

Kemnay Community Council

Chair: Hazel Smith

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Cc: Ctrs. S Lonchay, A Grant and P Oddie

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Mr Matthew Watt
Planning Officer
Aberdeenshire Council
Gordon House
Blackhall Road
INVERURIE, AB51 3WA

Dear Mr Watt

APP/2016/3387 Erect 2 Holiday Lodges Adjacent To Fairview, Blairdaff, Kemnay

The above planning application has been considered by Kemnay Community Council and it has been agreed to object to the proposals for the following reasons:

1. The proposals are contrary to SG RD1: Housing and business development in the countryside

- a) it is not for a development that would be permissible under the greenbelt Supplementary Guidance,
- b) it is not for the refurbishment or replacement of an existing or disused building,
- c) it is not on a site which has previously been developed and is now redundant,
- d) it is not an employment proposal; OR an appropriate addition, in scale and character, to an existing cohesive group of at least five houses.

Reasoned Justification

The site is in Aberdeenshire countryside and consists of scrub woodland with some mature trees; there are no disused or redundant buildings or hard-standings. It is not an employment proposal other than the initial construction of the lodges. Development of this site could pose a risk of sporadic and intrusive similar developments to the detriment of the character of the landscape.

2. The proposals are contrary to SG BUS4 Tourist Facilities

The proposed Lodges are not well related to existing settlements and the applicant has not demonstrated a locational requirement based on the need to be near to the specific tourist attractions being exploited and that the facility has the potential to damage tourism in the area.

Reasoned Justification

The proposed site is considerably remote from the nearest village communities of Monymusk and Kemnay. The Supporting Planning Design Statement does not identify a need for holiday lodges in this specific area; it merely lists a number of mainly unidentified tourist attractions throughout Aberdeenshire. On this basis any site could be chosen for such development, which may lead to a sporadic and dispersed pattern of similar developments throughout the area, detrimental to the countryside, landscape character and tourism. The area has sufficient provision of holiday lodges, planning consent has recently been granted for 18 Holiday Lodges at Benview Caravan Park, Kemnay. No documentary evidence has been submitted to indicate that the proposal would have the support of Visit Scotland.

3. The proposals are contrary to SG LSD2: Layout, siting and design of new development

- a) the setting does not respect its relationship to the existing landscape
- b) the site has poor if not hazardous connectivity in that there are inadequate access sight lines.

Reasoned Justification

The proposals are out of character with the surrounding area and the access to the site is poor if not dangerous. The site is well below the level of the adjacent road and when egressing the site we would estimate only approximately 80 mtrs. visibility to a blind bend to the north and a similar distance again to a blind summit to the south. Based on Aberdeenshire Council's current standards, we do not think the proposed access is capable of complying with minimum visibility requirements of 2.4 mtrs. x 90 mtrs.

4. The proposals are contrary to SG Safeguarding3 Protection and conservation of trees & woodland

The proposals may be detrimental to the biodiversity and amenity value of the woodland and habitat, including current and future benefits of the existing woodland.

Reasoned Justification

The Environmental Walkover Survey is not in accord with numerous comments made by people who live in the vicinity and therefore requires further investigation. It is of concern that as many as 28 of the 80 trees on the site will have to be felled in order to develop this site and we consider that such environmental destruction cannot be justified for the development of two holiday lodges. There is certainly an abundance of additional mature woodland in the vicinity but this is always vulnerable to harvesting and clear felling so the retention of small pockets of scrub coppice style woodland is essential for supporting wildlife habitat.

5. General Comment

a) The Supporting Planning Design Statement (SPDS), makes a very poor and inadequate case for the proposed development. Apart from lack of evidence to support a need for development in this specific location, the bulk of the SPDS content consists of Scottish Government Guidance, PAN's, Structure Plan, Local Development Plan, Supplementary Guidance and other documentation all of which is just listed verbatim with no cross reference as to how any of the policies and guidance may support the development proposals. Overall, it implies an underlying lack of conviction for the proposals, which is somewhat confirmed in final part of the SPDS subtitled "Discussion and Conclusions", where it is quite evident that the case is so tenuous that the penultimate paragraph is identical to the first paragraph.

b) We note that many of the letters of objection make reference to the current planning application APP/2016/1061 for Part Retrospective Formation of 7 Pitch Caravan Park for Gypsies/Travellers at Quarry Wood, Kemnay. Although it is not strictly material to this present application, it is nevertheless a fact that APP/2016/1061 is a site with an existing consent for 3 holiday lodges and Planning Service are supporting change of use to accommodate 7 mobile homes and 14 to 21 additional caravan pitches. Given that this site is a similar size to Quarry Wood, it is an inevitable and understandable cause for concern that this present application for 2 holiday lodges could potentially evolve into another caravan site.

c) For clarification, the applicant does not live adjacent to the site at Fairview, which may be confusingly inferred by way of the application description.

Yours sincerely

David Evans
pp Kemnay Community Council