



Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

Name	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Ian Cox (Secretary)
Organisation	Kingswells Community Council
On behalf of (if relevant)	
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Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan	<input checked="" type="checkbox"/>	
	Proposed Supplementary Guidance	<input type="checkbox"/>	
	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	Inclusion of OP63 as a site for development	Paragraph(s)	Proposed Plan page 13

What would you like to say about the issue?

See attached document headed

Kingswells Community Council: Objections to the inclusion of OP63 in the Aberdeen Local Development Plan

What change would you like to see made?

We ask that OP63 be deleted as a site for development.

KINGSWELLS COMMUNITY COUNCIL: OBJECTIONS TO THE INCLUSION OF OP63 IN THE ABERDEEN LOCAL DEVELOPMENT PLAN

Kingswells Community Council (KCC) strongly objects to the inclusion of OP63 as a new site for development in the Aberdeen Local Development Plan (ALDP). We request that it be removed from the plan.

Background

In the Main Issues Report, the site now shown as OP63 was categorised by Aberdeen City Council (ACC) as “undesirable”. In particular, ACC stated that “development on this site would intrude significantly on the surrounding landscape” and there were “insufficient over-riding benefits arising from this site which would justify allocating it for development.”

It is KCC’s view that Aberdeen City Council was pressurised by Drum Property Group to change its mind about the site. KCC considers this U-turn by Aberdeen City Council to be unjustified. Drum Property Group has argued that their Phase 4 site, which they already have permission to develop as part of Prime Four, is isolated from the road network and will be difficult to develop even with the Aberdeen Western Peripheral Route (AWPR) in place. KCC believes that Drum Property Group is using the *temporary* isolation of their Phase 4 site as a reason to press for the inclusion of OP63 in the ALDP. It is odd that it was only after the Main Issues Report that Drum Property Group highlighted access to Phase 4 as a ‘problem’. The Phase 4 site has been shown on the plans for Prime Four for at least the last 4 years.

KCC contends that Drum Property Group has requested OP63 as a device to expand its overall land allocation. Drum Property Group has not said that it wishes to substitute OP63 for the Phase 4 site. KCC believes, therefore, that Drum Property Group intends to develop *both* sites when access becomes available. Aberdeen City Council should not be supporting this as the combined land allocation exceeds the requirements of the Structure Plan.

KCC would like to make it clear that it has enjoyed good working relationships with Drum Property Group. Any differences have related to the visual impact of some of the buildings in the semi-rural setting of Kingswells. KCC approved the development of the business park from the outset and did not object to the inclusion of the Phase 4 site. However, the inclusion of OP63 as an additional site is a step too far as it will have serious visual impact on the local landscape, damage the natural environment, and have an adverse impact on the traffic on local roads.

Access

KCC has inspected the area in question and the Phase 4 site would be easily accessible by extending the main east-west road that runs through Prime Four. The end of this road is only 130 metres from the north-east corner of the Phase 4 site, across a levelled piece of ground. It is evident that this road will soon be extended further west, bringing the Phase 4 site even closer. KCC sees no good reason why Phase 4 cannot be developed using this obvious access road. It would provide continuity with the rest of the business park. Entry to Phase 4 would be via the main entrance to Prime Four on the A944.

Drum Property Group has expressed a preference to access Phase 4 (and ultimately OP63) from the AWPR. It is unclear who would bear the high costs involved. New slip

roads would need to be provided for both north- and south-bound traffic on the AWPR. This would run counter to a key aim of the AWPR to enhance traffic flows by restricting the number of on/off access points along its 28 mile length. In planning the AWPR, additional access points were deliberately avoided. Any access points to Phase 4/OP63 would need to be near the major Kingswells South junction of the AWPR and the A944, or lead off the junction directly. This would result in additional traffic congestion, especially if a large retail centre (as proposed by Drum Property Group in 2013) was located on the development site.

While access to the Phase 4 site (and thereby OP63) would in theory be possible from the A944, this trunk road is already heavily congested at peak times and another busy junction very close to the AWPR junction would be chaotic. Unlike other roads around Aberdeen, traffic volumes on this section of the A944 are not projected to be reduced by the AWPR but instead to be increased.

Provision of Employment land

Aberdeen City Council made it very clear from the outset that the new ALDP would not need to include additional employment land because the existing ALDP already met the requirements of the Structure Plan. Phase 4 of Prime Four, with an area of some 9.4 hectares, meets the necessary requirement. OP63 has an area of 10.7 hectares, allowing for the land take required for the AWPR. KCC contends that Drum Property Group is trying to acquire additional land to meet client demands for space outwith the actual requirements of the ALDP. This approach is not sustainable. The ALDP must take account of the other large business park developments under construction in and around the city, including those at Dyce and Aberdeen South, together with premises being vacated as employers re-locate to these new developments. If OP63 is included in the development plan, then the Phase 4 site also becomes immediately accessible by means of a shared access route. It is KCC's view that Drum Property Group is pressing for OP63 be included in the ALDP to justify the expense of an access from the AWPR. Combining Phase 4 with OP63 will increase the allocation of employment land by 10.7 hectares above what is required in the Structure Plan. OP63 is not needed.

Visual Impact

KCC agrees with ACC's assessment that "development on this site would intrude significantly on the surrounding landscape". OP63 is an elevated site that includes a hill top. Much of it is clearly visible from Westhill and sections of the A944. Assuming that the site will include buildings of similar height and construction to the existing ones within Prime Four, there will be skyline breaching and major visual impact on what is still a rural setting. The AWPR will be within a cutting as it passes along the western edge of OP63 so the buildings will not be obscured by the road.

The Quaker Burial Ground sits prominently in one of the fields of OP63 and will be devalued by a backdrop of modern buildings. The burial ground dates from 1673 and is one of several listed historical features in Kingswells that give our area a uniqueness and sense of place.

Impact on the Environment

OP63 is bounded to the east and north by the West Woods of Hatton which are designated by Scottish Natural Heritage as ancient woodland and by Aberdeen City Council as a Local Nature Conservation Site. The majority of OP63 was also previously

designated by Aberdeen City Council as Green Space Network in recognition of its conservation and landscape value. If OP63 receives approval in the ALDP, then Prime Four developments will box in most of the ancient woodland and ruin its capacity to serve as a shelter and corridor for wildlife.

The Scottish Government ensured that the planners of the AWPR took care to avoid both the Quaker Burial Ground and West Woods of Hatton when deciding the line of the route. KCC therefore argues that Aberdeen City Council should *not* be prepared to ruin both sites by now proposing OP63 as a major development site.