

<b>Issue:</b>	<b>Policy 21 – Contributions to Affordable Housing</b>		
<b>Objector(s):</b>	Rothiemurchus Estate	<b>Objection ref(s):</b>	446b
	Scotia Homes Ltd		452d

<b>Reporter</b>	Mr Hugh Begg
<b>Procedure:</b>	Informal hearing - rebuttal

## Rebuttal

- 1.1 This statement provides a rebuttal to the hearing statements submitted by Rothiemurchus Estate and Scotia Homes Ltd in regard to Policy 21 – Contributions to Affordable Housing.
- 1.2 Paragraph 4 of Rothiemurchus Estate’s statement of case states that a balanced community is one where population and tenure mix are the same as the national average.
- 1.3 The CNPA does not consider that there is evidence to support this statement and that the national average for population and tenure mix is composed of many communities with different characteristics.
- 1.4 Paragraph 7 of Rothiemurchus Estate’s statement of case assumes that Policy 21 will seek 40% of 1-3 be housing units as affordable.
- 1.5 The proposed post-inquiry modifications to Policy 21 (CD7.28) do not support this. The proposed post-inquiry modifications identify a target of between 25% and 40% depending on the financial viability of the proposals. The policy does not set a 40% contribution for An Camas Mor.
- 1.6 Rothiemurchus Estate argue in paragraph 11 of their statement of case that PAN 74 (CD4.20) outlines the benchmark 25% contribution (in para 34) and that (para 35) states a higher percentage may be sought on a specific site in exceptional circumstances.
- 1.7 This is not an accurate interpretation of PAN 74. While paragraph 34 notes that local plans can use a percentage figure and establishes a 25% benchmark, paragraph 35 refers to the developer offering, or the planning authority seeking, a higher percentage figure than that set out in local plan policy, and not the 25% benchmark referred to in paragraph 34.
- 1.8 Scotia Homes Ltd argue that 40% affordable housing contribution is undesirable and not economically practical because of the range of costs associated with development, including their own aspirations for enhanced design, as well as changes in the national economic conditions.
- 1.9 The CNPA points out that the proposed post-inquiry modifications to Policy 21 (CD7.28) do not require 40% affordable housing contributions, but seek a target of between 25% and 40% depending on financial viability.
- 1.10 Scotia homes also argue that using an appraisal of economic viability (para 10.v) that seeks to identify the appropriate level of affordable housing by incorporating all the development costs will mean that few developments will be financially viable.
- 1.11 The CNPA consider this statement to be inaccurate. The purpose of using an economic appraisal (as stated in the proposed post-inquiry modifications to Policy 21 (CD7.28)) is to allow

the CNPA and developer to identify together the level of affordable housing contribution that will be financially viable. It is explicitly about supporting the financial viability of different housing development proposals in addition to seeking appropriate levels of affordable housing.

## **Conclusion**

- I.12 The CNPA does not consider any issues to have been raised that would lead to changes to Policy 21 being required.

## **CNPA Commendation to Reporter**

- I.13 No further change is therefore considered necessary.