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Garden House  
Morven Way  
Ballater  
Aberdeenshire  
AB35 5SF  
21 April 09

Ms S Krawczynska  
Inquiry Programme Officer  
Cairngorms National Park Authority  
14 The Square  
Grantown on Spey  
PH26 3HG

Dear Ms Krawczynska,

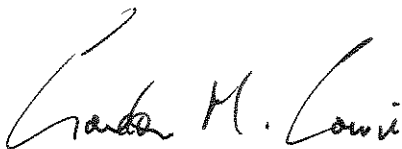
**Cairngorms National Park Local Plan: Objector 085**

Please find enclosed 6 copies of my written submission to the Reporters for the Local Plan Enquiry. This submission covers the outstanding objections registered under Objector 085 and relate to both the Deposit Plan and 2<sup>nd</sup> modifications.

As suggested by you in your e-mail of 23 March in response to my letter of 20<sup>th</sup> March, I will send a copy as an attachment to an e-mail so that you can prepare the required CD in PDF format.

Can you please acknowledge receipt of this letter and documents?

Yours sincerely,



Gordon M. Cowie

## CAIRNGORMS NATIONAL PARK LOCAL PLAN

### Written Submission to the Local Plan Enquiry Gordon M. Cowie Objector 085

#### Summary of Outstanding Objections

1. there should be a significant reduction to the number of houses planned
2. there needs to be a commitment to establish a screen to the east of the housing at least as wide and to the same high standard as recently established for the new housing area to the south of the current proposal
3. there should be no houses on the field to the west of Monaltrie House
4. a clear commitment is needed to ensure that the plan indicates a limit of eastern expansion of the village in order to maintain the iconic view from the top of the hill on the A93 just to the east of the Pass of Ballater
5. the reduction in the proportion of affordable housing from 40% in the deposit plan to 25% in the 2<sup>nd</sup>. modification is unacceptable.

Objections 1, 2 and 4 can be covered together and these are the key issues in my objection. It might be helpful therefore if I expand on Objections 3 and 5 first of all.

#### No housing on the field to the west of Monaltrie House

Monaltrie House is a listed 18<sup>th</sup> Century building and the oldest building in Ballater which was initially developed by the first owner. It stands in its own grounds on the terrace above the flood plain. The principal entry is through a recent housing development, which detracts from the setting of the House, but this is mitigated by the access road running through open ground for the last stretch. If this open ground has housing, the setting of this historic house would be very severely affected. Further, I have just recently become aware of the "Cairngorms Landscape Capacity for Housing Final Report" dated August 2005 and commissioned by the Cairngorms National Park Authority. It refers to this area as "Elevated Grassland". On p 8 of the report is a summary table which classifies this area as "Very High Sensitivity" regarding Landscape Character and Experience – "The area of fine acidic grassland and parkland offers a distinctive contribution to local landscape character, which contrasts significantly with the adjacent woodland and farmland" There is "Some Sensitivity" regarding Landscape Setting – "The field contributes to the setting of Monaltrie House, but only locally to the setting of the settlement". In addition, the classification under "Settlement Form" is "High Sensitivity" A copy of this table is appended.

This report, which as a retired land manager I recognise as having been very professionally produced, was ignored in identifying this field for housing but it does strongly support my objection.

#### The reduction in the proportion of affordable housing from 40% in the deposit plan to 25% in the 2<sup>nd</sup>. modification

This is a complex subject area, which I do not claim to fully understand. However, there was a major change in policy between the Deposit Plan and the 2<sup>nd</sup>. modification. This despite a claim at a public meeting in Ballater by the vice convenor of the CNPA, Mr. Eric Baird, that the primary driver for the ultimate 250 houses proposed for Ballater was the need for more affordable housing. There is certainly strong support within the local community for more "affordable housing" primarily for

local people. However, the Plan makes no reference to the earlier Aberdeenshire Draft Local Plan, which the CPNA must have copies of. This identifies a number of sites within the village, which could be developed for, I understand, 20 housing units and another 5 Brownfield sites were also identified with significant potential for housing development.

However, it is notable that whilst the number of "Affordable Houses" appears to have reduced from 100 (40% of 250) to 62 (25% of 250) the number of private houses has increased. I cannot find a rationale for this. It is also my understanding that PAN 74 para 56 applies. This requires full consultation and approval by the authority responsible for strategy – in this case Aberdeenshire Council- and I am not aware this has been done. There was certainly not any meaningful attempt to consult within the community.

### **Housing Development in site H1**

I was advised by CNPA in response to my Deposit Plan objections that "the allocation of the site has been amended in light of comments received to better reflect both the needs of the games parking area, and also the ongoing work of the Prince's Foundation. To allow for the design approach proposed by the Foundation, an area of additional land has been included ". The perverse response to my objection 3 in the summary above has been to extend the proposal much further to the east with consequent impact on the landscape quite apart from impingement into an area of flood plain identified as having a greater than 1.200 chance of flooding in any one year according to SEPA maps and therefore according to SPP 7 para 37 table 3b - "Undeveloped and Sparsely Developed Areas – appropriate planning response -These areas are generally not suitable for additional development including residential". I cannot understand how CNPA could have ignored this although I do understand that the potential developer has commissioned his own report on flood risk and that SEPA will respond – hopefully with rigour if that report differs in its conclusions from their own.

However, my principal problem with the extension eastwards is covered by my summary objection 3 – landscape. There has been no further input by the Prince's Foundation at least not made available to the public. As far as I can ascertain their last report was that published in November 2006. It is somewhat disconcerting to find that the eventual eastward boundary proposed by the CNPA is that shown on p 26 of the Prince's Foundation report. That report however has little to say about the impact of their proposals on the wider landscape, preferring to concentrate on the landscape within the built environment which is quite consistent with its full title – The Prince's Foundation for the Built Environment". I am concerned that the CNPA plan as it is now should depend so much on an organisation from far out with the area and which is not directly accountable to the public. By all means refer to their concepts and select the good aspects of their proposals but it appears from their response to my original objection that they are depending fully on the Trust to develop the proposals for area H1 and the promised extra information from the Trust has not been forthcoming.

This is all the more disconcerting when one refers back to the Landscape Capacity for Housing report commissioned by the CNPA. That supports housing in the "contained fields" proposed by CPNA in the original Deposit Plan and this I suspect supports a contention that those responsible for preparing this plan were aware of the Landscape Report. I was not when I submitted my original objection but now find that I am in agreement with the main conclusions of that report.

This general concurrence with the Landscape Capacity for Housing report does also extend to its assessment for the fields added to the housing site proposal at the stage after the deposit plan. These fields are classified as "Cultivated Farmland".

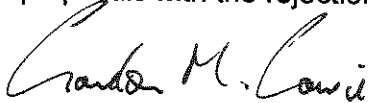
The relevant table is attached to this submission. In summary, this table identifies the sensitivities of the "Cultivated Farmland" as follows

Landscape Character and Experience	Very High Sensitivity
Settlement Form	High Sensitivity
Landscape Setting	High Sensitivity
Sense of Arrival	Low Sensitivity
Immediate Settlement Edge	High Sensitivity
Views and Visual Features	Very High Sensitivity

The report summary concludes

"Settlement expansion across the Cultivated Farmland is severely constrained by the importance of this area both in terms of its openness and its managed character, which contrasts with the enclosure of the surrounding hills, and the semi natural character of much of Deeside. Further development in this area also elongates the town and extends it away from its historic core and would feel increasingly perceptually detached from the settlement. Development would also be highly visible, in particular intruding in views along the length of the strath from the north."

This is so near my own opinion that I could have written it myself! I urge the Reporters to ask for a full copy of the "Cairngorms Landscape Capacity for Housing – Ballater" report and recommend that the CPNA revert to their original Deposit Plan proposals with the rejection of expansion further to the east.



Gordon M. Cowie  
21 April 2009

2.2

**Ballater: The sensitivity of the character areas to new housing development**

	<b>Cultivated Farmland</b>	<b>Elevated Grassland</b>	<b>Contained Fields</b>
<b>Landscape Character and Experience</b>	<p>Very High Sensitivity</p> <ul style="list-style-type: none"> <li>The openness of the strath, and the cultivated floor, offers a contrast with the wooded valley sides and the more semi natural landscape character which predominates along Deeside</li> <li>The space created by the cultivated strath also contributes to the appreciation of the sequence of different character types along the strath of the River Dee more generally</li> </ul>	<p>Very High Sensitivity</p> <ul style="list-style-type: none"> <li>The area of fine acidic grassland and parkland trees offers a distinctive contribution to local landscape character, which contrasts significantly with the adjacent woodland and farmland</li> </ul>	<p>Low Sensitivity</p> <ul style="list-style-type: none"> <li>The openness of these fields and the contribution it makes to the character of the wider strath is compromised by the enclosure created by existing development on three sides</li> </ul>
<b>Settlement Form</b>	<p>High Sensitivity</p> <ul style="list-style-type: none"> <li>The location and form of the settlement strongly relates to the southern end of the strath and further extension northwards would elongate the settlement away from the historic settlement core</li> </ul>	<p>High Sensitivity</p> <ul style="list-style-type: none"> <li>Development would elongate the settlement along the edge of the strath, away from the settlement core and link Ballater with outlying development to the north of Monaltrie House</li> </ul>	<p>Some Sensitivity</p> <ul style="list-style-type: none"> <li>The form of the settlement strongly relates to extending across the strath floor at this southern end, although the settlement is becoming increasingly elongated away from the historic core</li> </ul>
<b>Landscape Setting</b>	<p>High Sensitivity</p> <ul style="list-style-type: none"> <li>The open plain contributes to the setting of the town by providing a contrast in topography, scale and openness to the immediate setting of the town</li> </ul>	<p>Some Sensitivity</p> <ul style="list-style-type: none"> <li>The field contributes to the setting of Monaltrie House, but only locally to the setting of the settlement</li> </ul>	<p>Low Sensitivity</p> <ul style="list-style-type: none"> <li>The fields do not contribute widely to the setting of the town</li> </ul>
<b>Sense of Arrival</b>	<p>Low Sensitivity</p> <ul style="list-style-type: none"> <li>The sense of arrival is at its most pronounced where the settlement extends on both sides of the road at</li> </ul>	<p>Not Sensitive</p> <ul style="list-style-type: none"> <li>There is no sense of arrival affected by development within this area</li> </ul>	<p>Not Sensitive</p> <ul style="list-style-type: none"> <li>There is no sense of arrival affected by development within this area</li> </ul>

	the bridge, therefore expanding the settlement on one side of the road along these fields would not significantly affect the existing sense of arrival		
<b>Immediate Settlement Edge</b>	<p>High Sensitivity</p> <ul style="list-style-type: none"> <li>There are no existing natural features which could be used as a new settlement edge, therefore any extension would need to establish a new edge feature</li> </ul>	<p>Low Sensitivity</p> <ul style="list-style-type: none"> <li>This area has well defined boundaries, including established woodland and topography, all of which could be used as future settlement edges</li> </ul>	<p>Some Sensitivity</p> <ul style="list-style-type: none"> <li>This area has the potential to use change in level to create a settlement boundary, but this would need to be reinforced by other features</li> </ul>
<b>Views and Visual Features</b>	<p>Very High Sensitivity</p> <ul style="list-style-type: none"> <li>Development on the strath floor would be highly visible because of the openness of the setting</li> </ul>	<p>Some Sensitivity</p> <ul style="list-style-type: none"> <li>Development would be visible, but only relatively locally</li> </ul>	<p>High Sensitivity</p> <ul style="list-style-type: none"> <li>Development would be largely visually contained, although development within these fields may be visible in long views from the A93 to the north</li> <li>Views from the playing field along the strath would be obscured by new development</li> </ul>