

CNP LOCAL PLAN INQUIRY – SETTLEMENTS – BALLATER

RESPONSE TO CNPA STATEMENT OF CASE – Objector Ref 462

3.0 Summary of Objections.

The CNPA's summary of objections contains inconsistencies in the manner in which the CNPA have chosen to categorise objectors' submissions. In the case of my objection 462c, the CNPA have included details of my third objection to the Deposit Local Plan in 2007 (addressing housing density, employment and social problems) along with my third objection to the second modifications, dated 17th December 2008 (addressing 100 per cent affordable housing alternatives to H1). These two separate issues have been categorised under a single alphabetic suffix 'c' of my reference number.

There is potential for considerable difficulty for all concerned. It appears that the CNPA have chosen an almost entirely arbitrary basis on which to allocate these groups of objections without consistency, to various statements of case or hearing sessions. This must be a cause for some concern to anyone who wishes to ensure that all relevant bases for objection are aired.

For clarity, the text of my objection of 17th December 2008 is: "Third, I refer to page 43, policy 21, 2nd paragraph. In principle, I endorse the new statement that "Development solely for affordable housing will be favourably considered", if this is accompanied by withdrawal of site H1 for housing allocation. If site H1 is retained for housing allocation, then I object to the new statement, on the grounds that it implies the building of public sector housing which would be additional to the housing at site H1. With respect to the concept of "Development solely for affordable housing" I would urge the CNPA to apply more creative energy than has been evident so far to this approach to addressing the real housing issue that confronts Ballater, which is access to affordable housing for **local people**. I strongly suspect that the concept of "Development solely for affordable housing" could offer a more cost effective route (in terms of the net unit cost of affordable homes) to satisfying the needs of Ballater people for affordable housing than that achievable under the current CNPA strategy, which involves paying large public subsidies to a developer to damage the environment of Ballater by building houses which the Community does not need or want. Further, I believe that, if the concept of "Development solely for affordable housing" were combined with the removal of Ballater area H1 from the housing land allocation, and efforts were made vigorously to pursue opportunities for intelligent "brown field" and infill developments, then the recommendation by the Prince's Foundation of 28 September 2007, that "social housing should not be clustered in groups of more than about 5 units to avoid creation of social divides"

could be achieved more naturally than would be possible with mass development in area H1. It would also give the added benefit of resolving much of the public opposition regarding the housing proposals for Ballater, provided area H1 and the land beyond it is dedicated to amenity/recreational use in perpetuity”.

4.0 Summary of CNPA’s Response

I have submitted comprehensive comments on the Summary of CNPA’s Response in my response to the CNPA’s statement of case for Settlements – Ballater H1, which appears to be identical to the CNPA submission for this statement of case. There is no value in repeating these comments here.

8.4 Response to Objection 462c The CNPA have obviously confused their response to my objections under 462c with their responses to objection 091a; references to the possible inclusion of the Craigendarroch hotel and Crathie in the Ballater settlement are nothing to do with my objections.

This response relates to my objections 462c, which was lodged in response to the Deposit Local Plan in 2007. The details of my original objection are as given in the CNPA’s response under 8.4.

8.6 Response to Objection 462f My original objection was lodged in response to the Deposit Local Plan in 2007: “New housing development in the area and on the scale proposed in the Plan would close off the only remaining access route for wildlife (particularly deer) to move between Craigendarroch Hill and the fields bordering the route of the old railway line. At certain times of the year, deer have been observed on numerous occasions, usually at dusk, crossing ‘Field 3’ (which lies between Monaltrie House and Monaltrie Avenue, *en route* to the base of the hill. Although I have no expertise in this aspect of wildlife, I am concerned that changes of this nature do not comply with CNPA commitment “to conserve and enhance the natural and cultural heritage of the area.””

Notwithstanding the CNPA’s response to my objection 462f, I wish to expand my objection, by introducing, as further evidence in its support, details of the CNPA’s own report “Cairngorms Landscape Capacity for Housing Study 2005” (CNPA core document CD7.19) as a source of guidance on the H1 allocation proposal. This document offers the following recommendations and statements on development constraints and opportunities (quoted in full below). The recommendation in item 2 (bold text) is specifically relevant to my objection 462f:-

1. “Development within the Contained Fields offers the opportunity for relatively dense pattern of housing within a contained site which is readily accessible to the school, playing field and the centre of town.
2. **Woodland should be extended along the northern boundary of the site, and this could provide a strategically important link between Craigendarroch wood, the open space of the elevated grassland, the new planting adjacent to recent development to the east, and the River**

Dee, providing a strong settlement boundary along this northern side of the settlement.

3. Only the Contained Fields local character area was identified as appropriate for development. Development here was limited to the elevated land which lies adjacent to the playing field, which is well contained by the fabric of the existing settlement, and offers the opportunity to create a new settlement boundary where a clear change in gradient forms a bank across the adjacent field.
4. 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.
5. Development within the Elevated Grassland is limited by the distinctiveness and attractiveness of the character of this small but locally significant area. The parkland quality contributes to the setting of the Monaltrie House and offers a contrast to other character types within the immediate locality.”

The area of land proposed as suitable for development by this CNPA study report is approximately 3 hectares, to the north east of Monaltrie Park. Although the CNPA quote this report no less than 7 times in their statement of case, its recommendations have been completely flouted in the CNPA's current Local Plan, which now shows more than 16 hectares of farm land for development, a more than five-fold increase. Despite the fact that the Ballater community has stated its unequivocal desire to have this entire area retained for recreational / community use, by the majority of the population giving its support to a petition (discussed below) the CNPA should be requested to provide justification for this increase in development land allocation.