## PP0798

Comments on proposed Aberdeenshire Local Development Plan 2020.

## YOUR DETAILS:

Title:	Ms
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Date:	31-07-2020
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Are you happy to receive future correspondence only by email? Yes Would you like to subscribe to the Aberdeenshire LDP eNewsletter? No

Are you responding on behalf of another person? Yes If yes, who are you representing? Ms Kate Brownlie

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

#### YOUR COMMENTS

# Modification that you wish to see:

Ref LDP2021NN - Please remove Potterton from the Strategic Growth Area and from promoting growth in the Energetica Corridor on Page 19 para 5.14. Please remove the Community Hall, the Business Units and the word "Contemporary" to describe the settlement from the Potterton vision statement. Change the Flood Risk from Small Watercourse to Large Watercourse. In the Potterton vision remove the word "contribute to" preserving the amenity and change back to "The planning objective for the settlement is to preserve the amenity of the village, which shall be achieved through the use of protected land designations and through the application of the greenbelt policy." Reinstate the Greenbelt Designation on both proposed sites. The proposed sites do not meet the criteria for Effective land it is constrained land and should be removed from the local development plan. Remove the Ancient Woodland as a provision for Open space and remove it as enhancing biodiversity. Remove the "should be in keeping with other nearby residential development" from the housing design. Remove the core path they state is in close proximity. Remove the words "should provide connectivity" to the existing settlement. I object to both OP1, OP2 and the destruction of the green belt around Potterton.

# Reason for change:

I would like to object to the Proposed Local Development Plan for the changes in Potterton. The Proposed Local Development Plan would open the village up to mass development and I do not wish for this to happen; this would allow 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. This will destroy the character of the village.

# Previous Local Development Plans

In the Submission of the Report of the Examination, dated 19th 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."

# Incorrect growth area allocation

The Housing Land Allocation [Appendix 06: Housing Land Allocations, pg5] incorrectly allocates Potterton as a strategic growth area; Settlement Statements states that Potterton is "out-with the Aberdeen to Peterhead Strategic Growth Area" [Appendix 7C: Settlements Statement Formartine, pg90-91] and therefore falls under Local Growth Area. The magnitude of the proposed development to the area is inappropriate for a local growth area, where developments should cater to local needs and small scale development only. Potterton does not meet the criteria of a Strategic Growth Area and does not have the infrastructure or planned investment to support it. Page 9 para 1.4 also states also states that "Appendix 7. Settlement Statements, and outlines the way in which councils would wish to see an allocation to be delivered." The Potterton Settlement Statement clearly states it is out with the Aberdeen to Peterhead Strategic Growth Area so this should be taken as the view of the council on how the allocation should be viewed, in which case the development is not suitable for a local growth area as not local needs have been identified. In addition, this is greenbelt land and is contrary to its purpose to prevent development of inappropriate scale and form, which is what this development will result in. It constitutes urban sprawl.

(This was also the view of the Scottish Government independent reporter (DPEA) who rejected mass scale development in Potterton during the last LDP on the basis that it was not in the Strategic Growth Area)

### Landscape

Potterton House and its designed landscape, which the ancient woodland and Woodside Cottage formed part of, along with the ridge and furrow present in the adjacent field, which is being proposed for development forms a significant feature of the local landscape, which should be protected. All of these monuments have sat in situ since the early 1500's looking up to the Kirk in the village of Potterton before any housing estates were present, this is a sensitive area of landscape, which represents a historical reference to our past, protecting this is vital in preserving our sense of the place. It would be inappropriate to build contemporary housing up to boundary, which does not fit with the pattern of our community in Milton of Potterton. All of the Potterton House Policies can be found on Canmore. I object to the loss of this history, our identify as a unique community in our own right and the loss of our sense of character by speculative

developers. Contemporary development is not appropriate in this landscape siting.

https://canmore.org.uk/search/site?SIMPLE\_KEYWORD=Potterton%20House %20Policies

# Drainage /Flood risk

The proposed developments will be built on bedrock of the Belhelvie troctolite basic intrusion which is impermeable to water, overlain by the glacial Hatton Till Formation which will also be considerably less permeable than the Kippet Hills Gravels found to the north of the sites. This makes the drainage poor and causes huge amounts of water to run off from the fields down towards Potterton House. The trees which form part of the designed landscape of Potterton House were planted to help alleviate and prevent flooding of the grounds and monument-status buildings on the property. The development will only exacerbate this issue further with the addition of impermeable tarmac and concrete surfaces, and therefore poses a huge risk to the surrounding properties and their foundations as the current drains are already all too often overwhelmed just by the quantities of rainfall the area receives. In particular, the Coach House, which is the lowest-sitting property in the area will be flooded if this issue is not properly addressed.

# **Endangered and Protected species**

We have several endangered species including badgers, bats and Red squirrels adjacent to the proposed sites. Red squirrels and their dreys are protected by the Wildlife and Countryside Act 1981(as amended) and by the Nature Conservation Act 2004.

"It is an offence to intentionally or recklessly:

- disturb a red squirrel in a drey;
- damage, destroy or obstruct access to a red squirrel drey."

Enormous efforts have been made over the last 8 years to successfully reintroduce and rebuild red squirrel populations to the woodland areas of Potterton House; red squirrels are a priority species in the UK Biodiversity Action Plan and, under Scottish Natural Heritage development guidance, development proposals must obtain an SNH license if development works are within 50m of active dreys - area OP1 certainly falls within 50m of the Potterton House grounds. This development runs the risk of committing offences under the above acts if these issues are not properly addressed (further development guidance can be found on the Scottish Natural Heritage website).

# Coalescence

The development is within Greenbelt and is of an inappropriate scale, it will cause a loss of greenspace which currently defines a clear level of separation between Potterton House estate (which is within the Milton of Potterton community) and the village. This development will subsequently connect the village settlement to that of our satellite community causing coalescence.

#### Limiting access to rural Space and limiting active travel

The development will add 100's of additional car journeys to already narrow, poorly underpinned and over-run c-class roads. This will make it unsafe and limit our ability to walk safely into the village and connect to other points around the area as we do today. In the case that funds were made available by the developers for additional bus services to accommodate an increased population, this would only make the road situation worse.

The pinch-point which connects Milton of Potterton to the village is an unavoidable constraint as the road is already too narrow to accommodate a car and vehicle passing safely at the same time, and does not allow for a right-hand turn onto the route along to the AWPR.

Further to this, the road which connects Milton of Potterton to the AWPR is not a suitable alternative for bus routes; the traffic load and speed of traffic already pose a considerable safety risk to residents and, again, has narrow sections which already struggle to accommodate larger vehicles passing cars safely. The road restriction on this route, which the council insisted on as part of the previous planning application, should also be reinstated as this is a pressing safety issue to residents - especially those with young children and animals.

## **Emissions**

Potterton has limited public transport which does not connect directly to major industrial areas. This will result in 100's of additional car journeys increasing emissions at a time when we should be reducing our carbon footprint. Our amenities are centred around Balmedie with no direct bus service, which will add even more car journeys to the roads. The school bus is at capacity so additional busses would be required to accommodate new children, adding yet more emissions.

#### Roads Farm Traffic

Due to the Potterton being surrounded by prime agricultural land including the proposed development sites, we have to accommodate a large volume of farm traffic on our already challenging roads. The proposed sites which are currently put to good use as grazing land are directly adjacent to where heavy farm machinery exits fields for crops for food production. It is unsafe to develop on mass scale next to sites where we have continued seasonal farming traffic.

#### Community Hall

The community has not been consulted or engaged publicly about this development and it has passed through the Main Issues stage with no public scrutiny, allowing it to get into the Proposed development plan. There has been no consultation about the desire for a new community centre and we already have a community hall. Please have this removed from the vision statement as it's a false statement.

## Business Units/Energetica Corridor

Remove the identified preference for business units as they're has been nothing provided to demonstrate this nor has it been put through any public consultation. It cannot be used to promote the Energetica Corridor. There is no employment land allocation in Potterton so it should be removed. Potterton does not show on the Energetica corridor for Housing either so please remove it.

# **Ancient Woodland**

Remove the Ancient woodland as a provision of open space within the development. This is private land which does not belong to the developer and should be removed. There is scant provision for the protection of the woods and the development risks its preservation.

#### Negative Biodiversity

This site will result in negative biodiversity to nearby qualifying sites like forvie sands.

# Core Path

There is no core path in close proximity to the ancient woodland - it is located much further away and has poor connectivity to this woodland.

# Connectivity

The sites are remote from the village and local amenities. This will result in increased traffic through the village and there are no cycle paths.