handed over to Housing associations? If so do they have the financial resource to:
- Purchase properties
- Manage properties on landlords behalf

Summary

There is little analysis of what has worked successfully in the past. Best practice of local solutions should be built upon and be encouraged. The policies will destroy any notional housing latter and will encourage stigmatism through its approach to ‘affordable’ housing provision. Open market housing will become artificially inflated to support the provision of affordable houses at the level proposed. Larger sites with resources sufficient to meet the affordable requirement may go ahead, but smaller locally based schemes may not as they will not have the resources to carry out a ‘no pubic subsidy’ development.

In terms of the variety of affordable provision, clarification is needed on:

- Are the developers to be Landlords? Would local developers want to?
- Allocation of tenants?
- Management of property?
- Management of tenants?
- Pay for the above?
- Who is responsible?
- do housing associations have the financial resources to support properties handed over to them?
- Purchase properties
- Manage properties on landlords’ behalf

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the

needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (affordable) **Name** Dr Sheila Sedgwick **Company** Ballater & Crathie Community Council **Objector Ref** 091k

Representation

5.7-5.41 The Park Plan has formed policy for the Park as a whole when in fact the affordable housing needs and housing development market potential are quite different in Ballater from that in other settlements in the Park. The number of affordable houses in Ballater for local people and for commercial employment needs has not been established.

5.42 – 5.60 (policy 23/24) Ballater and Crathie Community Council fails to see how any future development in Ballater can sustain 30% affordable housing. In addition, 5.52 states that between 15% to 25% of a development will be social rented housing. We are not all agreed with the principles of mixed housing development and the sustainable balance of affordable and open markets, and await fuller discussion on details. Some members considered that the Plan ignores the fact that many house purchasers, especially those buying expensive homes, will not buy property in a mixed development.

With regard to house type and house size, the Park Plan should recognise the unique housing needs in Ballater. Low cost housing is certainly needed, for young families to get on the housing ladder, but also, two bedroom single storey private development for an aging population who can no longer manage stairs and large gardens, as well as high value private housing to achieve planning gain to help pay for the low cost housing. Above all we are determined to keep the character of our beautiful village. This is what delights tourists and residents alike. It is expected that most of these desirable features will be fulfilled if the expected plans of the Prince's Foundation are put into action.

The responses The Park received during consultation exercises highlighted the fact that the edibility criteria for affordable housing and social rented housing, to be taken from Local Authority and Housing Association waiting lists does not meet the needs of local people requiring affordable housing and has caused considerable anger in the community in the past. The needs of local people and those incoming workers in the Park requiring affordable housing should be considered.

Summary

There should be greater clarity on how the housing requirement for each area has been calculated. The requirement for affordable housing mixed throughout developments will have an adverse impact on the value of open market houses. There should also be a better understanding of the size requirements within individual communities. What ever development occurs it should be in keeping with the character of the settlement, and should ensure that low cost and affordable houses are truly for local people and essential workers.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The guidance of PAN 74 will be reviewed to ensure that the most appropriate approach is taken. (WORK WITH

DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (allocations)	Name Ingram Builders Ltd	Company Ingram Builders Ltd	Objector Ref 412
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Representation

As a sub-contractor to local firm A W Laing, Grantown-on-Spey, we also have concerns regarding the above plan.

Following a meeting with Mr Ronald Laing and Mr Geoff Laing, we would formally support their theories on the above plan as per their letter to you of 26 September 2007.

We would also support the idea put forward by them that a meeting of local tradesmen would be the next logical step to protect the environment of the area and the local workforce.

Summary

The approach to housing allocations supports larger housing developments, without due regard to local small firms who employ local people.

CNPA analysis

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. The Plan cannot however retain certain sites to be developed by particular developers, and local developers must be reassured that there are appropriate opportunities to meet their aspirations for the life time of the Plan.

Policy Housing (allocations)	Name Iain Michie	Company	Objector Ref 411
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Representation

Very worried that the plan seems to back larger housing developments, how are small local firms to survive as most of our work is with smaller local builders who cannot possibly compete with the bigger firms. We have been in business for 25 years employing local people we would not survive if only the bigger firms would build as they use their own labour as opposed to local firms. We strongly object to the plan as it stands at present.

Changes being sought

We need a plan that takes into account local needs after all the park was supposed to make life better for residents which should include local businesses as well. A meeting where everyone can voice their concerns should be the first step.

Summary

The approach to housing allocations supports larger housing developments, without due regard to local small firms who employ local people.

CNPA analysis

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. The Plan cannot however retain certain sites to be developed by particular developers, and local developers must be reassured that there are appropriate opportunities to meet their aspirations for the life time of the Plan.

Policy Housing (allocations)	Name AW Laing Ltd	Company	AW Laing Ltd	Objector Ref	410
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Representation

As an employer in a fourth generation local building firm, employing 10% local staff, you must appreciate the above plan and its policies relating to housing will have major negative influences to our future existence.

The attached submission is on behalf of the following firms who strongly believe the plan in its current form is presenting a strategic direction that is counter productive and negative to the sustainability of the many smaller building related businesses who live and work in the Park.

AJ Builders, 12 Seafield Court, Grantown-on-Spey, PH26 3LE
 Brown Electrical, 53 Strathspey Drive, Grantown-on-Spey, PH26 3EY
 Findlay Binnie, Beinn Lee, Strone Road, Newtonmore, PH20 1BA
 Patrick Botos, Grantown-on-Spey
 Bryan R Cameron, 8 Cairngorm Avenue, Grantown-on-Spey
 DD Rose Joiners, Jamica, 4 Strathspey Drive, Grantownon-Spey
 GJ Paterson and Co, Haygrove, 13 Greyfriars Street, Elgin, Moray, IV30 1LF
 Glendalmond Contracts, 4/5 Newmills Road, Dalkeith, EH22 1DU
 Grampian Builders, Plot No 6, Newtonmore Industrial Estate, Newtonmore, PH20 1AR
 Mr RM Grant, Dalbeg, Grantown-on-Spey, PH26 3PR
 Mr C Gray, 19 MacGregor Avenue, Grantown-on-Spey, PH26 3ET
 J&J Gunn, Cairnview, South West High Street, Grantown-on-

Spey, PH26 3QH
 K Ingram, Builder, Quarry Ridge, Dallas, Moray, IV36 0RW
 Dai Lovatt, 11 Chapel Road, Grantown-on-Spey, PH26 3EP
 Ian MacLean Contracting, Drmondii, Mossie Road, Grantown-on-Spey, PH26 3HW
 David MacLeod, 22 MacGregor Avenue, Grantown-on-Spey, PH26 3ET
 Brian Mackie, Ettenbreck, Glen Conrie, Strathdon, Aberdeenshire, AB36 8YR
 MacPherson Electrical Limited, 18 Birch Grive, Boat of Garten, PH24 3BA
 M McAllister Groundworks Ltd, Sarren, Newmill Road, Keith, AB55 5BT
 Graham McIntosh, Plumber, Upper Croft-na-Garn, Boat f Garten, PH24 3BY

Colin McKinlay, Waterford, 24 The Square, Grantown-on-Spey,
PH26 3HF
Iain Michie, 1 Curr Road, Dulnain Bridge, PH26 3NY
Jamie Munroe, 2 Birchview Cottages, Grantown-on-Spey, PH26
3HB
Mr N Mutch, Beechwood, Woodside Avenue, Grantown-on-
Spey, PH26 3JR
Mr R Taylor, Sofala, Carr Road, Carrbridge, PH23 3AD

Ross and Co Painters, Caberfeidh Avenue, Dingwall, Ross-shire,
IV15 9TD
S A Borthwick, Plumber, Tigh Mhor, Ardbrocilach Road, Kingussie,
PH21 1LD
Speyside Plumbing, Tomneen Farm, Craigellachie, Aberlour,
AB38 9SB
WJ Sellars, Glengarry, Forest Road, Grantown-on-Spey, PH26 3JL

The consultation period coincided with our employees main holiday period, when employees are stretched to the limit covering staff shortages made it very difficult to allocate time to study this document. Also major additional demands on our time is being made due to recent changes in the building regulations, this compounded with severe staff shortages of Building Control Officers resulting in great difficulties to obtaining building warrants, is creating 'work load' problems. In the following therefore, we have tried to set out the matters that concern us most: and until such time as they are fully and properly addressed, we feel we have no option but to object formally to the Plan.

That said, the main areas of concern we have are as follows:-

1. The plan is complicated, full of jargon and without further consultation with officials, one could not easily identify where one might be allowed to develop. The exception being the larger housing developments which only volume builders, Tulloch and Robertsons' can finance. I.e. the policy seems to promote the large scale developments at the expense of smaller local firms.
2. Apart from the development areas designated within settlement boundaries, which must constitute less than 5% of the parkland area no other potential housing development zones are identified (preciously we had a 'general countryside ' zone, which was more sympathetic towards development). The idea that there are no other suitable housing sites in the remainder of the area is fanciful in the extreme, as there must be countless laces where individual houses can be sited without difficulty. Given the importance of housing to the area, to leave the Markey to find these sites in the way proposed in the Plan is the opposite of good planning; and we object to that approach as being unhelpful; unwieldy; and prejudicial to the interests of those whose livelihoods depend on the building trade in the area.
3. Your policy 26 relating to housing out with settlements is non-specific and very restrictive, and clearly demonstrates an apparent lack of understanding of what constitutes the workload of small local firms.
4. The Cairngorms National Park Deposit Local Plan is not like a conventional local plan, which shows the distribution of the policies on a map base, and is therefore very easy to understand. The result of that convention not being used here, is that the Deposit Local Plan is very difficult to understand, and will be even more difficult to use in practice.
5. We understand that the principle behind the Deposit Local Plan is that the onus is on the users, having identified land in which they have an interest, to read through the plan and form a conclusion as to what level of development, if any, might be acceptable on it.
6. If that is the situation, then we object to the Plan specifically on the grounds that it is so complicated in character, and so confusing to use, that it falls well short of the prescription in the government advice on the form and content of local plans.

7. Moreover, a great many of the policies include words which carry value judgements, which ultimately depend on the view of the Planning Authority rather than the view of the user. The Plan is therefore seriously flawed, since in many cases, the user cannot reach a conclusion on the basis of the text of the Plan alone, as should be the case, if it is doing its job properly.

8. It is also impossible to understand how these value judgements will be made on a consistent basis, in a situation in which, as we understand it, any one of five different development control authorities could be involved.

9. The plan lists a number of major housing opportunities, but the majority if not all of these, under the control of the volume builders, who have the financial strength to acquire large tracts of land, and bank them until the time to develop them is right. The problem was initiated by the creation of CNPA. Without a supply of small building sites to sustain local builders, which in the case of Badenoch and Strathspey equals a workforce of several hundred people, they will undoubtedly falter, and in some cases, may fail. That situation is seriously compounded by the practice favoured by the volume builders in the area, of importing their own labour into the Badenoch and Strathspey area, from further afield.

10. Regrettably, the plan in its present form fails to acknowledge the responsibility the Park Authority has to the local building trade, and the contribution it makes to the local economy, as required in the fourth aim for the Park set out in the Act. We therefore further object to the Plan on the grounds that it fails to take into account the interests of one of the biggest employers in the area, and is thus flawed.

11. These views are shared by the local builders in the area; the local chamber of Commerce; and the MSP for the area; all of whom support our intention to sustain an objection to the Plan in its present form; and to fight for a revised Plan that better reflects local interests, set into a text that meets the requirements of a Local Plan, as described in the Scottish Executive advice and guidance on the matter.

12. Finally, we suggest that as a next step, we invite the relevant Park staff to a meeting with the local builders and their supporters, together with one or two neutral assessors, to see if we can agree a way forward that takes us clear of the threat of a trial of strength at a Public Inquiry.

Summary

The policies relating to housing will have a major negative impact on future business opportunities and sustainability of local building firms. 29 building firms have subscribed to the representation. The consultation period coincided with a holiday period in the building industry which made responding difficult, and also with a busy period when there is a shortage of building standards staff.

- the plan is unclear in terms of understanding what developments might be allowed. The only exception is housing allocations on land owned by volume house builders. The approach seems to therefore promote large scale development.
- other than the land allocated in settlement boundaries no other land is identified for development which is unhelpful.
- the housing outwith settlements policy is non-specific and very restrictive which is unhelpful to local builders
- the proposals maps are not clear in how the policies are applied, which makes the plan difficult to understand.
- while recognising that the policies apply across the Park and potential developers must look at their proposal in light of the policies, this approach is complicated and unusable.
- the wording of the policies is ambiguous and words which carry value judgements and are open to interpretation, which leaves it unclear to developers what will be appropriate and on what approach individual planners will take.
- the sites allocated most are already in the control of volume builders. There should also be a supply of small building sites to sustain local builders who employ local employees and contribute to the local economy.

CNPA analysis

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. The Plan cannot however retain certain sites to be developed by particular developers, and local developers must be reassured that there are appropriate opportunities to meet their aspirations for the life time of the Plan.

Policy Housing (land supply)	Name Mairi Maciver	Company	Communities Scotland	Objector Ref	025w
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Representation

29. In Section 7 under each individual strategic settlement we would welcome inclusion of timescales for completion of the numbers of homes proposed, perhaps by making a clearer link to Table 4 on page 44. Also, ensure that the figures on page 44 match the figures under individual strategic settlements in terms of accuracy and completeness.

Summary

In Section 7 timescales for the completion of the number of houses in each settlement should be included, making clear the link to Table 4.

CNPA analysis

The links between the proposals section and Table 4 are noted, and some cross referencing will be made to help clarify the position.

Policy Housing (land supply)	Name DW and IM Duncan	Company		Objector Ref	037a
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Representation

While there are many favourable proposals which we would expect to see within an area designated as a National Park, the emphasis on development ie a major house building programme, is we believe at odds with the first aim of the National Park which is 'to conserve and enhance the natural and cultural heritage of the area' and is in the long term unsustainable.

Summary

The focus of the Local Plan on housing development is at odds with the first aim of the National Park.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply) **Name** DW and IM Duncan **Company** **Objector Ref** 037h

Representation

Table 2 - It is rather concerning that there is a acceptance here of the requirement for nearly 500 units to be classed as second homes and vacant property. Other NP areas in the UK have taken a more robust approach to the issue of second homes and we ca see no reason why the Cairngorms NP Authority should not do likewise.

The total allocation of 1640 house units in the next 10 years is surely unsustainable. We have already mentioned the issue of water supply and waste water treatment, but what of the increase in energy usage, pollution, vehicles and associated traffic congestion in the towns and villages?

The negative impact of this scale of house building will undoubtedly damage important habitats and ecosystems mainly in Strathspey and Badenoch in area such as An Camus Mor, Carrbridge and Nethy Bridge. The harmful impacts on the landscape and the character of the existing settlements will be evident in the villages of Aviemore, Boat of Garten, Carrbridge, Newtonmore and Kincaig.

Summary

The addition of 500 houses as second homes in the table is concerning. The CNPA should take a more robust approach to resisting such homes. The total allocation of 1640 houses in the next 10 years seems unsustainable, in terms of water provision, energy use, pollution, traffic and congestion. Such level of development would have an adverse impact on important habitats in the area, and the impact on landscape is already evident in certain settlements in Strathspey.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply) **Name** Dr Sheila Sedgwick **Company** Ballater & Crathie Community Council **Objector Ref** 091j

Representation

5.25-5.26 Ballater and Crathie Community Council believes that the housing requirements as indicated in North East Together (NEST) 2001-2016 do not reflect the needs of the Park. Many residents consider the 250 housing units proposed for Ballater alone is over-development and is unacceptable. The Plan does not take into account the 60 or more houses built in Ballater since 2002.

Summary

The housing requirements identified in NEST better reflect the actual need for the Mar area and in turn Ballater.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply) **Name** James Gibbs **Company** HIE Inverness and East Highland **Objector Ref** 421a

Representation

Housing - We welcome the provision for additional housing in both Badenoch and Strathspey and Moray, although we believe that the CNPA should also consider additional capacity at other settlements in Moray that are within the park boundary in addition to Tomintoul.

Summary

Support the housing provision but feel additional capacity should be provided in Moray.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply) **Name** Rona Main **Company** Scottish Enterprise Grampian **Objector Ref** 425a(d)
Agent Steve Crawford

Representation

Housing

On housing we have made the point that the housing allocations tend to lead the development of employment opportunities. Concentrating the majority of houses on the western side of the Park is not an appropriate policy response to the issues affecting the SE Grampian area. SE Grampian would therefore wish to see a more equal spread across the Park settlements and more viable housing sites allocated in settlements on the eastern side of the Park.

Housing for key workers is an essential element of economic development and the future viability of settlements. The affordable housing

policies as they stand appear very restrictive and may discourage development. We believe a more equitable approach is required to ensure that affordable and key worker housing is achievable. This could include allocating sites specifically for such housing.

Summary

Concentrating housing in the west side of the Park is not appropriate to developing employment opportunities across the Park. The spread of sites should be more equal spread. Housing for key workers is essential for economic development and the future viability of settlements. The affordable housing policies are very restrictive and may discourage development. A more equitable approach is required which could include allocating sites specifically for such housing.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing and land allocations will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (land supply)	Name Mrs Jane Angus	Company	Objector Ref	437k
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Representation

Social effects of too rapid enlargement in Section 7 1 p.51 Have social, economic, educational and medical matters been considered, and if so by whom? Surely this should involve Counties as well as local consultation. The full Rural Needs Survey seems to have been cast aside. It cannot be sustainable for such large housing developments for local or self-employment to be built and the impression we take from this is that they will be for retired people, or those commuting to work in the Boom City of Inverness. If the Transport section included a turntable at Dalwhinnie so that commuting trains were used, I might think differently on this point. Nor is there discussion of new working categories ie: c-selling, IT consultancy work, publishing etc., depends on more Broadband or secure wireless methods. Tourism is also affected by lack of this, with so many people being workaholics and this applies to new mobile phones' reception. Taxation changes, foreign ownership and educational failure have huge effects on employment, transport and enterprise. I have seen nothing about consultation with organisations like Imperial Innovations to explore possibilities in the designing, pharmaceutical, communication or educational sectors. And we are still waiting for information on digital reception.

Summary

Consideration should be given to the effects of rapid growth on social, economic, educational and medical matters. It cannot be appropriate to develop large numbers of houses for people to commute to the city or to provide housing for the retired. The finds of the Rural Needs Survey should be included. Greater consideration should be given to home working, specialist employment opportunities in the new technological era, tourism providing employment opportunities, and possible tax changes

CNPA analysis

The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including creating the correct level of opportunities for employment. Further work is needed to ensure that land allocations are matched with the

appropriate level social support (WORK WITH LOCAL AUTHORITIES ON THIS). A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name John M Smith Agent Malloy Smith Associates	Company	Objector Ref	387
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Representation

Planning Policy

Scottish Planning Policy 3 (SPP3) "Planning for Housing" sets out the Scottish Government's key themes for housing in Scotland, which are to:

- Create quality residential environments;
- Guide development to the right places; and
- Deliver an adequate supply of housing land.

Paragraph 64 states specifically that: "Local plans must conform to the structure plan and provide sufficient effective land to meet the housing land requirement for at least 5 years from the date of adoption. Local plans should also identify further sites to meet requirements in the medium term."

We are of the opinion that there may be a short to medium term shortfall in the supply of effective housing land which can be partly resolved by incorporating these two sites in the new local plan.

Paragraph 19 promotes access to open space, preferably within walking distance, as being important to the health and well being of communities. There is a clear opportunity in these sites being included within the local plan and implemented that access routes and the environment of the area can be enhanced to the benefit of the area. The location of the sites, together with the provision of well designed access routes with good linkages to the town can also contribute to the effective integration of land use and transport. This is given policy support by Paragraph 35 and is augmented by Paragraph 49 which states that most housing requirements should be met within or adjacent to existing settlements.

In terms of creating long-term sustainable settlement strategies, Paragraph 28 states that key considerations should be:

- efficient use of land and existing buildings, energy and infrastructure;
- co-ordination of housing land provision with improvements in infrastructure, including transport and educational investment, and with other major proposals such as business or industrial development;
- the need to ensure that all sections of the community have good access to jobs and services; and

- the protection and enhancement of the environment.

Paragraph 29 expands what is meant by using land efficiently and is supportive of the re-use of previously developed land. Parts of both sites have previously been used as a sewage treatment works and car park. Whilst part of the land is recognised as greenfield, Paragraph 37 states that: "in seeking to locate new housing where it will be accessible by a range of forms of transport, planning authorities may conclude that the release of certain areas of greenfield land would result in a more sustainable pattern of development."

We are of the opinion that these sites meet the requirements for new development to be fully accessible by different modes of transport and which can be integrated into existing networks. The inter-related design of new housing, flood alleviation measures and access and environmental improvements can be achieved at these sites.

Scottish Planning Policy 7 (SPP7) Paragraph 1 of SPP7 states that its central purpose is to: "prevent further development which would have a significant probability of being affected by flooding or which would increase the probability of flooding elsewhere." It also stresses in paragraph 3 that: "communities should be free from the threat of flooding."

The proposed site, whilst being within SEPA's indicative 1 in 200 year flood risk area, would incorporate measures to both protect any new development from flooding and extend that protection to properties currently affected by flooding.

In relation to new development, paragraph 15 includes the following principles:

"In areas characterised as 'medium to high' flood risk for watercourse and coastal flooding new development should be focused on built up areas and all development must be safeguarded from the risk of flooding

New material should not:

- increase the probability of flooding elsewhere;
- add to the area of land which requires protection by flood prevention measures;
- affect the ability of the functional flood plain to attenuate the effects of flooding by storing water;
- interfere detrimentally with the flow of water in the flood plain;
- compromise major options for future shoreline or river management.

The proposed sites can substantially satisfy these requirements through responsive design and the integration of water bodies which will accommodate an amount of floodwater in a managed way. It is contested that the sites, which are partially vacant/derelict, are within the built up area and with the implementation of appropriate landraising measures will contribute to the safeguarding both proposed and existing properties.

Design proposals would be based on an element of landraising to achieve the aforementioned benefits and paragraph 19 of SPP7 is particularly relevant in that regard. It states that landraising may have a role and that proposals should:

- be linked to provision/maintenance of floodwater storage to replace lost capacity of floodplain elsewhere;
- have a neutral or positive effect on the probability of flooding elsewhere, INCLUDING EXISTING PROPERTIES;
- not create a need for flood prevention measures elsewhere;
- not create islands of development but adjoin developed areas;

- be set back from the bank of the watercourse.

The paragraph concludes that in the context of the SPP land affected by landraising will no longer be part of the floodplain and will not be construed as a flood prevention measure. The effect of releasing the proposed site and implementing such a scheme would therefore be to remove existing properties and new development from flood risk. The great potential of these sites lies in an integrated approach. An example of this is the opportunity to integrate improved access routes bounding the river which allows the landraised platform to be set back from the river bank, thereby creating better outdoor access, improved environmental amenity and sustainable flood alleviation.

The incorporation of elements such as water bodies and path routes within a responsive design could transform a partially vacant site to one which achieves high quality urban form, alleviates flood risk at existing properties and promotes local biodiversity and outdoor access.

Structure Plan

The Structure Plan vision is founded on three interdependent principles of sustainable development. Reflecting the local context, these are expressed as:

- supporting the viability of communities;
- developing a prosperous and vibrant local economy; and
- safeguarding and enhancing the natural and built environment.

These three principles can also be found within "Designing for Sustainability in the Highlands" which was produced as development plan policy guidance in 2006. The purpose of this document is to support the preparation of "Sustainable Design Statements"(SDS) in support of planning applications. It is however considered that many of the issues to be explored by an SDS have already been taken into account and indications are that a successful development which accords with the spirit of sustainable design/development can be achieved. The Highland Structure Plan recognises that adequate provision of housing is a pre-requisite of economic growth, but that it must be done in such a way to minimise impacts to the environment. The structure plan identifies a need for 1,750 new houses within the Badenoch and Strathspey area between 1998 and 2017. This housing allocation should be facilitated by the relevant local plan.

The proposed new community at An is noted within the structure plan and it is stated that housing land supply in the area can only be maintained if this site is brought forward. However, in the short to medium term, a number of constraints exist which prevent this site from being fully implemented. It is therefore contended that it will not in fact immediately contribute to housing land supply and a shortfall may exist. Including these sites within the new local plan can contribute to resolving any potential shortfall.

The infrastructure section of the structure plan recognises flooding issues associated with the River Spey. It states that flood consultation areas will be identified by local plans using the SEPA flood risk map. Proposal NH1 'Flood Consultation Areas' states that: Local plans will identify areas with a perceptible risk of flooding. Within these areas, all development proposals will be assessed for their compatibility with the flood risk and with the flow character of the watercourse. The new local plan does not appear to fulfil this requirement.

The strategic themes of the Draft Community Plan are referred to by the structure plan and these include consolidating the settlement hierarchy. This approach recognises the benefits in terms of service provision and the ability to support a range of facilities. It is considered that including these sites in the new local plan is completely in accordance with structure plan policies.

Local Plan

Policy 13 'Water Resources' of the deposit local plan includes provision that new development will:

- have no significant adverse impact on the current hydrology/water environment; and
- Be free from significant risk of flooding, not increase the risk of flooding elsewhere, not add to the area of land that requires flood prevention measures, or affect the ability of the functional flood plain to store or move flood waters. Development in areas susceptible to flooding (as defined by SPP7s Flood Risk Framework, SEPAs Flood Risk maps, or other flood risk information) will require a developer-funded flood risk assessment.

We see no reason to suggest that any future planning application could not satisfy these requirements. Policy 17 'Sustainable Development' sets out a number of factors which should be incorporated in new development proposals. Again, we believe that any future planning application concerning these sites would fulfil these requirements, in particular ensuring a healthy, affordable resource efficient and functional building environment that respects the natural environment.

The deposit local plan acknowledges that a new community at Cambusmore would require infrastructure development and that this is needed to maintain housing land supply and achieve 1750 new units in the period 1998 to 2017. It is noted that fewer new houses have been built than expected and that this has inflated land prices and exacerbated affordability issues. We consider that the considerable infrastructure requirements which need to be in place for Cambusmore to fulfil its contribution to effective housing land supply will in reality result in some delay in the site coming 'on-line' and that the proposed sites can contribute to meeting resultant demand and alleviating development pressure in a sustainable and beneficial location.

Direct pedestrian and cycle connection will require construction of a new pedestrian bridge. Landraising to the town centre side of the River Spey provides a potential landfall site for such a bridge location. The development of these sites can therefore assist in providing such a pedestrian facility and provide a direct connection from An Camas Mor to the town centre for the commencement of the An Camas Mor development. There is also potential to link into an improved core path network.

Wider Policy Considerations

The Cairngorms National Park Plan contains outcomes for 2012 which include reducing the gap between housing supply and housing demand. The plan also includes a strategic objective to focus growth in the main settlements (which Aviemore is). Identifying these sites as a housing opportunity would clearly contribute to achieving these outcomes and objectives.

Conclusion

In conclusion, the basis of this objection is the omission from the Cairngorms National Park Deposit Local Plan of two sites at Dalfaber Road, Aviemore, as housing opportunity sites and their exclusion from the proposed settlement boundary. We consider that, for the

aforementioned reasons, the sites should form part of the new local plan as housing opportunity sites.

Summary

Two additional sites should be included as housing allocation within Aviemore to ensure an effective land supply and integrate new housing with existing communities. The sites are accessible and whilst in the floodplain, development which would mitigate flood risk in accordance with SPP7. Details are provided on how this would be achieved.

CNPA analysis

The allocated sites within Aviemore will be analysed in light of the comments received. This analysis will be linked to the need for housing land within the area, and the effectiveness of the sites included in the deposit plan. The sites will also be judged against the SEA findings, the physical constraints of these sites and the requirements for effectiveness as set out in national guidance. Having assessed these sites, a review will be undertaken of the alternative land suggested to ascertain its qualities in meeting the local housing need, and the impact it would have when assessed through the SEA. (TECHNICAL ADVICE REQUIRED FROM NATURAL HERITAGE SECTION AND HIGHLAND COUNCIL ROADS DEPT).

Policy Housing (land supply) **Name** North East Mountain Trust **Company** North East Mountain Trust **Objector Ref** 443f

Representation

Section 5 Living and Working in the Park — Specifically on Housing Development Policies.

We find the approach to housing in the park seriously deficient and incompatible with the first, second and fourth aims of the park. This concern focuses on the scale of holiday home construction envisaged in Table 2 on page 43. It is vital that housing affordable to the local population is provided and provision to meet that demand incorporated into the plan.

Holiday homes are already a major feature of housing in the park especially in Badenoch and Strathspey and their purchase a major cause of the lack of housing for local people who cannot compete in the bidding system.

Commitment to large scale provision of holiday homes is also a commitment to how important aspects of tourism development will take place in the Park. There is adequate experience and knowledge from tourism development in areas, such as the Alps that clearly demonstrate the social damage done by permitting large scale holiday home development in communities and of the reduction in economic wealth generated by a tourism industry emphasizing this approach.

In addition, there is increasing evidence that proposed and planned housing developments, through their scale and number, are already affecting the natural resources of the Park. Examples are the threatened impacts on semi-natural woodlands. In this respect, the UK Biodiversity Action Plan (1994) is relevant as it states the UK Government's published policies. Viz: p.100, 6.48. "Action. Continue to protect ancient semi-natural woodlands and encourage forms of management which conserve their special characteristics. Encourage the extension and creation of native woodlands. Support the creation of community woodlands near population centres"

p.163, 10.15. "Policies and programmes have as their objective to maintain the present area of ancient and semi-natural woodlands; to expand the area of native woodland of a natural character;..." An additional example of the growing pressure on natural resources through excessive house building is Scottish Water's proposed increased demand on water resources from the Spey, which already sees

heavy demands on its resources.

Lastly, the carbon footprint of a policy that encourages sizeable housing development based on persons or families owning two homes is unacceptable in terms of its contribution towards climate change. We therefore object, to the current housing policies and approach that would permit such development.

Summary

The approach to housing is incompatible with the 1st, 2nd and 4th aims of the Park. Particularly concerning is the focus on holiday homes in table 2. Affordable housing should be the key focus to housing provision to ensure sustainable communities. The scale of land allocated will also affect the natural resources of the Park, examples of which can be seen across the Park. Also this level of development is unacceptable in terms of its contribution towards climate change.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name Reidhaven Estate	Company	Reidhaven Estate	Objector Ref	456c
	Agent Jill Paterson				

Representation

Reidhaven Estate object to the overall housing strategy, figures and allocations of these units and Tables 2, 3 and 4. The estimate of housing need seems to be based on a set of assumptions that are not entirely clear from the plan itself.

The total additional household projection calculation to 2016 seems to be based on a low growth scenario and does not take into account the 132 units of affordable housing.

The allocation of these units in Table 4 is of key concern. Capacity in many of the intermediate (e.g. Boat of Garten, Dulnain Bridge, Nethy Bridge) settlements in the medium to long term shows little growth. It is important that future development opportunities in these settlements are identified in order to provide choice and support existing services.

Reidhaven Estate do not object to the principle of a new settlement at An Cambusmore but consider that development should also be directed to the existing settlements as well as this new settlement.

Concern regarding timescales for new settlement and whether the number of units is achievable as forecast due to infrastructure requirements.

Modifications:

Revision to the housing strategy to include future opportunities for housing in the intermediate settlements.

Revision to household projection calculation.

Summary

The underlying assumptions on which the housing strategy is based are not clear. The total household projection to 2016 seems based on a low growth scenario and does not take account of the 132 affordable houses. The allocation of units in table 4 in intermediate settlements shows little growth for the medium to long term. It is important that such settlements are supported to provide choice and support for existing services. New developments within the Park should be directed in a more balanced way to existing settlements rather than focusing on An Camas Mor. Also, is the number of units for the new settlement achievable in the projected timescales due to the need for infrastructure investment?

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name Donald Lockhart	Company	Albyn Housing Association	Objector Ref	385b
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Representation

In terms of specific land allocations, again it is not intended to make comment on every settlement as this would be beyond the scope of this reply, however it is still of concern that relatively little new land has been added to the existing land allocation. Unquestionably the Plan places an over-reliance on the prospect of An Camus Mor becoming a development reality despite the very significant infrastructure challenge that it poses. In respect of the settlement maps and comments associated with them, it has become clear in the various other Local Plan reviews that are currently ongoing in the Highland Council area, the vexed issue of indicative density levels has become an area of significant concern. Often these are not informed by the subsequent rigorous feasibility studies which come at a later stage which often prove that at Local Plan density levels the project is unviable. This then becomes a matter of intense interest among parties opposed to development and one which is difficult to argue against. It would be better if the Plan made it clear that these numbers were truly indicative and that considerations of acceptable density levels were to be subject to other tests, such as maximising the use of diminishing serviceable sites together with rigorous analysis of the sustainability issues. In a Plan not over-supplied with allocated land it is important that nothing is done to make zoned sites less likely to come forward.

Summary

Concern remains that relatively little new land has been added to the existing land allocation. There is an over-reliance on the future

development of An Camus Mor despite the significant infrastructure challenge that it poses. The issue of indicative densities marked on proposals maps is unhelpful as these are often unsupported by detailed feasibility studies which when carried out later often prove density levels the project is unviable, which can then generate unhelpful interest among parties opposed to development and one which is difficult to argue against. The plan should instead make it clear that numbers were truly indicative and considerations of density levels will be subject to other tests, such as maximising the use of diminishing serviceable sites together with rigorous analysis of the sustainability issues.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made. Further information on the progress of An Camas Mor will be sought from the land owner to assess the impact this will have on the effectiveness of the site. (FURTHER INFORMATION REQUIRED REGARDING TIMESCALES FOR AN CAMAS MOR)

Policy Housing (land supply) **Name** Dinnet and Kinord Estate **Company** Dinnet and Kinord Estate **Objector Ref** 438b
Agent John Findlay

Representation

1.0 INTRODUCTION

1.1 This formal objection to Cairngorms National Park Deposit Local Plan is made on behalf of Dinnet and Kinord Estate. Failing a resolution of this objection, Dinnet and Kinord Estate wish the opportunity for their objection to be considered at a future Public Local Inquiry into the Deposit Local Plan.

1.2 Dinnet & Kinord Estate, which extends to approximately 25,000 acres, is located at the main eastern entry point to the Cairngorms National Park. The Estate has embraced the objectives of the Cairngorms National Park Authority and contributes significantly to the economy of the area. It currently employs 15 full time workers with a significantly greater number in seasonal occupation. Employee numbers have increased in recent years and it is anticipated this growth will continue. The Estate's activities include farming, forestry, country sports and property lettings.

1.3 Dinnet & Kinord Estate would welcome the opportunity to discuss the terms of this Objection and their related Objections with the Cairngorms National Park Authority.

2.0 OBJECTION

2.1 This objection by Dinnet and Kinord Estate relates to the housing land requirement and supply, as specified in the Cairngorms National Park Deposit Local Plan. The housing land requirement calculation in Table 2 of the Deposit Local Plan should be increased. Similarly, the phased land supply should be increased in the Aberdeenshire part of the Cairngorms National Park with provision made in

Table 4 for the allocation of 60 units to Dinnet.

3.0 GROUNDS OF OBJECTION

3.1 Dinnet and Kinord Estate have set out in Objection 1 their justification for the identification of Dinnet as a settlement with provision for future housing development amounting to around 60 units. The National Park Plan directs the Local Plan to provide enough effective land for market and affordable housing to meet the economic and social needs of the Park's Communities, encouraging proactive settlement growth in the main settlements and the provision of land for housing growth to meet the social and economic needs of other settlements/communities.

3.2 It is the Estate's contention that the phased land supply currently proposed by the Local Plan fails to meet those objectives. Paragraph 5.37 of the Plan highlights that there is no exact measure of how many houses will be required in the future, nor any accurate method of predicting how many houses will be built during the lifetime of the Local Plan. The Planning Authority simply makes an estimate of the likely need and demand, as well as the implications of its own housing and economic objectives. In such circumstances it is, therefore, essential that efficient flexibility is built in to allow for uncertainty and in order to accommodate the highest growth scenario. Accordingly, the figures in Table 2 should be increased substantially in order to accommodate the level of housing considered necessary at Dinnet. That scale of housing is necessary to realise diversification opportunities in terms of new business and tourism related developments, which will contribute to the overall economic benefit of the National Park Area.

4.0 PROPOSED MODIFICATION

4.1 Having regard to the above, it is Dinnet & Kinord Estates contention that the housing land requirement requires to be increased in Table 2 to allow for additional flexibility. The phased land supply in Table 3 relative to the Aberdeenshire part of the Cairngorms National Park Authority Area should be increased to make provision for an additional 60 units at Dinnet. Furthermore, Table 4 should be amended to include Dinnet with a housing allocation specified of 60 units.

4.2 Dinnet and Kinord Estate would welcome dialogue with the National Park Authority on the terms of this objection in an attempt to agree a modification to the Plan in advance of the Public Local Inquiry into the Plan. Failing agreement, the Estate would wish the objection to be considered at that Public Inquiry.

Summary

The tables for housing land requirement in table 2 and 3 should be amended to include for the proposed allocation of 60 houses at Dinnet. Table 4 should also be amended to make allowance for this allocation.

The local plan must provide enough effective land for market and affordable housing to meet the economic and social needs of local communities encouraging proactive growth. The land supply currently allocated fails to meet this objective. Para 5.37 acknowledges that there is not exact measure of how many houses will be required in the future, nor any accurate method of predicting how many houses will be built during the lifetime of the Local Plan. As the figure is therefore an estimate it is essential to build in a degree of flexibility to allow for uncertainty and in order to accommodate the highest growth scenario. Table 2 should therefore be increased to accommodate the level of housing considered necessary at Dinnet. That scale of housing is necessary to realise diversification opportunities in terms of new business and tourism related developments, which will contribute to the overall economic benefit of the

National Park Area.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name Jamie Williamson	Company	Alvie and Dalraddy Estate	Objector Ref	439q
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Representation

The problem is not the limited supply of effective land (5.30) for new housing but regulations, taxations and constraints levied by government, combined with low interest rates, an increase in loans to those less able to service their level of borrowing, government encouragement of home ownership and a reduction in alternative investment opportunities. The promotion of the Cairngorms National Park as a tourist destination and a nice place to retire to or have a holiday home has exacerbated the problem within the National Park. The current imbalance between supply and demand for houses in the National Park resulting in increase in house prices is predominantly the result of government action. Only a fundamental change in government attitude and action or an economic downturn will resolve the problem.

Supply of Land

A large proportion of the land mass of the National Park is at an elevation that is inappropriate for housing. 39% of the land has had natural heritage designations imposed where there is a presumption against housing. Within the straths significant proportions of the low lying ground alongside the river systems are vulnerable to flood events where there is also a presumption against new housing. Of the remaining area, which possibly accounts for no more than 10% of the total area of the Park, the planning authority wishes to impose further restrictions, regulations and taxes. There is a presumption against additional houses in the countryside, single houses not close to other dwellings, houses on ancient and semi-natural ancient woodland sites, even when no remnant of the ancient woodland remains, houses on geological conservation review sites. Such constraints and restrictions all limit the amount of land available for new housing.

Of land that meets the criteria as suitable for development for housing a proportion is owned by government in the form of SNH and the Forestry Commission. The Forestry Commission used to be expected to provide a 5% return on the investment made, more recently the annual losses made by Forestry Commission Scotland have exceeded £250 million. We suggest that it would be within the national interest and be more cost effective for the nation to release some Forestry Commission land for housing and instead encourage and invest in the private sector to provide a strategic reserve of timber. SNH and the Forestry Commission combined have sufficient land holdings to satisfy the demand for development land within the National Park.

Non government land is frequently offered for development and to date has provided most of the development land within the Park since its inception. However the disposal of privately owned land for development is discouraged through taxation. If a traditional landowner (farming, forestry or sporting estate) sells land for development there can be up to 40% Capital Gains Tax plus stamp duty. If the land is not sold but developed as houses for rent the landowner will be liable to as much as 40% Inheritance Tax on transfer of ownership. For a landowner dependent on his land to provide a living, such high levels of taxation is a major disincentive to releasing land for development. As a result land is usually only released for development when the landowner is facing a financial crisis or when the value is so high as to make the transaction worth while despite draconian taxation.

If the Cairngorms National Park Authority really believes that 'the limited supply of land has encouraged inflation of/and prices .,' resulting in a... "higher profit sales which are often unaffordable to those working in the area." (5.30), the government could resolve the problem by a change in taxation, releasing government owned land for development, or relaxing government imposed constraints and restrictions on development.

Increase in House Prices

The recent increase in the value of houses is not confined to the National Park; it is a nationwide phenomenon that can only ultimately be resolved by changes in policy by national government. On average Scottish house prices were 31% above their historic trend in 2006 (RR Donnelly for the Scottish Executive June 2007, 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007, page 4) See figure 1. (graph supplied in support of figures – Comparison of UK Real house prices - Source DCLG Table 590) However for the 5 years to the end of 2006 house price growth was 106% across the Highlands and Islands area which was more than Edinburgh, Glasgow and Aberdeen.(RR Donnelly for the Scottish Executive June 2007, 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007, page 6) See figure 3. (graph supplied in support of figures – Real Regional House Prices - Source HBoS, HM Treasury GDP Deflator)

There are a number of reasons for the recent demand for houses exceeding supply and resulting in a rise in house prices.

Changes in the Population

Between 1991 and 2006 the surplus of dwellings over households has remained relatively stable (Ibid Figure 24, page 30) See figure 24. (Graph supplied in support of text, Household and Dwelling Estimates – Scotland, Source GROS and Scottish Executive Housing statistics Bulletin) Over this period the Scottish population has remained relatively static. The increase in house prices is therefore not due to an increase in either population or the number of households nationally.

There may have been an increase in the population and/or households within the park greater than the increase in the number of houses available (The population of Badenoch and Strathspey increased by 6.9% between 1991 and 2001 which is nearly 3 times faster than the rate for the Highland Region as a whole. It is the fastest population growth of any rural district in Scotland (Highland Council figures as reported by Roy Turnbull in Strathspey and Badenoch Herald on 5th September 2007 page 7)). This is speculation. It is more

likely that there has been an increase in the number of people wanting to move into the Park to retire or to purchase second homes. The promotion of National Parks as nice areas to visit and live and for outdoor recreation results in an increase in demand for holiday and retirement homes. This is what has happened in National Parks in England and Wales; the Cairngorms National Park is unlikely to be any different. As the Cairngorms National Park is more remote from major centres of population than other National Parks in the UK, the demand for accommodation per visitor will be higher. Tourists require accommodation, particularly where the tourist destination requires an over night stay. Increasing tourism will increase the demand for additional accommodation. Traditional land uses such as farming and forestry require relatively few dwellings for residents compared with the needs of tourism. Increasing the dominance of tourism in the local economy will therefore also increase the demand for more short term occupancy accommodation.

The problem of the Cairngorms National Park having a “honey pot” effect was highlighted by the Cairngorms Working Party; the working party was set up by government to consider whether a National Park designation in the Cairngorms was appropriate. The working party concluded that a National Park designation was not appropriate; one of the reasons being the potential problems that could be created by attracting more visitors; however the government chose to ignore the conclusions and recommendations of the working party.

The resident population is relatively static: it is an aging population that will decline naturally as there are an insufficient proportion of residents of breeding age. The Cairngorms National Park Plan predicted that over the next 10 years (CNPA Cairngorms National Park Plan Draft for Approval 2006):

1. The number of residents within the Park in the 65+ age group will increase from 20% of the population in 2004 to 27% by 2016.
2. More young adults leave the Park than come into it. As a result fewer children are being born in the area leading to a decline in the number of children over time (CNPA Board Paper 1636 Paper 3 Housing, 6th October 2006).
3. The number of children in the 0 to 15 age group will fall from 17% of the population in 2004 to 12% by 2016.

We can therefore conclude that the shortage of housing in the Park is being driven by demand for houses from people resident outside the Park.

Although house prices has seen an unprecedented rise within the Cairngorms National Park with Badenoch & Strathspey recording the third steepest rise in median new house prices amongst the Highland Council's 22 wards between 2004 and 2006 (Housing ladder a bigger step for local families, as reported in the Strathspey and Badenoch Herald, 12th September 2007) both house and agricultural land prices are still significantly less than several other areas in the UK (Eddie Gillanders, “Rise in farmland prices predicted to continue” as reported in Press and Journal on 18th September 2007 page 19). Households selling up for example in Edinburgh or the south east of England can still purchase equivalent properties within the Cairngorm's National Park more cheaply leaving spare cash to reduce borrowing or fund retirement. Reducing the value of houses within the Park relative to properties elsewhere in the UK will make owning a home within the Park even more attractive and further fuel demand.

The recent growth in Inverness has also increased demand for houses in Badenoch & Strathspey as it is within commuting distance. Government hype on promoting the Cairngorms National Park as a nice place to visit or live has encouraged the North West part of the

Park to be viewed as one of the most desirable commuting locations for Inverness.

If an about turn by rescinding the National Park designation is politically unacceptable, the Cairngorms National Park Authority could mitigate the demand for houses within the National Park by encouraging a more balanced rural economy less dominated by tourism. The Cairngorms National Park Authority could restrict housing to those who can claim residency within the Park and their dependents, or have jobs or will create jobs within the Park.

We suggest that planning within the Park should be primarily for the benefit of residents in the Park and not for those who seek to utilise the Park for their recreation or move into the Park just because it is a nice place to live.

Low Cost of Borrowing.

The most recent surge in demand for homes has been driven by a decline in the cost of credit. Between March 2000 and October 2003 the Bank of England's base rate of interest fell from 6% to 3.5% (RR Donnelly for the Scottish Executive June 2007 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007' page 8). It took the Bank of England 4 increases in interest rates in 2004 from 3.75% to 4.75% to temper demand (RR Donnelly for the Scottish Executive June 2007 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007' page 4). See figure 2. Over the last year there have been further increases in interest rates and there is evidence that the market is slowing (RR Donnelly for the Scottish Executive June 2007 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007' page 5). A growing number of people have been investing in houses, seeing it as a good investment; many have been persuaded that house prices will continue to rise. In 1989 and 2003 when house prices rose, few home owners were allowed to take out mortgages more than three times the household's annual income. Despite this the rise in interest rates to dampen the demand gave rise to negative equity and resulted in repossessions and sequestration as homeowners struggled to cope with the higher cost of borrowing. The current increase in house prices is different. The buoyancy in the economy and 'feel good' factor is no longer based on a favourable balance of payments with other nations or an improvement in national productivity but this time on full employment and consumer spending which is funded by borrowing. As a nation we now owe more than the nation's gross domestic product (Report from Consultancy firm Grant Thornton, Press and Journal 24th August, 'Buy now, pay later' culture Debts outstrips amount generated by Britain's Economy). Mortgages are being offered at 4, 5 or even 6 times the annual income of the household (Andy Philip, Press and Journal, 25th August, Rural house prices outstripping cities some buyers paying up to six times their annual earnings for property). Whilst interest rates remain low, house prices and borrowing will continue to expand. Looking to the longer term it would appear that we are reaching a peak in demand. The UK economy is linked with and tends to reflect fluctuations in the economy of the United States. The economy of the United States looks like it could re-adjust or even go into recession. Interest rates have risen and households most heavily borrowed have been unable to meet their mortgage payments. In the short term this has resulted in an increase in repossessions - like the UK many householders have been persuaded to borrow well beyond their capability to service their borrowing if and when interest rates rise and the economy goes into recession. As the US economy slows, unemployment has risen, house prices have fallen and repossessions have increased (Noelle Knox, USA Today, 7th September 2007, Foreclosure proceedings set record). The result has been a collapse of several mortgage companies who have provided mortgages to households least able to afford them; this is referred to in the USA as the sub-prime mortgage market.

In the last few years the buoyancy of the UK economy has been far from prudent. It has been based on ever expanding government expenditure and borrowing by the nation. A further rise in interest rates is the single most effective means to slow the increase in house prices. However this time, there are many more people in debt and overstretched financially, including the government. A significant increase in interest rates could be catastrophic for those most heavily borrowed. Not only will many homes be repossessed, the boom in consumer spending may collapse putting many out of work. Recent difficulties experienced by the Northern Rock Building Society reflect what has already happened in the United States.

A rise in interest rates could take several years to take full effect as many householders have taken out fixed rate mortgages.

In the Cairngorms National Park, action by the Cairngorms National Park Authority can mitigate or exacerbate trends in house prices but they cannot affect the underlying trend which will be dictated by interest rates and policies nationally. In the UK financial markets expect interest rates to remain relatively low over the next few years (RR Donnelly for the Scottish Executive June 2007 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007' page 11). See figure 8. The Bank of England cannot afford to raise interest rates substantially in the present circumstances for fear of creating a major recession. The Cairngorms National Park Authority can take comfort that the present trend is for a slowing in demand for houses and there could even be a period of negative equity as is currently being experienced in several parts of the United States, but the Park Authority will need to look elsewhere if they are seeking a quick fix to the excess of demand over supply of housing within the Park.

Collapse in the stock market.

A reduction in share values around 1989 persuaded many small investors to invest in property instead of stocks and shares. If tax and regulations are favourable, equity from private investors and householders is sufficient to fund an expansion in house building in the Cairngorms National Park without the need for funding from government.

Government hype on home ownership.

Over the last decade government has encouraged home ownership in preference to renting²⁰. Council houses have been sold off and grants introduced to help those less able to afford home ownership to own their own homes. The UK now has probably the highest proportion of home ownership in Europe. The marketing of home ownership by the government as a good and wise investment has been another factor in forcing the cost of home ownership up.

When the house market is buoyant households are able to sell their existing homes and purchase new ones with relative ease: however when the market is relatively static or in decline householders are reluctant to move. This can severely restrict the mobility of labour. Another concern is that many households have been persuaded to invest in property taking out mortgages at the limit of their financial ability to service their mortgage. As a nation the UK is now amongst the most in debt nations per head of population in Europe.

We suggest that it would be both prudent and good for the economy to encourage more households to rent rather than buy. This would free up equity and the labour market and reduce debt. It has been estimated that 53% of houses to let in our rural areas is provided by the private sector. Unfortunately the tax and regulations on the private sector providing houses to let are a major disincentive to providing more accommodation for this purpose.

Within the Cairngorms National Park houses on holiday let can provide valuable tourist accommodation particularly for those seeking self catering holidays. Houses let on short assured tenancies provide accommodation for a mobile labour force plus those unable or unwilling to commit themselves to the ties and responsibilities of owning their own homes. A labour force housed in rented accommodation is more mobile and responsive to changes in employment opportunities than a labour force that owns their own property.

Despite the recent rise in house prices, property values in the Cairngorms National Park are still significantly less than properties in parts of Edinburgh, Glasgow, Aberdeen and the south east of England. Households seeking retirement or life style changes can still sell their homes in areas where property values are higher and purchase homes in the Cairngorms National Park at a lower value thereby releasing funds for their retirement. These households together with those seeking second or holiday homes help inflate the demand and price of homes in the National Park above what the local economy would otherwise dictate. The short term solution is to increase the number of homes for rent rather than building homes for sale.

Increasing the Speed of House Building

A recent study of increasing house prices in Scotland concluded that increasing the rate of private sector new build by 50% to 2016 would improve the affordability of home ownership in Scotland by only 6%, a 100% increase in new build would improve affordability by 10% (RR Donnelly for the Scottish Executive June 2007 'Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007' page 3).

The local building industry is already near its production capacity. Increasing the rate of building new homes in the National Park will increase the demand for skilled labour and materials, exceeding the supply locally. Skilled labour rates will rise increasing the cost of building new homes.

Speeding up the rate of building new homes in the Park also runs the risk of less skilled labour being attracted into the construction industry thereby lowering standards and quality of construction. Local shortage of skilled labour in construction can be mitigated by houses being built in modular form in factories elsewhere, thereby reducing the labour and range of skills required in construction locally. My example is the chalets on Dalraddy Holiday Park that are built outside Perth. The Highland Housing Alliance has linked with Tulloch Construction to build modular homes at the former Hunters of Brora woollen mill. They intend to start building modular homes in 8 Highland areas. (Jane Candlish in Press and Journal 13th September 2007 Page 1&7)

Selling Homes below Market Price

Forcing a proportion of homes to be sold to Housing Associations or Registered Social Landlords at below the cost of supplying these homes results in developers adding the losses sustained in providing these homes below cost to the price of homes built for sale on the open market. This is already beginning to result in a two tier pricing structure with open market homes being made even less affordable. Meanwhile the homes built to sell at a loss will be built as cheaply as possible.

For households looking to move up the housing ladder there will be an increasing gap between cheaply built “affordable” houses and those built for sale on the open market, as developers will have had to add on the losses incurred on houses they were forced to build to sell below the cost of providing them as if it were a tax.

For the resident landowner such as a farmer or crofter selling to release capital to make his or her holding more viable, a larger proportion of the landholding will have to be sold to realise a given amount of capital. This will encourage larger areas of land to be sold off to development as urban and suburban housing schemes rather than extending existing settlements in sympathy with the rural character of the area. It favours speculators to purchase larger areas to develop and then sell on rather than encouraging resident farmers and foresters to diversify their income streams. If the proportion of homes that have to be sold on below the cost of supply is too high or the price per “affordable” house or plot too low, no houses will be built.

On balance we consider manipulating the housing market in this way will damage the cultural heritage and rural character of the area. It will also increase the price of houses built and sold on the open market.

Conclusion

In the absence of a further rise in interest rates by the Bank of England or an economic downturn, lowering in house prices is unlikely, however there are signs that price growth is slowing (RR Donnelly for the Scottish Executive June 2007 ‘Economic Discussion Paper, Scottish Housing Market Review Evidence and Analysis 2007’ page 12). The Cairngorms National Park Authority cannot change the trend in house prices nationally.

An attraction of the Cairngorms National Park as a visitor destination is its relative seclusion, rural landscape and wilderness experience. Building to meet the full demand for houses within the Park will compromise some of the attributes of Park. We suggest that the Cairngorms National Park Authority should concentrate on ensuring that:

1. New houses that are built as far as practical are well built, energy efficient and do not compromise the natural and cultural heritage of the Park. The cost of energy is now a major contributor to the overall cost of running a home; energy use in buildings is responsible for almost half the CO2 emissions in the UK (Caroline Cumming, Shepherd & Wedderburn WS, e-bulletin 6th September 2007).
2. Greater effort is made to rebuild, renovate and refurbish existing buildings particularly where they are built of local materials and reflect vernacular construction.
3. A greater proportion of houses are built to rent rather than sell.
4. There is a presumption in favour of building houses to be occupied by existing residents and their dependents, those that are employed within the Park and those that are likely to invest in and contribute to the economy of the area.

Summary

The underlying problem is not of limited land supply but of taxes and regulatory constraints. Detailed comment is provided on historical issues which have created the current situation regarding price and availability, cost of borrowing and state of the economy, government attitude to home ownership, ownership issues, changes in population number and structure, growth in the second homes market, impact of the growth of Inverness, and the creation of the Park. The plan should therefore mitigate the demand by encouraging a more balanced rural economy and restrict housing provision to local people or those with jobs within the Park.

Increasing supply will not necessarily resolve the problem, causing an increase in demand. This would be matched with an increased demand on labour and materials which would lead to an increase in costs and potential decrease in standards. Innovative methods of provision should be considered such as modular homes. The focus on 'tied' affordable housing will also serve to exacerbate the two tier housing market which is emerging and restrict movement within the housing ladder. The level of affordable provision suggested in the Plan will ultimately result in no development happening within the Park.

The plan should therefore concentrate on ensuring that:

1. New houses are well built, energy efficient and do not compromise the natural and cultural heritage of the Park.
2. Greater effort is made to rebuild, renovate and refurbish existing buildings particularly where they are built of local materials and reflect vernacular construction.
3. A greater proportion of houses are built to rent rather than sell.
4. There is a presumption in favour of building houses to be occupied by existing residents and their dependents, those that are employed within the Park and those that are likely to invest in and contribute to the economy of the area.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name Dominic Fairlie	Company	Scotia Homes Ltd	Objector Ref	452a
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Representation

Clause 5.37 – Page 43

The text in the Local Plan appears to try hard to avoid using the phrase “zoning” in relation to its allocation of land for any use, except for in this clause. In other areas of the plan reference is made, quite correctly to developments which should reflect good design and not create a bland featureless Scotland. Zoning has been one of the main aspects of planning policy over the last 20 years or so that has created exactly the blandness that this plan is trying to avoid. Reference to “zone” should therefore be deleted and the clause

softened to imply that the housing should be provided as part of a mix of development and uses.

Modifications: Remove the word “zone” from the 8th line and replace with the word “provide”

Summary

The Plan seems to wish to avoid the word ‘zoning’ throughout except in para 5.37. The term ‘zone’ has resulted in exactly the blandness across Scotland, which the plan is trying to avoid. The wording should therefore be modified to delete the term and rephrased to imply that housing should be provided as part of a mix of development and uses. Replace the word with ‘provide’.

CNPA analysis

The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including creating the correct level of opportunities for employment. As a result of this consultation process further work will be undertaken to link more closely the demand for housing to economic prosperity and the need to work within the aims of the Park. This will be linked to the work ongoing relating to sustainability and also to the work undertaken in Ballater by the Princes Foundation relating to sustainable communities. (WORK WITH NATURAL HERITAGE SECTION AND ECONOMIC AND SOCIAL DEVELOPMENT SECTION)

Policy Housing (land supply)	Name The Cairngorms Campaign	Company The Cairngorms Campaign	Objector Ref	448f
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Representation

We find the approach to housing in the park seriously deficient and incompatible with the first, second and fourth aims of the park. This concern focuses on the scale of holiday home construction envisaged in Table 2 on page 43. It is vital that housing affordable to the local population is provided and provision to meet that demand incorporated into the plan.

Holiday homes are already a major feature of housing in the park especially in Badenoch and Strathspey and their purchase a major cause of the lack of housing for local people who cannot compete in the bidding system. Commitment to large scale provision of holiday homes is also a commitment to how important aspects of tourism development will take place in the Park. There is adequate experience and knowledge from tourism development in areas, such as the Alps that clearly demonstrate the social damage done by permitting large scale holiday home development in communities and of the reduction in economic wealth generated by a tourism industry emphasizing this approach.

In addition, there is increasing evidence that proposed and planned housing developments, through their scale and number, are already affecting the natural resources of the Park. Examples are the threatened impacts on semi-natural woodlands. In this respect, the UK Biodiversity Action Plan (1994) is relevant as it states the UK Government's published policies. Viz:

“p. 100, 6.48. “Action. Continue to protect ancient semi-natural woodlands and encourage forms of management which conserve their special characteristics. Encourage the extension and creation of native woodlands. Support the creation of community woodlands near population centres”

p. 163, 10.15. Policies and programmes have as their objective to maintain the present area of ancient and semi-natural woodlands; to expand the area of native woodland of a natural character...”

An additional example of the growing pressure on natural resources through excessive house building is Scottish Water's proposed increased demand on water resources from the Spey, which already sees heavy demands on its resources.

Lastly, the carbon footprint of a policy that encourages sizeable housing development based on persons or families owning two homes, is unacceptable in terms of its contribution towards climate change.

We therefore object, to the current housing policies and approach that would permit such development.

Summary

The approach is incompatible with the 1st, 2nd and 4th aims of the park. The approach seems to focus heavily on the provision of housing for holiday homes (table 2) which add little to the economy or the sense of community, whereas it should be focused on providing housing for local people. Also the scale of development proposed will have an adverse impact on the natural resources of the Park, eg semi natural woodlands and water resources. Finally the carbon footprint of such an approach is totally inappropriate.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name Goldcrest (Highland) Ltd	Company Goldcrest (Highland) Ltd	Objector Ref 445a
	Agent Ryden LLP		

Representation

Our client, Goldcrest (Highland) Ltd objects to the housing and requirement and supply as contained in Section 5 of the Cairngorms National Park Deposit Local Plan. In particular, Table 2: Housing Land Requirement Calculation on page 43 of the Deposit Local Plan should be increased. Similarly, Table 4: Phased Land Supply by Local Authority Area should be amended to make provision for additional units in Nethy Bridge. Currently in this settlement, there are no additional sites identified for residential development, only sites with existing planning consent.

Paragraph 5.37 of the Deposit Plan highlights that there is no exact measure of how many houses will be required in the future, nor any accurate method of predicting how many houses will be built during the lifetime of the Local Plan. The Planning Authority are therefore simply estimating the likely need and demand for additional houses. The Cairngorms National Park Plan 2007 highlights that the lack of access and good quality housing has been identified by many communities as a key issue facing the National Park. The lack of access to good quality affordable housing is one of the key challenges to creating and maintaining sustainable communities in the long-term,

so it is a priority to address now.

An Analysis of the Cairngorms Housing System prepared in February 2006 also indicates that significant population and household growth is anticipated in the Local Plan area over the next few years. Affordable housing is also an issue in the area due to the high proportion of second and holiday home owners which both pushes up house prices in the area and reduces the supply available to meet permanent housing need. It advises that the projected level of new supply as a whole would have to be fully devoted to Low Cost Home Ownership (LCHO) or affordable rent in order to meet the backlog of need and newly arising need. This is unrealistic and therefore the most pressing policy consideration is to bolster the supply of new housing in the Park area.

This was supported by consultations carried out which highlighted that a satisfactory amount of land must be allocated for residential development in the Local Plan. Without sufficient zoning of land for housing, supply would be further stifled, driving up demand further. Land availability was viewed as a particular constraint and some settlements had very little land for future housing land. It is considered by Goldcrest (Highland) Ltd that Nethy Bridge is such a settlement with very little land for future housing; in fact, no sites are identified for future housing.

It is therefore essential to increase the supply of new housing in the Park area and the efficient flexibility is built in to allow for uncertainty to accommodate the highest growth scenario. Accordingly, the figures in Table 2 should be increased substantially and additional sites should be identified for residential development in Nethy Bridge. This would help meet demand for housing in the area and help address the affordable housing problem.

Modifications:

Housing Land requirement to be increased in table 2 to allow for additional flexibility.

The phased land supply in table 3 relative to the highland area should be increased to make provision for additional units at Nethy Bridge.

Table 4 should be amended to include additional allocations at Nethy Bridge

Summary

Currently within Nethy Bridge no additional land has been allocated for housing development, other than that already with planning consent. To ensure an effective 5 year supply, land should therefore be allocated to meet the need. Para 5.37 acknowledges that there is no exact measure of how many houses will be required for the future, nor is there an accurate method of predicting how many houses will be built during the lifetime of the Local Plan. The CNPA has therefore simply estimating the likely need and demand for additional houses.

The Park Plan highlights the lack of access to good quality housing by many communities and identifies the need for affordable housing provision as a priority for implementation. Population estimates also indicate a significant population and growth over the next few years. Without sufficient zoning of land for housing, supply would be further stifled, driving up demand further, for example Nethy Bridge which has no sites are identified for future housing. To increase the supply of new housing in the Park area and the efficient flexibility is built in to allow for uncertainty to accommodate the highest growth scenario the figures in Table 2 should be increased substantially and

additional sites should be identified for residential development in Nethy Bridge.

Table 2 should therefore be amended to allow for additional flexibility, and table 3 amended to make provision for additional units at Nethy Bridge. Table 4 should be amended accordingly.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (land supply)	Name Alistair McLeod	Company	McLeod Building Ltd.	Objector Ref	389
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Representation

We write to express our concern on various aspects of the above and how they would affect our Company. McLeod Building Ltd is a family owned and run business and was established in Grantown on Spey in 1908. We directly employ over 30 staff all of whom are local. In addition we employ up to approximately 20 sub-contractors, again locally, to carry out various trades.

It would seem that the Local Plan will from now on favour bigger builders almost all of whom will come from outwith the Park. Smaller local companies like ourselves have always depended on land being available for smaller developments and also one-off dwellings. The smaller developments will now not be viable due to the high percentage of provision for affordable housing and one-off houses will be severally restricted, if built at all, due to the guidelines of the Plan in Policy 26.

Much more thought needs to go into both these objectives to take into account the views of the local building industry which after all is a huge contributor the economy of Badenoch and Strathspey and the wider area of the Park.

Summary

The proposals regarding house development would have an adverse impact on local small scale builders. The proposal sites should create opportunities for small scale developments to meet local needs.

CNPA analysis

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. The Plan cannot however retain certain sites to be developed by particular developers, and local developers must be reassured that there are appropriate opportunities to meet their aspirations for the life time of the Plan.

Policy Housing (land supply) **Name** Maurice Stack **Company** Aberdeenshire Council **Objector Ref** 473p

Representation

Settlement Proposals: While housing development based on a 5 year land supply as described in the plan is welcomed, ongoing analysis of population change, coupled with increasing demand for economic development opportunities, will require to be considered, as the life of the plan progresses. While conservation of the special qualities of the Park is key, the increasing awareness and attractiveness of the Park will result in greater demand for housing, plus business development to service communities over time. The Cairngorms National Park is well placed to demonstrate that social and economic sustainable development can go hand in hand with conservation and enhancement of the natural and cultural heritage combined with sustainable use of the natural resources.

Summary

While housing development based on a 5 year land supply as described in the plan is welcomed, ongoing analysis of population change, coupled with increasing demand for economic development opportunities, will require to be considered, as the life of the plan progresses. While conservation of the special qualities of the Park is key, the increasing awareness and attractiveness of the Park will result in greater demand for housing, plus business development to service communities over time. The Cairngorms National Park is well placed to demonstrate that social and economic sustainable development can go hand in hand with conservation and enhancement of the natural and cultural heritage combined with sustainable use of the natural resources

CNPA analysis

The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including creating the correct level of opportunities for employment. As a result of this consultation process further work will be undertaken to link more closely the demand for housing to economic prosperity and the need to work within the aims of the Park. This will be linked to the work ongoing relating to sustainability. (WORK WITH NATURAL HERITAGE SECTION AND ECONOMIC AND SOCIAL DEVELOPMENT SECTION)

Policy Housing (land supply) **Name** Housing and Property Services **Company** The Highland Council **Objector Ref** 471a

Representation

Welcome the proposals in principle and think that they may make a significant contribution to meeting housing needs. Look forward to working with CNP to develop the policies further so that they can be implemented effectively and also to monitoring their impact and effectiveness – important given their nature. We hope that CNP will be responsive to amending them if there is evidence that they are not helping to achieve objectives of the CNP and The Highland Council. I think there is the need to stress the need for realistic allocations of economically deliverable land due to the possible impact of restrictive policies and also the consequent impact on house prices and housing need (see comments on Table 3 etc.)

Summary

Welcome the proposals in principle and think that they may make a significant contribution to meeting housing needs. Stress the need for realistic allocations of economically deliverable land due to the possible impact of restrictive policies and also the consequent impact on house prices and housing need.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing (land supply)

Name Maurice Stack

Company Aberdeenshire Council

Objector Ref 473q

Representation

Housing Land requirement and supply.

Ballater – 250 units allocation is acceptable if a minimum of 50 units is secured for affordable housing.

Braemar – HI allocated for 20 units. Indication from owner Springfield Properties, that it won't be developed anytime soon. Is this then constrained?

H2 – 30 units

H3 – 5 units

But land requirements is looking for 70 units (table 4 p44). There seems to be a discrepancy in numbers.

Summary

There seems to be a discrepancy between the housing figures quoted for Ballater and Braemar in the housing land requirement and supply information.

CNPA analysis

The tables will be revisited to ensure they are accurate, clear and easy to understand.

Policy Housing (land supply)

Name Planning, Environment and Development

Company The Highland Council

Objector Ref 469e

Representation

The land supply for housing together with building targets at 5-yearly increments in the Badenoch and Strathspey part of the Park is set out in Table 4 (page 44). This indicates land with capacity for the medium to long term (10 year period) at 1,420 houses: breaking down as 890 additional homes to 2011 and 680 further dwellings to 2016. The overall capacity of land for housing is 2,990 homes and includes the potential for 1,500 houses at An Camas Mor (new settlement). The balance - some 1,490 houses – for the most part comprises the land allocations at undeveloped sites carried forward from the Badenoch and Strathspey Local Plan (1997).

The phasing of development in these terms appears to reflect - in part - the extent to which Scottish Water assets offer sufficient capacity and an expectation that land in the right locations is released for development at the right time and is capable of being serviced at reasonable cost. Whilst the Local Plan appears to represent a sound assessment with regard to infrastructure, this assumes that Scottish

Water will rectify present water supply constraints which limit building to 500 homes, as well as the very serious waste-water deficiencies at Grantown-on-Spey, Kingussie and Newtonmore, as part of its priorities to 2010.

Subject to such infrastructure commitments, the distribution and extent of land allocations in response to pressure and opportunity, is reasonable in numerical terms, enabling growth in all communities and an element of choice in most, provided sites are released. The land supply and phasing targets reflect the bulk of house-building over the past 25 years having taken place at the heart of Badenoch and Strathspey, that the capacity for expansion at Aviemore is diminishing, and that a new settlement at An Camas Mor needs to be activated before 2011. However, it is the release of land for development and its attractiveness to the market which will bear most significantly on local prospects. Colleagues in the Housing and Property Service have expressed significant concerns about the adequacy of the land supply should there be any risk to An Camas Mor proceeding. Any intelligence obtained by the Park Authority - that allocated land thus far not made available, will become so in the future - would be welcome. Careful monitoring of the take-up of land for development consistent with the Council's Housing Land Audit will be needed.

Whilst the above points relate to housing land allocations, it would be advantageous in a changing and fluid economy, to identify economic development land in strategic positions. Particular opportunities in the centre and south of Badenoch and Strathspey should highlight the Aviemore and An Camas Mor and Kingussie/Newtonmore axes. Whilst the take up of the more recently created sites has been tentative, a business land bank is important in responding positively to investment interest as it arises. The choice of land for other uses in these locations in particular, gives ample scope for suitable initiatives whether bespoke land allocations or provisions to integrate economic development with other activities. For development management purposes, such provisions enable restraint of damaging piecemeal pressures.

Summary

The current allocations and phasing seems to rely on Scottish Water to rectify present water supply constraints which limit building to 500 homes, as well as serious waste-water deficiencies at Grantown-on-Spey, Kingussie and Newtonmore, as part of its priorities to 2010. Subject to this, however the land allocation is reasonable in numerical terms, allowing growth in all communities and an element of choice in most. However it is the release of land for development and its attractiveness to the market which will bear most significantly on local prospects. Concern has been expressed over the reliance on An Camas Mor and reassurances that this land will become available would be welcomed. Careful monitoring of the take-up of land for development consistent with the Council's Housing Land Audit will be needed.

In addition it would be useful to identify economic development land in strategic positions. Particular reference is made to Aviemore, An Camas Mor and Kingussie/Newtonmore axes. A business land bank is important in responding positively to investment interest as it arises. The choice of land for other uses in these locations in particular, gives ample scope for suitable initiatives whether bespoke land allocations or provisions to integrate economic development with other activities. For development management purposes, such provisions enable restraint of damaging piecemeal pressures.

CNPA analysis

The comments in regard to Scottish Water are noted. The land allocations do rely on the effectiveness of An Camas Mor and further information regarding the timescales for its commencement will be sought from the landowner. In regard to the comments on

economic development land, further work is being undertaken to take such land allocations forward, in particular with the Chamber of Commerce and Business sector. (ASSISTANCE NEEDED FROM THE ECONOMIC AND SOCIAL DEVELOPMENT SECTION, CHAMBER OF COMMERCE AND BUSINESS ASSOCIATIONS)

Policy Housing (land supply) **Name** Planning, Environment and Development **Company** The Highland Council **Objector Ref** 469d

Representation

Key Forecasts

The Council's earlier representations advocated that the regeneration of communities should be founded on a balanced approach to growth in population and the economy. The Council has forwarded its most up to date projections for Badenoch and Strathspey - agreed with the "Highland Alliance" partners for the purposes of forward planning - for the Park Authority's consideration. There is merit in a more fulsome explanation of the key forecasts and the implications for the economy, which arise.

Notably, the Park Authority refers variously to population within the Park as "likely to remain constant or rise slightly" and "expected to rise" in the period to 2016. There needs to be a clear understanding about such key forecasts and their implications, since population change and economic prosperity will depend on the level of in-migration sustained and in large part, the employment and housing opportunities which support it. The Plan should explain more clearly what it is the Park Authority is aiming for.

For Badenoch and Strathspey, a modest increase in population of some 300 in this period would equate with average in-migration of some +65-70 persons per annum. This level of growth is needed to sustain the core workforce at the present level and would depend on access for residents of the Park to additional jobs, whether or not these are located within or outwith the Park.

A longer-term perspective suggests stability in the workforce over the next 20 years would require in-migration in excess of +100 persons per annum (equivalent to a net population increase of nearer 700 residents within the decade), again needing to be sustained by appropriate levels of employment.

The National Park Plan - approved in June 2007 and the Local Plan thus far - has been adjusted in response to representations lodged on behalf of the Council to reflect the importance of proximity to Inverness, the Inner Moray Firth and the A96 growth corridor as a driver for economic regeneration. This is a unique opportunity for the National Park to build upon established commuter transport services, share in such prosperity - and derive from it - a significant contribution to long term sustainability. This economic dimension therefore needs to be positively promoted in support of the land allocations and house-building aspirations brought forward. It is essential also that the opportunity to promote a position of economic advantage for local communities, is fully embraced.

Notwithstanding, the projections contained in the Plan for the Park as a whole indicate 950 additional households by 2016 (Tables 2 and 3, page 43), broadly consistent with a modest growth scenario for Badenoch and Strathspey. The "housing requirement" calculated by the Park Authority builds-in potential for a further 680 homes arising from a 50% allowance for "second homes/vacant property" and

“flexibility”, giving an overall (land) “requirement” for 1,640 additional dwellings within the Park as a whole over the next decade. The Council would normally apply a 25% “flexibility” component, raising the land capacity requirement to the equivalent of 1,780 units. Since there has been a measure of uncertainty about the deliverability of housing land in the past, an adjustment to the Plan is recommended in this respect. The reference to “EU Accession Countries” is not appropriate in this context.

Summary

The regeneration of communities should be founded on a balanced approach to growth in population and economy. There would be merit in a fuller explanation of the key forecasts and the implications for the economy. There should be a clear understanding about such key forecasts and their implications, since population change and economic prosperity will depend on the level of in-migration sustained and in large part, the employment and housing opportunities which support it. A certain level of growth is needed to sustain the core workforce at the present level and would depend on access for residents of the Park to additional jobs, whether or not these are located within or outwith the Park.

The local plan (and park plan) has been amended to reflect the importance of proximity of Inverness, the Inner Moray Firth and the A96 growth corridor as a driver for economic regeneration. The Park should build on established commuter transport services, share in prosperity and derive from it a contribution to long term sustainability. This economic dimension should be positively promoted in support of land allocations and house-building aspirations. It is essential also that the opportunity to promote a position of economic advantage for local communities, is fully embraced.

With regard to Table 2, in terms of building in a degree of flexibility into projections for growth and demand for housing, the Council would normally apply a 25% “flexibility” component, raising the land capacity requirement to the equivalent of 1,780 units. Since there has been a measure of uncertainty about the deliverability of housing land in the past, an adjustment to the Plan is recommended in this respect. The reference to “EU Accession Countries” is not appropriate in this context.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Links will be made within this to the need for a more strategic approach to employment and sustainable communities. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made. In regard to the comments on economic development land, further work is being undertaken to take such land allocations forward, in particular with the Chamber of Commerce and Business sector.

Policy Housing (need)

Name Mairi Maciver **Company** Communities Scotland

Objector Ref

025f

Representation

10. We welcome the general approach to providing housing and housing land in the Park and note the process for arriving at strategic policies in relation to housing as outlined in Section 7 of the Deposit Local Plan Strategic Environmental Assessment. We particularly welcome the removal of proposed restricted access to new housing provision, which, as stated in our letter of 28 February 2006, could adversely affect the maintenance of balanced sustainable communities.

11. If it is to be a significant criterion in assessing development proposals, "local need" requires definition; its current use in the Deposit Local Plan is confusing and potentially discriminatory and excluding.

Summary

Welcome general approach to housing land provision and comments regarding access to affordable housing. Need to include a definition of "Local Need", as its current use is confusing and potentially excluding.

CNPA analysis

Further clarification on terms used within the Plan, such as that of 'local need' will be added within the modifications.

Policy Housing (need)

Name Mrs Audrey MacKenzie **Company** Aviemore & vicinity Community Council **Objector Ref** 416h

Representation

Page 41 – 5.27 – Housing Issues in the National Park. "...Much of this demand is met through existing housing stock, but new housing can improve choice and provide for particular requirements that are not available in existing housing stock". Does it meet the needs? No. So what are they going to do about it? Empty (holiday homes) paying 90 per cent Council Tax.

5.30 – "...The limited supply of effective land has meant that in Badenoch and Strathspey in particular, fewer homes have been built..." There is plenty of land. Prices are rising because people want to come here. They should be looking at how to implement their strategy.

5.32 – "Population and household projections.... More smaller households of single persons, single parents and households of only 2 adults ... likely to lead to an increase in the number of households of between 750 and 950." This would indicate a need for smaller houses initially.

5.35 – "... the Park is unlikely to attract enough public funding to build the numbers of houses required". Who is going to build them? If it is the private developer, the gap will get wider.

Summary

How is demand calculated and how are current stock houses factored into this. Within B&S there is plenty of land allocated for development and demand is rising but the population changes indicate that more small houses should be provided. In the case of affordable houses who is going to build them.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new

housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (need) **Name** DW and IM Duncan **Company** **Objector Ref** 037g

Representation

Para 5.27 'Housing demand is related to the ability and interests of householders to fund their aspirations for housing'
It is rather ironic that the very designation of the area as a national park has led to an increase in the demand for housing both directly as a result of the requirement for housing by NP staff, the majority of whom appear to have moved in from out with the area and indirectly as a result of the supposed desirability of living within the NP area. This is clearly reflected in estate agents and developments adverts keen to promote the idea that their properties lie within the National Park. This probably adds about 10% to the asking price.

Summary

In para 5.27 it is ironic that the designation of the National Park has increased demand for housing which has added to the cost of housing.

CNPA analysis

The policies in the plan and the allocations for housing development are intended to redress the balance in house prices and the need for affordable housing across the Park. Whilst the asking prices for open market houses cannot be controlled by the CNPA the policies are designed to impact particularly on affordable homes, and provide choice for those in need of such accommodation. No modification considered necessary as a result of this representation.

Policy Housing (need) **Name** Dr A M Jones **Company** Badenoch & Strathspey Conservation Group **Objector Ref** 400g(e)

Representation

5.28 - Object to the statement "This means that many more households working in the Park have difficulty in purchasing a home than was the case previously", because this is an important and sweeping statement that is not supported by any figures or timescales. Given the amount of housing proposed in the DLP and the need for this to be properly and transparently justified, we object to statements such as this that provide the public with no means of assessing its validity.

5.30 - Object to the statement "supply of new housing has been limited in the Cairngorms National Park area in the past 5 years. The limited supply of land has meant that, in Badenoch and Strathspey in particular, fewer homes have been built than were anticipated in the Development Plan" as it is misleading and regrettably, no figures are provided in the DLP to support the statement. In fact, B&S has had the highest growth rate of any rural district in Scotland over recent decades; and the average number of houses built in B&S over

the last 5 years (2002-2006 inc) is 123 houses/year. This compares to an average of 125 houses/year envisaged in the HC Adopted Local Plan (1997) being built from 1993 to 2011.

We are concerned that what we consider to be a highly misleading statement on such an important issue to any Development Plan should be included in the DLP. Given the figures that we have presented, what were the figures used by the CNPA to arrive at their statement? It is possible to conclude that the CNPA has demonstrated a serious lack of objectivity on this crucial and central planning issue.

5.34 - We object to the statement "the increasing proportion of the population who have difficulty in accessing the open market due to its recent inflation" on the basis that it is not substantiated. We are further concerned that it is simplistic, and may be misleading.

5.35 - Object to this paragraph, because the housing requirements of the communities living and working in the Park cannot be specifically met as it is our understanding there is no means of controlling who gets a house, either social or open market. Object to "provide housing to meet everyone's needs" because it is unclear who is being referred to by 'everyone'. This requires clarification. Taken as a whole, parts of this paragraph appear to us to be potentially seriously misleading.

5.37 - Object to the omission of reference to any serious study to assess the carrying capacity of for example existing infrastructure. Gathering information on this subject would appear to be a fundamental part of the CNPA's duties given the Authority's responsibility to deliver the aims of the NP.

5.38 - Object to "improved" on grounds that this is subjective and can be viewed as biased, and that it is not specified what the improvement is. An improved housing supply can be viewed as directly associated with a degradation of other aspects of the NP, such as landscape and recreational opportunities. Object to "communities of the Park" on grounds of lack of clarity. Development is by no means a clear improvement for communities of the Park.

Tables 2, 3 and 4 and 5.39 - Object to figure for household growth of 950. No rigorous explanation as to how this figure is derived is provided in the DLP, and no reasoned justification is provided for taking a higher rather than a mid way or lower estimate.

Object to figure of 1640 houses being used. The justification for this figure is not coherently argued

Object to the appropriateness of an upper figure being used without an acceptable justification. Object to reference to "backlog of demand for housing from recent years" as unsubstantiated and potentially misleading (see earlier comments under 5.30).

No reliable data to support this claim and a possible allied controversial assumption that everyone should have a right to have housing wherever they want in a NP in a manner not possible say in a Scottish city are provided (see Sunday Times Sept 07).

There is not reliable data on workers from EU accession countries and significant uncertainty about how long they are going to stay and on their housing aspirations. Some predictions are apparently that present levels of immigration are likely to be temporary. No justification is provided as to why housing for EU workers should be particularly provided within a NP.

We object to a 50% allocation of second homes and vacant property as this is inconsistent in significant respects with the aims of the NP.

Object to CNPA inferring that the DLP should seek to meet “demand”.

Object that the figures in the Tables appear to have been calculated without any reference to the natural and cultural heritage, yet development inevitably impacts on these. This is not in accordance with the Park Plan, which emphasises the importance of working towards all four aims of the NP.

Summary

Para 5.28 – Sweeping statements regarding need should be fully substantiated.

Para 5.30 – B&S has seen the highest growth rate of any rural district in Scotland over recent decades and the text is therefore misleading. What were the figures used by the CNPA to arrive at their statement?

Para 5.34 - Sweeping statements regarding need should be fully substantiated.

Para 5.35 – The statement is misleading as there is no means of controlling who gets a house, either social or open market.

Who is referred to in “provide housing to meet everyone’s needs”? Again this is misleading.

Para 5.37 – There should be reference to any serious study to assess the carrying capacity of things like existing infrastructure, basic info that would inform the delivery of the aims of the park plan.

Para 5.38 - “improved” is too subjective. An improved housing supply may be at the expense of other aspects of the Park such as landscape and recreational opportunities. “Communities of the Park” is unclear. Development is by no means a clear improvement for communities of the Park.

Tables 2, 3 and 4 and 5.39 - Object to figure as there is no rigorous explanation as to how this figure is derived, and no reasoned justification is provided for taking a higher rather than a mid way or lower estimate.

Throughout the arguments are not coherently explained. Statements are included without any supporting justification and are misleading and information is included in part without full explanation of where the data is sourced.

The allocation for affordable houses is inconsistent in significant respects with the aims of the NP. The Plan should not be seeking to meet ‘demand’. Also figures calculated have not taken into account natural and cultural heritage requirements of the 1st aim of the Park.

CNPA analysis

The comments regarding unsupported statements throughout the text are noted. In the modifications it is hoped to address such situations. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use. In terms of housing land requirement and land supply, a detailed paper will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Modifications will also endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the special qualities of the area as identified as a National Park. The wording used within policies throughout will be

clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use.

Policy Housing (need)	Name D Scobbie	Company	Objector Ref	458
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Representation

Comments on the Introduction.

The combination of natural and cultural heritage will fail. The majority of people taking up the majority of homes will know nothing of the area's cultural heritage, indeed many will seek to introduce their own concept of culture. It should be a priority to retain local people who do know and appreciate the cultural heritage. Planned housing developments will neither maintain the Park's distinctive character or its coherent identity. It may even destroy many of these assets. An example is the architecturally disastrous housing developments in Aviemore. These appear to be an amalgam of Disneyland and Balymory designed by architects to whom the concept of vernacular architecture means a strip of Fifestone or a blue, green or ochre frontage.

General Comments

"Meeting the special needs of the area and be the best means of ensuring that the Park aims are collectively achieved in relation to the area in a coordinated way" It appears that the special needs of the area are more open-market housing and many more people. What is driving this demand? I find little justification for this policy in the Plan. For years it has been obvious that the prime requirement in the Park area - as in most of Scotland - is affordable housing to enable local young people to stay and work in their own home area. It is a clear and undeniable requirement yet the ratio of affordable to open market housing is poor, some 20 to 25 percent of planned build. The Plan lists the number of houses that could be built in 14 towns and villages but only in Carrbridge is the number of affordable houses mentioned (89 open market and 28 affordable).

My percentage may not be accurate but the proposed development in Grantown on Spey gives a similar figure. So demand for 75% of planned houses comes from outwith the Park. Even allowing for a reasonable percentage being generated from existing residents wishing to upgrade or move (thus freeing more existing housing stock) it can be assumed that the Plan anticipates and is committed to a very large increase of population. I repeat my earlier question, what is generating this demand? At 5.21 the Plan states that the proposed delivery of housing is to meet the needs of the communities in CNP. I doubt very much that existing communities are clamouring for housing other than affordable housing and I trust that the CNP Board can produce evidence to justify the proposed construction of so many open market houses. At 5.24 there is a list of strategic objectives one of which is to increase the accessibility of rented and owned houses to meet the economic and social needs of existing communities. If so, will the percentage of affordable houses satisfy this demand? It appears that CNP can gauge the percentage required within a few percent but what exactly is generating demand for the other 75% percent of open market housing? The Plan is somewhat vague in this area.

Naturally people want to move into national park areas. Anyone who has driven from Manchester to the Lake District on a Friday night can speak of the endless traffic tailbacks that vanish when past the Lakes' slip roads. Fortunately, England has more demanding regulations to prevent inappropriate development. There is sufficient evidence to indicate that, throughout the Park area, a large

proportion of the housing stock is used as present or future retirement homes, second homes, holiday homes, buy and wait, buy and lease or purely speculative purchase. None of these uses meets the professed aims and principles set out in the Introduction and it is highly likely that the same pattern of ownership will be repeated in future. None of these reasons for purchase add real value to the life and sustainability of the Park, in fact they merely add to demand for water, power and other services to be provided by the respective regional councils and agencies such as SWS. They do, however, provide attractive investment opportunities for large construction companies, non residents and property speculators.

The employment of large out-of-area construction companies who will import out-of- area workers will destroy the smaller, local construction firms currently providing long term sustainability to a fair proportion of the Park communities.

Substantial increase in population will attract the big chain stores that will eliminate the smaller shops in the villages and small towns. In time altering the ambiance of these settlements. The very things that tourists find attractive in the smaller villages will metamorphose into a series of cheap souvenir sellers and fast food outlets. Again, Aviemore is a good example.

Despite the new Plan's laudable attention to minimising the effects of climate change and carbon footprint, one can anticipate an average of one car per house. Unfortunately, there is a tendency for newcomers to purchase one of the larger 4-wheel drive versions, presumably to deal with severe winters now long gone. A subsidiary effect is to increase demand for parking spaces and car parks thus reducing available space particularly in the smaller settlements. Examples of this problem can be seen on any day in Newtonmore, Kingussie, Aviemore and Grantown on Spey.

I note that SWS is to provide Newtonmore with a long awaited upgrade to the waste water treatment plant at a cost of 3.5 million pounds. In 2009 up to 120 more houses will be able to connect to the public sewerage supply. Unfortunately, this is 100 fewer houses than are planned for Newtonmore. Presumably another upgrade will be required, perhaps costing only 2.5 million. SWS intend to upgrade facilities at Grantown (which is to have another 235 houses) possibly at twice the cost of the Newtonmore works. If one extrapolates this level of expenditure and applies it to other communities with similar problems (nearly all) the total sum is enormous and effluent handling is only one aspect of the infrastructure shortfall. Water supply is a case in point. SWS have already expressed concern about the inadequacy of the current supply and I understand there is a proposal to take water from the Spey. Should the proposals in the Plan be adopted it appears that Cairngorms National Park will become (concurrently with the conversion of the A9 to dual carriageway, the installation of a new power supply system [under or over ground], and the efforts of SWS and other agencies) a gigantic building site condemning its inhabitants to a decade of noise, dust, mud, huge lorries and total inconvenience One begins to understand why Scottish Government is expressing doubts about the competence of appointees to boards of National Parks. The Plan covers anticipated development in the Park over the next five years. Assuming the proposals are adopted, there will be a very large increase in open market housing, far beyond the capacities of existing infrastructure and apparently driven by unspecified demand. As it stands, the Plan appears to be a competently constructed wish list dealing adequately with a multitude of subsidiary matters. It does not address major concerns ,for instance it refers to healthcare facilities and care services in two sentences which place responsibility on the relevant NT-IS Trusts As the originating authority for unprecedented population expansion one would expect CNPA to consider this matter in more detail. There will be a major increase in the percentage of older people living in the Park and, while NHS has responsibility for some aspects of these matters, it is the appropriate councils that are responsible for the greatest part. In this case

Highland Council Social Work Department. The Social Work Department is already overworked, understaffed and financially embarrassed. It is already committed to major undertakings throughout the life of the Plan. I am confident that they will be delighted to learn that CNPA intends to add so many people to their area of responsibility. So too will the people of Highland Region who will undoubtedly pay the price in increased Council Tax. I assume the same principle applies to suppliers of other infrastructure services. Additionally, the Plan does not consider the effect of proximity to Inverness - the fastest growing city in the UK. As has happened in England, many villages and small towns have become dormitory areas denuded of all local inhabitants and local facilities. The fact that CNP should be to some extent, protected from such depredation is yet to be demonstrated. In UK terms the commuter distance to Inverness is quite short and the A9 will be upgraded to dual carriageway. Deeside, Badenoch and Strathspey are prime dormitory territory and, despite the safeguards listed in the Plan, the Board has yet to withstand the full weight of commercial, political and financial pressures and other inducements masquerading as pragmatism that will be exerted in future. On current performance I doubt if it is competent to do so. I have little doubt that in 25 years time the real "Park" will be considerably smaller.

CNPA has to meet many EU and UK requirements but one pivotal requirement should be noted; it is required to maintain the local quality of life. This Plan does not fulfil that requirement, in terms of housing provision it may well achieve the opposite. It will, however, make things easier for horses (Action Programme 2007-2012, para 1h)

SUGGESTED MODIFICATIONS TO RESOLVE OBJECTIONS

1. CNPA should reconsider their priorities in housing provision. Construction of affordable housing for local people should be given priority and the proportion of affordable houses to open market houses should be increased initially to over 50% until demand has been fulfilled. Any subcontracting of affordable housing must go to local firms
2. If not already available, a study should be made to identify specific areas in which demand for affordable housing is greatest.
3. Very large (over 50 houses) projects should be subject to staged construction over a minimum 5 year period.
4. All housing developments should be phased to coincide with the completion of all essential infrastructure projects. Examples are water, drainage, effluent and power.
5. Local construction companies and suppliers must be utilised to the maximum extent possible including combination for large projects.
6. Speculative building should be banned and construction limited to areas able to demonstrate a clear, valid and proven demand.
7. The Plan contains a number of issues that require clarification. The outstanding deficiency is failure to consider the cumulative effect of all the proposals.

SUGGESTED MODIFICATIONS TO RESOLVE OBJECTIONS

1. CNPA should reconsider their priorities in housing provision. Construction of affordable homes for local people should be given priority and the proportion of affordable homes to open market homes should be increased.
2. If not already completed, a study should be made to identify specific areas in which demand for affordable homes is greatest.
3. Very large (over 50 houses) developments should be subject to staged construction over a 5 year period although access roads and sub-surface utility connections can be completed during initial construction.
6. All housing developments should be phased to coincide with the completion of essential infrastructure projects. Examples are water,

effluent and power supplies.

7. Local construction companies and suppliers should be utilised to the maximum possible extent.

8. Speculative building should be banned and construction limited to areas demonstrating clear and valid demand for housing. CNPA must either reduce the number of open market houses or spread the intended development over a minimum of 20 years.

9. The Plan contains a number of issues that require clarification.

Summary

There should be a presumption in favour of retaining local people in the area who appreciate the cultural heritage of the Park. The proposed level of housing will do nothing to support this and will destroy many of the Park's assets. What is driving the demand for the level of housing, there is little justification in the Plan. Where figures are specifically mentioned for the provision of affordable houses in settlements the indication is a level of 25% (eg Carrbridge), which implies a level of 75% open market houses. Where are all these people going to come from, even allowing for a number of people within the area wishing to upgrade or move house. There seems to be some justification for the need for affordable homes but none on the remainder of the houses to be provided as open market development. The provision should not be for retirement/second/holiday/investment homes or homes for people commuting to Inverness, which add little to the economy. The level of construction proposed will result in the need for out of out-of-area contractors, again putting nothing back into the local economy. Increases in population will also attract chain and non local shops, again destroying the cultural heritage of the area. It will have an adverse impact on climate change despite other aims mentioned in the Plan.

There is also an issue with infrastructure provision to support the level of construction, including water, waste, hospitals, schools etc. The intended levels of upgrade do not seem to match with the projected level of demand.

Suggested modification –

- the housing allocation should be reconsidered, with construction of affordable houses for local people given priority, provided at a level over 50% until demand has been fulfilled. Houses should be built by local builders.

The actual demand for such affordable housing should be assessed accurately to ensure provision is made in the correct areas. Where developments exceed 50 houses, developments should be staged over at least 5 years and should coincide with all essential infrastructure projects. Speculative building should be banned, and development should only be allowed where there is a demonstrable need. The cumulative impacts of the levels of development should also be assessed.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (need)	Name James and Evelyn Sunley	Company	Objector Ref	056m
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Representation

5.27/5.41 The Park plan is again guilty of forming policy for the Park as a whole when in fact the affordable housing needs and housing development market potential are quite different in Ballater than in other settlements in the Park. The number of affordable houses required in Ballater for LOCAL PEOPLE and for commercial employment needs has not been established. It should not be the function of the CNP or the Park Plan to be used as a vehicle for the Scottish Executive to solve the housing shortages in other parts of Scotland.

Summary

The number of affordable housing units needed in different parts of the Park are not comparable and the plan needs to identify how many LOCAL people need accommodation and employment.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing (need)	Name John Davison	Company	Objector Ref	344
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Representation

Where one arrives AT depends upon where one is coming FROM. You choose to start the debate from the basis of all those listed paragraphs of the draft Deposit plan – a welter of ambitious, often conflicting, aims, a recipe for endless prioritising debate. I choose to start from a much more secure and single basis:

Although the 4 aims of the Park are expressed in woolly intangible phrases (with the word 'housing' not even included), the intention in setting up the park was clearly stated at the beginning by the then Minister responsible, Sam Galbraith, that it "should become an icon of peace and beauty". However that phrase is interpreted, and despite MOD warplanes still practicing overhead, it is clear that the intention was that the Park should be something very DIFFERENT from non-park. If not different, what is the point of setting up a Park, with all the money spent and travail involved in so doing?

But if we look at housing development in north Aviemore today, can one see any difference to development going on around Inverness City? In both, industrial housing juggernauts are moving in to create huge suburban sprawls. Such developments are totally inappropriate adjuncts to Highland villages, whose character is thereby destroyed by the size, shape and uniformity of the attached schemes. Yet the deposit plan envisages / licences ever more such housing developments coming in to attach themselves to villages. Once set in motion, the juggernauts need to be fed, to gobble up ever more land. And for what? Just to spew out more profit for

landowners and developers?

Who are all these houses for? The builders are only really interested in the free market 50% that can be sold to retirees, as holiday homes, to buy-to-rent speculators. The Park want 50% to be so-called affordable, so that young artisans can be on hand to provide the services the other 50% will require from demographic change. This argument is so flawed: it completely ignores the amazing mobility of labour. As many working people are probably commuting TO Inverness as are currently commuting FROM. And what is going to happen at the end of 5 years? The next tranches of land sacrificed to feed the greed of developers? The same process of concreting over ever more of the strath, taking in the last few villages as yet undamaged: Drumguish, Insh, Laggan, Dulnain Bridge??

Your deposit plan assumes continued growth and stability in the housing market. Perhaps the Seventh cavalry are appearing even now over the hill – a pattern change occurring, not as a result of any CNPB debate or decision-making, but by market forces: a sudden collapse in the housing market. If/when houses prices suddenly drop 25%, you won't see these developers for the dust created by their rapid EXIT!

Summary

Housing in Aviemore is not in accordance with the aims or intentions of the Park. Who are all the houses for? The proposals are completely unsustainable. And where will it end - looking at the other unspoilt villages in the Strath.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Representation

Housing pp 41-52; including Policies 23-9. Mixed housing development and the sustainable balance of affordable and open markets is more likely to be successful when there is local housing for local people. The latest figures of stated requirements are about 60 small rented and under 40 units for affordable purchase as above. It does not seem possible to produce the balance in the Plan without bringing in a dangerously disrupting change of population and financial problems if we discuss that as 50 or 30% of development. Inclusion of private and play spaces must be balanced also by accommodation for those who do not want to garden and allotments for those who prefer that kind of separate cultivation. It should be possible to have walkways separate from heavy traffic so that children may move safely and visibly about their activities. It is helpful to have easy access to Planners for discussion for people who wish to have small developments especially if it is not considered desirable to have open discussion of the sums required as contribution before plans are in more than the concept stage. The Sustainable Design Guide should emphasize sound insulation as well as heat and general energy sustainability so that quiet, large flats are a feasible possibility in a bagpipe-playing area. Also garages underneath as a protection against flooding on the 1:200 year plain OR moving uphill. There is nothing firm here about heat exchanges or geothermal. We are not sure that more houses on severely as they are now or in Policy 28. Rural businesses might benefit from isolation. The Plan intends to identify sites and land for development over a five year period. Whilst we accept that this Local plan is intended for this length of time, the development of land for housing in Ballater has to be over a much longer period. I await the Green Paper in October.

Summary

The provision of mixed and affordable housing should be to meet the local demand and the levels proposed should not cause disruption to the character of settlements and communities. Play and other open space must be included in the design of all development to meet everyone's needs. All proposals should be discussed with planners before they submit applications. The design guide should emphasize the importance of insulation and energy use. The allocations should also extend beyond 5 years to allow for a more planned approach.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. This will be done in conjunction with the ongoing work on sustainability within the Park, including promoting sustainable communities. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Representation

I am writing to express my concern about the unsustainable growth envisaged in the Deposit Local Plan. I understand the need for more housing for those living and working in the Highlands, especially the need for affordable housing for local people but to make an allowance for the predicted demand for second homes is inexcusable. Second homes add little to the life and the economy of the Highlands with many standing empty for a large proportion of the year. They contribute little to the social or financial fabric of the area, keep property prices high and keep property unavailable for local people. I know this too well as I have found it very difficult in the recent past to find anywhere to live in Newtonmore, and had to resort to living in a caravan and holiday cottage for periods of time while second homes stand empty and unused. It is also a very difficult situation for others in a similar situation.

I feel strongly that the current Deposit Local Plan can only make this problem worse and make houses more and more unaffordable for local people. The irony is that more and more building will ultimately detract from the beauty and desirability of the area. Surely the CNPA is meant to promote sustainable development of the area and protect a sensitive area rather than allowing itself to be controlled by market forces. I implore you to review your current policy and protect this beautiful area and promote affordable housing for those who live and work here keeping the place alive rather than just a theme park for the tourists.

Summary

The local plan should not be making any provision for the development of second homes which add little to the economy and exacerbate house price rises. The policies should promote sustainable communities and protect the special qualities of the Park.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Representation

The following comments and response to the Deposit Local Plan by the Ballater and Crathie Community Council have been prepared by the Council after consultation with the local community. Our comments are confined to matters having a bearing on the communities within our Community Council area.

The Park should note that the Community Council is in full support of the future development outline for Ballater, as proposed by the Prince's Foundation. These proposals have been received with widespread enthusiasm and have the support of the local population.

1. The Local Plan concentrates more on the methods of producing affordable housing without first proposing methods of encouraging business incentives (i.e. rates relief, tax incentives, etc.) to first create the employment that in turn creates the need for the additional housing the Plan proposes. In addition, the Plan makes little comment on the need for sustaining the existing infrastructure as well as necessary new infrastructure such as schools, shopping and medical facilities etc to support the needs of the 250 housing units proposed. Affordable housing needs are directly linked to the requirements of full time employment in the area.

Summary

The plan focuses too heavily to housing provision and not enough on employment opportunities and incentives. Also there is little focus on the need to provide adequate infrastructure to support new housing development. All these should be intrinsically linked.

CNPA analysis

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities, allocation of land for services to support this including creating the appropriate level of opportunities for employment growth, and the protection of the special qualities of the area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use. As a result of this consultation process further work will be undertaken to link more closely the demand for housing to economic prosperity and the need to work within the aims of the Park. This will be linked to the work ongoing relating to sustainability. (WORK WITH NATURAL HERITAGE SECTION AND ECONOMIC AND SOCIAL DEVELOPMENT SECTION)

Policy Housing (Sustainable Communities) **Name** Robert Maund **Company** Scottish Council for National Parks **Objector Ref**434i

Representation

Sustainable Communities

In common with many of the more remote rural areas, the Park has problem of settlements which have a high proportion of second homes due to the attractiveness of the area and a shortage of affordable homes for people who live or work in the Park.

A high proportion of second homes can have a damaging effect on the viability of communities and local businesses. Whilst the situation in respect of existing housing stock has developed over a period of time and has been inherited by the Park Authority, it is clearly important to try to address the problem through the local plan as far as new development is concerned. Priority must be given to the needs of existing communities rather than new build open market housing which is likely to be too expensive for most local people and cater for second homes and commuters to urban centres.

Summary

It is important that the plan should try and address the problems of affordable housing and second homes. Priority must be given to the needs of existing communities rather than new build open market housing which is likely to be too expensive for most local people and cater for second homes and commuters.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared

to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing Table 2 **Name** Mairi Maciver **Company** Communities Scotland **Objector Ref** 025k

Representation

17. The figures in para 5.39 and Table 2, Table 3 and Table 4 are not sourced - we understand Table 2 is based on population projections produced by Centre for Census and Survey Research (the Manchester Study) and the Heriot-Watt Housing Systems Analysis 2005. If this is the case, these sources should be included in the text, as should sources for the information in Table 3 and Table 4. We also suggest amending the wording in Table 2 under 1. Household projection to read "...to reflect both the backlog of existing demand for housing from recent years, changes in household structure and inward migration." As regards the level of need indicated by Table 2, given Heriot-Watt's suggestion that the net need for additional affordable housing is 132 units per year over the Plan period, it appears that insufficient land supply has been allocated to meet this need. Land allocations in the Plan should be sufficient to meet all need.

Summary

The sourcing of the figures used in Table 2,3 and 4 and para 5.39 should be added. The wording in Table 2 should be amended to ".. to reflect both the backlog of existing demand for housing from recent years, changes in household structure and inward migration." Regarding the need identified in Table 2, given Heriot-Watt's suggestion that the net need for additional affordable housing is 132 units per year over the Plan period, it appears that insufficient land supply has been allocated to meet this need. Land allocations in the Plan should be sufficient to meet all need.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing Table 2 **Name** Housing and Property Services **Company** The Highland Council **Objector Ref** 471c

Representation

Table 2
 Whilst we agree that future projections include projections for in-migration (as well as backlog) we can see no reason why workers from

the EU Accession Countries are specifically mentioned and are concerned that this may contribute to a negative view and anxiety by individuals and communities re. particular ethnic minority groups.

Summary

Agree that future projections include projections for in-migration (as well as backlog) we can see no reason why workers from the EU Accession Countries are specifically mentioned and are concerned that this may contribute to a negative view and anxiety by individuals and communities re. particular ethnic minority groups.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing Table 2	Name M T Collings	Company	Objector Ref	395d
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Representation

2(b) is inconsistent with provisions of low cost housing for local residents. Net immigration within Strathspey is for retired persons who are most economically unproductive. (Word illegible) labour is unable to service all their needs and low paid EU labour is recruited increasing the need for low cost housing. Table 4 even omitting An Camus Mor indicates a disproportionate preponderance of housing within Strathspey with no commensurate infrastructure enhancement.

Modification to resolve this objection – the 50% loading of holiday homes should be removed as environmentally destructive and socially derisive.

Policy 24 should not apply planning gain to local people trying to build their own homes, a premium on their single build low cost home would prevent it being low cost. Planning conditions should be imposed to make good the required protection .

Summary

The provision for holiday/second homes in table 2 is inconsistent with provisions of low cost housing for local residents and should be removed from the table. Also the provision for housing in strathspey is not met by an appropriate level of employment opportunities to encourage balanced communities.

The requirement for single house builders to make a contribution to affordable housing should also be removed as it removes the low cost of such a building option.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new

housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. In addition the review will consider the impact of the policies in the plan on single house builders to ensure the outcome will be in line with community aspirations. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing Table 2	Name Phillip John Swan	Company	Objector Ref	462a
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Representation

Table 2
 This objection relates to Section 5, Table 2, 'Housing land requirement calculation' and Table 3, 'Phased land supply by local authority', page 43. The basis of total housing requirement for the Park, as estimated, seems excessive. Specifically, the 50 per cent allowance for second homes and vacant property, plus 15 per cent for 'uncertainty', on top of a base figure that already looks generous, leads to an unnecessarily high commitment for new development more than 70 per cent above the best available realistic estimate. Requested change: to revert to the household projection figure of 950 units as a realistic total requirement.

Summary

The basis of the total housing requirement for the park seems excessive, being more than 70% above the best available realistic estimate. Plan should revert to the household projection figure of 950 units as a realistic total requirement.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing Table 3	Name Simon Blackett	Company	Invercauld Estate	Objector Ref	442c
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Representation

We question whether you have allowed enough units in either the 5 or 10 year period to fund the necessary infrastructure and affordable housing.

Summary

Does the allocation in Table 3 for either the 5 or 10 year period provide adequate development to fund the necessary infrastructure and

affordable housing.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. This will include reference to the necessary infrastructure and any constraints as a result thereof. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing - Table 3 **Name** Mairi Maciver **Company** Communities Scotland **Objector Ref** 025l

Representation

18. Table 3 on page 43 would be clearer if columns were entitled 0-5 years and 5-10 years, if this is what is meant.

Summary

Table 3 should be clearer with columns labelled 0-5 years and 5-10 years, if this is what is meant.

CNPA analysis

The titles used in the table will be reviewed to ensure clarity and easy understanding.

Policy Housing - table 4 **Name** Anne MacNamara, Planning Directorate **Company** Scottish Government **Objector Ref** 423k

Representation

There is an inconsistency in the housing numbers proposed for Aviemore in Table 4 and on page 62. Table 4 specifies a total 10 year target of 300, whereas the total for proposals AV/H1, AV/H2 and AV/H3 is 200.

Modifications to resolve this objection - The Local Plan should be modified to remove inconsistencies in housing numbers in Table 4 and elsewhere in the Plan.

Summary

The figures in Table 4 are inconsistent with the proposed numbers in the settlements section. This should be corrected.

CNPA analysis

The calculations will be cross checked and any inconsistencies corrected.

Policy Housing Table 4 **Name** Dominic Fairlie **Company** Scotia Homes Ltd **Objector Ref** 452h

Representation

Capacity numbers for Ballater

The Princes Foundation for the Built Environment undertook a series of workshops in 2006 examining the growth for Ballater. This work goes a considerable way towards meeting many of the plans objectives in terms of creating a place with a mix of uses and a mix of tenures. Good design is a major part of this, and so too is the potential to use local materials in the building work. The draft plan is also very keen to ensure the provision of affordable housing and specifically mentions up to 50% of any development being affordable (Policy 24 on page 46). Taking all of this together is going to make the delivery very difficult unless enough development is allocated in order to pay for it. It would seem to make sense therefore for the plan to be less prescriptive in terms of the capacity for development at Ballater.

Modifications:

An objective of the plan should be to seek to get well designed places actually delivered, and it should be flexible enough to encourage this. Part of this will be to ensure that enough development is allowed, and in the right timescale, to find the total requirements of infrastructure, use of local materials, high quality design and affordable housing. Clause 7.7 on page 59 goes some way towards introducing flexibility with regard to site capacities as it relates to the maps. Other clauses (for example 5.54 on page 47) also seem to address this when it allows the planning authority to “take into account any particular site constraints or conditions” that would alter then affordable housing contribution.

In the absence of any real flexibility, where Table 4 refers to Ballater and an allocation of 90 units in the 0-5 year period, this is probably too small for the development, as envisaged, to be viable. It is not possible to be precise (yet) as to the amount of development that may be required, but it would appear that the desire for a well designed place and the high percentage of affordable housing will make a successful development difficult to deliver with essentially only 45 open market, relatively small, houses in the first 5 years of the plan.

Some flexibility therefore needs to be given to the authority to accelerate development where this may be needed in order to ensure its delivery.

Summary

The plan should be less prescriptive in terms of the housing capacity for development in Ballater, to take into account the work done by the Princes Foundation, which tries to balance good design, a mix of tenures, affordable housing and use of local materials. The proposed allocation in table 4 of 90 units in 0-5 years is probably too small for the development to be viable. It is not possible to be precise (yet) as to the amount of development that may be required, but it would appear that the desire for a well designed place and the high percentage of affordable housing will make a successful development difficult to deliver with essentially only 45 open market, relatively small, houses in the first 5 years of the plan. The table and the approach needs to be amended to become more flexible.

CNPA analysis

The allocated site at Ballater will be reviewed in light of additional information being sought from the Prince's Foundation. Additional information may then be added to reflect the findings of this study and provide a level of detail regarding degrees of flexibility within the site, mixed uses, access, densities, and areas to be protected from development. Further consultation will then be required within the

community to assess the level of support for any modifications. The addition of extra information may impact both on the SEA and the Flood Risk Assessment for the site.

Policy Housing Table 4	Name Phillip John Swan	Company	Objector Ref 462b
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Representation

This objection relates to Section 5, Table 4, 'Phased land supply by local authority area', page 44 (Ballater data specifically). The proposed number of 250 homes for Ballater seems grossly over-estimated; I believe the real foreseeable number of new homes, required to serve the needs of all legitimate 'stakeholders' in Ballater is around 30-40 units, of affordable housing. This could be achieved by means of intelligent infill developments and upgrading/conversion of existing properties. Over-estimating Ballater's future housing requirements as done in the plan will lead to a number of possible problems in the future, including:

- Natural uptake will be lower than planned, leaving many houses empty for lengthy periods and likely targets for vandalism;

- Large numbers of new residents living in affordable housing will not be required for local employment (because the true size of the future labour market is much lower than 250 new homes would be able to service) and this would lead to social problems associated with increased numbers of long-term unemployment.

Requested change: to reduce the target number of new homes from 250 to around 50 units.

Summary

The proposed number of new homes for Ballater is too high. Suggest 30-40 affordable housing units would be sufficient to serve legitimate needs. This could be achieved through infill and upgrading / conversion of existing properties. Overestimates of Ballater's housing requirement could lead to lower than planned uptake hence properties being left empty and targets for vandalism, and secondly, there would not be enough employment for all the new homes, leading to increased number of long term unemployed.

Seek change of target from 250 to around 50 homes.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. In particular reference to Ballater, the allocation will be reviewed in light of additional information being sought from the Prince's Foundation. Additional information may then be added to reflect the findings of this study and provide a level of detail regarding mixed uses, access, densities, and areas to be protected from development.

Policy Housing Table 4	Name Housing and Property Services	Company The Highland Council	Objector Ref 471e
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Representation

Basic calculations for Highland Badenoch & Strathspey estimate that, as long as affordable housing investment does not drop significantly, based on past trends there is likely to be subsidy available to support the 50% affordable housing target.

Summary

Comment made that as long as affordable housing investment does not drop significantly, there is likely to be subsidy available to support the 50% affordable housing target.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Housing Table 4 **Name** Mrs Audrey MacKenzie **Company** Aviemore & vicinity Community Council **Objector Ref** 416i

Representation

Page 43/44 – Table 4

Questions were raised about the accuracy of the figures particularly for Aviemore. The fourth Local Authority, Angus/Tayside is not mentioned. Identify where the figures come because they do not correspond with the information available locally, nor do they correspond with the web site figures.

Summary

How were the figures calculated. The sources should be included so that they can be checked.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made

Policy Housing Tables 2-4 **Name** Glenmore Properties Ltd **Company** Glenmore Properties Ltd **Objector Ref** 453b
Agent Steve Crawford

Representation

Housing Policy and Allocations (incl. Tables 2, 3 and 4)

Table 2 on page 43 indicates, broadly, how the numbers have been calculated. This basically takes the upper household projection of 950 units (note: this is a projection rather than a forecast. Projections extend past trends ...forecasts take past trends and apply a subjective set of assumptions to create future development scenarios), adds a 50% allowance for second homes and vacant property and, as required by SPP3, include a flexibility allowance. In this case the flexibility allowance is 15%. The total additional household figure is calculated to be 1,639 units to 2016.

This calculation, although it is difficult to tell from the information provided to date, seems to be based on a very low growth scenario, a low flexibility percentage and does not seem to take into account the economic factors that would help the National Park achieve its aims and vision. Nor does it take into account the 132 units of affordable housing expected every year. The Housing Strategy and allocations, therefore, are key concerns for Glenmore Properties Ltd.

Modifications: Housing allocations seem to be low so should be increased and the assumptions/background information made available to allow for a full debate.

Summary

The calculations provided in table 2 seem to be based on a very low growth scenario, a low flexibility percentage and does not seem to take into account the economic factors that would help the National Park achieve its aims and vision. Nor does it take into account the 132 units of affordable housing expected every year. The allocations should therefore be increased and the assumptions/background information made available to allow for a fuller debate.

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

Policy Housing Tables 3-4 **Name** Housing and Property Services **Company** The Highland Council **Objector Ref** 471d

Representation

The land supply calculation appears to assume that 100% of the 610 and 820 requirement will become available to contribute to meeting the housing requirement albeit that the requirement calculation allows (only) 214 units of flexibility until 2016 – is this realistic given experience and past trends of land availability / economically deliverable land availability?

Summary

Questions whether or not the land supply calculations are realistic given experience and past trends of land availability / economically deliverable land availability?

CNPA analysis

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies. On completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made

Policy Housing - crofting

Name Anne MacNamara, Planning Directorate

Company Scottish Government **Objector Ref** 422o

Representation

Reference to crofting in paragraph 5.15 is somewhat hidden within text on settlement improvements and town centres and does not include reference to the potential for creation of new crofts as introduced by the Crofting Reform etc. Act 2007.

Summary

Additional clarity should be provided to the options to create additional crofts in introduced in the Crofting Reform etc. Act 2007.

CNPA analysis

The issue of crofting and development associated with it has been raised with CNPA and it is considered necessary to assess the need for a separate policy dealing with this particular form of land management within the Local Plan.

Policy Housing - outside settlements

Name Graham MacPherson

Company

Objector Ref

100

Representation

I object to the plan as a worried employer of local people within the National Park. Much of my work is with small local building firms and the areas allowed for new development within the plan are too large for small developers be able to afford. You are forcing us out of business as only the larger incoming developers can afford to buy large areas of land to build on. There appears to be little allowance for smaller businesses to develop. Apart from the business aspects, we must ensure that smaller developments go ahead within communities to keep these communities alive and keep their schools open. "Locals" are often shy about coming forward and not used to speaking publicly about their concerns however this is something you should address and not allow those who have been in the area for five minutes to decide our children's futures! We've all been to Local Plan consultations but our comments seem to be ignored.

What change(s) you are seeking in future modifications to the Local Plan which could resolve your objection: I would like to see more areas for development in and around the Cairngorms National Park. NOT large housing developments like Robertsons in Aviemore but smaller, more manageable ones.

Summary

The housing proposals favour large sites which are taken up by large scale builders. This does not allow local builders to develop any small schemes. The plan should be changed to place greater focus on small sites to meet local need

CNPA analysis

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. The Plan cannot however retain certain sites to be developed by particular developers, and local developers must be reassured that there are appropriate opportunities to meet their aspirations for the life time of the Plan.