

**PROPOSED PROPERTY RELOCATION FOR BALLATER FPS**  
**PROPOSED RELOCATION OF FIRE & POLICE DEPOT**  
**PROPOSED SITE FOR [TI]**  
**CALMVA PARK RELOCATION**



- Settlement Boundary
- Housing
- Economic Development
- Tourism
- Community
- Protected Open Space
- Town Centre Boundary
- Conservation Area

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**APRIL 2019 - BASED ON PREFERRED OPTION 3A BALLATER FPS FEASIBILITY STUDY BY RPS & MCELROY SMITH**  
**AS COMMENTS**  
**COUNCIL**

## CNPP Planning Group: Draft LDP 2020 policies – AC Comments 04 April 2019

Having reviewed the draft flooding sections of policy in reference to the current CNPP policy generally there is a shift from a relatively prescriptive policy to more a statement of principles (similar to how our own policy has been revised). Whilst this simplifies the policy and results in a document that reads very well, the apparent clarity actually lacks any substantial detail for us to refer to when applying policy.

More specifically we should draw attention to the following:-

1. The policy states 'All development should : be free from medium to high risk of flooding...' and then in the next paragraph, 'Where development is permitted in a Low to Medium or Medium to High risk area, water resilient materials and construction may be required'. There is no clarification of why development may be permitted in medium to High risk areas and this could lead to it being interpreted that use of water resilient materials and construction permits development in Medium to High risk areas.
2. There is no definition of Low/Medium/High flood risk. (Refer to note 10 below)
3. There is no reference to the SEPA flood risk maps.
4. The statement 'Developments should incorporate SuDS or other natural flood measures' is confusing as although SuDS can be a natural flood measure, they are not typically so, and Natural flood measures are not normally SuDS. It is unclear what is being asked for here, is it SuDS or Natural SuDS or Natural flood management (NFM) measures.
5. We welcome the presumption against culverting and note the requirement for 'an appropriately sized buffer strip', our requirement for the size of buffer strip is linked to maintenance requirements and often varies from that required for environmental reasons.
6. There is no exclusion of land raising and this can only be implied from the statement 'should not increase the risk of flooding elsewhere'
7. There is no mention of a requirement for safe access/egress to properties.
8. There is no reference to the Flood Risk Management Act.
9. There is no reference to SEPA's River Basin Management Plan (RBMP) and how the impact from pressures can be mitigated to maintain or improve the water quality for the River Dee, Gairn & Muick and the Special Area of conservation (SAC) that relates to the fresh water pearl mussels (FWPM), Salmonid (Salmon & Trout) and otters.
10. Aberdeenshire Council (AC) with their consultant RPS have completed a Ballater Flood Study Draft Feasibility Report (D03 – Feb 2019) presented to Stakeholder 27 March 2019. This study also includes detailed flood extent maps up to the 0.1%AEP (1 in 1000year RP event) with 1D & 2D fluvial (river) flood modelling based on detailed topographical and LiDAR surveys for Ballater Area covering around 7km River Dee and around 1.2km of the River Gairn and River Muick from their confluences with the Dee. The final Ballater Feasibility Flood study report (F01) is due for issue summer 2019.
11. The Ballater Flood study report can be used for assessing flood risk and any future planning applications where a flood risk assessment (FRA) would otherwise be necessary.
12. The preferred option (3A) detailed in Ballater Flood Study Draft Report (D03 – Feb 2019) refers to the relocation of the Caravan Park [T1], Fire station, Police Station and the Council Roads depot (near Ballater Royal Bridge) to a potential housing site [H1] as detailed in the Proposed Plan CNP LDP 2020 page 104 and as per attached sketch plan. As such we welcome discussions on possible inclusion of these properties within the H1 site.