

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020

## RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

**This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.**

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 31 July 2020\*.

We recommend that you keep a copy of your representation for your own records.

*\*UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*

Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in a **separate response form for each issue you wish to raise.**

Please email or send the form to reach us by 31 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services  
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

## YOUR DETAILS

Title:	Mrs Jennifer Nicol
First Name:	Jennifer
Surname:	Nicol
Date:	1-7-2020
Postal Address:	[REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes  No

Are you responding on behalf of another person? Yes  No

If yes who are you representing?

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

An acknowledgement will be sent to this address soon after the close of consultation.

## Aberdeenshire Council Transcription

Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in a **separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 17 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services  
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

## YOUR DETAILS

Title:	Mrs
First Name:	Jennifer
Surname:	Nicol
Date:	01/07/2020
Postal Address:	
Postcode:	
Telephone Number:	
Email:	

Are you happy to receive future correspondence only by email? Yes  No

Are you responding on behalf of another person? Yes  No

If yes who are you representing?

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29th June 2020

Planning Policy Team,  
Infrastructure Services,  
Aberdeenshire Council,  
Woodhill House,  
Westburn Road,  
Aberdeen,  
AB16 5GB

Objection to the Proposed Local Development Plan 2021 for Potterton  
Reference: LDP2021NN

I would like to object to the proposed Local Development Plan for the changes in the village of Potterton. The proposed Local Development Plan would open us up to mass development and I do not wish for this to happen to the village of Potterton, allowing for a 50% increase in housing over 5 years, as well as a potential for the village to triple in size if this onslaught of building were to continue. I object to OP1 and OP2 and the destruction of greenbelt around the village of Potterton.


Lack of Community Engagement

I appreciate that due to the Covid19 pandemic, there has not been a public meeting with regards to the changes to be made to the village, but nevertheless, the community deserves more engagement than has been made accessible to them. Especially when this massive shift in the Local Development Plan for our area could be made to irrevocably change the future of this village.

Social exclusion due to lack of access to technology.

*"The digitally disadvantaged experience widening inequalities."* (Hernandez, K & Roberts, T, Leaving No One Behind in a Digital World, 2018). The COVID-19 pandemic has made the information completely inaccessible to many members of the community who have no access to appropriate technology. This is not apathy towards planning and development, but a lack of access to information.

Unjustifiable loss of Green Belt

Green Belt is supposed to be protected and should not be for  the purpose of housing development. The purpose of a Green Belt, as outlined in the Scottish Planning Policy (Scottish Government 2010) is *"to direct planned growth to the most appropriate locations and support regeneration and to protect and enhance the quality, character, landscape setting and identity."* This is not an appropriate location for this kind of development, and I believe our Green Belt here at Potterton should be protected. The areas around Potterton mentioned in the Local Development Plan are currently Green Belt areas, yet are to be changed into areas suitable for housing and this is unacceptable. This is an unjustifiable loss

### of Green Belt.

In the recommendations (Issues and Actions Papers relating to Issue 7 - Shaping Development in the Countryside), Policy R1 Special Rural Areas; states that only very minor changes to the Green Belt boundary are to be made to account for any new allocations arising from Settlement Issues and Actions papers, where required.

Under Green Belt Boundary within the document:

*"Comments made in respect of the green belt boundary should be considered at such time as a review is undertaken. It is recommended that only very minor changes to the green belt boundary should be made ahead of publication of the Proposed LDP to account for any recommendations arising from Issues and Actions papers related to settlements that require amendment to settlement boundaries to be made. Commitment should be given to reviewing the green belt in 2022 to inform a mid-term review of the LDP. The review would include public consultation utilising a range of engagement tools to ensure those with an interest can fully participate in the review."*

As a resident of Potterton, this is NOT a very minor change. It's not within the spirit of the above recommendation to continue with any of the sites, as they are all in Aberdeen green belt. However, they have been included in the Proposed Local Development Plan. Instead of waiting to review the green belt in 2022, this amendment appears to be being passed through in the Proposed Local Development Plan without community engagement and open public consultation.

### Inappropriate use of Greenbelt

The proposed area is classified as greenbelt and other sites are available in the local area which are not classified as green belt, such as the pre-approved site at Blackdog. Blackdog lies 1 mile to the east of Potterton, which has already been established as a site suitable for 600 houses and already has the roads infrastructure in place to cope with the extra road use. It could be argued that there are 600 houses planned for the site at Blackdog currently, within a mile of our village. Is there any need for an excess of housing in addition to this? As established by the Land Audit, there is currently 7.2 years of available housing within the Aberdeen Land area. This housing is not needed here. The changes to the Local Development Plan do not accurately depict the wishes of the community, who were relatively unaware that this mass development is in the pipeline.

### Ancient Woodland and Protected Species

The village has come together during the pandemic and has appreciated the green open spaces more than ever. The community is in danger of losing the character and identity of a fantastic village. We will lose our green spaces. Our environment and wildlife will suffer the

impact of woodland being destroyed. In the planning bid for OP1 and OP2, both ancient woodland and protected species were not indicated in the affirmative by the developer. There is ancient woodland bordering the sites. Within proximity, there are also standing stones and a cairn as historic interest. In the ancient woodland, there are badgers sets, nesting red squirrels and bats.

The ancient woodland should also not be used as part of the developer's green space in their bid, as this is not an amenity they should be allowed to market as part of green space.

### Sewage/Lack of infrastructure

When Old Croft Place, just north of Gourdiepark in Potterton, went through the planning process, there were multiple objections based on flood risk, as there are natural burns and bodies of water in the area. It is not accurate to say that there has not been any flooding in Potterton of recent times, as it has been in localised areas and needs to be considered on any development within Potterton. Drainage around newer sites such as Panmure Way, Gourdiepark and Gourdieburn have been problematic. It is concerning to note that OP1 and OP2 lie within SEPA's 1 in 200 year Flood Risk Area.

It is noted in the Strategic Environment Assessment report for Formartine that there would be localised impacts on watercourses during development, which is concerning when the sites border existing homes, Ancient Woodland and the protected species which live in the woodland.

There is insufficient capacity at Balmedie Waste Water Treatment Works for all the development in Potterton, Belhelvie, Balmedie and Newburgh included in the Proposed Local Development Plan.

### Biodiversity

Within the supporting document (Strategic Environmental Assessment of New Allocated Sites and Alternative Bids – Formartine.), there is a clear omission of information with regards to biodiversity. Other sites within the village refer to the negative impacts of Biodiversity as: *"Ythan Estuary, Sands of Forvie and Meikle Loch SPA and Sands of Forvie SAC are set to the north. This site is at a very close proximity to the qualifying sites and likely to have an impact on the qualifying species."*

The proximity to these areas of biodiversity is noted throughout the report for proposed sites around Potterton, but has been omitted for sites OP1 and OP2. Both OP1 and OP2 are within the same close proximity to *"qualifying sites"* and *"qualifying species"*. The Local Authority can not choose to use information for one proposed site but omit it for another, when the sites are all within the same close proximity.



As an example, it could be argued that Milton of Potterton neighbouring OP1 is in fact closer to Sands of Forvie than FR121 at Gourdiepark. (Milton of Potterton, the border of OP1 site is 13.3miles from Forvie Sands, whilst Gourdiepark is 14.1 miles away from Forvie Sands.) This is an inaccuracy of reporting by omission. This should also have been included when discussing biodiversity on OP1 and OP2.

"The village was originally located along Manse Road"

This is just factually incorrect within the Main Issues Report. The Church and the Manse have always been the centre of the village, as is true of most rural settlement. (These are two houses which are now known as The Auld Kirk and South Manse). But original Potterton village existed as the shop and four original houses next to it in the row. Manse Road didn't exist, several cottages/farmhouses, such as Mailen Cottage existed as part of Laingseat Farm, and Denhead Farm. Panmure Gardens from 1-9 were the next to be built in 1951/1952. The village was not originally located along Manse Road, and this can't be used to create the "settlement's sense of place" closer to desired sites of OP1 and OP2. It appears from this statement that the proposed Local Development Plan wants to favour that side of the village as a central point or hub, which in turn would allow for mass development.

I get irritated when I read in planning documents that there's no "sense of place" and "lack of identity" in our village, because it diminishes the experience of living here whilst equally appearing to market the Green Belt for development. Potterton has always been a community and the residents value it and take pride in it.

In light of Covid-19, Brexit and the housing market's over-reliance on oil and gas.

Crucially, we face an unpredictable economic recovery following the Covid-19 pandemic, and the reporting within the Proposed Local Development Plan will not be able to include the damage created by Covid in terms of human tragedy and the socioeconomic impact on Aberdeenshire. The reports are never going to be entirely current, and are based on establishing the need for housing for the future. However, it is important for Aberdeenshire Council to realise that these reports are beyond outdated for the current economic climate. As previously mentioned, there are 7.2 years of land supply availability for Aberdeenshire within the 2019 Housing Land Audit. This was before pandemic and before the drop in the oil price. The UK's oil and gas industry could lose as many as 30,000 jobs over the next 12-18 months, according to Oil and Gas UK. We can not ignore the impact those job losses will have on our area and the existing housing market.

*"Local economic performance is intrinsically linked to the performance of the oil and gas industry." (Aberdeenshire Council's Monitoring Report, Nov 2019)*

*“Local economy’s reliance on the oil and gas industry.” (Aberdeenshire Council’s Monitoring Report, Nov 2019)*

The Proposed Local Development Plan is setting 3000 houses in Formartine alone. It is impossible to fathom how the local authority can claim there is a justifiable need for this level of housing now. Indicative of this, is the ongoing halting of development, where new developments are halting after one phase of building rather than continuing with further phases. Today, at time of writing, there are 5163 properties available to buy on the ASPC website.

*“Until 2015 Aberdeenshire’s housing market had experienced a long period of growth, with high demand and steadily increasing house prices, resulting in a steady supply of new housing being delivered annually. Since the fall in oil price in 2014 and the resulting economic downturn, house prices have also fallen and the rate of housebuilding has decreased. The challenge now is to ensure that land allocations in the LDP continue to come forward in a less certain market to maintain an adequate housing land supply.” (Monitoring Report, Aberdeenshire Council, Nov 2019)*

The high demand and increasing house prices before 2015 is no longer relevant to the current economic climate, especially in relation to economic recovery following covid-19, the low oil price and Brexit. It could also be argued that there is an adequate housing land supply already, as shown in the 2019 Land Audit. The maintenance of an adequate supply should not include the destruction of green belt.

### Roads

There will be excessive traffic and noise, and an increased risk to all road users long term. The roads are not suitable for an additional number of houses. The trunk roads which connect to the AWPR were not upgraded, and are not set to be upgraded as per the Proposed Local Development Plan. The traffic risk assessments within the proposed Local Development Plan are completely inadequate and do not portray a real account of the rural roads around the village. It was established by Belhelvie Community Council that there should not be any development to the West of the village, due to the link roads to the B999, yet there seems to be a favoured response from Belhelvie Community Council for the East of the village. These are C class country roads, including single tracks, passing places, blind summits and narrow bends. It is entirely irresponsible to increase traffic on these roads, during building development and ongoing through a surge of new occupancy.

### Roads and Lack of Infrastructure



The transportation note within the Main Issues Report was completed by [REDACTED] on behalf of the developer of OP1 and OP2. Based on their findings, Potterton has an average of 1.7 cars per household. On that assumption, it would be an additional 396+ cars. However, within the transportation note, they consider no impact on the village from increased traffic, or increased construction traffic.

Within this transportation note, it accounts for Potterton having a 'frequent' bus service, however this needs to be corrected, as according to Local Bus Service Policy, Potterton has a timetabled service. (Frequent is less than 15 minutes intervals.)

Road safety is already a massive concern, without additional pressure on the roads surrounding Potterton. The transportation note lacks credibility as it does not accurately depict roads and transportation around the current settlement.

There is no investment planned for upgrading roads, schools or support facilities to cater for the increased population, especially the 25% of affordable housing allocation which is to include a large amount of social housing via a housing association. This is irresponsible, as there is a lack of infrastructure to support those with needs requiring local amenities to be available in the immediate vicinity of their homes. There is not an adequate bus service to support those most at need to reach services, such as pharmacies, doctor surgeries and local authority offices. The planning bid indicates that there is a frequent bus service, however this is incorrect. At best, the service levels here are considered to be timetabled. Frequent is less than 15 mins as stipulated in the Local Bus Service Policy, where as Potterton remains hourly/every other hour depending on mobility and location in the village.

Whilst the benefits of the AWPR linking to all major business parks in Dyce, Westhill & Altens are highlighted, Potterton has no direct bus services to any of these destinations. Also, almost all of Potterton's amenities are centered around Balmedie, and again, there are no direct bus services to Balmedie. The scale of this development WILL result in traffic loading due to lack of public infrastructure in bus services, as all residents will have to drive to access services. The Main Issues Report (on why bid site FR123, the old Wester Hatton tip was undevelopable) recognized that additional traffic loading onto the AWPR at this junction was not to be taken lightly. The Main Issues Report on bid site FR123, also identified concerns of forecasted traffic growth and a potential bottleneck to the Blackdog AWPR junction. The benefits of the AWPR will be diminished by development at Potterton. Again, this is an omission from the other bid sites, when it is relevant to all the sites mentioned for Potterton in the proposed Local Development Plan. It should have been included in all of them.

*"Arguments that it will contribute to forecast traffic growth at this location are not to be taken lightly if the function of the AWPR as a transport corridor, and not a development corridor, is to be delivered."* (Main Issues Report)

### Education

*"The Draft Proposed Local Development Plan (LDP) does not propose to include a specific allocation for a school. Aberdeenshire Council's Education and Children's Services are a stakeholder in the preparation of the Proposed LDP and have advised that, in the first instance, they would seek to extend or reconfigure the existing primary school, alongside a wider strategic approach to primary school education in south Formartine. However, we are committed to continuously engage with Aberdeenshire Council's Education and Children's Services on the capacity of Balmedie Primary School." (The Final Issues and Actions Report)*

*"The preferred sites provide no community facilities or services to address the planning objectives contained within the Vision." (The Final Issues and Actions Report)*

In the minutes provided by Belhelvie Community Council for 21<sup>st</sup> October 2019, under the planning section: *'The BCC highlighted their concerns that ongoing development is having on schools in area.'* Following on 18<sup>th</sup> November 2019, *"BCC will also report to ██████████ that in the initial plans there was a provision of a primary school and this has been removed at the request of Aberdeenshire Council."* with regards to a school at the Blackdog development 1 mile from Potterton village. Earlier in 2018, there was also a reply from I Downie, as shown in the minutes of the 20<sup>th</sup> August 2018: *'Concerned about the issue of primary school provision in the Balmedie Primary School catchment area. With so many major residential developments, and ██████████ looking to build 500 new homes, this is an acute problem as the existing school simply cannot continue to be considered capable of accommodating the pupil product.'* Ongoing concerns from the local community council have continued to be noted in their meetings, and yet the proposed LDP does not raise education provision as an overwhelming constraint.

Our local primary education at Balmedie Primary School is already struggling with over capacity and whilst Potterton is based in Aberdeenshire, children are transported to Bridge of Don Academy in Aberdeen City rather than remain within the local authority for secondary education. There is currently no provision made for children within Potterton to be transported to our local authority secondary school at Ellon Academy, therefore how can the local authority adequately support the education of more children within this area?

*"All residential development may be required to contribute towards additional primary school capacity." (pLDP)* - It is not appropriate to accept developers contributions as part of housing development and then address educational provision after the fact. Balmedie Primary is already predicted to be at 118% capacity within 5 years. This needs addressed before any new development should be considered within the entirety of the Balmedie Primary catchment area.

We will suffer from overcrowding of the village – roads, schools and infrastructure do not support becoming an Aberdeen 'suburb' and it could be argued that people chose to live and remain here because they liked living in a rural quiet village as opposed to a sprawling town space such as Bridge of Don.

Please consider this a representation of my objection to the Proposed Local Development Plan 2021.

Yours Sincerely,



# PRIVACY NOTICE

## LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: [dataprotection@aberdeenshire.gov.uk](mailto:dataprotection@aberdeenshire.gov.uk)

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
  - (i) Consent; or
  - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.