

10 July 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:	HR
First Name:	JAMES
Surname:	BRUCE
Date:	30/7/2020
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

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Please email or send the form to reach us by 17 July 2020 at the following address:

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Email: ldp@aberdeenshire.gov.uk

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YOUR DETAILS

Title:	Mr
First Name:	James
Surname:	Bruce
Date:	30/7/2020
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

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I object to the inclusion of sites OP1, OP2 and the amendment of the Green Belt boundary for the village of Potterton.

Inappropriate and unjustified use of Greenbelt

This is not an appropriate location for this scale of development, and I believe our 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.

The proposed sites do not meet the criteria for "Effective land" and it is constrained land, at a medium risk of flooding.

The previous Local Development Plan protected the Green Belt, the proposed LDP seeks to erode it.

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.

Please remove the ancient woodland as a provision for open space and remove it as enhancing diversity. It is not part of the OP1 and OP2 sites.

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

I appreciate that 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, despite residents asking Belhelvie Community Council for public consultation.

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. There is no date available for an expansion project.

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 just 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 can not claim there's no "*sense of place*" and "*lack of identity*" in our village, because it diminishes the experience of living here whilst equally appearing to market the Green Belt for development. Potterton has always been a community and the residents 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 13.3miles 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. Particularly, as OP1/OP2 borders ancient woodland and the habitats of many protected species.

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 and this should continue to be the case in all the planning documents.

“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

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 roads around Potterton are not suitable for additional traffic, as a result of development - construction traffic, cars or any additional volume of buses to route through the village or towards the AWPR. The roads including the various pinch points at Milton of Potterton are a

constraint which cannot be overcome to accommodate a bus and vehicle passing at the same time.

The creation of a rat run between Manse Road and the Den Road can not remove the roads constraint. The various pinch points on the Den Road and the road towards Milton of Potterton can not be widened as there are existing homes, such as my own, along these routes.

The Den road out to the AWPR is also not suitable for new bus routes or additional traffic, as it would have safety implications for the existing residents, and again, contains more narrow points, issues with visibility, and a hairpin bend at Milton of Potterton back towards the village. There is signage in place relating to oncoming traffic on the wrong side of the road.

Roads and Lack of Infrastructure

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.

Vision Statement

Please remove Potterton from the Strategic Growth Area in the Housing Allocations section of the Proposed LDP (Page 19, paragraph 5.14)

Please remove the Community Hall, the Business Units and the word "Contemporary" to describe the village. This has not been consulted on or engaged with. It passed through the Main Issues Report with no public scrutiny. There has been no public engagement with Potterton residents on wishes for any of these amenities.

Please reinstate the Green Belt classification on these sites, as this is an unjustified loss and inappropriate use of Green Belt.

Potterton is not shown on the Energetica corridor maps on their website as having any markers for allocation, such as housing. As such, this should be removed from This is justified because on the Energetica maps, Potterton and Belhelvie have no housing allocation markers to support the Energetica corridor. In fact, Potterton and Belhelvie have no markers at all. The Energetica corridor can not be used as a justification to allocate houses in the two settlements.

I wish to see a change to the wording of Potterton's Vision as I feel this is inaccurate and does not reflect the character of Potterton or the community's wishes. The wording should be changed to similar wording from the previous LDP as follows:

Potterton is a small village set in gently rolling farmland and located in the Aberdeen Housing Market and the Aberdeen Green Belt. Potterton is out with the Aberdeen to Peterhead Strategic Growth Area. The village is dominated by two large housing estates, 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 in 1 – 1 ½ story. The current settlement is surrounded by green belt, while a large protected area, including playing fields is located

within the settlement. The settlement has a limited number of services typical of a small community, including a local shop/post office, a community hall, a pub, a football pitch, tennis court and pavilion, play parks, a seasonal strawberry farm and business units located in the west of the settlement.

“The community have a desire for a new community hall in the settlement to supplement the Forsyth Hall’s Men Shed.” There is no Forsyth Hall’s Men Shed. As this is false information, this needs to be removed.

Belhelvie Community Council

I believe that Belhelvie Community Council have failed in their duties of keeping the residents of Potterton informed with regards to the Local Development Plan. Their criticism of Potterton residents is dismissive, as they claim concerns are solely based on, “Not in my back yard” however I feel that Belhelvie Community Council are not being representative of the community, with only one member of the Council as a Potterton resident.

During the Main Issues stage of the LDP, Chap made every effort to provide public consultation at Potterton with their public relations team, [REDACTED]. [REDACTED] are now providing public relations for Barratts for OP1 and OP2, but the residents have not been afforded that same level of public consultation prior to the Covid pandemic and prior to these bid sites reaching Stage 2 of the PLDP. Barratts North Scotland claim to have staged extensive talks with Belhelvie Community Council, in a Press and Journal article, dated 24th July 2020, however it would have been more appropriate to stage talks with the community rather than a housing developer.

Barratts have chosen to leave stacks of leaflets at the local shop and local pub, and only within ten days of the LDP consultation deadline (on 22nd and 23rd July 2020). However this does not constitute public consultation.

Minutes of the Community Council meetings do not reflect this statement of extensive talks, and if extensive talks have taken place then there should be public record of such and they should be noted in the minutes for the public to access.

“You have a duty to establish and reflect, through the Community Council, the views of the community as a whole, on any issue, irrespective of personal opinion. You should ensure that you are, within reason, accessible to your local community and local residents. Various mechanisms to allow the general community to express their views, i.e. suggestion boxes, community surveys, opinion polls should, where possible, be made available.”(Code of Conduct for Community Councillors, Scotgov)

<https://www.gov.scot/binaries/content/documents/govscot/publications/agreement/2009/03/community-councillors-code-of-conduct/documents/code-conduct-community-councillors-pdf/code-conduct-community-councillors-pdf/govscot%3Adocument/Code%2Bof%2Bconduct%2Bfor%2Bcommunity%2Bcouncillors.pdf>

The views of the community have not been heard, and this has been exacerbated by the pandemic, limiting access to public meetings. However, this has been ongoing far longer than the pandemic, and still Potterton residents have not been encouraged by Belhelvie Community Council to voice opinions on development here.

Please consider this a representation of my objections to the inclusion of sites at Potterton in the Proposed Local Development Plan 2021.