

20 JUL 2020

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
First Name:	MARGARET
Surname:	PORTER
Date:	16.07.2020
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?

☐ 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:

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## YOUR DETAILS

Title:	Mrs
First Name:	Margaret
Surname:	Porter
Date:	16-07-2020
Postal Address:	
Postcode:	
Telephone Number:	
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Are you happy to receive future correspondence only by email? Yes ☐ No ☒

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## YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

**Modification that you wish to see** (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

LDP 2021 NN

**Reason for change:**

20 JUL 2020

Time is wearing on. There is still time to submit your objections to the Proposed Local Development Plan.

You may think: "It is not going to affect me."

It may not affect you YET, but sadly, if this all goes ahead, it will have a negative impact on all current residents in Potterton, as the traffic increases and we begin to live on a perpetual building site for years and years to come. Whilst this plan (on sites OP1 and OP2) would allow 230+ houses, the building may not stop there and would continue to engulf the village. As a community, of friends and neighbours, we can still pull together and get our objections noted by Aberdeenshire Council.

We have included some points to help with your own representations to Aberdeenshire Council's Proposed Local Development Plan. If you would like some help getting your thoughts down on paper, or have any points we need to hear about, then please get in touch.

Keep Potterton Green ([www.keeppottertongreen.com](http://www.keeppottertongreen.com))

Modification you would wish to see:

I would like to object to the Proposed Local Development Plan for the changes in 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 over 50% increase in housing over 5 years, as well as potential for the village to triple in size if this onslaught of building were to continue. I object to OP1, OP2 and the destruction of the green belt around the village of Potterton.

Reason for Change:

Inappropriate use of Greenbelt ✓

This is not an appropriate location for this kind of development, and the 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.

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 ✓

There are historical interests, such as cairns and standing stones. There are protected species in the area and ancient woodland. These should be protected from development.

Landscape Value

Within the Landscape Character Assessment of Aberdeen (Nicol, I et al, 1996), Potterton is acknowledged as a Landscape Character area and also states that "Large scale development would not fit in with the existing pattern" and should "allow existing areas of greenbelt to have some permanence."

Lack of Community Engagement

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.



In a recent LDP email update from Aberdeenshire Council, it was noted that there was an opportunity for an Officer from the Policy Team to attend a Community Council meeting virtually, however this has not been made available to the residents in Potterton.

#### Social Exclusion due to lack of access to technology

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.

#### Sewage/Lack of infrastructure

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.

Scottish Water are aware that there is a high water table at Potterton, with ongoing issues with drainage and run off, which the pumping station can not cope with. Additional development would not be suitable in the sites noted in the Proposed Local Development Plan.

#### "The village was originally located along Manse Road"

This is factually incorrect within the Main Issues Report. 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.

Planning documents claim that there's no "sense of place" and "lack of identity" in our village, but this diminishes the experience of living here whilst equally appearing to market the Green Belt for development. Potterton has always been a community and the resident's value it and take pride in it.

#### 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 13.3 miles from Forvie Sands, whilst Gourdiepark is 14.1 miles away from Forvie Sands.) This is an inaccuracy of reporting by omission. This should have been included when discussing biodiversity on OP1 and OP2.

Previous Local Development Plans

In the Submission of the Report of the Examination, dated 19<sup>th</sup> Dec 2016, planning reporters acknowledged that no modifications to the Green Belt were recommended in Potterton. Under Settlement Features, "*Paragraph 49 of Scottish Planning Policy identifies that a Green Belt should support the Spatial Strategy by directing development to the most appropriate locations, protecting and enhancing character, landscape setting and identity of a settlement and provide access to open space. It is appropriate to maintain the Green Belt around Potterton to support the vision for the settlement*". Potterton was excluded from Strategic Growth Area at this time.

*"No evidence has been provided to substantiate the concern that the long-term viability of existing services may be threatened unless growth is permitted. Even if this were the case, this would not be an adequate basis for permitting the large-scale growth being sought."*

In this time, nothing has changed that should allow such growth to be permitted in this village or within the Belhelvie area, therefore bid sites for large scale development should not have been included within the Proposed Local Development Plan for Potterton.

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. 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.

"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)

"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)

High demand for housing 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.

The high demand and the 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 and Lack of Infrastructure

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. 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.

The transportation note within the Main Issues Report was completed by RPS Ltd 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.

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 centred 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.

*"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

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.

*"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.