

**Comment on Proposed Local Development Plan****Page 1 - Summary****Pages 2 - 5 - Appendix of evidence****Summary**

We have been residents to the south side of, and on higher ground to OP1, since 2012 (residents of the first phase of two housing development phases). Since 2012 there have been 58 new houses already built immediately adjacent to OP1.

**We object to the newly allocated site of OP1, North of Forbes Park, Echt - for the following reasons:**

- **Flood risk - the area is subject to flooding beyond the protected land P2** identified to the north east of the site and so OP1 should not be identified as a site suitable for development (see appendix)
- **Lack of parking/community aspiration not fulfilled** - The MIR for Echt stated that **no bid has been received that seeks to deliver a car park, a recorded community aspiration for the village, still unfulfilled**. Development of OP1 will result in an increased demand for visitor parking in the village. The use of the access point, as connectivity to OP1, at Forbes Park which currently is laid out as a well used grassed amenity (that has been subject to resident factoring maintenance at the cost of Forbes Park phase 1 residents since 2012) will result in the loss of two well used visitor parking spaces.
- **Proximity to Facilities** - new settlements should be located near good transport corridors. The **development of OP1 will not minimise reliance on private car travel**. The Passenger Transport Unit have advised that even further to development of OP1, there is no prospect of increased public transport service through Echt.
- **Services and Infrastructure** - Scottish Water have confirmed on 17 June 2020 that the **Echt Waste Water Treatment Works is operating either at, or very close to capacity**, and whilst they are currently looking to carry out some small scale upgrades, Scottish Water have confirmed these works will not add capacity (email ref: CAS-1174666-Y1V4S CRM:027200001352 from [REDACTED], FOI officer, Scottish Water)
- **Education** - It was stated in the MIR report for Echt, that **Echt Primary School is difficult to extend and options to accommodate increased capacity are likely to be limited**. We have been advised by Aberdeenshire Council that further housing could put further pressure on the school depending upon the rate at which the development builds out. A site south of the main road was preferred by the planners at the MIR stage on the basis that it was "better located in proximity to the primary school and play park, avoiding the need to cross a main road". Extension of the school site into the bordering recreation ground would result in a loss of valuable amenity space, in a village bordered by main roads in all directions. The matter of restricted school expansion was intended to "be explored prior to the publication of the proposed LDP". OP1 should therefore not be considered a suitable site - we have no information on any challenge to these points made in the MIR.

**Further comment** - Should OP1 (Echt) be removed from the LDP as a site suitable for development, the **settlement boundary should be redrawn** to exclude this area from the Echt settlement area.

Further evidence is shown in the Appendix.

## Appendix - Further Background

### Flood risk

- Area OP1 is not flood resilient lying on a flood plain on heavy clay soils (see attached photographs showing extent of recent flooding adjacent to OP1);
- A landscape buffer and Flood Risk Assessment would not address the existing adjacent resident concerns that have been ongoing since the first phase of new housing was completed in 2012. These concern water-logging causing the failure and poor growth of new trees and the loss of successful private garden space, due to high water tables in winter months and heavy clay soils - of which the landowner was made aware in 2013;
- Raising houses on higher foundations will not protect residents' right to fully usable garden space, free from a high water table;
- It has been evidenced that adverse flooding effects do not "only have a short term impact", as evidenced eight years after the first housing development here was completed. Developers are required to ensure that landscape character is not significantly eroded and that soft landscaping will be successful to offset CO2 emissions and enhance the bio-diversity of the area;
- The phasing of new settlements needs to be given greater consideration in terms of how one phase affects the next phase of development. No development, or disruption to the site, should encroach on the mutual boundary of OP1 that formed part of an earlier greenspace/screening planning condition, not yet properly fulfilled after more than six years.

### Detailed evidence on flooding

The bid proposal for the site incorrectly states "there are no trees within or adjoining the site and only limited vegetation along the side of the ditch".

**There has, in fact, been a failure of trees on the north west boundary of OP1** that were finally planted in late 2016 by the developer under condition 3 of APP/2013/3472. The planning enforcement team have confirmed that there is evidence of some trees missing, some trees that had disease and some that required maintenance for preservation. These dead trees, should have by now, formed successful screening on this site OP1 as part of the adjacent development - COMP 2009/0311.

The areas these trees occupy should also form a protected area, and remain free of development. Existing landscaping features within development sites should be retained as a priority to provide links to public open space and buffer strips.

In the absence of any other evidenced reason, and with regard to the poor condition of the trees on our own phase 1 site access (that have also had to be replaced on more than one occasion under a lengthy complaint process), we believe that the tree failure is due to the seasonal water-logging of the soil and high water table adjacent to OP1 on this floodplain, that the proposed LDP has deemed suitable for further development.

**Historic landscape failure concerns should be given a higher priority in the environmental assessment of this site** and we are disappointed in the lack of accountability that allows unsuccessful landscaped amenity areas to persist. The complaint mechanism against the factor in our assigned maintenance contracts does not recognise any warranty obligations falling on the developer/landowner. Neither do developer provided NHBC warranties to residents protect any private ground from flooding beyond three meters from the outside wall of each home. There is therefore an unfair risk that residents yet again will be subject to boggy gardens and loss of successful amenity spaces that are the subject of any landscaping plan submitted, with regard to any future development on this site.

**Photographs showing extent of flooding closely adjacent to the existing first two phases of housing, north of Forbes Park, since 2012:**



**Lack of existing parking/loss of open space**

The development of OP1 will add to the issue of a lack of visitor car parking space in the village where the community aspiration for a car park has not been fulfilled. The MIR for Echt stated that one of the planning objectives was to provide additional parking provision to relieve pressure associated with the crossroads - where the Echt Church, Echt Hall, restaurant and Echt store are all located - visiting cars parked for funeral services, and for the local football club training and matches, habitually cause the main road near the crossroads to become congested - as evidenced in the minute of the Echt and Skene Community Council meeting dated 11 October 2017 - **“concern was expressed regarding lack of off-road parking facilities when there is a large scale event”**

The grassed field that OP1 occupies, is well used by locals for dog walking and recreational use with an open aspect to the landscape to the north. A “desire line for walkers” has been established and evidences its regular use as an important recreational space.

It has become evident that access to open space in rural communities has more importance during lockdown during the Covid pandemic, and a loss of the open aspect for the 58 houses already occupying this north eastern edge of the village will have an adverse impact on the well-being of its residents.

We believe development of this site will have an unacceptable effect on the landscape’s overall character and quality due to the cumulative impact of incremental development of what will be 83 new houses in the village since 2012 (should this development be completed).

Also, the proposal is not in line with the “linear pattern of local settlements” as historically the housing in Echt has been built either side of the main road, and around the crossroads.

**Proximity of facilities**

The development of OP1 will not minimise reliance on private car travel. 58 new housing units have already been built in the north east corner of the village in the last eight years - **another 25 homes will risk Echt becoming a car-dependent commuter estate**. The cycle routes to Westhill six miles away, to obtain essential provisions and services not provided locally, cannot realistically be seen as a safe alternative to private car commuting.

There is currently (post lockdown) only one return timetabled public transport fixed route bus services to our nearest town of Westhill, six miles away, and none at the weekend. The return bus journey is timetabled 12 hours after the outgoing bus service.

**It has been confirmed by the Passenger Transport Unit that the addition of 25 housing units will not guarantee an increase in public bus service provision.** The development would be anticipated to generate demand of only 1-2 additional public transport trips per day which, based on existing demand, which would not be sufficient to reverse previous decisions that have led to our previous services being withdrawn since 2012.

We are very much of the opinion that there is a disconnect between the advertised merits of occupying the developer’s new housing estate and a fair representation of the current and future position as regards proximity of facilities - the MIR bid proposal for Echt incorrectly indicates the area is “well served by regular public transport to Aberdeen and Alford along the B9119” - this is not a factual representation - Alford is not in fact not connected to Echt by a fixed route bus timetable. The advance notice A2B bus service (currently allowing only one passenger a trip, with no guarantee of availability, operating on a part time basis) will not adequately cater for a further increase in population numbers, when less dependency on private car use is to be promoted.

Also, although very much coveted as a local shop, Echt Store cannot realistically be touted as meeting all the provision supply requirements of an increased population that will be 83 houses larger (if phase 3 is successful against a finalised LDP) since the fixed route bus service for Echt, to Westhill and beyond, began to be withdrawn.

**Proximity of facilities** (continued)

In summary, in the absence of the developer making a commitment to the provision of funding to a new or enhanced bus service, then local housing development opportunities should only be proposed on the basis that there is ready access to public transport. Further development should be made in a more accessible area to the public transport network, and not in Echt.

In addition, **walking access to the school and playing fields to the south side of the B9119 would involve residents and children crossing a main road from this site.** The alternative site south of B9119, included in the MIR for Echt, was touted as the planners' preference for future development, rather than OP1. The existence of the two dummy access roads to OP1, established with the earlier phase 1 and 2 housing, cannot be fairly held to be a contributory reason for reversing that preference, when considering children's safety and the well established quiet zone north of B9119, inhabited largely by young families, since 2012.

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