

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 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.*



ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

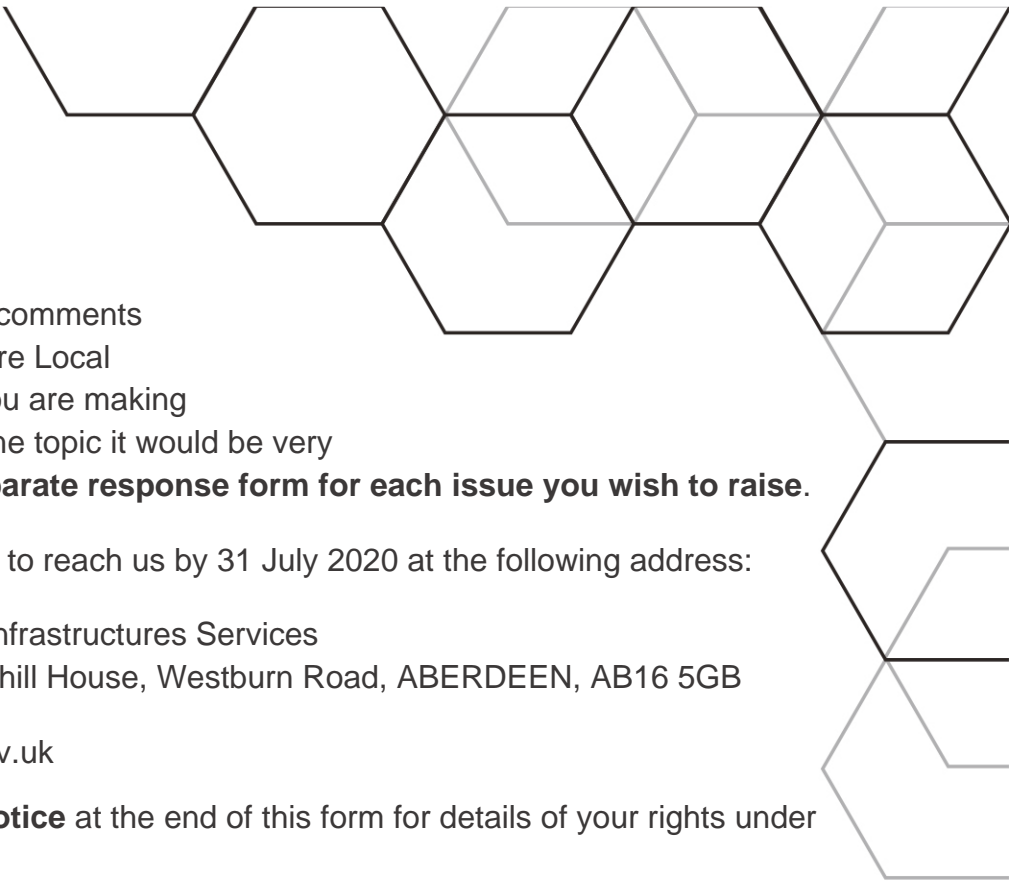
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.



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

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:	Kerry
Surname:	Dobby
Date:	25.07.20
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.

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

I would like to object to the Proposed Local Development Plan for the changes to Potterton. The Proposed Local Development Plan would open our village up to significant development and I do not wish this to happen to the village of Potterton. The changes allow increase of housing by 50% over five years that could also lead to the tripling in the size of the village with further increases following. 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. The Green Belt in Potterton should be protected. The areas around Potterton mentioned in the Local Development Plan are currently Green Belt areas which should not be changed and used for housing. This is an unacceptable use of Green Belt land.

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 historic interests such as cairns and standing stones. There are protected species in the area and ancient woodland. These need to be protected from a scheme as proposed.

Landscape Value:-

Within the Landscape Assessment of Aberdeen (Nicol, et al, 1996), Potterton is acknowledged as a Landscape 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 COVID-19 pandemic, there has not been a public meeting with regards to the changes to be made to the village. Nevertheless, the community deserves more engagement than has been made accessible to them. Especially when this massive shift in the Local Development Plan for the 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 of 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 in Potterton, with issue with drainage and run off, which the pumping station cannot cope with. Additionally 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 not allow for mass development.

Planning documents claim that there is 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 development. Potterton has always been a community and the residents value it and take pride in it.

Examples over last 36 months:-

Monthly 'pop-up' café – community led, food made and served by community, all funds raised put back into village projects.

Walking group

Orchard planted / flowers planted

Community indoor bowling group

Easter family Egg Hunt

Path improvement from Local Pub to Wooden Houses

Installation of solar lights on path

Christmas Tree for village with lights and carol singing

Knit and Natter Group

Craft club

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 Lock 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 of 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 cannot 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 close to Sands of Forvie than FV121 at Gourdie Park. (Milton of Potterton, the border of OP1 site is 13.3 miles from Forvie Sands, whilst Groudie Park is 14.1 miles away from Forvie Sands.) This is an inaccuracy of reporting by omission. This should have been concluded when discussing biodiversity on OP1 and OP2.

Previous Local Development Plans:-

In the submission of the report of the examination, dated 19th December 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 provides access to open space. It is appropriate to maintain the Green Belt around Potterton to support the vision for 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 base 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 markets 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 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 cannot ignore the impact those job losses will have on our area and existing housing market. The proposed Local Development Plan is setting 3,000 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 Councils Monitoring Report November 2019)

“Local economies reliance on the Oil and Gas Industry.” (Aberdeenshire Councils monitoring report November 2019)

“Until 2015 Aberdeenshire’s housing market had experienced a long period of growth, with high demand and steadily increasing housing 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 house building had decreased. The challenge is now to ensure that land allocations in the LDP continue to come forward in a less certain market to maintain adequate housing land supply.” (Monitoring Report, Aberdeenshire Council, November 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 low Oil price and Brexit. It could also be argued that there is an adequate housing land supply already, as show in the 2019 Land Audit. The maintenance of and adequate supply should not include the destruction of Green Belt.

Road 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 Issue 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, Potterton has a timetable service. (Frequent is less than 15 minute intervals).

Road safety is a significant 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 and Altens are highlighted, Potterton has no direct bus service to any of these destinations. Also, almost all of Pottertons amenities are centred around Balmendie and again, there are not 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 Western Hatton Tip was undevelopable) recognised that additional traffic loading on to 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 bottle neck 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 developer’s contributions as part of a housing development and then address educational provision after the fact. Balmedie Primary is already predicated 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.

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

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.

