

10 AUG 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

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:	DOREEN
Surname:	CASSÉLL
Date:	29.7.20
Postal Address:	[REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	- N/A.

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**.

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YOUR DETAILS

Title:	Mrs
First Name:	Doreen
Surname:	Cassell
Date:	29-7-20
Postal Address:	
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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):

Appendix 7C Settlement Statements – Formartine: Potterton section – P. 476 onwards

We wish to see the removal of OP1 and OP2 from the LDP for Potterton and the reinstatement of this land as Green Belt.

We wish the Vision for Potterton as shown on Page 476 of the Proposed LDP (both paragraphs) to be removed, as it contains several incorrect and misleading statements, and to be replaced with the following wording in line with previous Plans:

'Potterton is a small village set in gently rolling farmland and located in the Aberdeen Housing Market and the Aberdeen Green Belt. Potterton is outwith the Aberdeen to Peterhead Strategic Growth Area.

The village is dominated by two large housing areas, one comprising wooden bungalows and the other simple mid 20th century bungalows. A small number of traditional granite style cottages are located along the main street, along with a traditional granite church and manse house. All housing is 1-1/2 story. The village is surrounded by green belt, while a large protected area, including playing fields, is located within the settlement. The village has a limited number of services typical of a small community, including a pub, a community hall, a shop/Post Office, and business units located in the west of the settlement.

The planning objective is to preserve the amenity of the village.'

Appendix 6 Housing Land Allocations P.169 Table 2: We want Strategic Growth Area Allocations as shown in the table for Potterton to be removed.

Proposed Local Development Plan 2020 – Introduction and Policies: Aberdeen to Peterhead Strategic Growth Area P.19 para 5.14: We want the reference to development in Potterton included to promote the Energetica Corridor to be removed.

Reason for change:

Inappropriate use of Green Belt land and lack of consultation:

Housing development is not an appropriate use of green belt land. There is a limited list of types of development which may be permitted on green belt land and housing development is not one of them. In order to allow the bids from Barratts to be included in the LDP, the relevant land has been removed from the Green Belt in between Local Development Plans, with no prior consultation with local people and no notification that this had happened. But Council documentation states that only very minor changes to the green belt boundary should be made between LDPs, and that commitment should be given to reviewing the green belt in 2022 including full public consultation. The change which has been made to the Green Belt at Potterton is absolutely not a 'minor change' and has been made with no public consultation at all. However, Aberdeenshire Council says that it is committed to public engagement and consultation in the plan-making process. Since the proposed developments are not permitted on green belt land and there has been no consultation on the change of status of the land from green belt, they should be removed from the LDP. Also, the Green Belt designation on the affected fields separates the small settlement of Milton of Potterton, where we live, from the main village of Potterton, and so prevents the village being extended by sprawl and destroying the character of Milton of Potterton.

Vision for Potterton

The Vision for Potterton as shown on P. 476 of the Proposed LDP contains several incorrect and misleading statements. It refers to a settlement contemporary in nature and omits the description previously shown of the housing as being 1 to 1 1/2 stories high. However, Potterton is still a small rural village. The boundaries of the village are based on farms and the housing is 1 to 1 1/2 stories high because this fits in with the historical buildings being mainly farm steadings etc.

We wish to see the planning objective for the village reinstated to say 'to preserve the amenity of the village'. This will be preserved by reinstating the green belt to preserve our landscape setting and green space and by removing the proposed housing developments from the LDP.

Potterton is a village of only around 400 houses. To build another 230+ houses would completely change the nature and character of the place.

We also wish to see removal of the sentences claiming that the community wants a new community hall and small business units. Our community has not been consulted on whether we would wish to exchange our rural setting and Green Belt status for a community hall. There is no evidence whatsoever of any sort of public engagement on this question. Also, the reference to small business units should be removed. Again there has been no consultation on this and it is an erroneous claim. There is no need for land to be allocated for business use on Green Belt land and none has been allocated in the proposed LDP. We believe both of these false claims have been made by prospective developers to try to justify inclusion of development in the village.

Strategic Growth Area / Housing Land Allocations / Energetica Corridor

The Proposed LDP shows housing land is being allocated to Potterton as part of the Strategic Growth Area and to promote the Energetica corridor. This should be removed. Potterton is not located within the Strategic Growth Area and so any future housing for Potterton should be only as required to meet local needs. According to the Housing Land Audit 2019 and the Monitoring Report there is already a generous supply of housing land allocated in Formartine (over 7 years supply, well in excess of the 5 years required), so lack of housing land supply cannot be the justification for releasing green belt land. The Strategic Development Plan at para 6.9 states: 'The green belt around Aberdeen will continue to protect the character and landscape setting of the City and make sure that development is directed to appropriate locations. It will do so whilst **protecting the most**

Important undeveloped areas that contribute to the environment and provide the City with its setting.....Local Development Plans should **promote recreational access, landscape improvement and habitat enhancement within green belt areas and beyond.** Aberdeenshire Council should recognise that the Green Belt around Potterton is a precious resource and should be protected.

The Strategic Development Plan states that Energetica is 'A development initiative between Aberdeen and Peterhead to create a world-class business and residential location **within a high-quality environmental setting.** The Green Belt is an important part of maintaining the high-quality environmental setting which exists in this area. Removing the Green Belt to build houses does not help to promote the aims of Energetica. The Strategic Development Plan also defines the Green Belt as 'An area of countryside **where strict planning controls are in place to protect landscape setting, maintain the identity of a place and provide land for recreation.**' These planning controls should prevent the destruction of the landscape setting of Potterton and Milton of Potterton.

Constraints

Aside from the above-mentioned issues there are significant constraints which must prevent housebuilding in this area:

Roads: The site would have access points on to an unclassified road and a C class road. The LDP states that there would be access on to the B977 – this is an error, both roads are C class or unclassified roads. These existing roads are already inadequate to cope with current traffic levels which have increased due to the opening of the AWPR.

Aberdeenshire Council Roads department have been made aware of this. The inadequacies of the road network around Potterton have been well known for many years. Several years ago, traffic calming measures were introduced in the village of Potterton (between the proposed development and the B999). When the Wester Hatton landfill site was developed for landfill, access to and from the site in the direction of Potterton was prevented. When the AWPR was under construction, the construction traffic was directed not to go through the village. And yet you are proposing to put possibly an extra 400 cars which will come with more than 230 extra houses on to these small country roads, not to mention all the necessary construction traffic. The roads are used by pedestrians, cyclists and horse riders and are becoming increasingly risky for people to use. There are no passing places, footpaths, or streetlights and few road markings. There are bends and blind summits as well as a significant stretch which is only suitable for single file traffic. My husband and I are elderly and live on the unclassified road on the stretch only suitable for single file traffic. Our driveway is used as a passing place by cars and heavy vehicles. It is too dangerous for us to walk on the road, which means we are confined to our house and garden. It is too dangerous for us to do any maintenance work to our boundary wall and fence due to the fact that the verge has been completely eroded by heavy traffic. My husband used to maintain our grass verge by mowing with a lawnmower but there is nothing left of it now. It is certainly not sensible to do anything which would increase the level of traffic on this road. Also in the winter if there is drifting snow with the wind coming coming in the wrong direction, the snow is blown down off the hill onto the road and it can become impassable very quickly.

Drainage/Flood Risk: The fields proposed for development flood in periods of rain and are flagged by SEPA as a 1 in 200 flood risk area. The Aberdeenshire Flood Risk Assessment (April 2020) states that Category 3 Areas (1 in 200) outwith settlements are generally not suitable for additional development including residential development. OP1 and OP2 are outwith the boundary of the settlement of Potterton. Therefore they should not be built on and OP1 and OP2 should be removed from the LDP. The geology of both fields proposed for development is on bedrock which is impermeable to water. Therefore the drainage is very poor, and depressions in the land flood during heavy rain. There are

areas at risk on the proposed site including dips in the ground which currently fill with water and areas of swampy ground with reeds. This problem would be increased by buildings and hard surfaces which would not allow drainage of water into the soil during heavy rains. I believe this would endanger the existing homes in the small settlement of Milton of Potterton, including our own home [REDACTED] which lies lower down than the fields proposed for development. This is a real concern for us, especially with increases in flooding being seen around the country due to climate change. This is recognised in para 6.2 of the Strategic Development Plan which states 'Development which avoids areas of flood risk...will be important in adapting to climate change.' These fields are in an area of flood risk and should not be built on.

In the area the water table is high and there are natural springs. There are problems with drainage and run off from the fields in periods of heavy rain. The road junction at Mill of Potterton can flood after even a short period of heavy rain.

Waste Water: There is insufficient capacity in the current sewage system for more development. The upgraded Potterton sewage system is working at capacity and regularly fails: the drainage pumping system gets swamped during periods of heavy rain and causes pollution to the Potterton Burn. This has happened within the last few weeks, with SEPA being called out. Scottish Water have stated that there is no proposed project to provide additional capacity at the Potterton pumping station. There is also insufficient capacity at Balmedie Water Treatment Works to treat all the development sites allocated in Balmedie, Belhelvie, Newburgh and Potterton.

Contamination: The document 'FR140 Land North of Denview Road Potterton Bid Site Assessment' and the similar one for FR141 prepared by Aberdeenshire Council planning department states that the site may be on contaminated land. OP1 and OP2 have been used as grazing land for sheep for the past many years. OP1 and OP2 are in close proximity to the Wester Hatton Landfill Site which is producing methane which may have contaminated the land. It would be dangerous to build houses so close to the landfill site.

Infrastructure: as well as roads and waste water systems being inadequate to cope with any expansion of Potterton, there are other infrastructure problems:

Local schools are at capacity or over capacity already. The local medical practice is also working at full tilt already. No additional facilities are included in the development plan.

AWPR: The Strategic Development Plan states that LDPs should expressly avoid any new development that would result in a negative impact on the Aberdeen Western Peripheral Route or any junction, in order to lock in the transport benefits created by the road, and to ensure that the capacity of the route, and its junctions, is not negatively affected by development. It says any new development adjacent to the Aberdeen Western Peripheral Route will be resisted. The AWPR junction was not created to cope with huge development in Potterton and this would negatively impact it. Therefore there should not be development in Potterton which would funnel a huge increase in traffic to that junction. Neither should the huge increase in traffic be channelled through the traffic calming measures in the village and down onto the B999 as these roads cannot cope with extra traffic either.

Public Transport: The bus service through this area is infrequent (2 hourly during the day during the week, and less in the evenings and on Sundays) and frequently runs late. If there is any risk of bad weather including snow, heavy rain or ice, the local bus service (291) bypasses this part of the route altogether (going down the B999 straight to Aberdeen, instead of through Belhelvie, Milton of Potterton and past Denview) and sometimes there is no bus service at all for several days or more at a time. The reasoning behind this is presumably because the roads are so bad, to reduce the risks of buses having accidents or getting stuck and blocking the roads. The bus service only links us to the centre of Aberdeen. There is no service at all to link to areas where local services are located e.g. Balmedie and Dyce. So all of the new houses would mean more cars on the road if people are to be able to get about to get to work and access services.

Impact on Biodiversity and Protected Species

The Scottish Government recognises the importance of maintaining and improving habitats for wildlife. Farmland is an important habitat for many types of wildlife including many species of birds which are threatened, and which are found here – including grey partridge, lapwing, kestrels, swifts and skylarks. These birds would be lost if the fields which form their habitat are turned into housing estates. As well as birds, many other types of wildlife are found here and would be negatively impacted by housing development, including badgers, bats, deer, common lizards and red squirrels which are breeding in the area – one has been visiting our garden in the last few weeks. Many of these species are protected by law. There is also an ancient woodland which would be impacted negatively by being surrounded by a housing estate. The rural setting and with it the associated wildlife should be protected by reinstating the green belt.