

Dear Laura,

Thanks for your email.

We do not have any comments to make, as the application of the relevant Local Development Plan policies should safeguard the natural heritage interests in this location.

Best wishes,
Isla

Isla Martin
SNH
Inverdee House
Baxter Street
Aberdeen
AB11 9QA


From: Cowe, Ian [mailto: [REDACTED]]
Sent: 31 May 2016 12:21
To: PI
Subject: OP63 Prime 4 - FCS Consultation Response

Dear Sir/Madam

Draft OP63 Site, Prime Four Business Park Development Framework

The development site abuts Ancient Woodland of Long Established Plantation Origin (West Hatton Wood), this woodland site is known to have been woodland for more than 140 years. It shows in the Native Woodland Survey of Scotland as existing as predominately native tree species and has been assessed as being 100% semi-natural in nature.

This woodland is a priority habitat as identified in the UK Biodiversity Action Plan.

The Scottish Government's Policy on the Control of Woodland Removal defines this type of woodland as having a strong presumption against removal.

Forestry Commission Scotland welcomes the sensitive proposals outlined in relation to this woodland, including the development buffer around the woodland and the newly proposed connected hedgerows. I recommend these are planted with locally relevant native species.

Regards
Ian

Ian Cowe - Development Officer
Forestry Commission Scotland – Grampian Conservancy
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From: Neil Taylor
Sent: 21 June 2016 11:26
To: PI
Subject: OP63 Prime 4

Hi there

The plans for the site I think are acceptable within the site context.

However my main concern is overdevelopment of the A944 corridor if Phase4, Phase 5 and the New Aberdeen Football Stadium are approved on the opposite side of the AWPR.

Houses in the near area will suddenly be in the middle of a transport/business/stadium development that is most definitely not rural as when purchased.

Thanks

Neil



Our ref: PCS/146934
Your ref: OP63 Prime 4
If telephoning ask for:
Clare Pritchett

23 June 2016

Laura Robertson
Aberdeen City Council
Planning & Sustainable Development
Business Hub 4
Marischal College
Aberdeen
AB10 1AB

By email only to: pi@aberdeencity.gov.uk

Dear Ms Robertson

**Town and Country Planning (Scotland) Acts
Draft OP63 Site, Prime Four Business Park Development Framework
Phase 4, Prime Four Business Park**

Thank you for your consultation email of 19 May 2016.

We have reviewed the Site OP63 Prime Four Business Park Framework prepared by Halliday Fraser Munro on behalf of Drum Property Group and have the following comments.

Advice for the planning authority

1. Flood Risk

1.1 The application site is completely outwith the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map. In addition it would appear that there are no watercourses running through the site or along its boundaries. SEPA Flood Risk hold no records of any past flooding at the site. Therefore in terms of our interests we do not require an assessment of flood risk for this site.

2. Surface Water Drainage

2.1 We **request** that confirmation is provided that the SUDS proposals have been designed in accordance with the CIRIA SUDS manual C753 www.susdrain.org/resources/SuDS_Manual.html. We note that Phase 1 contains a SUDS pond and we **request** that it is clarified why these cannot be provided in Phase 2.



Chairman
Bob Downes
Chief Executive
Terry A'Hearn

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www.sepa.org.uk • customer enquiries 03000 99 66 99

3. Peat Management

- 3.1 We note that peat was found on site in the development of Phase 1. We request that a statement is provided on the actions that will be taken for peat management, including its re-use, if peat is identified in Phase 2.

If you have any queries relating to this letter, please contact me by telephone on 01224 266609 or e-mail at planning.aberdeen@sepa.org.uk.

Yours sincerely

Clare Pritchett
Senior Planning Officer
Planning Service

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at the planning stage. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. If you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found in [How and when to consult SEPA](#), and on flood risk specifically in the [SEPA-Planning Authority Protocol](#).



Ms Laura Robertson
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Direct Line: [REDACTED]
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[REDACTED]
Our ref: LDP/A/2
Our Case ID: 201600938
Your ref: E:OP63PRIME4
01 July 2016

Dear Ms Robertson

Aberdeen City Council - Draft OP63 Site, Prime Four Business Park Development Framework Consultation
Statutory Designation: Kingswells, consumption dykes 415m N and 685m NNE of Home Farm
Designation Reference: SM108

Thank you for your letter of 19 May 2016 seeking our comments on the draft Development Framework for the OP63 site at Kingswells. The following comments are based on our statutory historic environment interests. That is scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes and battlefields in their respective Inventories. We would advise you also seek comments from Aberdeen City Council's Conservation and Archaeology Services who will also be able to advise on the potential for significant impacts on the historic environment and of potential impacts and mitigation for any sites of regional and local importance.

We welcome the consideration given to the historic environment within the development framework. In terms of our statutory interests our comments here relate to the scheduled monument *Kingswells, consumption dykes 415m N and 685m NNE of Home Farm (Index no.108)*. We note that the development framework considers that the proposed works within the OP63 site are unlikely to affect the setting of the consumption dyke as the ancient woodland between the two sites is to be retained. We are content to agree with this conclusion and therefore have no further comments to offer.

Should you wish to discuss any issues raised in this response please do not hesitate to contact me on the above details.

Yours sincerely

[REDACTED]

Andrew Stevenson
Senior Heritage Management Officer (SEA)

Nigel Dower,
Clerk, North of Scotland Quaker Trust,

OP63 Prime 4
Ms Laura Robertson,
Masterplanning, Design and Conservation team,
Enterprise planning and infrastructure,
Aberdeen City council,
Business hub 4, Ground floor North, Marischal College,
Broad Street,
Aberdeen, AB10 1AB

3 July 2016

Dear Laura Robertson,

Developments surrounding the Kingswells Quaker Burial ground – OP63

Thank you for meeting us on Thursday 23rd June to go over various points. This is appreciated.

We write to you as the Custodians of the Kingswells burial ground and have read, with interest, the development plan for the area surrounding our burial ground. Following our meeting on 23rd, we realise that many of our questions and points are really for the developer to answer and would appreciate your reinforcing this where you think is appropriate. Second, you have answered some of the queries in our earlier communication with you so the points below have been modified accordingly.

I should also add that we appreciate that the plans do take seriously the preservation of the burial ground and show respect for its religious and historical significance. Whilst we are not opposed in principle, we do have a number of concerns over how the development may impact on the sanctity and security of the burial ground.

Our main concerns are:

1. 20 m Buffer Zone

It would appear from the brochure that our burial ground will 'benefit' from a protection zone of some 20 metres. But it is also clear that the site will be bordered on at least two sides by peripheral roads, which may in the future become a significant entry point for the site as a whole. We have concerns that the developer states it may be necessary to remove and replace some parts of the boundary wall of the burial ground. This would also involve removing some of the trees growing around the burial ground. However, when we met, you reassured us that this concern is unfounded.

We would welcome clarification of what will be included within the buffer zone e.g. is it just open space or trees or paths? We would also question whether it is wide enough in order to protect the sanctity and ambiance of the burial ground, particularly if nearby buildings are tall. We appreciate that the buffer zone would not in any case be a neat rectangle, and suggest that 30 m might be more appropriate at some points, with a minimum of 20 m.

2. Future Maintenance and Insurance

We are concerned about the future sanctity and security of the site as we wish to preserve the memory of those buried there and the spirit of the Society of Friends honoured by the presence of the site. We are currently responsible for the periodic maintenance and upkeep of the trees and surrounding walls of the site. We are concerned that with the potentially increased pedestrian traffic around and onto the site during construction and once the project is completed and occupied, that the requirement for such maintenance will be considerably increased. We would be grateful if you could make it clear to the developer and future managers for the Business Park that the costs of such an increased maintenance and possible insurance burden will be borne by them.

3. Interpretive Information and Seating

It is suggested that on completion of the development, a 'display board' would be erected adjacent to the burial ground. Clearly, as Custodians of the site, we request to be involved in the design and content of such an information board and seating. We would be grateful if you could request that the developers contact us at the appropriate time to discuss this.

4. Options for a road around the site

We have some concerns about the possible roads around the site. Options are shown to the north or south. It is difficult to judge this without being on site and without knowing more about the size and location buildings adjacent, which will be the least intrusive. It also depends what is built on the land to the south, though you indicated that there is no longer a stepped building planned to the south west. The road to the south may be preferable if it is sunken as it would result in the site being more open. A road around the north side may be more intrusive unless it is located further back from the burial ground and with more screening. However we do not feel we can indicate a final preference until we have more information.

5. Link Road through to A944 (p38)

This would almost certainly increase the level of traffic flows past the burial ground and would be of some concern. If another access onto the A944 is to be permitted or welcomed, what is its likely impact to be?

6. Western Hub with Eatery and access to the Burial Ground

This is a very sketchy proposal at this stage but could be a major concern regarding impact on the burial ground. There is of course the possibility that food would be taken out from an outlet that is very close to the burial ground and taken into the burial ground, especially if this were to be or include a fast food facility; likewise if another fast food outlet were situated in the vicinity within walking distance. Whilst we are not of course against members of the public having access to the burial ground, there is a very real danger that, if such food is taken into the burial ground, there would be litter left, the place used in a noisy way inappropriate to such a site, or otherwise not treated with respect. We would therefore be very concerned and unhappy with any proposal to include a fast food take away in the proximity of the burial ground.

More generally, in terms of access to the Burial Ground either from the eatery or from other nearby buildings, would we have a say on whether we want to encourage people to go to the burial ground? e.g. whether there might be benches outside it, or whether the access to it was on a side that would encourage people to go in or not.

7. Proposal for larger and taller buildings around the burial ground in order to create a visual marker or statement (p42)

We are concerned about the likelihood that such building would dominate and overshadow the burial ground. We suggest that the massing of the buildings should be carefully considered for their impact on the burial ground and that they should be stepped and set back within their sites, and the buffer zone increased in width. We trust that the formal buffer zone does not come up abruptly with a building but that further space such as car parks will be between the buffer zone and the building.

8. Status of the Masterplan document

We are pleased to note that this is not the last chance for us to make comments on this development and that when from September onwards more detailed proposals are made about buildings and roads near to the burial ground, we will have a further chance to comment, and at later stages.

With best wishes

Yours sincerely,

Nigel Dower,



Aberdeen Cycle Forum Response to OP63/Prime Four Phase Four

The Aberdeen Cycle Forum is committed to seeing safe, cohesive, and efficient cycle links from Aberdeen, Westhill, and elsewhere to the Prime Four site. Currently, there are some excellent examples of good cycle infrastructure at Prime Four, however, there are other examples of deliberate flouting of the national transport hierarchy as well as infrastructure that is dangerous and potentially deadly. We have been very vocal about the need for these links from the beginning of the development. We have spoken with employees of Prime Four individually as well as business corporately. At both levels, there is a desire to access the site using sustainable transport. While the Westhill Cycle Path (WCP) is heavily used for cycle commuting, it is also used for recreation. While many users are accessing the Prime Four site, others are trying to bypass the site either cycling to Aberdeen or Westhill. The current infrastructure follows Cycling by Design where it is convenient, but opts to ignore guidance where this may prove inconvenient to motorists. We petitioned formally regarding the narrow section of path to the west of the main development entrance on the A944 to the city council. The council's response was that perhaps mitigation could be achieved at the next stage of development. We are at that next stage.

Within the OP63 site, internal links appear adequate, but we await further clarification of cycle infrastructure. The documentation does indicate that access to this site, as to previous phases, is along the A944. There is also, potentially, a path through the site as well. Again, clarification would be needed to be certain that this could be an alternate route for users continuing their journey and not stopping at Prime Four. We again point out that the WCP, west of the main entrance on the A944, is inadequate. It is dangerous. It is sub-standard design. It is particularly problematic as it not only for cycling but for walking also. The OP63 site puts forward this section as part of its cycle links.

The documentation indicates that the development is still highly sought after and likely to have a steady uptake of occupation in the planned buildings. The WCP will only increase in traffic if this is the case. Other developments in close proximity are also liable to increase the traffic. As mentioned above, many cycle commuters or recreation cyclists will be using the Path while not needing to access Prime Four. If an alternate route is planned through the development instead of upgrading the Path, access would need to be efficient/direct and very clearly marked.

We are glad that the necessity for cycle infrastructure at Prime Four has already been identified and that it is intended to link with existing infrastructure. However, greater care is needed than has been demonstrated at early phases.

Specific concerns:

Section 3.2 – the need for a cycle connections within the development and to the Park and Ride is highlighted, but does not mention anything about the ongoing problems with the interaction with the Westhill Cycle Path. If new portions of Prime Four are to connect to everything mentioned in the document, upgrading the WCP or rerouting will be necessary.

Section 3.3 - 'Links to the wider path and cycle network have been provided at the main access on the A944 and via the pedestrianised route to the north of the Park and Ride. A solution to 'ensure no barrier or significant detour is created' to the cycle network by 'the provision of a priority crossing point, or raised / colour surfacing for the cycle route as it crosses the access road' could not be identified that satisfactorily complied with the roads technical requirements. Therefore, a full pedestrianised crossing was formed.' With respect, all solutions were not attempted.

Section 5.10 - 'The Aberdeen/Westhill cycle route travels along the southern boundary of Prime Four. Access to the cycle route has been provided via the main access point on the at the A944 junction. There is potential for improvements to be made to this route, these will be considered in more detail through future Transport Assessments.' Future assessments will be welcome, but the need for a plan for a cohesive, attractive cycle route past and through the development cannot be an afterthought. The connections for active transport should follow the national hierarchy. Thus, the links for pedestrians and cyclists to the site should take priority over those for motorised vehicles, particularly single-occupancy vehicles.



Laura Robertson

From: PI
Sent: 04 July 2016 11:24
To: Laura Robertson
Subject: FW: ACC/LDP/02 - Draft OP63 Site - Prime Four Business Park Development Framework - Statutory Consultation - Transport Scotland Response

From: [redacted] [mailto:[redacted]]
Sent: 04 July 2016 11:19
To: PI
Cc: [redacted]; [redacted]; [redacted]
Subject: ACC/LDP/02 - Draft OP63 Site - Prime Four Business Park Development Framework - Statutory Consultation - Transport Scotland Response

Transport Scotland has reviewed the Prime 4 Business Park Framework document and provides the following comments for consideration.

Development Phasing

The Framework indicates that the new allocation of land at Phase 4 (OP63 in the LDP) will be the next phase to be brought forward. The Framework also indicates that Phase 5 (OP40 allocation, renamed OP29 in the LDP) will be the final phase to be developed. However, we are aware of discussions regarding the creation of a new access from the A944 to serve Phase 5 which would appear to add some uncertainty around the intended order of phasing. The Framework does not set out the rationale for a new access from the A944. These discussions would therefore appear to be going against the principles of the Framework and risk disregarding appropriate appraisal and planning process.

Potential Impacts

Irrespective of the issues associated with the location and form of any new access on the A944, Transport Scotland's primary consideration will be the impacts which further development in the area would have on the operation of the strategic transport network, specifically at the AWPR/A944 Kingswells junction. Transport Scotland consider that a cumulative assessment which considers both Phase 4 and Phase 5 is required to inform consideration of further development on the site. This assessment should determine the potential impacts on the trunk road network and consider deliverable mitigation measures where appropriate.

Internal Connectivity

The Framework appears to illustrate contrasting internal access arrangements. Section 1 details the current circulation strategy delivered within the site in Figure 5 (page 8) including a 'potential vehicle route' into Phase 4 and an 'indicative vehicle route' into Phase 5 from Phases 1, 2 and 3. Conversely, Figure 9 on page 12 outlines the 'Updated Framework' which shows the current status of development at Prime 4. This Figure shows a 'proposed building' where the road/cycle and pedestrian links were previously located linking Phases 1, 2 and 3 with Phase 5. On this figure, Phase 5 appears to be a standalone development with a potential indicative access from the A944. This position is reinforced in Section 2 of the Framework on Figures 54, 56 and 66 which detail an indicative internal road layout within Phase 4 linking into Phase 5 at a later date. It would therefore, appear that the Framework has altered the potential internal access arrangements with Phase 5 only linking into Phase 4 subsequent to Phase 4 being built out. However, there is, as outlined in Figure 5, sufficient space and land to connect Phase 5 with

Phases 1, 2 and 3 as well as with Phase 4. This could improve internal connectivity and may negate the need for an additional access point with the A944, however this would be for Aberdeen City Council to discuss with the developer.

We would encourage further engagement and discussion on the above matters to inform progression of the Framework and potential development opportunities.

Kind Regards,

David Torrance
Major Transport Infrastructure Projects
Technical Analysis Branch



Transport Scotland
Buchanan House, 58 Port Dundas Road
Glasgow, G4 0HF

Transport Scotland, the national transport agency
Còmhdaill Alba, buidheann nàiseanta na còmhdaill

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

Introduction

Kingswells Community Council (KCC) makes the following comments on the Draft Framework Document for the OP63 site within the Prime Four Business Park.

This response is written before the Local Development Plan (LDP) has been approved and whilst the OP63 site is under review by the Reporter. As such the response is written with the following assumptions:

- the Reporter approves the OP63 site for development in the LDP
- the Reporter does not ask for any changes to the wording of the LDP.

If any of the above assumptions prove to be invalid then KCC reserves the right to make additional comments.

The official view of Kingswells Community Council is that the OP63 site is not suitable for this type of development and if there is a need for additional office space then a more suitable site should be found within the Aberdeen City strategic growth area.

The need for this expansion is questionable considering the recent request by the Drum Group for the change of use for the original Phase 4 (now referred to as Phase 5) of the Prime Four site to retail, food and drink and other uses other those that identified in the LDP.

KCC considers the timing of the issue of this document before the approval of the LDP and indeed during the review by the Reporter as a manipulation of the planning system. This view is further justified by the request for the change of use described above. The original Phase 4 area is low-lying and more suitable for the tall buildings proposed than the hilltop development proposed for OP63.

For ease of reference the section headings in this document refer to those used in the Framework document.

Communication and Engagement

Section 4.1

The document suggests that there has been a lack of community engagement . KCC has been fully engaged throughout the life cycle of the Prime Four Development and has adopted a philosophy to only identify issues that make a real difference to the community and to let ACC planners act as guardians to ensure the other technical issues are handled in an appropriate manner. KCC concentrated on the integration of the development into the rural setting of Kingswells and assumed that Drum Group would deal with the internal workings of the development.

The lack of comment should not be construed as lack of interest. The comments made by KCC on behalf of the community should be given even more credence as we have already removed any minor comments. All our comments are significant concerns and they should not be dismissed.

Protection of Heritage and Features

KCC does not accept that the introduction of the AWPR gives Drum Group the right to destroy the landscape setting of the area. The AWPR will merge into the landscape and will, in time, have less impact. The proposal to have significant buildings and skyline development will change the landscape forever, and this type of development should not be allowed in the Framework. The original agreement with the community to minimise the visual impact of the development from the surrounding area should be respected.

Impact on Landscape

See above comments.

KCC do not agree that the first phases of the development have been located sensitively within the landscape and more effort is required to minimise the impact on the landscape. Despite promises made by Drum Group that “the development would not be seen from anywhere”, the development is highly visible from a significant distance from the site. Tighter control is required going forward and no development should be allowed above the tops of existing trees, including those in West Hatton Woods, and any reference to prominent development should be removed from the Framework document.

Section 5.1 The Site

Note: timings for walking from Kingswells are extremely optimistic, and are likely to be measured from the Kingswells boundary. A further 15 minutes should be added for travel from the village centre and 30 to 45 minutes should be added for travel from the Derbeth / Concraig Area.

Section 5.5 Surrounding Context

The woodland to the north and east of the site can only offer screening if the buildings within the site do not breach the tops of trees and lighting does not penetrate the deciduous tree line in winter.

Section 5.6 Ecology

We accept the summary information about the ecology of the site. We have previously stated our concerns about the encirclement by buildings of the Local Nature Conservation Site at West Hatton Woods. Increased shading by high buildings during daytime and light pollution at night are bound to have an adverse impact on biodiversity in the woods and reduce their value as a corridor for wildlife. Any development on OP63 should include a commitment by Drum Group to manage the woodland sensitively in order to sustain and broaden their biodiversity. Access paths through the woodland should not be part of any plans going forward.

Section 5.7 Heritage and Archaeology

KCC does not accept that the proposed development “will not affect the setting of the consumption dyke in any way”. The only way to ensure this happens is to extend the “no build” zone introduced in the original Masterplan westward into the OP63 site. KCC insists that the “no build” zone that extends for 120m on both sides of the consumption dyke should be extended westwards (see the blue area shown in Figure 1). Within this zone there should be no development above the tree tops, and development should be set back and aligned to eliminate light pollution through the trees in winter when leaf cover will be reduced. The level of the tree tops varies, and 'no development above tree tops' should be interpreted literally, an no part of any building should be visible when viewed from the north and east of the development.



Fig 1: Proposed Exclusion Zone

Section 5.11 Landscape

KCC agrees that the landscape has been changed by the Prime Four development and that it will be changed by the AWPR, but neither of these facts give future development the right to destroy the landscape. Every effort needs to be taken to minimise the impact of the development on the local area.

KCC also agree that lighting on the night sky needs to be considered not only as part of future planning applications, but the existing level of lighting permitted needs to be reassessed and reduced.

The Framework document makes claims about how great the development is, and the development when viewed from within the site is a fine example of a business park. However, the impact on the landscape is much more than agreed with the community, and efforts need to be made to redress the situation. (Note: height of trees in ancient woodland quoted as 15-20m.)

Section 6.2 Key Objectives

The following quotes cause KCC some concern.

"The proposed landscape strategy will be informed by existing natural features. Buildings, street patterns, spaces, skylines, building forms and materials are to enhance the sense of identity and carry on the high standard already delivered in Phases 1-3."

"The proposals will create the opportunity for a landmark development signalling a gateway to the city at the AWPR junction and promote visually stimulating architecture when viewed in passing."

KCC are concerned that if the landscape strategy adopted in phases 1-3 is continued then the sense of identity of the Kingswells Community will be lost forever. The strategy seems to be to make the buildings in the business park as prominent as possible. This is good for the business park but it destroys the setting of the village which is low profile and is essentially hidden in a low lying area with effective screening.

The Community Council has worked with Drum Group to try to make the development as good as it can be, and to make it acceptable to the community. We made few demands: maintain the setting of the consumption dyke and arrange the buildings to make them as inconspicuous as possible when viewed from the north. We were promised that the buildings would be concealed by the existing mature trees.

The reality of phase 1-3 is that the tree cover was removed along the A944, and the tallest buildings were built on the highest points of the site. The best views of the consumption dyke have been screened by feature landscaping (mounds) and will be further concealed in the future by the new tree planting.

The sense of identity of the village is important to the residents and their wishes appear to be being ignored by the developer and ACC's Planning Department. We ask that the views from the north and the east are preserved. They do not need to be enhanced by further landscaping or screen planting. They cannot be enhanced by any more views of the buildings within the proposed development.

The setting of the consumption dyke is important to the residents and it should be important to Drum Group and ACC. Some redesign of the eastern boundary of the northern park is required to reinstate the once magnificent views of the consumption dyke. This can be done by some regrading work to reopen the views of the dyke from the C89 travelling north and relocating some newly planted trees. The natural backdrop to the dyke when looking west is the ancient woodland. This should not be destroyed by the introduction of buildings appearing above the tree tops or by light pollution through the trees in winter time when the leaf cover will be removed.

We ask that the height and layout of the buildings closest to the ancient woodland address the concerns outlined above. Any landmark buildings should be viewed from the west / AWPR. Phase 4 (now called Phase 5) has the lowest contours and is most suitable for the tallest buildings. The design of any future phases must ensure the existing tree cover screen the site. Having buildings appear over the tree tops destroys the natural setting. The architectural beauty of the buildings can be best appreciated from *within* the development site.

The whole site will be a landmark, and there is no need for any especially tall buildings to highlight the development when viewed from a car travelling at 70mph.

KCC request that the wording of the Framework incorporates the views of KCC and the community.

Section 6.3 Response to the Historic Environment

KCC appreciate that Drum Group has stated that there will be no impact on the setting of the consumption dyke from the development, but these statements need to be backed up by also including the mitigating measures required to ensure that this is achieved in practice. The consumption dyke should be included in this section. Mitigation should include height restrictions to ensure plant rooms are below the tree tops, and buildings are well set back to reduce light penetration through the trees.

The height of trees is not quoted consistently in the document. 15-20m is quoted and so to is 20-25m. In reality the height of trees varies across the site, and the actual heights should be used when designing specific buildings.

Friends Burial Ground

KCC would like the following modification:

“Any building within close proximity to the 20m buffer zone will require to take cognisance of its setting through the use of sensitive design and materials.”

should be changed to:

“Any building within close proximity to the 20m buffer zone will require to take cognisance of its setting through material selection and the use of sensitive design including building height and by increasing the effect of the buffer zone using car park layout.”

The image in Fig 47 appears to be satisfactory, but the presence of a dominating building in the immediate vicinity of the photo would change this opinion.

KCC would favour a road layout that passed in low profile to the north of the Friends Burial Ground, but reserve the right to comment on this at the application stage.

Ancient Woodland

KCC is concerned that a 10m buffer may not be sufficient when considering future maintenance that may require felling of some trees 24m high. The design should include a 10m buffer to the car parking area, and this would avoid buildings creating dark spots which cast shadow on the nearby woodland. The buffer zone between any building and the adjacent trees should be at least the height of the adjacent trees.

KCC welcomes the creation of settings similar to that shown in Fig 51.

Section 6.4 Landscape

The content of this section is largely satisfactory, particularly in relation to dyke preservation/creation, native planting and design of the SUDS area. The long-term viability of the “birch grove” planting needs to be checked – birch as a species has variable success in the local area. Any felling/pruning of existing trees should be kept to an absolute minimum, especially with any less common species such as wych elm. As already mentioned, any buildings near to the Friends’ Burial Ground should be low-profile and sensitively positioned. This is not the right location for a high-profile “hub” building.

Section 6.5 Connectivity & Circulation

Vehicles

A landmark building, if sensitively designed to fit the rural setting, could be made prominent when viewed from *within* the development and possibly when viewed from the AWPR. However, KCC would like views from the AWPR and A944 and any other affected location to be included in this Framework document. We reserve the right to make comment on the additional information. The best location for a landmark building would be the lower part of the site.

Parking

KCC requests that any decked areas of parking should incorporate screening using landscaped features. The wording could be changed from:

Where topography allows, decked structures should be investigated to minimise the surface area of parking, if these can be provided without prejudicing the key principles above (fig. 58).

to:

Where topography allows, decked structures incorporating landscaped screening should be investigated to minimise the surface area of parking, if these can be provided without prejudicing the key principles above (fig. 58).

Section 6.6 Buildings

KCC would like clarification on what the intention is for the area to the west and south of the Friends' Burial Ground. Fig 61 suggests the area will be used for 3-4 storey stepped buildings whereas Figs 39, 58 and 60 do not show any buildings.

KCC is concerned about the impact the prominent building in the Hub will have on the setting of the Friends' Burial Ground. The location of the Hub on Fig 54 and 56 is different to Fig 53 on P41 (assumed to be Fig 59)

KCC requests that a comprehensive set of sketches of the development from different viewpoints outside the development are prepared. This would be required before any comment on the heights of buildings could be made. We would also like some indication of how the intended heights of buildings on the OP63 site relate to the buildings in Phase 3.

KCC does not accept that there is a need for a focal point. Fig 54 demonstrates that the whole of the western boundary is visible from the AWPR and the whole of the southern boundary is visible from the A944. The whole of the south eastern corner of the site and views from the north are already very prominent. Building on the exposed southern edge of the development will be very prominent and there is no need for any especially tall buildings to highlight the site and make it any more visible than it will be. Effort is required to ensure the buildings fit into the rural landscape. The existence of the AWPR does not relieve Drum Group of any responsibility to ensure the development fits in with the existing setting. The AWPR will mellow with time, whereas this is not the case with over dominating buildings built on high ground.

Conclusion

KCC would like the additional information outlined above to be provided separately to allow KCC an opportunity to make comment. The above concerns made by KCC on behalf of the community must be incorporated in the text of a revised version of the Framework. The revised document should be an agreement by Drum Group, the community and ACC on the form of a suitable development for the site. Further work is required prior to approval by ACC. It is more important to get it right, and agreed than to rush the approval of this version of the Framework for OP63 through the planning system.