

CAIRNGORMS NATIONAL PARK LOCAL PLAN

PUBLIC LOCAL INQUIRY

Policy 21 Contributions to Affordable Housing

Statement of Case for Rothiemurchus Estate

1. Rothiemurchus Estate lodged an objection to Policy 21 on the grounds that the requirement for between 25% and 40% of all housing units to be affordable on developments where public funding is available is insufficiently flexible for planning a successful new community at An Camas Mòr.
2. Since lodging this objection Cairngorms National Park Authority Housing Topic Paper, March 2009 has provided more detail and concludes at paragraph 104 that decisions will be based on “individual Community Needs Assessments which will give detailed information at settlement level”.
3. It is noted that the proposition of restricting a proportion of development to local needs as part of the affordable policy at paragraph 60 was excluded from the conclusion. It is therefore understood that the term affordable includes only housing for people who qualify according to current policy.

An Camas Mòr

4. The objective at An Camas Mòr, to realise the views expressed at local public meetings, is to develop a balanced new community over a twenty year period, providing homes, employment, social, educational and recreational facilities. A balanced community is one where population and tenure mix will be equivalent to the national average not skewed to any one section, and where economic and social success limits the need for commuting to other places for work and services.
5. The proportion, types and allocation of affordable housing proposed at An Camas Mòr for people in need on modest incomes will support this objective. It will also meet the needs of people on incomes above the level to qualify to rent from social landlords but who find it impossible to buy in the existing market. Consequently the proposed community design allows for high density smaller house units as part of the balanced provision. It is expected that 80% of the houses will be between one and three bedrooms, and that a proportion of these will be for rent by social landlords or available for low cost ownership.

Affordable Housing at An Camas Mòr

6. Fundamental financial readjustments are taking place now across banking, house building and mortgage markets. Previous assumptions about developers' abilities to deliver these levels of affordable housing as part of the traditional funding package for new development will have to be reviewed. The current markets have undermined affordable housing mechanisms that have been put in place over recent years and new development cannot support all the contributions that would have been possible two years ago. The National Park Authority has a strong opportunity to overcome this problem at An Camas Mòr where there is a single land control with a long term interest in the success of the project and the quality of the development willing to partner the Local Housing Authority in delivering affordable housing.
7. Policy 21 implies that 40% of the one to three bedroom housing units proposed in the An Camas Mòr Indicative Land Use Plan will be in the affordable category. This would make it more difficult to accommodate residents from the middle income groups who make up the largest constituent of a thriving economy. In our view, as currently drafted, this would not be compatible with the overall vision of a balanced community. In addition there is currently a need to achieve a housing ladder so that as the needs and circumstances of families change they can move out of subsidised housing. This also allows for a move to a larger house or to downsize. The proposed policy reduces the range of housing and therefore options and choice.
8. The blanket formula of a fixed percentage of affordable housing funded by market housing development is inflexible and does not allow for varying the rate and make up of housing at each phase of An Camas Mòr. The proportions of affordable houses should be agreed on a phase by phase basis at An Camas Mòr. Achieving a sustainable community mix at each phase is more important than achieving pre-defined numerical housing targets.
9. The intention is to work closely with the Highland Housing Alliance to set up a long term joint venture for the delivery of a broad range of affordable housing to provide for social rent, mid rent, and low cost ownership, over the full life of the development of An Camas Mòr. The joint venture would share the load on the up front infrastructure to ensure that quality standards are not compromised whilst securing the long term supply of land for affordable housing.
10. A first draft Community Need Assessment for housing has been undertaken in the Social and Economic Impact Assessment which accompanies the planning application for An Camas Mòr. The table below indicates how housing tenure could reflect this need during the stages of development at An Camas Mòr with a greater emphasis on provision by social landlords and supported ownership during the early phases.

Household Tenure	Aviemore 2001	Badenoch & Strathspey 2001	Scotland 2001	<i>An Camas Mòr 2025</i>	<i>An Camas Mòr 2016</i>
Total number of households	1,166	5,057	2,192,246	1500	450
% of households that are					
owner occupied	59.1%	65.7%	62.6%	77%	47%
rented from the Council/Scottish Homes	18.2%	14.1%	21.6%	0	0
rented or shared ownership from a housing association <i>or private affordable</i>	6.6%	2.6%	5.6%	10%	35%
private rented	12.6%	10%	6.7%	10%	15%
living rent free	3.5%	7.7%	3.5%	3%	3%

Conclusions

11. Therefore Policy 21 is too prescriptive as a policy to be applied to An Camas Mòr as a whole. PAN 74, which is the basis for national policy on affordable housing, states (para 34) that the benchmark figure is that each site should contribute 25% to the total number of affordable units, and (para 35) that a higher percentage may be sought on a specific site, but only in exceptional circumstances. We accept that at times there may be an exceptional circumstance within a phase in which a site may be appropriate for an innovative form of affordable housing. Such a decision is best left to agreements between developers, householders and the Authority. It is inappropriate as a blanket policy for a whole community.
12. Policy 21 should be re-worded to reflect this need for flexibility. The re-wording contained in Core Document 7.28, the Officer proposed post inquiry modifications, recognises this need for flexibility to avoid impacting on the economic viability of development. Also in social terms the wording should allow for the ability to consider the proportion of affordable housing at each stage of the An Camas Mòr new community to enable it to become a balanced community. This objection can be withdrawn if this wording is to be included in the Post Inquiry Modifications to the Local Plan.

April 2009