From:

**Sent:** 27 August 2020 16:01

To:

**Subject:** Fw: LDP - Formal objection. REF: LDP2021NN

From: Jenni Clarke

**Sent:** 30 July 2020 23:24

To: LDP < ldp@aberdeenshire.gov.uk>

Subject: LDP - Formal objection. REF: LDP2021NN

# To whom it may concern

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.

There are a number of reasons why I do not believe this development is in the best interests of the village of Potterton, and the wider community, which I will set out below. Please consider each paragraph below as an individual objection.

## **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. Greenbelt Land was established to maintain the landscape of the city and to stop urban sprawl, and yet the current plans backtrack on this and is entirely unnecessary. 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. With friends and family living in Potterton, I am a regular visitor to the village. We are so fortunate to have such an area to visit, which is especially relevant in the current climate. These areas have proved to be an invaluable resource allowing us to visit, socially distanced and outdoors, family and friends safely benefiting both our physical and mental health.

#### **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. As a teacher myself, I am massively concerned at the impact developments such as OP1 & OP2 will have on Balmedie Primary School. The school is already very well attended with 405 pupils, and the increase in

capacity equates to 140 children over capacity (5 to 7 extra classes) and 219 (7 to 11 extra classes) to up to more pupils than they currently serve.

#### **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)

### **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."

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.

#### **Strategic Growth Area**

Within Housing Land Allocation, it shows Potterton incorrectly allocated under the Strategic Growth Area. Potterton is in the Local Growth Area. It has been allocated in the Housing Land Allocation incorrectly and should be removed.

See page 5 - Housing Land Allocations

http://publications.aberdeenshire.gov.uk/dataset/f14a62da-30d1-488d-9338-7b09e82360cf/resource/e82ca8dd-76bf-48fa-89e7-311bb94bfaf5/download/appendix-6-housing-land-allocations.pdf

LDP - See page 90 "Potterton is out with the Aberdeen to Peterhead Strategic Growth Area"

http://publications.aberdeenshire.gov.uk/dataset/f14a62da-30d1-488d-9338-7b09e82360cf/resource/98efd358-d474-4846-b723-ed2ce176aed4/download/appendix-7c-settlement-statements---formartine.pdf

This was also previously discussed by the DPEA when reporting on the previous Local Development Plan. Potterton housing allocations have been put forward to promote the Energetica Corridor but Potterton is not tagged for houses as part of that corridor. This also needs amendment.

I would also like to highlight that the allocations at Potterton are not suitable, as shown by Aberdeenshire Council's previous LDP supporting document:

"If further allocations are appropriate in future, Potterton is not suitable for allocations as the settlement is currently constrained by a lack of educational, roads and water infrastructure." (Aberdeenshire Council's Local Development Plan, 2013, Formartine Settlement Appendix, Potterton pages 52-57

https://www.aberdeenshire.gov.uk/media/10940/formartineindexandsettlementstatementssmall.pdf

Potterton still has the same constraints relating to education, roads and water infrastructure. The construction of the AWPR was to improve connectivity as a transport corridor, not a development corridor. The AWPR is the only change to infrastructure here. The C1 class roads immediately surrounding the village and OP1/OP2 remain unchanged.

I have been unable to find a planning document to justify why OP1, OP2 and the removal of the Green Belt at Potterton has been considered to be "suitable" in the Proposed Local Development Plan.

The current vision for Potterton can be seen to show preference to large scale development, which is inappropriate in the settlement. I would like to see the Vision for Potterton amended to reflect previous development plans, in order to protect the character of the settlement. The reference to "contemporary" should be removed as Potterton is a rural settlement comprised of 1-1 1/2 story homes.

### 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. As a resident of Aberdeen City, I can already see the impact on the housing market the downturn in the oil industry has had, and I believe any additional developments to the extensive size of OP1 & OP2 at Potterton (and eventual 3000 homes in Fortmartine) is not only unneeded but will be detrimental.

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.

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.

As I have previously stated and for the reasons above, I object to the OP1 & OP2 developments around Potterton as detailed in the Local Development Plan (LDP2021NN) and would ask for confirmation of you receiving this representation.

Many Thanks

Jenni Clarke

