Issue:	Policy 22 – Housing Development within settlement boundaries		
Objector(s):	Badenoch and Strathspey Conservation Group	Objection ref(s):	400

Reporter	Mrs Jill Moody / Mr Hugh Begg
Procedure:	Informal hearing - rebuttal

## Rebuttal

- 1.1 This statement provides a rebuttal to the hearing statement submitted by the Badenoch and Strathspey Conservation Group and Scottish Council for National Parks in regards to Policy 22 – Housing Development within settlement boundaries.
- 1.2 In terms of the issues raised, in paragraph 5.54 while supporting the approach to strategic settlements, the growth does not support sustainable and vibrant communities, and objection is raised to this simplistic inference. Lose of countryside can detract from communities rather than support them.
- 1.3 In paragraph 5.60 the objection relates to the use of the phrase "ensure adequate effective land supply at all times". Limits to growth should be set at some stage, and current and proposed levels of growth are contrary to the 1<sup>st</sup> aim of the Park as well as having a negative impact on natural and cultural heritage, people's enjoyment of the Park and on the special qualities, etc. By promoting such levels of growth the plan is promoting an increased need for affordable housing in the new generation. The Plan should also clarify its future growth aspirations to indicate any extensions to settlements which may come in future plans.
- 1.4 In regard to paragraph 5.54 SPP3 (CD2.3) clearly states in paragraph 9 "The allocation of an appropriate supply of land for housing is one of the key factors in ensuring continues opportunities for housing building and influencing the delivery of housing. Alongside this, consideration of the location, quality, design and energy efficiency of new homes and housing developments is required to achieve a high-quality product and successful, sustainable communities." Paragraph 31 adds "The provision of land for housing and the timely release of that land to enable building of homes is a key component of the development plan. The broader objective of development plans, in relation to housing, is the creation of sustainable mixed communities, including the provision of quality dwellings in the right places." SPP3 page 15 goes on to explain the Scottish Government's policy regarding sustainable settlement strategies. Paragraph 62 states that "Planning authorities are encouraged to make an assessment of the opportunities for further housing development within existing settlements, focussing on previously development land and conversion of existing buildings, or a review of existing land allocations for uses other than housing, where appropriate."
- 1.5 In terms of paragraph 5.60 SPP3 between paragraphs 34-44 sets out the requirements of the Development Plan in terms of housing land allocations. Paragraph 38 celarly states that "All local development plans should allocate land on a range of sites to meet the housing land requirement up to year 10 from the predicted date of adoption, providing appropriate effective e sites in the initial phase to accommodate the require for at least 5 years, and further sites capable of becoming effective, and therefore developed, by the end of year 10."
- 1.6 The inclusion of wording to clarify that adequate effective land supply is to be provided through the plan and its future reviews is therefore considered in line with SPP3 and appropriate.

## Conclusion

1.7 The approach taken in the Local Plan supports SPP3 and the aspirations of the Government, and the Cairngorms National Park Authority therefore maintains their view as set out in the original statement of case for the hearing session.

## **CNPA** Commendation to Reporter

1.8 No further change is therefore considered necessary.