

<b>Issue:</b>	<b>Housing – Land Supply</b>		
<b>Objector(s):</b>	Badenoch & Strathspey Conservation Group	<b>Objection ref(s):</b>	400
<b>Reporter</b>	Mr Hugh Begg		
<b>Procedure:</b>	Informal hearing - rebuttal		

## Rebuttal

- I.1 This statement provides a rebuttal to the hearing statements submitted by the Badenoch & Strathspey Conservation Group in regard to Housing Land Supply issues.
- I.2 The objector requests that paragraph 5.23 of the Deposit Local Plan is deleted because they do not consider the provision of housing (either open market or affordable housing) to contribute to their sustainability. They also argue that the need for affordable housing will rise because of allocations in the local plan leading to population increases and finally contradict this with a statement that the forecast rise in population will not translate to need for affordable housing in the last paragraph of their summary of objection.
- I.3 The CNPA points out that its approach to housing has been set by the National Park Plan (CD7.1), that the Deposit Local Plan deliberately provides land for housing for all ages and needs, and that increases in households are not only related to increases in population, but also to changes in household structures. It maintains that providing greater access to affordable and good quality housing is key to supporting the sustainability of communities. Further, the overall land supply and application of policies will provide for a range of housing to suite different needs and also allow mobility from affordable housing to open market housing.
- I.5 The objector states that in paragraph 5.33 of the Deposit Local Plan the lower household growth figure of 750 should be used as a basis for the housing land requirement because the higher 950 figure chosen favours development, does not give priority to the first aim, does not reflect current economic conditions.
- I.6 The CNPA points out that the Local Plan is intended to manage development and to increase the supply of housing. The approach taken by the Deposit Local Plan is intended to reflect the requirements of the Highland Structure Plan (CD6.2) and Cairngorms National Park Plan (CD7.1) as well as the guidance provided by SPP3 (CD2.4). The approach in the Deposit Local Plan has been to ensure a generous and flexible land supply consistent with SPP3's guidance.
- I.7 The objector is confused by the dilemma referred to in paragraph 5.34 of the Deposit Local Plan.
- I.8 The CNPA confirms for clarity that the dilemma referred to is that between the projected need for affordable housing summarised in paragraph 5.31, and the projected increase in households in the Park area referred to in paragraph 5.33.
- I.9 The objector considers that paragraph 5.35 of the Deposit Local Plan should not imply allocations for housing land meet social or economic needs of communities.
- I.10 The CNPA points out that the Local Plan is required to provide for housing land within a housing market area by SPP3 (CD2.4). Paragraph 5.35 of the Deposit Local Plan refers to both providing land for the housing market and for affordable housing, as well as referring to a hierarchy of settlements in an approach consistent with SPP3.

- I.11 The objector finds the paragraph 5.39 lacks clarity over the role of consented land supply.
- I.12 The CNPA considers that the proposed modifications to the Local Plan (CD7.28) have simplified the sections of the Deposit Local Plan dealing with housing land supply and provide sufficient clarity.
- I.13 The objector requires the CNPA to add information on habitats present in allocated sites and the National Park, and information on the number of houses and population in each settlement to Tables 2, 3, & 4 of the Deposit Local Plan (on the housing requirement and land supply).
- I.14 The CNPA points out that there is no requirement to do this.
- I.15 In the statement of case on section 5.3 of the Deposit Local Plan, the objector claims the proposed allocations of the plan do not comply with SPP17 and that the proposed scale of development is unprecedented.
- I.16 The CNPA assumes the objector refers to SPP15 Planning for Rural Development (CD2.11), rather than SPP17 Planning for Transport (CD2.12). It points out that SPP3 provides the first point of reference for housing policy, including the requirement for development plans to allocate sufficient land to meet housing requirements. The Deposit Local Plan provides for land in or beside the larger settlements with greater access to services as far as possible. It then provides for development opportunities in other rural locations in an approach that is consistent with SPP15. The proposed housing land supply of the Deposit Local Plan in Badenoch & Strathspey is not unprecedented. The sites that are allocated in the Deposit Local Plan are also allocated in the Badenoch & Strathspey Local Plan 1997 (CD6.6), and were part of the established land supply when the Highland Structure Plan 2001 (CD6.2) was prepared.
- I.17 The objector makes a general point about the quality and detail of data sets available to the CNPA to inform housing allocations and decisions.
- I.18 The CNPA responds that it uses the best data available to it to inform its decisions and that different levels of detail are appropriate at different stages in the planning process.

## **Conclusion**

- I.7 The CNPA does not consider any issues to have been raised that would lead to changes to the proposed housing land supply being required.

## **CNPA Commendation to Reporter**

- I.8 No further change is therefore considered necessary.