



The Prince's Foundation
FOR THE BUILT ENVIRONMENT

COPY

Local Plan/Policy Officer
Cairngorms National Park Authority
Ground Floor
Albert Memorial Hall
Station Square
Ballater
Aberdeenshire AB35 5Q

28th September 2007

Cairngorms National Park Deposit Local Plan
Comments and Objections

Dear Sir / Madam,

The Prince's Foundation for the Built Environment strongly supports the aims of the Local Plan and the vision that the National Park should become, 'an exemplar of sustainable development where people and place thrive together'. We welcome this opportunity to respond to the detail of the Deposit Local Plan.

The Prince's Foundation is an educational charity which exists to improve the quality of people's lives by teaching and practising timeless and ecological ways of planning, designing and building. In November 2006, together with community groups and other stakeholders, The Prince's Foundation for the Built Environment carried out an *Enquiry by Design* (EbD) workshop for the village of Ballater, which established a long-term vision for sustainable growth through broad consensus.

The following comments and objections relate to both the specific proposals for Ballater and to some of the wider policies and clauses of the Deposit Local Plan. Suggested modifications are included with our responses.



Sustainable Design Guide

We support the Park Authority's commitment to producing a ***Sustainable Design Guide*** for new development (1.19) as supplementary planning guidance, the purpose of which is, *to encourage new development and infrastructure to complement the built and landscape character of the Park and meet high standards of energy efficiency and sustainable design*. The design guide is referred to across a range of policies and we note that it is also intended to cover the use of materials as well as house extensions and alterations. 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. The Prince's Foundation would welcome the opportunity to further comment or contribute towards the Guide.

Building Materials and Skills

The second aim of the Cairngorms National Park is, *to promote sustainable use of natural resources of the area*. The Prince's Foundation strongly supports this aim as well as those policies which seek to ensure that construction materials will be appropriate to their setting and make a positive contribution to the special qualities of the Park. These policies are: Policy 7, *Landscape*, Policy 10, *Listed Buildings*, Policy 11, *Conservation Areas*, Policy 18, *Design Standards for New Development*, Policy 25, *Housing Development in Small Rural Settlements*, Policy 27, *Conversions of Existing Traditional and Vernacular Buildings*, and Policy 29, *House Extensions and Alterations*. In addition, Policy 17, *Sustainable Development*, pertains to the sustainable use of resources and the minimisation of climate change.

We recommend that the Sustainable Design Guide should set out detailed specification for the colour, texture and performance of stone types in certain areas, as well as appropriate usage. Many of the building stones traditionally used in the National Park reflect its rich geodiversity, for example the colour and texture of granite is quite different in Ballater than it is in Crathie, a few miles along the A93. These distinctions are important to the character and variety of settlements within the Park.

When building or repairing buildings in characteristically stone-built areas, difficulties in satisfying the above policies will arise from the lack of availability of appropriate roofing and walling materials, as well as prohibitive costs and the absence of commercial interest in extraction. This will necessitate the use of inappropriate alternatives. A solution to providing for these policies would be to support the opening of new small-scale quarries, which would also assist with the fourth aim of the Park, *to promote sustainable economic and social development of the area's communities*.

Unlike some other forms of extraction, the process of quarrying for dimensioned stone is necessarily careful in order to avoid damage of the material. Site noise and vehicular movement are also relatively low. Many of the former quarries in the Park from which stone was originally taken are now Sites of Special Scientific Interest, illustrating how these workings can easily be reclaimed as natural habitat and can have low visual impact.

The concept of 'snatch' quarrying, relates planning permission for extraction to a specific duration or needs basis, which may be a consideration where economically viable.

Significant development areas, as opposed to piecemeal growth, with sufficient allocation, may provide enough certainty and demand to make viable the opening or reopening of a quarry. The additional costs of using appropriate sustainable materials should be specifically noted under Policy 19, *Developer Contributions*.

We suggest that a specific clause under Policy 14, *Earth Resources*, be included to actively promote the extraction of dimensioned stone for local development and conservation use, provided that it minimises environmental impacts. In order to help reduce the cost of appropriate materials, and therefore increase usage, the extraction of stone for local uses should be exempt from *provision b*), that mineral developments will only be permitted: *where no suitable and reasonable alternatives to the material are available*.

In addition to the use of appropriate stone, the sustainable use of timber and other materials such as clay from within the Park for local construction purposes should also be encouraged, and provision accommodated where possible for local processing and working of these materials. Localised construction skills training as part of the larger development proposals should be encouraged as an additional benefit to the Park.

Housing

The Prince's Foundation appreciates the urgent need to address the shortage of affordable housing within the Park for the sake of both communities and businesses. The range of tenure options proposed will help bridge the divide between social rented and open market housing.

However, in setting the percentage of affordable housing required, consideration is needed not to exceed the ceiling at which the viability of private development is compromised and whereby the supply of housing is constrained as a result. Our experience elsewhere suggests that requirements for 50% or 30% (without any public subsidy) of affordable units may be too high. Also, given the primacy of the first aim of the Park- *to conserve and enhance the natural and cultural heritage of the area*- allowance should be made to ensure that an adequate proportion of a development budget is apportioned to the physical qualities of the built environment, using appropriate and sustainable materials.

As an additional policy we suggest that affordable housing be mixed, side-by-side with open market housing across the Park so that there is no visual distinction between different tenures; also, that **social housing should not be clustered in groups of more than about 5 units to avoid the creation of social divides**. This mixed-tenure approach has been shown to maintain the underlying value of affordable properties at a similar level to private equivalents and, anecdotally, to require less maintenance and management because of higher satisfaction levels amongst tenants and more cohesive communities.

Settlement Proposals

The delineation of the settlement proposals is in general an improvement over the last draft. An objection, however, is to the colour-coded distinction between use-types (community, economic development and housing), illustrated on the settlement maps. In order to promote vibrant, walkable, mixed-use communities, where residential, retail and business uses can coexist without segregation, we suggest that proposals should be simply designated as 'development areas'. The appropriate mix of uses might be stipulated on a percentage basis for larger development areas and settlements in the round (with perhaps a maximum for housing and a minimum for other uses). This would allow greater flexibility and sophistication in the design process and allow the Park Authority to assess proposals on their merits.

Ballater

The Prince's Foundation is committed to working alongside the Community, the CNPA, Scotia Homes, Invercauld Estate and other stakeholders in working to ensure that environmental and flooding concerns are carefully considered and that the aspirations of the Enquiry by Design workshop are rigorously followed with the aim of achieving exemplary standards of development.

The Enquiry by Design proposal was based primarily on an analysis of appropriate and sustainable physical form rather than an abstract time period. We understand that as the anticipated long-term timeframe of the EbD proposal exceeds that of the Park Plan, the allocation for site BL/H1 does not cover the entirety of the masterplan vision. In order, however, not to compromise the possibility of completing the full plan in the future, we recommend that the complete extent of the masterplan framework on site BL/H1 be safeguarded in outline for future development.

Based on the existing layout and pattern of buildings in Ballater, the suggested capacity of 250 units (p.72) is approximately the number that would be needed to establish development of a similar character. However, we would seek clarification in the Plan that these numbers would include provision for business units, shops and other uses.

In order to maximise wider benefits to the community, improvements to Monaltrie Park and ensure a quality public realm, sufficient critical mass will be needed in the initial, and most costly, stages of development. We therefore suggest that 90 houses in the first 5 years may be too low (Table 4, page 44).

We object to the zoning of site BL/ED2 for economic development for reasons as stated above and would suggest that future uses of site BL/ED1 are not necessarily restricted to business, particularly as these sites feature prominently on the riverside approach into Ballater and have the potential to make a more positive contribution to the street.

Representation

If there is a Public Local Inquiry we may wish to present evidence verbally. If others have objected to the same part of the plan we may be prepared to present a joint case at an Inquiry.

Yours faithfully,

Hank Dittmar
Chief Executive, The Prince's Foundation for the Built Environment