

Archibald B (Brian)

From: Archibald B (Brian)
Sent: 02 June 2016 17:06
To: 'tstraiton08@gmail.com'
Subject: FW: Response to Proposed Aberdeen Local Development Plan
Attachments: OP63 - response to Reporter May 2016.doc

Hello Tom

I acknowledge receipt of your response to FIR 10, this will be passed to the reporter

Thanks
Brian

From: Tom Straiton [<mailto:tstraiton08@gmail.com>]
Sent: 31 May 2016 11:43
To: Archibald B (Brian)
Cc: kcc_members@kwells.org
Subject: Response to Proposed Aberdeen Local Development Plan

Dear Sir

Please find attached the response from Kingswells Community Council to the inclusion of development site OP63 in the Proposed Aberdeen Local Development Plan.

I can post you a signed hard copy if required.

Please let me know if you require any further information.

Yours sincerely

Tom Straiton,
on behalf of Kingswells Community Council

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Directorate of Planning and Environmental Appeals
The Scottish Government
Planning and Environmental Appeals Division
4 The Courtyard
Callendar Business Park
Falkirk
FK1 1XR

Dear Mr Archibald,

**PROPOSED ABERDEEN LOCAL DEVELOPMENT PLAN
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING)
(SCOTLAND) REGULATIONS 2008**

**RESPONSE FROM KINGSWELLS COMMUNITY COUNCIL TO FURTHER INFORMATION REQUEST 10
- ISSUE 07 - ALLOCATED SITES - KINGSWELLS AND GREENFERNS - SITE OP63 - PRIME FOUR
BUSINESS PARK PHASE 4/5 EXTENSION**

Kingswells Community Council has studied the responses from Drum Property Group Ltd to your questions about the proposed development of OP63. We have also studied the Draft Development Framework document drawn up by Drum Group that gives more detail about the proposed Phase 4 and 5 expansions of the business park. We have tried to focus our response on the aspects you have highlighted.

There is nothing in either of these documents that alters the views we expressed in our 2015 response to the inclusion of OP63 in the proposed Aberdeen Local Development Plan. We have serious concerns about the impact of extending the business park into OP63.

We still cannot understand why Aberdeen City Council reversed its previously negative stance on including the site in the ALDP. This reversal happened at a very late stage in putting together the ALDP, long after the main period of public consultation. A subsequent consultation event organised by the agents for Drum Group was very poorly attended so that communication to the public about the plans for OP63 was minimal.

Changed circumstances

Since the publication of the proposed ALDP there have been significant changes in circumstances affecting the local and wider area. Due to the downturn in the oil and gas industry several business parks in and around Aberdeen are lying uncompleted. Like Prime Four, these sites have good access to the AWPR. In neighbouring Westhill some large and modern office buildings have been vacated. In the medium term at least, there will be a surplus of employment land and commercial buildings in the Aberdeen area.

Ancient woodland and Quaker burial ground

The Community Council has previously explained the need to protect these areas properly. The buffer zones proposed are completely insufficient to mitigate visual and environmental impacts on them.

In its Draft Development Framework, Drum Group proposes to run a main access road around the burial ground and also locate a main 'hub' area next to it. (The existing 'hub' in Prime Four includes a tall hotel building and separate food outlet.) These proposals are highly insensitive. It is stated in Drum Group's response that the burial ground has no headstones showing - as if that detracts from its

value and interest. Historically, Quaker graves had no headstones because Quakers thought that headstones only served to distinguish some people from others.

The Draft Development Framework also indicates that buildings in the “Northern Zone”, abutting the ancient woodland, will be 4-5 storeys high with a 10 metre buffer zone to help distance them from the trees in West Hatton Woods. Other buildings in Prime Four typically have heights of 4 metres per storey, not including plant on the roof. The heights, therefore, of 4-5 storey buildings would be upwards of 16 and 20 metres respectively. Buildings of this height would cast heavy shade into what is supposed to be a nature conservation site, restricting plant growth. Many of the buildings in Prime Four are lit up at night (presumably for cleaning and/or security). Again this is incompatible with immediate proximity to a nature conservation site.

Kingswells Community Council has no confidence that buildings will not exceed tree height along sections of the ancient woodland. **Photo 1** shows the low height of the trees along the north-east edge of the “Northern Zone” as described in the Framework document.



Photo 1 Tree height along the north-east edge of the “Northern Zone” as defined in Drum Group’s Draft Development Framework.

Most of the trees are much lower than a 4 or 5 storey building. We also have major concerns that West Hatton Woods when viewed from Kingswells along the historic consumption dyke will have a backdrop of tall buildings. Even low buildings would be clearly visible through gaps in the trees. **(see Photo 2)**



Photo 2 - Consumption dyke looking west towards West Hatton Woods. Drum Group's "Northern Zone" is behind the trees, rising towards the "Plateau" area on the left.

Historic Scotland was insistent that the consumption dyke should maintain an agricultural setting as its backdrop. As a result, a 120 metre "no build" zone was agreed for both sides of the dyke in the Prime Four masterplan. In order to maintain its effectiveness in protecting the setting of the dyke, this "no build" zone would have to extend into Drum Group's "Northern Zone" on the other side of the woods. Only by doing this could the dyke be protected from the visual impact of tall buildings. If the "no build" zone were to be extended like this, the developable area of OP63 would be reduced by some 50% as the northern-most part of the "Northern Zone" would become isolated from the rest of the site. Such a move, though desirable, would not of course obviate our concerns about the rest of OP63.

Early in the development of Prime Four, Drum Group promised us that buildings would not exceed tree height and the site would be concealed when viewed from a distance. As the development progressed this promise was broken. For example, the building on Plot 10, currently under construction, is well above tree height making it highly visible from the A944 when approaching from Westhill. Drum Group's perception of a sensitive development is now completely at odds with the original expectations of the community.

Visual impact on the landscape

Kingswells Community Council maintains the view that the impact of OP63 on the landscape west of Kingswells would be unacceptable. It is both curious and very significant that Aberdeen City Council originally took the same view and had previously designated much of the site as Green Space Network.

It is the height and visual dominance of some of the buildings in Prime Four that many residents in Kingswells find objectionable, rather than their quality. Drum Group has focused on ensuring that the buildings at Prime Four look good from within the site itself. Much less attention has been given to ensuring that the buildings do not dominate the local area as seen from round about. Increasingly, tall buildings have been built on the highest parts of the site, making them very prominent in what is still a semi-rural landscape. Aberdeen City planners have been lax in controlling this. We find some statements in the Draft Framework Document for OP63 particularly worrying:

“Larger buildings could comfortably be accommodated in the plots immediately adjacent to the woodland in order to maintain visibility from the AWPR.”

“The plateau, as the highest part of the site, could be one of the most visually prominent when viewed from the south, making it the most logical position for statement buildings”.

These statements make it quite clear that Drum Group expects its buildings on OP63 to be highly visible. The prime motive is to showcase buildings for potential clients.

Effect on the green belt between Westhill and Kingswells

It is important to retain as much of the green belt as possible between the two communities to avoid future coalescence.

Drum Group states that *“The AWPRcreates a clear defensible edge to the green belt and prevents any further development westwards.”* This is unlikely to be true. Aberdeen Football Club has just recently proposed to build a 20,000 seat stadium and training facilities at Kingsford beside the A944, just 200 metres west of the AWPR. Aberdeen City Council is very likely to approve this development.

Building on OP63 will remove what is probably the most attractive part of the green belt between Westhill and Kingswells. The wooded high ground of OP63 provides a sense of place as you approach Kingswells and also a reminder of its rural past. Although there is now a prominent cutting for the AWPR on the western edge of OP63, the sides of this cutting will quickly be colonised by gorse and other plant life as witnessed elsewhere. The natural setting of the burial ground above the cutting will, in time, be largely restored. By contrast, the presence of highly visible office blocks, regardless of their quality, will permanently destroy the setting and sense of place.

View from the AWPR

In future, many travellers will be able to see OP63 from the elevated sections of the AWPR as they approach the Kingswells South junction with the A944. Drivers are likely to be slowing down as they approach the slip roads of this major interchange, and there could well be congestion and slow-moving traffic at peak times. We do not agree with Drum Group’s statement that *“Views from users heading north or south would be limited and only from a distance before entering the cutting”*. Outwith the cutting that borders OP63, buildings on the site would be highly visible from this section of the AWPR. As travellers near the Kingswells South Junction, they will have ample opportunity to see large office buildings on the landscape as they approach from the south **(see Photo 3)** and cross the flyover, or when approaching from the north before entering the cutting. **(see Photo 4)**.



Photo 3 Looking north along the AWPR towards the concrete flyover where it will cross the A944. OP63 is the tree-topped hill extending along the skyline on the right of the AWPR. The Quaker burial ground is in the tree clump on the skyline directly above the yellow truck on the right. The OP63 cutting can be seen just above and to the left of the other yellow truck.



Photo 4 Part of Drum Group’s “Northern Zone” and “Plateau” area as seen from the AWPR heading south. The Quaker burial ground is in the second clump of trees from the right at the top right of the picture.

Access to the western part of OP29 (formerly Phase 4)

Drum Group have still not provided a good reason why they are unable to access OP29 by extending the existing east-west road through Prime Four.

From the outset, designers of Prime Four had a blank canvas for OP29 with no restrictions to access. We maintain our view that any perceived restrictions to access have been engineered to justify further development.

Conclusion

Although Drum Group provides many reassuring statements about protecting and enhancing the environment, it is inescapable that development on OP63 will have a major visual impact on the landscape. Historic and natural features which are supposed to be protected will be devalued and degraded. Surrounding a Local Nature Conservation Site with buildings could easily set a precedent for planners and developers to take liberties with other such sites. There will be other implications in terms of erosion of the green belt between Westhill and Kingswells, and further traffic congestion on neighbouring roads. Drum Group has failed to explain adequately why the OP29 site cannot be developed as originally planned. The expansion of Prime Four into OP63 is unnecessary.

Kingswells Community Council supported the development of employment land at Prime Four from the outset and to date has enjoyed very good relationships with Drum Group. We accepted the inclusion of OP29. However, we view this latest expansion as a step too far in the development of Prime Four and wholly reject it.

We request that OP63 is removed from the final version of the Aberdeen Local Development Plan.

Yours sincerely

Dr Tom Straiton
on behalf of Kingswells Community Council

27 May 2016