

<b>PLA/22/045. Aberdeen Planning Guidance: Draft Prime Four Business Park Development Framework</b>		
<b>Summary of responses and issues arising from public consultation held from 17 December 2021 until 31 January 2022</b>		
<i>Key issue</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
<b>1. William Thomson</b>		
1.1 The plans set out regarding the further development of the Prime Four development as a positive sign of growth and would bring welcomed change to the area of Kingswells.	Comment noted	No action required
<b>2. Historic Environment Scotland</b>		
2.1 Welcome dedicated section within the document to the Historic Environment.	Comment noted	No action required
2.2 Given the majority of the unbuilt site is in OP29 and the west of OP63 it is understandable that the document focusses on the Category C listed Friends Burial Ground. Welcome the consideration given to this site and its setting.	Comment noted	No action required
2.3 note that the detail on the consumption dyke is not carried forward into this document. It is essential that the document continues to safeguard the site and setting of the scheduled monument.  Welcome the acknowledgement of the role played by the consumption dyke in understanding the landscape and historic context of the site as relayed in Section 6: Landscape Framework.	Within the key principles the document still acknowledges the importance of the consumption dyke and states “the existing field setting of the Consumption Dyke will be retained, protected and enhanced by the development of the Northern Park.”	No action required
<b>3. Transport Scotland</b>		
3.1 Have no particular issues with the draft report.	Comments noted.	No action required.

<b>4. SDPA</b>		
SDPA no longer statutory body and no longer permanent staff. Nevertheless on the basis that “The general principles, aspirations and design quality across the site will remain the same and are a key part of this development.” They have no comments or observations to make.	Comments noted.	No action required.
<b>5. Scottish Water</b>		
5.1 There is reference to ‘Sewers for Scotland’ 2 <sup>nd</sup> edition. The this should be the 4 <sup>th</sup> edition.	Comments noted.	Amend Draft Prime Four Business Park Development Framework to refer to the 4 <sup>th</sup> edition of this guidance.
5.2 Recommend that ACC or developers contact Scottish Water at their earliest convenience for any specific enquiries.	Comments noted.	Advise agents of comment.
<b>6. Cults, Bieldside and Milltimber Community Council (adjoining community council)</b>		
<p>6.1 Section 4.3 mentions the possibility of refuelling and recharging facilities onsite.</p> <p>The A90 including the AWPR currently has no easily accessible fuel stop between Ellon to the north and Stracathro/ Bridge of Fiddes to the south.</p> <p>The south/ west corner of OP63 would make an attractive location for either a new build refuelling stop or the redevelopment of the existing Five Mile Garage. From this roundabout it could serve A944 and A90.</p> <p>Any new development should provide refuelling, Electric vehicle recharging and preferable hydrogen fuel facilities.</p>	<p>It is not appropriate for a Development Framework to go into such detail in relation to specific uses. It mentions a number of possibilities which will be considered in line with policy at the time of any application.</p> <p>There will be a requirement for EV charging points as part of the Prime Four Business Park development.</p>	<p>Add a note that EV points will be required throughout the site as part of the development.</p>
6.2 Any new development should not preclude and ideally should enhance any proposals for mixed- use walking and cycling path	Comment accepted.	On page 22, Figure 14 – add in an extra “proposed cycle network” dashed line

brought forward from the A944 Corridor Study.		alongside the “proposed footpath network” dashed line between the A944 frontage and the western hub in order to allow this link between these areas to be both pedestrian and bike.
<b>7. NatureScot</b>		
We support the preparation of this Development Framework which builds on the previous Framework and the continued aspiration to produce a design-led framework for ongoing and future phases at Prime Four. Detailed comments provided in Annex.	Comment noted	No action required.
<p>7.1 <b>Woodland</b> - Figure 2 of the previous framework extracts on page 7 that compare the two documents shows a notable loss in the number and extent of proposed woodland belts.</p> <p>The largely wooded character of the existing phase appears to peter out while the notional buildings stay the same size. It does not reflect the character (thickness and extent) of the existing woodland in the extended network of the adopted framework.</p> <p>Section 3.1 states “Retaining and enhancing existing features will continue to be prioritised as the development continues westwards into future development phases” therefore keen to see an increase and strengthening of the proposed wooded character belts(linear extent and thickness) per the original framework. This would fulfil the key design principles of the framework.</p>	<p>The building footprints as built were larger than those shown in the proposed site layout.</p> <p>In terms of site OP68 the proposed tree areas are actually more meaningful and substantial than those shown in the adopted document and in particular to the north, north east and south of the ancient woodland. This said the area around the Friends Burial Ground has less planting that previously proposed and agree that further consideration should be given to extending a tree belt around this area per previous Framework .</p> <p>There may also be scope to provide more tree cover to the western boundary. This said the Development Framework does acknowledge the importance of AWPR corridor visually</p>	<p>Give further consideration to the potential of tree belts around the Friends Burial Ground and the western boundary per the previous Framework and update fig 24 accordingly.</p>

	and states on page 23 where it discussed that there will be areas of interest or elevational treatments to the AWPR.	
7.2 <b>Key principles(p11)</b> – support the key principles and in particular in relation to the Green Space Networks and using footpath and cycle connections to encourage sustainable travel to and around the site. Framework presents an opportunity to integrate green and path networks.	Comments noted.	No action required.
7.3 Would be beneficial to carry out an assessment on the impact and success of the principles of the previous frameworks and the earlier phases of development. Not clear from the aerial photos of the site whether “recognition and enhancement of existing landscape features and planting” has been achieved.	Comments noted. This would not be something that would be stipulated in the Development Framework but would be an interesting project for ACC planning to carry out in conjunction with the developer/ agent.	No change proposed to the document but ACC planning to engage with the agent to consider a peer review of previous framework onsite for lessons learnt.
7.4 Principles which seek to recognise and enhance the existing landscape features and use the traditional field patterns and woodlands as design inspiration are also welcomed.	Comments noted.	No action required.
7.5 <b>Vision (p12)</b> – Generally support vision and pleased it seeks to provide “sustainable , well integrated extension to Kingswells” however given the urgency of the climate change and biodiversity loss crises the framework should be more ambitious in creating nature-rich development. Therefore recommend rewording the vision to <i>“To provide Aberdeen City with an innovative, desirable, high quality development <b>on a nature-rich site that is access by active and sustainable transport links. The site supports inward investment in one of the City’s most recognised and successful business locations...</b></i>	The proposed changes to the draft covered elsewhere in this table include increase in blue- green infrastructure and the potential of habitat creation around the SUDs and the woodland buffers areas.  The vision does not require a change.	No action required.
7.6 <b>Potential uses (p17)</b> – Developing the new western hub as a flexible mixed use site will help to create a vibrant space which is adaptable to the future. In order to fully deliver this need to incorporate multifunctional blue- green infrastructure which will help to tackle the climate change and biodiversity emergencies as	Note that this site would be ideal for incorporating blue- green infrastructure into it.  Also not the importance of high quality	Page 17, at the end of ‘New Western Hub’ paragraph add “ The masterplan would consider green and blue infrastructure to support the proposed development.”

<p>well as provide valuable green space.</p> <p>The Covid 19 pandemic has highlighted the importance of high quality green space. Recommend this is also included on the list.</p>	<p>green space.</p> <p>Other comments have raised this and suggest how it can be incorporated into the development.</p>	<p>Page 24, figure 16. In the key, after 'hub circulation zone' add "with opportunities for green and blue infrastructure"</p> <p>Page 33, figure 24. In the key after 'Extended landscape network' add "with opportunities for green and blue infrastructure"</p> <p>Page 35, 5th bullet, re-word to "enhancing landscape features and planting using existing landscape features as the design context with opportunities for green and blue infrastructure".</p>
<p><b>7.7 Key design principles (P18)</b> Strongly support identification of design principles, particularly in relation to the active travel path network, active frontages, public spaces, the integration of existing natural features and opportunities to incorporate enhancements to biodiversity into the design. This said the document should reflect on previous development and identify how it could be improved.</p> <p>Ped and cycle links should be prioritised over vehicles, particularly between office buildings, shops etc. This document puts emphases on safe routes within the site and vehicular access rather than the emphasis of the previous framework which had a stronger focus on active travel and this should be carried through to this document.</p>	<p>Comment noted and accepted.</p> <p>Greater emphasis should be placed on the strong focus of active travel to and within the site.</p>	<p>Stronger emphasis needs to be made within the document of the priority of pedestrians then cyclist over vehicles.</p> <p>On page 22, Figure 14 – add in an extra "proposed cycle network" dashed line alongside the "proposed footpath network" dashed line between the A944 frontage and the western hub in order to allow this link between these areas to be both pedestrian and bike.</p>
<p>Consider the principles protecting natural features and biodiversity and improve wildlife should be strengthened. This is particularly important given the twin climate change and biodiversity loss crisis. Suggest text amended as follows :"</p> <p><i>"All opportunities to maximise the biodiversity value of the site should be taken from the outset of the design process".</i></p>	<p>Comments noted and accepted</p>	<p>Add a key design principles on page 18 to state "All opportunities to maximise the biodiversity value of the site should be taken from the outset of the design process".</p>

<p><b>7.8 Access Strategy(p20)-</b> To truly create a multifunctional spaces around the Fourcourt recommend the inclusion of multifunctional blue-green infrastructure, integrated with the network of paths.</p>	<p>Comments noted and accepted</p>	<p>Amend per 7.6 above</p>
<p><b>7.9 Connectivity and circulation(p21)</b> - the Framework states that “For the south west section of the site a new vehicular access to/from the A944 may be possible”. Give that there is a cycle path along the A944, we think it is important to provide access for pedestrians and cyclists. The connection seems to be apparent in some figures but is less clear on others.</p>	<p>Comments noted and accepted</p>	<p>On page 22, Figure 14 – add in an extra “proposed cycle network” dashed line alongside the “proposed footpath network” dashed line between the A944 frontage and the western hub in order to allow this link between these areas to be both pedestrian and bike.</p>
<p>Blue -green network within the path network should be clearly shown in figure 13 to ensure developers are clear to what is expected.</p>	<p>Comments noted and accepted</p>	<p>Amend per 7.6 above</p>
<p><b>7.10 Building form and parking(p24)</b> – welcome creation of building clusters to create vibrancy, interaction and activity at street level.</p>	<p>Comments noted.</p>	<p>No action required.</p>
<p><b>7.11 Building heights-</b> the intention to develop a building of height ie no greater than 5 storeys” requires further surveys and direction to ensure that there are no landscape or visual impacts. This is not a city centre location and, as such, lower heights of buildings are preferable to respond to the surrounding more rural/peripheral context. If the landscape framework is to accommodate the development and provide setting, the scale of the buildings needs to consider the likely mature heights of any proposed woodland planting. Greater elevation means there is less opportunity or buildings to be above a certain height without introducing significant landscape and visual effects.</p> <p>Ideally the heights of the existing buildings in Prime Four should be used as a guide for any new development.</p> <p>We recommend that the Framework clearly sets this out and stipulates the appropriate number of storeys for the development rather than</p>	<p>Having looked at the previous DFs again if would appear that the area to the southwest was originally in the DF as 3 storeys up to 16 metres. This should be carried forward to the new DF particularly given no detailed masterplan has been provided for this area.</p> <p>Agreed that there are a number of factors that can determine the height from scale, massing and siting with the plot. As such text should be added to state that the heights are indicative and further detailed assessments including Visual Impact Assessments (considering a number of vantage points will be</p>	<p>Change fig 17 so show the southern zone adjacent to the A944 to be up to 3 storeys unless a further justification is submitted at the time of an application.</p> <p>Add additional text to page 25 stating that all heights are indicative and will be fully considered and assessed as part of any planning application. State that any proposal will include and be informed and shaped by (but not exclusive to) Landscape Visual Impact Assessments, 3D visuals, boundary treatment assessments and sections through the site.</p>

leaving this to be considered at <b>“the time of the proposal”</b> .	required at the time of any application.	
7.12 <b>Historic Environment(p29)</b> : Woodland Exclusion Zone – Strongly support the inclusion of the buffer and localised areas of open space in relation to the ancient woodland.	Comments noted.	No action required.
7.13 <b>Landscape principles(p31)</b> – welcome the objective to incorporate the development into the landscape and presents the opportunity to reinforce the landscape character across the site.  Welcome acknowledgement of existing features like dykes, ancient woodland etc.  Pleased to note a detailed tree survey will be carried out to inform tree retention.	Comments noted.	No action required.
7.14 The Framework states that “Development proposals should consider opportunities to enhance connectivity between open spaces and key green and blue infrastructure in line with emerging policy”. However, we think that the Development Framework itself should identify where opportunities for this exist and provide direction.  It would be useful to include a diagram setting out blue-green infrastructure assets and identify opportunities. This could be in conjunction with the active travel network.	Comment accepted.	Amend per 7.6 above.
7.15 Welcome recognition of amenity opportunity presented by the SUDS basin in the northern zone and consider this could be integrated into the site design as a multifunctional feature which is attractive and accessible. Ensuring that opportunities are taken to maximise the biodiversity value of the site.	Comments noted and accepted.	Add a sentence at the end of page 31 identifying the potential for the SUDs basin to contribute to and maximise its biodiversity potential.
7.16 <b>Landscape Framework(p33)</b> - The protection and integration of key landscape features, such as the ancient woodland to create, a sense of place is supported. We also welcome tree and shrub planning using appropriate native species to enhance the biodiversity value of the site. This aligns with the outcomes of the emerging NPF4 which seeks to secure positive	Comments noted.	No action required.

effects for biodiversity.		
7.18 <b>Key Principles (p35)</b> – welcome the principles but need to include that multifunctional blue – green infrastructure including green space should be a key principle.	Comment accepted.	Amend per 7.6 above.
7.19 <b>Infrastructure (p39)</b> It would be useful to have a section here on blue-green infrastructure identifying the existing assets and opportunities as well as information on incorporating it into the design. This would align with the emerging NPF4.	Comment accepted.	Amend per 7.6 above
<b>8. SEPA</b>		
8.1 reviewed the attached <b>Prime Four Business Park Development Framework 2021</b> and had no site-specific comments in relation to SEPA's interests.	Comments noted.	No action required.