

Roger Laird
Planning & Strategic Land Manager
Scotia Homes

1st May 2024

Dear Roger,

Having considered the content of the presentation you gave to the Housing Group on 15 April, 2024, the Community Council wishes to record its concerns with various aspects of the current proposals.

The majority of these concerns have been raised previously and it is disappointing that these concerns appear to have been ignored.

These are (being not exhaustive or in any particular order):

- The general layout is at odds with the prominent street pattern of Ballater which has streets running in a south west to north east direction. This proposal has turned the streets 90 degrees to run in a south east to north west direction. There appears to be no tangible justification as to why this has been adopted and does not integrate well with the adjoining streetscapes and looks uncomfortable when seen in the context of Ballater as a whole.
- The proposals acknowledge that the street pattern is meant to reflect the tight knit grid pattern of the historic core of Ballater. However, it is not felt that this is an appropriate justification for a site located on the edge of Ballater where existing street patterns are generally more fluid.
- The decision to run roads in a south east to north west direction means that the houses are generally orientated in the wrong direction for maximising solar gain. Coupled with this, the windows are very small and do not afford the opportunity for maximising natural daylight and utilising the path of the sun during the day to benefit as much as possible from natural resources, a core principle of The National Park. Notwithstanding that, natural daylight and sunlight are extremely important for wellbeing and it appears an opportunity is being missed to help to create better places for people to live.
- The layout is very road dominated with circa 800 linear meters of roads which either only have houses accessed off them on one side or no houses accessed off them at all. This is a highly inefficient layout both in terms of cost to construct and housing numbers which potentially could be increased leading no more affordable units being provided.
- The houses (95% of them) are not site specific to Ballater and are generic in their design and appearance being used on numerous sites throughout Scotland. The 1 ¾ storey height is out of character with the adjoining housing which are generally 1 ½ or single storey. The

elevation treatment and window placement and proportions are sporadic and confusing bearing no resemblance to the local vernacular or even a modern interpretation of it. The catslide dormer is not a feature appropriate for Ballater. The lack of entrance doors facing the street is not welcoming and creates bland street frontages and no sense of place. This site is in The National Park and deserves to be given more care and attention because of that.

- Concrete tiles are not considered an appropriate roof finish for the site or The National Park. It is felt the white render will dominate the streetscape and landscape setting and is not a colour prevalent within Ballater, leading to the development not integrating with its surroundings.
- The general dominance of the housing is of concern given that the site is being raised to around 1.5m above the existing field level. Coupled with the proposed finishing materials, it is unclear how the housing will integrate within the existing landscape setting and Ballater as a whole. 3D images were requested and promised previously but these are still awaited to allow a full assessment on this key point.
- The proposals are not compatible with the needs, aspirations or future viability of the Highland Games. Currently the proposals overlap circa 14m into the 55m extension to the Games Park agreed between Invercauld Estate and the Ballater Highland Games committee, recorded in a Minute of Agreement. Furthermore, the raised platform for the houses being 1-1.5m above the Games Park ground level may impact on emergency escape routes and accessibility along the east boundary.

The community is very much in favour of affordable housing and believes there is considerable demand for same. It is disappointed that the percentage of affordable housing has been reduced from 45% to 35% but it is appreciated that the developer will have arguments on viability and the community is prepared to concede this provided that the percentage of affordable housing is not reduced below 35% as now proposed in the application. The affordable housing should be a mixture of shared equity sales, outright sales at affordable prices agreed by Aberdeenshire Council and/or CNP, and social rented units.

Tenants and purchasers should be prohibited in terms of the Deed of Conditions for the development from letting or subletting and from making the properties available as holiday lets. In addition there should be provisions that require any properties purchased to continue to be affordable houses in perpetuity so that if a purchaser acquires a property at an "affordable" price then it must also be sold at an "affordable" price and any sale should require the consent of Aberdeenshire Council or the social housing provider who should set up a system to protect the affordable housing status on these properties. The homes which are leased to parties who have registered on the housing list should follow the same or similar letting criteria which were used for the Old School site in Ballater. The community would appreciate your acquiescing to these requests.

The Flood issues group's (FIG) understanding is that Envirocenter (the Scotia subcontractor) has completed a Flood risk assessment (FRA) on the basis that the proposed development is not on the functional floodplain (+ climate change) as defined by the latest available data i.e. Storm Frank. The expanded functional floodplain has resulted in a significant reduction (approx 50%) in the number of houses from what was initially envisaged.

We note however that the proposed development is immediately adjacent to the floodplain.

It appears that the elevated Deeside way plays a role in the definition of the floodplain but cannot be

assumed to be a formal flood defence and therefore the development must be designed assuming it does not exist. This is a puzzling contradiction for the lay man.

This results in the development (houses) being raised in the region of 1-2 meters depending on their location within the site.

We would ask that the technical authorities , ABCO/SEPA review the FRA (particularly SUDs and general drainage) to ensure that the flooding risk to the adjacent existing houses is not increased.

Additionally we would ask are there opportunities to in fact reduce the flood risk of the existing properties to the south of the H1 site by lowering the Deeside way ?

We believe that this might have the added benefit of simplifying the access to the site and perhaps reducing the amount of land needed at the games park. In addition we believe that being able to show that the new development could benefit the existing Pannanich Road development may increase community support for the development.

Ballter and Crathie Community Council