

## Katherine Regulski

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**From:** Sylvia Coutts on behalf of Garioch Planning Apps  
**Sent:** 23 June 2015 14:04  
**To:** Planning Online  
**Subject:** FW: APP/2015/1107 - Proposed Residential Development (Erection of 66 Dwelling houses) - Land East Of Greystone Road Kemnay  
**Attachments:** APP-2015-1107-signed.pdf

For your attention

Aberdeenshire Planning Applications (Garioch) Email Enquiries  
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**From:** GILLIAN WEST [REDACTED]  
**Sent:** 23 June 2015 13:30  
**To:** Garioch Planning Apps  
**Cc:** Bruce Strachan  
**Subject:** APP/2015/1107 - Proposed Residential Development (Erection of 66 Dwelling houses) - Land East Of Greystone Road Kemnay

I refer to the above planning application and should be grateful if you would include the attached representation as an Objection from a member of the public.

Best regards,

Gillian West

23 June 2015

Attn. Mr Bruce Strachan  
Senior Planning Officer  
Garioch Area Office  
Aberdeenshire Council  
Gordon House  
Blackhall Road  
Inverurie  
ABERDEENSHIRE AB51 3WB

Dear Mr Strachan,

**APP/2015/1107 : Proposed Residential Development (Erection of 66 Dwelling houses) -  
Land East Of Greystone Road Kemnay**

As a resident of Kemnay for over 14 years, I have observed at first hand the relentless residential development which has taken place in Aberdeenshire in general and Kemnay in particular during that time.

Despite the existence of clearly documented and well thought-out planning policies and planning advice notes, it is apparent that many developers, in their drive to maximise profits and throw up yet another cookie-cutter development, merely play lip-service to the design principles contained in the legislation, make promises to deliver affordable homes which they ultimately wriggle out of and pledge contributions towards 'community facilities' which never materialise. The result is that rural villages like Kemnay and many others expand beyond the capacity of their schools, health and social services, face increased demands on existing leisure and civic amenities which cannot cope or, in many cases, where said facilities do not even exist in the first place. The upshot is, many people who move to a village seeking a safe and open place to raise their families and where they hoped to be able to walk to schools, parks and shops, spend their lives commuting by car to avail themselves of the essentials in life, whilst cluttering up narrow village streets and country roads with large vehicles they were never designed to cope with. In short, we are progressively and relentlessly allowing rural Scotland to be suburbanised but the infrastructure to support and sustain these newly enlarged and expanded communities is rarely, if ever, forthcoming.

Continually the "economic and social benefits" of new developments are extolled by developers when trying to win public or Planning Department support, yet the economic benefits accrue exclusively to the proposers of these developments and the social benefits are at best tenuous and generally unquantifiable or boil down to ownership of an over-priced 'doll's house'. In this context, I fear that approval of the subject application would only exacerbate this situation and wish to object to it on the material grounds outlined below.

**1. Masterplan**

It is a requirement that major developments of >50 houses produce a masterplan and hold full public consultation sessions. The existence of the aforesaid masterplan for the development at Bogbeth Road, although seemingly uploaded to the Aberdeenshire Council Planning website some time in 2014, was never made public knowledge hence "the public" were neither aware of its existence nor where to access it. Furthermore, the public meeting to discuss the development was not adequately advertised, neither from the perspective of sufficient advanced warning nor by use of the widest possible media coverage, hence turnout was extremely low. Most damning of all, it would appear that the developer, Halliday Fraser Munro for Barratt North East Scotland, did not even involve Kemnay Community Council. This is the antithesis of public engagement and the developers have clearly failed in their duty to engage with the public.



## 2. Prematurity

The subject site was identified in the current LDP as a bid site for draw-down in the second phase of the LDP plan period, i.e. from 2017 to 2023. As we are told in the draft LDP, which is currently out for review, that there is a sufficient supply of development land for the next 5-7 years, there are no grounds for the early draw-down of LDP bid sites, thus the presentation of this application is premature and should be rejected as such by Aberdeenshire Council. Furthermore, local schools are currently at capacity so the approval of a development of 66 houses, which could potentially add 100+ children to the school roll at primary and secondary level is unacceptable before educational capacity and accommodation issues have been adequately addressed and resolved.

## 3. Density and Scale

The proposal is for 66 houses on a 3.02ha site, of which only 60% can be built on as a result of a 40% Open Space requirement. **SG Housing 1: Housing Land Allocations 2007-2016** states:

*“While the density of any individual development will be a concern of marketing, site and design needs, we expect the overall density of residential development to be provided at approximately 30 houses to the hectare.”*

**On the basis of the above,  $3.02\text{ha} \times 0.6 \times 30 = 54$  houses, NOT 66.**

Not only is the applicant overdeveloping the site, the 2-storey design houses are inappropriate for the rural context, do not reflect the vernacular 1.5 storey house type in the village and, most importantly, are not appropriate for a sloping site as they will be too dominant. It should also be noted that, despite the 40% Open Space requirement for developments of >50 houses, **the developer has in fact only allowed 37%**. The shoe-horning of 66 houses onto the remaining 1.9 hectares of land means that the actual density at the site is around 35 houses/hectare.

It should also be borne in mind that, although Kemnay falls within the Aberdeenshire Housing Market Area (AHMA), it is, nonetheless, a rural village and as such, the density and layout of any development should reflect its rural context. The site in question is a sloping agricultural field on a narrow rural farm access road which culminates in a dead end. It is not an inner city, brownfield re-development site which has to maximise a tight footprint by providing high volume per hectare development. Even a cursory glance at **Pan 67, Layout, Siting and Design** and the best practise example elaborated in this document, it can be seen that the scale, density, house design and access for this site leave much to be desired and are not appropriate for the site or setting. Whilst 30 houses/hectare might be an average indicator, clearly in a rural it should be considerably below this to ensure adequate amenity and space for homes to adapt in future. Given the largest of the homes planned for this site is around 1500 sq ft, with only one storage cupboard per home and that **only 22 out of 66 houses will have a garage**, it is difficult to see how these homes could be adaptable in future or how it is even acceptable, given the local climate and modern life styles, for the developer to be allowed to get away with such paltry provision.

The site location is of particular concern as, seeking to cram 66, mostly family houses, which will undoubtedly have 2 vehicles per household, onto a site which lies beyond the current village boundary, on a narrow rural access road which is in fact a dead end, is wholly unacceptable and unsuitable in such a location.

## 4. Roads & Access

As mentioned above, perusal of an Ordnance Survey map shows that Bogbeth Road is a narrow, unclassified country lane which terminates at a farm. It is not an arterial access route, it is not a through road which links up to larger roads such that it demonstrates connectivity or an ability to improve or ease traffic flow around the village. Furthermore, on the development side of this road, there is a deep ditch with a small stream running through it which makes widening a difficult



operation, whilst on the opposite side of the road lies the woods of Kemnay House Estate which are private grounds and cannot be used for road-widening purposes. Add to this mix the fact that, Bogbeth Road joins the B993 at a T-junction, on a bend of the road with poor visibility for vehicles coming from the direction of Kintore, then adding a further 66 houses, which will undoubtedly bring with them 100-120 extra cars, is a recipe for chaos. Our main concerns with the developers access proposals are:

- Access to the development is planned via Barratt's Phase 1 Development at Bogbeth Rise. As this will add extra traffic to an already busy and narrow urban access road, cause an existing cul-de-sac to become a through-road and mean the development will become a log-jam of cars, we consider this proposal to be ill-thought out and unacceptable to both existing and future residents.
- Access via Bogbeth Rise will make this more dangerous for children and pedestrians and turn this into a 'rat-run' at rush hour.
- The narrowness of Bogbeth Road and the roads within the existing and proposed developments plus their winding nature will make it difficult for large vehicles such as utilities, refuse collection, deliveries and removals vehicles to go about their business without completely blocking the site.
- Where and how will large vehicles be able to turn in/out of the development in the absence of a separate, wide entrance splay? This could force large vehicles further along the road to Laschangie in search of a suitable turning point.
- The access option via Bogbeth Rise and layout of the roads will make access by emergency vehicles extremely difficult and it would be unacceptable if lives were put in danger through a developer trying to maximise the profit from the site at the expense of safety and ease of vehicular movement.
- No road widening, passing places or footpaths on the development side of the road have been planned which we consider to be unacceptable, especially when the developer is denying 44 out of 66 households the right to a garage to "encourage non-vehicular forms of commuting"!
- The lack of footpaths will make it difficult for parents with prams/pushchairs and disabled people to reach the village safely this should be urgently revisited by the developer. The loss of 4-5 houses on their plot is nothing in comparison to the loss of life or limb resulting from a lack of safe pedestrian routes. To suggest that people will wend their way through Bogbeth Rise when the shortest distance between two points is a straight line, is a nonsense and will not happen in reality.
- The developer attempts to justify the lack of garage and parking provision on the basis that it will 'encourage walking and the use of public transport'. Publishing the numbers of the bus routes serving Kemnay is facile when a glance at a bus timetable shows that only 3 services per day are capable of getting commuters to Aberdeen before 09:00hrs, yet many offices and business actually start work earlier than this. Buses to Inverurie are even less frequent so the majority of Kemnay residents commute to work by private car, generally to Aberdeen, as a result of infrequent transport provision AND because there are no large employers in the local area. This development will add to the commuter numbers on the road yet the developer doesn't have the decency to afford prospective residents adequate space to park off-road, allowing paths to remain free for pedestrians and children.
- Bogbeth Park is a well-used local amenity enjoyed by families, which hosts football matches and tournaments as well as cricket, there are tennis courts, a bowling club and a nursery group run from the pavilion, all of which generate traffic over and above that of the residents, thus parking pressure will become unbearable with the addition a further 66 homes.

Given the foregoing, we feel that the developer should be **refused** permission to progress with the proposed development in its current form on the grounds of prematurity, road safety and over-development of the site and trust that the Planning Department will put the concerns of the community ahead of the pecuniary interest of the developer.

Yours sincerely,



Gillian West