



**Cairngorms**  
National Park Authority

Ùghdarras Pàirc Nàiseanta a'  
Mhonaidh Ruaidh

Formal Board Paper 1 Annex 1.13

13 March 2026

# Paper 1

# Annex 1.13



**Cairngorms**  
National Park Authority  
Ùghdarras Pàirc Nàiseanta a'  
**Mhonaidh Ruaidh**

Liveable places

# Schedule 13: Housing

Cairngorms National Park Local Development Plan: Evidence Report

March 2026





# Schedule 13: Housing

March 2026

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## Requirements addressed in this schedule

Table 1 Information required by the Town and Country Planning (Scotland) Act 1997 (CNPA003), as amended, regarding the issue addressed in this schedule.

Section	Requirement
Section 15(1A)	The local development plan must also include targets for meeting the housing needs of people living in the part of the district to which it relates.
Section 15(5)(a)	The principal physical, cultural, [economic], [social], built heritage and environmental characteristics of the district,
Section 15(5)(c)	The size, composition, health and distribution of the population of the district,
Section 15(5)(ca)	The housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people,
Section 15(5)(cb)	The availability of land in the district for housing, including for older people and disabled people,
Section 15(5)(cc)	The desirability of allocating land for the purposes of resettlement,
Section 15(5)(cf)	The extent to which there are rural areas within the district in relation to which there has been a substantial decline in population,
Section 15(5)(f)	Any change which the planning authority think may occur in relation to any of the matters mentioned in paragraphs (a) to (eb).
Section 16(2)(a)	To take into account— <ul style="list-style-type: none"><li>i. the National Planning Framework and</li><li>ii. any local outcomes improvement plan (within the meaning of section 6 of the Community Empowerment (Scotland) Act 2015) for the part of their district to which the local development plan relates,</li><li>iii. any registered local place plan (see schedule 19) that is for the part of their district to which the local development plan relates,</li></ul>
Section 16(2)(ab)	In preparing a local development plan the planning authority are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for self-build housing.



Section	Requirement
Section 16(2)(b)	Are to have regard to such information and considerations as may be prescribed.
Section 16(2)(c)	May have regard to such other information and considerations as appear to them to be relevant.
Section 16B(3)(a)	The evidence report is to set out the planning authority's view on the matters listed in section 15(5) for land in the part of the authority's district to which the local development plan will relate,
Section 16B(3)(b)	The evidence report is to set out— <ul style="list-style-type: none"><li>i. a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area,</li><li>ii. an analysis of the extent to which the action has helped to meet those needs,</li></ul>
Section 16B(3)(c)	The evidence report is to set out— <ul style="list-style-type: none"><li>i. a summary of the action taken by the planning authority to meet the accommodation needs of Gypsies and Travellers in the authority's area,</li><li>ii. an analysis of the extent to which the action has helped to meet those needs,</li></ul>
Section 16B(3)(e)	Include such other matters as are prescribed.
Section 16B(4)(c)	The evidence report is also to include a statement on the extent to which the views expressed under paragraphs (a) and (b) have been taken into account in the report.
Section 264A	In the exercise, with respect to any land in a National Park, of any power under the planning Acts, special attention shall be paid to the desirability of exercising the power consistently with the adopted National Park Plan.

Table 2 Information required by the Town and Country Planning (Development Planning) (Scotland) Regulations 2023 (CNPA684), regarding the issue addressed in this schedule.

Regulation	Requirement
Section 9(2)(c)	The information and considerations are—



Regulation	Requirement
	any local development plan prepared for an area adjoining the local development plan area,
Regulation 9(2)(e)(xi)	The information and considerations are—  The following plans and strategies, insofar as relating to the local development plan area—  any local housing strategy,

## Links to evidence

### International documents

- CNPA002 - United Nations Sustainable Development Goals

### Legislation

- CNPA003 - Town and Country Planning (Scotland) Act 1997
- CNPA004 - National Park (Scotland) Act 2000
- CNPA005 - Planning (Scotland) Act 2019
- CNPA059 - Crofters (Scotland) Act 1993
- CNPA634 - Natural Environment (Scotland) Bill as passed

### National documents

- CNPA007 - National Performance Framework
- CNPA008 - National Planning Framework 4
- CNPA541 - Scotland's Housing Emergency motion (15 May 2024)
- CNPA542 - Chief Planner letter: planning for housing (June 2024)
- CNPA543 - Housing to 2040 (2021)
- CNPA544 - Rural and Islands Housing: Action Plan (2023)
- CNPA553 - Supporting and enabling sustainable communities: an action plan to address depopulation (2024)
- CNPA545 - National Planning Framework 4 – Minimum All-tenure housing land requirement – Cairngorms National Park Assessment Report (September 2021)
- CNPA546 - National Planning Framework 4 – Minimum All-tenure housing land requirement – Method Paper (February 2021)
- CNPA547 - Planning Circular 4 / 2025 Planning Obligations and Good Neighbour Agreements



- CNPA548 - Planning Advice Note 2 / 2010: Housing land audits
- CNPA549 - Chief Planner letter: occupancy restrictions and rural housing (November 2011)
- CNPA550 - Private Sector Rent Statistics, Scotland 2010 to 2023 (November 2023)
- CNPA551 - Short Term Lets in Scotland Licensing Scheme: Part 2. Supplementary Guidance for Licensing Authorities, Letting Agencies and Platforms (2023)
- CNPA696 - Scotland's Population Health Framework 2025 – 2035
- CNPA1288 – Gypsy / Traveller and the Planning System: Action Plan (2019)
- CNPA1289 - Local Development Plan Evidence Report – Defining Gypsies and Travellers: Analysis of Responses to Consultation (2023)
- CNPA1364 - Tackling Scotland's Housing Emergency – Housing Emergency Action Plan (2025)

## **National Park Authority documents**

- CNPA010 - Cairngorms National Park Partnership Plan 2022 – 2027
- CNPA016 - Cairngorms National Park Local Development Plan 2021
- CNPA027 - Cairngorms Youth Action Team Place Standard Tool Engagement 2024
- CNPA028 - Local Development Plan: Gypsy / Traveller Community Engagement – Cairngorms National Park, Conyach Advocacy and Engagement (June 2024)
- CNPA337 - Statistical areas used in the analysis of the Cairngorms National Park
- CNPA334 - Cairngorms National Park Local Development Plan 2021 Delivery Programme 2025
- CNPA538 - Cairngorms National Park resident and worker survey results 2024 – 2025
- CNPA595 - Cairngorms National Park commuted sums report 2024
- CNPA596 - Identifying fragile rural areas in the Cairngorms National Park 2025
- CNPA597 - Identifying fragile rural areas in the Cairngorms National Park 2025 - data
- CNPA681 - Kingussie High School Higher Criminology Students Place Standard Tool Engagement 2024
- CNPA682 - Kingussie High School S1 Geography Students Place Standard Tool Engagement 2024
- CNPA683 - Kingussie High School S3 Geography Students Place Standard Tool Engagement 2024
- CNPA833 - Cairngorms Local development plan place standard tool engagement with Kingussie High School Youth Forum 2025
- CNPA834 - Local development plan place standard tool engagement with the Cairngorms National Park Junior Rangers 2025



- CNPA1104 - Cairngorms National Park Local Development Plan engagement - gamification approach 2025
- CNPA1105 - Local Development Plan engagement – Planning Power with Cairngorms 2030
- CNPA1294 – Cairngorms National Park Local Development Plan 2021 Supplementary Guidance: Housing
- CNPA1295 – Cairngorms National Park Local Development Plan 2021 Non-statutory Guidance: Policy 3 - Design and Placemaking
- CNPA1353 - Topic: Housing - engagement version

### **Local authority documents**

- CNPA126 - The Highland Council Housing Need and Demand Assessment 2020
- CNPA1427 - The Highland Council Housing Need and Demand Assessment 2020 Appendix A Paper 2 In Year Arising Need
- CNPA192 - Cairngorm Business Barometer Q1 2024
- CNPA209 - Communities Housing Trust Housing Needs Survey Report for Blair Atholl and Struan Community Council
- CNPA237 - Badenoch and Strathspey Area Place Plan
- CNPA398 - The Highland Council Indicative Regional Spatial Strategy 2021
- CNPA410 - The Highland Council Local Housing Strategy 2023
- CNPA1365 – The Highland Council Local Housing Strategy 2023 – Appendix 2 Setting Housing Supply Targets
- CNPA411 - The Highland Council Strategic Housing Investment Plan 2026 - 2031
- CNPA412 - The Highland Council Inverness & Cromarty Firth Green Freeport Housing Supply Targets (2024)
- CNPA413 - The Highland Council Housing Land Audit 2024
- CNPA429 - The Highland Council Short term lets public register
- CNPA433 - The Highland Council Non-Statutory Short Term Let Control Area Planning Policy
- CNPA1428 – The Highland Council Short Term Let Control Area for Badenoch and Strathspey Statement of Reasons
- CNPA638 - 2024 – 2027 Highland Outcome Improvement Plan
- CNPA1091 – 2024 – 2027 Highland Outcome Improvement Plan – Delivery Plan
- CNPA1291 - Highland Housing Register Allocations Monitoring Report 2024 / 25 (The Highland Council Housing and Property committee version, 13 August 2025)
- CNPA566 - Badenoch and Strathspey Housing Needs Survey 2021
- CNPA567 - Aberdeen City and Aberdeenshire Housing Needs & Demand Assessment 3 2023 - 2028



- CNPA568 - Aberdeenshire Council Local Housing Strategy 2024 – 2029
- CNPA569 - Aberdeenshire Council Local Housing Strategy 2024 – 2029: Appendix 2 Housing Supply Target Methodology Paper 2024 to 2029
- CNPA570 - Aberdeenshire Council Strategic Housing Investment Plan 2024 - 2029
- CNPA571 - Aberdeenshire Local Development Plan 2029 Evidence Report - Quality Homes Topic Paper
- CNPA572 - Grampian Regional Equalities Council – Research Paper: Accommodation Needs of Ethnic Minorities, Gypsy/Travellers and Travelling Showpeople (2022)
- CNPA573 - Aberdeenshire Gypsy / Traveller Site Provision Strategy 2021-2026
- CNPA574 - Aberdeen City and Aberdeenshire Council Housing Land Audit 2025
- CNPA575 - Aberdeenshire Health and Social Care Partnership Strategic Plan 2020 – 2025
- CNPA636 - Aberdeenshire Local Outcomes Improvement Plan 2017 – 2027 (website)
- CNPA577 - Angus Council Housing Need and Demand Assessment November 2022
- CNPA578 - Angus Council Housing Land Audit 2024
- CNPA579 - Angus Council short term lets public register
- CNPA637 - Angus Community Plan 2022 – 2030
- CNPA580 - Moray Council Housing Need and Demand Assessment 2023
- CNPA581 - Moray Council Local Housing Strategy 2019-2024
- CNPA582 - Moray Council Strategic Housing Investment Plan 2024 / 25 - 2028 / 29
- CNPA1292 – Moray Local Development Plan 2027 – Evidence Report
- CNPA583 - Moray Council Housing Land Audit 2024 / 25
- CNPA584 - Moray Council Gypsy / Traveller Housing Need Assessment
- CNPA585 - Moray Council short term lets public register
- CNPA639 - Moray Local Outcomes Improvement Plan v2
- CNPA586 - Perth and Kinross Housing Market Partnership Housing Need and Demand Assessment Final Report November 2022
- CNPA587 - Perth and Kinross Council Local Housing Strategy 2022 - 2027 (2023)
- CNPA588 - Perth and Kinross Council Strategic Housing Investment Plan 2025 / 26 – 2029 / 30
- CNPA1293– Perth and Kinross Local Development Plan 3 2027 – Evidence Report Topic Paper No. 020: Homes
- CNPA589 - Perth and Kinross Council Housing Land Audit 2023
- CNPA590 - Perth and Kinross Council Change of Use of Residential Property of Short term Let
- CNPA591 - Perth and Kinross Council short term lets licensing public register



- CNPA640 - Perth and Kinross Community Plan (Local Outcomes Improvement Plan) 2022 – 2032
- CNPA806 - Housing Needs Survey Report for Strathdon Community Development Trust (March 2023)

## **Community action plans**

- CNPA063 - Aviemore, Rothiemurchus and Glenmore Community Action Plan 2024
- CNPA064 - Blair Atholl and Struan Community Action Plan: Looking to 2030
- CNPA065 – Grantown-on-Spey Community Action Plan: Looking to 2030
- CNPA066 - Kingussie Community Action Plan: Looking to 2030
- CNPA119 - Ballater and Crathie Community Action Plan 2023
- CNPA121 - Braemar Community Action Plan 2017
- CNPA122 - Carrbridge Community Action Plan: Looking to 2030
- CNPA123 - Cromdale and Advie Community Action Plan 2013
- CNPA125 - Dalwhinnie Community Action Plan: Looking forward to 2030
- CNPA127 - Kincaig and locality Community Action Plan: Looking to 2030
- CNPA129 - Laggan Community Action Plan: Looking to 2030
- CNPA130 - Mount Blair Community Action Plan 2013 – 2018
- CNPA131 - Nethy Bridge Community Action Plan: Looking to 2030
- CNPA132 - Newtonmore Community Action Plan: Looking to 2030
- CNPA133 - Strathdon Community Action Plan: Looking to 2030
- CNPA331 - Dulnain Bridge Community Action Plan: Looking to 2030
- CNPA374 - Boat of Garten Action Plan: Looking to 2030

## **Other relevant material**

- CNPA552 - Existing Housing Need in Scotland, Homes for Scotland (2024)
- CNPA554 - Rural planning in the 2020s: Technical report 2 – Analysis of rural housing market change, RTPi (June 2022)
- CNPA555 - The Role of Land in Enabling New Housing Supply in Rural Scotland, Scottish Land Commission (2020)
- CNPA556 - Land Supply for Housing in Rural Scotland, Scottish Land Commission (2025)
- CNPA557 - Place-based policy approaches to population challenges: Lessons for Scotland (2022)
- CNPA558 - Demographic challenges in the Highlands and Islands – A focus on peripheral and fragile areas, The Convention of the Highlands and Islands (October 2020)



- CNPA559 - Scottish Government Reporter's Gate Check decision on the Stirling Local Development Plan Evidence Report (Ref: GATE-390-1), dated 17 June 2025
- CNPA560 - European Shrinking Rural Areas: Challenges, Actions and Perspectives for Territorial Governance, ESPON 2020 project ESCAPE (2021)
- CNPA561 - How the pandemic reshaped the UK housing market
- CNPA1290 – Affordable Housing Need in Scotland Post-2026, Scottish Federation of Housing Associations, Shelter Scotland, Chartered Institute of Housing Scotland (2025)

### **Date sources**

- CNPA439 - Scotland's Census
- CNPA479 - Scottish Government Urban Rural Classification 2022
- CNPA532 - Scottish Government Statistics
- CNPA533 - National Records of Scotland
- CNPA563 – National Records of Scotland Rebased population estimates, Scotland, mid 2011 to mid 2021
- CNPA564 – National Records of Scotland Small area population estimates: mid 2022
- CNPA565 – National Records of Scotland - Small area statistics on households and dwellings, 2024
- CNPA813 – Cairngorms National Park Authority Self Build List October 2025
- CNPA1366 – Scottish Assessors Association
- CNPA1367 – The Highland Council Public Access – planning applications
- CNPA1296 – Highland Housing Register Prospects 2024 - 2025

### **Consultation material**

- CNPA030 – Cairngorms National Park Developers Forum agenda and attendance list – 19 August 2025
- CNPA807 – Informal engagement email invitation to constituent authorities July 2025
- CNPA808 – Informal engagement email response from The Highland Council's Development Plans Manager July 2025
- CNPA809 – Informal engagement email response from Aberdeenshire Council's Senior Information and Research Officer July 2025
- CNPA810 – Informal engagement email response from Aberdeenshire Council Housing Officers August 2025
- CNPA811 – Informal engagement email response from Perth and Kinross Council Planning Officer – Place Strategies August 2025
- CNPA812 – Informal engagement email response from Perth and Kinross Council Housing Officers August 2025



- CNPA1340 - Evidence report engagement responses
- CNPA1418 – Marr Estate response to Housing topic paper
- CNPA1420 – Scottish Environment Protection Agency response to Housing topic paper
- CNPA1421 - Scottish Forestry response to consultation 24 Sept 2025

## Summary of evidence

### Policy context

#### National Planning Framework 4

National Planning Framework 4 (CNPA008) came into force in February 2023 and is the long term National Spatial Strategy for Scotland. For the first time it contains a set of planning policies that form part of the statutory development plan.

National Planning Framework 4 has three themes, one of which is liveable places – ‘where we can all live better, healthier lives’. Page 10 of National Planning Framework 4 explains that liveable places are those with access to affordable, quality homes. It recognises that the planning system has an important role to play in supporting their delivery.

Policy 16 Quality homes encourages, promotes and facilitates the delivery of high quality, affordable and sustainable homes, in the right locations and with a choice of tenures. The 26 June 2024 joint Chief Planner and Minister’s letter confirms that the different parts of Policy 16, which are summarised below, should be weighed up as relevant to the proposals and that there is no hierarchy. The letter advises that a balanced planning judgement should be reached in each case.

Policy 16(a) supports proposals for new homes on land allocated for housing in local development plans. Local development plans must identify a Local Housing Land Requirement for their area. National Planning Framework 4 expects local development plans to take an ambitious approach that exceeds the 10 year Minimum All Tenure Housing Land Requirement (also referred to as the ‘10 year land requirement’) as set out in Annex E. For the Cairngorms National Park, the Minimum All Tenure Housing Land Requirement is 850 housing units.

Policy 16 advises that deliverable land should be allocated to meet the 10 year Local Housing Land Requirement in locations that create quality places for people to live. The location of new home allocations should be consistent with local living including, where



relevant, 20 minute neighbourhoods and an infrastructure first approach. National Planning Framework 4 requires diverse needs and delivery models to be taken into account, as well as allocating land for Gypsy / Travellers where a need is identified.

A local development plan delivery programme (currently called the 'Action Programme') is required, to establish a deliverable housing land pipeline to meet the Local Housing Land Requirement over the short (one to three years), medium (four to six years) and long term (seven to ten years). The delivery programme will provide a clear picture of the phasing of housing allocations so that infrastructure, to enable delivery, can be planned.

The Park Authority will be responsible for preparing the delivery programme, but annual Housing Land Audits, which will monitor housing delivery, will be undertaken by the respective local authorities. The Park Authority will take account of these and use them to inform the pipeline and identify actions required to bring sites forward.

Policy 16(b) states that Statements of Community Benefit are required for development proposals of 50 or more homes, and for smaller developments if required by local policy or guidance. Given the potential impact of developments of less than 50 homes on small settlements in the Cairngorms National Park a lower threshold should be considered.

Policy 16(c) supports development proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision. The Chief Planner and Minister's letter advises that this can be evidenced by a range of information available on local housing matters, such as local housing strategies, local authority housing emergency action plans or planned actions to support emerging economic opportunities.

Policy 16(d) supports development proposals for public or private, permanent or temporary, gypsy / traveller sites and family yards and travelling showpeople yards, including on land not specifically allocated for this use in a local development plan, where a need is identified, and the proposal is otherwise consistent with the plan's spatial strategy and other relevant policies. Policy 16 advises that local development plans should allocate land to ensure provision of accommodation for Gypsy / Travellers and travelling showpeople where need is identified.

Policy 16(e) supports development proposals for new homes where they contribute to the provision of affordable housing of at least 25% of the total number of homes. It adds that a higher contribution may be justified by evidence of need.



This approach is already taken in the adopted Local Development Plan 2021 (CNPA016). In response to evidence, Local Development Plan Policy 1.5 requires affordable housing to amount to 45% of the total number of dwellings in developments of four or more dwellings in the settlements of Aviemore, Ballater, Blair Atholl and Braemar.

Affordability remains one of the principal housing challenges within the National Park. Policy C2 (New Housing) of the Cairngorms National Park Partnership Plan 2022 - 2027 sets a target that by 2030, 75% of new housing is for social rental, mid market rental or other affordable categories, using the next local development plan to identify further locations where more than 25% affordable housing is required.

Policy 17 Rural homes aims to deliver more high quality, affordable and sustainable rural homes. It seeks to improve choice, support sustainable rural communities and safeguard and enhance distinctive character, sense of place and natural and cultural assets.

It requires local development plans to be informed by an understanding of population change, locally specific needs and market circumstances and to set out tailored approaches to rural housing, including, where relevant, proposals for future population growth.

Policy 17(a)(i) supports new homes in rural areas where the site is allocated within a local development plan. Policy 17(b) requires proposals for new homes in rural areas to consider identified local housing needs (including affordable housing), economic considerations and the transport needs of the development. Policy 17(c)(ii) supports new homes in remote rural areas where it would support identified local housing outcomes. Policy 17(d)(i) supports new homes that support the resettlement of previously inhabited areas where they are identified in a local development plan.

The following National Planning Framework 4 policies are listed as key connections to Policies 16 and 17 and are relevant to this evidence base:

#### Sustainable Places

- Policy 1. Tackling the climate and nature crises
- Policy 2. Climate mitigation and adaptation
- Policy 4. Natural places
- Policy 7. Historic assets and places
- Policy 9. Brownfield, vacant and derelict land and empty buildings



- Policy 13. Sustainable transport

#### Liveable Places

- Policy 14. Design, quality and place
- Policy 15. Local living and 20 minute neighbourhoods
- Policy 18. Infrastructure first
- Policy 19. Heat and cooling
- Policy 20. Blue and green infrastructure
- Policy 21. Play, recreation and sport
- Policy 23. Health and Safety

#### Productive Places

- Policy 25. Community wealth building
- Policy 28. Retail
- Policy 30. Tourism

Policy 27 City, town, local and commercial centres seeks to create centres that that are vibrant, health places to live in as well as to enjoy and visit. To help achieve this outcome, it states that local development plans should provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive in identifying opportunities to support residential development.

Policy 29 Rural development seeks two outcomes – vibrant and sustainable rural places where communities are supported; and a balanced and sustainable rural population. It states that local development plans should identify the characteristics of rural areas within the plan area, including the existing pattern of development, pressures, environmental assets, community priorities and economic needs of each area. The spatial strategy should set out an appropriate approach to development in rural areas which reflects the identified characteristics. Policy 29 advises that the Scottish Government's six fold Urban Rural Classification 2020<sup>1</sup> should be used to identify remote rural areas. Spatial strategies should support the sustainability and prosperity of rural communities and economies. Previously inhabited areas which are suitable for resettlement should be identified in the spatial strategy.

Policy 29(d) advises that development proposals that support the resettlement of previously inhabited areas will be supported where the proposal is identified in the local

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<sup>1</sup> The Scottish Government Urban Rural Classification 2020 was replaced by the Scottish Government Urban Rural Classification 2022 (CNPA479) in December 2024.



development plan for settlement; is designed to a high standard, responds to its rural location; and is designed to minimise greenhouse gas emissions as far as possible.

Policy 30(e)(ii) Tourism states that development proposals for short term holiday letting will not be supported where the reuse of existing buildings results in the loss of residential accommodation unless such loss is 'outweighed by demonstrable local economic benefit'.

Annex C of National Planning Framework 4 provides information on spatial planning priorities to guide the preparation of regional spatial strategies and local development plans. In relation to the North region, Annex C recognises that to deliver sustainable places in the Cairngorms National Park, demand for development will require a planned response to minimise the impact of second homes on local communities and to ensure new homes are affordable and meet local needs.

National Planning Framework 4 – Minimum all tenure housing land requirement – Cairngorms National Park Assessment Report, September 2021

This report (CNPA545) sets the initial Cairngorms National Park Authority's minimum all tenure housing land requirement and explains its derivation. The proposed 10 year all tenure requirement is 850 dwellings. The report explains that the requirement is primarily based on the National Records of Scotland 2018 based principal migration variant, with the deduction of newly forming households for those local authority data zones which split across the Cairngorms National Park boundary. The household projection is 600. The requirement is also based on the addition of a Scottish Government estimate of existing housing need figure of 50. A rural 30% flexibility allowance is then applied.

The report notes that the Cairngorms National Park Authority argued, through consultation on the derivation of the minimum all tenure housing land requirement, that, while the 30% flexibility allowance provides a total number that is comparable with the current adopted local development plan in this initial default estimate, a recalculation on the basis of other projections in the future could very significantly increase the housing land requirement and create a conflict with other policy and legislation. A 10% flexibility allowance is preferred. This would reduce the estimate by approximately 150 dwellings.

**National Planning Framework 4 – Minimum All tenure housing land requirement – Method Paper, February 2021**

This paper (CNPA546) explains the method used to arrive at initial default estimates for minimum all tenure housing land requirements for each local planning authority (all local



and national park authorities). It explains that, for national spatial planning purposes, it is the scale of land required to be allocated for housing that is relevant, hence figures are not separated into market and affordable housing. Tenure is to be considered at the local level, based on the detailed planning for housing process of the Housing Need and Demand Assessments and Local Housing Strategies.

The minimum all tenure housing land requirements are calculated for 15 years from 2022. This is because local planning authorities are expected to adopt new style local development plans within five years of National Planning Framework 4 being adopted, which, at the time of publication of this paper (February 2021) was expected to be in 2022. Including figures to 2036 allows the flexibility for all new style plans to look ahead 10 years.

Specific reference is made to the two national park authorities, noting that they are expected to work with the adjoining local authorities to consider whether there is a need for local adjustments to the initial default estimates.

The paper also explains that while the local authority figures are based on the National Records of Scotland 2018 based principal household projections, in the national parks the 2018 based estimates of occupied households are also used. These are used to derive a household projection for the whole of each national park and for each housing market area within each park. This is because National Records of Scotland do not produce household projections at sub national park level (only park level as a whole). These sub areas are required to avoid overestimates to local authorities that overlap the national parks, by subtracting the two national parks' requirements from their constituent authorities.

The paper notes that while Angus Council and Perth and Kinross Council are part of the Cairngorms National Park, the data zones involved are mainly on the Council side of the border and are included in the local council figures.

Total existing housing need is made up of two elements – a count of concealed and overcrowded households in the 2011 Census (uprated to the Scottish Household Statistics 2016 – 2018 estimates); and total households in temporary accommodation as of 31 March 2020.

Ten year default figures are set in Annex J. This includes a breakdown of the Cairngorms National Park figure into the housing market areas of Aberdeenshire, Highland and Moray. These figures provide an indication of how the Cairngorms National Park's



minimum all tenure housing land requirement was derived by the Scottish Government, although the breakdown by local authority is not provided in the steps described below, which follow on from Annex J. Under Annex J, the percentage distribution of the default 10 year figure is as follows: Aberdeenshire 20% (135); Highland 76% (514); and Moray 4% (27).

A flexibility allowance is applied at 25% for urban areas and 30% for rural areas. The paper explains that the allowances are higher than in the Scottish Planning Policy, because plans are now to be reviewed at 10 year intervals rather than five. As plans will be in place for longer, there is a greater chance of changes to sites coming forward. The higher rural percentage reflects the Planning (Scotland) Act 2019 (CNPA005) statutory requirement<sup>2</sup> for the National Planning Framework to contribute to the outcome of increasing the population of rural areas of Scotland.

Finally, the minimum all tenure housing land requirements are rounded to the nearest 50, to reflect the more flexible and indicative approach to housing land intended for the future. Table 3 and Table 4 extract the data within the paper relevant to the Cairngorms National Park.

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<sup>2</sup> Section 3A(3A) of the Town and County Planning (Scotland) Act 1997 (CNPA003).



Table 3 Extract from the Minimum All Tenure Housing Land Requirement Method Paper (Annex M - Step 13) showing calculation of the default housing figure for the Cairngorms National Park<sup>3</sup> (CNPA546).

	Existing housing need	Newly forming households	10 year default figure	Flexibility allowance	Flexibility allowance	10 year default figure with flexibility allowance added
	(a)	(b)	(a+b)=c	(d)	(c)x(d)=(e)	(c)+(e)
Cairngorms National Park	52	625	677	0.3	203	880

Notes relevant to the Cairngorms National Park:

- Local authorities are not responsible for planning in national parks. This is the responsibility of the national park authorities. The following authorities each contain a part of Cairngorms National Park: Aberdeenshire, Highland and Moray, Angus and Perth and Kinross. The national parks have been subtracted from the minimum housing land supply for the relevant local authorities and city regions.
- To do this, it was necessary to produce figures at sub national park level for the constituent local authorities. However, neither newly forming household or existing housing need figures are produced at this level of disaggregation. Instead, this is estimated as part of the Housing Need and Demand Assessment Tool. Firstly, the number of occupied dwellings was calculated for each park sub area and each local authority (this is available from National Records of Scotland). The proportion of sub area to local authority was then taken. The sub area proportion was then applied to

<sup>3</sup> Sources:

- Local Authority figures – 2018 based Household Projection, National Records for Scotland, published September 2020.
- National Park figures - 2018 occupied households, National Records of Scotland, published October 2020 and the Scottish Government HNDA Tool v4.0 published November 2020.

Existing housing need:

- 2011 Census (National Records of Scotland).
- Scottish Household Survey 2016 - 2018 (Scottish Government).
- Homeless Statistics as at 31 March 2020 (Scottish Government).

Newly forming households and existing housing need for the national parks:

- Housing Need and Demand Assessment Tool v4.0 as at November 2020 (Scottish Government).



both the household projections and existing housing needs counts for each local authority. This then gives a sub national park estimate of newly forming households and existing housing need.

Table 4 Extract from the Minimum All Tenure Housing Land Requirement Method Paper (Annex N - Step 14) showing rounded figures for the Cairngorms National Park (CNPA546).

	Existing housing need	Newly forming households	Flexibility allowance (25% urban, 30% rural)	Minimum all tenure housing land requirement
Cairngorms National Park	50	600	200	850

## Planning Circular 4 / 2025 Planning Obligations and Good Neighbour Agreements

This circular (CNPA547), which was revised to reflect legislative amendments, including the Planning (Scotland) Act 2019 (CNPA005), sets out the circumstances in which planning obligations and good neighbour agreements can be used.

Planning obligations are made under Section 75 of the Town and Country Planning (Scotland) Act 1997 (as amended) (CNPA003) and should only be sought where they meet a series of tests defined as the: necessity; planning purpose; relationship to proposed development; scale and kind; and reasonableness tests.

The most common use of planning obligations is to ensure the provision of infrastructure to make a development acceptable in planning terms, and Planning Advice Note 2 / 2010 (CNPA548) recognises their role where it is necessary to ensure retention of affordable housing units on a development site or to receive a commuted sum to enable the identified affordable housing to be provided off site.

The circular strongly encourages the adoption of formal policies on the use of planning obligation. It highlights that this provides an opportunity to involve the local community and the development industry in the process of development plan policy development, including supplementary guidance, to clarify the expected costs of any contributions that might be sought.

Paragraphs 49 – 51 of the circular recognise that planning obligations were used historically to restrict the use or occupancy of rural housing. The circular advises that



such restrictions can be intrusive, resource intensive, difficult to monitor and enforce and can introduce unnecessary burdens or constraints and should be avoided. It advises that where a local planning authority is satisfied that an 'adequate case' has been made for a new home, 'it should not be necessary to use a planning obligation as a formal mechanism to restrict occupancy or use'.

## Legislation and national documents

### National Park (Scotland) Act 2000

The National Park has four distinct aims as set out in The National Parks (Scotland) Act 2000 (CNPA004). As outlined in Schedule 1: Plan outcomes, the four aims will be amended by the Natural Environment Scotland (Scotland) Bill (CNPA634) once enacted. The aims, once amended through the Natural Environment (Scotland) Bill, will be:

- To conserve and enhance the area's natural and cultural heritage.
- To promote sustainable management and use of the area's natural resources.
- To promote public understanding and enjoyment of the area's natural and cultural heritage.
- To promote sustainable economic, social and cultural development of the area's communities.

All of the aims are relevant to the matters discussed in this schedule. The aims are all to be pursued collectively. However, if there is conflict between the first aim and any of the others, greater weight is given to the first aim (as set out in Section 9(6) of the 2000 Act).

### Crofters (Scotland) Act 1993

The Crofters (Scotland) Act 1993 (CNPA059), as amended by the Crofting Reform etc Act 2007, Crofting Reform (Scotland) Act 2010, and Crofting (Amendment) (Scotland) Act 2013, forms the legislative framework that governs the use of croft land in Scotland. The act sets out the definition for crofts and crofters and sets out duties crofters must meet to occupy croft land, including duties relating to residency, maintenance, cultivation and use. National Planning Framework 4 Policy 17 (CNPA008) states that local development plans should set out provision for tailored approaches to rural housing, including provision for small scale housing such as crofts or woodland crofts.

### National Performance Framework

The Scottish Government's National Performance Framework (CNPA007) sets out fifteen National Outcomes that aim to get everyone in Scotland working together,



including 'national and local government, businesses, voluntary organisations and people living in Scotland'. The outcome relevant to housing is communities.

The National Outcome for Communities sets out the following vision:

'Our communities are pleasant places to live where everyone has a warm, appropriate, efficient and affordable home. We value excellent and innovative design and are committed to sustainable planning and transport...'

'Our older people are happy and fulfilled and Scotland is seen as the best place in the world to grow older. We are careful to ensure no one is isolated, lonely or lives in poverty or poor housing. We respect the desire to live independently and provide the necessary support to do so where possible. We recognise that older people have particular needs around financial advice, mobility and transport, home improvements, heating, technology and the internet which require additional support.'

This outcome is directly linked to the Scottish Government's response to addressing five United Nations Sustainable Goals (CNPA002), the most relevant to housing being Affordable and Clean Energy (7), Reduce Inequalities (10) and Sustainable Cities and Communities (11).

### **Scotland's Housing Emergency**

The Scottish Parliament declared a housing emergency (CNPA541) on 15 May 2024. As well as identifying the reasoning for why there is a housing emergency in Scotland and the fact that nearly £600 million will be invested in affordable housing by the Scottish Government in 2024 – 2025, the declaration agreed that the Scottish Government, UK Government and local authorities must work together to deliver a housing system that meets the needs of the people of Scotland. The First Minister confirmed his intention to engage constructively to expand housing supply and tackle homelessness.

### **Chief Planner letter: planning for housing (June 2024)**

Following the Scottish Parliament's declaration of a housing emergency, the 26 June 2024 joint Chief Planner and Minister's letter (CNPA542), recognises that planning is just one of many factors that impact on the delivery of housing, but must play its part. The letter provides clarification on the application of National Planning Framework 4 (CNPA008), including Policy 16 Quality Homes. It also stresses that a more positive dialogue on planning for housing is needed, that recognises the benefits quality homes can bring and the need to find constructive solutions to challenges and work collectively on the issues.



### **Tackling Scotland's Housing Emergency – Housing Emergency Action Plan (2025)**

The Action Plan (CNPA1364) states that it comprises of 'new, enhanced and accelerated actions' to tackle the housing emergency. The actions are set out under three objectives:

- Ending children living in unsuitable accommodation – as a vital part of the Scottish Government's determination to eradicate child poverty.
- Supporting the housing needs of vulnerable communities.
- Building our Future – maximising investment in Scotland's housing sector.

It advises that Housing to 2040 (CNPA543) remains the overarching strategy and that the action plan supports its realisation. The action plan includes a 'call for action' calling on 'all partners across the housing sector, and beyond, to work alongside us as we take bold, coordinated action'. It asks partners to work with the Scottish Government to:

- Accelerate the delivery of high quality homes of all tenures, with a sharp focus on the delivery of affordable homes, particularly social rent.
- Work to end children living in unsuitable accommodation.
- Support the housing needs of the most vulnerable in our communities.
- Unlock land and investment to meet the needs of Scotland's diverse communities.

In terms of new development, it recognises that the planning system is central to the response and must do all it can to overcome delivery challenges. It expects an emergency led approach to decision making both in the preparation of local development plans and in the determination of planning applications.

It advises that 'the delivery on more affordable homes remains the beating heart of our approach', delivered through the Affordable Housing Supply Programme. It also advises that the Scottish Government will support the delivery of more homes in rural and island communities by working with public bodies, landowners and the Scottish National Investment Bank to unlock land, build delivery capacity and develop a pipeline of investment opportunities.

### **Scotland's Population Health Framework 2025 – 2035**

Jointly published by the Scottish Government and the Convention of Scottish: Local Authorities, the framework (CNPA696) is for all with a role to play in creating and maintaining good physical and mental health and wellbeing. It represents a shift in culture, from treating illness to prevention and a more whole system approach to improving health. to improve Scottish life expectancy whilst reducing the life expectancy gap between the most deprived 20% of local areas and the national average by 2035.



The framework states that there is a 'medium to long term aim' to 'develop affordable, high quality housing, and good transport infrastructure' and sets out initial actions. This includes an action to 'support the contribution of housing to better health'. It advises that this action will include:

- Sustaining national and local cross government collaboration to ensure inequalities are addressed and health outcomes are maximised as we respond to the current housing emergency.
- Progressing the Housing (Scotland) Bill – including rent control and the development of a homelessness prevention duty.
- Progressing joint actions agreed by Scottish Government and the Convention of Scottish Local Authorities on improving the provision of temporary accommodation and affordable housing.

### **Housing to 2040 (2021)**

Housing to 2040 (CNPA543) is Scotland's long term national housing strategy, published in 2021. It predates National Planning Framework 4 and comprises a vision and principles document and a route map. The overarching aim is that 'by 2040, everyone will have a safe, high quality home that is affordable and meets their needs in the place they want to be' (Housing to 2040, page 15).

The vision aims to achieve: a well functioning housing system; high quality, sustainable homes; sustainable communities; and homes that meet people's needs. It includes a commitment to deliver 100,000 affordable homes by 2031 / 2032. Under the vision are 15 principles.

Relevant to this housing paper are:

- Principle 2 states that the housing system should supply high quality homes that are affordable for living in and comments that 'one decent home per household takes priority over second homes and investment returns'. It recognises that Government actively shapes the market so that everyone has a reasonable choice of where they live and the type of accommodation they live in.
- Principle 6 requires tenure neutral space and quality standards.
- Principle 10 states that brownfield sites should be prioritised and that all housing should be resilient to climate change, including minimising flood risk, and promote biodiversity.
- Principle 11 states that new housing and community resources should only be provided where it helps to create safer, stronger, attractive, sustainable and integrated communities. This means facilitating active or accessible travel to school,



healthcare and employment opportunities, and enabling residents to continue to be active in their community as they get older. It notes that this is a more organic approach to new housing with the right number and type of homes placed in such a way as to strengthen the existing community.

- Principle 12 empowers local communities to respond to housing need in their area by taking action to meet that housing need and having a say about how the homes are used in their area (for example the numbers of second homes).
- Principle 13 encourages place based approaches to help existing and new communities be physically, digitally, culturally and economically connected within a coherent geographic region. It recognises that settlements do not exist in isolation but have strong inbound and outbound connections.
- Principle 15 envisages a highly flexible housing market to meet people's changing needs.

To achieve the vision and principles, the Housing to 2040 route map sets out the actions that the Government proposes to undertake to deliver their ambitions. It comprises twenty actions, under four parts: More Homes at the heart of great places; Affordability and choice; Affordable warmth and zero emissions homes; and improving the quality of all homes.

While many of the actions are focused on changes to legislation, regulations and funding, the Housing to 2040 route map recognises (on page 23) that 'the statutory planning system is a powerful lever to deliver more for communities'. Action 5 seeks to make the planning system more directive about the quality of places, including where new development should happen and how those developments can deliver more for new and existing communities. It explains this through six criteria, which would be achieved through National Planning Framework 4 (CNPA008):

- Taking a brownfield first approach to development.
- Adopting an infrastructure first approach to neighbourhood planning.
- Planning places to significantly reduce overall car mileage.
- Supporting the development of quality homes that meet people's needs.
- Significantly simplifying the system by tackling the question of housing land requirements up front, so that planning can focus on quality and delivery.
- Rolling out masterplan consent areas to identify places where homes can be built without the need for planning permission.

### **Rural and Islands Housing: Action Plan (2023)**

The action plan (CNPA544) sets out a range of actions to support Housing to 2040 and meet the priority to provide affordable housing for rural and island communities. The



plan highlights the role of local development plans in the delivery of high quality affordable homes, including that they must contain a spatial strategy that makes provision for housing in rural areas. It advises that the resource implications of the proposed pattern of development should be understood, including access to local community services and support for sustainable transport, to inform a rural approach to the concept of local living.

Availability of land is identified as one of the key challenges to the delivery of more homes. A 12 month Community Settlement Officer post (one of three across Scotland) was created in 2022 in The Highland Council to better understand local population challenges and to develop solutions to address these. This has involved an in depth mapping exercise of potential plots of land identified through the strong local knowledge of communities, successfully developing positive engagement between private estates, public bodies and community groups.

The plan recognises that:

‘Demand for second homes, especially when concentrated in particular areas, can reduce the supply of permanent homes and inflate house prices, making it more difficult for people, particularly younger people, or those with fewer resources, to access the homes they need.’ (page 25)

But also, that:

‘Second homes and short term lets bring benefits to those who own them and the tourism businesses and local economy that they support. While recognising the positive economic impacts that tourism can bring, low occupancy of second homes, even if used partially as short term lets, can minimise associated economic contribution and the broader support for local public services.’ (page 26)

The plan highlights that (based on September 2022 data), while second homes account for 0.9% of the total number of dwellings across Scotland, this rises to 6.5% in remote rural<sup>4</sup> areas, with empty homes accounting for a further 5.5%, compared to 3.4% across Scotland as a whole. The new mandatory licensing regime is stated to be appropriate for the whole of Scotland to regulate short term lets. The action plan commits to continued funding of the Scottish Empty Homes Partnership to return homes to active use, particularly as affordable housing.

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<sup>4</sup> As defined by the urban / rural classifications.



The action plan also highlights the role of community led housing and the important role new housing plays for rural economies. The plan showcases the development of 24 social rented homes on a former school site in Ballater and the boost to the local economy of utilising local contractors.

### **Supporting and enabling sustainable communities: an action plan to address depopulation (2024)**

Published in February 2024, this action plan (CNPA553) sets out the Scottish Government's strategic approach to addressing the challenges of population attraction and retention within communities facing population decline.

The plan emphasises the importance of local leadership and anticipates a place based approach, with the action plan providing a starting point on how best to deliver on local needs and ambitions.

As well as a list of actions, the document identifies the local and national context, including the evidence base, the role of 'regional and local actors' such as local authorities and enterprise agencies and the support needed from Scottish Government.

Nationally, Scotland's population is projected to fall by 0.6% from mid 2023 to mid 2045, while the United Kingdom's population is projected to grow by 8%. This change is not universal however, with growth in the central belt and urban areas and decline mainly projected to be in the West of Scotland. However, the Scotland wide map on page 8 of the document indicates that growth is anticipated to 2030 in Badenoch and Strathspey and rural Aberdeenshire, within the National Park.

The plan is clear that the Scottish Government does not intend to restore population to historic levels, nor set targets or outcomes for specific geographic areas. Instead, it seeks to set out support for place based and / or person centred interventions.

A series of national level policies are set out, which can support locally led initiatives and set core foundations. These enabling policies are grouped into the themes of infrastructure, services, land and marine, culture and economy.

The importance of housing (under the infrastructure theme) is recognised. Two key national documents – Housing to 2040 and the Rural and Islands Housing Action Plan are summarised and the following Scottish Government actions listed:



- We will deliver 110,000 affordable homes of which at least 70% will be for social rent and 10% in rural and island areas, supported by our Rural and Island Housing Action Plan, to help attract and retain people to communities.
- We will make available up to £25 million from our Affordable Housing Supply Programme budget over the period 2023 - 2028 for the demand led Rural Affordable Housing for Key Workers Fund, to enable local authorities and registered social landlords to purchase properties in rural and island areas which can be rented directly or leased to employers to provide affordable homes for key workers.
- We will work with local authorities, enterprise agencies and business representatives including private developers to improve understanding of housing requirements arising from key sectors. We will seek to enable more housing provision through sharing of good practice and collaboration between employers and housing providers.
- We will work with the Scottish Empty Homes Partnership, local authorities and owners to bring more empty homes in rural and island areas back into use, promoting available funding options, sharing best practice and identify opportunities for stronger collaboration.
- We will invest £566 million in 2024 - 2025 through our Affordable Housing Supply Programme as we continue to support the delivery of affordable homes to meet housing needs across Scotland.
- We will continue to provide support of up to £30 million for the continuation of the demand led Rural and Island Housing Fund, supporting communities, landowners and other eligible organisations in the provision of affordable housing, through early feasibility funding as well as grant support. This is in addition to housing delivery by local authorities and Registered Social Landlords through the mainstream Affordable Housing Supply Programme.
- We will develop guidance to support communities, local authorities and others to undertake local housing assessments based on best practice and robust methodology.

### **Planning Advice Note 2 / 2010: Affordable Housing and Housing Land Audits**

The note (CNPA548) provides advice in relation to affordable housing and housing land audits. In relation to affordable housing, it advises that a range of housing types, at different prices, tenures and locations are needed to cater for the increased number and variety of households, to maintain the viability of communities and to support the operation of local labour markets and the wider economy.

The note explains how affordable housing should be delivered through the planning system. In summary this is through housing need and demand assessments and local



housing strategies identifying a shortage of affordable housing, which is addressed in a local development plan as part of the housing land allocation. It also states that a local planning authority should be clear on the scale and distribution of affordable housing, including by outlining what is expected from developers.

This includes guidance on developer contributions to affordable housing, with paragraph 19 stating that it 'should ideally be integrated into the proposed development and wider community' through the developer contributing serviced land for affordable housing at a value less than mainstream housing for sale. In exceptional circumstances, where a site is unsuitable for affordable housing for a variety of reasons including the size of the site, location, topography, conversion of buildings or other local circumstances, a contribution on another site or through the provision of a commuted sum may be acceptable. In these cases, the provision must be of a value equivalent to the cost of providing the affordable housing on site. The note advises that the rationale for accepting or rejecting a commuted sum should be set out clearly in local policy and that a Section 75 agreement may be necessary.

The advice note also highlights (paragraph 30) that there are alternative means of delivering affordable housing including allocating sites in local development plans specifically for affordable housing and identifying plots for self build dwellings. Paragraphs 31 – 34 highlights that national planning policy aims to achieve high quality, well designed homes and that affordable housing ought to be indistinguishable from the general mix of other houses on a site. It advises that both 'pepper potting' of individual affordable houses and large groupings of houses of the same tenure are best avoided, instead recommending concentrating affordable housing for rent in small groups.

In relation to housing land audits, the note sets out good practice advice. At the time of publication of the advice note, Scottish Planning Policy<sup>5</sup> required a five year ongoing effective land supply be available to meet the identified housing land requirement. Housing land audits are the established means for monitoring housing land. They provide an annual update of the amount of land available for the construction of housing.

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<sup>5</sup> Note that National Planning Framework 4 (CNPA008) replaced the Scottish Planning Policy and it removes the requirement to maintain a five year housing land supply and replaces this with an expectation that the local development plan delivery programme will establish a deliverable housing land pipeline for the Local Housing Land Requirement. Nevertheless, Planning Advice Note 2 / 2010 (CNPA548) remains extant and local authorities continue to produce annual housing land audits.



The housing land audit is required to set out housing completions as well as anticipated future construction. The established housing land supply includes sites allocated in Local Development Plans plus windfall sites (non allocated sites with planning permission or on previously developed sites where potential for housing has been established through a capacity study). The effective housing land supply comprises those sites which are 'unconstrained'. For a site to be effective it must be demonstrated that it can be developed for housing (residential dwellings completed and available for occupation) within five years and be free of constraints relating to ownership; physical characteristics; contamination; public funding; marketability; infrastructure; and land use. The audit should include programme expected annual completions on each site.

The Cairngorms National Park Authority has no statutory duty to produce a housing land audit; however, it can draw on information from the housing land audits completed by the five constituent local authorities to provide an estimate of its housing land supply.

#### **Chief Planner letter: occupancy conditions and rural housing (2011)**

The letter (CNPA549) promotes a positive approach to rural housing and advises that local planning authorities should support this through development plans. It advises that the use of occupancy restrictions to limit the occupancy of new houses in the countryside either to people whose main employment is with a farm or other rural business, or to people with a local connection, is causing practical difficulties in the delivery of rural housing. It states that occupancy restrictions can be intrusive, resource intensive and difficult to monitor and enforce and that they are not promoted within national policy as a management tool for rural housing. The first section of the letter concludes that 'the Scottish Government believes that occupancy restrictions are rarely appropriate and so should generally be avoided'.

#### **Short term lets in Scotland Licensing Scheme - Part 2. supplementary guidance for licensing authorities, letting agencies and platforms (2023)**

The guidance (CNPA551) explains that there are four types of licence: a) secondary letting; b) home letting; c) home sharing; or d) home letting and home sharing. Home sharing and home letting concern the use of the host or operator's only or principal home whereas secondary letting makes use of a separate premises.

Each licensing authority (the five local authorities in the case of the Cairngorms National Park area) should have regard to their planning authority's objectives and policies including the local development plan, other relevant planning policies; and any intended or designated control areas. Licensing authorities can decide to grant a licence for a



period of up to three years initially and may grant licences for different time periods to different applicants or for different types of short term licence.

The guidance advises that planning policies still apply (although this will not commonly affect smaller scale home sharing and home letting). However, they are relevant for secondary letting, especially within control areas.

The high level policy behind control areas is as follows (paragraph 4.10):

- to help manage high concentrations of secondary letting (where it affects the availability of residential housing or the character of a neighbourhood).
- to restrict or prevent short term lets in places or types of building where it is not appropriate.
- to help local authorities ensure that homes are used to best effect in their areas.

Licensing authorities are required to maintain a public register of short term let licences. There is a specification for the public register (Annex B of the guidance). It includes a requirement to identify whether the short term let is within either of Scotland's two national parks. The guidance advises (para 7.8) that the requirement for the data is to assist the national parks 'in identifying short term let activity within their boundaries (which are not necessarily contiguous with licensing authority boundaries)'.

The public register must also list the type of premises, the maximum number of guests allowed to reside in the premises, and the number of bedrooms or individual pods on a single site.

## **National Park Authority documents**

### **Cairngorms National Park Partnership Plan 2022 – 2027**

The Cairngorms National Park Partnership Plan (Partnership Plan) (CNPA010) is the overarching land use management plan for the National Park and sets out how all those responsible for it will coordinate their work to tackle the most important issues. It also provides the strategic direction for key strategies and plans, including the Local Development Plan. This includes a spatial strategy, which identifies strategic developments and a settlement hierarchy (see Schedule 1, Figure 4).



The Local Development Plan will need to align with the Partnership Plan. The outcomes for the Cairngorms National Park Local Development Plan are therefore those of the Cairngorms National Park Partnership Plan. This is explained further in Schedule 1: Plan Outcomes. In relation to housing, the local development plan will follow the settlement hierarchy by concentrating housing development in strategic settlements.

The Partnership Plan contains sets of objectives, targets and policies under three overarching outcomes: Nature, People and Place. Housing is one of the biggest challenges within the National Park and there are three objectives within the 'Place' theme (page 60) that aim to tackle the housing issues. These objectives are:

B1. Working age population, seeks to increase the proportion of young and working age people in the National Park relative to the total resident population, which remains stable. The target is for this to be achieved by 2045. Actions by 2027 are:

- Develop and implement a Local Development Plan.
- Develop a green skills / youth apprenticeship project to help grow a strong working age population.
- Grow the influence and level of youth participation in the Cairngorms Youth Action Team.
- Heritage Horizons: Cairngorms 2030 programme.

B5. Community assets and land, aims to increase the number of assets in community ownership or management, the number of social enterprises that generate a profit and the area of land where communities are involved in management decisions. The target is for the number of assets in community ownership or management to increase in on year from 2021. Actions by 2027 are:

- Identify opportunities for community land ownership through a refreshed set of community action plans / local place plans.
- Promote Scottish Land Commission guidance and monitor compliance.
- Develop targeted skills initiatives to support social enterprises.
- Support communities to acquire and manage assets / land through enhanced funding and training support.
- Heritage Horizons: Cairngorms 2030 programme.

C1. Access to housing, which aims to ensure that there is sufficient affordable housing stock to enable people to live and work within the National Park. Its target is for a maximum of 15% of all housing stock in the National Park to be second homes, vacant or short term let properties by 2040. Actions by 2027 are:



- Introduce short term let control areas and licencing to increase the availability of mid market properties to meet local needs.
- Secure investment in the private rented sector to provide long term housing for workers and local people.
- Develop partnership approaches led by local businesses and community led initiatives to address accommodation needs for workers and local people.

C2. New housing aims to deliver new housing in the National Park and ensure as much as possible is secured for key workers and / or to resolve affordability issues. It sets a target that by 2030, 75% of new housing is for social rental, mid market rental or other affordable categories that provide affordability in perpetuity. Actions by 2027 are:

- Deliver at least 200 new affordable and mid market rental homes through local authority strategic housing investment plans and affordable housing delivery programmes.
- Use the next Local Development Plan to identify further locations where more than 25% affordable housing is required and bring this up to 75% affordable overall.
- Support communities to deliver community led housing solutions, including by making the most of powers to buy land and taking a more proactive role in management where appropriate.

C3. Housing and community benefit, seeks to work with communities to ensure that the majority of land allocated for development around villages and towns in the National Park is controlled by communities or public bodies to help manage long term development needs. It seeks to increase the percentage of developable land in community or public body ownership. While this objective is not wholly housing related, it seeks to increase the contribution that community led housing can make within the National Park. Actions by 2027 are:

- Review options and funding for public sector purchase of allocated development land.
- Support communities to use all possible options to access land for the developments they need.
- The Park Authority led Cairngorms 2030 programme which is taking forward a number of projects that support communities.

Policy C1 is a place policy within the Partnership Plan, which states that the Cairngorms National Park Authority will 'enable sustainable patterns of settlement development, infrastructure and communications while maintaining the integrity of designated sites'. It lists eight criteria by which it will do this, two of which relate to planning for housing. These are (a) consolidating the role of the strategic settlements as the most sustainable



places for future growth and the focus for housing land supply; and (b) providing any additional flexibility in future housing land supply at small sites around a wider range of settlements.

### **Cairngorms National Park Local Development Plan 2021**

The Cairngorms National Park Local Development Plan (CNPA016) was adopted on 26 March 2021. The Plan focuses on the five year period until 2025 but includes development proposals for the 10 year period until 2030, as well as providing a general indication of the likely scale and location of development as far as 20 years into the future (2040).

The Plan identifies Housing Supply Targets up to 2030 for each of the constituent local authority areas that make up the National Park except Angus (Aberdeenshire, Highland, Moray, and Perth and Kinross) and sets out Housing Land Requirements, based on a generosity level of 10% above the Housing Supply Targets, which total 819 housing units over the 10 year period (see Table 5 and Table 6). An indicative Housing Land Requirement target of 648 housing units is provided for 2030 – 2039.

These targets are based on the local authority Housing Need and Demand Assessments, which set out housing need and demand in wider housing market areas which cover the Cairngorms National Park. The Housing Supply Targets are a realistic assumption of what can be delivered, while ensuring a generous supply of land available to ensure that new housing is delivered. The Plan advises that the Housing Need and Demand Assessment process did not identify any need to allocate land in the Cairngorms National Park for Gypsy / Traveller or Travelling Show People accommodation.

Table 5 Cairngorms National Park Local Development Plan 2021 – Housing Supply Target (Table 1, page 26) (CNPA016).

Local Authority Area	2020 – 2024			2025 – 2029			2030 – 2039 (Indicative target)		
	Market	Affordable	Total	Market	Affordable	Total	Market	Affordable	Total
Aberdeenshire	40	35	75	26	23	49	47	38	85
Angus	0	0	0	0	0	0	0	0	0
Highland	144	165	309	118	100	218	236	200	436



Local Authority Area	2020 – 2024			2025 – 2029			2030 – 2039 (Indicative target)		
Moray	18	10	28	14	7	21	22	13	35
Perth and Kinross	13	14	27	9	7	16	18	14	32
Total	215	224	439	167	137	304	323	265	588

Table 6 Cairngorms National Park Local Development Plan 2021 – Housing Land Requirement based on a generosity level of 10% (Table 2, page 26)<sup>6</sup> (CNPA016).

Local Authority Area	2020 – 2024		2025 – 2029		2030 – 2039 (indicative target)	
Aberdeenshire	83		54		94	
Angus	0		0		0	
Highland	340		240		480	
Moray	31		23		39	
Perth and Kinross	30		18		35	
Total	484		335		648	

The adopted Local Development Plan (CNPA016) is accompanied by a suite of supplementary and non-statutory planning guidance to support the delivery of the plan. This includes Housing Supplementary Guidance. This highlights that the Housing Supply Target identifies a need for 489 affordable homes between 2020 and 2029 and that the preferred location for new housing is within the Strategic, Intermediate and Rural Settlements. While the Cairngorms National Park Authority's preference is for affordable housing to be delivered on site, where this is not possible, such as for a development of less than four houses, a financial contribution to provide affordable housing elsewhere may be more appropriate.

The supplementary guidance sets out the commuted sum, per unit, for developments on one to three houses. The level of contribution has been set at 10% of the full market cost of delivering affordable housing, based on a viability study. The supplementary guidance also notes that the Cairngorms National Park has a disproportionately high proportion of larger and detached dwellings, resulting in a housing stock that is poorly equipped to meet arising housing needs. The guidance advises that development should focus on smaller dwellings (one, two and three bedroom properties); and semi-detached,

<sup>6</sup> Note: the totals are the sum of each local authority area requirement rather than a 10% increase of the total Housing Supply Target.



terraces, or where appropriate, flatted properties as a way of delivering housing that is better targeted to housing need.

### **Cairngorms National Park Local Development Plan 2021: Delivery Programme 2025**

The aim of the Delivery Programme (CNPA334) is to achieve the intended outcomes of the Cairngorms National Park Local Development Plan 2021.

As an update and replacement for the Action Programme 2022, it introduces a colour coded 'delivery pipeline' (section 2); provides details on affordable housing and financial contributions secured through planning permissions (section 3) and provides a greater level of detail on the planning history of each allocated site in each settlement (section 6). A draft version was the subject of consultation with internal officers and key stakeholders (local authorities, landowners, developers and key agencies).

## **Local authority documents**

### **Local housing strategies**

The contents and implication of local housing strategies are set out in the section on housing need and demand (see page 90).

### **Highland Council Non-Statutory Short Term Let Control Area Planning Policy**

Introduced in November 2023, the policy (CNPA433) responds to the fact that the proposed use of a dwellinghouse as a short term let requires planning permission in a designated control area. The ward of Badenoch and Strathspey is a designated control area.

The non-statutory policy states that National Planning Framework 4 Policy 30(e) (CNPA008) applies, which does not support proposals for short term holiday lets that result in the loss of residential accommodation, unless the loss is outweighed by demonstrable local economic benefits.

The use of an existing dwellinghouse as a short term let will be supported where it falls within one of the following categories:

1. It is a long term empty dwellinghouse that will be brought back into active use.
2. The dwellinghouse is located above a commercial unit within a city, town or village centre.
3. The dwellinghouse has no fewer than four bedrooms, as it existed at the date of the establishment of the Control Area or, if constructed after the designation of the Control Area, as originally built.



The non-statutory policy also states that, when assessing the impact on local amenity and character (National Planning Framework 4 Policy 30 (e)(i)), the Council will consider privacy, amenity, parking provision, commercial waste storage, and neighbouring land uses.

### **Badenoch and Strathspey Area Place Plan**

The Area Place Plan (CNPA237) was approved by The Highland Council on 3 November 2025. It has been developed using a place based approach and does not set out to replace existing plans and policies for the area. Instead, it aims to capture and present what the common themes and priorities are and aims to serve as a comprehensive document that not only reflects the aspirations of the local community but also aligns with existing strategic and localised plans, ensuring that Badenoch and Strathspey thrives as a sustainable, liveable, and prosperous community.

The action plan was developed in conjunction with the Cairngorms National Park Authority and Voluntary Action Badenoch and Strathspey, who are leading the review of existing Community Action Plan priorities. Many pieces of community engagement work have been carried out along with wider statutory partners including National Health Service Highland.

The emerging priorities for Badenoch and Strathspey have been aligned with the three pillars of people, place and prosperity, setting out issues, challenges and opportunities under each theme. In relation to housing, it presents an analysis of housing need and demand to provide an evidence base to support local decision making and community led action. The evidence collated is also within this schedule.

### **Local Outcome Improvement Plans**

Local outcome improvement plans outline key priorities for each community board area that have been identified through a range of engagement processes and are based on the needs of local communities. They set out an approach to working with and empowering our local communities, enabling them to contribute to, influence and shape locally identified actions around the priorities to achieve improved outcomes for their areas. The five local authorities which overlap the Cairngorms National Park all have individual Local outcome improvement plans (in some cases referred to as community plans).

While the Cairngorms National Park Partnership Plan (CNPA010) is the source of the vision for the local development plan (as explained in Schedule 1: Plan outcomes) the



local development plan may support the delivery of the vision and priorities of local outcome improvement plans. A summary of issues relating to this schedule for each local authority are set out below.

### **Aberdeenshire Local Outcome Improvement Plan 2017 – 2027**

The Aberdeenshire Community Planning Partnership's Local outcomes improvement plan (CNPA636) sets a 10 year vision. One of two current priorities agreed in September 2024 is place based community planning. While there are no Local Place Plans registered covering any areas in the National Park, the Proposed Plan will have regard to the community action plans.

### **Angus Community Plan 2022 – 2030**

The Angus Partnership's community plan (CNPA637) has a vision for 2030 that Angus is a great place to live, work and visit. 'Caring for our Place' is one of three priorities to achieve the vision. Under this priority, the plan states that the Angus Housing Strategy will be the vehicle to set out how housing will help improve the lives of residents and communities. The number of affordable homes built, against the annual target, will be one of the plan's targeted measures.

### **2024 – 2027 Highland Outcome Improvement Plan**

The Highland Community Planning Partnership's outcome improvement plan (CNPA638) vision is to maximise opportunities and tackle inequality to build a thriving Highlands for all. Three strategic priorities - people, place and prosperity - have been identified. One of three outcomes the partnership wishes to achieve under the place priority is to tackle depopulation 'by addressing the key barriers to sustaining local communities – housing, transport, childcare'.

### **2024 – 2027 Highland Outcome Improvement Plan – Delivery Plan**

The Highland outcome improvement plan delivery plan (CNPA1091) introduces cross cutting themes to deliver the three priorities (people, place, prosperity). 'Connecting people and places' is a cross cutting theme. The purpose is to deliver better use and alignment of partnership assets and improved integrated service deliver. Two of the listed deliverables are 'transport connections mapped as part of master planning approach' and 'develop an area based service map', with a measure of success being 'shared public sector asset map in place'.

### **Moray Local Outcome Improvement Plan v2 (2016 – 2026)**

Moray Community Planning Partnership's 10 year outcome improvement plan (CNPA639) has a vision to raise aspirations 'through expanded choices, improved



livelihoods and wellbeing'. It focuses on areas where Moray faces the poorest outcomes, ensuing these are central to plans, strategies and priorities. The local housing strategy and affordable housing strategy are recognised as related strategies to achieve their vision.

### **Perth and Kinross Community Plan (Local Outcomes Improvement Plan) 2022 – 2032**

Perth and Kinross Community Planning Partnership's community plan (CNPA640) has an ambition to be the best place in Scotland for everyone to live life well, free from poverty and inequality. Five priorities are identified, all of which focus on inequalities. One of the priorities is reducing poverty and actions include 'revising and updating the fuel poverty strategy within the local housing strategy'.

### **Community action plans**

The following action plans identified issues and / or priorities relating to housing.

#### **Aviemore, Rothiemurchus and Glenmore Community Action Plan: Looking to 2030**

Published in November 2024, this action plan (CNPA063) looks beyond the two to three year timespan of their previous plan to consider where the community wanted to be by 2030.

Under the Socially Connected Community theme, one of three priorities is to 'provide housing that people who want to live and work here can afford'. Two projects are identified, as follows:

- Housing must be really 'affordable': mix of shared ownership, social rent, self build available for our young people and to support key businesses.
  - Important for 'affordable' to relate to local wage levels to support local employment.
  - Include provision for single person accommodation.
  - Incorporate more sheltered / supported housing.
  - Provide care home spaces.
- Lobby for social housing stock to remain in perpetuity.
  - Work with Registered Social Landlords to ensure awareness of community's wishes.

#### **Ballater and Crathie Community Action Plan 2023**

The community action plan (CNPA119) is a five year plan with strategic projects, a vision and seven focus areas. Focus area six is affordable housing. A housing subgroup has been formed. The strategic goal for housing is to identify creative solutions to



address housing need and to work with housing associations, local authorities, Cairngorm business partnership, landowners and other appropriate bodies.

### **Blair Atholl and Struan Community Action Plan: Looking to 2030**

Compiled in 2023, the community action plan (CNPA064) sets out three themes – a socially connected community, a climate conscious community; and an economically thriving community.

One of the priorities to deliver a socially connected community, is to have affordable places to live. The plan identifies that this requires investment in more affordable housing including dedicated accommodation for key workers in health and education; accommodation to support local businesses; legal conditions to prevent affordable housing reverting to the open market; and identifying properties which are vacant or derelict to try to bring them back into use.

It also proposes to investigate community owned options for housing development by working with partners, including Cairngorms National Park Authority, to explore possibilities to purchase land at a reasonable price.

### **Boat of Garten Action Plan: Looking to 2030**

Published in spring 2025, the community action plan (CNPA374) sets out the community's vision for the longer term (up to 10 years) with suggestions and possible actions grouped across five specified themes: - a socially connected community; a climate conscious community; an economically thriving community; supporting our young people; and a culturally vibrant community.

A top suggestion under the socially connected community theme, is 'more affordable (rental) housing for local people and businesses'. The proposed action is to investigate options for making more housing available through requesting a housing needs analysis; exploring possible plots and zoned areas for housing; ensuring new housing is affordable and energy efficient; and looking into the need for sheltered housing.

### **Braemar Community Action Plan 2017**

This refreshed version (CNPA121) of the 2013 plan has five themes. Theme five sets out the actions for housing and economic development. In relation to housing, a lack of affordable housing, and specifically a lack of accommodation for seasonal employees, is noted as a hindrance to business. Item 37 on the action list is the delivery of lower cost small houses or apartments on the Kindrochit site – but access issues are noted, and the proposal is to identify alternative sites if these issues are not resolved.



Braemar Community Action Plan is currently under review and an updated version is expected to be published in 2026.

### **Carrbridge Community Action Plan: Looking to 2030**

Compiled in spring 2022, the community action plan (CNPA112) contains a vision and priority activity set across four themes. These themes are a socially connected community, a climate conscious community, an economically thriving community, and a culturally vibrant community. A priority under 'an economically thriving community' is for local people to be given affordable housing priority and a need to cap second homes.

### **Cromdale and Advie Community Action Plan 2013**

The community action plan (CNPA123) sets out a number of priorities divided into high, medium and low priority. The construction of houses on local development plan site H1 is listed as a medium priority.

### **Dalwhinnie Community Action Plan: Looking forward to 2030**

Compiled in summer 2023, three themes are identified in the community action plan (CNPA125). Under the 'economically thriving community theme', a priority is to improve opportunities for local development, including addressing planning issues for the village to help proposed business and residential development in and around A889.

### **Dulnain Bridge Community Action Plan: Looking to 2030**

Published in 2025, the community action plan's (CNPA331) vision is set across the three themes of a social connected community; a climate conscious community; and a community for our young people. The summary notes that recent successes include new housing for the community. No specific housing priorities are identified for Dulnain Bridge's future. The map indicates that one desired action is to address the issue of holiday / second homes.

### **Grantown-on-Spey Community Action Plan 2025**

Published in 2025, the community action plan's (CNPA065) vision is set across the five themes of a social connected community; a climate conscious community; an economically thriving community; supporting our young people; and a culturally vibrant community.

Under a socially connected community, the top suggestions include 'more affordable (rental) housing for local people and businesses'. It suggests investigating options to make more housing available, including the development of site H2 allocated in the



Local Development Plan (CNPA016); calling for the National Park to respond to the negative impact of second homes; supporting the former Ian Charles Hospital redevelopment for key worker housing; and increasing the proportion of affordable housing in line with the aim to reach 75%.

Under an economically thriving community, top suggestions include redeveloping the former Ian Charles Hospital and former Palace Hotel sites for key worker accommodation.

### **Kincraig and locality Community Action Plan: Looking to 2030**

Published in November 2024, the community action plan (CNPA127) looks beyond the next two to three year timespan, focusing on what the community wanted to be by 2030. The community includes the villages and settlements of Kincraig, Insh, Dalnavert, Alvie, Feshiebridge, Lynchat, Drumguish, Speybank and Inveruglas.

The plan sets out the community's vision for the longer term (up to 10 years) across the four themes of a socially connected community; a climate conscious community; an economically thriving community; and a culturally vibrant community. No specific priority relating to housing is identified.

### **Kingussie Community Action Plan: Looking to 2030**

Published in spring 2025, the suggestions and actions collated from the community are categorised into the community action plan's (CNPA066) four themes - a socially connected community; a climate conscious community; an economically thriving community; an economically thriving community; and a culturally vibrant community. Housing related priorities and actions comprise:

- Investigating the feasibility of redeveloping St Vincents for housing (since purchased by The Highland Council for redevelopment into housing).
- Creating more housing for people who want to live and work in Kingussie (with a focus on retaining young people, repurposing unused buildings and changing the use of commercial premises).
- Supporting the redevelopment of Market Stance for affordable housing or local business units.
- Developing Talla Nan Ros into a community space, including exploring the feasibility of conversion for housing, multimedia and retail.



### **Laggan Community Action Plan: Looking to 2030**

Compiled in autumn 2022, there are three themes in the community action plan (CNPA129) - a socially connected community; a climate conscious community; and an economically thriving community. Under the socially connected community theme, one of the priorities is 'having affordable places to live'. This is defined as access to more community owned affordable housing for local young people to rent or buy; and community support to help residents and businesses make their homes more energy efficient / better insulated.

To achieve access to more affordable housing, the listed actions are to explore potential sites in the area (including Laggan Forest Trust land for housing / crofts); publish a timeline for an existing housing feasibility study; and to lobby Cairngorms National Park Authority to allow small group housing development.

### **Mount Blair Community Action Plan 2013 – 2018**

Note that the majority of the community action plan (CNPA130) area is outwith the Cairngorms National Park. The action plan community vision is to make it sustainable to live and work in the area, with good access to affordable housing, vital services and community facilities with good communication and transport systems.

### **Nethy Bridge Community Action Plan: Looking to 2030**

Compiled in autumn / winter 2023. There are four themes in the community action plan (CNPA131) - a socially connected community; a climate conscious community; an economically thriving community; and a culturally vibrant community. The first priority under 'a socially connected community' is to create more housing for people who want to live and work in Nethy Bridge. There are three aims.

The first is that a good portion of any new housing must be 'affordable' for rent or purchase and available to permanent residents and to retain key workers. It states that 25 – 40% affordable housing is not enough and there is support for the Cairngorms National Park Authority's Partnership Plan objective of up to 75%. It also states that on Nethy Bridge Proposal H1, there needs to be a push for the majority of the development to be affordable, well built and insulated – and occupied by full time residents.

The second is to investigate community owned housing projects, like Braemar and Tomintoul. Nethy Bridge Community Development Company will work with the Communities Housing Trust to identify suitable opportunities and evidence need for different housing types – for example, shared equity and mid-market rentals. In addition, to investigate a community asset transfer for provision of affordable housing for locals



with the public sector, Royal Society for the Protection of Birds (RSPB) and private landowners.

The third is to hold on to the social housing stock they do have, working with registered social landlords.

### **Newtonmore Community Action Plan: Looking to 2030**

Compiled in spring 2022, the community action plan (CNPA132) has four themes. Under the 'an economically thriving community' theme, the first priority is to 'improve support and assistance for local businesses and people trying to get to work'. This priority is for local people to be given affordable housing priority, but also for older locals who are downsizing. It aims for more social housing for young people and families and a cap on second homes. It recognises that there needs to be a balance between welcoming those with holiday homes and having accommodation for key workers in the tourism sector.

### **Strathdon Community Action Plan: Looking to 2030**

This community action plan (CNPA133) is arranged under four themes - a socially connected community; a climate conscious community; an economically thriving community; and a community for our young people.

In relation to housing, the Plan includes a priority to create more housing for people who want to live and work in Strathdon, with actions to progress a community owned housing project for affordable (rent and purchase for permanent residents) housing; and to progress discussion on wider housing issues, for example empty properties.

Creating more housing includes continuing to discuss the Lonach Hotel site, exploring different ways of taking forward affordable housing, improving Doune Court sheltered housing, renovating properties or ground, and repurposing unwanted spaces or buildings.



## Baseline of housing matters

This section sets an indicative local housing land requirement. It relates to sections 15(1A), 15(5) and 16(B), of the Town and Country Planning (Scotland) Act 1997 (as amended) (CNPA003) which require the housing needs of the population to be taken into account in the preparation of the Proposed Plan. It also summarises other matters relating to housing, including information on demographics, the housing market, housing stock, specialist housing needs, rural housing, fragile communities and the self build list.

The implications of each housing matter are set out at the end of each section and the overall implications for the Proposed Plan are collated and summarised from page 181. The implications in relation to the indicative local housing land requirement are provided from page 143 and on affordable housing from page 151.

There are links between this policy area and all other policy areas covered in the Evidence Report. Connections between relevant policy areas are highlighted throughout.

## Demographic context

### Population

Based on Scotland's Census, the estimated population of the Cairngorms National Park in 2022 was around 17,500 people (CNPA439). This is lower than the estimate in 2011, which was around 19,000 (Figure 1). However, there are several important caveats to consider when comparing these datasets, namely:

- The fact that the National Park is a non standard geography.
- Issues with the communal establishment usual population estimate in the 2011 census.

Information on these issues is presented within this supporting document (CNPA337) (see page 16):

- <https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/CNPA337-Statistical-areas-used-in-the-analysis-of-the-Cairngorms-National-Park.pdf>

The outcome of these issues is that while we may identify changes between censuses, there is uncertainty about the exact extent of those changes. Some comparisons may not be possible at all.

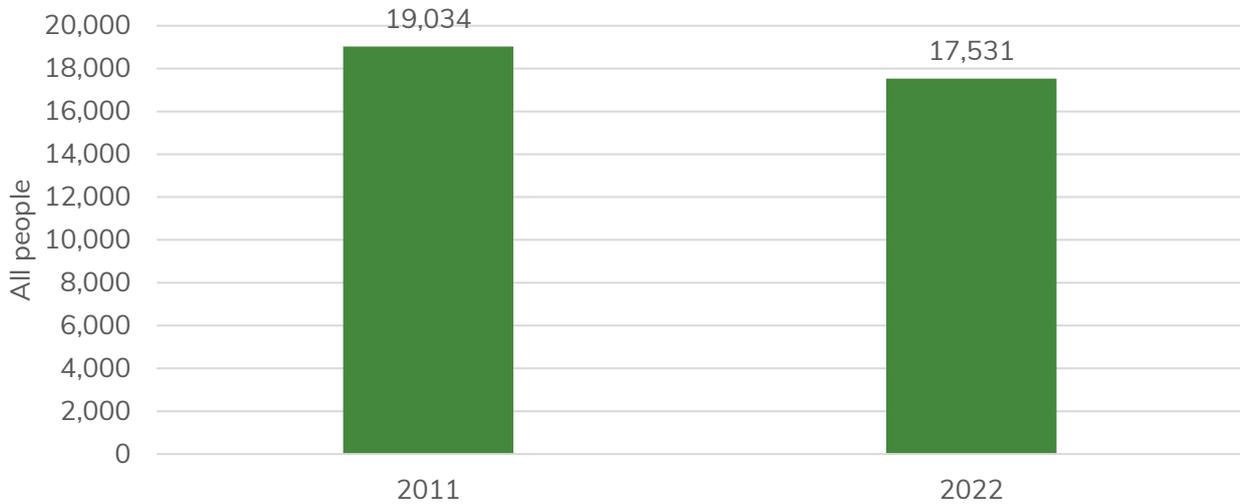


Figure 1 Population estimates for the Cairngorms National Park according to Scotland’s Census, 2011 and 2022 (Tables LC1117SC: 2011 and UV102b: 2022) (CNPA439).

Rebased mid year population estimates for small areas were published in 2025 and these may be used to provide an indication of population change at a sub National Park level over the period 2001 – 2022 (Figure 2).

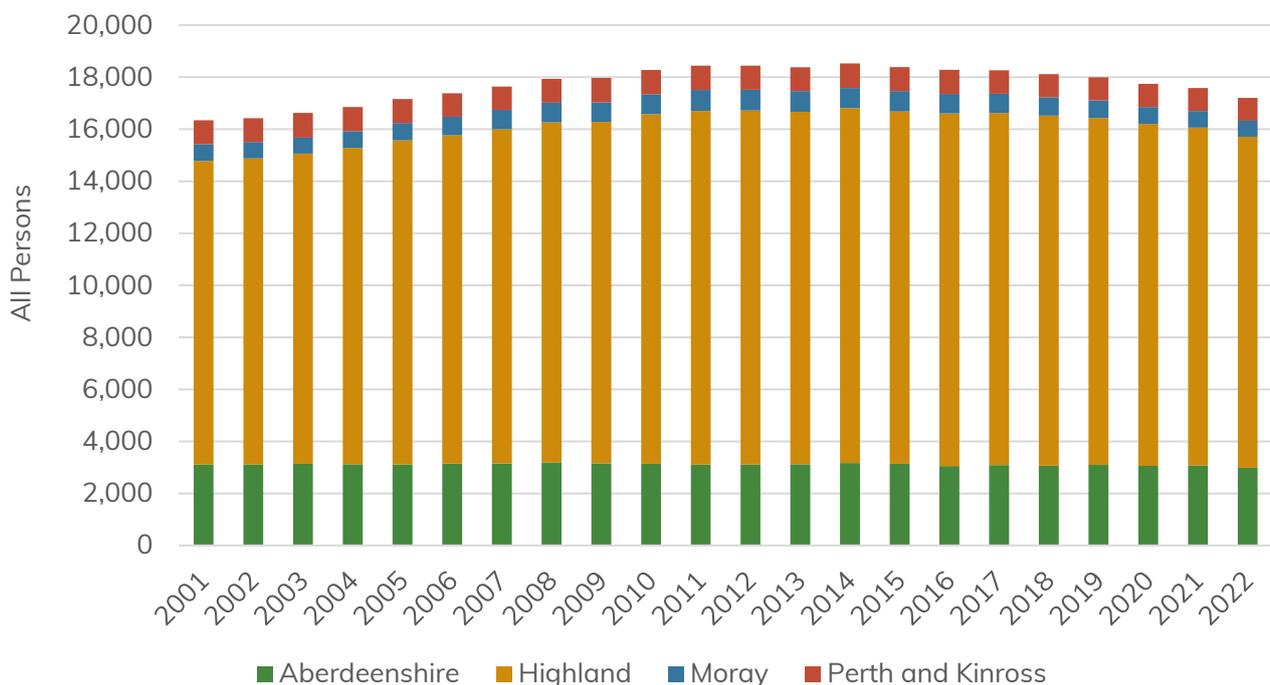


Figure 2 Small area mid-year population estimates for the Cairngorms National Park, by constituent local authority area 2001 to 2022, according to Scotland’s Census, 2011 and 2022 (National Records Scotland population estimates 2001 – 2011 and rebased population estimates 2011 - 2022) (CNPA532 and CNPA533).

The National Park’s population is unusual in that it is small and dispersed and is in clusters around the edge of the Cairngorms land mass within the council areas of



Highland, Aberdeenshire, Angus, Moray and Perth and Kinross. Around 74% (12,729 people in 2022) of the population lives in the Badenoch and Strathspey ward within Highland Council.

The rebased mid year estimates indicate that the Cairngorms National Park population has grown by 5.27% since 2001 (to 2022), which is lower than for Scotland as a whole (7.56% for the same period). In addition, growth peaked at 13.37% in 2014, since which the estimated population has reduced (Figure 3).

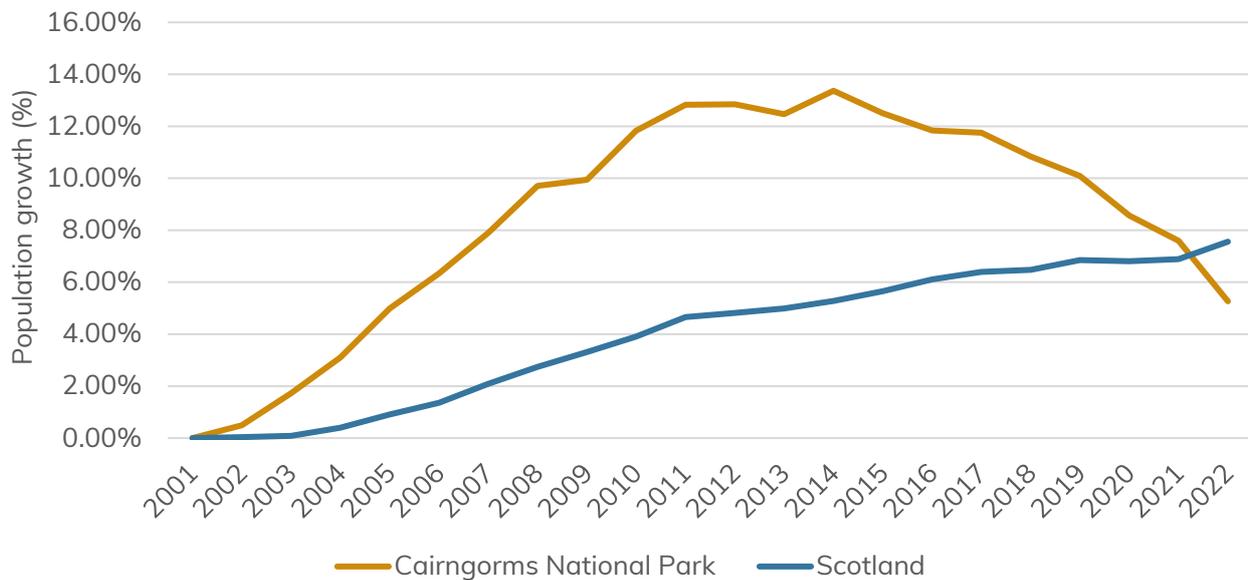


Figure 3 Comparison of population growth (%) in the National Park and Scotland, using the mid-year estimates between 2001 - 2022, from the 2001 baseline figure, with 2011 – 2022 estimate rebased in 2025 (statistics.gov.scot) (CNPA533).

This population change has not been even across all local authority areas within the National Park. The Aberdeenshire, Angus, Moray and Perth and Kinross parts of the National Park have reduced slightly (decreasing by 4.05%, 2.84% and 5.59% respectively), while the Highland area has seen an estimated increase of 9.06% (1,057 people) between 2001 and 2022. This is also where the greatest housing pressures are and where most future development is likely to be located.

The components of this population change can be calculated for the years 2002 – 2019 (Table 7 and Figure 4). This shows that deaths have exceeded births every year of this period and that the National Park’s population growth is driven by migration. Over this period, the population grew by around 10% but would have fallen by around 5.4% had no migration taken place.



Table 7 Components of population change in the Cairngorms National Park between 2001 – 2019 (statistics.scot.gov – 2025 rebased estimates 2011 - 2022) (CNPA533).

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Births	138	129	125	131	146	145	151	175	161	147	152
Deaths	195	184	208	217	185	217	181	228	177	181	202
Natural change (births - deaths)	-57	-55	-83	-86	-39	-72	-30	-53	-16	-34	-50
Mid-year estimates	16,346	16,426	16,628	16,853	17,161	17,381	17,638	17,933	17,971	18,280	18,443
Gross annual population change		80	202	225	308	220	257	295	38	309	163
Net-migration		135	285	311	347	292	287	348	54	343	213

	2012	2013	2014	2015	2016	2017	2018	2019	Change 2001 - 2019	Total 2011 - 2019
Births	152	151	137	134	141	137	118	125	2,557	1,247
Deaths	171	214	175	182	184	205	152	185	3,448	1,670
Natural change (births - deaths)	-19	-63	-38	-48	-43	-68	-34	-60	-891	-423
Mid-year estimates	18,446	18,384	18,531	18,390	18,281	18,267	18,118	17,995		
Gross annual population change	3	-62	147	-141	-109	-14	-149	-123	1,649	-285
Net-migration	22	1	185	-93	-66	54	-115	-63	2,540	138

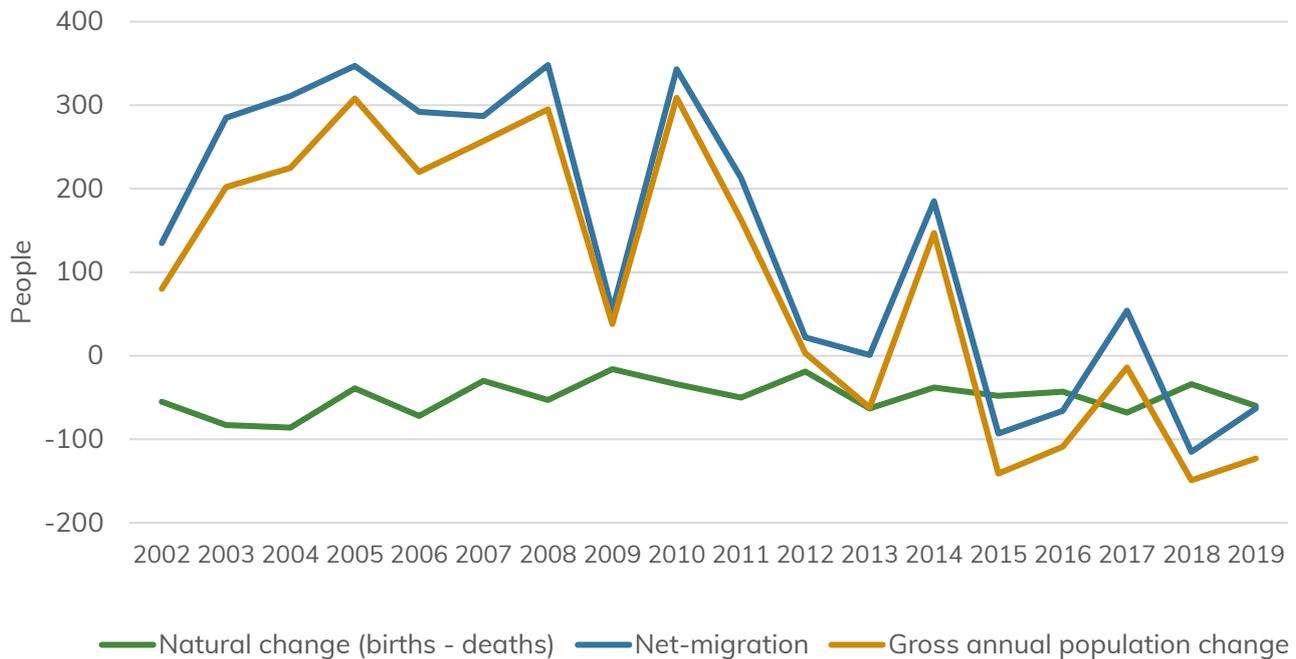


Figure 4 Gross annual population change and its constituent components in the Cairngorms National Park from 2002 - 2019 (statistics.gov.scot) (CNPA533).

A more detailed analysis of population shrinkage is covered under this schedule’s section on resettlement and fragile communities (see page 170).

Population projections for the National Park are produced by National Records of Scotland (CNPA533), with the most recent being 2018 based projections (Figure 5)<sup>7</sup>. National Records of Scotland prepare a range of projections, based on past trends. The projections use three different levels of migration, known as ‘low migration’, ‘principal’ and ‘high migration’. The principal projection for the Cairngorms National Park is that between 2018 and 2043, the population will grow from 19,045<sup>8</sup> to 19,961, an increase of 4.8% over 25 years. The high migration projection is that the population will increase to 20,381 (an increase of 7%).

<sup>7</sup> 2022 based subnational population projections were published by National Records of Scotland on 30 September 2025. These provide data by local authority and National Health Service board areas. Data for National Parks is expected to be published later this year, hence the most recent remain the 2018 based population projections.

<sup>8</sup> The reason that the National Records Scotland’ population estimate for 2018 is higher than the 2022 mid-year estimate quoted above is due to differences in the way small population areas are aggregated. See footnote 2 and the background paper on the statistical areas used in the analysis of the Cairngorms National Park (CNPA337) for details: <https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/Statistical-areas-used-in-the-analysis-of-the-Cairngorms-National-Park.pdf>

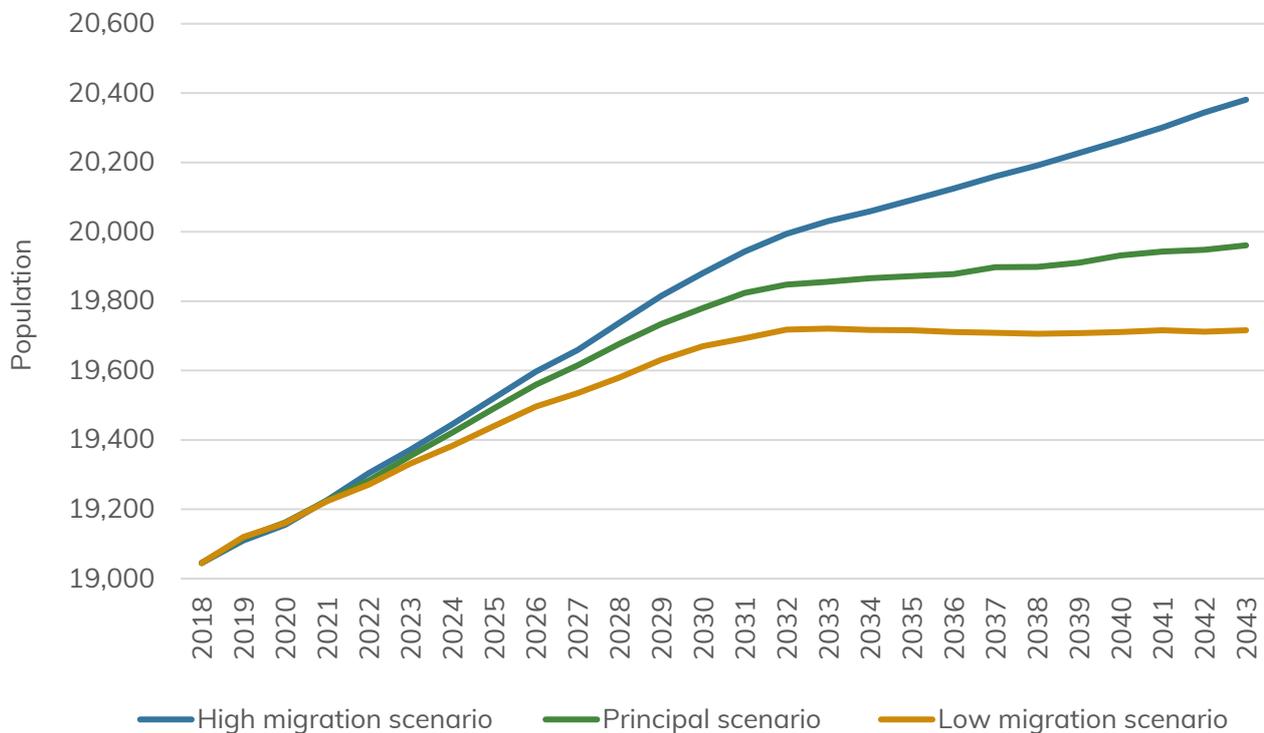


Figure 5 Population projections –projected population growth in the Cairngorms National Park from 2018-2043 under the low migration, principal and high migration projection scenarios (statistics.gov.scot) (CNPA533).

This projection contrasts with the 2016 based projection, which projected a decrease of around 4% between 2016 and 2041. This highlights the limitations of population projections, especially in an area such the Cairngorms National Park, which has a small population.

Within the anticipated 10 year period of the new Local Development Plan (2027 – 2037), the 2018 based principal scenario population projection forecasts a population increase of 283 people (from 19,615 to 19,898).

A projection is a calculation showing what happens if assumptions are made. The population projections are trend based. They are not policy based forecasts of what the government expects to happen. Many social and economic factors influence population change, including policies adopted by both central and local government. The relationships between the various factors are complex and largely unknown.

Within the Cairngorms National Park, migration assumptions are more critical than the fertility and mortality assumptions.



The National Records of Scotland data also give an indication of how the age structure of the population is likely to change (Figure 6). According to the principal migration scenario:

- The number of children aged under 16 years is projected to decrease by 19.7% from 2,828 in 2018 to 2,272 in 2043. In comparison, across Scotland, the number of children under 16 years is projected to decrease by 10.5%. The decrease in the Cairngorms National Park between 2027 and 2037 is projected to be 93 children (4%).
- The number of people of working age is projected to decrease from 11,588 in 2018 to 10,916 in 2043, representing a 5.8% reduction. The number of people of working age in Scotland is expected to decrease by 3.8%. The decrease in the Cairngorms National Park between 2027 and 2037 is projected to be 533 working age people (5%).
- The population of people of pensionable age is projected to rise by 46.3% from 4,629 in 2018 to 6,773 in 2043. Across Scotland, the population of pensionable age in the is expected to rise by 35.5%. The increase in the Cairngorms National Park between 2027 and 2037 is projected to be 909 people of pensionable age (16%).

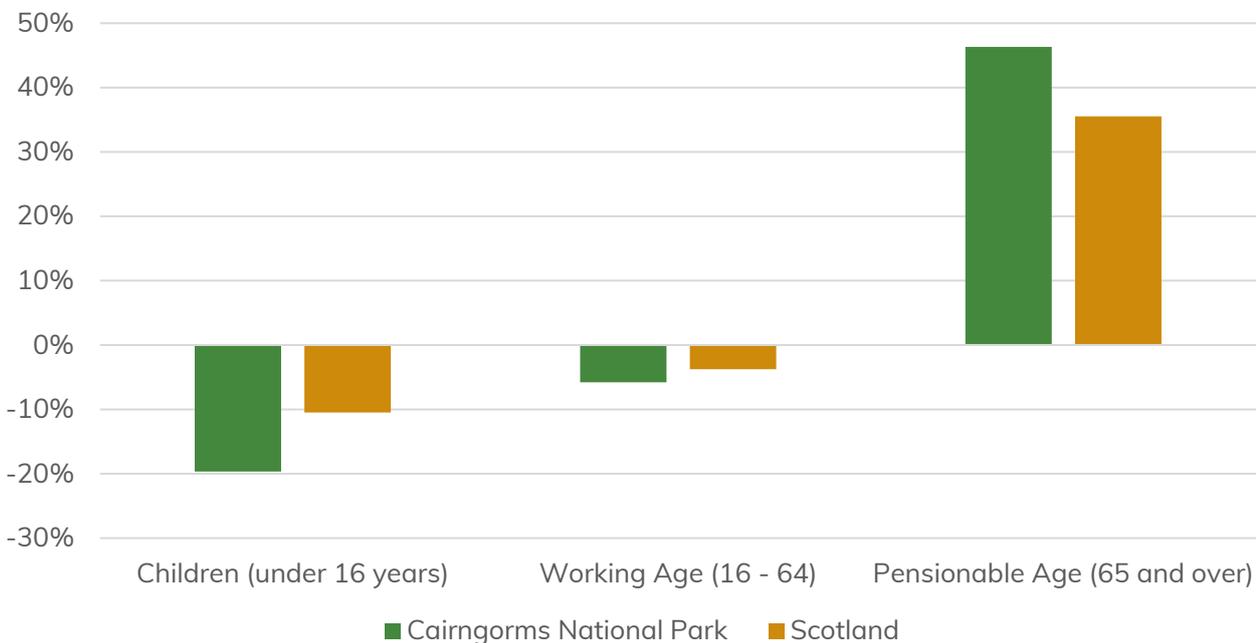


Figure 6 Comparison of the estimated percentage change in population, by age group cohort, in the Cairngorms National Park and Scotland between 2018 and 2043 (statistics.gov.scot) (CNPA533).

Figures 8 and 9 show the estimated population profile by age and gender in the Cairngorms National Park in 2018 and 2043. Under this estimate, 34% of the population



of the Cairngorms National Park would be over 65 years in 2043, and 12% over 80 years (an increase of 123%).

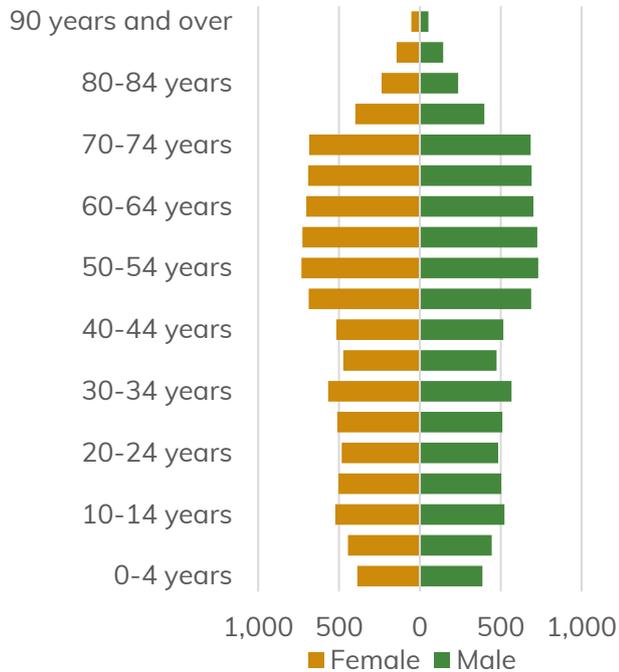


Figure 7 2018 estimated population profile by age and gender in the Cairngorms National Park (statistics.gov.scot) (CNPA533).

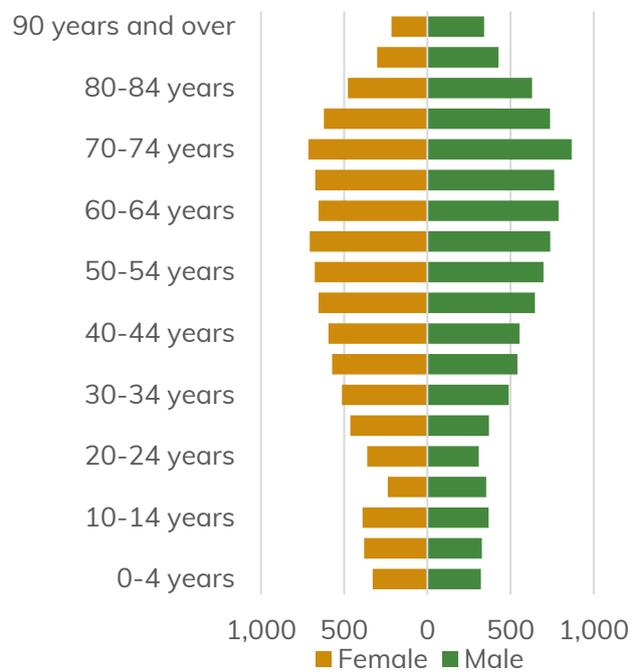


Figure 8 2043 estimated population profile by age and gender in the Cairngorms National Park (statistics.gov.scot) (CNPA533).

New population projections are due to be published by National Records Scotland later in 2025. The implications of any new data will be considered during the preparation of the Proposed Plan.

## Households

According to Scotland's Census (CNPA439), the estimated number of households in the Cairngorms National Park remained relatively stable between 2011 and 2022 at around 8,450 households (Figure 9). The size of households has fallen, with an increase in the number of one and two person households (Figure 10). This represents a fall in the average household size from around 2.25 in 2011 to around 2.07 in 2022. This compares to a fall across Scotland from around 2.23 to around 2.17 over the same period.

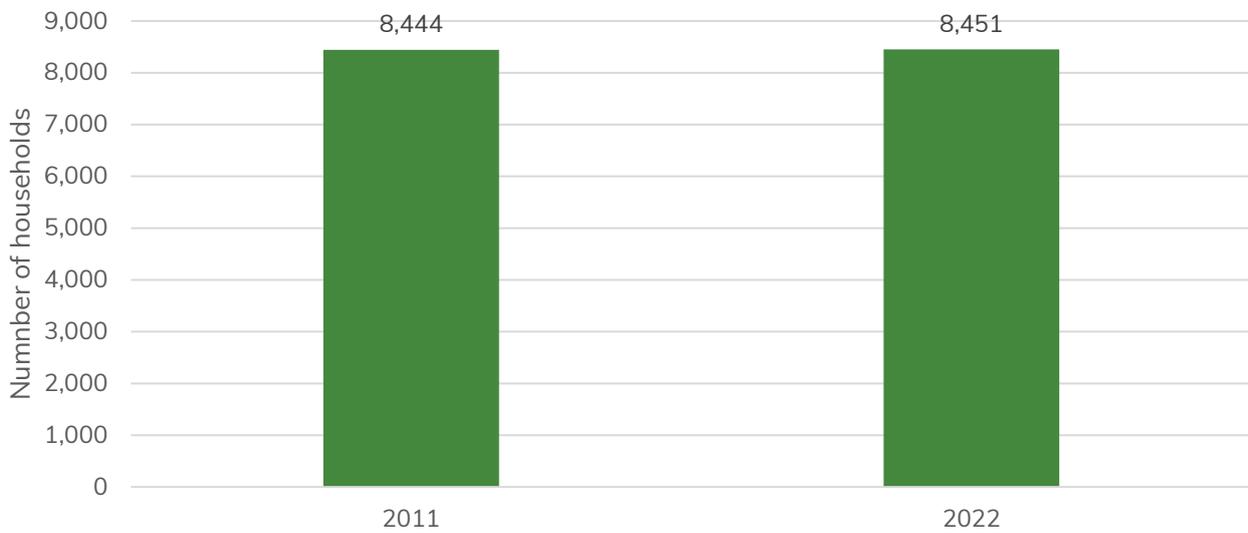


Figure 9 Estimated number of households in the Cairngorms National Park 2011 – 2022 (Census tables KS105CS and UV113) (CNPA439).

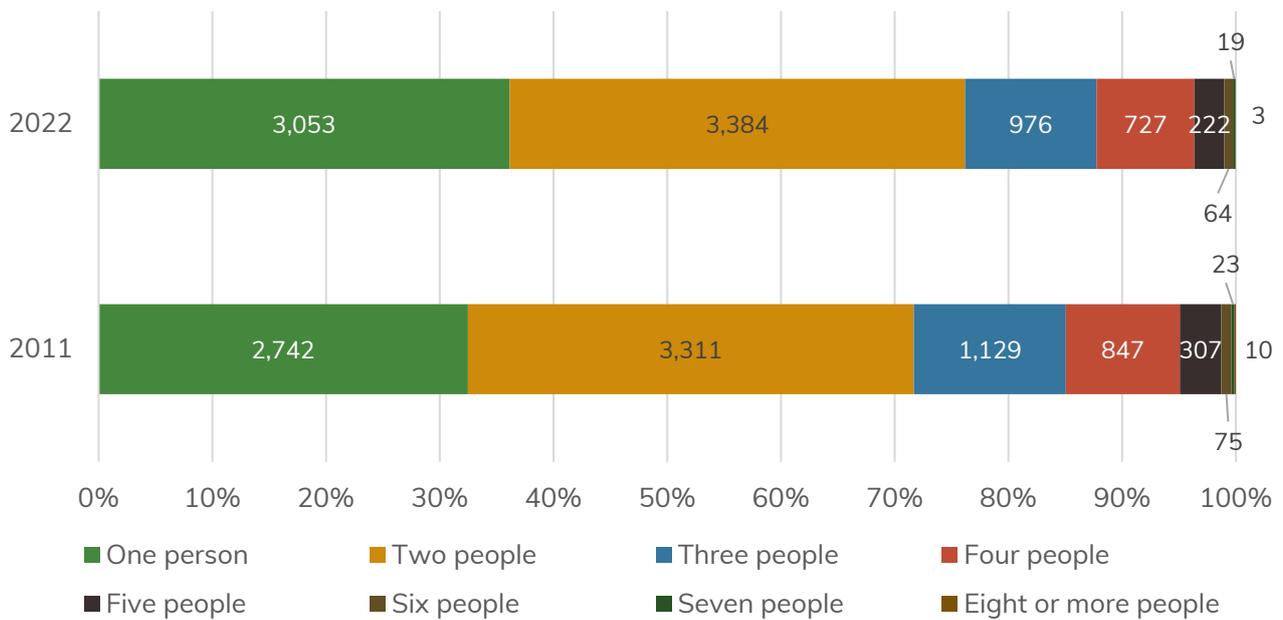


Figure 10 Estimated size of households in the Cairngorms National Park 2011 – 2022 (Census tables QS406 SC and UV406) (CNPA439).

The National Record for Scotland’s 2018 based household principal scenario projection<sup>9</sup> estimates that the number of households in the Cairngorms National Park will increase

<sup>9</sup> 2022 based household projections were published by National Records of Scotland on 16 December 2025. These provide data by local authority. Data for National Parks is expected to be published later this year, hence the most recent remain the 2018 based household projections.



by 14.8% between 2018 and 2043. The high migration scenario predicts an increase of 16%.

Note that these figures are significantly higher than the population growth (4.5% for the principal scenario, 7.0% for the high migration scenario) predicted over the same period. This is because average household size is expected to fall.

The decreasing average household size is reflected in the changes in the number of households in each household type (Table 8 and Figure 11). Single adult households represent the largest projected change, anticipated to increase by around 27% by 2043, while two adult households are expected to increase by around 18%. This compares to a projected decrease in the number of households containing children.

A likely driver in the number of households without children, and of decreasing household size, is the growth in the number of older people – because people are living longer. The gap between the average life expectancy of men and women in Scotland is also narrowing. This means that the number of older men living alone is projected to increase more rapidly than the number of older women.

Table 8 Household projections for the Cairngorms National, by type of household, principal scenario 2018 and 2043 (statistics.gov.scot) (CNPA533).

Household Type	2018	2043	Change 2018-2043	
1 adult	2,804	3,560	+756	27.0%
2 adults	3,251	3,821	+570	17.5%
1 adult with children	433	425	-8	-1.8%
2+ adults with children	1,588	1,535	-53	-3.3%
3+ adults	606	622	16	2.6%
All households	8,682	9,963	+1,281	14.8%

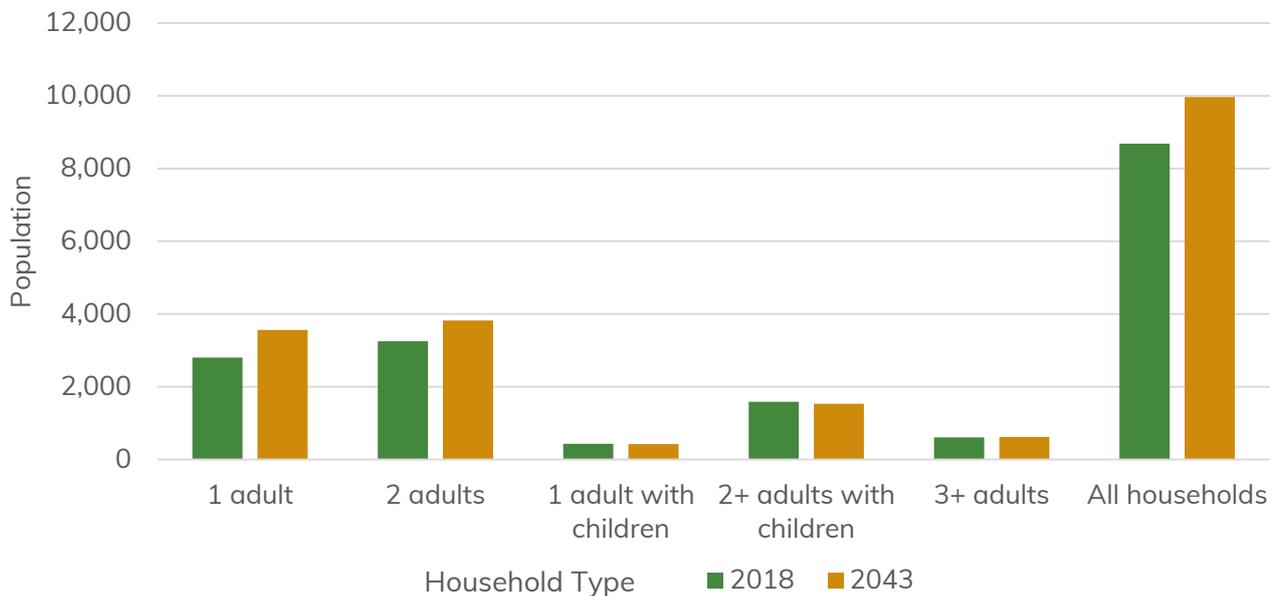


Figure 11 Household projections for the Cairngorms National, by type of household, principal scenario 2018 and 2043 (statistics.gov.scot) (CNPA533).

Table 9 shows the household projections for the Cairngorms National Park under the high migration scenario. As with the principal scenario, nearly all of the growth is from households without children. The overall household growth would be 16%.

Table 9 Household projections for the Cairngorms National Park, by type of household, high migration scenario 2018 and 2043 (statistics.gov.scot) (CNPA533).

Household Type	2018	2043	Change 2018-2043	
1 adult	2,804	3,570	+766	27.3%
2 adults	3,251	3,849	+598	18.4%
1 adult with children	433	440	+7	1.6%
2+ adults with children	1,588	1,585	-3	-0.2%
3+ adults	606	631	25	4.1%
All households	8,682	10,075	+1,393	16.0%

Household estimates and projections are important as they offer a useful starting point in informing the National Park Authority’s housing land requirement. These need to be interpreted and considered alongside other factors and trends, including housing need and demand as well as supply. Jointly, these combine to inform the new housing land requirement that the Cairngorms National Park Authority will need to identify and the type of housing that is required to be provided.

In the 10 year period of the new Local Development Plan (2027 – 2037), the number of households is projected to increase by 487.



New household projections are due to be published by National Records Scotland in 2026. The implications of any new data will be considered during the preparation of the Proposed Plan.

### **Implications of the demographic context**

The population and the number of households in the Cairngorms National Park is projected to continue to grow through in-migration, albeit at a slower rate than in the past. The population is continuing to age and average household size will continue to fall.

The Proposed Plan will need to address these demographic changes through its local housing land requirement and through the formulation of planning policy which provides a diverse range and choice of housing. This includes dwellings suitable for smaller households which may enable older people to downsize and housing to support the working population.

Evidence relating to the range and choice of housing required is considered throughout this schedule, with specialist housing for older people discussed from page 153.

### **Housing market context**

#### **Lower quartile and median house prices**

Scottish Government statistics indicate that between 1993 and 2023, the median price of a dwelling in Scotland rose from £46,000 to £185,000, an increase of around 300%. In the same period, the median house price of a property in the Cairngorms National Park increased by around 375% from £56,000 to £265,750.

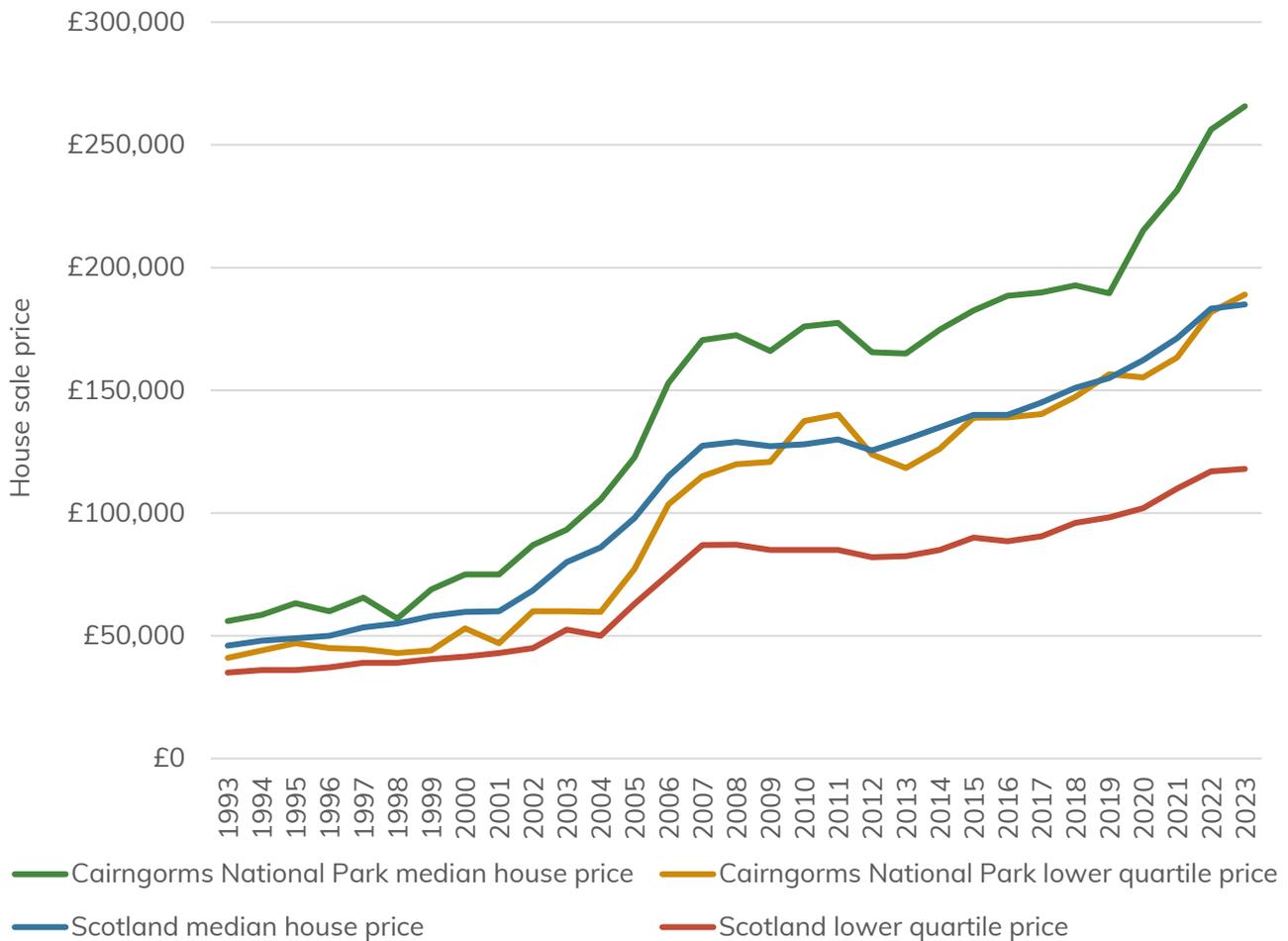


Figure 12 Median and lower quartile house prices for both the Cairngorms National Park and Scotland between 1993 and 2023 (statistics.gov.scot) (CNPA533).

Figure 12 shows this increase diagrammatically, with median house prices in the National Park and Scotland increasing at a broadly similar rate between 1993 and 2004 and 2009 and 2019, but greater growth in the Cairngorms National Park between 2005 and 2008 and between 2020 and 2023. The 2020 – 2023 growth is likely caused by pandemic driven counter urbanisation (the movement of people from urban to rural areas) and mirrors the trend seen across the United Kingdom for price rises in rural and coastal areas of high amenity value<sup>10</sup>.

<sup>10</sup> Rural planning in the 2020s: technical report 2 – Analysis of rural housing market change, Royal Town Planning Institute (June 2022) (CNPA554).



Median house prices 2023

- £150,000 - £200,000
- £200,000 - £250,000
- £250,000 - £300,000
- £300,000 - £350,000
- £350,000 - £400,000
- £400,000 - £425,000

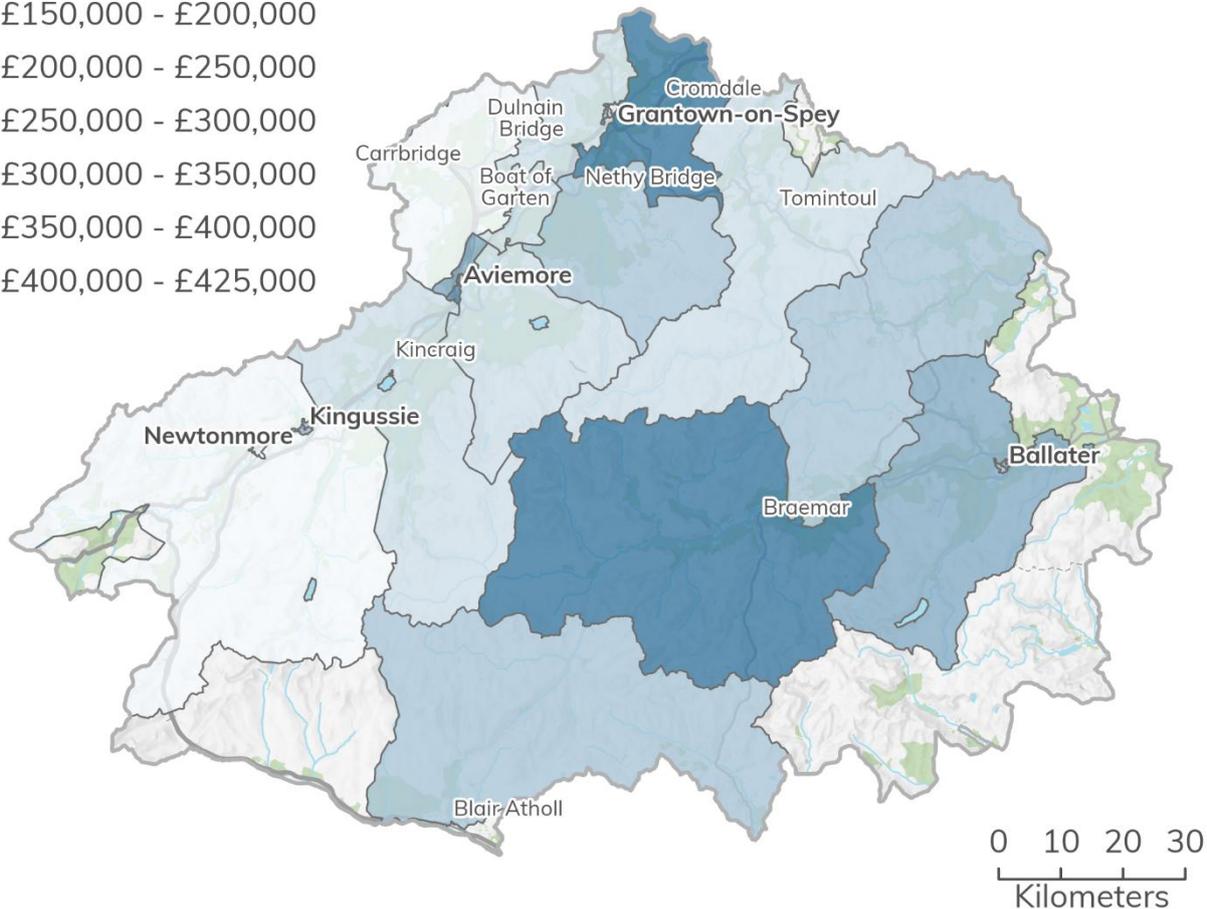


Figure 13 Median house prices by 2011 data zone in the Cairngorms National Park 2023. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © statistics.gov.scot, 2026 (CNPA533).

Lower quartile house prices in Scotland rose from £35,000 in 1993 to £118,000 in 2023. This is an increase of around 235%, lower than the median house price rise across Scotland, indicating a broader spread of house prices. In the Cairngorms National Park however, the increase has been significantly greater, and similar to the growth in the median house price. The lower quartile house price has increased by around 360% from £41,000 in 1993 to £189,000 in 2023 (Figure 12).



Lower quartile house prices 2023

- £125,000 - £150,000
- £150,000 - £175,000
- £175,000 - £200,000
- £200,000 - £250,000
- £250,000 - £300,000

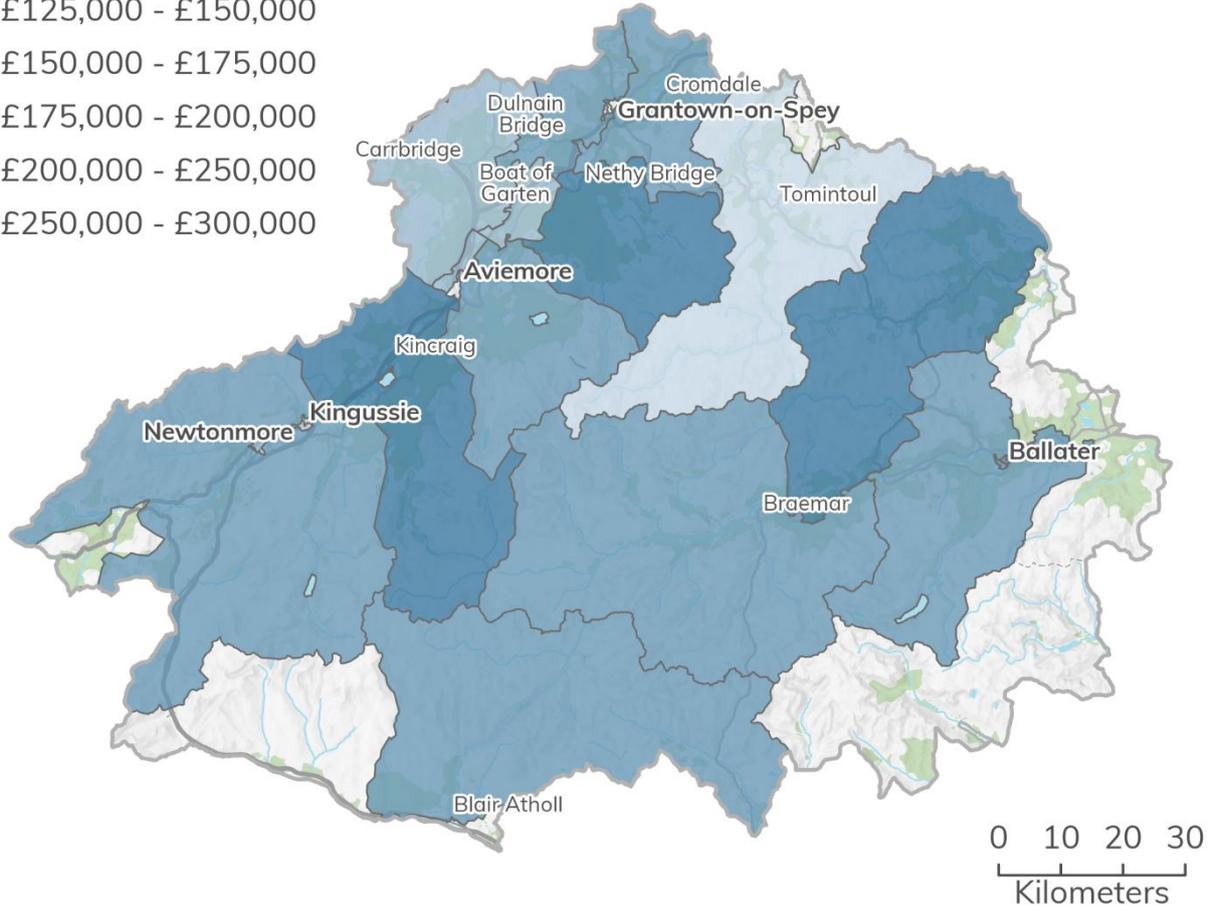


Figure 14 Lower quartile house prices by 2011 data zone in the Cairngorms National Park 2023. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © statistics.gov.scot, 2026 (CNPA533).

Table 10 and Table 11 tabulate the growth in the lower quartile and median house prices respectively in the Cairngorms National Park and Scotland as a whole.



Table 10 Comparison of Cairngorms National Park and Scotland annual lower quartile house prices between 1993 and 2023 (statistics.gov.scot) (CNPA533).

Year	Cairngorms National Park lower quartile house price	Growth in Cairngorms National Park lower quartile house price since 1993	Scotland lower quartile house price	Growth in Scotland lower quartile house price since 1993	Percentage difference between Cairngorms National Park and Scotland lower quartile house price
1993	£41,000		£35,000		17.1%
1994	£44,000	7.3%	£36,000	2.9%	22.2%
1995	£47,000	14.6%	£36,000	2.9%	30.6%
1996	£44,999	9.8%	£37,100	6.0%	21.3%
1997	£44,500	8.5%	£39,000	11.4%	14.1%
1998	£43,000	4.9%	£39,000	11.4%	10.3%
1999	£44,000	7.3%	£40,500	15.7%	8.6%
2000	£53,000	29.3%	£41,500	18.6%	27.7%
2001	£47,000	14.6%	£43,000	22.9%	9.3%
2002	£60,000	46.3%	£45,000	28.6%	33.3%
2003	£60,000	46.3%	£52,500	50.0%	14.3%
2004	£59,763	45.8%	£50,000	42.9%	19.5%
2005	£77,225	88.4%	£63,000	80.0%	22.6%
2006	£103,506	152.5%	£75,000	114.3%	38.0%
2007	£115,000	180.5%	£87,000	148.6%	32.2%
2008	£119,875	192.4%	£87,121	148.9%	37.6%
2009	£120,875	194.8%	£85,000	142.9%	42.2%
2010	£137,500	235.4%	£85,000	142.9%	61.8%
2011	£140,125	241.8%	£85,000	142.9%	64.9%
2012	£123,875	202.1%	£82,000	134.3%	51.1%
2013	£118,375	188.7%	£82,500	135.7%	43.5%
2014	£126,199	207.8%	£85,000	142.9%	48.5%
2015	£138,813	238.6%	£90,000	157.1%	54.2%
2016	£139,000	239.0%	£88,500	152.9%	57.1%
2017	£140,313	242.2%	£90,500	158.6%	55.0%
2018	£147,375	259.5%	£96,000	174.3%	53.5%
2019	£156,538	281.8%	£98,249	180.7%	59.3%
2020	£155,250	278.7%	£102,000	191.4%	52.2%
2021	£163,375	298.5%	£110,000	214.3%	48.5%
2022	£181,875	343.6%	£117,000	234.3%	55.4%
2023	£189,000	361.0%	£118,000	237.1%	60.2%



Table 11 Comparison of Cairngorms National Park and Scotland annual median house prices between 1993 and 2023 (statistics.gov.scot) (CNPA533).

Year	Cairngorms National Park median house price	Growth in Cairngorms National Park median house price since 1993	Scotland median house price	Growth in Scotland median house price since 1993	Percentage difference between Cairngorms National Park median and Scotland median house price
1993	£56,000		£46,000		21.7%
1994	£58,500	4.5%	£48,000	4.3%	21.9%
1995	£63,250	12.9%	£49,000	6.5%	29.1%
1996	£60,000	7.1%	£50,000	8.7%	20.0%
1997	£65,500	17.0%	£53,400	16.1%	22.7%
1998	£57,000	1.8%	£55,000	19.6%	3.6%
1999	£68,876	23.0%	£58,000	26.1%	18.8%
2000	£75,000	33.9%	£59,750	29.9%	25.5%
2001	£75,000	33.9%	£60,000	30.4%	25.0%
2002	£87,000	55.4%	£68,500	48.9%	27.0%
2003	£93,250	66.5%	£80,053	74.0%	16.5%
2004	£105,563	88.5%	£86,000	87.0%	22.7%
2005	£122,750	119.2%	£98,000	113.0%	25.3%
2006	£153,000	173.2%	£115,000	150.0%	33.0%
2007	£170,500	204.5%	£127,450	177.1%	33.8%
2008	£172,500	208.0%	£129,000	180.4%	33.7%
2009	£166,000	196.4%	£127,233	176.6%	30.5%
2010	£176,000	214.3%	£128,000	178.3%	37.5%
2011	£177,500	217.0%	£129,995	182.6%	36.5%
2012	£165,500	195.5%	£125,500	172.8%	31.9%
2013	£164,975	194.6%	£130,000	182.6%	26.9%
2014	£174,750	212.1%	£135,000	193.5%	29.4%
2015	£182,500	225.9%	£140,000	204.3%	30.4%
2016	£188,500	236.6%	£140,000	204.3%	34.6%
2017	£189,875	239.1%	£145,000	215.2%	30.9%
2018	£192,750	244.2%	£151,000	228.3%	27.6%
2019	£189,563	238.5%	£155,000	237.0%	22.3%
2020	£215,083	284.1%	£162,261	252.7%	32.6%
2021	£231,500	313.4%	£171,225	272.2%	35.2%
2022	£256,250	357.6%	£183,300	298.5%	39.8%
2023	£265,750	374.6%	£185,000	302.2%	43.6%



Figure 15 illustrates the range of median house prices across the Cairngorms National Park data zones for each year from 1993 – 2023. It shows that there is considerable variation in house prices within the National Park, and that the variation in house prices has widened, particularly within the upper quartile (CNPA533).

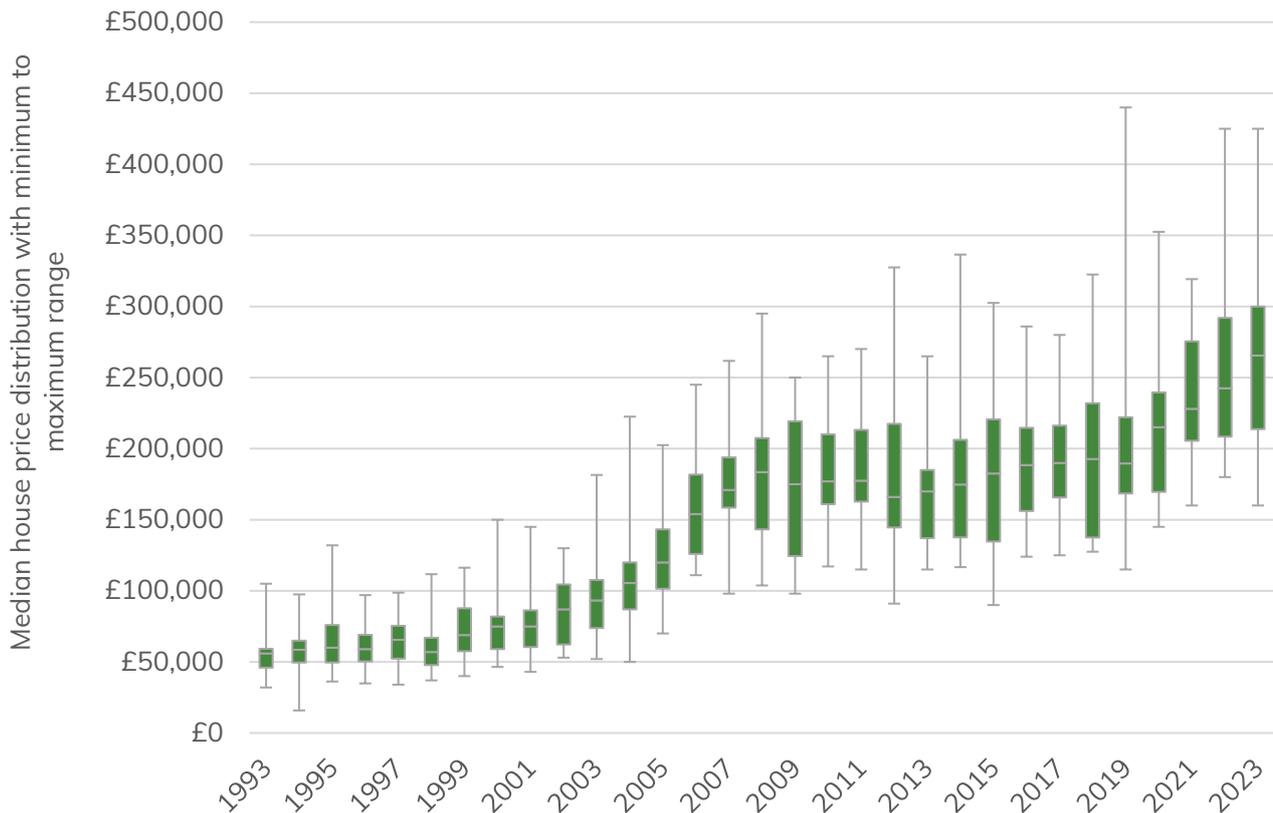


Figure 15 Box plots of median house prices for data zones within the Cairngorms National Park 1993 – 2023 (Statistics.gov.uk<sup>11</sup>) (CNPA533).

### House price to income ratios

Higher house prices are significantly impacting on affordability in the National Park. Figure 16 shows that the increase in the median house price has been far greater than the increase in the median gross household income. The 2021 median house price to median gross income ratio is nearly six times in the National Park compared to the Scottish equivalent ratio of 4.2.

In 2003, a theoretical annual income of £23,979 was needed to purchase a property at this level (based on standard lending calculations) but in 2023 this had increased to

<sup>11</sup> The median house price is the midpoint between the highest and lowest house prices recorded in the National Park.



£68,336. However, the actual median gross income in 2023 was around £42,500<sup>12</sup> meaning there was a shortfall of around £28,800 in the income required to be able to purchase a median priced home.

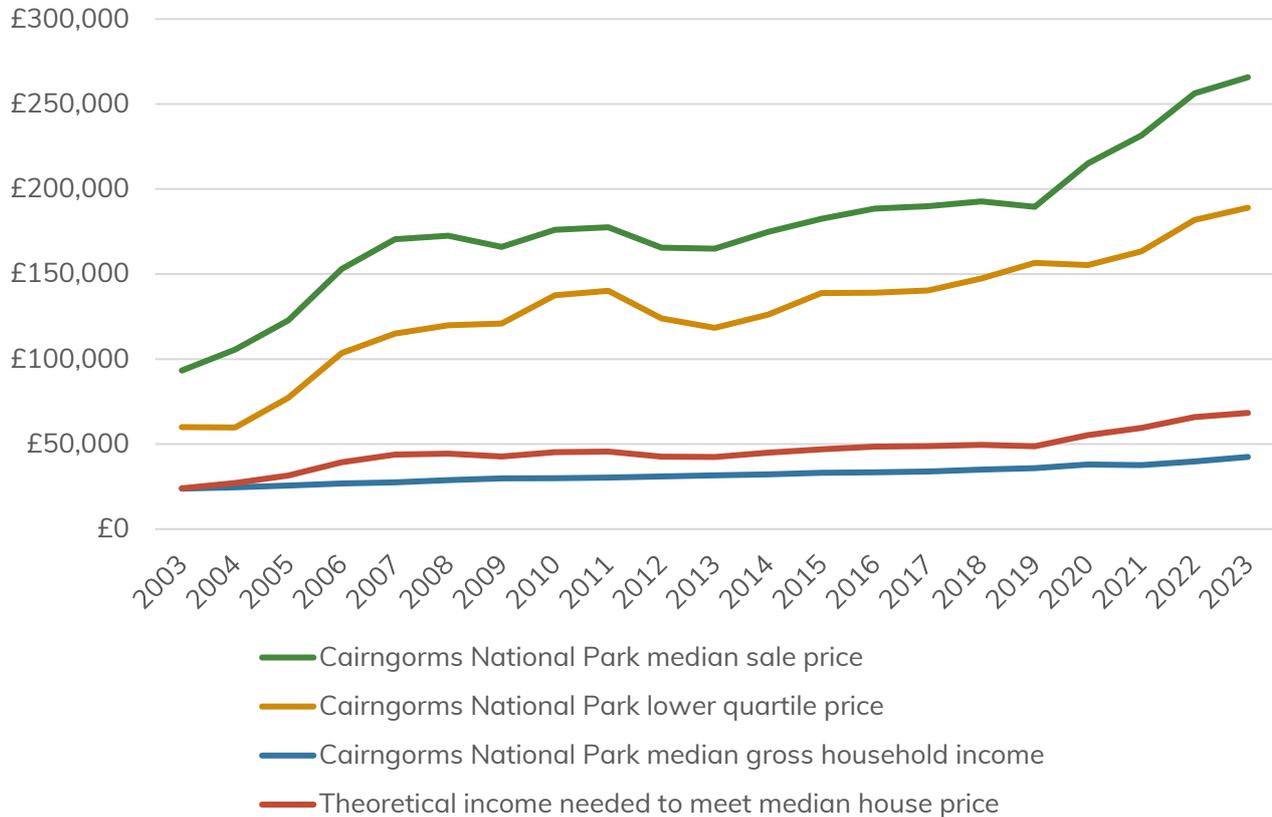


Figure 16 Median house price to median income in the Cairngorms National Park from 2003 to 2023 (statistics.gov.scot / Nomis) (CNPA533).

The median house price to household income ratio is a key indicator of affordability. It varies across the National Park. In 2023, the areas with the highest ratios were around parts of Ballater (10.2), Braemar (9.6), and Kincaig (9.2).

<sup>12</sup> The median gross income is based on the estimated median incomes for the data zones within the National Park. While not specific to the National Park, they are the closest indication of what household incomes are. The Highland Council's Housing Needs and Demand Assessment does include median income estimates for Badenoch and Strathspey, which in 2018 was £34,320. This was an increase of 10% from 2014 (£31,200), which was the highest increase across the Highland region. Aberdeenshire Council's Housing Need and Demand Assessment also estimates the annual household income as £34,320 (with a lower quartile figure of £20,800 based on 2018 figures) for the part of Aberdeenshire within the National Park.



Median house price to income ratio 2023

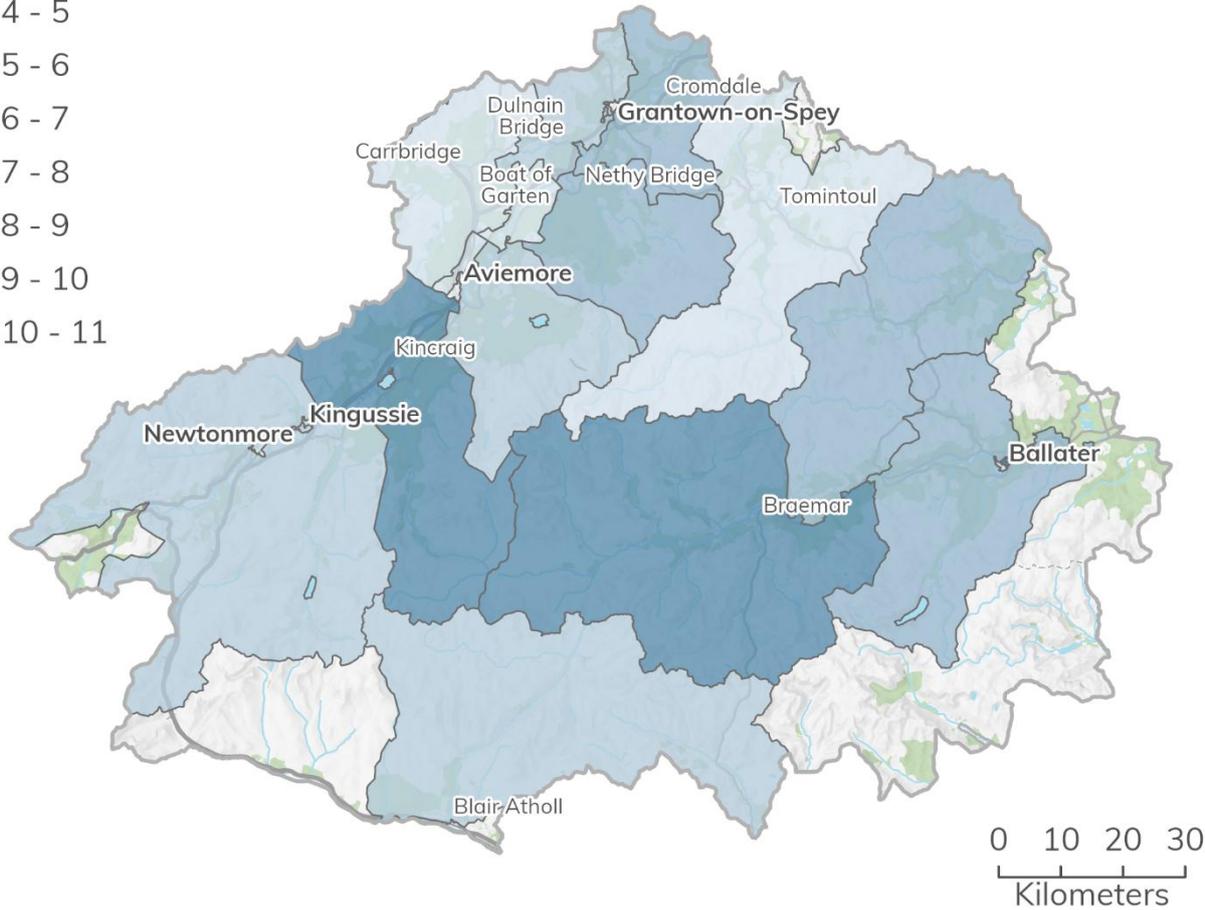
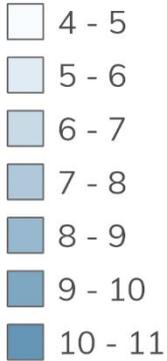


Figure 17 Median house price to median gross household income ratio by 2011 data zone in the Cairngorms National Park 2023. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © statistics.gov.scot and Nomis 2026 (CNPA533).

**Implications of the housing market context**

The growing disparity between household incomes and the income needed to be able to afford a lower quartile or median priced house means that it is increasingly difficult for people employed within the National Park to purchase a home here. The Proposed Plan will need to address these housing market challenges through maximising the delivery of affordable housing. The implications of the evidence for affordable housing are set out from page 151.



## Housing stock characteristics

### Number of houses

The number of dwellings in the National Park is estimated to have grown from 9,722 to 10,542 between 2008 and 2023 (an increase of around 10.5%). These numbers are derived from the 'household estimates' dataset which is based on Council Tax data collected for 2011 data zones (statistics.gov.scot) (CNPA532). This dataset also contains information on the number of these dwellings which are occupied (which is considered to indicate the number of households), which are used as second homes, or are vacant. This is explored in this section.

### Type of houses

Figure 18 illustrates the proportions of different dwelling types for all tenures that make up the housing stock in the National Park compared to Scotland as a whole. This is derived from the 'dwellings by type' dataset, which is based on a different Council Tax data source – the valuation list. Data for 2018 onwards is not currently available.

It highlights that detached homes account for a far greater proportion of dwellings in the National Park (52%) than in Scotland as a whole (21%). This may partly indicate why property in the Cairngorms National Park is more expensive than Scotland as a whole. There are similar proportions of semi detached homes in the National Park (23%) and Scotland as a whole, however 7% fewer terraced housing and 27% fewer flats in the National Park compared to Scotland (20% and 38% respectively).

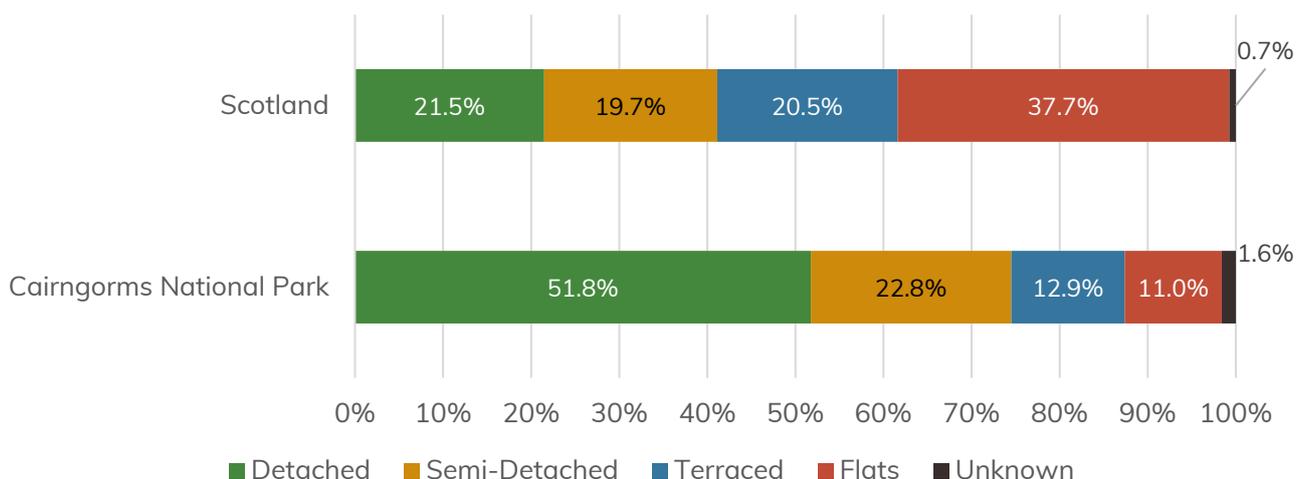


Figure 18 Proportion of house types within Scotland and the National Park (2017) (statistics.gov.scot) (CNPA533).



While the next section on new builds explores this in more detail, Figure 19 shows the extent to which each of the different housing types have changed between 2006 and 2017.

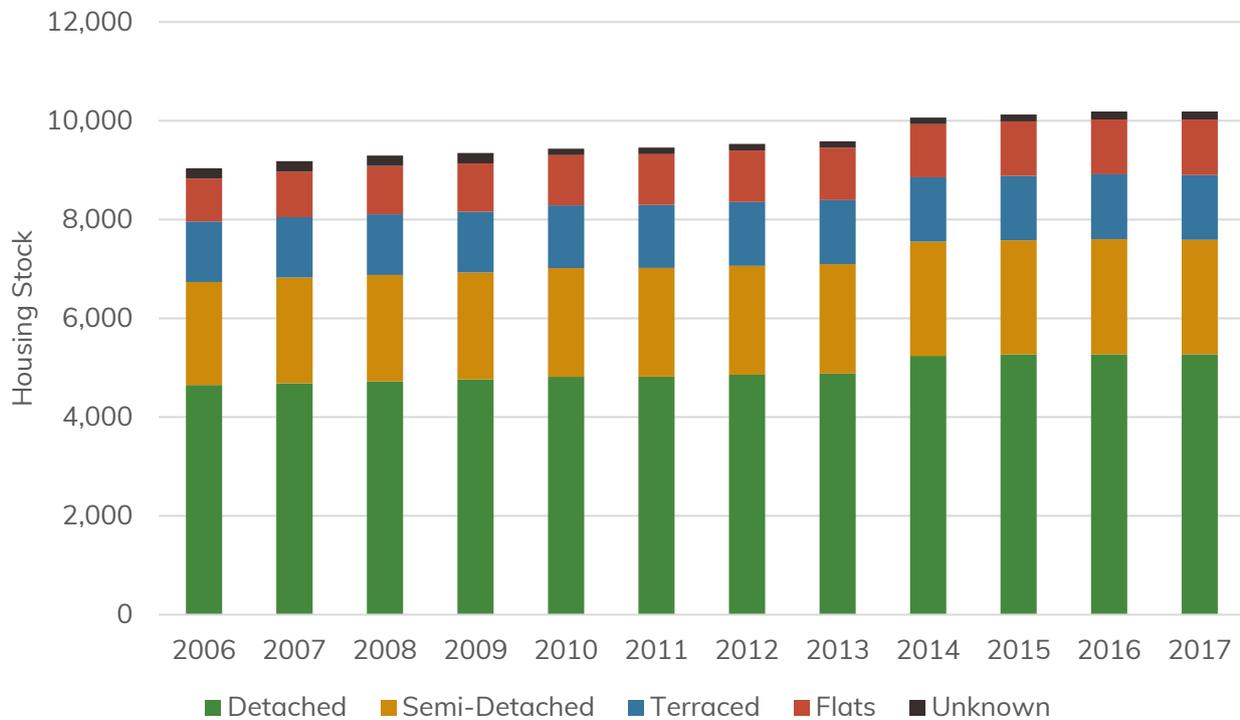


Figure 19 Total number of different house types in the Cairngorms National Park between 2006 and 2017 (statistics.gov.scot) (CNPA533).

Based on this data, the number of detached homes increased from 4,650 to 5,272 (an increase of 13.4%). Semi detached and terraced homes (accounting for 2,087 and 1,225 homes respectively in 2006) saw a slightly lower increase of 11% and 7% over the same period. While flats form the smallest proportion of house type, they saw the greatest increase from 867 in 2006 to 1,110 in 2017 – an increase of nearly 30%.

The ‘unknown’ housing types have decreased by 21% although in real terms this is a relatively small ‘loss’ of 45 homes across this National Park. This could be attributed to several reasons such as a change of use or a property being reassigned into one of the other categories. However, due to the tiny contribution that this makes to the overall housing numbers, it is not considered significant.

While this data positively shows that there has been a considerable increase in the number of flats, it is evident that detached homes continue to increase and form the most significant housing type in the National Park.



The annual data derived from council tax can be supplemented and supported by Census data, which provides information on house type for occupied households in 2022 (Figure 20). Census data does not consider all properties, just those that house usual residents at the time the Census was undertaken, therefore the two datasets do not exactly match. Nevertheless, it demonstrates that little has changed in this aspect of the National Park's housing stock since the 2017, which represents the latest available council tax data.

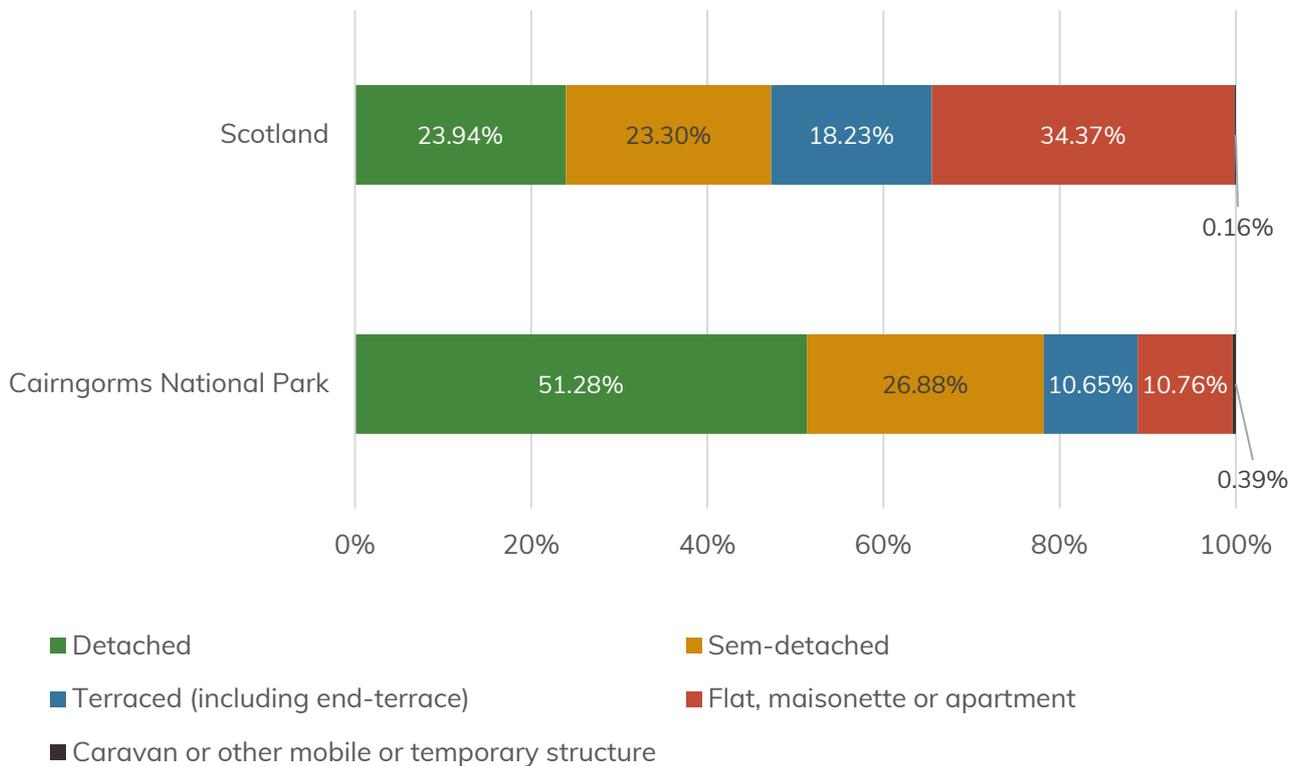


Figure 20 Proportion of house types by occupied households within Scotland and the National Park in 2022 (Census table UV402) (CNPA439).

Council Tax data can also provide an indication of affordability since bands are based on the value of property. Properties are put into one of eight bands (A - H), based on their value in April 1991, with band A being the least lowest value homes, and band H the highest.

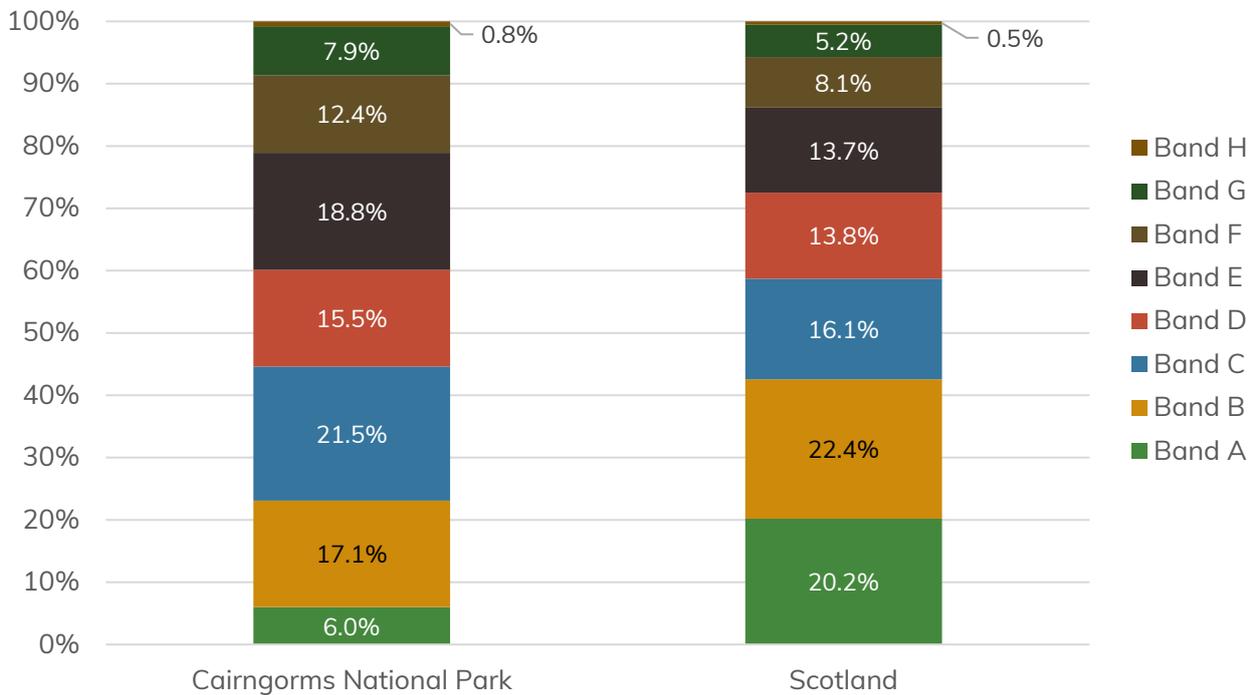


Figure 21 Proportion (%) of each council tax band in the National Park and Scotland as a whole (2023) (nrscotland.gov.uk) (CNPA532).

Figure 21 illustrates that, based on 2023 data, there is a lower proportion of properties within bands A and B, significantly so in the case of band A (6% compared to 20.2% for Scotland as a whole). However, from band C upwards, the National Park has a greater proportion of each band in comparison to Scotland as a whole. In addition, it should be noted that there are spatial variations meaning that this trend is further skewed in certain parts of the National Park.

And finally, the number of rooms that a house has also provides useful data that indicates the types of homes in the National Park. This is the number of habitable rooms (usually bedrooms and living rooms) collated by the National Records of Scotland from the Assessors' Portal.

Figure 22 shows that the National Park has proportionately fewer homes with one to four rooms than Scotland as a whole and more properties with five rooms or more. While the figures between the National Park and Scotland do not appear on the graph to be significantly different, there are 30% fewer one-room homes, 19% fewer two room and 37% fewer three room homes. In addition, there are just 3% fewer four room homes and over double the proportion of homes with nine and ten rooms than that of Scotland as a whole.

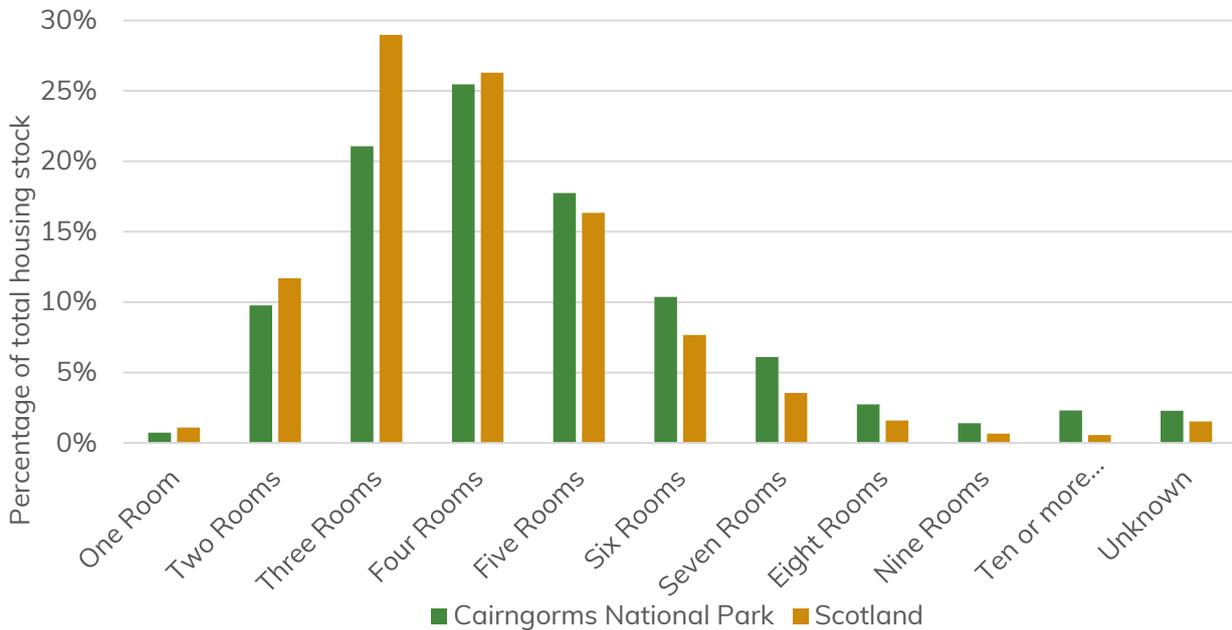


Figure 22 Percentage of housing stock with one to ten or more rooms per house in the National Park and Scotland as a whole (2017) (median number of rooms, statistics.gov.scot) (CNPA533).

In addition to the National Records Scotland data, Scotland’s Census 2022 provides information on the number of bedrooms of occupied households (Figure 23). This shows that the National Park has a smaller proportion of one to two bedroom properties and a higher proportion of three to five or more bedroom properties than Scotland as a whole.

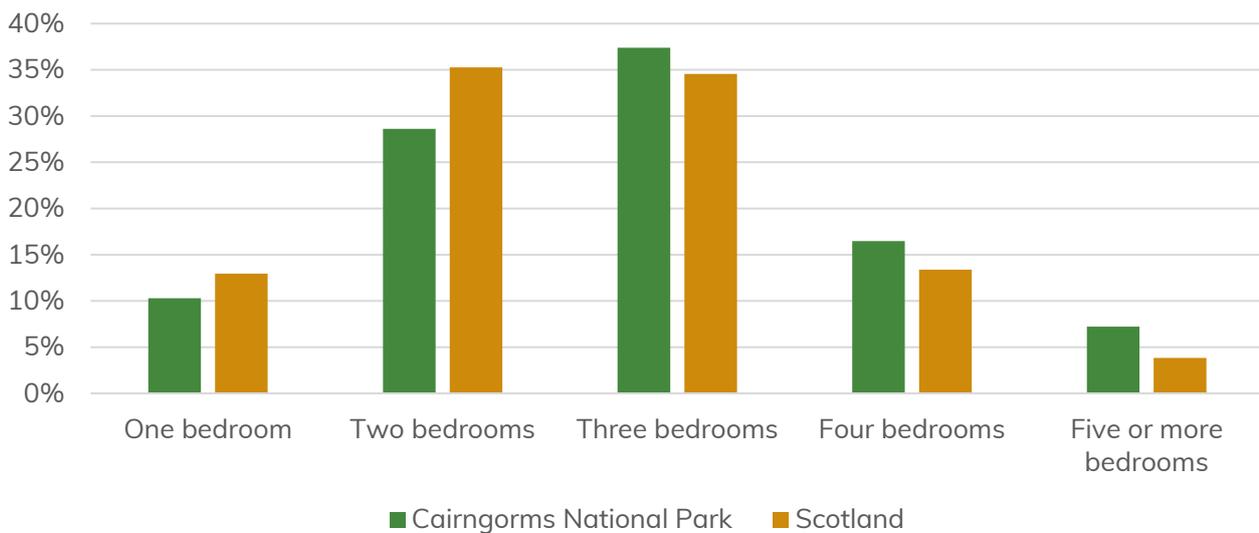


Figure 23 Percentage of households with one to five or more bedrooms per house in the National Park and Scotland as a whole in 2022 (Census Table UV408) (CNPA439).



Numbers of rooms (Figure 22 and Figure 23), council tax bands (Figure 21) and house type data (Figure 19 and Figure 20) all illustrate that the National Park has a greater proportion of larger and ultimately more expensive homes compared to Scotland as a whole. This therefore not only means that housing in the National Park is more expensive, but also that there are fewer smaller homes available. It is also likely to be one of the driving factors for the high rate of house price growth since 2020 as, according to research by the Lloyds Banking Group (CNPA561), nationally the average price for bigger homes grew at nearly twice the rate than smaller properties over the pandemic period.

### Housing tenure

Figure 24 illustrates the different housing tenures that made up the housing stock in the National Park according to the 2022 census. Table 12 sets out the proportions of each tenure type, in each of the constituent authorities. Owner occupation is the dominant tenure, and this is relatively consistent with Scotland as a whole (where owner occupation made up 62% in 2011 and 63% in 2022).

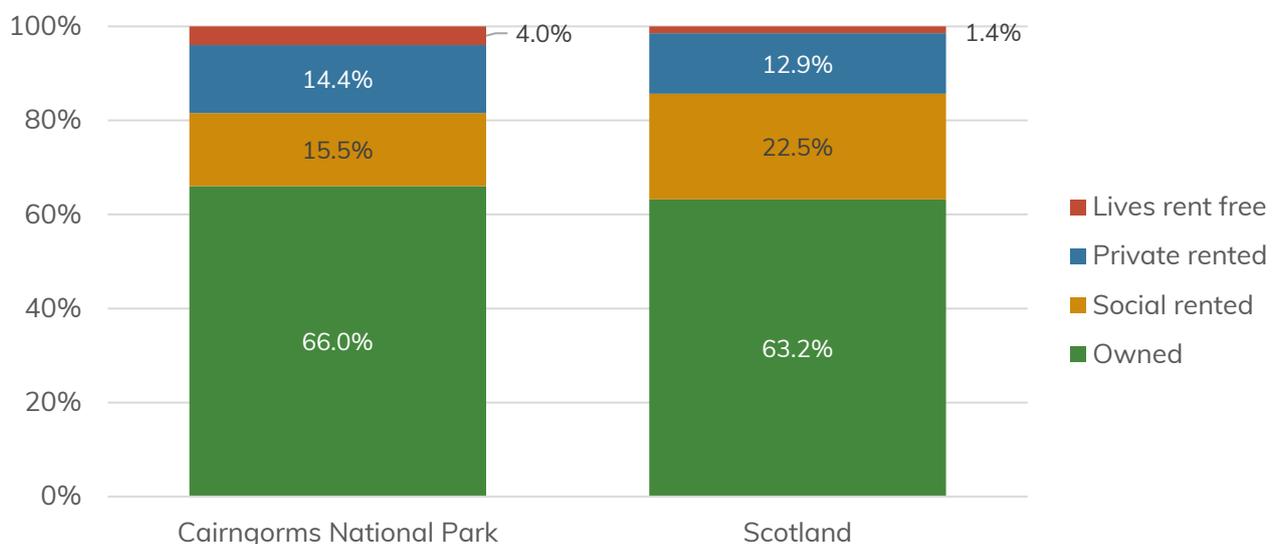


Figure 24 Household tenure of all occupied stock in the National Park and Scotland in 2022 (Census Table UV404) (CNPA439).

The owned category may be broken down into ownership type (Figure 25). This demonstrates that the National Park has a higher rate of outright ownership than the Scottish average. Shared equity (for example the Low cost Initiative for First Time Buyers, known as LIFT) and shared ownership are affordable housing models. In 2022 there were 27 households (0.52%) occupying shared ownership homes and 67 (1.2%)



occupying shared equity homes. While these numbers are low, they exceed the national average, which are 0.4% and 0.95% respectively.

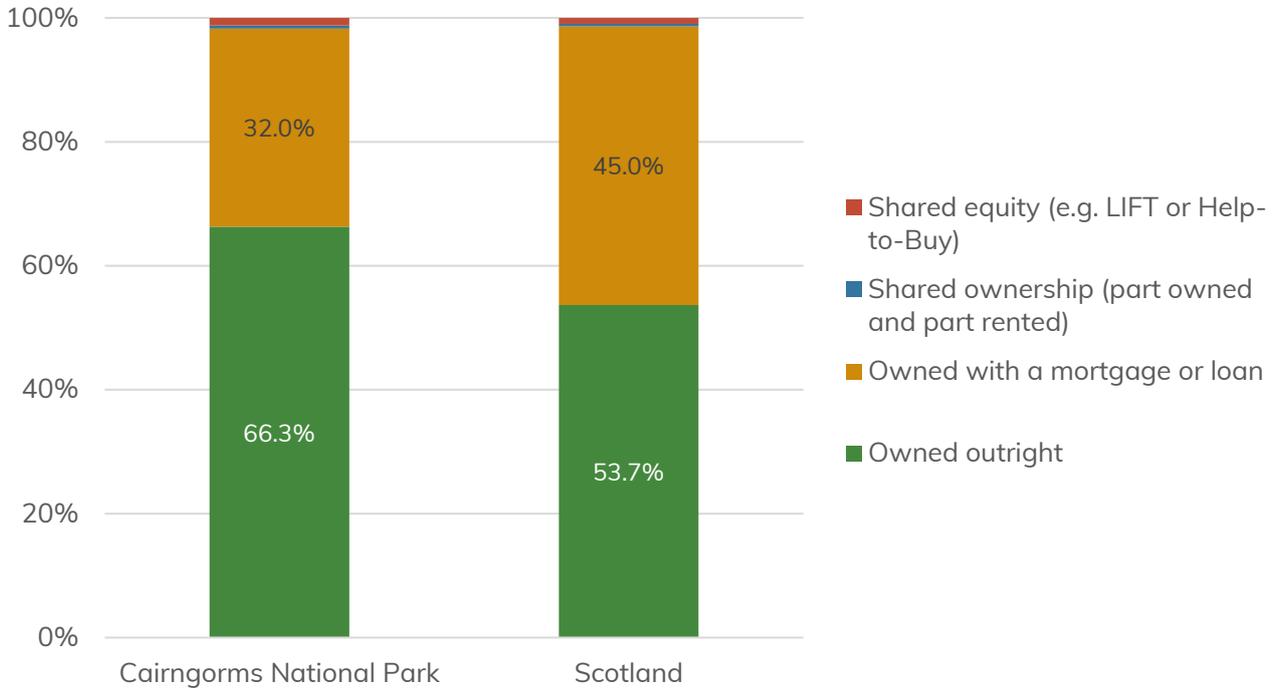


Figure 25 Household tenure of owner occupied stock in the National Park and Scotland in 2022 (Census Table UV404) (CNPA439).

Social rent is the next biggest tenure and accounts for around 16% of households (similar in 2001 and 2011). It remains high despite 1,069 council houses within the National Park being sold through Right to Buy schemes between 1980 and 2005 ([www.statistics.gov.uk](http://www.statistics.gov.uk)). While the Right to Buy scheme has now been abolished in Scotland, social housing stock levels in the National Park remain lower (15.5%) than in Scotland as whole (22.5%).

Living rent free is considerably higher, as a category, in the National Park (4%) in comparison to Scotland as a whole (1.4%). This is likely a reflection of having a high proportion of households renting from an employer representing estate workers and seasonal workers in the tourism sector, where accommodation is often included with the job.

Private rented housing also forms a considerable proportion of housing tenure in the National Park at 14.4%. However, the availability of private rented stock in the Cairngorms National Park is scarce. A search on 31 July 2024, produced no rental properties on 'Right Move', a three bedroom semi detached house (£895 per month) in Grantown-on-Spey (listed on 30 July 2024) and detached three bedroom bungalow



(£700 per month) close to Strathdon on 'Zoopla' (listed on 28 July 2024). and two on Highland Property Services' website (a two bedroom bungalow two miles from Boat-of-Garten for £950 per month and a three bedroom terraced house in Grantown-on-Spey for £925 per month).

On 8 October 2025, private rented stock availability remained just as scarce, with two properties on Right Move (a three bedroom cottage for £1,300 per month and a two bedroom cottage for £1,000 – both in Bridge of Tilt in Perthshire). No properties were advertised within the National Park on Zoopla and none on the Highland Property Services website.

Table 12 Housing tenure of all stock in the Cairngorms National Park, in each constituent local authority area, and in Scotland as a whole (Census 2022, Table UV404) (CNPA439).

Geographic area	Owned	Social rented	Private rented	Living rent free
Cairngorms National Park	60.0%	15.6%	14.4%	4.0%
Aberdeenshire	73.9%	15.4%	9.1%	1.6%
Angus	67.1%	19.3%	11.8%	1.8%
Highland	67.8%	19.5%	10.7%	2.1%
Moray	67.0%	19.2%	11.9%	1.9%
Perth & Kinross	67.8%	16.4%	13.7%	2.1%
Scotland	63.2%	22.5%	12.9%	1.4%

It is not possible to obtain an accurate picture of the amount and type of social housing stock in the National Park as well as the demand for it, due to housing market areas within many of the local authorities not aligning with the National Park. However, this information is available for Badenoch and Strathspey (as set out in the Highland Council's Housing Need and Demand Assessment 2020) which closely aligns with the boundaries of the National Park in the Highland Council area.

Table 13, below, shows there are a total of 895 social rented properties within Badenoch and Strathspey and the biggest proportion of these are houses (comprising bungalows and houses), which form over 66% of the total social rented housing stock.



Table 13 Social rented stock by type in Badenoch and Strathspey (The Highland Council, Housing Need and Demand Assessment, 2022) (CNPA126).

	Bedsit	Bungalow	Ground floor flat	House	Sheltered	Upper flat	Total
Number	2	220	153	377	16	127	895
Proportion	0.2%	24.6%	17.1%	42.1%	1.8%	14.2%	100%

Table 14, below, shows house sizes across the social rented sector in Badenoch and Strathspey. It is notable that over 50% of properties are two bed. However, when comparing this to demand (Table 15), only 17% is for two bed properties. 63% are seeking a one bed property (only 27% of the stock). This highlights the imbalances and difficulties in meeting housing need, as well as the demand for one bed properties. It also supports the need for the Proposed Plan to contain mechanisms to deliver a higher proportion of smaller homes.

Table 14 Social rented stock by size in Badenoch and Strathspey (The Highland Council, Housing Needs and Demand Assessment, 2022) (CNPA126).

	one bed	two bed	three bed	four+ bed	Total
Number	242	456	173	24	895
Proportion	27%	51%	19%	3%	100%

Table 15 Housing demand by property size in Badenoch and Strathspey (Source: The Highland Council, Housing Needs and Demand Assessment, 2022) (CNPA126).

	one bed	two bed	three bed	Four+ bed	Total
Number	439	116	101	41	697
Proportion	63%	17%	14%	6%	100%

See from page 90 for a detailed analysis of housing need and demand, including affordable housing.

### Implications of the housing stock characteristics

There is an imbalance in the housing stock, with a greater proportion of large, detached market properties than in Scotland as a whole and insufficient one bedroom social rental properties. The Cairngorms National Park Local Development Plan 2021 (CNPA016) already seeks to address the imbalance through Policy 1.4: which requires residential developments to provide a mix of dwelling types and sizes to help secure a balanced housing stock, with an emphasis on smaller dwellings. The Proposed Plan will need to take a similar approach.



## Second homes, empty homes and vacant dwellings

Like many rural areas, ineffective stock, which includes second homes and vacant homes, is likely to be compounding the issues of affordability in the National Park, particularly following the Covid 19 pandemic. Evidence published by the Royal Town Planning Institute in 2022 (CNPA554) highlights that rural areas experienced high annual price growth between 2020 and 2021 in both 'near countryside' areas influenced by larger centres and 'less accessible countryside', such as National Parks.

It suggests that in these important rural amenity areas, the changes in the market are rooted in three lifestyle changes. Firstly, increased demand for second homes; secondly the conversion of existing second homes to first use homes; and thirdly permanent lifestyle relocation. House prices also increased due to the demand for holiday lets responding to the growing staycation market and greater demand for family homes in rural amenity areas. Growth rates of around 20% were seen in English coastal areas, Welsh rural authorities and Argyll and Bute (encompassing many island communities).

The paper comments that rural authorities will need to rethink patterns of housing supply – whether they continue with plans to expand key service centres and restrict growth in smaller settlements or 'smear growth' more evenly across settlement hierarchies enabling more villages to expand.

The paper also notes that the impacts of the pandemic are still uncertain, and it is not known whether counter urbanism will continue, increasing the pressure of rural areas, or whether 'pandemic buyers' will return to urban or suburban lives. In either case, pressure on the stock of rural homes, especially in amenity and coastal areas is likely to remain strong, with a key challenge for local authorities being how to protect houses for local occupation and expand the stock of affordable homes.

Figure 26 shows that there is a very high proportion of second homes (10.5% of all dwellings) in the National Park, when compared to its constituent local authorities and to Scotland as a whole. The figure is also significantly higher than the figure for all Scottish remote rural areas (rural / urban classification), which is 6.5%<sup>13</sup>. Together with the fact that 6% of homes are vacant<sup>14</sup>, over 16% of all housing stock in the Cairngorms National Park is ineffective (based on 2023 data).

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<sup>13</sup> Rural and Islands Housing: Action Plan (2023)( CNPA544).

<sup>14</sup> This includes dwellings exempt from paying council tax because they are unoccupied and dwellings which are recorded on council tax systems as being long term empty properties.



By contrast, the proportion of ineffective dwellings in the National Park’s constituent local authorities is considerably lower and in Scotland as a whole, where second homes account for just 0.9%, with a further 3.3% being vacant (totalling 4.2%).

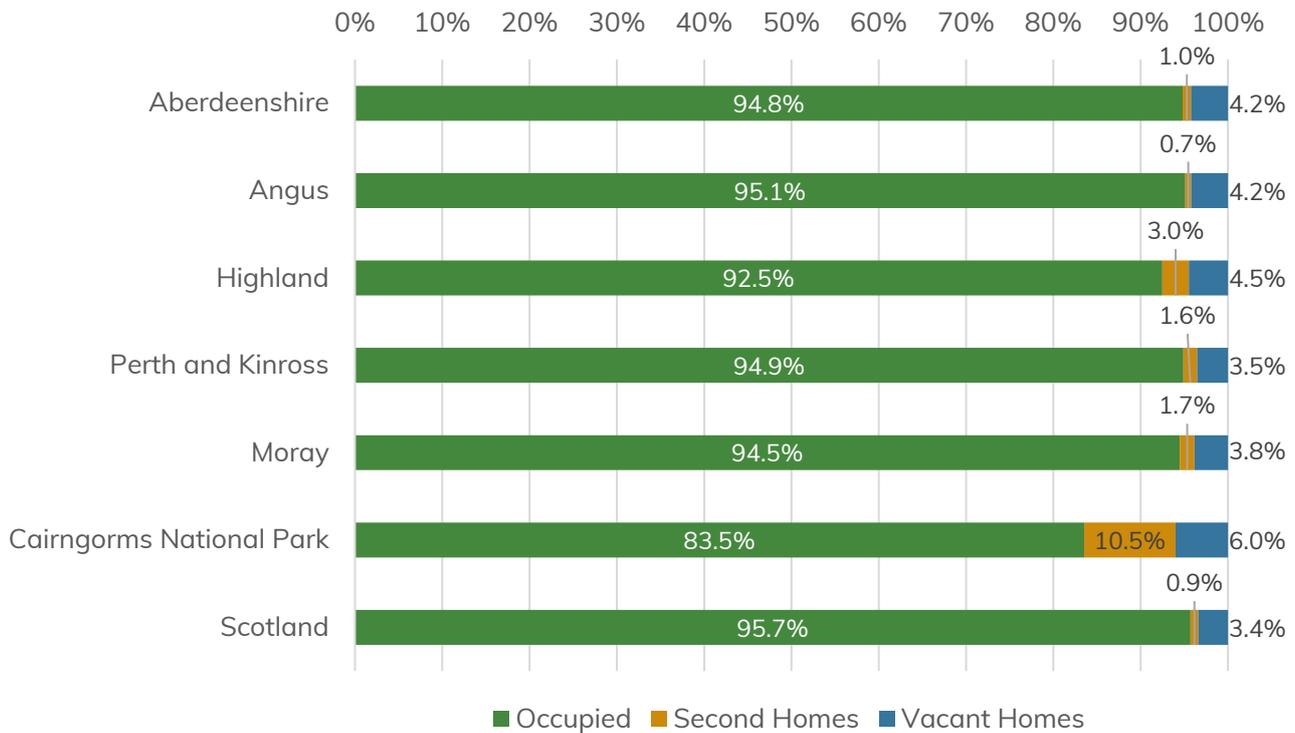


Figure 26 Percentages of effective and ineffective housing stock in the National Park, in Scotland, and in each constituent local authority area, based on 2023 data (statistics.gov.scot) (CNPA532).

The historical data set out below is informative. While between 2008 and 2023 the number of dwellings in the National Park grew from 9,722 to 10,542, an increase of around 10.5%, the number of occupied dwellings only grew by 8.5%, from 8,114 to 8,805. This is due to an increase in vacant dwellings, rather than second homes. As set out in Table 16 and Figure 27, between 2008 and 2023, the number of vacant dwellings increased from 359 to 632, while the number of second homes fell, from 1,245 to 1,105.

Table 16 Household estimates of the total dwelling stock and the number of occupied homes and ineffective stock (second and vacant) homes) in the Cairngorms National Park 2008-2023 (statistics.gov.uk) (CNPA532).

Category	2008	2009	2010	2011	2012	2013	2014	2015
Total dwellings	9,722	9,789	9,888	9,932	9,985	10,055	10,094	10,188
Occupied	8,114	8,142	8,207	8,242	8,283	8,362	8,510	8,486
Second homes	1,245	1,270	1,266	1,263	1,267	1,241	1,192	1,210
Vacant	359	377	409	423	435	451	393	491



Category	2008	2009	2010	2011	2012	2013	2014	2015
Ineffective stock	1,604	1,647	1,675	1,686	1,702	1,692	1,585	1,701

Category	2016	2017	2018	2019	2020	2021	2022	2023
Total dwellings	10,117	10,196	10,255	10,247	10,673	10,283	10,358	10,542
Occupied	8,455	8,567	8,654	8,621	8,642	8,643	8,683	8,805
Second homes	1,187	1,205	1,176	1,158	1,138	1,118	1,100	1,105
Vacant	474	422	421	469	493	522	575	632
Ineffective stock	1,661	1,627	1,597	1,627	1,631	1,640	1,675	1,737

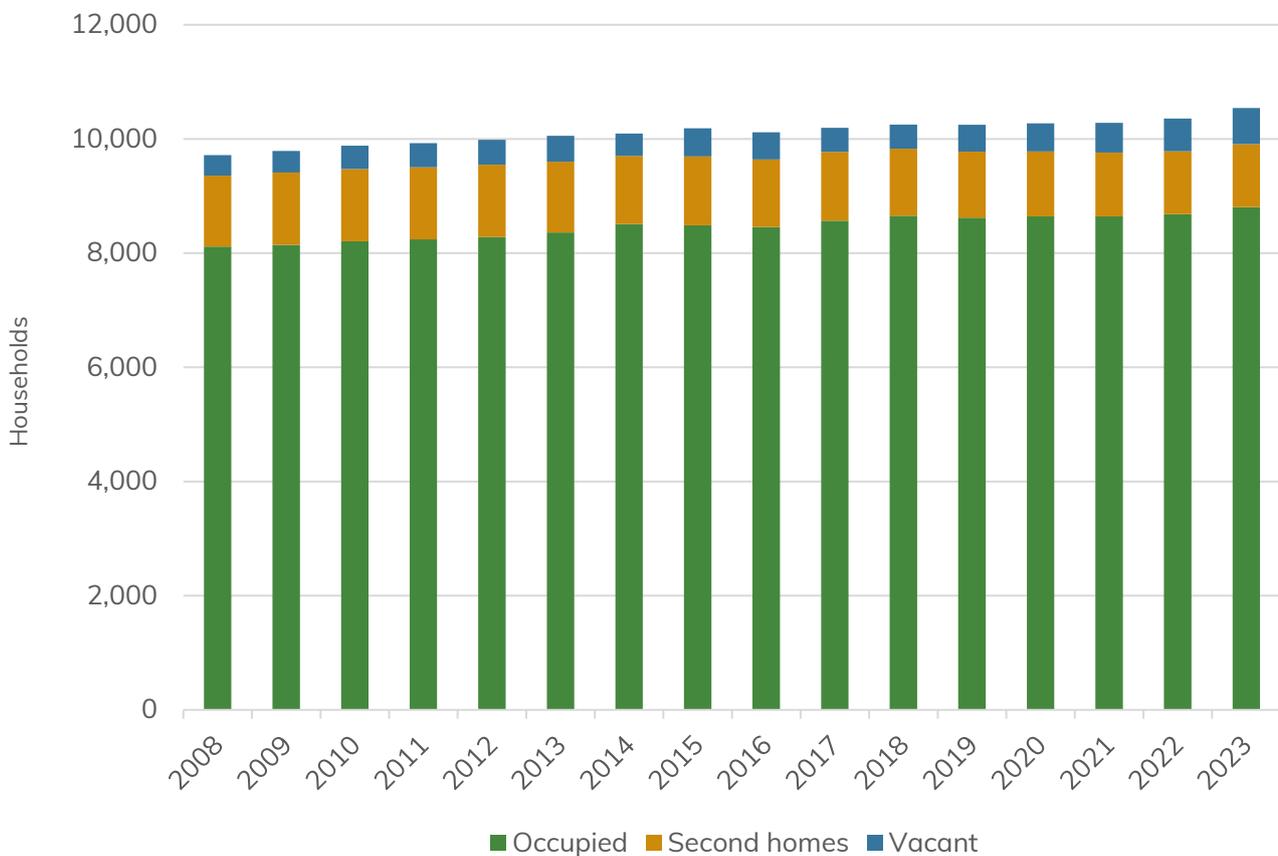


Figure 27 Household estimates of total dwelling stock in the Cairngorms National Park coloured to show the proportion of effective (occupied) and ineffective (second homes and vacant dwellings) housing stock for each year from 2008 to 2023 (statistics.gov.uk) (CNPA532).



### Second homes 2023

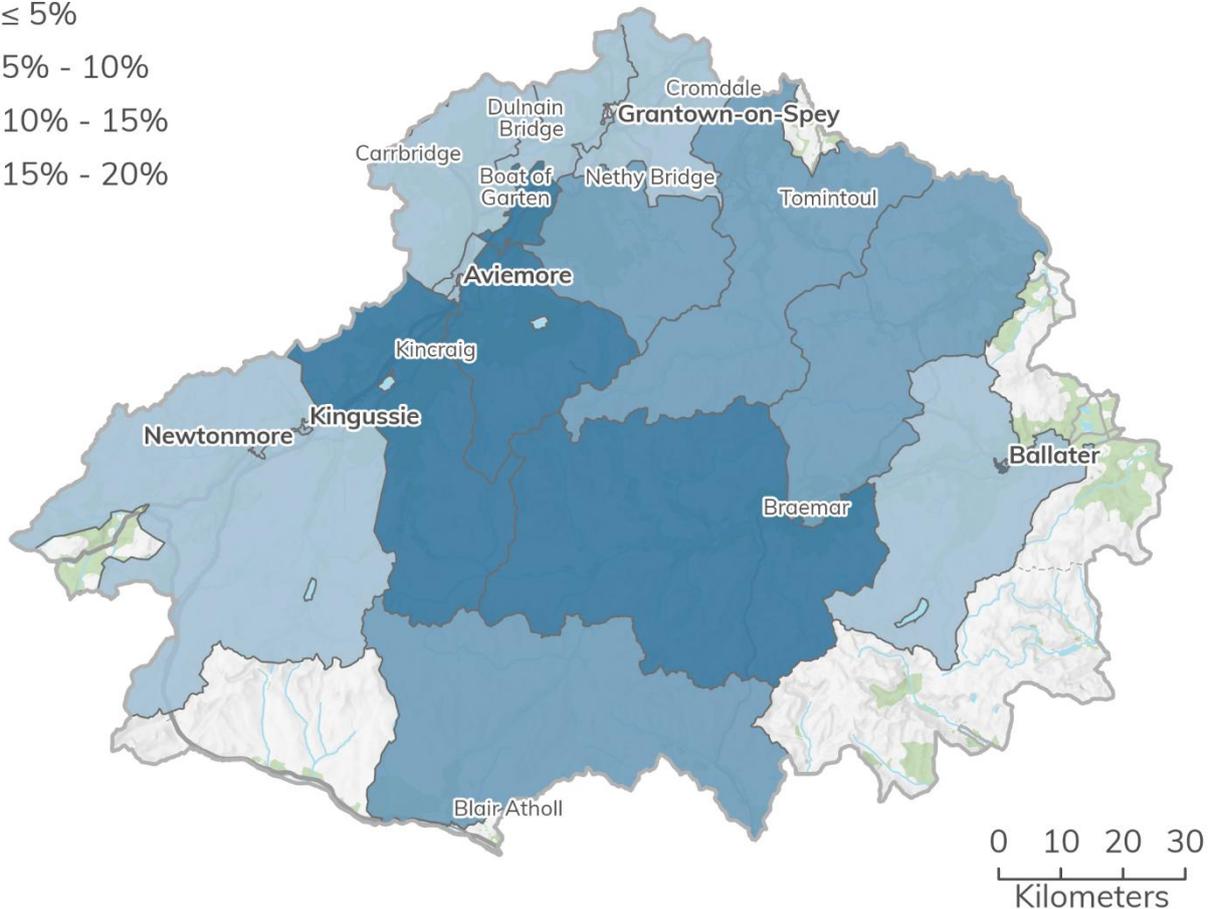
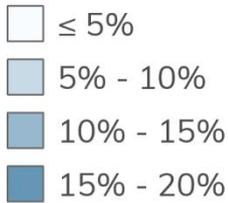


Figure 28 Proportion of second homes by 2011 data zone in the Cairngorms National Park in 2023. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © National Records Scotland, 2026 (CNPA533).

The distribution of second homes varies considerably throughout the National Park. Evidence for individual villages is not available, however the data zone data mapped in Figure 28, indicates that, in 2023, the highest levels occurred around parts of Aviemore and Glenmore (18%), parts of Ballater (17%), Boat of Garten (16%), Braemar (19%) and Kineraig (19%). These areas also correspond with the areas with the highest levels of ineffective stock (Figure 29).



Ineffective stock 2023

- ≤ 5%
- 5% - 10%
- 10% - 15%
- 15% - 20%
- 20% - 25%
- 25% - 30%

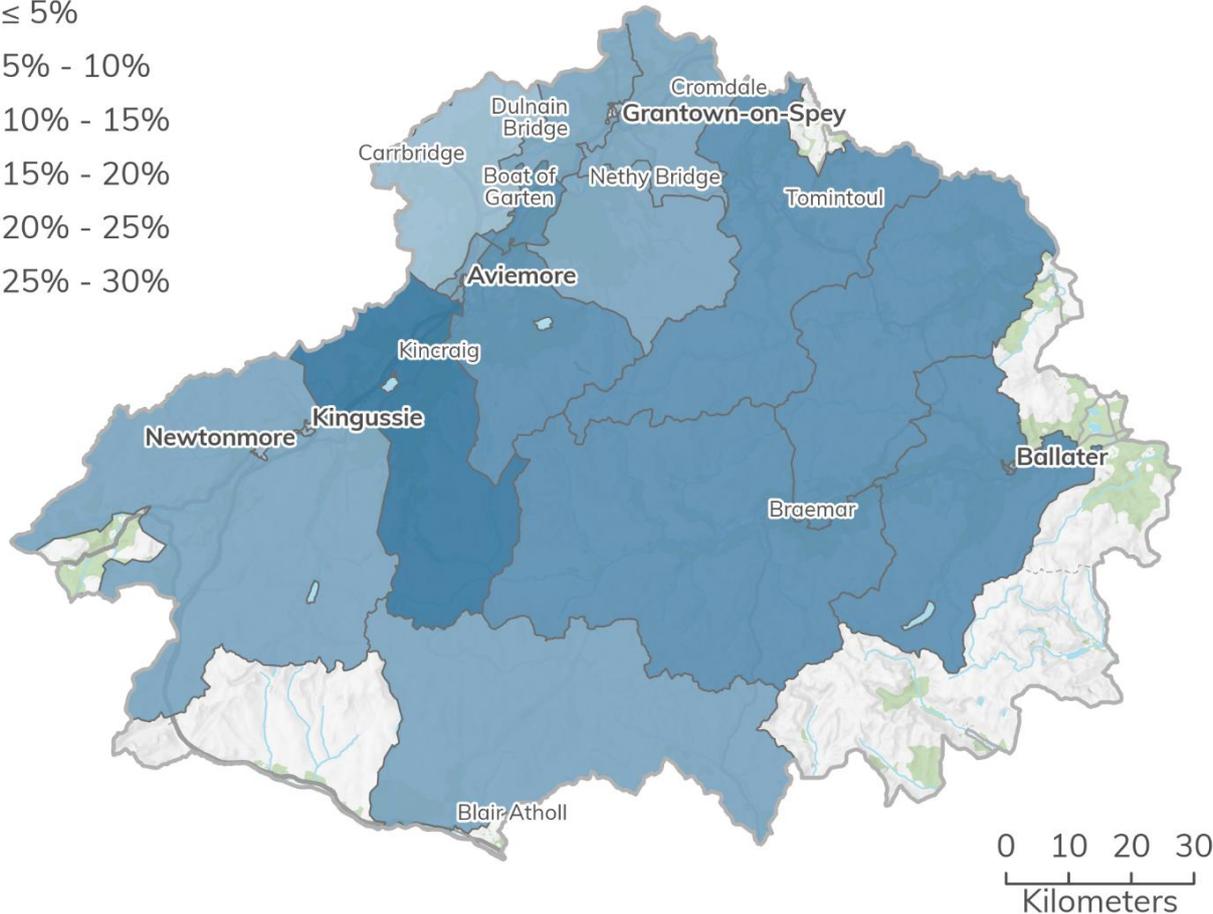


Figure 29 Proportion of ineffective stock by 2011 data zone in the Cairngorms National Park in 2023. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © National Records Scotland, 2026 (CNPA533).

### Implications of second homes, empty homes and vacant dwellings

The Proposed Plan will not be able to directly control the use of market residential properties as second homes, as planning permission is not required for changes to their use as primary or secondary residences. Second homes also play an important role for the National Park’s visitor economy.

The Proposed Plan will need to take account of their significance in finalising a local housing land requirement and this has been taken into account in the indicative housing land requirement proposed by this schedule (see page 143). In accordance with the National Park Partnership Plan (CNPA010), it should have a policy framework that seeks to stabilise the numbers of second homes for example by delivering higher rates of affordable homes, which will have occupancy conditions tying them to be used as primary residences.



## Short term lets

In addition to second homes, properties are also used as short term holiday lets. Since October 2022, all hosts of short term let properties in Scotland must hold a short term let licence and be registered. Each local authority must publish a public register. There are four types of licence. Home sharing and home letting concern the use of the host or operator's only or principal home whereas secondary letting makes use of a separate premises.

The public registers indicate that there are 1,160 registered short term holiday let properties in the Cairngorms. 811 (70%) of these are in Highland, 236 in Aberdeenshire, 68 in Perth and Kinross, 41 in Moray and four in Angus. This data is shown graphically in Figure 30. It is shown spatially in Figure 31. This shows a very high concentration in Aviemore as well as high numbers across Strathspey and in Ballater.

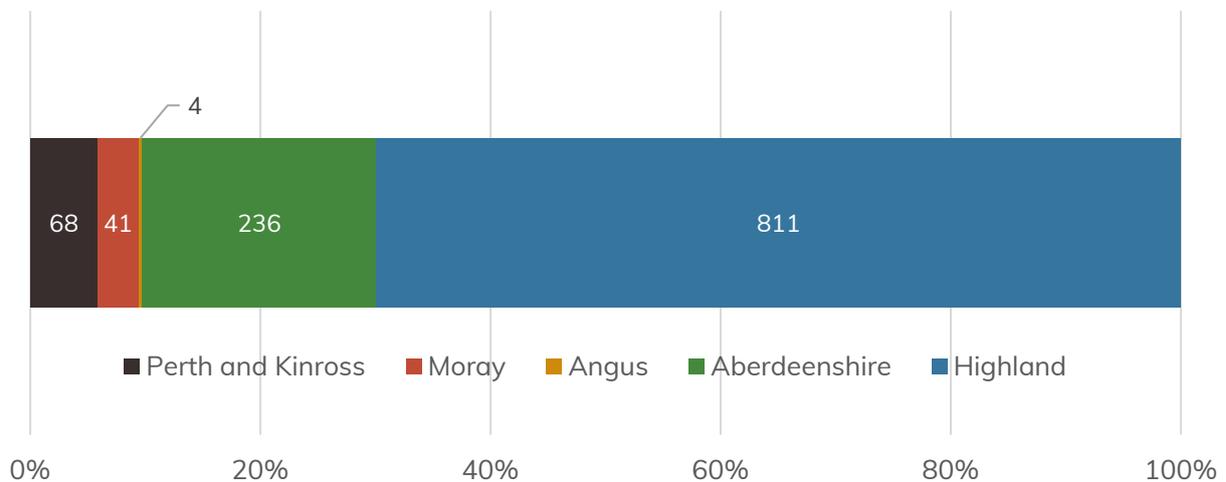


Figure 30 Number of publicly registered short term holiday lets in the Cairngorms National Park, by local authority (licensing authority public registers, September 2025) (CNPA429, CNPA576, CNPA579, CNPA585, CNPA591).

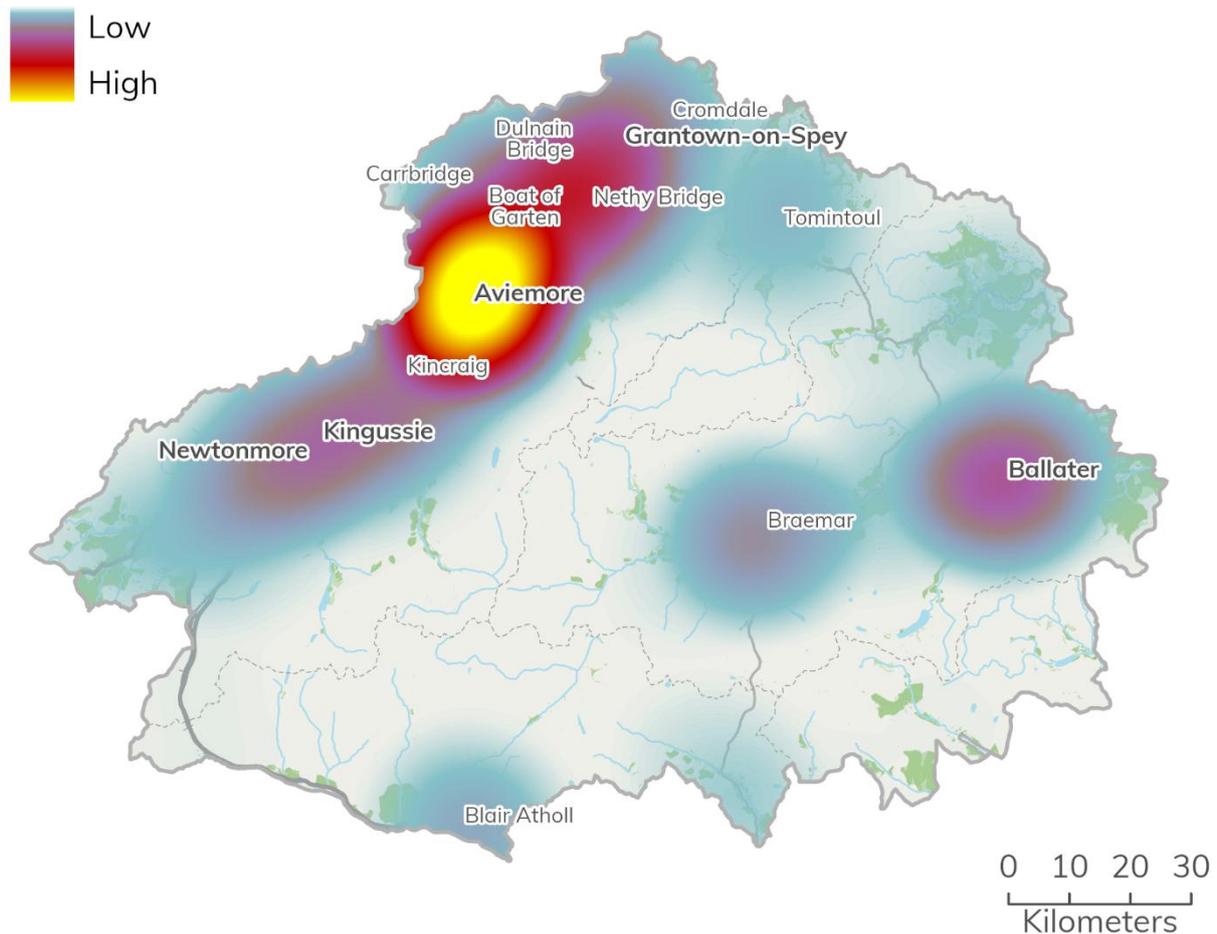


Figure 31 Heat map showing the distribution of short term let licenses across the Cairngorms National Park up to September 2025. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © National Records Scotland, 2026 (licensing authority public registers) (CNPA429, CNPA576, CNPA579, CNPA585, CNPA591).

88.9% of short term holiday lets in the Cairngorms National Park are registered as secondary lettings. This means that they are not primary residences and are not part of the housing stock. In total, there are 1,031 properties registered as secondary lettings. Figure 32 shows that the proportions are similar for each constituent authority.

This data indicates that the number of short term lets in the Cairngorms National Park, which are not also primary dwellings, is roughly equivalent to 9%<sup>15</sup> of the total housing stock. Note that these properties are not part of the housing stock. However, this indicates that in addition to 10.5% of the housing stock being second homes, there are

<sup>15</sup> It is not clear from the public register data whether the short term let properties are purpose built for this use or are former dwellings, however only 102 (around 9%) are recorded as being 'unconventional dwellings', which are less likely to be suitable for residential use.



roughly an equivalent number of properties outwith the housing stock used for holiday purposes.

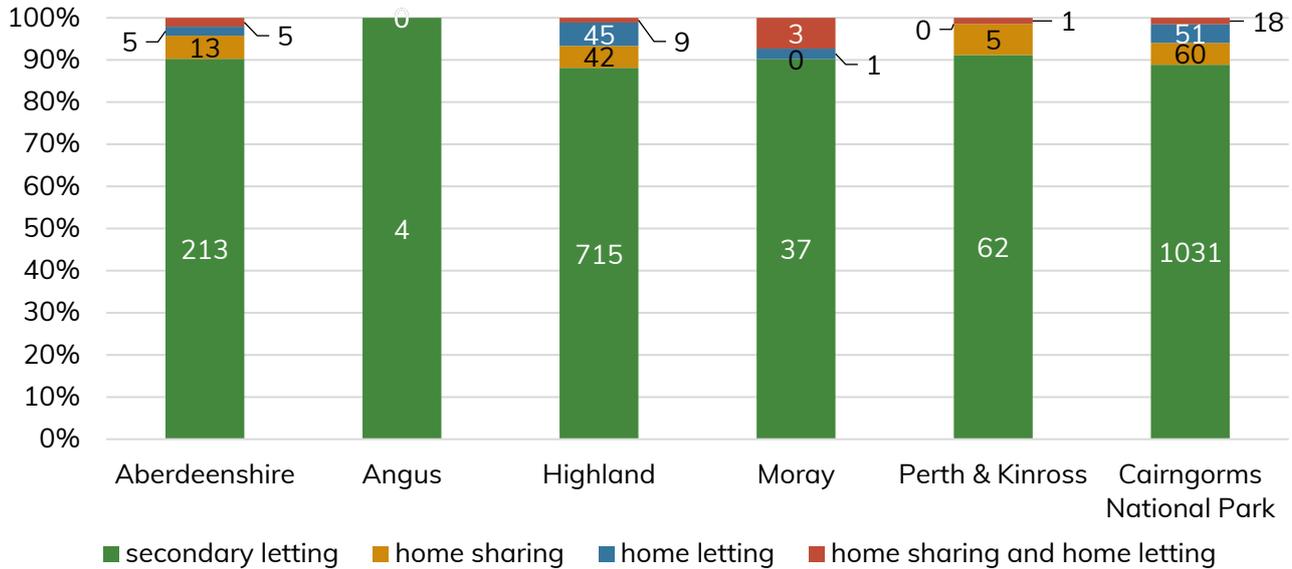


Figure 32 Proportion of secondary and principal home short term holiday lettings for the Cairngorms National Park and for each licensing authority (licensing authority public registers, September 2025) (CNPA429, CNPA576, CNPA579, CNPA585, CNPA591).

62% of registered short term holiday lets are detached dwellings and a further 17% semi detached. Figure 33 shows that these proportions are similar for each constituent authority.

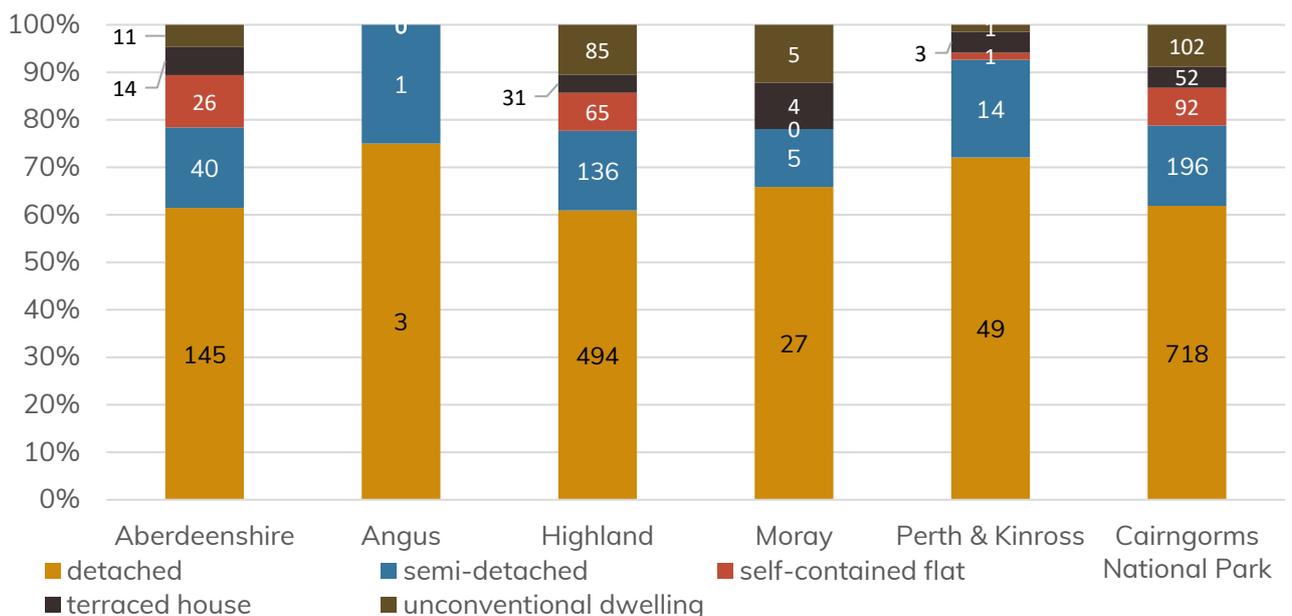




Figure 33 Number and proportion of short term holiday lets in each dwelling type for each licensing authority (licensing authority public registers, September 2025) (CNPA429, CNPA576, CNPA579, CNPA585, CNPA591).

Further information on the distribution of short term lets is available from the Scottish Assessors Association (CNPA1366) (Figure 34). This data is derived from business rate valuations rather than the local authority licencing registers. The two data sets therefore do not match perfectly; however, the map provides a good indication of where short term lets are concentrated within the National Park.

Properties paying non-domestic rates

- 1
- 2 - 5
- 6 - 10
- 11 - 15
- 16 - 30

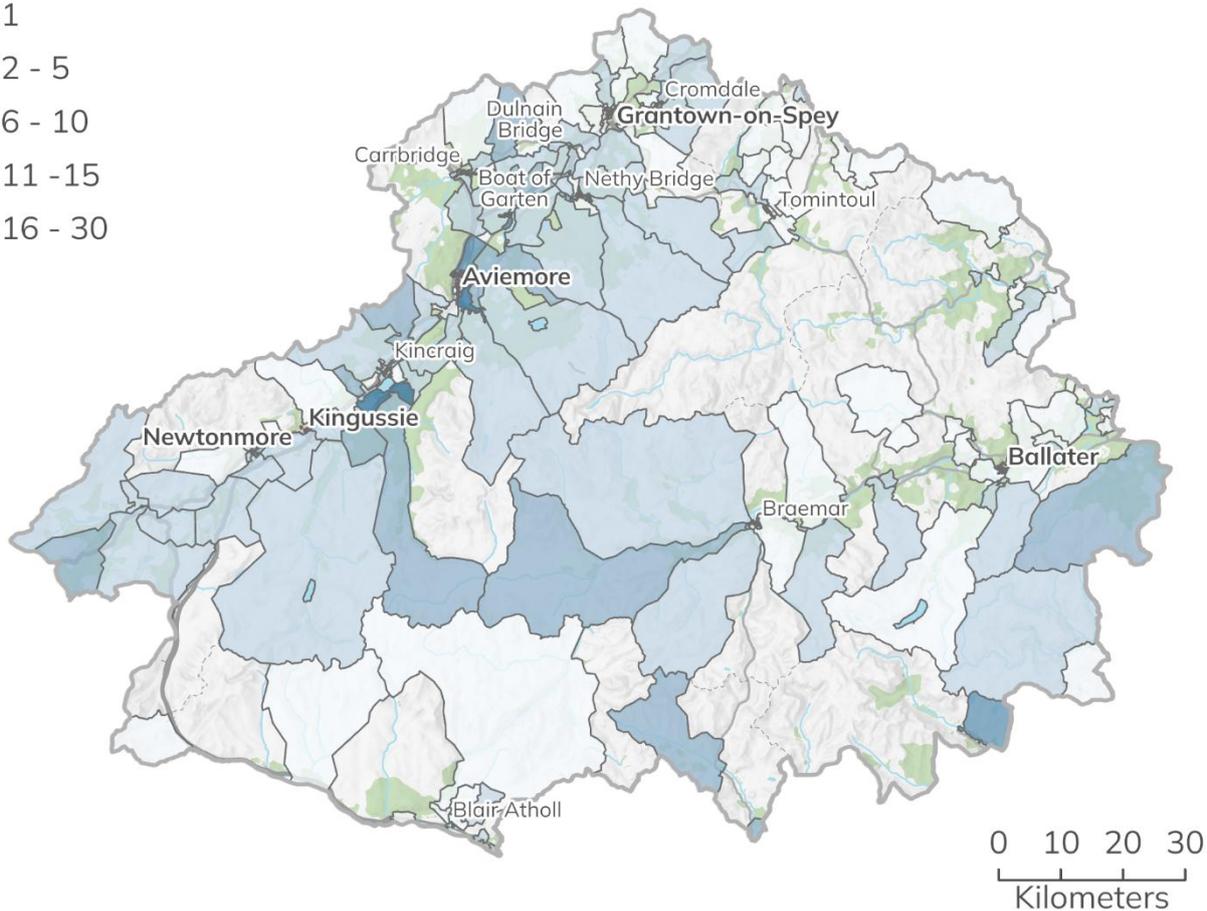


Figure 34 Proportion of properties paying non domestic rates in the Cairngorms National Park by postcode area in 2023. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © Scottish Assessors Association, 2026 (CNPA1366).

The Cairngorms Business Barometer – Quarter 1 2024, provides some insight into short term lets from the business community with a lack of housing for the local population due to a high number of holiday homes noted.



In addition to requiring short term lets to be licenced, the legislation (Section 26B of the Town & Control Planning (Scotland) Act 1997 as amended (CNPA005)) also enables local authorities to designate a 'Short Term Let Control Area' across all or part of its region to alleviate pressures in some areas and ensure homes can be utilised to meet local housing needs.

On 4 March 2024, The Highland Council designated a short term let control area for the Badenoch and Strathspey area (Ward 20), the majority of which lies within the National Park. The Highland Council's reason for doing so was that the number of short term let properties in Badenoch and Strathspey 'is unduly restricting house supply for full time residents and increasing local house prices, all to the detriment of our local communities' (The Highland Council, Badenoch and Strathspey Short term Let Control Area Statement of Reasons) (CNPA1428).

This means that planning permission is required to change the use of a dwelling to a short term let in Badenoch and Strathspey. Planning applications for short term lets are assessed against relevant planning policies to determine whether they are acceptable.

Highland Council has introduced a 'non-statutory short term lets within a control area planning policy' (CNPA433). It supports the use of an existing dwellinghouse as a short term let where it falls into one of the following categories:

1. It is a long term empty dwellinghouse that will be brought back into active use. Supporting evidence will be required to be submitted to demonstrate this.
2. The dwellinghouse is located above a commercial unit within a city, town or village centre.
3. The dwellinghouse has no fewer than four bedrooms, as it existed at the date of the establishment of the Control Area or, if constructed after the designation of the Control Area, as originally built.

A review of planning applications for change of use to short term lets determined in Badenoch and Strathspey by The Highland Council since the control area was established indicates that 165 applications have been processed. 56 (34%) were granted planning permission, 28 (17%) refused planning permission and 81 (49%) were closed or withdrawn without a decision.

Those granted planning permission met the non-statutory planning policy, in that they were for properties with four or more bedrooms. Those refused had three bedrooms or less.



The reasons why planning applications were withdrawn by applicants is not known and the information submitted with the applications is often limited, but many of the applications were for change of use of dwellings with less than four bedrooms. It is likely that these were withdrawn because the applicants were advised that permission would be refused.

This means that, in total, up to 109 dwellings in Badenoch and Strathspey that would otherwise have been lost from the housing stock between April 2024 and October 2025 may have been retained in residential use.

This spatial distribution of these planning applications is shown in Figure 35.

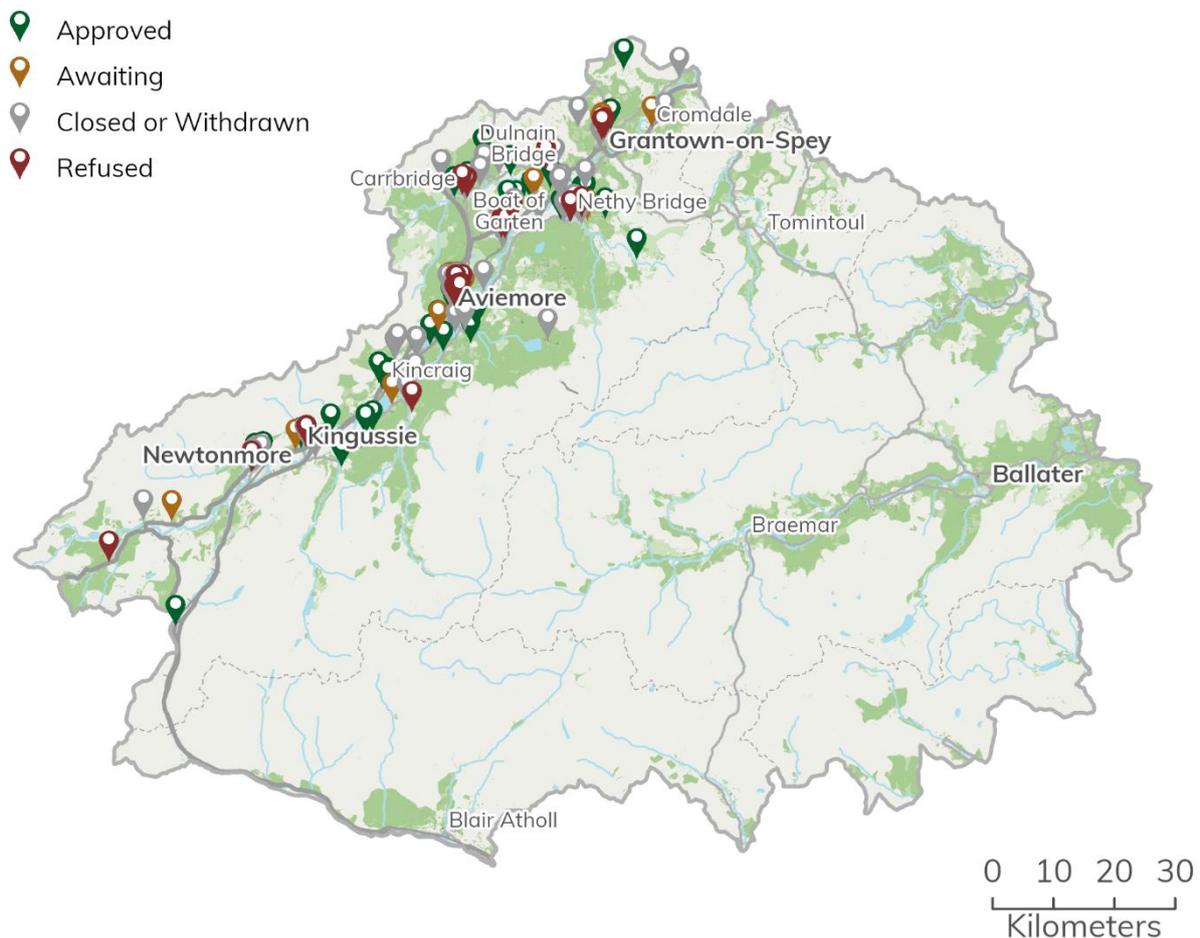


Figure 35 Map of the Cairngorms National Park showing the location of planning applications determined or withdrawn within the short term let control area and in which way they were determined up until September 2025. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810 (The Highland Council) (CNPA1367).

In May 2025, Perth and Kinross Council voted to start the process of creating a short term let control area in Highland Perthshire and North Eastern Perthshire. The statutory



public consultation takes place between 28 October 2025 and 22 December 2025, with the full process expected to take at least twelve months. Perth and Kinross Council introduced non-statutory planning guidance in relation to the change of use of residential property to short term let in November 2023. The guidance advises that, where planning permission is required, proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in (i) an unacceptable impact on local amenity or the character of a neighbourhood or area or (ii) the loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits. Six considerations under which proposals will be tested against the guidance are listed.

### **Implications of short term lets**

The designation of the Badenoch and Strathspey short term control area by The Highland Council has helped to reduce the number of residential properties lost to the holiday accommodation market.

The Proposed Plan will need to recognise the designation of the Badenoch and Strathspey short term let control area and potential future designations. A policy should be included similar to the non-statutory policy (CNPA433) currently implemented by The Highland Council. The Park Authority will need to engage with the local authorities covering the National Park on the scope of the policy.

Nevertheless, the Proposed Plan will need to take account of the effect of short term lets on the housing market in finalising a local housing land requirement and this has been taken into account in the indicative housing land requirement proposed by this schedule (see page 143). In addition, delivering higher rates of affordable homes, which increase the number of properties with occupancy conditions tying them to be used as primary residences.

### **Housing completions**

#### **Overall**

The average number of houses built per year in the Cairngorms National Park between 2000 and 2024 was 84 – giving an average 10 year period figure of 840 dwellings.

The actual annual completions figure has fluctuated widely. Figure 36 illustrates completion levels within each local authority area of the National Park as well as the total figure for the National Park for each year from 2000 to 2024. It shows that the number of dwellings built each year increased from 75 in 2000 to 218 in 2006. However,



the number fell sharply during the 2007 – 2008 financial crisis, which resulted in an average annual completion rate of around 70 new dwellings per year between 2007 and 2021. The Covid 19 pandemic caused a greater dip in 2021, with a rebound in 2022 to 131 housing completions, and this continued in 2023, with 136 housing completions. In 2024, the number of completions was 111.

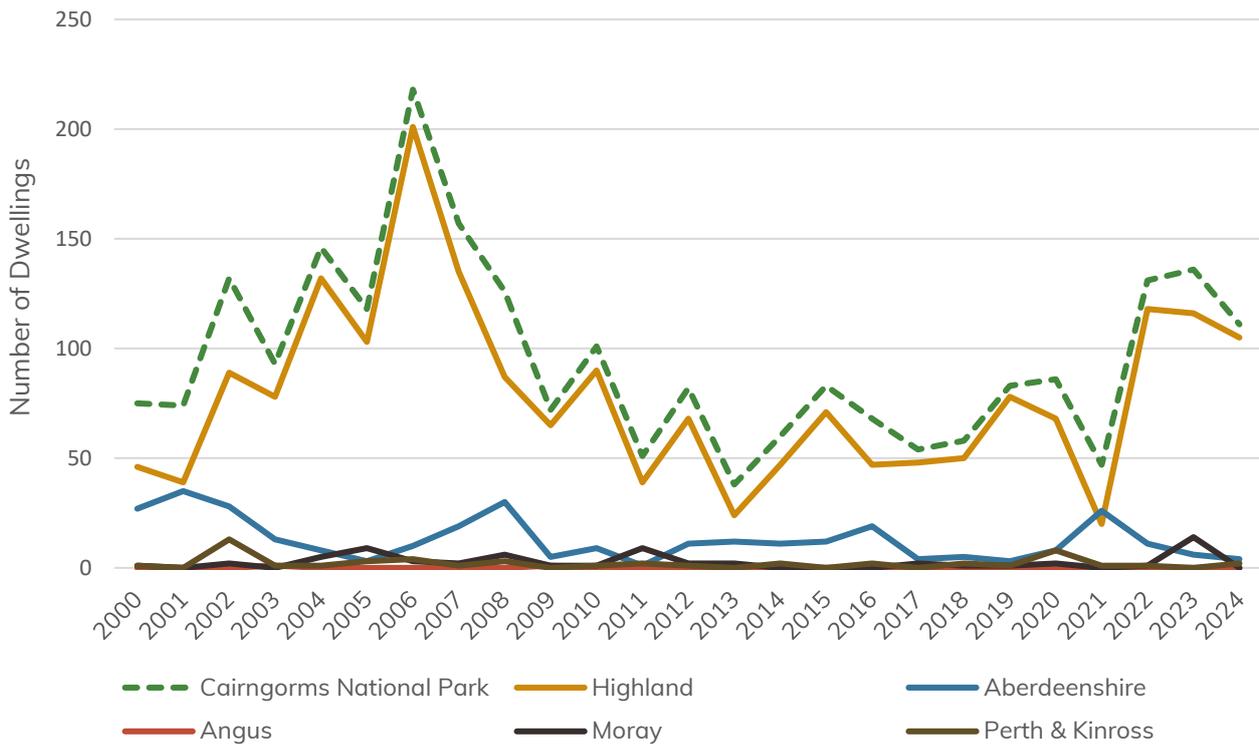


Figure 36 Housing completions in the Cairngorms National Park and for each constituent local authority area between 2000 and 2023 (constituent authorities).

Most new houses are built in Badenoch and Strathspey, the part of the Cairngorms National Park within The Highland Council. In the past six years (2019 – 2024), this figure was 85% (Table 17).

Table 17 Housing Completions in Cairngorms National Park by constituent authority 2019 – 2024 (constituent authorities).

Year	Cairngorms National Park	The Highland Council	Aberdeenshire Council	Angus Council	Moray Council	Perth and Kinross Council
2019	83	78	3	0	1	1
2020	86	68	8	0	2	8
2021	47	20	26	0	0	1
2022	131	118	11	0	1	1



Year	Cairngorms National Park	The Highland Council	Aberdeenshire Council	Angus Council	Moray Council	Perth and Kinross Council
2023	136	116	6	0	14	0
2024	111	105	4	0	0	2
<b>Totals</b>	<b>594</b>	<b>505</b> <b>(85%)</b>	<b>58</b> <b>(10%)</b>	<b>0</b> <b>(0%)</b>	<b>18</b> <b>(3%)</b>	<b>13</b> <b>(2%)</b>

## Windfall sites

For The Highland Council part of the Cairngorms National Park, the proportion of housing completions on small and large windfall sites is shown in Table 18. 56% of housing completions were on windfall sites in 2019 and 54% in 2020. In 2021, the Covid 19 pandemic meant that 100% were completed on small windfall sites.

The Cairngorms National Park Local Development Plan 2021 (CNPA016) appears to have, over time significantly reduced the reliance on windfall sites, with 57% in 2022, 20% in 2023 and 11% in 2024.

Small windfall sites (those developments of less than four dwellings) however, remain an important element of housing delivery, averaging 20% since 2019 (if 2021 is excluded from the average).

Table 18 Proportion of housing completions, in Badenoch and Strathspey in 2019 – 2024, on small and large windfall sites and on sites allocated for housing in the Cairngorms Local Development Plan (CNPA016) (Highland Council area).

Year	Small windfall sites	Large windfall sites	Total – windfall sites	Local development plan housing allocations
2019	31%	26%	56%	44%
2020	22%	32%	54%	46%
2021	100%	0%	100%	0%
2022	22%	25%	57%	53%
2023	15%	5%	20%	80%
2024	11%	0%	11%	89%

In the rest of the National Park, the role of windfall sites is harder to analyse on a yearly basis, because housing completions are low. Table 19 summarises the windfall contribution for the period from 2019 to 2024.



Table 19 Proportion of housing completions between 2019 and 2024, in Aberdeenshire, Moray and Perth and Kinross Councils, on small and large windfall sites and on sites allocated for housing in the Cairngorms Local Development Plan (CNPA016) (Aberdeenshire, Angus and Moray Councils).

Local authority	Small windfall sites	Large windfall sites	Total – windfall sites	Local development plan housing allocations
Aberdeenshire Council	59%	0%	59%	41%
Moray Council	33%	67%	100%	0%
Perth and Kinross Council	33%	67%	100%	0%

In the Aberdeenshire Council part of the Cairngorms National Park, one allocated site has been developed between 2019 and 2024. This is the former school site in Braemar (allocation C1), where 24 affordable dwellings were completed between 2020 and 2022. The rest of the dwellings completed in the Aberdeenshire Council area are on small windfall sites – delivering 59% of overall completions.

In the Moray Council part of the Cairngorms National Park, 100% of housing has been built on windfall sites since 2019. A large windfall site (the former Tomintoul secondary school) delivered twelve affordable dwellings in 2023 accounting for 67% of the total. 33% of dwellings (6 in total) were built on small sites of less than four dwellings. Neither of the two allocated sites (totalling 16 dwellings) in Tomintoul have been developed. Both are owned by The Crown Estate Scotland and the Moray Council housing land audit 2024 (CNPA589) anticipates their development in the next five years.

In the Perth and Kinross Council part of the Cairngorms National Park, again, 100% of housing has been built on windfall sites since 2019. Eight affordable dwellings were built in Blair Atholl in 2020 on a site owned by Atholl Estates. While this site was allocated in the Cairngorms National Park Local Development Plan 2021, it was a large windfall site at the time of development. Four dwellings were built on small sites of less than four dwellings.

## Affordable housing

In the four years 2020 – 2023, of the 323 new houses completed in Badenoch and Strathspey, 23% (73 houses) were secured as affordable houses (Table 20).



Table 20 Housing completions in Badenoch and Strathspey in 2020 – 2023 (Highland Council).

Tenure type	2020	2021	2022	2023	Total	% of total
Market	49	20	89	91	249	77%
Affordable	19	0	29	25	73	23%
Total	68	20	118	116	322	100%

Within the Cairngorms National Park parts of the other constituent councils, 47% of houses built between 2020 – 2023 were delivered as affordable homes in Aberdeenshire Council; 71% were affordable homes in Moray Council and 80% were affordable homes in Perth and Kinross Council. These affordable homes were built on the 100% affordable housing sites referred to above.

See page 90 onwards for further information on housing need and demand, including benchmarking housing completions for each local authority and affordable housing need.

### **Implications of housing completions**

The average number of houses built per year in the Cairngorms National Park between 2000 and 2024 was 84 – giving an average 10 year period figure of 840 dwellings. This is an important benchmarking consideration in determining an indicative local housing land requirement.

The development of sites delivering 100% affordable housing in the Aberdeenshire, Moray and Perth and Kinross Council parts of the Cairngorms National Park demonstrates the role they can play in delivering a high percentage of new housing as affordable homes – in addition to the affordable housing proportion on market sites. Investment to continue to deliver 100% affordable housing sites will be an important contributor to the Cairngorms National Park Partnership Plan (CNPA010) objective that by 2030 75% of new dwellings built in the National Park are affordable homes. This evidence feeds into the implications for affordable housing set out from page 151.

### **Established housing land supply**

The adopted Local Development Plan 2021 (CNPA016) allocated a range of sites to meet its housing land requirement. This, together with windfall sites (non allocated sites with planning permission for at least four dwellings), provides an established housing land supply which is monitored through each constituent local authority's Housing Land Audit and the Local Development Plan Delivery Programme. Note that the Cairngorms



National Park Delivery Programme 2025 (CNPA334) was published in March 2025, before The Highland Council housing land audit 2024 (CNPA413) and the Aberdeen City and Aberdeenshire Council's housing land audit 2025 (CNPA574), referred to below, were published.

### **Implications of the established housing land supply**

The established housing land supply within the National Park is set out in Table 21. It identifies capacity for new 797 dwellings between April 2024 and March 2039. A proportion of this will be carried forward into the Proposed Plan, although the deliverability of these sites will have to be reassessed through the site assessment process. This will influence the scale of new allocations required to meet the indicative local housing land requirement.



Table 21 Established housing land supply for the Cairngorms National Park based on local authority housing land audits (constituent local authorities) for 2024 - 2039<sup>16</sup> (CNPA413, CNPA574, CNPA583, CNPA589).

Local authority	2024 - 2025	2025 - 2026	2026 - 2027	2027 - 2028	2028 - 2029	2029 - 2030	2030 - 2031	2031 - 2032	2032 - 2033	2033 - 2034		2034 - 2039	Totals
Highland Council	83	121	137	55	39	24	18	28	37	27		18	<b>587</b>
Aberdeenshire Council	0	1	11	33	39	29	24	21	0	0		0	<b>158</b>
Moray Council	0	0	4	4	0	4	4	0	0	0		0	<b>16</b>
Perth and Kinross Council	1	2	7	6	5	7	2	2	2	2		-	<b>36</b>
<b>Total – Cairngorms National Park</b>	<b>84</b>	<b>124</b>	<b>159</b>	<b>98</b>	<b>83</b>	<b>64</b>	<b>48</b>	<b>51</b>	<b>39</b>	<b>29</b>		<b>18</b>	<b>797</b>

<sup>16</sup> Notes:

- Highland Council Housing Land Audit 2024 (March 2025) (CNPA413) – yearly figures are for each financial year (April – March). Includes six identified windfall sites of four or more dwellings, which in total include 68 dwellings.
- Aberdeen City and Aberdeenshire Council Housing Land Audit 2025 (December 2025) (CNPA574) – yearly figures are for each financial year (April – March). There are no identified windfall sites (of four or more dwellings) in this part of the Cairngorms National Park.
- Moray Council Housing Land Audit 2024 / 25 (August 2024) (CNPA583) - yearly figures are for each financial year (April – March). There are no identified windfall sites (of four or more dwellings) in this part of the Cairngorms National Park.
- Perth and Kinross Council Housing Land Audit 2023 (March 2023) (CNPA578) – yearly figures are for each financial year (April – March). There are no identified windfall sites in this part of the Cairngorms National Park. 8 dwellings in audit for period 2030 – 2035 spread across years 2030 – 2031 to 2033 – 2034 above.



## Housing need and demand

Housing need is an assessment of the number of households lacking their own housing, or who live in housing which is not suitable or adequate – and who are unlikely to be able to meet their needs in the housing market without some assistance. Housing demand is the quantity and type of housing which households wish to buy or rent and can afford.

Local housing authorities produce several key housing assessments, strategies and plans that to help them understand the housing characteristics and needs within their area and identify what actions are needed and should be prioritised. These comprise:

- Housing Need and Demand Assessments, which are designed to give broad, long run estimates of what future housing need might be and provide an evidence base to inform housing policy decisions in local housing strategies and land allocation decisions in local development plans.
- Housing Land Audits, which support housing delivery and monitor the progress of housing sites through the planning process.
- Local Housing Strategies, which set out a local authority's strategy, priorities and plans for the delivery of housing and related services within their area. It is informed by the evidence set out in the Housing Need and Demand Assessment.
- Strategic Housing Investment Plans, which set out how investment in affordable housing will be directed to achieve the priorities that have been identified in a council's local housing strategy.

Homes for Scotland's research paper 'Existing Housing Need in Scotland', published in January 2024 (CNPA552), critiques the methodology used by the Housing Need and Demand Assessment tool to assess affordable housing need. The paper provides evidence that the need is much greater than the tool estimates. Nevertheless, it provides a consistent starting point.

As the Cairngorms National Park Authority is not a housing authority, it is not responsible for preparing the housing assessments, audits, strategies and plans that cover its area. Therefore, evidence of need and demand for the National Park must be drawn from the separate sets of housing assessments, audits, strategies and plans produced by its five constituent authorities – Aberdeenshire, Angus, Highland, Moray and Perth and Kinross. The reliance on evidence and data covering far wider geographic areas than the National Park's geography, makes identifying robust estimates for the type and tenure of housing required for the Cairngorms National Park complicated.



### Housing market areas

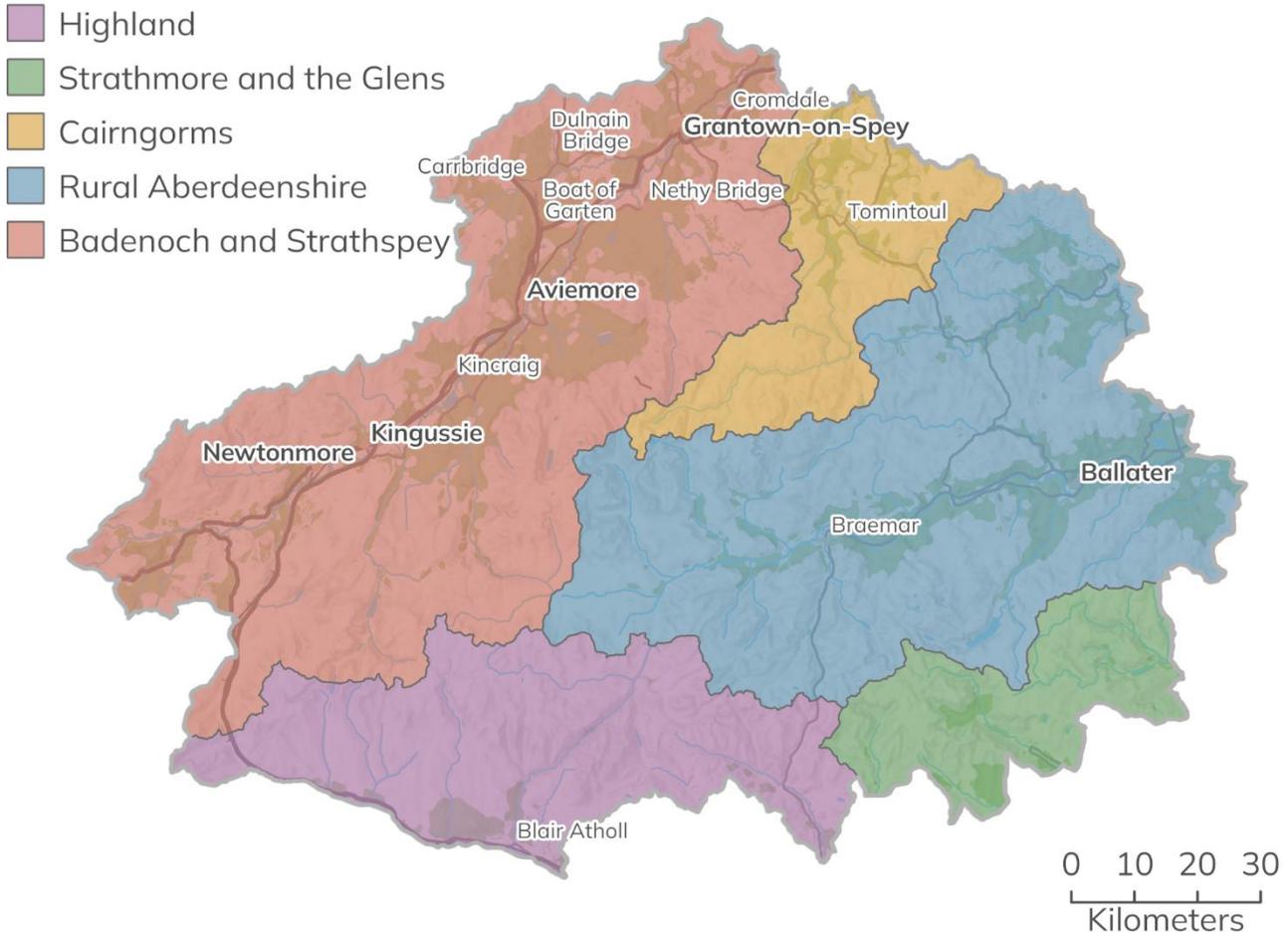


Figure 37 Housing market areas covering the Cairngorms National Park. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © Aberdeen City Council, Aberdeenshire Council, Angus Council, Highland Council, Moray Council and Perth and Kinross Council, 2026.

Naturally, this means that assessments and strategies are produced over, and cover, different time periods and do not always contain compatible or consistent data. In addition, the five housing market areas<sup>17</sup> that cover the Cairngorms National Park, relate to geographical regions of contrasting character and size (Figure 37) and to areas where the part within the Cairngorms National Park is often small and has different characteristics to the housing market area as a whole. Reconciling these studies is therefore often a difficult task in which gaps in information inevitably occur.

This paper sets out the evidence for need and demand according to the assessments and strategies of each local authority and their housing market areas:

<sup>17</sup> Housing market areas are functional areas that represent the spatial area where the majority of people moving house (without changing employment) search and purchase housing.



- The Highland Council (see page 92)
- Aberdeenshire Council (see page 115)
- Moray Council (see page 127)
- Perth and Kinross Council (see page 133)
- Angus Council (see page 140).

In addition to the local authority data, evidence of need can also be drawn from the Cairngorms National Park resident and worker survey 2024 – 2025 (CNPA538). While this data cannot be used to quantify need in terms of the housing land requirement, it does highlight the experiences, including barriers to finding affordable housing, of those living and working in the National Park. The survey findings, relevant to housing, are summarised on page 141.

## **The Highland Council**

### **The Highland Council Housing Need and Demand Assessment 2020**

The greatest geographical area of the National Park falls within The Highland Council's local authority area. This area is also home to approximately 75% of the National Park's population and is the area that has experienced the greatest population growth.

The Highland Council's Housing Needs and Demand Assessment 2020, third submission (CNPA126), was published in December 2021. The Centre for Housing Market Analysis advised that they considered the document to be 'robust and credible' in February 2022. The document provides estimates of future housing need and demand in Highland over the five years to 2024 and then in further five year periods to 2039. It estimates the additional dwellings required to meet projected growth in the number of households as well as to meet existing affordable housing need. It provides evidence to inform The Highland Council's housing strategy and local development plans, as well as the Cairngorms National Park local development plan.

The Highland Council has commissioned a new Housing Need and Demand Assessment, but its results will not be available until early 2026. The Cairngorms National Park Authority will take this into account in the preparation of its Proposed Plan.

The Highland Housing Needs and Demand Assessment 2020 identifies ten housing market areas, which are unchanged from those derived following the 2011 census. Badenoch and Strathspey is identified as a housing market area. Section 1.7 of the Housing Needs and Demand Assessment notes that small parts of the Badenoch and Strathspey housing market area lie out with the Cairngorms National Park's boundary



(an area around Advie, which contains 153 registered dwellings; two areas in the Monadhliath Mountains which have no dwellings; and an area around Laggan, which contains 20 registered dwellings).

The Housing Needs and Demand Assessment concludes that for most long term planning purposes, the housing stock within the housing market area as a whole and the housing stock within the National Park can be considered to be equivalent.

Highland Council's Housing Needs and Demand Assessment (2020) highlights that the population projections produced by National Records Scotland are based on the continuation of trends over the last two decades and the Highland Market Partnership has raised concerns that planning on this basis might result in a shortage of housing land that would constrain future economic growth.

The Housing Needs and Demand Assessment (paragraph 4.5.5) considers the 2018 household low migration, principal and high migration projections, concluding that the low migration and principal projections are unlikely to be correct, because of continuing expectations of net inward migration of over 1,000 people per year into to the Highland Council area.

The Housing Needs and Demand Assessment acknowledges that different housing market areas have different demographic characteristics and growth across Highland is not consistent. However, the Badenoch and Strathspey housing market area has one of the highest expected population growths in Highland, behind Inverness and its immediate surroundings.

The Housing Needs and Demand Assessment also considers existing need (backlog of need), based on an assessment of the current living arrangements of each applicant on the Highland Housing Register. Each individual record has been examined to ascertain whether the application requires a stock addition (in which case they are included in existing need), or an in-situ solution, which does not need a stock addition. In total, the Housing Needs and Demand Assessment identifies, as at April 2020, that there is an existing need for 2,236 new houses.

This figure is derived from the number of people identified who are currently either homeless, living in a hostel, living in a caravan, living in temporary accommodation, living or lodging with friends, or living with parents or relatives. Table 22 sets out these figures for both the Highland Council area and the Badenoch and Strathspey Housing



Market Area. In Badenoch and Strathspey, there is an identified existing need for 158 new houses.

Table 22 Existing (backlog) need, by current housing situation, for Badenoch and Strathspey (Highland Council, Housing Needs and Demand Assessment 2020) (CNPA126).

Reason for inclusion in backlog	Number of households	
	Badenoch and Strathspey Housing Market Area	The Highland Council
A – homeless	6	81
B – living in a hostel	6	61
C – living in a caravan	11	88
D – living in temporary accommodation	23	655
E – living or lodging with friends	33	233
F – living with parents of relatives	79	1,118
<b>Total number of households in existing need:</b>	<b>158</b>	<b>2,236</b>

This existing need, which is for social rental affordable housing, is added to the first ten-years (2020 – 2029) of the low migration, principal and high migration projections to create three scenarios.

In addition, to identifying this ‘existing need’, the Housing Needs and Demand Assessment process recognised that despite the building of a significant number of affordable houses since 2015, the impact on the backlog of existing need has been minimal. This was considered by an ‘In Year Arising Need’ paper (Appendix A Paper 2) (CNPA1427). It concludes that:

- There is an unprecedented level of need, that exceeds historic trends and is not captured in the trend based projections used to identify changing numbers of households requiring housing.
- The need was never being met by the current system, as demonstrated by lower than required delivery of affordable tenure housing (against Housing Needs and Demand Assessment 2015 figures) and the failure to reduce the backlog of need that we have demonstrated through monitoring of annual snapshot figures.
- House price rises and increasing and private rental costs against income are making household formation less possible into these tenures.



The In Year Arising Need paper proposes that an additional figure of 194 dwellings per year (across the Highland Council area) is a reasonable estimate of arising need and that this should be planned for in addition to existing need. This figure has been proportioned across the ten housing market areas based on the capacity of available stock in each housing market area to accommodate need.

The paper concludes that an additional 14 dwellings per year (for 2020 – 2039) should be added to the planned-for need in the Badenoch and Strathspey housing market area, to represent the ‘in year’ shortfall. This figure is similar to the proportion allocated to Skye and Lochalsh and Lochaber housing market areas. The in year arising need is catered for in the social rent and below market rental sectors across the Highland Council area based on a 69% / 31% split that assumes that the Housing Needs and Demand Assessment tool tenure proportions will continue through the period of the projections. The closest annual approximation of this for the 14 dwellings per year needed in the Badenoch and Strathspey housing market area is a 71% / 29% split (10 social rent and 4 below market rent) as set out in Table 23.

Table 23 Tenure split for in year arising need for Badenoch and Strathspey housing market area (Highland Council, Housing Needs and Demand Assessment 2020) (CNPA126).

In Year Arising Need Tenure Split	Badenoch and Strathspey housing market area		
	10-year	5-year	annual
Social Rent – 69%	97	48	10
Below Market – 31%	43	22	4
Total	140	70	14

The derived need and demand dwelling numbers for each housing market area are based on the 2018 high migration household projections, which estimate the number of new households which are likely to form in the area, plus existing need (over a 10 year period to clear the backlog) plus in year arising need. This is referred to as scenario 22 in the Housing Needs and Demand Assessment.

In summary, for the Badenoch and Strathspey housing market area, the annual need and demand total for the high migration plus in year arising need is 64 new dwellings per year between 2020 and 2024, 52 new dwellings per year between 2025 and 2029 and 30 dwellings per year between 2030 and 2039. This is set out in Table 24. Within these totals, for the period up to 2029, 71% of the need is for affordable housing, with 50% of this need for social rented housing. The all tenure housing figure reduces in each



subsequent five year period, because the projected rate of household growth slows down. This reduces the market housing demand over time.

Table 24 Five year period need and demand totals for the Badenoch and Strathspey housing market area under scenario 22 (high migration plus 'in year arising' need) (Highland Council, Housing Needs and Demand Assessment 2020) (CNPA126).

Badenoch and Strathspey housing market area	2020 – 2024		2025 – 2029		2030 – 2034		2035 – 2039	
<b>All-tenure housing figure</b>	<b>318</b>	<b>100%</b>	<b>261</b>	<b>100%</b>	<b>150</b>	<b>100%</b>	<b>150</b>	<b>100%</b>
<b>Market housing</b>	92	29%	56	21%	35	23%	30	20%
- Private rented stock	51	16%	32	12%	20	13%	20	13%
- Owner occupied	41	13%	24	9%	15	10%	10	6%
<b>Affordable housing</b>	<b>226</b>	<b>71%</b>	<b>205</b>	<b>79%</b>	<b>115</b>	<b>77%</b>	<b>120</b>	<b>80%</b>
- Social rented stock	158	50%	151	58%	70	47%	75	50%
Newly forming households	31		26		20		25	
Existing need	79		79		0		0	
In year arising	48		48		48		8	
- Below market	68	21%	54	21%	45	30%	45	30%
Newly forming households	46		32		25		25	
In year arising	22		22		22		22	
<b>Annual housing figure</b>	<b>64</b>		<b>52</b>		<b>30</b>		<b>30</b>	

Based on the figures in Table 24, the housing required for Badenoch and Strathspey housing market area, as adjusted to align with the National Park's timescales for the next local development plan, is as set out in Table 25. This indicates that there is a need for 78% of new housing to be affordable.

Table 25 Ten year all tenure, market and affordable housing figures for Badenoch and Strathspey based on scenario 19 (high migration plus existing need plus 'in year arising' need) adjusted to align with the Cairngorms National Park's timescales for the next local development plan. (Highland Council, Housing Needs and Demand Assessment 2020) (CNPA126).

	Local development plan period 2027 – 2036	
All tenure housing figure	366	



	Local development plan period 2027 – 2036	
Market housing figure	87	22%
Affordable housing figure	286	78%
Annual housing figure	37	

### **The Highland Council Local Housing Strategy 2023**

The Highland Council's Local Housing Strategy (CNPA410) was adopted in February 2023 and covers the five year period of 2023 – 2028. It therefore does not cover the next local development plan's period of 2027 – 2036. Nevertheless, it sets out that The Highland Council are responding to the housing crisis and the very high level of affordable housing need in the short term. The Local Housing Strategy states that the annual housing supply target for Highland for the years 2023 - 2028 has been set at 1,840 dwellings per annum, with a 40% target for affordable housing and a 60% target for market housing.

This equates to an overall housing supply target of 9,200 dwellings during the five year life of the Local Housing Strategy (2023 – 2028). This is approximately double the estimated level of housing need identified in the Housing Need and Demand Assessment (CNPA126), which, under scenario 22 - 'high migration plus in year need' – estimates a need for 9,037 new homes in Highland over 10 years (2020 – 2029).

Appendix 2 of the Local Housing Strategy provides the methodology for setting the housing supply targets. It explains that the Housing Need and Demand Assessment estimates identified a tenure split of 68% affordable housing and 32% market housing over the five year period 2019 / 2020 to 2023 / 2024.

This is a reverse of the tenure delivery profile of historic completions between 2017 / 2018 to 2021 / 2022, which had a tenure split of 27% affordable housing and 63% market housing, because the delivery of affordable housing relies of contributions from market housing. Hence, if housing supply targets were based on unadjusted Housing Need and Demand Assessment estimates, the strategy argues that it is likely that while the market housing would be delivered, the amount of affordable housing would be much less than the Housing Need and Demand Assessment indicates is required.



To give a local example (not included in the Local Housing Strategy), this is true for completions in the Badenoch and Strathspey housing market area between 2020 – 2023 (Table 20) where, as shown in Table 26, 23% of housing completions were affordable houses. This equates to 41% of the affordable housing need target, as set out in the Housing Need and Demand Assessment and contrasts with the number of market houses built, which was over three times as many market houses as the Housing Need and Demand Assessment calculates were required.

Table 26 2020 – 2023 housing completions for Badenoch and Strathspey housing market area, compared to market and affordable housing need and demand identified within the Housing Need and Demand Assessment, based on scenario 19 (high migration plus existing need plus 'in year arising' need) (Highland Council) (CNPA126).

	2020 – 2023 Housing Need and Demand Assessment target	2020 – 2023 housing completions	% of completions	% of Housing Need and Demand Assessment target
Market	76	249	77%	329%
Affordable	180	73	23%	41%
Total	256	322	100%	126%

The paper explains, the methodology for the housing supply targets should 'not assume market supply targets below the rate of historic completions as a baseline, whilst the estimated need for affordable housing should be projected and maintained in an attempt to address the backlog of housing need in Highland communities'. For Badenoch and Strathspey, this means a market housing starting point of 260 dwellings (based on five years of market housing completions).

The housing supply target methodology also adjusts the housing estimates for both market and affordable housing.

In relation to market housing, a 15% adjustment is added to each housing market area based on the economic development evidence. 30% is added to the East Ross, Inverness and Mid Ross housing market areas. This responds to draft proposals for the Inverness and Cromarty Firth Green Freeport.

Since the Local Housing Strategy was published, a detailed business case for the freeport has been developed. The Highland Council published, in June 2024, a briefing paper 'Inverness and Cromarty Firth Green Freeport Housing Supply Targets' (CNPA412), to recalibrate the housing supply targets to take account of this business



case. The paper, by Arneil Johnston, adopts a methodology used in a report published in November 2022 on the implications of East Midlands on housing need in North West Leicestershire. It is the only published example to date of aligning economic and housing growth assumptions to reflect the designation of Green Freeport status.

The paper explains that the detailed business case for the Inverness and Cromarty Firth Green Freeport estimates that 10,192 direct jobs will be created in the East Ross and Inverness Housing Market Areas and, taking into account existing jobs which may be lost or displaced during the 10 year period of the housing supply targets, estimates that 8,427 net direct jobs will result from the Green Freeport proposals – again in the East Road and Inverness housing market areas. The paper adjusts the housing supply targets for the East Road and Inverness housing market areas. While this significantly increases the housing targets for The Highland Council no adjustments are made to the housing supply targets in the Local Housing Strategy 2023 for the Badenoch and Strathspey housing market area.

Going back to the Local Housing Strategy 2023, the methodology paper does make an adjustment to reflect current levels of second homes in each housing market area, to counter the expectation that a proportion of future house completions will be 'lost' from the residential market. In Badenoch and Strathspey, 10% is added.

In relation to affordable housing, the methodology paper uses weightings to adjust the distribution of affordable housing in each housing market area. 25% of the overall affordable housing estimate is adjusted to reflect affordable housing pressure ratios and 25% is adjusted to reflect economic growth aligned to Opportunity Cromarty Firth.

The result of these adjustments, as set out in the methodology paper, is listed in Table 27 for market housing and Table 28 for affordable housing. The figures are provided for both the Badenoch and Strathspey housing market area and The Highland Council as a whole.

In relation to affordable housing, 25% of the overall affordable housing supply target is distributed to East Ross, Inverness and Mid Ross housing market areas to reflect Opportunity Cromarty Firth. 6% of the overall affordable housing supply target is redistributed to the Badenoch and Strathspey housing market area to reflect housing pressure (by far the highest proportion redistributed to reflect housing pressure). The result is that an additional 89 dwellings are added to the Badenoch and Strathspey housing market area affordable housing supply target.



Further analysis was then performed to test the delivery potential of the housing estimates by housing market area and tenure, taking account of established land supply over a 15 year period (2021 – 2036).

The outcome for the Badenoch and Strathspey housing market area and the Highland Council area as a whole is provided in Table 29. It indicates, for Badenoch and Strathspey, that the five year (2023 – 2028) housing supply target of 641 dwellings cannot be met by the current five year (2021 – 2026) effective land supply of 586 dwellings. However, taking account of the 10 year established land supply, which straddles the delivery period for the housing supply target, there is a surplus of 382 dwellings.

Taking account of this surplus, and surpluses in other housing market areas in The Highland Council area, The method paper concludes that there is 'scope to develop the land resources required' to meet the step change in housing supply the strategy proposes and that the five year housing supply targets for each housing market area and for Highland as a whole can be delivered. However, the Park Authority would note that this is broad brush analysis, and no analysis of the scope to develop the land resources in the Cairngorms National Park was undertaken.

Based on this The Highland Council wide analysis, five year housing supply targets (2023 – 2028) were set. Table 30 sets out the targets for the Badenoch and Strathspey housing market area and for Highland as a whole. The annual housing supply targets are set out in Table 31.



Table 27 Adjusted Housing Supply Targets for market housing for Badenoch and Strathspey housing market area and Highland Council as a whole (The Highland Council, Methodology Paper: Housing Supply Targets (Appendix 2 of the Highland Council Local Housing Strategy, 2023)) (CNPA410).

	Proposed market housing supply target starting point 2023 – 2028 (five year housing market completions)	Housing market area percentage market tenure estimate	Adjustment for ineffective stock (second homes)	Allowance for ineffective stock	Adjustment for economic growth	Addition for economic growth	Adjusted market housing target 2023 – 2028
Badenoch and Strathspey	260	5.7%	10%	26	15%	39	325
Highland	4,535	100%		180		1,092	5,807



Table 28 Adjusted Housing Supply Targets for affordable housing for Badenoch and Strathspey housing market area and Highland Council as a whole (The Highland Council, Methodology Paper: Housing Supply Targets (Appendix 2 of the Highland Council Local Housing Strategy, 2023)) (CNPA410).

	Housing Need and Demand Assessment Affordable Housing Need 2023 – 2028	Affordable Housing Need and Demand Assessment split: 50% weighting	Adjustment for housing pressure: 25% weighting	Housing pressure adjustment	Adjustment for economic growth: 25% weighting	Economic growth adjustment	Total adjusted affordable housing supply target 2023 – 2028
Badenoch and Strathspey	226	113	6%	202	0	0	315
Highland	3,396	1698	0%	849	25%	849	3,396

Table 29 Analysis of Adjusted Housing Supply Estimates for Badenoch and Strathspey housing market area and Highland Council as a whole (The Highland Council, Methodology Paper: Housing Supply Targets (Appendix 2 of the Highland Council Local Housing Strategy, 2023)) (CNPA410).

	Adjusted five year Housing Supply Target 2023 – 2028	Effective land supply 2021 – 2026	Housing land audit 2026 – 2031	Housing land audit 2031 – 2036	10 year established land supply 2021 – 2031	15 year established land supply 2021 – 2036	Shortfall / surplus five year established land supply	Shortfall / surplus 10 year established land supply
Badenoch and Strathspey	641	586	437	229	1,023	1,252	-55	382
Highland	9,203	6,626	4,237	2,475	10,863	13,338	-2,577	1,660



Table 30 Five year Housing Supply Targets 2023 - 2028 by tenure for Badenoch and Strathspey housing market area and Highland Council as a whole (Highland Council, Methodology Paper: Housing Supply Targets (Appendix 2 of the Highland Council Local Housing Strategy, 2023)) (CNPA410).

	Adjusted affordable Housing Supply Target	Adjusted market Housing Supply Target	Total Housing Supply Target 2023 - 2028	Affordable Housing Supply Target (%)	Market Housing Supply Target (%)
Badenoch and Strathspey	300	350	650	46%	54%
Highland	3,400	5,800	9,200	37%	63%

Table 31 Annual Housing Supply Targets 2023 – 2028 by tenure for Badenoch and Strathspey housing market area and Highland Council as a whole (Highland Council, Methodology Paper: Housing Supply Targets (Appendix 2 of the Highland Council Local Housing Strategy, 2023)) (CNPA410).

	Total Housing Supply Target	Affordable Housing Supply Target (%)	Market Housing Supply Target (%)
Badenoch and Strathspey	130	45%	55%
Highland	1,840	40%	60%

The Strategy also includes a delivery framework which comprises a series of more detailed action plans identifying the timescales, resources and partner responsibilities needed to progress and achieve these priorities.



### **The Highland Council Strategic Housing Investment Plan 2026 / 2031**

The Highland Council's Strategic Housing Investment Plan (CNPA411) was approved on 5 November 2025. It sets out proposals for affordable housing investment during 2026 – 2031.

This Strategic Housing Investment Plan reflects the currently agreed affordable housing investment programme and provides an interim strategy based on the Housing Need and Demand Assessment 2020 (CNPA126) and the Local Housing Strategy 2023 (CNPA410). A full refresh is proposed for next year's Investment Plan to reflect the findings of a new Housing Need Demand Assessment.

The plan explains that in June 2024, The Highland Council declared a 'Housing Challenge', the aim of which was to create a collaborative environment of public and private partnerships to assist in the delivery of affordable and private homes. The Housing Challenge recognises both the issues in meeting the current need for housing across communities in Highland and the anticipated future demand for housing based upon the economic opportunities coming to the area.

It explains that in June 2025, a Partnership Action Plan was agreed, outlining important areas of activity, targets and timescales and partner contributions and commitments for action in three key thematic areas – increasing finance for housing development, increasing land for housing development and increasing developer capacity. There is ongoing work by The Highland Council with the Scottish National Investment bank and pension companies to consider alternative sources of funding in new investment models, with a particular emphasis on the delivery of an increased number of mid market rent properties alongside the social rent offering and to attract build to rent investors to the area.

In addition, the council has a well established Landbank Fund, which is used to maximise housing provision by granting loans and grants to housing agencies. It also enables a landbank of strategic sites to be established throughout the Highlands; removal of infrastructure constraints and front-funding of projects at risk of delay. It can also contribute, in exceptional circumstance, to high cost rural projects.

The Highland Council targets investment to communities identified as having the greatest affordable housing pressures. In Badenoch and Strathspey, Aviemore is listed (in Annex 1) as the highest priority for housing, with all other communities (excluding Dalwhinnie) listed as priorities.



Across The Highland Council, the plan anticipates that it will be possible to approve 700 affordable dwellings each year. 70% will be for affordable rent and 30% for intermediate affordable housing (mid market rented housing or shared home ownership under the Low cost Initiative for First Time Buyers (LIFT)). The proposed mix of affordable tenures is to help to create well balanced communities, with an aim to provide a minimum of 10% of affordable houses built to a “wheelchair liveable standard” – that is to say meet both basic and desirable criteria as specified in housing for varying needs standards.

The overall target to deliver an average of 700 affordable houses a year is an increase of 200 units a year. The plan notes that this is a challenging target particularly given cost pressures, however it also redresses the lower allocation in the previous year.

The plan advises that the council plays a proactive role to enable the delivery of affordable housing and in recent years, as a result of a less confident housing market, the strategic housing investment plan has become less reliant on local development plan affordable housing policy to ensure sufficient levels of programming for the Council and other developing partners. The Highland Council use a variety of mechanisms including:

- Use of council land and assets
- Use of public land and assets
- Use of Council Tax revenue from second and long term empty homes
- Use of other council funding (the Landbank Fund)
- Developer opportunities
- Use of compulsory purchase orders
- Evergreen infrastructure fund
- Developer’s contributions
- Prudential borrowing

The delivery of 3,701 affordable dwellings is identified in the investment plan. A list of investment plan projects to 2031 is included (Appendix 3).

In Badenoch and Strathspey, the investment plan includes 223 affordable homes. As set out in Table 32, this includes 116 dwellings yet to complete, but anticipated to complete before April 2026 and 107 affordable homes to be delivered in the five years of the plan between 2026 and 2031. This is 2.9% of the total number of affordable houses in the strategic housing investment plan.



Table 32 Highland Council indicative planned investment programme for Badenoch and Strathspey 2026 - 2031 (Highland Council, Highland Strategic Housing Investment Programme 2026 - 2031 – Appendix 3) (CNPA411).

Site	Affordable Housing Provider	Pre 2025 / 2026 yet to complete	2026 / 2027	2027 / 8 to 2030 / 1	Total new homes five years (2026 / 27 – 2030 / 31)
Aviemore, former school site	The Highland Council	12			
Aviemore, Larig View	The Highland Council	2			
Aviemore, Morlich Court	Cairn Housing Association	18			
Aviemore, Reidhaven Estate (Dalfaber)	Highland Housing Alliance	5			
Aviemore, former ambulance depot	The Highland Council		9		
Aviemore, North site phase 1	The Highland Council			32	
Aviemore, health centre site	The Highland Council			20	
Cromdale, Tom an Uird phase 3	Community Housing Trust <sup>18</sup>			4	
Boat of Garten	Community Housing Trust <sup>19</sup>		2		
Dulnain Bridge	The Highland Council			6	
Grantown-on-Spey, west of health centre	Community Housing Trust <sup>19</sup>			6	

<sup>18</sup> Rural and Island Housing Fund projects



Site	Affordable Housing Provider	Pre 2025 / 2026 yet to complete	2026 / 2027	2027 / 8 to 2030 / 1	Total new homes five years (2026 / 27 – 2030 / 31)
Kincraig, Phase 2	Highland Housing Alliance		4		
Kincraig, Phase 2	The Highland Council		2		
Kinguissie, Kerrow Drive	Caledonia Housing Association	22			
Kingussie, Market Stance	The Highland Council			4	
Kingussie, St Vincents Hospital site	The Highland Council			16	
Nethy Bridge, Laing	Albyn Housing Society	21			
Newtonmore, phase 1	The Highland Council	12			
Newtonmore, phase 2	Highland Housing Alliance	8			
Newtonmore, phase 3	The Highland Council	16			
Open market purchases 2026 - 27	The Highland Council		2		
<b>Total</b>		<b>116</b>	<b>19</b>	<b>88</b>	<b>223</b>



### **Highland Housing Register 2024 – 2025**

The Highland Housing Register (CNPA1296) is the official combined waiting list for all social housing providers in The Highland Council area. It provides evidence on housing need, as of 1 April 2025. The Highland Housing Register Analysis Report (CNPA1291) provides a review of the data. Across The Highland Council area, there were 8,767 households (applicants) on the waiting list as of 1 April 2025.

The register highlights the prospects of becoming a tenant of an affordable dwelling by comparing the number of households on the waiting list to the number of lets which took place between 1 April 2024 and 31 March 2025.

In this year, there were a total of 1,620 lets. This means that there are 5.27 households on the waiting list per let. This is known as the pressure per let. Areas with more pressure per let have far more applicants on the waiting list (more demand) than supply.

In Badenoch and Strathspey there were 473 households on the register and 67 lets took place. This means that the pressure per let in the National Park part of The Highland Council was 7.06. This is above the Highland wide average, with only Inverness (8.70) and Nairn (7.67) having greater pressure per let. These totals are provided in the bottom row of Table 32.

Across The Highland Council area, 8 out of 10 (80%) of those housed had 'need to reside' points relating to a particular community within the Highlands. This means that they already live or work in that community or that they are giving or receiving care and support there (for example from family).

In areas with more pressure on its affordable housing, a greater proportion of lets went to those with a need to reside. In Badenoch & Strathspey, 97% of all housed applicants had 'need to reside' points. In Nairn, the figure was 98%.

Another way to assess the difference between supply and demand is to consider the number on the housing register against the total amount of affordable housing stock. The housing register analysis report states that there are 970 affordable dwellings in Badenoch and Strathspey. In other words, there are 970 households already housed in affordable housing in Badenoch and Strathspey and another 473 households in need. The total demand (1,444 households) is therefore far greater than the supply (971 dwellings). These totals are provided in the bottom row of Table 33.



The data also shows a significant supply and demand discrepancy for different age groups. Across The Highland Council area, 60% of those on the waiting list need a one bedroom property, but only 25% of affordable dwellings are one bedroom properties. By contrast, 23% of those on the waiting list need a two bedroom property and 44% of affordable housing stock has two bedrooms.

In Badenoch and Strathspey, the discrepancies are similar. What this means is that while the overall pressure per let is 7.06 - for bedsits and one bedroom properties, the pressure per let is much higher at 12.81. In contrast, for two bedroom properties it is much lower at 3.03. The pressure per let is similarly high (12.00) for four or more bedroom properties, while for three bedroom properties it is 7.70, similar to the overall pressure per let in Badenoch and Strathspey. However, the difference for larger properties is that only 5% of the demand is for properties of this size – with only 3% of the stock comprising four or more bedroom properties. It will be important to ensure, in the Proposed Plan, not only that new affordable housing provision is maximised, but that the new housing helps to rebalance affordable housing stock to reflect affordable housing need. These totals are provided in the bottom row of Table 33.

Table 33 Demand and supply of affordable housing and the number of lets undertaken in each property size in Badenoch and Strathspey between 1 April 2024 and 31 March 2025 (Highland Council Housing Register Prospects 2024 - 2025) (CNPA1291).

Number of bedrooms in property	Demand 1 April 2024		Supply 1 April 2025		Number of lets	Pressure per let
	Number on waiting list	%	Number of dwellings	%	Number of lets	Pressure per let
Bedsit or one bedroom	269	57%	255	26%	21	12.81
Two bedrooms	103	22%	500	52%	34	3.03
Three bedrooms	77	16%	187	19%	10	7.70
Four or more bedrooms	24	5%	28	3%	2	12.00
<b>Badenoch and Strathspey</b>	<b>473</b>		<b>970</b>		<b>67</b>	<b>7.06</b>

The Highland Housing Register provides figures for each settlement in Badenoch and Strathspey. This highlights that 53% of households on the waiting list want to be in Aviemore. However, only 43% of dwellings are in Aviemore. In addition, the number of lets over the past year have been low, meaning the pressure per let is 15.75. This



supports Cairngorms National Park Local Development Plan 2021 (CNPA016) Policy 1.5 which requires 45% of the total number of dwellings on a development site to be affordable housing.

The pressure in Grantown-on-Spey and Newtonmore is also higher than the average across The Highland Council area, suggesting that a higher threshold should also be applied in these settlements. Also of concern, there were no re-lets in Boat of Garten, Cromdale, Kincaig or Dalwhinnie in the past year meaning that no households in need were housed in their first choice location and additional affordable housing is required. This information is provided in Table 34.

Table 34 Demand and supply of affordable housing and the number of lets undertaken in each settlement in Badenoch and Strathspey between 1 April 2024 and 31 March 2025 (Highland Council Housing Register Prospects 2024 - 2025) (CNPA1291).

Lettings Area	Demand 1 April 2025 <sup>19</sup>		Supply 1 April 2025		Re-lets 1 April 2024 to 31 March 2025	
	Number on waiting list	%	Number of dwellings	%	Number of lets	Pressure per let
Aviemore	252	53%	403	42%	16	15.75
Grantown-on-Spey	73	15%	167	17%	7	10.43
Kingussie	39	8%	132	14%	24	1.63
Newtonmore	29	6%	37	4%	4	7.25
Boat of Garten	14	3%	32	3%	0	No lets
Carrbridge	26	5%	67	7%	10	2.60
Cromdale	4	1%	12	1%	0	No lets
Dalnain Bridge	4	1%	17	2%	1	4.00
Kincaig	10	2%	30	3%	0	No lets
Nethy Bridge	14	3%	54	6%	3	4.67
Dalwhinnie	1	0%	1	0%	0	No lets
Laggan	7	1%	18	2%	2	3.50

<sup>19</sup> Totals the first choice location of households on the Highland Housing Register's Housing List and Transfer List



Lettings Area	Demand 1 April 2025 <sup>19</sup>		Supply 1 April 2025		Re-lets 1 April 2024 to 31 March 2025	
	Number on waiting list	%	Number of dwellings	%	Number of lets	Pressure per let
<b>Badenoch and Strathspey</b>	<b>473</b>		<b>970</b>		<b>67</b>	<b>7.06</b>

### **Badenoch and Strathspey Business Insights**

The Highland Council and Cairngorms Business Partnership commissioned 56 Degree Insight to undertake the 'Badenoch and Strathspey Business Housing Needs Survey' (CNPA566) of businesses in 2021, to better understand why almost a third (29%) of businesses in the area predicted that a lack of affordable housing for staff to live in would be a major problem. The key findings were:

- One in eight staff employed in the area live outside Badenoch and Strathspey.
- The number of positions businesses sought to recruit for had increased in 2018 – 2020, but the number of applicants had decreased, with 38% noting a decrease in local applicants, particularly in the hospitality and retail sectors.
- 56% of businesses indicated that from 2018 – 2020, they had experienced an individual not taking up a job offer, with over 50% of those candidates citing lack of accommodation and / or lack of transport options in the area.
- Overall, the survey estimates that this could mean 500 positions (30% of the total) will be difficult to fill over the next 12 months.
- Recruitment and retainment of vital roles such as cleaning and housekeeping, chefs and other kitchen staff is the issue of greatest concern raised, which often relates to middle income bands and younger people.
- Businesses also indicated that they are affected indirectly by this issue, such as hospitality venues opening shorter hours due to shortage of staff, a lack of tradespeople and a lack of affordable accommodation for contractors.

The Cairngorms Business Barometer – Quarter 1 (January to March) 2024 report (CNPA192) indicates that the issue remains just as strong a concern with the lack of housing most often cited as the issue with recruiting staff.

### **The Highland Council summary and indicative housing land requirement**

The starting point for considering an indicative housing land requirement is the Scottish Government's ten year minimum all tenure housing land requirement for the Cairngorms



National Park of 850 dwellings<sup>20</sup>. This is calculated by considering existing and projected housing need within the National Park in three constituent authorities, including The Highland Council.

Table 35 Summary of the housing evidence figures relevant to the Highland Council part of the Cairngorms National Park, for the period of the local development plan 2027 – 2036. (Highland Council and Scottish Government) (CNPA545, CNPA546, CNPA126, CNPA1362).

All tenure	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Government minimum all tenure housing land requirement (derived figure for Highland Council)	65	65	65	65	65	65	65	65	65	65	645
Housing Need and Demand Assessment 2020 – 2039	52	52	52	30	30	30	30	30	30	30	367
Housing Supply Target 2023 – 2028	130	-	-	-	-	-	-	-	-	-	-

Market housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2020 – 2039	11	11	11	7	7	7	7	7	6	6	79
Housing Supply Target 2023 – 2028	72	-	-	-	-	-	-	-	-	-	-

Affordable housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2020 – 2039	41	41	41	23	23	23	23	23	24	24	287
Housing Supply Target 2023 – 2028	59	-	-	-	-	-	-	-	-	-	-
75% of the Government minimum all tenure housing	48	48	48	48	48	48	48	48	48	48	483

<sup>20</sup> As set out under National Planning Framework 4 Policy 16 (CNPA008).



Affordable housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
land requirement (derived figure for The Highland Council) <sup>21</sup>											

Table 35 summarises the housing evidence relevant to the local development plan period 2026 – 2037 for The Highland Council part of the Cairngorms National Park to derive an indicative housing land requirement. The key points are that:

- In their methodology (CNPA5465), the Scottish Government identifies a default 10 year housing need figure for Highland Council of 514 dwellings (76% of the total for Cairngorms National Park). Taking account of the 30% flexibility allowance and rounding to arrive at 850 dwellings, the Highland Council part of the 10 year all tenure minimum local housing requirement is 645 dwellings.

Since the publication of the Minimum all tenure housing land requirement, the following new evidence has been published:

- The Housing Need and Demand Assessment (CNPA126) estimates a 10 year all tenure housing need of 366 dwellings between 2027 – 2036. Despite being based on the high migration scenario, the identified housing demand is well below the Scottish Government’s identified all tenure figure. This is because the household growth rate is projected to slow down over the local development plan period. However, the affordable housing need is very high and represents around 78% of the total, averaging at 29 affordable houses per year.
- The Local Housing Strategy (CNPA410) sets a housing supply target for 2023 – 2028. While this does not cover the next local development plan’s period, it provides the methodology for how The Highland Council are responding to the acute affordable housing need in the short term. It redistributes affordable housing need across the Highland Council’s housing market areas to reflect where economic growth is expected and where there is greatest housing pressure. Badenoch and Strathspey housing market area is identified as the area with the greatest housing pressure. This results in a housing supply target of 59 affordable dwellings per year up to 2028. To meet this target and to respond to Highland’s ambitions for economic growth, 72 market dwellings are targeted each year. This would result in 45% affordable housing and 650 new dwellings over the five year period 2023 – 2028.

<sup>21</sup> Indicates the amount of affordable housing which would be delivered if the Cairngorms National Park Partnership Plan 2022 – 2027 (CNPA010) target of 75% of all is applied to the Government’s minimum all-tenure housing land requirement.



(130 dwellings per year). If this approach was extrapolated over the 10 years of the next local development plan period, it would be necessary to plan for 1,300 dwellings for The Highland Council part of the Cairngorms National Park in the next local development plan.

- This would be a significant uplift on both the housing land requirement in the adopted Local Development Plan 2021 (CNPA016), and the current build rate. Benchmarking this against completions in the Highland area of the Cairngorms National Park, highlights that, on average, 69 dwellings were built per year between 2013 and 2023, although this has increased, with 118 completions in 2022, 116 in 2023 and 105 in 2024 (see Table 17). Planning for 130 dwellings per year would be an unrealistic uplift, much higher than historic completions.
- Highland Council's housing land audit 2024 (CNPA413) indicates that there is a five year (2024 – 2029) established housing land supply of 435 dwellings (87 dwellings per year), however this reduces to 134 dwellings (27 dwellings per year) between 2029 – 2034 (see Table 21).
- While the affordable housing need within Badenoch and Strathspey is very high, the National Park Authority already seeks 45% affordable housing provision on new development in its larger settlements, and the Partnership Plan (CNPA010) targets that 75% of new housing is for social rental, mid market rental or other affordable categories that provide affordability in perpetuity.
- The identified affordable housing need, taking account of the Local Housing Strategy 2023 – 2028 (CNPA410), is 304 affordable dwellings for the local development plan period. An appropriate affordable housing requirement can be set on a settlement by settlement basis. Conclusions relating to affordable housing need across the Cairngorms National Park and how to meet the very high levels of need is set out on page 151.
- This new evidence published since the Scottish Government's minimum housing land requirement was published, indicates that the identified 10 year all tenure minimum housing land requirement figure for Highland Council of 645 dwellings is ambitious and higher than the evidenced need. There is sufficient buffer, above evidenced need, within this figure to respond to the pressures put on the housing market by the high level of second homes and short term lets outlined in this schedule.
- The figure of 645 dwellings is considered achievable, when benchmarked against existing completion rates, the established housing land supply and the infrastructure first evidence set out in Schedule 9: Energy; Schedule 10: Zero waste; Schedule 11: Sustainable transport; Schedule 12: Living locally and 20 minute neighbourhoods; Schedule 14: Education; Schedule 17: Play, recreation, sport Schedule 18: Health and safety; Schedule 19: Flood risk and water management; Schedule 20: Digital



infrastructure; and cross boundary infrastructure capacity outside the Cairngorms National Park.

- It is proposed that the indicative local housing requirement should be based on the Scottish government's minimum all tenure housing land requirement. This would achieve both the identified affordable housing need and market housing demand for 2027 – 2036.

## **Aberdeenshire Council**

### **Aberdeen City and Shire Councils Housing Need and Demand Assessment 3: 2023 – 2028**

The Housing Need and Demand Assessment 3: 2023 – 2028 (CNPA567) was published in January 2024 and signed off by the Scottish Government Centre for Housing Market Analysis as being robust and credible in January 2024.

It identifies two housing market areas – the Aberdeen housing market area comprising Aberdeen City (and a 20 mile radius) and the Rural housing market area which covers the rest of Aberdeenshire including the Cairngorms National Park.

The Cairngorms National Park forms a relatively small part of the Aberdeen City and Aberdeenshire area, with the estimated population of the National Park within the Aberdeenshire area totalling around 3,000 people in 2022, which is just 0.6% of the total in Aberdeen City and Aberdeenshire and 2.2% of the Aberdeenshire Rural housing market area.

The Housing Need and Demand Assessment sets out annual household income by area and this highlights that median and lower quartile house prices are significantly higher in the Cairngorms National Park area of the Rural housing market area than in the Rural housing market area as a whole. Household incomes are also higher, but not proportionally so. This means houses are less affordable for local people in the Cairngorms National Park part of the Aberdeenshire Rural housing market area. This is shown in Table 36, which extracts data from Tables 2.18 – 2.20 of the Housing Need and Demand Assessment.

Buying a house is unaffordable if the house price to household income ratio is more than four (coloured red), and affordable if it is below four (green). Using this measure, households with lower quartile income cannot afford to buy a lower quartile house in any part of Scotland and the ratio is significantly higher (7.5) in the Cairngorms National Park part of the Rural Housing Market Area. This reflects the housing market context analysis earlier in this evidence report.



It is informative to note that the Housing Need and Demand Assessment states that the ratio in Aberdeenshire as a whole, including in the Rural housing market area is lower and hence affordability better now than at the time of the last Housing Need and Demand Assessment. It is not clear that this applies to the Cairngorms National Park part of Aberdeenshire however, where lower quartile house prices remain unaffordable for those on median household incomes.

More fine grained analysis in the Housing Need and Demand Assessment shows that there is considerable variation in house prices within the Rural housing market area and that generally, lower prices (a lower quartile house price of less than £100,000) are found in the more peripheral parts of the housing market area. The Housing Need and Demand Assessment suggests that this may enable households to find houses that they can afford in other parts of the Rural housing market area, if they are able to move. However, these examples are mainly in the north of Aberdeenshire (Peterhead, Fraserburgh, Banff / Macduff, Turriff and Huntly), not in the peripheral parts of the Rural housing market area within the Cairngorms National Park.

Table 36 House price to income affordability ratios by area (Aberdeenshire Housing Need and Demand Assessment 3: 2023 - 2028). Buying a house is unaffordable if the house price to household income ratio is more than four (coloured red), and affordable if it is below four (green) (CNPA567).

Geography	House price 2019 / 2020		Annual household income by area 2018		House price to income affordability ratios by area		
	Lower quartile price	Median price	Lower quartile income	Median income	Lower quartile price / lower quartile income	Lower quartile price / median income	Median price / median income
Scotland	£100,000	£156,000	£17,160	£28,600	5.8	3.5	5.5
Aberdeenshire rural housing market area	£110,000	£165,000	£18,720	£32,240	5.9	3.4	5.1
Cairngorms National Park part of the rural housing market area	£156,875	£195,300	£20,800	£34,320	7.5	4.6	5.7



The Housing Need and Demand Assessment provides commentary on the numbers of second homes. Broadly, the average proportion of second homes in Aberdeenshire is 1%, similar to the Scotland average proportion of 0.9%. However, the assessment highlights that the proportion rises to 2.45% in the Marr administrative area. Marr includes Ballater and Braemar, both of which are in the Cairngorms National Park. It also includes smaller villages (including Dinet and Strathdon in the National Park) where, the Housing Need and Demand Assessment states, the availability of social rented stock is limited and there are also very few private rentals.

The assessment advises that local intelligence suggests that many people work locally in Braemar and Ballater and do not want to travel further. The assessment also highlights that the main employment sectors in this area are hospitality, accommodation and retail, which is typically seasonal and low paid work, meaning private rental properties, if available, would not be affordable for most. Note also that Ballater and Braemar are identified as two of the 'most pressured settlements in Aberdeenshire'. These settlements have been identified by ranking all settlements based on housing need (based on average waiting list demand and turnover of stock). Ballater ranks 15th most pressured and Braemar 24th<sup>22</sup>.

The Housing Need and Demand Assessment models four different population and household growth scenarios which comprise the Housing Needs and Demand Assessment Tool's Default (scenario 1), Principal Growth (scenario 2), High Migration (scenario 3) and High Migration Plus (scenario 4).

The Housing Needs and Demand Assessment advises (pages 143 and 172) that a high migration plus scenario was deemed necessary due to concerns that the 2018 National Records for Scotland's projections (which are also used by the Scottish Government to calculate the All Tenure Minimum Housing Land Requirement) were relatively outdated and may underestimate future growth. The High Migration Plus scenario shares similar assumptions and variables to the high migration scenario, but with a household growth adjustment of 0.2% for the Aberdeenshire Rural housing market area between 2023 – 2028. It aims to provide an alternative estimate which factors in the short term impact of future need from refugees, asylum seekers and resettlement groups (for example from Ukraine).

The default scenario calculates an existing need for 880 dwellings across Aberdeen City and Aberdeenshire using the Housing Need and Demand Assessment tool. A local

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<sup>22</sup> Table 4 and explanatory text in the Aberdeenshire Local Housing Strategy, September 2024 (CNPA568)



authority generated existing need figure of 1,236 dwellings (247 dwellings for the Rural housing market area) has also been calculated and added to the first 10 years of the housing estimates calculated for scenarios two, three and four.

These scenarios, set out in Table 37, estimate an annual existing and future housing need for the Rural housing market area of between 352 and 517 new dwellings over the period 2023 – 2027, and between 226 and 300 for the 2028 – 2032 period.

The Housing Need and Demand Assessment does not identify a preferred scenario, instead highlighting that the results will be monitored through the Local Housing Strategy and a mid term review of the Housing Need and Demand Assessment. It does note that there is a substantial increase in the number of dwellings required in scenario four when compared to scenarios one and two, as well compared to scenario three.

Table 37 Additional housing units needed, per annum, for each five year band in the Aberdeenshire Rural housing market area, for scenarios 1 – 4 (Aberdeenshire Council, Housing Needs and Demand Assessment 3: 2023 – 2028) (CNPA567).

Scenario	2023 – 2027	2028 – 2032	2033 – 2037	2038 – 2042
Scenario 1 (Default)	371	226	178	158
Scenario 2 (Principal growth)	352	251	178	158
Scenario 3 (High migration)	386	300	237	228
Scenario 4 (High migration plus)	517	300	237	227

Table 38 sets out the figures for each tenure for the principal (scenario two) and high migration (scenario three) options. It estimates the need for high levels of affordable housing of 49% over the first 10 years (2023 – 2032) and 43% over the next 10 years (2033 – 2042).

Table 38 Additional housing units needed, per annum, for each five year band by tenure, in the Aberdeenshire Rural Housing Market Area, for scenarios 2 and 3 (Aberdeenshire Council, Housing Needs and Demand Assessment 3: 2023 – 2028) (CNPA567).

Aberdeenshire rural housing market area	2023 – 2027		2028 – 2032		2033 – 2037		2038 – 2042	
<b>Scenario 2 (Principal growth)</b>	<b>352</b>		<b>251</b>		<b>178</b>		<b>158</b>	
<b>All tenure housing figure</b>								
<b>Market per year</b>	<b>181</b>	<b>52%</b>	<b>127</b>	<b>52%</b>	<b>101</b>	<b>57%</b>	<b>90</b>	<b>57%</b>



Aberdeenshire rural housing market area	2023 – 2027		2028 – 2032		2033 – 2037		2038 – 2042	
- Private rented stock	75		51		39		34	
- Owner occupied	106		76		62		56	
<b>Affordable per year</b>	<b>171</b>	<b>49%</b>	<b>124</b>	<b>49%</b>	<b>77</b>	<b>43%</b>	<b>68</b>	<b>43%</b>
- Social rent	100	28%	77	31%	40	22%	33	21%
Newly forming households	75		52		40		33	
Existing Need	25		25		0		0	
- Below market	71	20%	47	19%	37	21%	35	22%
<b>Scenario 3 (High migration)</b>	<b>386</b>		<b>300</b>		<b>237</b>		<b>228</b>	
<b>Market per year</b>	<b>200</b>	<b>52%</b>	<b>154</b>	<b>52%</b>	<b>132</b>	<b>57%</b>	<b>130</b>	<b>57%</b>
- Private rented stock	83		62		52		49	
- Owner occupied	117		92		82		81	
<b>Affordable per year</b>	<b>186</b>	<b>48%</b>	<b>146</b>	<b>48%</b>	<b>103</b>	<b>43%</b>	<b>98</b>	<b>43%</b>
- Social rent	108	28%	88	29%	54	22%	48	21%
Newly forming households	83		63		54		48	
Existing Need	25		25		0		0	
- Below market	78	20%	58	19%	49	21%	50	22%

Housing need is not provided at the Cairngorms National Park level, so the Aberdeenshire Rural housing market area is the closest equivalent for calculating need for the Cairngorms National Park’s Local Development Plan.

One crude method of estimating housing need in the Cairngorms National Park from the Housing Need and Demand Assessment figures, is to disaggregate the figure based on population. 2.2% of the population of the Rural housing market area lives in the Cairngorms National Park, therefore it could be assumed that 2.2% of the housing need is in the Cairngorms National Park. Table 39 sets out the likely need and demand for the Cairngorms National Park for the high migration scenario using this population based method. The figures relate to the timeframe for the Local Development Plan (2027 – 2037).

Table 39 Ten year scenario 3 (high migration) need and demand figures for the Cairngorms National Park part (based on population) of Aberdeenshire rural housing market area adjusted to align with the Cairngorms National Park’s timescales for the next local development plan (Aberdeenshire Council, Housing Needs and Demand Assessment 3: 2023 – 2028) (CNPA567).



Housing Need and Demand Assessment 2023 - 2028 rural housing market area (population based proportion – 2.2%) – high migration	Local development plan period 2027 – 2036	
All tenure housing figure	62	
Market housing figure	33	53%
Affordable housing figure	29	47%
Annualised housing figure	6	

### **Aberdeenshire Council Local Housing Strategy 2024 – 2029**

The Local Housing Strategy 2024 – 2029 (CNPA568) was published in September 2024. It uses evidence from the Aberdeen City and Aberdeenshire Housing Needs and Demand Assessment 2023 – 2028 to inform the strategy and enable a supply of housing across all tenures.

The strategy includes a housing supply target Methodology paper (CNPA569), which sets housing supply targets for Aberdeenshire for the next five, 10 and 20 year periods. It utilises the high migration scenario and highlights that the recent Homes for Scotland report on existing housing need in Scotland (CNPA552) would support this. The strategy advises that the High Migration Plus scenario is not used as the basis for setting the housing supply target because of the uncertainty over likely future numbers of refugees and asylum seekers and the very high numbers of additional houses it generates in the first five years, which is considered unrealistic from a delivery perspective.

The methodology paper sets an average housing supply target for Aberdeenshire of 1,000 dwellings per year over the 20 year period has been set, with a target of 250 affordable dwellings per annum and 750 market dwellings. It highlights that the target for market dwellings per year (750 dwellings for the whole of Aberdeenshire) is well in excess of the number identified in the Housing Need and Demand Assessment high migration scenario 20 year average market dwellings per year (283 dwellings) and has been calculated to achieve 250 affordable dwellings per year. It is noted that the affordable housing need identified in the Housing Need and Demand Assessment for the first five years (2023 – 2028) is significantly higher than past delivery (a need for 326 affordable dwellings per year, with a delivery rate of around 200 dwellings per year), but that after the first five years the affordable need drops to 255 dwellings per year from 2028 – 2032, then 181 in 2033 – 2037, then 172 dwellings in 2038 – 2042. This gives an average need of 234 dwellings per year over the whole 20 year period. A



target of 250 affordable housing completions per year is proposed to ‘consistently address the level of need arising over the whole period’ and to ‘be realistic in terms of delivery in the short term’.

The 1,000 dwelling housing supply target has been split 55 / 45 between the Aberdeen and Rural housing market areas, leading to the housing supply target for the Rural housing market area set out in Table 40. If the target for the Cairngorms National Park area of Aberdeenshire is calculated by population size (2.2% of the population of the rural Aberdeenshire rural housing market area), the housing supply target would be as set out in Table 41. This would be a housing supply target of 100 dwellings for the local development plan 10 year period, with 28% to be secured as affordable housing.

Table 40 Annualised draft housing supply target for Aberdeenshire Rural housing market area (Aberdeenshire Council, Aberdeenshire Council Local Housing Strategy 2024 – 2029: Appendix 2: Housing supply target methodology paper) (CNPA569).

	For each year from 2023		Total 2023 – 2042
<b>Market housing per year</b>	338	75%	6,750
Private rent	179	40%	3,577
Owner occupied	159	35%	3,173
<b>Affordable housing per year</b>	112	25%	2,250
Social rent	101	22%	2,025
Below market	11	3%	225
<b>Total per year</b>	<b>450</b>		<b>9,000</b>

Table 41 Proportional (based on 2.2% population) housing supply target for the Cairngorms National Park part of Aberdeenshire’s rural housing market area, aligned for the local development plan time period (Aberdeenshire Council, Aberdeenshire Council Local Housing Strategy 2024 – 2029: Appendix 2: Housing supply methodology paper) (CNPA569).

Local Housing Strategy 2024 – 2029 Housing land supply rural housing market area (population based proportion – 2.2%)	For each year from 2024 – 2042	Local Development Plan period 2027 – 2037
Market housing – 75%	7.5	75
Affordable housing- 25%	2.5	25
Total	10	100



### **Aberdeenshire Council Local Development Plan 2029 Evidence Report - Quality Homes Topic Paper (September 2024)**

The topic paper (CNPA571) prepared for Aberdeenshire Council's evidence report, proposes an indicative 10 year housing land requirement for Aberdeenshire. To set this, the housing supply target is first adjusted to exclude the Cairngorms National Park area. This adjusted figure is 9,800 for a 10 year period. This adjusted figure is based on the assumption that the Cairngorms National Park Authority will set a figure of 200 dwellings over 10 years as its housing land requirement for the Aberdeenshire part of the Cairngorms National Park Authority in its next local development plan.

The topic paper notes that the Scottish Government's minimum all tenure housing land requirement for the Cairngorms National Park is 850 dwellings and that related method paper assumes that approximately 20% of the minimum figure (which equates to 170 units) will be in Aberdeenshire.

The topic paper does recognise that The Cairngorms National Park Authority figure will be subject to land availability in Ballater, Braemar and Dinnet, which is known to be constrained, and that Aberdeenshire Council and the Cairngorms National Park Authority will need to continue to work together to meet housing need. It is the Cairngorms National Park Authority view that a housing target of 200 dwellings for the Aberdeenshire Council part of the National Park is not achievable, based on historic completions rates.

### **Aberdeenshire Council Strategic Housing Investment Plan 2023 – 2028**

Aberdeenshire Council's Strategic Housing Investment Plan (CNPA570), published in November 2023, sets out the investment priorities for affordable housing over the five year period from 2024 to 2029. The Strategic Housing Investment Plan does not apportion investment resources to specific locations however it does identify settlements with increased housing pressure and in respect of the National Park, Ballater is identified as a medium priority.

The Strategic Housing Investment Plan notes that there is significant pressure on one bedroom units and larger three, four and five bedroom units and particular needs housing stock. Aberdeenshire Council identify that at least 15% of affordable new build housing will be allocated to particular needs households<sup>23</sup>. Of this 15%, 10% is required

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<sup>23</sup> Particular needs households include those with specific requirements due to age, disability, or other factors.



to be wheelchair accessible and they will encourage 10% of all new private housing developments of more than 20 units to be wheelchair accessible.

The Strategic Housing Investment Plan identifies the potential for 1,972 new affordable homes, of which 445 will be delivered through existing landbanks owned by the affordable housing providers. The other 74% will be through contributions from private housebuilders, highlighting the dependence on consistent delivery of market housing to generate affordable provision.

Aberdeenshire has taken a collaborative approach to bringing empty properties back into use during 2022 / 2023. This includes a registered social landlord converting an empty property in Ballater into 12 energy efficient affordable homes for social rent, three of which are suitable for particular needs housing.

The related Project Plan anticipates that 15 mid market rent affordable homes will be constructed on the Kindrochit Court site at Braemar (Local Development Plan 2021 housing site H3 (CNPA016)). Five of these will be particular needs housing and two will be wheelchair accessible. It is anticipated that construction will start in 2025 / 2026 and complete in 2026 / 2027.

### **Housing Needs Survey Report for Strathdon Community Development Trust (March 2023)**

Undertaken by the Communities Housing Trust, the report (CNPA806) concludes that there is demand for 41 houses in the Strathdon area with a mix of affordable tenures and open market sales being most appropriate. It indicates a shortage of affordable housing, which the report notes is seen in many rural areas in Scotland.

It recommends provision of affordable housing as part of a mixed development including open market housing and community facilities, which, it advises, could address some this housing need and the negative impacts this leads to on the community and local businesses, through young people leaving the area. The survey evidence suggests the need is for mainly two and three bedroom dwellings with some smaller and larger homes for low cost rent and low cost home ownership, plus self build plots.

### **Aberdeenshire Council summary and indicative housing land requirement**

The starting point for considering an indicative housing land requirement is the Scottish Government's 10 year minimum all tenure housing land requirement for the Cairngorms National Park of 850 dwellings. This is calculated by considering existing and projected



housing need within the National Park in three constituent authorities, including Aberdeenshire Council.

Table 42 Summary of the housing evidence figures<sup>24</sup> relevant to the Aberdeenshire Council part of the Cairngorms National Park, for the period of the local development plan 2027 – 2036. (Aberdeenshire Council and Scottish Government) (CNPA545, CNPA546, CNPA567, CNPA569).

All tenure	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Government minimum all tenure housing land requirement (derived figure for Aberdeenshire Council)	17	17	17	17	17	17	17	17	17	17	170
Housing Need and Demand Assessment 3 (2.2% population based figure)	8	7	7	7	7	7	5	5	5	5	62
Housing Supply Target 2023 – 2042 (2.2% population based figure)	10	10	10	10	10	10	10	10	10	10	100

Market Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 3 (2.2% population based figure)	4	3	3	3	3	3	3	3	3	3	33
Housing Supply Target 2023 – 2042 (2.2% population based figure)	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5	75

Affordable Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 3 (2.2% population based figure)	4	4	3	3	3	3	2	2	2	2	29

<sup>24</sup> All figures rounded to nearest whole number.



Affordable Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Supply Target 2023 – 2042 (2.2% population based figure)	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	25
75% of the Government minimum all tenure housing land requirement (derived figure for Aberdeenshire Council) <sup>25</sup>	13	13	13	13	13	13	13	13	13	13	128

Table 42 summarises the housing evidence relevant to the local development plan period 2026 – 2037 for the Aberdeenshire Council part of the Cairngorms National Park in order to derive an indicative housing land requirement. The key points are that:

- In their methodology (CNPA5465), the Scottish Government identifies a default 10 year figure 10 year housing need figure for Aberdeenshire Council of 135 dwellings (20% of the total for Cairngorms National Park). Taking account of the 30% flexibility allowance and rounding to arrive at the total of 850 dwellings, the Aberdeenshire Council part of the 10 year minimum all tenure local housing requirement is 170 dwellings.

Since the publication of the Minimum all tenure housing land requirement, the following new evidence has been published:

- Based on 2.2% of the population of the Aberdeenshire rural housing market area being within the Cairngorms National Park, the Housing Need and Demand Assessment (CNPA567) estimates a 10 year all tenure housing need of 62 dwellings between 2027 – 2036. Significantly below the minimum all tenure local housing requirement (170 dwellings) for the Aberdeenshire Council area. The affordable housing need represents around 47% of the total, totalling 29 affordable houses over ten years.
- The Local Housing Strategy sets a Housing Supply Target for 2024 – 2042 (CNPA569). Based on 2.2% of the population of the rural housing market area residing in the National Park, the housing supply target for the Cairngorms National Park part of Aberdeenshire Council would be 100 dwellings over a 10 year period.

<sup>25</sup> Indicates the amount of affordable housing which would be delivered if the Cairngorms National Park Partnership Plan 2022 – 2027 (CNPA010) target of 75% of all is applied to the Government's minimum all tenure housing land requirement.



Still significantly below the minimum all tenure local housing requirement for Aberdeenshire Council.

- Completions in the Aberdeenshire part of the National Park averaged 12 dwellings per year (120 for 10 years) between 2013 and 2023 and this average has remained similar in recent years (see Table 17). 47% of the dwellings that were built between 2020 and 2023 were affordable dwellings, through one 100% affordable housing site in Braemar. This is also below the minimum all tenure local housing requirement for Aberdeenshire Council.
- The housing land audit 2025 (CNPA574), as set out in Table 21, indicates that there are 84 dwellings in the five year established housing land supply (2024 – 2029). There are a further 74 dwellings in the following five years of the audit. This means that there is a current 10 year pipeline of 158 dwellings (16 dwellings per year).
- This new evidence published since the Scottish Government's minimum housing land requirement was published indicates that the identified 10 year all tenure minimum housing land requirement figure for Aberdeenshire Council of 170 dwellings is ambitious and higher than the evidenced need. There is sufficient buffer, above evidenced need, within this figure to respond to the pressures put on the housing market by the high level of second homes and short term lets outlined in this schedule.
- The figure of 170 dwellings is considered achievable, when benchmarked against existing completion rates, the established housing land supply and the infrastructure first evidence set out in Schedule 9: Energy; Schedule 10: Zero waste; Schedule 11: Sustainable transport; Schedule 12: Living locally and 20 minute neighbourhoods; Schedule 14: Education; Schedule 17: Play, recreation, sport Schedule 18: Health and safety; Schedule 19: Flood risk and water management; Schedule 20: Digital infrastructure; and cross boundary infrastructure capacity outside the Cairngorms National Park.
- Aberdeenshire Council, in their Quality homes topic paper (CNPA571), make an assumption that the Cairngorms National Park Authority will set a figure of 200 dwellings over 10 years as its housing land requirement for the Aberdeenshire part of the Cairngorms National Park Authority in its next local development plan. However, this figure is significantly higher than the evidenced need and the historic completion rate and is not considered to be achievable.
- The affordable housing need identified in the Housing Need and Demand Assessment (CNPA567) is 29 dwellings, however the Housing Need and Demand Assessment's estimate of need is for the whole Rural Aberdeenshire housing market area, over which it is recognised that need varies significantly. An appropriate affordable housing requirement can be set on a settlement by settlement basis.



Conclusions relating to affordable housing need across the Cairngorms National Park and how to meet the very high levels of need is set out on page 151.

- It is proposed that the indicative local housing requirement for the Aberdeenshire Council part of the Cairngorms National Park should be based on the Scottish Government's Minimum all tenure housing land requirement. This would achieve both the identified affordable housing need and market housing demand for 2027 – 2036.

## **Moray Council**

### **Moray Housing Need and Demand Assessment 2023**

The Moray Housing Need and Demand Assessment Final Report (CNPA580) was published in December 2023. The Scottish Centre for Housing Market Analysis advised in December 2023 that the process and methodology used to produce the Moray Housing Needs and Demand Assessment are robust and credible.

The Housing Needs and Demand Assessment concludes that the housing market area boundaries used in the 2017 Housing Needs and Demand Assessment remain robust. Moray is considered to be a self contained area, with a functional housing market area, within which six housing market sub areas exist, including the Cairngorms housing market sub area.

However, the Cairngorms housing market sub area is notably different to the five other housing market sub areas, in that it is dominated by inward migration. An analysis<sup>26</sup> of the origins of households purchasing residential properties in the Cairngorms housing market sub area reveals that:

- Just 20% of property purchasers in the Cairngorms housing market sub area originate from the Cairngorms area therefore the sub area cannot be regarded in any way as a self contained housing market.
- The remaining housing market sub areas in Moray exert limited influence on the Cairngorms housing market sub area with just 14% of all transactions arising from purchasers in the wider Moray area.
- Elsewhere, the Highland Council area has some influence on the operation of the Cairngorms housing market sub area, with 11% of purchasers originating from this area.
- The Cairngorms National Park is most influenced by a wider national and internal market with substantial (56% of purchasers) inward migration from across Scotland, the United Kingdom and beyond.

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<sup>26</sup> Page 21 of the Moray Housing Need and Demand Assessment.



The Housing Needs and Demand Assessment models three scenarios to provide an upper and lower range of housing estimates for the period up to 2042 – the principal scenario, high migration scenario and Moray growth scenario. The Moray growth scenario responds to the ambitious Moray Growth Deal, which seeks to drive migration to the area as a result of investment in jobs and infrastructure. This scenario applies a 0.25% uplift to the principal projection for households over the 20 year projection period (2023 and 2042).

These scenarios result in a housing estimate range for the Cairngorms housing market sub area of between 44 and 59 dwellings between 2022 and 2041 (section 5.7, page 58); 29-33 of which are estimated to be required by 2026.

By tenure, across the Moray area, the Housing Need and Demand Assessment (page 53) estimates that:

- 53% – 58% of housing estimates should be met by social housing.
- 10% – 11% of housing estimates should be met by below market housing.
- 15% – 17% should be met by market rented housing.
- 17% – 19% should be met by market housing.

Under the growth scenario, the all tenure housing estimate is 3,568 dwellings between 2022 – 2026, falling to 1,080 between 2027 – 2031, 1,084 between 2032 – 2036 and 998 between 2037 and 2041. The 2022 – 2026 total includes 2,160 dwellings to meet the identified existing need. These figures are set out in Table 43.

The Housing Need and Demand Assessment calculation shows that, in the Cairngorms housing market sub area, over the next 20 years, 59 dwellings are needed to meet household growth. This includes 21 dwellings to meet existing housing need. 42% of households will require social housing to meet their housing need and a further 14% below market housing, meaning that 56% of housing needs to be in the form of affordable homes. The figures for the sub areas are not broken down into five year periods. The available figures are set out in Table 44. The figures are approximately 1% of the totals for Moray housing market area.

Table 43 Additional housing units needed, for each five year band, in the Moray housing market area for scenario 3 (growth 0.25%) (Moray Council, Housing Needs and Demand Assessment, 2023) (CNPA580).

Moray housing market area Scenario 3 (growth 0.25%)	2022 – 2026	2027 – 2031	2032 – 2036	2037 – 2041
Newly forming households	1,408	1,080	1,084	998



Moray housing market area Scenario 3 (growth 0.25%)	2022 – 2026	2027 – 2031	2032 – 2036	2037 – 2041
Existing Need	2,160	0	0	0
Total	3,568	1,080	1,084	998

Table 44 Additional housing units needed, for the twenty-year band by tenure, in the Cairngorms housing market sub-area, for scenario 3 (Moray Council, Housing Needs and Demand Assessment, 2023) (CNPA580).

Cairngorms housing market sub area Scenario 3 (growth 0.25%)	2022 – 2041	
<b>All tenure housing figure</b>	<b>59</b>	
<b>Market per year</b>	<b>26</b>	<b>44%</b>
- Private rented stock	10	17%
- Owner occupied	16	27%
<b>Affordable per year</b>	<b>33</b>	<b>56%</b>
- <b>Social rent</b>	25	42%
Newly forming households	4	
Existing Need	21	
- <b>Below market</b>	8	14%

Table 45 Ten year scenario 3 (growth 0.25%) need and demand figures for the Cairngorms housing market sub area adjusted to align with the Cairngorms National Park's timescales for the next local development plan (Moray Council, Housing Needs and Demand Assessment 2020) (CNPA580).

Housing Need and Demand Assessment 2023 - 2028 Cairngorms housing market sub-area Growth scenario	Local development plan period 2027 – 2036	
All tenure housing figure	30	
Market housing figure	13	44%
Affordable housing figure	17	56%

### Moray Council Local Housing Strategy 2019 – 2024

Moray's current Local Housing Strategy (CNPA581) was published in 2019 covering until 2024. It is based on the Moray Housing Need and Demand Assessment 2017. It targeted 10 affordable homes between 2019 and 2024. Work on the next Strategy is ongoing with consultation on the draft taking place between 18 September to 14 November 2025.



### **Moray Council Strategic Housing Investment Plan 2024 / 2025 – 2028 / 2029**

Published in November 2023, the investment plan (CNPA582), sets out the levels of affordable housing over the last five years. There were no affordable housing completions in the Cairngorms housing market area. However, 14 were completed on the former school site in Tomintoul after publication. The affordable housing supply programme 2024 / 2025 – 2028 / 2029 includes no sites in the Cairngorms housing market sub area.

### **Moray Council Evidence Report – Moray Local Development Plan 2027**

The evidence report (CNPA1292), published in April 2024, explains that the local housing land requirement is based on the Housing Need and Demand Assessment growth scenario. The growth scenario responds to Moray's ambitious growth deal. This means that Moray's housing supply target for the 15 years from 2022 and 2037 is 5,732 dwellings. Taking account of housing completions in 2022 and 2023, the evidence report sets out that the Housing Land Requirement is 4,850 dwellings. This evidence report assumes that 1% of this housing supply target will be delivered by the Cairngorms National Park Authority. This proportion is in line with the Housing Need and Demand Assessment (CNPA580). It equates to a housing land requirement of 48.5 dwellings between 2024 and 2037. This equates to 3.7 dwellings per year and 37 dwellings over the 10 year period of the Cairngorms National Park local development plan.

Note that the Moray evidence report does not take account of the Cairngorms housing market sub area's specific completions or existing need and is a higher figure than the growth scenario figure for the Cairngorms housing market sub area in the Housing Need and Demand Assessment – which is 59 dwellings over 20 years, 44.25 over 15 years and 29.5 over 10 years.

The evidence report highlights that the Housing Need and Demand Assessment estimates that 53% – 58% of housing should be met by social housing, and a further 10% – 11% should be met by below market housing. However, it is proposed to continue with the current policy requirement for sites of four or more dwellings to provide 25% affordable units.

### **Moray Council summary and indicative housing land requirement**

Table 46 summarises the housing evidence relevant to the local development plan period 2026 – 2037 for the Moray Council part of the Cairngorms National Park to derive an indicative housing land requirement. The key points are that:

- In their methodology (CNPA546), the Scottish Government identifies a default 10 year figure 10 year housing need figure for Moray Council of 27 dwellings (4% of the



total for Cairngorms National Park). Taking account of the 30% flexibility allowance and rounding to arrive at 850 dwellings, the Moray Council part of the 10 year all tenure minimum local housing requirement is 35 dwellings.

Since the publication of the Minimum all tenure housing land requirement, the following new evidence has been published:

- The Housing Need and Demand Assessment's (CNPA580) growth scenario estimates a 10 year all tenure housing need of 29.5 (rounded to 30) dwellings between 2027 – 2036. The affordable housing need represents around 56% of the total, totalling 17 affordable houses over 10 years.
- The Moray Council evidence report (CNPA1292) identifies a local housing requirement for 2024 – 2037 of 48.5 dwellings (1% of the total) for the Cairngorms housing market sub area. This equates to 37 dwellings over the 10 year period of the Cairngorms National Park local development plan. However, Moray Council's requirement is based on an affordable housing policy of 25% (Moray Council's current and proposed requirement). This would deliver nine affordable homes.
- Completions in the Moray Council part of the National Park averaged 2.3 dwellings per year between 2013 and 2023 (see Table 17). 14 affordable houses were built in Tomintoul in 2023. This accounted for 71% of the completions between 2020 and 2023.
- The housing land audit 2024 – 2025 (CNPA583) indicates that there are eight dwellings in the established housing land supply up to 2031. These are the two allocated sites in Tomintoul (see Table 21).
- This new evidence published since the Scottish Government's minimum housing land requirement was published indicates that the identified 10 year all tenure minimum housing land requirement figure for Moray Council of 35 dwellings is ambitious and higher than the evidenced need. There is sufficient buffer, above evidenced need, within this figure to respond to the pressures put on the housing market by the high level of second homes and short term lets outlined in this schedule.
- The figure of 35 dwellings is considered achievable, based on existing completion rates, the established housing land supply and the infrastructure first evidence set out in Schedule 9: Energy; Schedule 10: Zero waste; Schedule 11: Sustainable transport; Schedule 12: Living locally and 20 minute neighbourhoods; Schedule 14: Education; Schedule 17: Play, recreation, sport Schedule 18: Health and safety; Schedule 19: Flood risk and water management; Schedule 20: Digital infrastructure; and cross boundary infrastructure capacity outside the Cairngorms National Park.
- The identified affordable housing need in the Housing Need and Demand Assessment is 17 affordable dwellings. An appropriate affordable housing requirement should be set on a settlement by settlement basis. Conclusions relating



to affordable housing need across the Cairngorms National Park and how to meet the very high levels of need is set out on page 151.

- It is proposed that the indicative local housing requirement should be based on the Scottish government's minimum all tenure housing land requirement. This would achieve both the identified affordable housing need and market housing demand for 2027 – 2036.

Table 46 Summary of the housing evidence figures<sup>27</sup> relevant to the Moray Council part of the Cairngorms National Park, for the period of the local development plan 2027 – 2036. (Moray Council and Scottish Government) (CNPA545, CNPA546, CNPA580).

All tenure	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Government minimum all tenure housing land requirement (derived figure for Moray Council)	3	3	3	3	3	3	3	3	3	3	35
Housing Need and Demand Assessment 2023 (Cairngorms sub housing market area)	3	3	3	3	3	3	3	3	3	3	30

Market Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2023 (Cairngorms sub housing market area)	1	1	1	1	1	1	1	1	1	1	13

Affordable Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2023 (Cairngorms sub housing market area)	2	2	2	2	2	2	2	2	2	2	17
75% of the Government minimum all tenure housing	3	3	3	3	3	3	3	3	3	3	26

<sup>27</sup> All figures rounded to nearest whole number.



land requirement (derived figure for Moray Council) <sup>28</sup>																			
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## Perth and Kinross Council

### Perth and Kinross Housing Market Partnership Housing Need and Demand Assessment Final Report, November 2022

Perth and Kinross Council is one of four housing market partners who have come together to produce the Tayside Housing Need and Demand Assessment (CNPA586). It was published in November 2022 and confirmed as robust and credible by the Centre for Housing Market Analysis on 9 May 2023.

The Perth and Kinross Council area includes six housing market areas, of which parts of the Highland Perthshire and Eastern (Strathmore and Glens) housing market areas are within the National Park.

Three baseline scenarios have been produced – ‘Principal’, ‘High Migration’ and ‘High Migration + Perth and Kinross Growth’. The ‘high migration’ scenario assumes 7% growth in Perth and Kinross over the next 25 years, while the ‘high migration plus Perth and Kinross growth’ scenario anticipates a higher rate of household migration of 13% (0.5% per annum) over the next 15 years – based on higher productivity rates than the rest of the region and likely job growth, which would enhance migration beyond the trend based data.

However, in the Highland and Eastern housing market areas, this growth would be driven by the settlements of Pitlochry, Aberfeldy and Dunkeld / Birnam (Highland Perthshire) and Blairgowrie, Alyth and Coupar Angus (Eastern). Hence, the majority (if not all) of the growth in Perth and Kinross will be outwith the Cairngorms National Park.

The settlements of Blair Athol and Calvine are within the Highland Perthshire housing market area. Highland Perthshire has approximately 8% of the population of Perth and Kinross, but the population of Highland Perthshire which is also in the Cairngorms National Park is also only around 8%. This means that the population of Perth and Kinross which is in the National Park is around 0.06% of the population.

<sup>28</sup> Indicates the amount of affordable housing which would be delivered if the Cairngorms National Park Partnership Plan 2022 – 2027 target of 75% of all is applied to the Government’s minimum all-tenure housing land requirement.



The Housing Needs and Demand Assessment’s growth scenario estimates a housing requirement over the 20 year period 2021 – 2040 of 10,205 dwellings. This is set out in Table 47. In the first five years, an existing housing need of 1,328 dwellings is included. This creates a tenure split of 47% market housing and 53% affordable housing. The affordable housing need is then less (because the existing need has been satisfied), in subsequent five year periods to 33%, then 30%, then 28%. The five year period estimates also show that the rate of household growth reduces over the 20 year period.

Table 47 Additional housing units needed, for each five year band, in the Perthshire and Kinross housing market areas for scenario 3 (growth) (Perth and Kinross Council, Housing Needs and Demand Assessment, 2022) (CNPA586).

Perth and Kinross housing market areas	2021 – 2025		2026 – 2030		2031 – 2035		2036 – 2040	
<b>Scenario 3 (growth)</b>								
<b>All tenure housing figure</b>	<b>4,742</b>		<b>2,708</b>		<b>2,279</b>		<b>867</b>	
<b>Market per year</b>	<b>2,221</b>	<b>47%</b>	<b>1,826</b>	<b>67%</b>	<b>1,600</b>	<b>70%</b>	<b>627</b>	<b>72%</b>
- Private rented stock	1,129		920	34%	813	36%	314	36%
- Owner occupied	1,092		906	33%	787	34%	313	36%
<b>Affordable per year<sup>29</sup></b>	<b>2,520</b>	<b>53%</b>	<b>882</b>	<b>33%</b>	<b>679</b>	<b>30%</b>	<b>240</b>	<b>28%</b>
- Social rent	1,882	40%	393	15%	306	14%	107	12%
- Below market	639	13%	489	18%	373	16%	133	15%

The extrapolated figures for the Cairngorms National Park part (0.06% of the overall population) of the Perth and Kinross housing market areas are set out in Table 48 for the local development plan period (2027 – 2036). Note that this therefore doesn’t include the higher affordable housing need in years 2021 – 2025.

Table 48 Ten year scenario 3 (growth) need and demand figures for the Cairngorms National Park part (based on population) of the Perth and Kinross housing market areas, adjusted to align with the Cairngorms National Park’s timescales for the next local development plan (Perth and Kinross Council, Housing Needs and Demand Assessment 2022) (CNPA586).

<sup>29</sup> Includes existing need for 1,328 dwellings in 2021 – 2025.



Housing Need and Demand Assessment 2022 Perth and Kinross housing market sub area Growth scenario (population based proportion – 0.06%)	Local development plan period 2027 – 2036	
All tenure housing figure	30.3	
Market housing figure	20.9	69%
Affordable housing figure	9.4	31%

### Perth and Kinross Local Housing Strategy 2022 – 2027

The local housing strategy (CNPA587) spans a five year period from 2022 up to 2027. It was formally published in March 2023 (due to admin delays) but has been in place since 2022 and covers all work up to March 2027.

The strategy favours the Housing Need and Demand Assessment’s (CNPA586) growth scenario. It sets an annual Housing Supply Target of 654 dwellings per year, with a target for 32% affordable housing (210 dwellings). This is a 40% increase on the affordable housing target in the Local Housing Strategy 2016 – 2021 and meets the Council’s key priorities to provide more affordable homes, in the right place at the right cost. Of the 210 affordable homes, 131 of the affordable houses would be social rent and 79 affordable houses below market.

The Local Housing Strategy advises that further analysis and research will be undertaken to disaggregate the Housing Supply Target by housing market sub area.

The Local Housing Strategy’s Appendix sets out the rationale for the Housing Supply Target. It explains that the affordable housing figures derived by the Housing Need and Assessment’s growth scenario for the first five year period are not achievable given the limited availability of Scottish Government funding and the land supply needed. It proposes to deliver the affordable housing component over a 20 year period. This includes addressing the backlog of existing need over the full 20 year period rather than the first five years as assumed in the Housing Need and Demand Assessment.

The overall Housing Supply Target for the five years to 2027 and compared to Housing Need and Demand Assessment estimates, are set out in Table 49 for the Perth and Kinross housing market area and the proportioned amounts for the Cairngorms National Park part of the market area set out in Table 50.



Table 49 Annualised housing supply target derivation for Perth and Kinross Housing Market Areas (Perth and Kinross Council, Local Housing Strategy 2022 – 2027 Appendix: Housing Supply Targets 2022+) (CNPA587).

Perth and Kinross housing market areas	Housing Need and Demand (2021 – 2025 five-year period) (annualised)		Housing Need and Demand (2021 – 2040 twenty-year period) (annualised)		Housing Supply Target (2022 – 2027) (annualised)	
<b>All tenure housing</b>	<b>948</b>		<b>510</b>		<b>654</b>	
<b>Market housing</b>	<b>444</b>	<b>47%</b>	300	59%	<b>444</b>	<b>68%</b>
Owner occupied	226				218	33%
Private rent	218				226	35%
<b>Affordable housing</b>	<b>504</b>	<b>53%</b>	<b>210</b>	<b>41%</b>	<b>210</b>	<b>32%</b>
Social rent			131		131	20%
Below market			79		79	12%

Table 50 Annual housing supply target 2022 – 2027 for the Cairngorms National Park part of the Perth and Kinross Housing Market Areas (Perth and Kinross Council, Local Housing Strategy 2022 – 2027 Appendix: Housing Supply Targets 2022+) (CNPA587).

Cairngorms National Park derived housing supply target (population based proportion – 0.06%)	Housing Need and Demand (2021 – 2025 five year period) (annualised)		Housing Need and Demand (2021 – 2040 20 year period) (annualised)		Housing Supply Target (2022 – 2027) (annualised)	
<b>All tenure housing</b>	<b>6.2</b>		<b>3.3</b>		<b>4.3</b>	
<b>Market housing</b>	<b>2.9</b>	<b>47%</b>	1.9	58%	<b>2.9</b>	<b>68%</b>
Owner occupied	1.4				1.4	33%
Private rent	1.5				1.5	35%
<b>Affordable housing</b>	<b>3.3</b>	<b>53%</b>	<b>1.4</b>	<b>42%</b>	<b>1.4</b>	<b>32%</b>
Social rent			0.9		0.9	20%
Below market			0.5		0.5	12%



### **Perth and Kinross Council Strategic Housing Investment Plan 2025 / 2026 – 2029 / 2030**

The strategic housing investment plan (CNPA588) aligns with the outcomes set out in the Local Housing Strategy 2022 – 2027. The plan's programme seeks to deliver 1,152 dwellings (230 dwellings per year) on defined project sites over the five years of the plan. This is above the Local Housing Strategy target of 210 new affordable homes. Delivery is subject to restoration of funding through the Scottish Government's Resource Planning Assumption for Perth and Kinross to pre-cut levels. There are no sites within Cairngorms National Park.

### **Perth and Kinross Local Development Plan 3 2027 – Evidence Report Topic Paper No. 020: Homes, July 2024**

The paper (CNPA1293) summarises the key information about housing in Perth and Kinross. It concludes that the local issues identified were already considered in the identification of the Scottish Government's minimum all tenure housing land requirement (8,500 dwellings over 10 years) and that there is no individual factor or clear piece of evidence which justifies increasing indicative housing land requirement beyond this figure.

Nevertheless, the topic paper proposes two options – option one which proposes no increase on the minimum all tenure housing land requirement and option two which increases the housing land requirement to 10,000 dwellings. The topic paper states that this is an arbitrary figure for which there is no specific evidence. However, it reflects the higher figure set by the previous Strategic Development Plan for Perth and Kinross and which was previously considered a realistic option, albeit that the rate of housing completions required (1,000 dwellings per year) was never achieved.

There is no reference to the Cairngorms National Park in the evidence report.

### **Housing Needs Survey Report for Blair Atholl and Struan Community Council (November 2024)**

This survey and report (CNPA207), by the Communities Housing Trust, offers a snapshot of housing need at the time of publication. 57 resident households responded as well as 17 people who did not live in the area but wanted to. The results show that there is a need for affordable homes for existing residents, home leavers and businesses. The report concludes that a community led project could be considered in the locality, where communities have more control over who will be offered a home.



Based on the evidence provided by respondents, the report recommends the provision of up to 20 homes in the Blair Atholl and Struan Community Council area. It also advises that, subject to funding conditions, there may also be an option, where open market housing can be provided, of reinvesting the surplus from these sales as a cross subsidy to help finance affordable housing developments – either as part of the same project or elsewhere.

A broad range of housing tenures are recommended, with a mix of two and three bedroom low cost rental and purchasing options, to help to encourage more collaborative partnership working and inward investment opportunities. It advises that this in turn will help to support the existing local economies, services, infrastructure and businesses to be more sustainable, thereby enhancing the opportunities for growth.

### **Perth and Kinross Council summary and indicative housing land requirement**

Table 51 summarises the housing evidence relevant to the local development plan period 2026 – 2037 for the Perth and Kinross Council part of the Cairngorms National Park in order to derive an indicative housing land requirement. The key points are that:

- In their methodology, the Scottish Government does not identify a default 10 year figure 10 year housing need figure for the Perth and Kinross Council. Part of Cairngorms National Park. However, the evidence below indicates that there is a need and demand for new housing.

Since the publication of the Minimum all tenure housing land requirement, the following new evidence has been published:

- The Housing Need and Demand Assessment's (CNPA586) growth scenario estimates a 10 year all tenure housing need of 30.3 (rounded to 30) dwellings between 2027 – 2036, 31% of which 9.4 dwellings (rounded to 9) is required to be affordable housing Note that this does not include the first five year period (2021 – 2025) of the Housing Need and Demand Assessment which includes the identified existing affordable housing need. For this period, 53% of all tenure housing needs to be in the form of affordable housing.
- The Local Housing Strategy 2022 – 2027 (CNPA587) sets a housing supply target up to 2027, which does not overlap with the next Cairngorms National Park local development plan 10 year period.
- Completions in the Perth and Kinross part of the National Park averaged 1.7 dwellings per year between 2013 and 2023 (see Table 17). Eight affordable dwellings have been built on a site in Blair Atholl. This amounted to 80% of the dwellings completed between 2020 and 2023.



- The Housing Needs Survey Report for Blair Atholl and Struan Community Council (CNPA207) indicates a current need for up to 20 dwellings and a mix of low cost home ownership, rental and open market homes.
- The housing land audit 2023 (CNPA589) indicates that there are 28 dwellings in the established housing land supply up to 2030 (see Table 21). This includes part of the sites identified in Blair Atholl and Calvine in the Cairngorms National Park Local Development Plan 2021 (CNPA016).
- The affordable housing need identified in the Housing Need and Demand Assessment (CNPA589) is nine dwellings. An appropriate affordable housing requirement should be set on a settlement by settlement basis. Conclusions relating to affordable housing need across the Cairngorms National Park and how to meet the very high levels of need is set out on page 151.
- This new evidence published since the Scottish Government’s minimum housing land requirement was published indicates that an all tenure housing land requirement figure of 39 dwellings for the Perth and Kinross Council part of the Cairngorms National Park would achieve both the identified affordable housing need and market housing demand for 2027 – 2036. This has been calculated by adding 30% flexibility to the Housing Need and Demand Assessment 10 year all tenure housing need estimate of 30.3 (rounded to 30). There is sufficient buffer, above evidenced need, within this figure to respond to the pressures put on the housing market by the high level of second homes and short term lets outlined in this schedule.
- The figure of 39 dwellings is considered achievable, based on existing completion rates, the established housing land supply and the infrastructure first evidence set out in Schedule 9: Energy; Schedule 10: Zero waste; Schedule 11: Sustainable transport; Schedule 12: Living locally and 20 minute neighbourhoods; Schedule 14: Education; Schedule 17: Play, recreation, sport Schedule 18: Health and safety; Schedule 19: Flood risk and water management; Schedule 20: Digital infrastructure; and cross boundary infrastructure capacity outside the Cairngorms National Park.

Table 51 Summary of the housing evidence figures<sup>30</sup> relevant to the Perth and Kinross Council part of the Cairngorms National Park, for the period of the local development plan 2027 – 2036. (Perth and Kinross Council and Scottish Government) (CNPA586).

All tenure	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2021 (0.06% of	4	4	4	4	3	3	3	3	3	1	30

<sup>30</sup> All figures rounded to nearest whole number.



All tenure	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
the Perth and Kinross housing market areas)											

Market Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2021 (0.06% of the Perth and Kinross housing market areas)	2	2	2	2	2	2	2	2	2	1	21

Affordable Housing	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Housing Need and Demand Assessment 2021 (0.06% of the Perth and Kinross housing market areas)	1	1	1	1	1	1	1	1	1	0	9

## Angus Council

Angus Council is one of four housing market partners who have come together to produce the Tayside Housing Need and Demand Assessment (CNPA577). It was published in November 2022. There are four market areas. The West Angus Housing Market Area includes the settlements of Forfar, Kirriemuir and Letham and stretches north to include the Angus Glens (Glen Esk, Glen Clova, Glen Prosen and Glen Isla). There are only 42 dwellings in the Angus area of the National Park, which lead the Council's housing market analysis to conclude that house buyers from the Cairngorms National Park have no influence on the operation of the West Angus Housing Market Area (which contains the settlements of Kirriemuir and Forfar), or any other housing market areas in Angus.

No quantitative conclusions relating to the National Park can be drawn from the housing need and demand assessment, therefore in this area the Park Authority must take into account any other information available to determine the needed land supply. Given the extremely small size of the population and the number of households within the area, it is clear that a quantitative analysis of need is not possible.



In addition, the area's relative geographical isolation to the rest of the National Park, means that this population is unlikely to generate any demonstrable housing need and demand that needs to be met at a strategic level. Therefore, a policy based approach to housing provision is considered to be the most robust option within the area, with no overall level of housing set and applications considered on a case by case basis. Under such circumstances, the onus would be on the applicant to demonstrate need, just as would be the case in any other out of settlement locations within the National Park. This area can therefore be excluded from consideration in the overall assessment of housing need and demand.

## **Other sources of housing need and demand information**

### **Cairngorms National Park residents and workers survey 2024 – 2025**

In addition to the local authority data, evidence of need can also be drawn from the Cairngorms National Park resident and worker survey 2024 – 2025 (CNPA538). While this data cannot be used to quantify need in terms of the housing land requirement, it does highlight the experiences, including barriers to finding affordable housing, of those living and working in the National Park.

The research was conducted by M·E·L Research using their online survey platform. The survey was open from 17 July 2024 until 31 January 2025. In total, 1,294 responses were received from residents living within the National Park (either as their primary residence, or one of two or more residences, excluding holiday homes), and 63 were received from those who live outside of the National Park. The profile of respondents was broadly similar to that taken from the 2022 Census in terms of area lived in, age, ethnicity, sex and gender, and health conditions and caring responsibilities.

Relevant findings are summarised below:

- 60% of residents surveyed reported that they had found it difficult to find an affordable place to live in the Cairngorms National Park, with 28% saying that it was very hard. A higher percentage of younger resident sub groups reported finding it difficult, as follows (percentage who found it difficult in brackets): those aged 16 to 34 years (77%), 35 to 44 years (78%) and 45 to 54 years (71%), compared to those aged 55 to 64 year (55%) and 65 years and over (42%). By gender, a greater percentage of female residents found it difficult (64%) compared to male (54%) residents.
- Among those living outside the National Park, but working within it, 50% cited the difficulty of finding affordable housing as a reason (although note that this was a



small sample size and that 25% stated that they hadn't looked or were not interested in living within the National Park).

- One third (32%) of residents surveyed, indicated that they would like to move home in the next few years ('in next two years' and 'in next three plus years'). This compares to 21% of residents across Scotland (as found in the Scottish household survey 2023).
- 63% of residents who would like to move identified low supply of housing ('not available or limited supply where I want or have to live') as a barrier preventing them from moving into their most preferred accommodation. This compares with only 12% who stated this was the case in the Scottish household survey 2023. In addition, only 18% of National Park residents identified being unable to raise a sufficient deposit as a barrier, compared to 43% in the Scottish household survey. Both these answers suggest that low supply is the primary barrier within the Cairngorms National Park.

### **Existing Housing Need in Scotland, Homes for Scotland, 2024**

This report (CNPA552), published in January 2024, commissioned by Homes for Scotland and written by The Diffley Partnership and Rettie and Co aims to assist planning authorities with the evidence gathering process. It seeks to understand housing need across Scotland, as well as at individual local authority level where possible. It uses a broader definition of existing household need than that currently used by default within the Housing Need and Demand Assessment (that relate to homeless households in temporary accommodation; and overcrowded households that include at least one concealed family).

A survey of 13,690 Scottish households was conducted which found that 28% of Scottish households currently have some form of housing need. A significant proportion can afford market housing, but, when combined with secondary data analysis, the report estimates that 330,000 households require affordable housing (that is to say are in net household need and represent a backlog that need an affordable housing solution). This is significantly higher than the figure of just under 31,000 (based on those living in temporary accommodation or in concealed and overcrowded households) captured by the Scottish Government definitions and the report states that their survey demonstrates that levels of existing housing need are more complex and much higher than is currently accounted for through the Housing Need and Demand Assessment tool.

The report does not contain any information directly relating to the Cairngorms National Park. Furthermore, as set out in Stirling Council's Evidence Report, under Topic Paper 10, pages 104 to 107, there are multiple failings in Homes for Scotland's evidence. The



Reporter assigned to the Gatecheck on Stirling Council's evidence report also concluded (CNPA599) that Homes for Scotland's evidence 'cannot be taken to override other evidence or assume additional weight to fill the gap left by [Stirling Council's] expired housing need and demand assessment'. Therefore, the Park Authority does not consider that the Proposed Plan can draw any implications from the Homes for Scotland Report referenced in this topic paper.

## **Implications of housing need and demand: Local housing land requirement**

The Cairngorms National Park is only covered by two housing market areas that may be regarded as contiguous with its boundary, which are Badenoch and Strathspey housing market area in Highland Council and Cairngorms housing market area in Moray Council. Four other housing market areas, namely Aberdeenshire's Rural Housing Market Area, Perth and Kinross' Highland Housing Market Area and Eastern (Strathmore and the Glens) Housing Market Areas and Angus' West Housing Market Area, include areas of the National Park, but their functional market areas are mostly located in settlements outwith the National Park's boundary (Figure 37).

Evidence made available since the publication of the Government's Minimum all tenure housing land requirement consists of each constituent authority's housing need and demand assessments, local housing strategies and housing supply targets.

In broad terms, the housing supply targets of local housing strategies' increase the relevant housing need and demand assessment figures to take account of planned economic growth, affordable housing pressures and the impact of second homes of housing stock. However, except for Aberdeenshire Council, the housing supply targets cover a five year period and do not provide housing figures for the 10 years of the next Cairngorms National Park Local Development Plan.

Table 52 brings together and summarises the assessment of housing need and demand within these areas as pertains to the Cairngorms National Park, according to the following sources of evidence:

- Each constituent local authority's Housing Need and Demand Assessment.
- Housing completions over the last ten years.
- The adopted Local Development Plan 2021 (CNPA016) housing land requirement for the 10 year period from 2020 to 2029.
- The ten year all tenure housing land requirements set by the Scottish Government's Minimum All Tenure Housing Land Requirement.



The table highlights that the Scottish Government's Minimum All Tenure Housing Land Requirement for the Cairngorms National Park (850 dwellings) is higher than the evidenced total need and demand for housing as set out in the local housing authorities' housing need and demand assessments (486 dwellings).

When benchmarked against completions over the past 10 years (845 dwellings – see page 83) and the Cairngorms National Park's planned for growth to 2029 (819 Dwellings – see page 32), as set out within the adopted Cairngorms National Park Local Development Plan 2021 (CNPA016), the Government's Minimum all tenure housing land requirement is achievable and deliverable.

The Minimum all tenure housing land requirement figure of 850 dwellings is considered achievable, when benchmarked against the infrastructure first evidence set out in Schedule 9: Energy; Schedule 10: Zero waste; Schedule 11: Sustainable transport; Schedule 12: Living locally and 20 minute neighbourhoods; Schedule 14: Education; Schedule 17: Play, recreation, sport Schedule 18: Health and safety; Schedule 19: Flood risk and water management; Schedule 20: Digital infrastructure; and cross boundary infrastructure capacity outside the Cairngorms National Park.

Assessing the figures at a constituent local authority level, the 'default 10 year figures' for each local authority stated in Annex J of the Scottish Government minimum all tenure housing land requirement methodology paper are higher than the evidenced need and demand figures, with the exceptions of Moray Council and Perth and Kinross Council. In Moray Council, the evidenced need is 30 dwellings, and the default 10 year figure is 27 dwellings.

For Perth and Kinross Council, the Scottish Government's minimum all tenure housing land requirement methodology paper advised that the data zones involved are mainly on the Council side of the border and no figure was derived for the Cairngorms National Park part. However, this part of the National Park includes the intermediate settlement of Blair Atholl and it is important that a local housing land requirement is set for this area. The Housing Need and Demand Assessment 2022 indicates a need for 30 dwellings. With a 30% flexibility allowance, this figure would be 39 dwellings.



Table 52 Summary of alternative all tenure housing figures for the Cairngorms National Park (Scottish Government, local authorities' assessments) (CNPA545, CNPA126, CNPA567, CNPA577, CNPA580, CNPA586).

Source of information	The Highland Council	Aberdeenshire Council	Angus Council	Moray Council	Perth and Kinross Council	Cairngorms National Park Authority Total
Scottish Government 10 year default figures <sup>31</sup>	514	135	0	27	0	676
Housing Need and Demand Assessments <sup>32</sup>	366	62	0	30	30	488
Local Development Plan 2021 <sup>33</sup> (2020 – 2029 figures)	580	137	0	54	48	819
Completions 2013 – 2023	688	117	0	23	17	845
Minimum All tenure housing land requirement <sup>34</sup>	646	170	0	34	0	850

This means that there is no new evidence, since the Scottish Government's Minimum all tenure housing land requirement was published, that indicates that the Cairngorms National Park Authority should set a higher local housing requirement and shows that the government derived figure is already ambitious, particularly given the National

<sup>31</sup> Scottish Government 10 year default figure as published in Annex J of the Scottish Government minimum all tenure housing land requirement methodology, 2021 (CNPA545).

<sup>32</sup> Figures derived from each constituent authority's Housing Need and Demand Assessment, aligned to the new local development plan 10 year period of 2027 - 2037 and based on their preferred projection scenario.

<sup>33</sup> Housing Land Requirement figures, based on a generosity level of 10% above the housing supply target.

<sup>34</sup> Scottish Government minimum all tenure housing land requirement, broken down into market areas based on the proportional distribution set out in Annex J of the Method Paper, February 2021.



Park's statutory aims (as amended by the by the Natural Environment Scotland (Scotland) Bill (CNPA634) once enacted)<sup>35</sup> 'to conserve and enhance the area's natural and cultural heritage'<sup>36</sup>, 'to promote sustainable management and use of the area's natural resources'<sup>37</sup>, and 'to promote public understanding and enjoyment of the area's natural and cultural heritage'<sup>38</sup>.

The environmental implications for the Proposed Plan show that there is a need to make the most efficient use of available development land. This is because there is a need to look beyond the next plan period to ensure that needs can be met for future generations, an approach, which is consistent with the sustainable development principles within National Planning Framework 4 (CNPA008) and the United Nations Sustainable Development Goals (CNPA002). It also aligns with the pursuit of the National Park aims (CNPA004), including Section 9(6), which gives greater weight to the first aim where conflict between the aims arises. These are set out in the following schedules:

- Schedule 5: Natural heritage, which considers the implications of around half of the National Park's geography being covered by statutory protected sites.
- Schedule 6: Landscape, which considers the implications of the National Park's designation as a category V protected landscape and the Special Landscape Qualities for which it is designated.
- Schedule 19: Flood risk and water management, which considers the implication of flood risk on the spatial strategy.

An efficient use of land includes measures such as not allocating more land than necessary to meet need and discouraging low density development on allocated sites. For this reason, and when considering the evidence in this schedule, a housing target above the Minimum housing land requirement is not considered appropriate.

It is proposed that the indicative local housing requirement should be based on the Scottish government's minimum all tenure housing land requirement (850 dwellings), with a figure for Perth and Kinross Council area added, based on evidenced need. As set out in Table 53, this sets an indicative local housing land requirement of 889 dwellings, this is 4% (39 dwellings) higher than the Minimum all tenure housing land requirement.

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<sup>35</sup> See Schedule 1: Plan outcomes for an overview of the National Park aims and the statutory duties they bestow upon the Park Authority and other public sector partners.

<sup>36</sup> See Schedule 5: Natural heritage, Schedule 6: Landscape and Schedule 7: Historic and cultural heritage for information on the natural and cultural heritage assets within the National Park.

<sup>37</sup> See Schedule 8: Land use, soil and resources for information on the natural resources of the National Park.

<sup>38</sup> See Schedule 16: Blue and green infrastructure, Schedule 17: Play, recreation and sport and Schedule 23: Tourism for information on how the National Park is enjoyed by residents and visitors.



This would achieve both the identified affordable housing need and market housing demand for 2027 – 2036. There is sufficient buffer, above evidenced need, within this figure to respond to the pressures put on the housing market by the high level of second homes and short term lets outlined in this schedule. Therefore, these factors do not represent a justification to further increase the indicative local housing land requirement.

Table 53 Indicative Housing Land Requirement based on the government's minimum all tenure housing land requirement (CNPA545, CNPA546).

Local Authority	Local development plan period 2027 - 2036
Highland Council	645 dwellings
Aberdeenshire Council	170 dwellings
Moray Council	35 dwellings
Perth and Kinross Council	39 dwellings
<b>Total</b>	<b>889 dwellings</b>

It is noted that updated information may emerge in the course of preparation of the Proposed Plan, such as new population and household projections. Likewise further evidence will emerge in terms of site availability and viability. These will be given consideration in finalising the local housing land requirements for the Proposed Plan.

## **Affordable housing**

In addition to the local authority housing need and demand evidence, the following evidence is relevant.

### **Affordable Housing Need in Scotland Post 2026 (2025)**

This report (CNPA1290) is funded by Shelter Scotland, the Scottish Federation of Housing Associations and the Chartered Institute of Housing Scotland. It presents the findings from research on projected housing need in Scotland for 2026 – 2031 and is the third iteration of similar research conducted in 2015 and 2020.

In summary, it projects a need for 15,693 homes annually, which is a 50% increase in estimated need relative to the 2020 report. It advises that the drivers of need include increased homelessness, higher numbers of households inadequately housed in private tenures, recent spikes in rental inflation, persistent affordability pressure and a decline in the number of properties becoming vacant within the housing stock



The research estimates housing need at the national scale by estimating backlog need and newly arising need over the next five years. It finds that there is an increase in backlog need of 40.33% relative to the 2020 report and that 54.83% of newly forming households will be unable to afford the market. This is an increase of 3.7% on the 2020 report and relates primarily to rising homelessness.

It concludes that the level of need in Scotland underlines 'the need for urgent, significant and sustained investment in the Affordable Housing Supply Programme'. The report calculates multiple investment budgets based on different tenure and inflationary scenarios. Their central scenario is a 75% social rent, 25% mid market rent tenure split with a 5.5% inflation annually and requires a budget of £1.64 billion annually. By comparison, the 2025 to 2026 Affordable Housing Supply Programme budget is £807,745 million with at least 70% available for social rent (the report notes that 75.9% of affordable housing starts were social rented in 2022 / 2023 according to that year's Affordable Housing Supply Programme out turn report).

While the report estimates affordable housing need for five regional clusters, the estimates for these clusters directly relate to affordable housing need in the Cairngorms National Park. Nevertheless, the research highlights the growing affordable housing need across the whole of Scotland and the need for significant investment in affordable housing provision.

## **Viability**

To inform the local development plan's affordable housing requirements, the District Valuer Service have been commissioned to undertake assessments of viability of both delivering affordable housing on development sites and commuted sums.

## **Valuation Report for: Housing sites within Cairngorms National Park (October 2024)**

This report (CNPA594) explores the effect that increasing affordable housing contributions in the Cairngorms National Park to align with Objective C2 of the Cairngorms National Park Partnership Plan (CNPA010) would have on development viability.

The external valuer has carried out a valuation of six sites in the Cairngorms National Park. These vary in location and size and are all allocations that were proposed within the draft version of the current Local Development Plan. Only one of the sites has an



extant planning permission and so hypothetical development scenarios have been adopted.

Two individual residual valuations have been undertaken for each site. The first considers the current Local Development Plan (CNPA016) Policy 1.5 affordable housing requirement (either 25 or 45% of the total number of dwellings on the site) and the second valuation considers the requirement for 75% affordable housing.

Gross development values have been calculated for the market housing element of each development, by anticipating the sale prices of completed homes based on house sales in the locality of the site and further afield.

Development costs for the market housing element have then been calculated and this all cost total is deducted from the gross development value. The all cost total includes estimated build costs (based on Building Cost Information Service construction data); external works costs (20% of gross development value); contingencies (5%); professional fees (6%), agents and legal selling costs; land acquisition costs; finance costs (8.5%); and profit (20%).

A similar exercise was carried out for the affordable housing element, with gross development value calculated based on available grant funding and rental income. Development costs were calculated in a similar way as above, but with higher build costs and an assumed 6% profit level.

The residual values calculated under the current policy requirement for either 25% or 45% affordable housing support land values ranging from £92,021 to £252,000 an acre. This compares well with expected land values for medium sized sites which are in the region of £100,000 to £150,000 an acre. With a 75% affordable housing requirement, while developments would be viable (in that they are calculated to procure a return to a developer within the expected range), land values are diminished considerably, with land values calculated at around £40,000 to £50,000 an acre. The external valuer advises that, while the value would be higher than agricultural value, there is a 'high probability that landowners will be less likely to release land in the short term at least'.

The report does advise that, over time, there may be a correction in the market and sites will start being released, albeit for a lower return for the landowner. In conclusion, the external valuer advises that 75% affordable housing might be aspirational and 50% might be a more realistic figure that balances the requirement for affordable housing against landowner expectations.



## Valuation Report for Cairngorms National Park Authority: Affordable Housing Land / Commuted Sum Valuations (August 2024)

This report (CNPA595) updates previous valuation advice (November 2020) in relation to commuted sum payments, which is defined as a 'financial contribution to affordable housing'.

The same benchmark approach and assumptions have been made, with the valuation based on a single development plot, with services located close by, for the erection of a standard new build four apartment / three bedroom detached house of approximately 96 square meters (gross internal value) with private garden, off street parking, but no garage. This methodology is in line with the Royal Institute of Chartered Surveyors Professional Standard.

The external valuer has calculated a private housing plot value for each of the five constituent local authority areas within the National Park. The calculated value is considered to reflect the amount the housing association or local authority would have to pay over and above the affordable housing land value to obtain the alternative plot (Table 54). The commuted payments are slightly higher than the 2020 valuations.

Table 54 Benchmark commuted sum payment values as at 9 August 2024 (CNPA595).

Local authority area	Affordable housing plot value	Private housing plot value	Commuted payment
Aberdeenshire	£0	£35,000	£35,000
Angus	£0	18,250	18,250
Highland	£0	21,500	21,500
Moray	£0	£19,500	£19,500
Perth and Kinross	£0	£33,500	£33,500
Cairngorms National Park (average of five local authorities)	£0	£25,500	£25,500

In the adopted Local Development Plan (CNPA016), Policy 1.5 requires proposals for fewer than four market dwellings to make a contribution towards affordable housing. The level of contribution is set out in the Cairngorms National Park's Housing Supplementary Guidance (CNPA1294) and has been set at 10% of the full market cost of delivering affordable housing. The Proposed Plan will need to consider the thresholds for commuted sums as well as the value of the commuted sum to be levied.



## Implications for Affordable housing

The Cairngorms National Park Partnership Plan (CNPA010) targets that, by 2030, 75% of new housing is provided for social rental, mid market rental or other affordable categories that provide affordability in perpetuity. This includes using the next local development plan to identify further locations where more than 25% affordable housing is required.

The Cairngorms National Park Partnership Plan (CNPA010) provides strategic direction within the National Park. It acts as the Regional Spatial Strategy for the National Park, which is intended to address strategic development and issues and is the adopted national park plan.

The National Park (Scotland) Act 2000 (CNPA004), as amended by the Natural Environment (Scotland) Bill (CNPA634), states that public bodies and office holders, including the National Park Authority and local authorities must, in exercising functions so far as affecting a National Park, facilitate the implementation of the adopted national park plan<sup>39</sup>. This is supported in the Town and Country Planning (Scotland) Act 1997 (CNPA003) which states that in the exercise, with respect to any land in a National Park, of any power under the planning acts, special attention shall be paid to the desirability of exercising the power consistently with the adopted national park plan. More specifically, Scottish Government's local development planning guidance (paragraph 149) (CNPA009) states that local development plans for National Parks should look to align with the adopted national park plan. The Partnership Plan therefore provides the strategic context for the local development plan. For further information see Schedule 1: Plan outcomes.

The Cairngorms National Park Partnership Plan's target is an overall target and not an anticipated local development plan policy requirement. Meeting the 75% Partnership Plan target will require a range of initiatives, including an achievable planning policy requirement for affordable housing, but also direct investment in the delivery of affordable housing through, for example 100% affordable housing sites delivered by estates, public bodies and community land trusts.

As the evidence on housing completions shows (see Table 17), the delivery of 100% affordable housing sites has led to the proportion of all new housing provided as affordable housing between 2020 and 2023 representing 47% of all new housing in

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<sup>39</sup> See Schedule 1: Plan outcomes for further information on the implications of the Natural Environment (Scotland) Bill on the Proposed Plan.



Aberdeenshire Council, 71% in Moray Council and 80% in Perth and Kinross Council. The corresponding figure for The Highland Council part of the Cairngorms National Park was 23%. This largely reflects the build out of historic planning permissions with lower affordable housing requirements.

Given the affordable housing need within the National Park, the adopted Cairngorms National Park Local Development Plan 2021 (CNPA016) already seeks 45% affordable housing provision on new development in Aviemore, Ballater, Blair Atholl and Braemar.

External valuer advice from the Valuation Office Agency's Development Valuation Service (CNPA594), which tests a range of development site scenarios in the Cairngorms National Park, is that, with a policy requirement for 75% of new housing to be provided as affordable housing on each development, while the value would be higher than agricultural value, there is a 'high probability that landowners will be less likely to release land in the short term at least'. The external valuer advises that 75% affordable housing might be aspirational and 50% might be a more realistic figure that balances the requirement for affordable housing against landowner expectations.

Appropriate site or settlement specific affordable housing policy requirements, based on this evidence, and aimed at making the most efficient use of land, should be set in the next local development plan. The need to make the most efficient use of available development land means that the aim will be to maximise affordable housing delivery on allocated sites in accordance with the National Park's target that 75% of new housing is provided for social rental, mid market rental or other affordable categories that provide affordability in perpetuity. This approach is necessary to meet the National Park statutory aims (CNPA004), which are explained more fully in Schedule 5: Natural heritage, Schedule 6: Landscape and Schedule 19: Flood risk and water management and considered in the implications for the local housing land requirement in this schedule (from page 143).

It is recognised that this will require innovate approaches to affordable housing delivery, an affordable housing action plan to implement local development plan policy and potentially increased Scottish Government funding. The new duty for public bodies and office holders to facilitate the implementation of the National Park Partnership Plan will be an important tool in the delivery of the higher affordable housing requirement, as it applies to Scottish Ministers and local authorities in the exercising of their housing functions so far as affecting the National Park.



An alternative approach, which seeks to increase the local housing land requirement to deliver a higher number of affordable houses at a lower percentage per development site is not considered appropriate in the National Park, where the developable land resource is limited and finite.

Tailored approaches to rural housing delivery, which could include affordable housing, are set out on page 167.

## **Specialist housing needs**

This section covers matters relating to the following types of need:

- Gypsy and Travellers (page 153)
- Older people and disabled people (page 158)
- People in further and higher education (page 162).

## **Gypsy and Travellers**

In 2019, the Scottish government committed to a 10 point action plan (CNPA1288) to ensure that Gypsy and Travellers have a stronger voice in guiding the future development of their places. This includes reviewing the role of the Housing Need and Demand Assessments; updating Gypsy and Traveller Scottish government planning guidance; and amending the Planning Bill to ensure that planning authorities properly involve Gypsy and Travellers in planning the future of their places.

The Scottish government ran a consultation 'local development plan evidence report – defining Gypsy and Travellers' from December 2022 to February 2023 and published an Analysis of Responses to Consultation (CNPA1289) on 24 March 2023. No further documents have been published.

Section 16B(4)(a)(ii) of The Town and Country Planning Act (Scotland) 1997 (as amended) (CNPA003) requires the local development evidence report to state the steps taken to seek the views of the public at large, including Gypsies and Travellers. In addition, section 16B(3)(c)(i) and (ii) requires the local development evidence report to summarise the actions taken by the planning authority to meet the accommodation needs of Gypsies and Travellers and an analysis of the extent to which the action has helped to meet those needs.

Local Development Plan (CNPA016) Policy 1.10, adopted in March 2021, supports proposals for the development of sites for Gypsies, Travellers and Travelling Show



People, where the need and location has been identified in the relevant Local Authority Housing Strategy.

The Cairngorms National Park Authority engaged the services of Conyach to carry out engagement with the Gypsy / Traveller communities living within the National Park (Figure 38). The work was undertaken in the winter and spring of 2023 – 2024 and published (CNPA028) in June 2024. The engagement explored the needs and aspirations of the community and heard the wisdom and experience already within it. The number of Gypsy and Travellers living in the Cairngorms National Park, either permanently or temporarily, is difficult to estimate with the 2022 Census estimating a population of just six individuals. However, this estimate is unlikely to be representative of the true picture, with a total of 76 people identifying as Gypsy / Travellers engaged through this project.

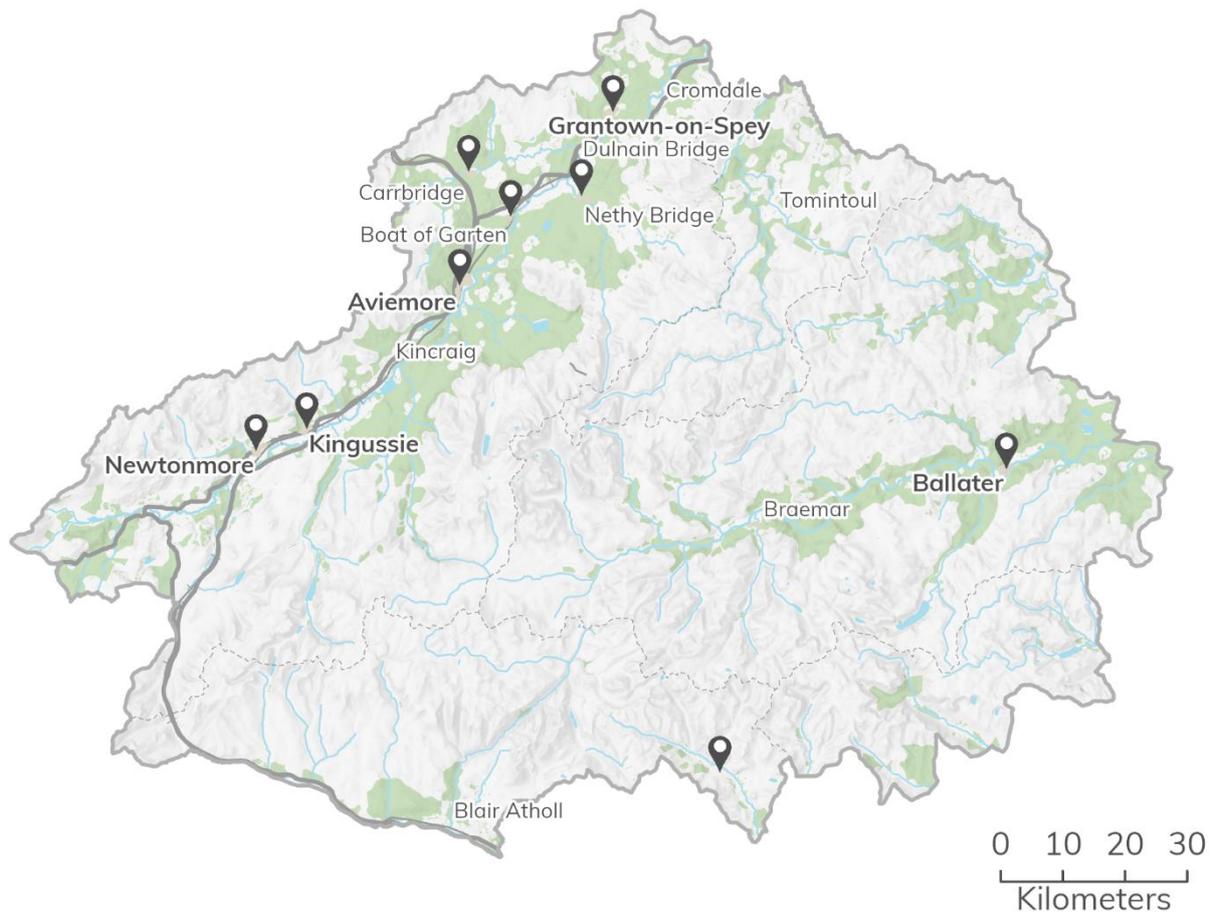


Figure 38 Localities where Gypsy and Traveller communities engaged with by the Park Authority are based. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810 (CNPA028).



The Place Standard approach to community workshops was used to generate a rich conversation in relation to social issues as well as spatial. It highlighted that Gypsy / Travellers feel safe and have a strong sense of identify and belonging within the Cairngorms National Park as well as good access to nature facilities and services. Less strongly, issues were identified with the spatial components of moving around, public transport, influence and sense of control, housing and community, and play and recreation.

Many spoke of family connections in the Cairngorms National Park going back generations and a strong sense of belonging due to a presence in the area for centuries. There is a community heritage related to ancestral camps in the National Park passed on through the intergenerational nature of learning and the ancestry of creativity.

The three themes of National Planning Framework 4 (CNPA008) – sustainable places, liveable places and productive places – were utilised to generate thoughts, actions and recommendations. The outcomes are summarised as follows:

### **Sustainable Places**

- The communities felt that more needs to be done to highlight their culture and heritage in the area, including development of a heritage centre in the east of the national park and increased communication to protect and highlight areas of oral heritage – particularly ancestral stopping places – from development.
- The communities expressed frustration at the lack of access to waste recycling, public toilets and portaloos on the road.
- It was suggested that renewable energy stations could be provided at stopping places, reducing the need for petrol generators and that public transport could be better connected.

### **Liveable Places**

- There is a lack of entertainment for young people and affordable shopping. There could be more inclusive funding for development of community based facilities such as community gardens and play spaces.
- Safe camping places are becoming harder to find and new development is pushing Gypsy / Traveller communities to the margins. Gypsy / Traveller stopping places could be included within each new housing development.
- No specific need for new permanent accommodation was identified, instead there was a desire for more consideration through the planning process for travelling routes, including the protection of culturally and historically important stopping sites from development.



### **Productive Places**

- Accessing employment can be difficult due to distances between Gypsy and Travellers sites and towns and villages.

The engagement included a workshop focussed on designing the perfect camp. This responded to a suggestion that each new housing development should include a stopping place for the Gypsy and Traveller community. This would provide safe places, close to facilities and services that would enable young Gypsy and Travellers to travel and continue to experience their culture, traditions and history.

### **Local authorities' data**

The five constituent local authorities have considered the needs of Gypsies and Travellers in their geographical areas, including within the Cairngorms National Park. These documents are summarised below.

### **Highland**

The Housing Needs and Demand Assessment (CNPA126) states that The Highland Council owns and manages four Gypsy and Traveller sites, with a total capacity of 47 pitches. One of the sites – Laggan Park (6 pitches) is in the Cairngorms National Park. In recent years, on average 41 roadside camps are reported to the council. Most temporary camps are reported in a cluster of locations around Inverness and Nairn, the Black Isle and south eastern Ross-shire.

Highland Council's Local Housing Strategy (2023) (CNPA410) identifies the action to 'work with Gypsy and Traveller community members to have a better understanding of their accommodation needs and preferences and explore and develop workable solutions'. Identified milestones to achieve this are:

- Continue to develop engagement opportunities with Gypsy and Traveller community to assess housing and support needs.
- Organise engagement events/surveys per annum.
- Deliver improvement works to council owned sites.
- Pilot delivery of proposed solutions where feasible such as negotiated stopping.
- Develop and implement gypsy / traveller action plan.

The Strategic Housing Investment Programme 2026 – 2031 (CNPA411) advises that the Highland Council are working with the residents on each of their four Gypsy and Traveller sites with the aim of transforming where they live into 'great places to live and bring up children'.



The Highland Council was awarded £2.150m from the low carbon Vacant and Derelict Land Investment Programme and £4.450m from the Gypsy Traveller Infrastructure Fund from 2023 to 2024 to support works to the Longman Park, Inverness with the Highland Council contributing £1.031m.

### **Aberdeenshire**

Aberdeen City Council and Aberdeenshire Council published the Grampian Regional Equalities Council Research Paper: Accommodation Needs of Ethnic Minorities, Gypsy and Travellers and Travelling Showpeople (CNPA572) in 2022. This summarises and takes account of earlier studies such as the Aberdeenshire Gypsy and Traveller Site Provision Strategy 2021 2026 (CNPA573) and proposals in the Aberdeenshire Local Development Plan 2017.

The research paper explains that Aberdeenshire Council currently provides two public sites. Both sites have consistently high occupancy levels. It recommends that Aberdeenshire Council should prioritise development of four new sites in its future accommodation provision (as identified in the Local Development Plan 2017); with a focus on a site in Buchan and a site from which the city is more easily accessible (Inverurie was suggested as a suitable location).

There were 17 unauthorised encampments in Aberdeenshire in 2021, up from just five the previous year as the pandemic restricted movement among the community. The paper advises that while there is a spread of encampments across five of the six administrative areas within Aberdeenshire, the majority of unauthorised camps have been in the Buchan area and overall, unauthorised encampments by area reflect the movement patterns of Gypsy and Traveller communities along the A90, A93, A96 and A947. No reference is made to the Cairngorms National Park area.

The Aberdeenshire Housing Need Demand Assessment 3: 2023 – 2028 (CNPA567) explains that Aberdeenshire's Local Development Plan 2023 identifies three potential areas for new sites (two halting and one transit), but notes that as the land is privately owned, the build out rate is dependent on private developers and is unlikely to meet any identified need in the short term.

### **Angus**

The Angus Housing Market Partnership's 2021 Tayside Housing Need and Demand Assessment (CNPA577) advises that the 2016 Tayplan concluded that over a five year period, there was a minus seven to minus 15 shortfall in Gypsy and Traveller site



pitches. The Strategic Housing Investment Plan advises, in paragraph 3.14, that the housing need and accommodation of Gypsy and Traveller communities will be closely monitored and opportunities to improve and extend existing provision will be considered.

### **Moray**

The 2023 Housing Need and Demand Assessment (CNPA580) advises that Moray does not have any permanent, temporary or halting sites for Gypsy and Travellers. There were 13 unauthorised encampments across Moray in 2022. There has been a declining number of encampments from a peak of 58 in 2013.

The Moray Council Gypsy / Traveller Housing Needs Assessment (CNPA584) research study was undertaken in 2023. It advised that Moray should prioritise need for one or two public sites offering a combined occupancy (permanent and temporary) of 15 to 20 pitches. Buckie and Elgin should be prioritised for site development. The study contains no discussion on the need for sites in the Cairngorms National Park area.

### **Perth and Kinross**

Gypsy and Traveller accommodation needs are considered in the Perth and Kinross Housing Market Partnership Tayside Housing Need and Demand Assessment 2022 (CNPA586). Core Output 3: Specialist Housing Provision states that in 2016 there was projected to be a minus two shortfall to a four surplus in Gypsy and Traveller site pitches over the next five years. Page 57 of the Housing Needs and Demand Assessment advises that 'Tayside partners are committed to using the evidence provided in Housing Needs and Demand Assessment Core Output 3 as a starting point to robustly evidence future requirements for each form of specialist provision within the development and delivery of their future Local Housing Strategies'.

The Perth and Kinross Local Housing Strategy 2023 (CNPA587) commits to consulting with Gypsy and Travellers to understand their long term needs and preferences in more detail, with a view to updating the Gypsy and Traveller Action Plan. The Perth and Kinross Council housing topic paper (April 2024) notes that the accommodation needs of Gypsy and Travellers and Travelling Showpeople is in need of updating and that an updated needs assessment is programmed to be carried out in 2025 / 2026.

### **Older people and disabled people**

Section 16B(3)(b)(i) and (i) of The Town and Country Planning Act (Scotland) 1997 (as amended) (CNPA003) requires the local development evidence report to set out a



summary of the action taken to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people, and an analysis of the extent to which the action has helped to meet those needs.

The Cairngorms National Park has adopted Local Development Plan 2021 (CNPA016) policies (Policies 1.4 and 3.3), housing supplementary guidance and design and place making non statutory guidance which support housing that is designed for specialist needs. The design and placemaking guidance (CNPA1295) includes an 'Adaptable' section, which promotes development that can accommodate future change and adaptable design that takes into account how people use places differently depending on their age, gender and personal mobility (an increasingly important factor given the rising proportion of elderly people in our communities) and how properties can be adapted to meet the needs of an aging population or those with a disability.

Part of the Cairngorms National Park's response to supporting an aging population is the recognition that greater connection with nature and the outdoors can improve mental and physical health and wellbeing. Cairngorms National Park Partnership Plan (CNPA010) objective B9 seeks to install green health referral programmes in all GP practices in the National Park. Taking preventative action, such as this, at an early stage, can have an impact on long term public health outcomes and on ensuring people remain healthy for longer as they age. Specific responses through the Cairngorms 2030 projects comprise:

- Creating the country's first outdoor resource centre specifically designed to support people living with dementia, their families and carers – enabling enjoyment and exploration of the outdoor environment.
- Working with NHS Highland and partners to deliver a unique public health programme focussed on improving health and wellbeing through access to nature and the outdoors.
- Developing a new economic model for the National Park that benefits people and nature, whilst protecting the planet's resources and special qualities for future generations.

The National Records of Scotland data (CNPA533), summarised in this report, estimates that the population of people of pensionable age in the Cairngorms National Park is projected to rise by 46.3% from 4,629 in 2018 to 6,773 in 2043. This is significantly higher than across Scotland, where the population of pensionable age is expected to rise by 35.5%. There is a need for a diverse range and choice of housing with appropriate options for care and support in the Cairngorms National Park. This also



includes sheltered housing and very sheltered housing options along with care home provision and support for those living with dementia.

Summaries of the evidence of the five constituent authorities is set out below. The full evidence base from which these summaries are taken will be utilised in the formulation of planning policy, in consultation with our local authority partners:

### **Accessible, adapted and wheelchair housing**

The Highland Council's Housing Need and Demand Assessment (CNPA126) finds that there is a relatively high proportion of adapted stock in their area, particularly in the social rented sector, but with lower adapted stock in the private rented sector. However, the number of houses and bungalows within existing stock provides opportunities for in situ solutions. While current needs are being met, future needs are likely to require additional provision including new build, adaptations and care at home services. There is a shift from care homes to care at home. This will have significant implications for housing and home based care and support services.

Aberdeenshire Council's Housing Need and Demand Assessment (CNPA567) highlights that that is a lack of accessible accommodation, with over 900 people waiting for wheelchair / ground floor accessible accommodation. It is estimated that 3,000 properties require adaptations across all tenures. There is an identified lack of accommodation for people with complex care needs and new housing is required.

Angus Council's Housing Need and Demand Assessment (CNPA577) states that current requirements for accessible housing will increase with the aging population. Where adaptations cannot take place, alternative housing options may be required.

Moray Council's Housing Need and Demand Assessment (CNPA580) also notes that there is likely to be an increase in demand for adapted housing, but states that there was a decrease in demand between 2015 and 2019. It is likely that demand on care and support services will increase. Given longer life expectancy, cases are likely to become more complex with increases being seen across a range of client types

Perth and Kinross Council's Housing Need and Demand Assessment (CNPA586) states that unmet need for accessible housing is expressed by almost 2,000 households. Of these, 639 households have an unmet need for wheelchair accessible housing. Based on the last three years, the average annual turnover of wheelchair properties was three wheelchair properties becoming available each year. The Council and its partners are fully committed to increasing the supply of wheelchair accessible affordable housing



through the Local Housing Strategy with a 10% target set through the Strategic Housing Investment Paper.

### **Supported provision**

The Highland Council's Housing Need and Demand Assessment (CNPA126) advises that, with the increase in older person population projected resulting in much higher numbers of people aged 75 years and over, demand for sheltered housing and specialist accommodation models is likely to increase. There will be an ongoing need to provide both temporary and permanent accommodation for women suffering from domestic abuse.

Aberdeenshire Council's Housing Need and Demand Assessment (CNPA567) estimates that there will be a shortfall in capacity for older people's care home accommodation. Work is ongoing to determine the needs for people with mental health issues and for sheltered and very sheltered housing services.

Angus Council's Housing Need and Demand Assessment (CNPA577) states that the number of residents in care homes reduced by 5% between 2007 and 2017. There is an unmet need for more flexible specialist older people's housing, such as housing with care. Models such as sheltered and very sheltered housing have become less popular. There is evidence of unmet need for specialist housing for care groups such as mental health, learning disabilities, older people with addictions and sensory impairment. 'Core and cluster' and housing with care models were identified as most suitable for future commissioning.

Moray Council's Housing Need and Demand Assessment (CNPA580) advises that the number of registered places in care homes for all adults fell by 7% between 2012 and 2022. The number of care homes reduced by 30% between 2012 and 2019, a greater reduction than across Scotland. The number has since remained static.

Perth and Kinross Council's Housing Need and Demand Assessment (CNPA586) states that 62.6% of specialist homes managed by social landlords provide housing for older people including sheltered accommodation and 29% of specialist homes provide accessible housing for people with mobility needs. There are 257 waiting list applications for housing for older people amounting to 7.14% of all applications. This equates to 10 applications for every available tenancy. There were 45 care homes in Perth and Kinross in 2017 which was a 20% reduction from 2007. The occupancy rate is the lowest in the Tayside region at 84%. There is an estimated need for 144 health and



social care partnership commissioned supported housing tenancies, primarily for households with autism, followed by mixed use client groups.

### **Non-permanent housing**

The Highland Council's Housing Need and Demand Assessment (CNPA126) highlights that there will be a requirement to provide housing for seasonal / key workers associated with economic growth or providing essential public services in rural areas. There is also an ongoing need to provide temporary accommodation for single homeless people.

Aberdeenshire Council's Housing Need and Demand Assessment (CNPA567) notes that it is difficult to predict future needs, particularly for refugees and migrants. Young single males, prison leavers, care experienced young people and people experiencing domestic abuse are at a higher risk of homelessness.

Angus Council's Housing Need and Demand Assessment (CNPA577) states that there has been a reduction in homeless applications between 2011 – 2012 and 2019 – 2020. It is one of the main regions for migrant workers.

Moray Council's Housing Need and Demand Assessment (CNPA580) advises that there was a 10% increase in homeless applications between 2020 / 2021 and 2021 / 2022, however the amount of time spent in temporary accommodation is reducing.

Perth and Kinross Council's Housing Need and Demand Assessment (CNPA586) states that seasonal agricultural worker registrations have traditionally been the highest in Scotland.

The Proposed Plan will need to take account of the evidence within the local authority housing need and demand assessments and local housing strategies and ensure that specialist needs can be met.

### **People in further and higher education**

There are no further or higher education institutions within the Cairngorms National Park. There are therefore no identified housing needs within the National Park arising from such institutions.

In the absence of demonstrable need, any proposals for housing relating to further or higher education in the National Park may be addressed on policy basis. There are therefore no implications for the Proposed Plan.



## Implications for specialist housing

No specific need for new permanent accommodation for Gypsy and Travellers has been identified through the evidence within the Cairngorms National Park. It is likely that a policy approach within the Proposed Plan is the best way of meeting Gypsy and Traveller need.

As summarised in this report, the population of people of pensionable age in the Cairngorms National Park is projected to rise at a significantly higher rate than across Scotland leading to high levels of need for a diverse range and choice including sheltered housing, very sheltered housing, care home provision and support for those living with dementia. The Proposed Plan will utilise this evidence base in the formulation of planning policy, in consultation with local authority partners.

## Housing delivery

As part of the preparation of the Proposed Plan, the Park Authority will need to prepare a Delivery Programme that will set out how the Park Authority proposes to implement the local development plan. The Delivery Programme is part of the project management toolkit, helping to focus development planning resources on delivery as well as plan making. It is instrumental to achieving an outcomes focussed approach to development planning. It should support delivery of the Local Development Plan and achievement of its intended outcomes, rather than being focussed on noting progress of particular actions.

According to Scottish Government's local development planning guidance, ideally, delivery programmes should:

- Clearly indicate how sites are prioritised.
- Specify actions and timescales to deliver sites, including any interventions required, and identifying any costs and constraints and a clear pathway to addressing them for example funding sources, timescales / phasing.
- Specify how and when developer contributions will be sought, collected and become available over time to support the delivery of development.
- Establish a deliverable housing land pipeline for the Local housing land requirement.
- Identify a pathway to delivery for longer term allocations.

In terms of housing delivery, the purpose of the housing land pipeline is to provide a transparent view of when land will be brought forward, setting out phasing across the short (one to three years), medium (four to six years) and long term (seven to ten years).



The adopted Cairngorms National Park Local Development Plan (CNPA016) is supported by the Cairngorms National Park Delivery Programme 2025 (CNPA334) which contains information on the status of currently adopted sites. This was informed by the housing land audits of the planning authorities covering the Cairngorms National Park.

### **Implications for housing delivery**

The Cairngorms National Park Delivery Programme 2025 (CNPA334) will help inform the preparation of the Proposed Plan. It will also be important that the Proposed Plan's site assessment methodology gathers sufficient information on ownership, constraints, infrastructure and viability to understand the deliverability of sites. This is covered in Schedule 3: Site Assessment Methodology.

### **Rural housing**

Policy 29 of National Planning Framework 4 (CNPA008) states that local development plans should identify the characteristics of rural areas within the plan area, including the existing pattern of development, pressures, environmental assets, community priorities and economic needs of each area. The policy directs local authorities to use the Scottish Government's 6 fold Urban Rural Classification 2020 to identify remote rural areas.

### **Urban Rural Classification 2022**

While National Planning Framework 4 (CNPA008) directs local authorities to use the 2020 6 fold Urban Rural Classification, since then a 2022 classification (CNPA479) has been released. In the interest of using the most up to date data available, the 2022 classification will be the basis for identifying remote rural areas in the National Park.

The Urban Rural Classification provides a consistent approach to defining urban and rural areas across Scotland. The classification is based upon two main criteria:

- Population, as defined by the National Records of Scotland.
- Accessibility, based on drive time analysis to differentiate between accessible and remote areas in Scotland.

The classification is available in multiple forms, including a 6 fold classification which distinguishes between urban, rural, and remote areas through six categories, and an 8 fold classification which further distinguishes between remote and very remote regions.

### **Population**



The population criteria are derived from the Settlements dataset produced by National Records of Scotland (CNPA533), which defines areas of contiguous high density postcodes that make up a Settlement. There are no large urban areas (populations of 125,000 or more) or other urban areas (populations of 10,000 to 124,999) in the National Park.

### **Accessibility**

Accessibility is measured in terms of drive times to an urban area. This is done by calculating 30 and 60 minute drive times from the population weighted centroids of settlements with a population of 10,000 or more (for example Large and Other Urban Areas). The results allow areas to be classified in terms of accessibility by the following categories:

- Accessible - areas within a 30 minute drive time of a settlement with a population of 10,000 or more.
- Remote - areas that are more than a 30 minute drive time (6 fold classification), or areas that have a drive time between 30 and 60 minutes (8 fold classification) from a settlement with a population of 10,000 or more.
- Very Remote - areas that are more than a 60 minute drive time from a settlement with a population of 10,000 or more (8 fold classification only).

By combining both the population and accessibility measures, the Scotland wide Urban Rural Classification is defined.

According to the Scottish Government's 6 fold Urban Rural Classification 2022 (CNPA479), the vast majority of the Cairngorms National Park is classified as remote rural, therefore the rural characteristics of the National Park are set out throughout the evidence base for the local development plan (Figure 39). Only Carrbridge and Grantown-on-Spey are classified differently – as Accessible Rural.



### 6-fold urban rural classifications 2022

- 5 - Accessible rural
- 6 - Remote rural

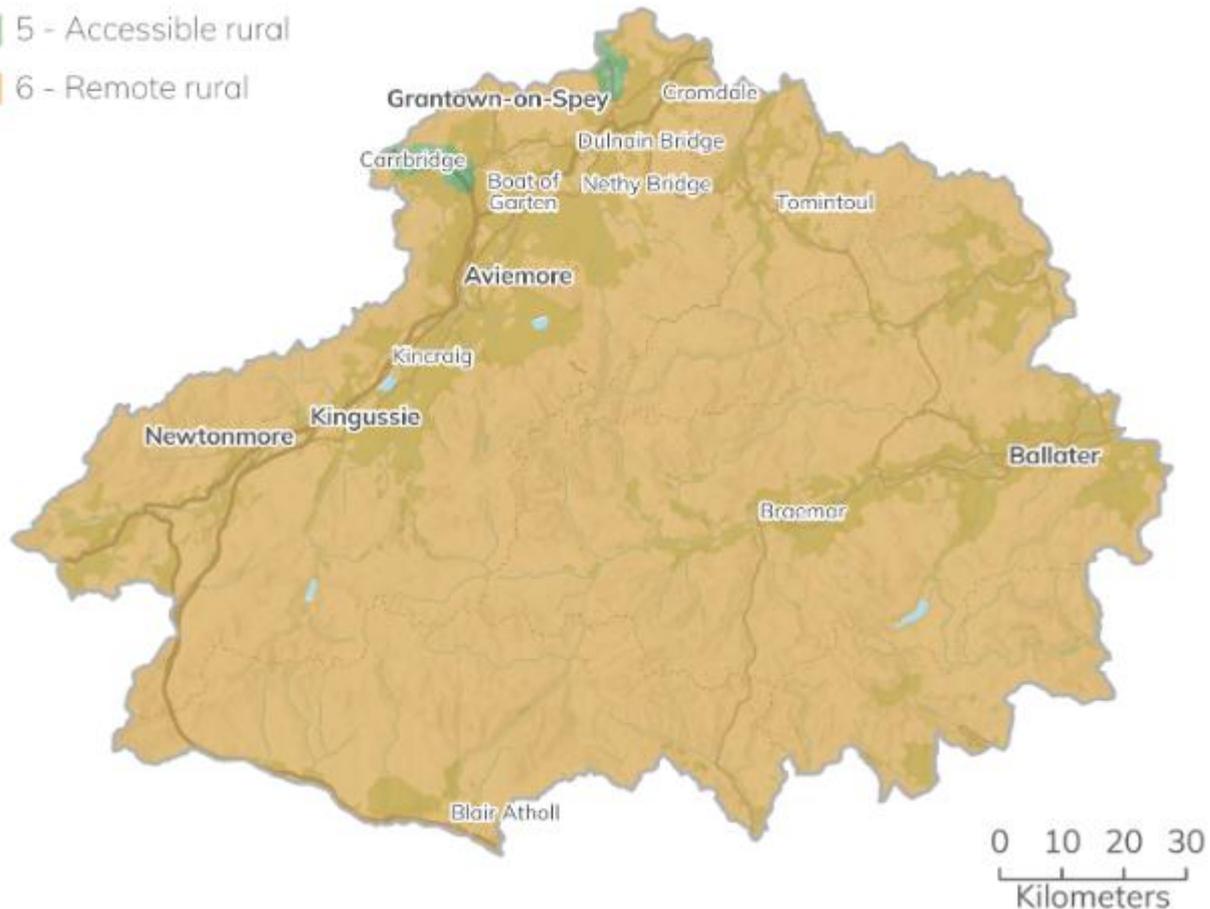


Figure 39 Scottish Government's 6 fold urban rural classifications (2022) within the Cairngorms National Park. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Data © Scottish Government, 2026 (CNPA479).

Development in the Cairngorms National Park mainly relates to agriculture, estate management, tourism and residential dwellings. Other activities do occur, however, including forestry and commercial activity.

The rural characterises of the Cairngorms National Park are covered in Schedule 8: Land use, soil and resources.

With respect to housing, National Planning Framework 4 (CNPA008) and the Town and Country Planning (Scotland) Act 1997 (CNPA003) outline two key considerations:

- The desirability of allocating land for the purposes of resettlement.
- The identification of tailored approaches to rural housing and, where relevant, include proposals for future population growth – including provision for small scale housing such as crofts and woodland.



## **Tailored approaches to rural housing delivery**

National Planning Framework 4 (CNPA008) Policy 16 encourages authorities in rural and island areas to set out, in local development plans, tailored approaches to housing which reflect locally specific market circumstances and delivery approaches. This will feed into the local development plan's delivery programme, which is expected to establish a deliverable housing land pipeline for the local housing land requirement.

Since the majority of the National Park is classified as remote rural according to the Scottish Government's 6 fold Urban Rural Classification 2022 (CNPA479), the entire approach of the next local development plan should be tailored to that rurality. This includes the Partnership Plan's ambition to deliver 75% affordable housing (CNPA010), the spatial strategy as set out within the Partnership Plan and other policy measures that may support the delivery of rural housing need.

Two recent research papers commissioned by the Scottish Land Commission on housing land supply in rural Scotland (CNPA555, CNPA556) and summarised below, provide useful research and recommendations and indicate that further subsidy is often required to service or unlock land in rural areas and that understanding the effectiveness or deliverability of a piece of land is important when allocating land.

### **The Role of Land in Enabling New Housing Supply in Rural Scotland, Scottish Land Commission (2020)**

This paper (CNPA555) aimed to investigate and consider the role of land in enabling or preventing the supply of new housing and put forward solutions and recommendations. The issues found were grouped as follows:

- Landowners and land price - there is generally a lack of activity by mainstream builders in rural Scotland and therefore a lack of published land transaction data. This means it is hard for landowners to establish best value leading in some cases to unrealistic land price expectations. However, in most rural locations, land is a small element of the overall cost of a project – sometimes less than 10% (it may account for 30% of the cost in urban areas). The research also found that landowners were not frustrating the supply of housing land and often actively engaged with communities and developers.
- Speculative housebuilding – this model does not work in most rural areas because there is not sufficient depth of demand nor value to allow developers to generate adequate levels of profit. This leads to a distinct lack of 'mid market' new build supply.



- Development cost outside of market ‘hot spots’, the cost of building a home can be greater than the value of the home once built and more than many people living and working in rural areas can afford.
- Not for profit organisations – community development companies, housing associations and local authorities, supported by public sector grant subsidies, are active in rural Scotland.
- Site effectiveness / deliverability – further subsidy is often required to service or unlock land. This is compounded where sites are allocated in local development plans without first understanding if that land is deliverable. The research suggests that understanding the effectiveness or deliverability of a piece of land is far more important than simply having a willing seller or buyer of land.
- Community development companies – while they play a unique and important role, they need support to help steer them through the challenging land procurement process, to ensure that projects are optimised and are viable.
- Grant funding regimes – subsidies are necessary to address market failure. A stable funding regime is needed for more homes to be delivered.
- The planning system – the research found that the system can be overly protective and ‘relatively static’ in rural areas, although there are great examples of innovative policy and practice. A lack of deliverable land, particularly in areas of high demand and ‘hot spots’ can also place upward pressure on house prices and land prices.
- Availability of tools – The research that there are many tools and examples of good practice in rural Scotland that could help unlock new land opportunities and break down existing barriers.

A series of case studies are presented. This includes a former sawmill site in Rothiemurchus (within the Cairngorms National Park). This summarises the community led development of four self build plots by four local families, financed by the sale of two serviced plots on the open market. This therefore was a ‘no subsidy’ or ‘cross subsidy’ model made possible by a willing landowner and highlights how a collaborative partnership approach can unlock projects. However, it also highlights that the project moved very slowly, demonstrating the complexity of rural housing delivery (in this case partly due to an environmentally sensitive site) and the need for community groups to have more support and resource at an early stage.

### **Land Supply for Housing in Rural Scotland, Scottish Land Commission (2024)**

The aim of this research (CNPA556) was to pick up where the 2020 research (above) left off and make practical recommendations to help deliver a 10 year pipeline of developable land in rural Scotland. The paper makes recommendations under four headings, summarised as follows:



- Delivering housing land – while a national housing land agency (like Homes England) to assemble land was supported by some participants in the research, their conclusion is that an agency may have no clear role and the new local development plan process of preparation and adoption should ensure that public interest in rural housing delivery is achieved without an agency. It recognises that this will require collaboration between key partners and that delivery plans will need ‘tight prioritisation of projects’.
- Alternative governance models – flexible models are suggested that can blend the advantages of the national and local set up. It does recommend that if a national agency is progressed, that the Scottish Land Commission is well placed to consider its constitution, structure, financing and appropriate powers.
- Local Place Plans – the values of these to provide place based community led bottom-up evidence are recognised, however the report recommends that financial support from Scottish Government is needed to support local place plan production to make them effective.
- Increased support to expand existing provision – a ‘carrot and stick’ approach to tackling problematic concentrations of land ownership is identified. Their research (contrary to the first paper above (CNPA555)) is that there is an unwillingness of some key landowners to release land and that this is one of the main barriers to new housing development. Tax incentives for landowners are recommended, where a local need for housing has been identified. Wider use of compulsory purchase orders could also be used to deliver public good, with the paper recommending that the Scottish government should consider new land acquisition powers for local authorities. Masterplan consent areas could also be a useful tool. It also recommends that the Scottish Government could ring fence council tax revenues from long term empty properties for the delivery of affordable homes. Finally, it, like the first research paper, notes the absence of volume housebuilders and demonstrates the crucial role of community led initiatives and rural housing enablers such as Rural Housing Scotland and the Communities Housing Trust. It recommends that housing enablers and small and medium enterprise builders and contractors continue to be supported by the Scottish government.

### **The adopted Cairngorms National Park Local Development Plan 2021**

Within the adopted Cairngorms National Park Local Development Plan (CNPA016), Policy 1: New housing development includes several tailored approaches that may be carried forward, in an original or amended form, into the next local development plan to meet this aim. Notably, these are:

- Policy 1.2: Housing development in existing rural groups, which allows for the modest addition of new housing in locations outwith settlements.



- Policy 1.3: Other housing in the countryside, which seeks to support rural businesses and make use of previously development land.
- Policy 1.5: Affordable housing, which sets out the affordable housing requirement within settlements, including 45% in Aviemore, Ballater, Braemar and Blair Atholl.
- Policy 1.6: Affordable housing exception sites, which sets out for criteria for delivering affordable housing outwith of settlements.

Policy 1, alongside all other policies of the adopted Local Development Plan, has undergone a review as part of the preparation of the Evidence Report. See Schedule 2: Policy monitoring for more information.

It is considered that the current approaches can facilitate the measures of delivery suggested by National Planning Framework 4 (CNPA008), including delivery of housing on crofted land<sup>40</sup>.

### **Resettlement and fragile communities**

Section 15(5)(cc) of The Town and Country Planning (Scotland) Act 1997, as amended (CNPA003), requires the local development plan to consider the desirability of allocating land for the purposes of resettlement.

National Planning Framework 4 Policy 17 (CNPA008) requires local development plans to set out tailored approaches to rural housing and, where relevant, include proposals for small scale housing such as crofts and woodland crofts and the appropriate resettlement of previously inhabited areas. It advises that local development plans should identify, in the spatial strategy, previously inhabited areas that are suitable for resettlement.

Policy 17c supports new homes in remote rural areas where the proposal 'supports and sustains existing fragile communities; supports identified local housing outcomes; and is suitable in terms of location, access, and environmental impact'. Similarly, Policy 29 encourages development that will contribute to rural economies and communities and National Planning Framework 4's cross cutting outcome to achieve rural revitalisation requires greater constraint in areas of pressure and a more enabling approach in rural areas with fragile communities. This requires local development plans to identify existing fragile communities.

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<sup>40</sup> See Schedule 8: Land use, soil and resources for information of croft land within the Cairngorms National Park.



### **Population shrinkage**

As set out in Scottish Government's Migration and Population Expert Advisory Group's report on Place based policy approaches to population challenges (2022) (CNPA557), Scotland is not alone in exhibiting a rising interest in population trends and related policy. Concern is manifest across the developed world. Total fertility rates across most of Europe are now well below replacement levels, and nobody really knows whether what lies ahead for national populations is a steady state, or a slow decline. A report (ESPON 2020 (CNPA56)) found that almost two thirds of rural regions<sup>41</sup> across Europe, containing 40% of Europe's population, are 'shrinking'.

Based on census estimates, the Cairngorms National Park appears to have experienced population decline between 2011 and 2022. However, it is difficult to ascertain the extent of this decline with any degree of certainty, due to the limitations set out on page 43 of this schedule<sup>42</sup>.

The report by the Migration and Population Expert Advisory Group investigates methods of identifying of geographical patterns of population change using small area population estimate data. It identifies two ways in which a 'shrinking' population as an embedded and sustained process can be distinguished from other random fluctuations:

- Duration
- Intensity

In the case of duration, the peak year for each data zone was identified for 2011 data zones. The number of years since that peak was used as an indicator of duration. The average annual percentage population change since the peak year was calculated (and mapped), as an indicator of intensity.

It should be noted that the precise thresholds of duration and intensity which may define shrinking data zones are a matter of judgement. The report therefore presents an illustrative analysis using thresholds 'which seem reasonable, but we offer no specific scientific justification for them'. The report's intention was not to identify specific target zones for policy, but rather to demonstrate the strengths and weaknesses associated with a replicable and evidence based selection procedure, based upon available small area population estimate data, but also informed both by an understanding of complex shrinking, and the associated policy requirements.

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<sup>41</sup> Defined as predominantly rural and intermediate according to a Eurostat urban rural classification.

<sup>42</sup> For further information, see CNPA337 - Statistical areas used in the analysis of the Cairngorms National Park.



Therefore, for the purpose of illustrating how such data may be used to identify a set of data zones most affected by sustained population decline the report combines the duration and intensity criteria. It proposed that a shrinking data zone is one which has been shrinking for more than 10 years, at a rate of at least 1% per annum. The analysis did not identify any data zones which fall within the statistical areas used in the analysis of the Cairngorms National Park as meeting this definition.

It should be noted that the report was compiled before the release of the 2022 census estimates and the subsequent revisions to Scotland’s annual small area mid year population estimate data. Repeating the analysis using rebased population estimates for 2011 – 2022, eight data zones are identified as meeting the definition of a shrinking population (Figure 40).

Shrinking criteria satisfied

- Neither
- One
- Both

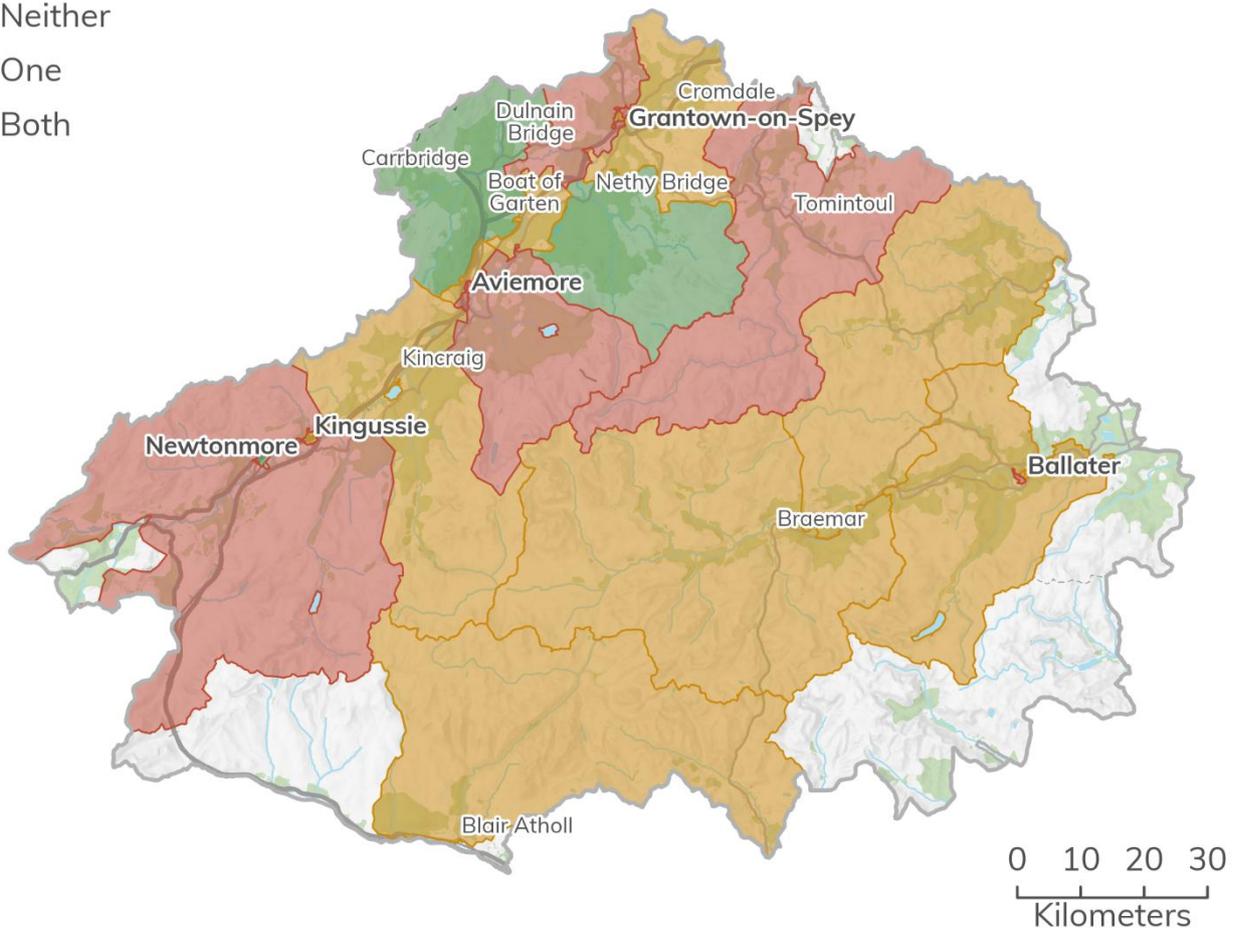


Figure 40 Data zones within the Cairngorms National Park according to whether or not they satisfy the shrinking population criteria – has been shrinking for more than 10 years, at a rate of at least 1% per annum – in 2022. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810. Contains data © National Records Scotland, 2026 (CNPA596).



When considering the matter of a shrinking population against National Planning Framework 4's (CNPA008) requirement for local development plans to consider identifying previously inhabited areas that are suitable for resettlement, it is necessary to consider the nature of population decline. In the Cairngorms National Park, it is not that areas have become depopulated and in need of resettlement; rather it is that deaths exceed births and net migration (see Table 7), while the number of households increased (see Figure 9) – leading to lower average household sizes (see Figure 10). Therefore, the Park Authority cannot identify any previously inhabited areas that are suitable for resettlement in the Proposed Plan's spatial strategy. However, it is necessary to consider whether or not a shrinking population is a marker of community fragility.

### **Fragile communities**

While national and international reports and studies attempt to identify characteristics of fragility, there is no universally established definition of what constitutes a 'fragile community'. The definition of 'community' within this context is also not universally established and the term may be applied to a range of social relationships, which may or may not relate to a specific geography. There is however a range of diverse data available that may be used to characterise 'rural areas' according to their relative socio-economic performance, wellbeing, deprivation or fragility. This data may be used by planning authorities to provide a nuanced, complex and place specific understanding of the needs and challenges, opportunities and assets of different areas.

To aid the application of National Planning Framework 4 (CNPA008), the Park Authority has therefore undertaken an analysis of quantitative methods and data to help identify fragile rural areas within its plan area. This is covered in detail in CNPA596 - Identifying fragile rural areas in the Cairngorms National Park 2025.

The data used in the analysis is also available to download here – CNPA597 – Identifying fragile rural areas in the Cairngorms National Park 2025 – data.

Based on the review of existing measures of rural characteristics, with a focus on those that may indicate fragility, and a review of small area statistical datasets that are currently publicly available, the following indicators, which are grouped into four broad indicator types, have been identified used to determine whether an area is likely to be fragile.

### **Population**

- Population shrinkage



- Old age dependency ratio
- Change in old age dependency ratio

### **Economic**

- Unemployment rate
- Median gross household income per week
- Proportion of low income households
- Number of industries

### **Access to services**

- Drive times to a general practitioner
- Drive times to a retail centre
- Drive times to a primary school
- Drive times to a secondary school
- Public transport times to a general practitioner
- Public transport times to a retail centre

### **Housing**

- Median house price to median household income ratio
- Proportion of second homes
- Proportion of long term empty homes
- Change in proportion of long term empty homes

To be identified as a fragile area according to this analysis, a data zone is classified as a fragile area if the thresholds are met for:

- One population indicator, and at least;
- one economic, access to services or housing indicator.

The analysis found that there are eight data zones within or overlapping the Cairngorms National Park's boundary that meet the classification.



Meets one population and one economic, access to services or housing indicator

- Fragile area
- Not fragile area

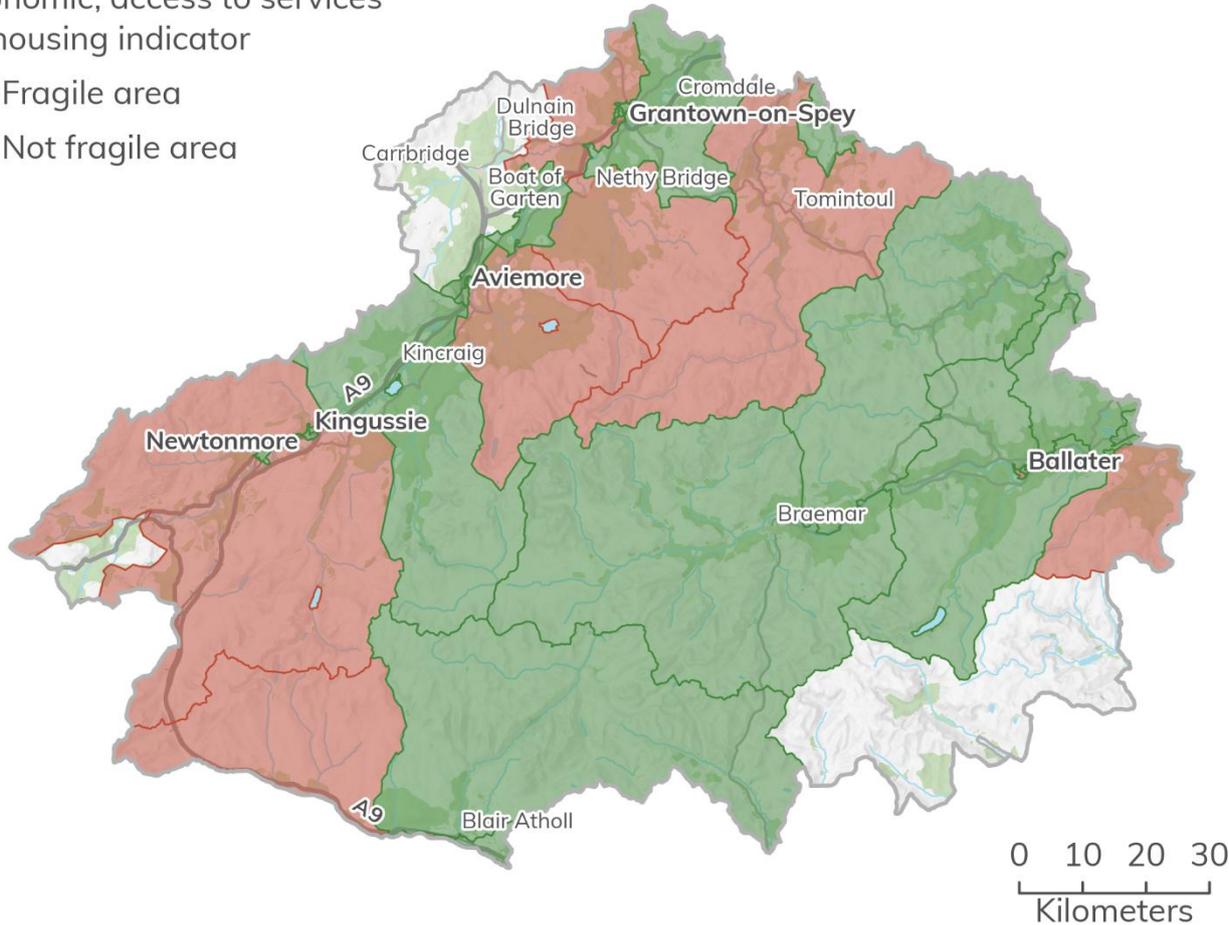


Figure 41 Remote rural and remote small town data zones within or overlapping the Cairngorms National Park boundary that meet one population and one economic, access to services or housing indicator and therefore meet the fragile rural area classification. Cairngorms National Park Authority © Crown copyright and database rights 2026 Ordnance Survey AC0000821810 (CNPA596).

Table 55 provides a summary of the indicator types that were met by each of the areas.

Table 55 Data zones within or overlapping the Cairngorms National Park boundary that meet the fragile rural area classifications (CNPA596).

Data zone reference number	Data zone name	Council area name	Population indicator met	Economic indicator met	Access to services indicator met	Housing indicator met
S01006789	East Cairngorms - 01	Aberdeenshire	✓	✗	✗	✓



Data zone reference number	Data zone name	Council area name	Population indicator met	Economic indicator met	Access to services indicator met	Housing indicator met
S01006797	Aboyne and South Deeside - 04	Aberdeenshire	✓	✗	✓	✗
S01010532	Badenoch and Strathspey South - 02	Highland	✓	✗	✓	✓
S01010539	Badenoch and Strathspey Central - 04	Highland	✓	✗	✗	✓
S01010542	Badenoch and Strathspey North - 01	Highland	✓	✗	✗	✓
S01010543	Badenoch and Strathspey North - 02	Highland	✓	✗	✓	✓
S01011045	South Speyside and the Cabrach - 01	Moray	✓	✗	✓	✓
S01012016	Rannoch and Aberfeldy - 04	Perth and Kinross	✓	✗	✓	✗

The population weighted centroid of two of these data zones (S01012016 – Rannoch and Aberfeldy – 04 and S01006797 – Aboyne and South Deeside – 04) fall outwith the National Park boundary. This means that the majority of their populations live outwith the National Park and that the impact of any policy approaches adopted by the Park Authority are unlikely to have a significant impact on these areas. The areas within the National Park are however worth considering when identifying fragile rural areas in the National Park context, as it will mean that any policy approaches identified in the Proposed Plan may be consistently applied.

The settlements named within the Cairngorms National Park Partnership Plan’s 2022 – 2027 (CNPA010) spatial strategy, which fall within these data zones are:

- Aviemore (part)
- Ballater (part)
- Coylumbridge
- Dalwhinnie
- Dulnain Bridge
- Glenlivet



- Glemmore
- Inverdrue
- Laggan
- Nethy Bridge
- Tomintoul.

The Proposed Plan should consider how the boundaries of identified fragile rural areas are drawn, particularly within the context of settlements that are partially identified in this analysis. For example, due to the small size of the two data zones covering Ballater, it may be worth identifying Ballater as a fragile area in its entirety. This would simplify the application of policy and should make policy outcomes, for example the delivery of affordable housing, easier to achieve.

From a practical perspective, the analysis is limited by the availability of data for small areas. More up to date data is due to be published next year (for example, the 2026 Scottish Index of Multiple Deprivation) and this should be taken account of during the preparation of the Proposed Plan.

The analysis is also entirely quantitative in nature and is not informed by qualitative data, such as that that may be gathered through public engagement. Therefore, the identification of fragile rural areas may be informed and refined during the preparation of the Proposed Plan, which will include direct community engagement, with a focus on placemaking.

The key output of this analysis, therefore, is the framework for analysis that will be used and refined during the preparation of the Proposed Plan, with the aim of identifying fragile rural areas within its spatial strategy.

## **Implications for rural development**

The Proposed Plan should identify fragile rural areas within its spatial strategy based on the analysis carried out in this report (CNPA596). This should include some refinement of boundaries to reflect practical factors such as the implementation of policy. It should also include refinement through direct community engagement carried out during the Proposed Plan's preparation, as this may provide more qualitative information to inform the assessment of fragility.

The identification of fragile rural areas should aid the implementation of National Planning Framework 4 (CNPA008). The Proposed Plan may also consider its own policy



approach for development within these areas, for example by setting higher thresholds for affordable housing.

## **Housing in town centres**

All settlements within the National Park are small, with correspondingly small town and village centres.

A town centre health check was undertaken in 2023<sup>43</sup>. It identified, with the exception of Aviemore, that there is significant residential use in each strategic settlement, with 53% of premises in residential use in Ballater, 52% in Grantown-on-Spey, 73% in Kingussie and 73% in Newtonmore. In Aviemore, 5% of properties are in residential use. See Schedule 22: Town centres and retail for information.

The five designated strategic settlements have identified town centre boundaries which are tightly drawn and have little in the way of vacant or derelict land<sup>44</sup>. Nevertheless, it may be possible to provide a proportion of the local development plan's housing land requirement in these town centres, to respond to National Planning Framework 4 Policy 27.

## **Implications for housing in town centres**

The Proposed Plan should proactively pursue housing in town centres, through the call for sites and ideas process and through ongoing monitoring of the settlements, future town centre health checks and review of the town centre boundaries.

## **Self build housing**

The Planning (Scotland) Act 2019 (Section 16E) (CNPA005) requires planning authorities to prepare and maintain a self build register. The Cairngorms National Park opened its self build register in March 2024, inviting people with an interest in acquiring land for self build across the authority's area to register their interest.

There are (as of 1 October 2025) 113 individuals (this includes families and households) and two groups on the register. Their responses to the registration questionnaire can be summarised as follows:

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<sup>43</sup> See Schedule 22: Town centres and retail.

<sup>44</sup> Further information of vacant and derelict land is contained within Schedule 8: Land use, soil and resources.



Characteristics of those on the register:

- Two of those on the register have stated that they have signed up to a register in another local or national park authority.
- Nearly half of those on the register (47%) already live in the Cairngorms National Park.
- 44% state that they work in the Cairngorms National Park and 3.5% indicate that they are retired.
- 61% are owner occupiers of their current house, with 15% in private rental accommodation and 10% live with their parents, other relatives or with another household. 5% are in worker accommodation and 3% in social rental accommodation.

Preferences of those on the register (respondents could choose multiple options):

- 71% indicated that they would look to build in The Highland Council area, 41% in Aberdeenshire Council, 27% in Moray Council, 21% in Perth and Kinross Council and 13% in Angus Council.
- 72% of those on the register selected a preference for an individual self build project, 54% an individual developer build (custom build), 28% a community / group self build, 12% a developer led group project and 17% co-housing.
- Asked to state whether they would consider a self or custom build plot as part of a larger new build development, 31% said yes and 45% said maybe. 23% said no.
- 73% indicated that they would look for a rural countryside location, 63% a woodland croft, 51% a strategic settlement, 50% a village, 40% an agricultural croft, 21% a countryside housing group and 13% a specific settlement or location.
- 59% stated that they would be interested in a plot with the rural housing burden.
- 30% indicated that that they were unsure what size of plot they were seeing and 28% indicated that they didn't mind. 27% indicated that they were seeking over 1500m<sup>2</sup>, 18% 1,000 – 1,500m<sup>2</sup>, 17% 750 – 1,000m<sup>2</sup>, 20% 400 – 750m<sup>2</sup> and 14% under 400m<sup>2</sup>.
- 82% stated that they would consider conversion of an existing traditional building (such as an agricultural steading), with a further 16% stating that they maybe would. Less than 2% said that they would not.
- 87% indicated, when asked to tick all that apply, that they want to build a detached house, 41% a detached house with ancillary residential accommodation, 28% a bungalow, 7% a semi detached house and 4% a house with specialist adaptive needs. 9% ticked 'other'.
- 35% stated that they require three bedrooms, 27% two bedrooms, 21% four bedrooms, 4% five bedrooms plus and 4% one bedroom.



- 31% stated that they had an overall budget of £300,000 and 16% £200,000 - £250,000. 14% had a budget of £250,000 – £300,000 and 13% under £100,000.

## Implications for self build housing

The information contained within the register, which currently consists of 113 individuals and two groups seeking a wide range of dwelling types, will be used to inform the Proposed Plan, which may include its policy approach to rural housing delivery as well as the provision of self build plots on allocated sites.

## Evidence gaps

There are no identified evidence gaps in this schedule.

## Summary of stakeholder engagement

Housing emerged as the dominant theme through the early online map based engagement, with widespread concern over the lack of affordable housing across the National Park. Participants emphasised the urgent need for housing that supports local people, key workers, and young families. Participants also mentioned difficulties workers had finding suitable and affordable housing, highlighting how shortages affect recruitment and retention in education (CNPA026).

Engagement with Gypsy and Traveller communities revealed feelings of exclusion from housing needs assessments and called for more culturally inclusive accommodation options that respect traditional lifestyles while providing secure and sustainable living spaces. It did indicate a need for allocating new Gypsy and Traveller sites (CNPA028).

Engagement with children and young people revealed concerns about the prevalence of holiday homes and the resulting shortage of affordable housing for local residents. Poor housing design, high property prices, and the lack of seasonal accommodation were also identified as major challenges. It was noted that these factors reduce opportunities for young people and seasonal workers to live and work within the National Park (CNPA027, CNPA681, CNPA682, CNPA833, CNPA683 and CNPA834).

Engagements through playing Planning Power with members of the public in Aviemore and with Cairngorms 2030 officers in our office consistently identified affordable and accessible housing as a top priority. Participants emphasised the need for stronger integration between housing, transport, and employment, calling for policies that support sustainable, energy efficient homes while retaining community character.



Concerns centred on affordability, high living costs, and limited housing availability, which were seen to threaten community stability and workforce retention, particularly for local residents. There was strong support for environmentally sensitive, well designed housing that aligns with conservation goals and provides secure, long term options for key workers, young families, and local people (CNPA1105 and CNPA1104).

These comments were considered in the drafting of this section of the evidence report.

Early engagement (CNPA807 and CNPA812) on the draft of this schedule was undertaken with planning and housing officers from the five constituent authorities, and their comments were incorporated prior to undertaking broader public engagement. This mainly related to including updated information, correcting errors and clarifying conclusions.

Public engagement on this schedule (see CNPA1353 for engagement version) was carried out from 15 August – 26 September 2025. As part of the public engagement, developers, landowners, housing providers and other interested parties were invited to comment on the contents of the schedule, including the indicative housing land requirement and approach to affordable housing.

Direct engagement was also held with developers, landowners, housing providers and other interested parties through the Cairngorms National Park Developers Forum (CNPA030) provides an agenda and attendance list). A summary of the discussion at this forum is provided in Schedule 2: Policy monitoring.

Twelve completed responses were received (CNPA1340). Six agree that the evidence presented is sufficient to inform the preparation of the Proposed Plan. One does not know, and five disagree that the evidence presented is sufficient.

## **Summary of implications for Proposed Plan**

Based on the available evidence and engagement with key agencies and other interested parties, the Park Authority consider this schedule to provide a sufficient evidence base on which to prepare the Proposed Plan.

The Proposed Plan needs to be prepared in accordance with:

- The four aims of the National Park as set out in The National Parks (Scotland) Act 2000 (CNPA004).



- Section 9(6) of the 2000 Act, which states that while the aims are to be pursued collectively, if there is conflict between the first aim and any of the others, greater weight is given to the first aim.
- The spatial strategy and principles of National Planning Framework 4 (CNPA008), in particular by:
  - Supporting development that helps to meet the diverse housing needs of people living in the Cairngorms National Park, recognising the aging population.
  - Supporting a planned response to minimise the impact of the high level of second homes and short term lets on local communities.
  - Ensuring new homes respond to the very high affordable housing need.
  - Setting out tailored approaches to rural housing including the identified fragile areas.

In its preparation the Proposed Plan should:

- Align with the Cairngorms National Park Partnership Plan 2022 – 2027 (CNPA010), for which all public bodies and office holders, including Scottish Ministers, the National Park Authority and local authorities, must facilitate the implementation of in exercising their functions so far as affecting a National Park. In particular through:
  - Following the spatial strategy by consolidating the role of the strategic settlements as the most sustainable places for future growth and the focus for housing land supply and providing any additional flexibility in future land supply for housing at small sites around a wider range of settlements<sup>45</sup>.
  - Supporting the objective B1 target that the proportion of young and working age people increases relative to the total resident population, which remains stable;
  - Supporting the objective C1 target that a maximum of 15% of all housing stock in the National Park will be second homes, vacant or short term let properties by 2040.
  - Supporting the objective C2 target that by 2030, 75% of new housing is for social rental, mid market rental or other affordable categories that provide affordability in perpetuity, by setting appropriate percentages for affordable housing on market sites.
  - Supporting objective C3 target that the percentage of developable land in community or public body ownership is increasing.
- Take account of the priorities of community action plans, many of which prioritise a socially connected community with affordable places to live.

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<sup>45</sup> See Schedule 1, Figure 4 for a summary of the spatial strategy.



- Have regard to the constituent local authorities' local housing strategies and housing need and demand assessments which, together with other evidence have led to the setting of an indicative 10 year local housing land requirement of 889 new homes. The Proposed Plan will have to allocate sufficient deliverable sites to meet the local housing land requirement over the period of the plan.
- Undertake a call for sites and a site assessment process, including the assessment of housing sites to be carried forward from the adopted local development plan, to establish a housing land pipeline to meet the local housing requirement. Set this out in a draft local development plan delivery programme.
- Meet the evidenced limited Gypsy and Traveller need through a policy approach, rather than allocations, that responds to the issues identified by the engagement work.
- Review adopted local development plan policies to ensure the Proposed Plan responds to the specialist housing provision needs, including for the projected growth in older people requiring accessible, adaptable and wheelchair accessible homes; supported accommodation, care homes and sheltered housing; and homes for other specialist groups.
- Set out tailored approaches to rural housing, following the approach set out in this report, identify fragile rural areas in the spatial strategy.
- Proactively pursue housing in town centres, through the call for ideas and sites process and through ongoing monitoring of the settlements, future town centre health checks and review of the town centre boundaries.
- Have regard to the list of 113 individuals and two groups registered as seeking to acquire land in the Cairngorms National Park for self build housing.

## Statements of agreement

The following people / organisations agree that the evidence presented is sufficient to inform the preparation of the Proposed Plan:

- Historic Environment Scotland (C002)
- Scottish Environment Protection Agency (C010)
- Scottish Forestry (C011)
- Atholl Estate and Dalhousie Estate (C032)
- Land Management (Scotland) Ltd (C047)
- Richard Moore (C105)



## **Historic Environment Scotland (C002)**

Historic Environment Scotland welcomes the recognition of the links between this topic area and the historic environment. As part of their evidence submission to the Cairngorms National Park Authority, they have supplied information on both Buildings at Risk (currently paused) and national data around the age and use of Scotland's built environment. They advise that this data shows that almost 20% of Scotland's housing stock is of traditional construction and that this highlights the opportunities and challenges for the historic built environment.

## **Scottish Environment Protection Agency (C010)**

Scottish Environment Protection Agency advises that they have recently commented on drafts of topic papers and have been happy with the content. They have no further comment to make (CNPA1420).

## **Scottish Forestry (C011)**

Scottish Forestry advises that matters that concern them are appropriately addressed in the Schedule 5: Natural heritage and that the suite of schedules, including housing, actively reference this. Scottish Forestry have no further comments (CNPA1421).

## **Atholl Estate and Dalhousie Estate (C032)**

While agreeing that the evidence presented is sufficient to inform the preparation of the Proposed Plan, Atholl Estate and Dalhousie Estate consider that the correct implications for the next local development plan have not been identified.

They advise that they recognise the challenges that the lack of affordable, energy efficient and suitable housing has on quality of life within the National Park and the local economy. They submit that, in terms of the implications this has for the new local development plan, rather than limit the extent of private homes (Cairngorms National Park Partnership Plan Objective C2) which often as part of new development projects finances site wide infrastructure or restricts the extent of second homes / short term lets (Cairngorms National Park Partnership Plan Objective C1) which runs the risk of artificially increasing property prices, policy focuses on the delivery of serviced land in accessible locations and financing models for a wide range of housing tenures. This can positively include custom and self build, low cost home ownership and private homes, with mechanisms such as financial contributions to support all affordable sites. Ristol Consulting Ltd (on behalf of Atholl and Dalhousie Estates) would welcome the opportunity to explore delivery options undertaken by both Atholl and Dalhousie Estates



with the Cairngorms National Park to assist with the local development plan review process.

### **Park Authority response**

The Park Authority would welcome the opportunity to discuss and explore delivery options with representatives of Atholl and Dalhousie Estates. This may be undertaken through the call for sites and ideas consultation.

A variety of delivery mechanisms will be required to deliver a diverse range of housing types and tenures including custom and self build, low cost home ownership and private homes.

It should be noted that the Cairngorms National Park Partnership Plan 2022 – 2027 (CNPA010) is the overarching management plan for the Cairngorms National Park and was approved by Scottish Ministers following consultation. The Local Development Plan must align with the Partnership Plan and, in relation to the comments of both the Atholl and Dalhousie Estates, the aim of housing policy will be that new development contributes to the Partnership Plan objectives in relation to access to housing and new housing. This will require a wide range of financial models and delivery mechanisms.

### **Land Management (Scotland) Ltd (C047)**

While agreeing that the evidence presented is sufficient to inform the preparation of the Proposed Plan, Land Management (Scotland) Ltd comment, having skimmed the report, that what needs to be recognised is that a remote area such as the Cairngorms National Park, will inevitably attract middle aged, financially secure people who have either no children or that have left home. The availability of facilities and services for younger folk across the National Park area will, in their opinion, draw younger families to cities and places with more facilities.

### **Richard Moore (C105)**

While agreeing that the evidence presented is sufficient to inform the preparation of the Proposed Plan, Richard Moore comments that housing development needs to be strictly limited and in keeping with the natural environment. His personal interest is in keeping the park as wild as possible – He favours rewilding and more native trees. He is concerned at the degradation of Scotland's natural landscape - especially with the effect of monster pylons in some parts. Native species are in decline, and some are threatened by changes to the infrastructure. The landscape is our major resource - obviously of benefit to tourism but only if it remains beautiful. He comments that he has



seen the effects of the degradation of landscape in Donegal and would hate to see similar in Scotland. While places become yet more precious when there are so few left, he wants people to be able to live, work and enjoy recreation in the National Park but the landscape – its sustaining and preservation – should come first.

### **Park Authority response**

The Evidence Report sets out how landscape and natural heritage considerations need to be taken into account in the preparation of the Proposed Plan – see Schedule 5: Natural heritage and Schedule 6: Landscape. Crucially, the Proposed Plan will need to be prepared in accordance with the four aims of the National Park (CNPA004), which includes the aim ‘to conserve and enhance the area’s natural and cultural heritage.’

### **Scott Peacock (C108)**

Scott Peacock states that he does not know if the evidence presented in this report correctly identifies the characteristics of the Cairngorms National Park because he has not had time to review it but wanted to provide some input.

## **Statements of dispute**

The following people / organisations disagree that the evidence presented is sufficient to inform the preparation of the Proposed Plan:

- Newtonmore and Vicinity Community Council (C029)
- Invercauld Estate (C044)
- Mar Estate (C048)
- Eric Baird (C080)
- Rory Richardson (C106)

### **Newtonmore and Vicinity Community Council (C029)**

Newtonmore and Vicinity Community Council considers that the evidence presented in this report does not correctly identify the characteristics of the Cairngorms National Park. They state that The Cairngorms National Park does not seem to have sufficient authority to alter the current development of housing in Newtonmore. Whilst any written objectives, goals, targets, desirable outcomes (call them what you like) - may be laudable, where is the evidence to demonstrate that local priority residents have been given the opportunity to apply for real affordable housing?

They say that they know of additional information that would help inform the preparation of the next Local Development Plan. They explain that they consider that



the Local Development Plan needs to be more targeted when it comes to housing. Using S.M.A.R.T. objectives to demonstrate to residents of the local area that the Park Authority is delivering for the local community. At present, they say that many they have spoken with see the Park Authority as another political quango with little relevance to those living within the Nation Park - other than the odd minor planning intervention.

They say that they don't know whether the correct implications for the next Local Development Plan have been identified, but that they consider that there is no real change from previous iterations of this local development plan - from a housing perspective.

### **Park Authority response**

The Highland Council, as the Housing Authority, is responsible for determining to whom affordable housing is allocated. The Cairngorms National Park's role is to secure affordable housing delivery through planning applications. The Cairngorms National Park Local Development Plan Delivery Programme is the document that sets out what affordable housing has been built in the current local development plan period. This document is referenced in this schedule's evidence. The Delivery Programme (CNPA334) sets out in Section 3 that 20 affordable dwellings (25% of the total number of houses permitted) are under construction on the site (H1: Land between Perth Road and Station Road) allocated in Newtonmore in the Local Development Plan 2021.

### **Invercauld Estate (C044)**

Invercauld Estate considers that the evidence presented in this report does not correctly identify the characteristics of the Cairngorms National Park. They set out what evidence would help inform the preparation of the next local development plan and consider that the correct implications for the next local development plan have not been identified. They make three points, which are set out in their own words below:

- **Evidence of delivery of local development plan allocated housing sites**

They say that they could not see in the report information relating generally, and specifically to that part of the National Park within Aberdeenshire, on the percentage of allocated housing units that were built out in the current or previous local development plan periods.

Without this data, they believe the statement at page 121 of the report that 'the evidence indicates that the Scottish Government's identified 10 year all tenure minimum housing land requirement figure for Aberdeenshire Council of 170



dwelling is ambitious and higher than the evidenced need' is not adequately supported.

They state that consideration must be taken of what proportion of the land supply actually delivers the housing need within the Plan period. They say that they appreciate that many housing units in Deeside have recently been delivered outwith allocated sites on the back of other policies (for example enabling appropriate conversion of old steadings, and a former school in Ballater, into houses), however the new housing supply is also connected to the future of these very policies. They believe those creating the next local development plan need therefore to be aware of the conversion rates of allocated sites into inhabited houses in the current and past local development plan's in order to fully inform both future site allocations and the creation of these other policies if they are to ensure adequate housing can be delivered.

- **Evidence to demonstrate that a 75% affordable housing target will deliver the objective**

In addition, they understand that the Cairngorms National Park Partnership Plan 2022 - 2027 (CNPA010), which is referenced as a document to be taken into account in creating the next local development plan, identifies an objective to 'ensure that there is sufficient affordable housing stock to enable people to live and work within the National Park.' (Cairngorms National Park Partnership Plan 2022 - 2027, page 80). They believe this is an important objective. However, the Cairngorms National Park Partnership Plan 2022 - 2027 also states (at C2 - page 82) a target that 'by 2030, 75% of new housing is for social rental, mid market rental or other affordable categories that provide affordability in perpetuity.' For this target to be incorporated into a local development plan there needs to be a robust evidence base that demonstrates that this target will actually deliver the aforementioned objective and not be detrimental to it. They have not seen any such evidence however, other than the valuation evidence at page 137 (which suggests it will have a negative effect on delivery). The evidence to show where such a policy has worked and where it has not worked is essential. We understand for example that Aberdeenshire Council may have used a similar policy in a specific area previously before abandoning it as it did not deliver the affordable housing desired. Part of this evidence should also be the rate of delivery of affordable homes in allocated sites where the 45% affordable target



currently exists to inform how successful or otherwise this policy has been in delivering affordable housing in the different Council areas of the Cairngorms National Park.

- **Evidence of the impact that a 75% affordable housing target will have on each Council area's housing policies and funding**

Finally, they consider that a target of 75% affordable housing in new developments will naturally put off a large number of potential private developers (who deliver the vast majority of affordable homes in Scotland) from seeking to undertake developments within the Cairngorms National Park. They ask what interrogation has there been of the impact of this on affordable housing delivery in the different Council areas of the Cairngorms National Park with their differing housing policies and funding? They say that this also links to their earlier point, in that if the number of allocated units within the Cairngorms National Park is unnecessarily restricted, whether through land allocations or specific policies, the number of homes delivered within the Cairngorms National Park will be less than it otherwise could be, potentially acting as an inflationary factor in house prices exacerbating the lack of affordable housing for local people.

### **Park Authority response**

The Park Authority would welcome the opportunity to discuss and explore delivery options with Invercauld Estate. This may be undertaken through the call for sites and ideas consultation.

A variety of delivery mechanisms will be required to deliver a diverse range of housing types and tenures including custom and self build, low cost home ownership and private homes.

It should be noted that the Cairngorms National Park Partnership Plan 2022 – 2027 (CNPA010) is the overarching management plan for the Cairngorms National Park and was approved by Scottish Ministers following consultation. The Local Development Plan must align with the Partnership Plan and, in relation to the comments of both the Atholl and Dalhousie Estates, the aim of housing policy will be that new development contributes to the Partnership Plan objectives in relation to access to housing and new housing. This will require a wide range of financial models and delivery mechanisms.

To respond to Invercauld Estate's comments, the following amendments been made to the schedule:



- Added additional evidence and discussion in relation to new housing completions in each constituent authority from page 90, including an analysis of provision on windfall and allocated sites.
- Added additional discussion and justification for asserting that the evidence summarised in Table 42 indicates that the Scottish Government's identified 10 year all tenure minimum housing land requirement figure for Aberdeenshire Council is ambitious and higher than the evidenced need.
- Added a specific conclusion on affordable housing from page 150 with additional text that considers this issue.

### **Mar Estate (C048)**

Mar Estate advises that they are a major landowner within the National Park owning some 16,000 acres in and around the village of Braemar (CNPA1418). The Estate is committed to delivering homes including homes to meet the needs of the community of Braemar in support of sustainable economic development.

Mar Estate believes that Braemar needs a deliverable supply of land for affordable and mainstream housing as well as business / workspace. Braemar has seen significant changes over the last decade, and it is essential that the future of the village is well planned with a growth plan put in place. The next local development plan must be ambitious and flexible and not be a barrier to sustainable economic growth and housing delivery with an emphasis on delivery.

Mar Estate notes the Cairngorms National Park Partnership Plan's ambition to deliver a 75% affordable housing target in the National Park. Mar Estate does not accept this is a viable proposition. In Braemar, a requirement of 45% affordable housing was set as part of the current local development plan. This is somewhat disconnected to the size of the village and the allocations in the local development plan. The higher requirement, in their opinion, has delayed the delivery of housing. The topic paper suggests the requirement for 45% affordable housing was set for the larger settlements. With a population of 800, Braemar cannot be considered to be large especially compared to Aviemore (3,000), Grantown on Spey (2,510) and Ballater (1,500). The requirement for 45% affordable housing in Braemar cannot be justified either in terms of the Housing Need and Demand Assessment with it being the 24th most pressured settlement in Aberdeenshire for housing need. It appears that the 45% requirement from the previous local development plan has therefore been set as a requirement due to the low number of allocations. It is suggested that the next local development plan, considers allocating more land in Braemar for development for housing. There are a number of sites that can be



considered for sensitive development fitting within the landscape and these will come forward as part of the Call for Sites.

Mar Estate notes that a valuation report has been carried out to assess the tipping point of viability for affordable housing. Whilst it is welcomed that a valuation report has been carried out, the report has been heavily redacted and as such does not provide sufficient detail to consider whether the cost and margin assumptions are correct. The suggested 50% affordable requirement will result in landowners not selling their land, contrary to what is suggested in the paper. This will result in a lower delivery of affordable homes than targeted. It is recommended that in order to ensure the ongoing delivery of affordable housing land, the requirement should be set at a more reasonable 25%. This will help viability and ultimately secure more deliverability.

Mar Estate considers that the topic paper has missed an opportunity to explore, in detail, new mechanisms to deliver housing to meet a variety of housing needs in the Cairngorms National Park area. As an example, Mar Estate is keen to promote a model for shared equity self-build plots. The equity share would be retained by the Estate and be for the benefit of local people. A further alternative mechanism would be to identify, in agreement with landowners and the community, specific sites for affordable housing. The sites would be of sufficient size to provide the efficiencies to allow the homes to be delivered by a Registered Social Landlord (RSL) or similar enabling body. Affordable “credits” would then be granted to the landowner and land within the same ownership, without a specific affordable housing requirement, would be zoned for housing.

### **Park Authority response**

The Park Authority would welcome the opportunity to discuss and explore delivery options with representatives of Mar Estate. This may be undertaken through the call for sites and ideas consultation.

To respond to Mar Estate’s comments, a specific conclusion on affordable housing has been added from page 151 with additional text that considers this issue.

### **Rory Richardson (C106)**

Rory Richardson considers that the evidence presented in this report does not correctly identify the characteristics of the Cairngorms National Park. He comments that the Cairngorms National Park has never and has no proper plans to help the local communities. He explains that until the holiday and second homes are penalised more severely there will continue to be a second Highland clearance. He says – take Laggan, Dalwhinnie and Kinlochlaggan primary schools which have all been shut down due to



Cairngorms National Park policies. How about revealing how the population in these villages has dropped in the last 50 years. And mainly due to the second and holiday homes.

**Park Authority response**

The Park Authority notes these comments but does not consider that the issues raised indicate that the evidence in this schedule is incorrect or insufficient. Evidence relating to short term lets and second homes is presented in the schedule. The schedule also summarises all housing priorities and proposals set out in Community Action Plans produced by communities within the National Park.