

### **1. William Thomson - Resident**

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.

### **2. Andrew Stevenson - Historic Environment Scotland**

We understand that this Development Framework is intended to consolidate and refresh a number of existing pieces of Supplementary Guidance from the Aberdeen Local Development Plan covering the Prime Four Business Park at Kingswells.

We welcome that the Development Framework has a section dedicated to the consideration of the historic environment in bringing forward the development sites. Given that the majority of the unbuilt section of the Prime Four Business Park lies in the Aberdeen Local Development Plan allocation of OP29 and the western extent of OP63 this section is understandably focused on the Category C listed Friends Burial Ground (LB15680) and we welcome the consideration given to the site and setting of this historic environment asset.

We also note that the historic environment section does not bring forward previous information relating to the scheduled monument Kingswells, Consumption Dyke (SM108) which is an important feature of the area and bounds the northern edge of the site. It will be important that the framework continues to ensure the continued safeguarding of the site and setting of the consumption dyke. We therefore welcome the acknowledgment 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.

### **3. Denise Angus - Transport Scotland**

Thank you for the opportunity to review the Draft Prime Four Business Park Development Framework 2021. Following our review I can advise that Transport Scotland Development Management Team have no particular issues with the draft report.

### **4. Sheena Lamont – Former SDPA**

Dear Laura

It is an assumption made by me that the reason for you contacting me regarding the changes to the Prime Four Business Park Development Framework is because I previously worked for the Aberdeen City and Shire SDPA. The SDPA is no longer a statutory body and as such no longer has permanent staff. I appreciate that I was probably the last person on the its books.

It might be worthwhile amending your consultation lists to reflect this changed situation.

Nevertheless, thank you for the opportunity to make comments on the updated the Prime Four Business Park Development Framework. You have advised that “The general principles, aspirations and design quality across the site will remain the same and are a key part of this development.”

On this basis I can advise that I have no comments or observations to make on the updated Development Framework.

Should you wish to receive local policy comment from Aberdeenshire Council, I suggest you contact Local Development Plan officers at Aberdeenshire Council.

Once again thank you for the opportunity to make comments.

Regards

Sheena Lamont

#### **5. Scottish Water – David Carmichael**

Laura,

I refer to your email dated 06 January 2022 regarding Prime Four Business Park Development Framework 2021 Consultation.

Scottish Water would like to thank you for the opportunity to provide feedback and would make the following comments shown below:

In section 7 Development Framework, subsection 7.2 Drainage, there is reference to ‘Sewers for Scotland 3<sup>rd</sup> Edition’, please note that the publication has been superseded by ‘**Sewers for Scotland 4<sup>th</sup> Edition**’. it is recommended that Aberdeen City Council or Developers contact Scottish Water at their earliest convenience for any specific enquiries regarding the development.

I trust that the above information is acceptable in line with your request for feedback. Should you require further clarification, please do not hesitate to contact me.

Kind Regards

David Carmichael

#### **6. Cults, Bielside and Milltimber Community Council – Colin Morsley Planning Liaison Officer**

Dear Laura

**Prime Four Business Park Development Framework 2021 Consultation**

Thank you for the opportunity to comment on this consultation. The Prime Four site lies just outside the Northern boundary of our Community Council area. There are only a few local residences in our area immediately South of the A944 which might have their amenity affected and we trust that they will be aware of the proposed new framework. We only have two comments.

1. The framework document mentions briefly at section 4.3 the possibility of providing refuelling and recharging facilities on the site. The A90 including the AWPR currently has no easily accessed fuel stop between Ellon in the North and Stracathro/Bridge of Fiddes to the South of Aberdeen. We suggest that the South West corner of the OP63 site with direct access from the A90/A944 roundabout might offer an attractive location for either a new build refuelling stop or a redevelopment of the existing Five Mile Garage. Access from the roundabout would serve both A90 and A944 traffic. We are aware of other early-stage proposals for fuel stops along the AWPR which should also receive consideration. Any new development should provide refuelling, electric vehicle rapid recharging and preferably hydrogen fuel facilities.
2. Any new development should not preclude and ideally should embrace any proposals for a mixed-use walking and cycling path brought forward from the recent A944 Corridor Study.

Yours sincerely

Colin Morsley

**7. NatureScot- Katie Bain**

Dear Laura,

**PRIME FOUR BUSINESS PARK – REVISED FRAMEWORK – NOVEMBER 2021 – ABERDEEN CITY COUNCIL**

Thank you for consulting us on the above Framework which we received on 16 December 2021. We have reviewed it in line with our remit and have provided some comments below. Our detailed comments can be found in Annex attached to this letter.

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. We particularly welcome the use of design principles and a landscape framework which present an opportunity to incorporate blue-green infrastructure and placemaking elements into the design of the site from the outset.

Whilst there is some consideration of open space we think that, given the climate change and biodiversity crises, the Framework could go further in creating high-quality, biodiversity-rich green spaces across the site. From the figures provided of the earlier phases the open space does not appear to be particularly biodiverse and so we recommend considering how this can be improved upon and delivered by this Framework.

The emphasis on active travel networks within the site is an important aspect of the Framework and we welcome this. However, we think it will be important to assess the success of the previous phases in delivering this and identify any improvements that could be made. We note that the previous Framework considered active travel access to the site but this Framework appears to focus more on the internal path network. There are also opportunities to incorporate multifunctional blue-green infrastructure with the path network. By linking this in with existing assets such as ancient woodland, this would create an interwoven blue-green network across the site providing recreational opportunities and well as enhancing habitat networks and creating a sense of place.

We hope you find our comments useful but if you have any questions, please do not hesitate to get in touch with myself at or on

Yours sincerely,

Katie Bain

Table of comments continued next page.

**Annex – Detailed Comments Section NatureScot Comment**

**/ Page**

Woodland

In Figure 2: Previous Framework Extracts (p. 7), which compares the original and updated Frameworks, there is a notable loss in the number and extent of proposed woodland belts for example at The Hub and within the network of green space north of Kingswell House. The largely wooded character of the existing phase appears to peter out and whilst the notational buildings remain of the same scale, the proposed wooded framework has reduced. This fragmentation of proposed woodland is reflected in Figure 3 (p. 8) which shows smaller thinner fingers of woodland within the framework. Section 3.1. (p. 11) states that “*Retaining and enhancing existing features will continue to be prioritised as the development continues westwards into future development phases.*” We are therefore keen to see an increase and strengthening of the proposed wooded character belts (linear extent and thickness) both in the overall framework (Northern zones and western zones – Section 6.2) and for 063 Framework as per the original Development Framework and to maintain the vision of a quality award winning setting. We consider that this in turn would better fulfil the Key Design Principles (Framework Section 4.4), in particular:

- Of enhancing the sense of identity
- Of creating a distinctive place, maintaining the distinctive field pattern and character of the existing landscape (where thicker tree belts and copses form part of)
- Supporting green networks in and around the proposed development area and provisions made to connect these to the site and wider area
- Opportunities to improve habitats and support wildlife, and biodiversity should be considered in detailed design (stemming from a strong framework)

As currently presented the proposed woodland framework does not, we consider, reflect the character (thickness and extent) of the existing woodland in the Extended Landscape Network (Section 6.3 page 33).

3.1 Key Principles (p. 11)

We support the key principles identified, particularly in relation to the Green Space Networks and using footpath and cycle networks to encourage sustainable travel to and around the site. The Framework presents an opportunity to integrate the green network and path network to lock in multiple benefits for the site.

However, we think it would be beneficial to carry out an assessment on the impact and success of the principles of the previous frameworks on the earlier phases of development. For example, “*Recognition and enhancement of existing*

*landscape features and planting*". From the aerial photographs of the site, it isn't clear whether this has been achieved on-site. Similarly in relation to footpath and cycle networks.

The 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.

### 3.2 Vision (p. 12)

Generally, we support the Vision and are pleased that it seeks to provide a *"sustainable, well-integrated extension to Kingswells"*, however, given the urgency of the climate change and biodiversity loss crises we think the Framework should be more ambitious in creating a nature-rich development. Therefore we recommend amending the Vision to *"To provide Aberdeen City with an innovative, desirable, high quality development **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...**"*

### 4.3 Potential Uses (p. 17)

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 truly deliver this, we believe that it will also be important to incorporate multifunctional blue-green infrastructure which will help to tackle the climate change and biodiversity emergencies as well as provide valuable green space. The COVID-19 pandemic highlighted the importance of high-quality green space therefore we recommend that this is also included in the list of potential uses.

### 4.4 Key Design Principles (p. 18)

We strongly support the 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. However, we think that it is important that the Framework reflects upon the success of previous phases of development and identifies how this can be improved. Pedestrian and cycle links should be prioritised over other vehicles, particularly where movement within the site is likely for example between office buildings, shops, nurseries etc. The previous key principles set out in Section 3.1 (p. 11) include active travel access both to and around the site. Whilst we understand that these will be carried forward through the consolidated Framework, the updated Key Design Principles in Section 4.4 (p. 18) focuses on safe routes throughout the development and vehicular access to the site. We recommend this is changed to ensure that it emphasises the need to consider active travel to the site as well as within it.

Whilst we generally support the principles protecting natural features and biodiversity and improving wildlife, we consider that these should be strengthened to ensure delivery which is particularly important given the twin climate change and biodiversity loss crises. Therefore we recommend amending the text as follows: *"All opportunities to maximise the biodiversity value of the site should be taken from the outset of the design process"*.

### 5.1 Access Strategy (p. 20)

The network of paths and creation of a multifunctional set of spaces in and around The Fourcourt. To truly create multifunctional spaces, we recommend including multifunction blue-green infrastructure which is integrated with the network of paths to create a blue-green network across the site.

5.2 Connectivity & Circulation (p. 21) As highlighted above, we strongly support the creation of a path network to and within the site however we note that in relation to the A944 the Framework states that “For the south west section of the site a new vehicular access to/from the A944 may be possible”. Given 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. We also consider it important to provide multiple benefits and there are opportunities to deliver this through the integration of a blue-green network with the path network. It would be beneficial to clearly show this on in Figure 13 to ensure that developers are clear as to what is expected of them and that green networks are considered at the outset.

5.4 Building Form & Parking (p. 24) We welcome the creation of buildings clusters to create vibrancy, interaction and activity at street level. This also presents an opportunity to incorporate high-quality pocket green spaces as a focal point for interaction.

#### **Building Heights**

The intention to develop a “building of height i.e., 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 therefore lower heights of buildings are preferable to respond to the surrounding more rural/peripheral context. Additionally, if the landscape framework is truly to accommodate and provide a setting to any built development, by turn the scale of any building needs to respond to the likely mature heights of any proposed woodland planting. Greater elevation means there is less opportunity to locate buildings above a certain height without introducing significant adverse landscape and visual effects. We think that ideally the heights of the existing buildings in the Prime Four development should be used as a guide for any new development to maintain a consistency of design.

We recommend that the Framework clearly sets this out and stipulates the appropriate number of storeys for the development rather than leaving this to be considered at “the time of the proposal”.

5.5 Historic Environment:  
Woodland Exclusion Zone (p. 29) We strongly support the inclusion of a buffer and localised areas of open space relation to the ancient woodland. These are key features which should be part of the site design and used as an inspiration for further woodland across the site.

6.1 Landscape Principles (p. 31)	<p>The key objective to incorporate new buildings into the landscape character in a sympathetic manner is welcomed and presents an opportunity to reinforce the landscape character across the site. We also welcome that landscape features such as the ancient woodland, dykes and tree belts have been acknowledged as assets and opportunities rather than simply constraints.</p> <p>We are also pleased to note that detailed tree surveys will be carried out, informing the retention of trees and design.</p> <p>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 the existing blue-green infrastructure assets as well as identifying the opportunities. As highlighted above, this could be done in conjunction with the active travel network to ensure that they are integrated and multiple benefits are embedded.</p> <p>We welcome the recognition of the amenity opportunity presented by the SUDS basin in the northern zone of the remaining site and consider that this could be integrated into the site design as a multifunctional feature which is attractive and accessible.</p>
6.3 Landscape Framework (p. 33)	<p>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 effects for biodiversity.</p>
7.1 Key Principles (p. 35)	<p>We welcome these principles, however, we think that multifunctional blue-green infrastructure including green space should be included as a key principle.</p>
7.2 Drainage: SUDS and Drainage (p. 37)	<p>As noted above, there is an opportunity to integrate the SUDS basin into the site design as an attractive and multifunctional feature, ensuring that opportunities to maximise the biodiversity value are taken.</p>
7.4 Infrastructure (p. 39)	<p>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.</p>



## 8. SEPA - Clare Pritchett

Dear Laura

Thank you for the consultation below (and for the meeting last week).

Just to confirm that I reviewed the attached **Prime Four Business Park Development Framework 2021** and had no site specific comments in relation to SEPA's interests.

Kind regards

Clare