

40 DESCRIPTION OF ALTERNATIVES TO BALLATER H1

(a review of options for delivering affordable housing for local people)

A) Introduction

The DLP has proposed only one specific solution to the problem of affordable housing in Ballater – large scale development by a private developer of site H1, with a percentage of the housing to be affordable. We have demonstrated that H1 is not an effective means for delivering the required affordable housing, that it will aggravate the existing problem of holiday homes and second homes, and result in overdevelopment of Ballater. In our Statement of Case, paragraph 3.4.4, we pointed out that in paragraph 93 of SPP 3 of 2008 it is said that in some areas as an alternative to requiring developers to provide affordable housing “local authorities may need to consider more innovative approaches to delivering housing for those in need”.

There are a number of alternative options (both specific and generic) which we believe, in aggregate, could offer much of the capacity to deliver the needed affordable housing. They are described briefly below, in no particular order of priority. For each option, we include (where possible) notes in *italic* as to the CNPA’s formally recorded comments, or relevant statements in the DLP. There may be scenarios where a number of the options identified below can be used in combination.

It is implicit in many of these options that small scale developments would be involved, which may raise concerns about high unit costs. We note, however, that Appendix 4 of pages 50 and 51 of Heriot Watt’s report of 2008 (CD7.9, our document 17) effectively resolved such concerns. We note, also, that the distribution of small scale, totally affordable developments within and around Ballater, will help, more naturally than H1 development, to achieve the integration of affordable housing into the community in accordance with the Executive’s policy of achieving mixed sustainable communities as expressed in paragraph 40 of PAN 74 (CD4.20, our document 2), and to comply with the recommendation of the Prince’s Foundation that “Social housing should not be clustered in groups of more than 5 housing units to avoid the creation of social divides” (our document 40b).

B) Affordable Housing in the Countryside

The CNPA, in a planning meeting (Planning paper 5) on 7th May 2004 (see paragraphs 8 and 10, page 3 of our document 42), responded to the Executive's draft SPP on Planning for Rural Development:

- Re the purchase of Forestry Commission surplus land: *"This is an excellent idea and the CNPA suggests that there are other public bodies with landholdings that could give similar assistance...."*
- *"The case for creating greater opportunities for general and affordable housing plots in the countryside will be examined positively in the local plan process...."*

The DLP (CD6.13, our document 11) Policy 24 now states:

"Affordable Housing Outside Settlements

Developments for new affordable housing outside settlements will be considered favourably where there are no suitable sites within settlements where the development does not detract from the landscape setting, and/or they meet a demonstrable local need in the rural location".

Clearly, the CNPA's enthusiasm for affordable housing in rural locations has been eclipsed by a pre-occupation with concentration in Ballater H1. The reasoning behind this *volte-face* is obscure. We note that SPP15 (CD2.11, our document 1) supports rural housing through various options and mechanisms, including the purchase of Forestry Commission land, as does paragraph 21 of PAN 74 (CD4.20, our document 22). We note also an opportunity for the CNPA to engage with rural landowners through the Scottish and Rural Property Business Association.

C) Allocation of 100 Per Cent Affordable Housing Land

The CNPA, in planning meeting, 7th May 2004 (paragraph 7, page 2 of our document 42), made the following comments on the Executive's consultative draft SPP on Planning for Rural Development: *"The CNPA intends to allocate sites specifically for affordable housing and decisions on the scale and location of the provision will be made in the context of local need..."* The CNPA has not actually identified, in the current Local Plan, any allocations of

housing land in or around Ballater for 100 per cent affordable housing, as they appear to remain fixated with a private development at site H1. It is curious to note, however, that the Draft Local Plan, published in October 2005, identified three sites within the village, offering a total capacity of an estimated 21 affordable homes, **on the basis of focusing on local needs and in particular on affordable housing to rent.** Opportunities like these, which the CNPA has now apparently discarded, are supported in paragraph 18 of SPP15 (CD2.11, our document 1), paragraph 95 of SPP3 of 2008 (CD2.4, our document 19) and paragraph 29 of PAN 74 (CD4.20, our document 22).

We believe that the identification of small scale development opportunities for 100 per cent affordable housing would be a highly effective means for replacing the rather limited capacity of H1 for affordable housing, and it should be pursued by the CNPA with much more active vigour than is shown in the current Local Plan, where Policy 21 states, rather weakly: *“Development solely for affordable housing will be favourably considered”*.

D) Housing Allocation in Favour of Local People

The email message from Albyn Housing Association Ltd (our document 32) shows that the latest regulations allow a degree of preference for applicants with local connections when affordable housing for rent is allocated. The CNPA stated, at the above mentioned meeting on 7th May 2004 (our document 42, paragraph 9), that: *“The CNPA considers....its priorities will be to meet the need for affordable housing and general needs housing for people with established local connections and a contribution to make to the local economy”*. We support this sentiment expressed by the CNPA in 2004. We are disappointed that its manifestation in the DLP (CD6.13, our document 11) has become considerably diluted, in paragraph 5.48: *“The National Park Authority will continue to work with the relevant organisations within the Park to develop their allocations policies to ensure they are as responsive to the needs of individuals and communities in the Park as possible”*. We observe no initiative by the CNPA in this direction. We would therefore direct the CNPA’s attention to our documents 32, 39 and 48, on the subject of Local Lettings Initiatives and to our document 45 and pages 41 and 44 of Heriot Watt’s report of 2008 (CD7.9, our document 17).

E) Redevelopment/Refurbishment/Conversion/Brownfield Developments

By preferentially promoting the allocation of site H1, while virtually ignoring known opportunities for re-use of existing properties (whether residential or other) we believe the CNPA is in breach of paragraph 29 of SPP3 of 2003 (CD2.4, our document 18), which states that: “Planning authorities should therefore promote the re-use of previously developed land in preference to development on greenfield sites provided that a satisfactory residential environment can be created”. Paragraph 64 of SPP3 of 2008 (CD2.4, our document 19) states that “Re-development of brownfield sites for housing should be preferred to development on greenfield sites”.

The Prince’s Foundation, in a letter to the CNPA dated 27th September 2007 (our document 40b, first paragraph, page 2), stated: “We suggest that the Plan should also make reference to a section in the Design Guide that addresses the conversion and reuse of redundant buildings, as a simple, sustainable practice”.

We are aware also of Ballater-based studies that have identified specific potential opportunities for such development concepts. Details of findings are listed below.

F) Infill Developments

There are a number of individual land parcels in the village that could be suitable for development of small numbers of one or two bedroom affordable dwellings, if the land could be acquired at an appropriate price. Such sites are included in the list in section G below. This concept is promoted by paragraph 34 of SPP3 of 2003 (CD2.4, our document 18), which says “infill sites can often make a useful contribution to the supply of housing land”. Paragraph 67 of SPP3 of 2008 (CD2.4, our document 19) is to the same effect.

G) Summary of Specific Opportunities

The Consultative Draft Local Plan, dated October 2005 (CD6.9, our document 55), identified three infill sites within the village, offering the potential for 100 per cent affordable housing, with the capacity for up to 21 housing units:

- The corner of Craigview Road and North Deeside Road – 10 units
- The south east side of Craigview Road – 5 units
- Between Dee Street and the fire station – 6 units

For some unknown reason, these proposals have not been carried forward to the DLP. Previously, a review conducted by BRD Ltd revealed a number of other potential sites for small housing developments. These opportunities were pointed out on a tour of the sites to Messrs Brockie and Miles of the CNPA (by Messrs B Wright and G Inglis of BRD Ltd.) on 23rd August 2005. Some of the have already been re-developed, but the remaining sites and indicative estimates of and their capacities are listed below:

- Former gas storage area at Sluievannachie (brownfield) – 5 units
- Land at Sluievannachie (infill) – 10 units
- Old school grounds (infill) – 10 units
- Old school buildings (brownfield) – 10 units
- Former Legion hall and rifle range (brownfield) – 5 units

H) Conclusion

The potential options we have outlined above may well be capable of further extension. We would welcome an opportunity for, or evidence of sincere engagement between the CNPA, the Ballater community and other appropriate parties, in pursuit of the aim of providing access to affordable housing on a basis that is feasible, just and fair for all of Ballater.