

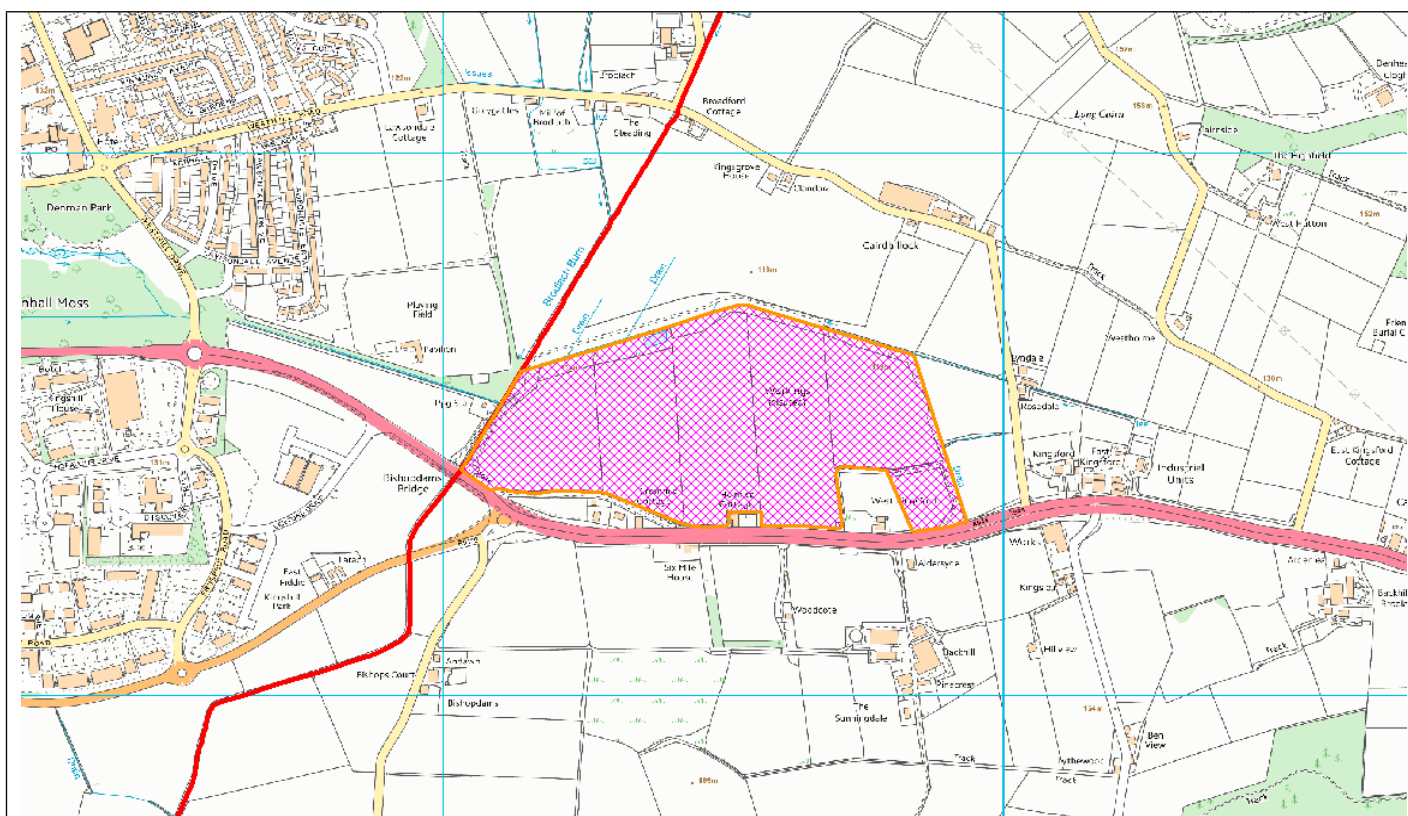


# Pre-Determination Hearing (Full Council)

Report by Development Management Manager

**Date: 13<sup>th</sup> September 2017 (Site visit Monday 11<sup>th</sup>)**

<b>Site Address:</b>	Land At West Kingsford (North Of The A944 Road), Skene Road, Aberdeen, AB15 8QR
<b>Application Description:</b>	Proposed Community and Sports Facilities, Football Academy, (comprising outdoor pitches, pavilion, ancillary buildings), Stadium (20,000 capacity), ancillary uses, formation of access roads, parking and associated landscaping and engineering works
<b>Application Reference:</b>	170021/DPP
<b>Application Type</b>	Detailed Planning Permission
<b>Application Date:</b>	11 January 2017
<b>Applicant:</b>	Aberdeen FC Community Trust & Aberdeen Football Club Plc
<b>Ward:</b>	Kingswells/Sheddocksley/Summerhill
<b>Community Council</b>	Kingswells
<b>Case Officer:</b>	Gavin Evans



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## APPLICATION BACKGROUND

### Purpose of Report

Under section 38A of the Town and Country Planning (Scotland) Act 1997 ('the Act'), the opportunity to attend pre-determination hearings must be provided in respect of applications for major developments which are considered to be significantly contrary to the vision or wider spatial strategy of the 'development

plan'. At the time of writing, the Development Plan comprises the Aberdeen Local Development Plan 2017 and the Aberdeen City and Shire Strategic Development Plan 2014.

This report provides information for the pre-determination hearing required in relation to this planning application for a major development (*comprising 'Community and Sports Facilities, Football Academy, (comprising outdoor pitches, pavilion, ancillary buildings), Stadium (20,000 capacity), ancillary uses, formation of access roads, parking and associated landscaping and engineering works'*) which is considered to be significantly contrary to the strategic development plan and the adopted local development plan.

No assessment of the merits or failings of the proposal is made in this report.

### Site Description

The site is located on land at West Kingsford, which lies on the north side of the A944 dual carriageway, between Kingswells and Westhill. It extends to an area of some 24.5 hectares. The existing settlement of Westhill lies approximately 500m to the west, whilst the Prime Four Business Park is located around 1km to the east, with the residential suburb of Kingswells immediately beyond. The Aberdeen Western Peripheral Route (AWPR) is currently under construction approximately 450m to the east of the site, with a grade-separated junction formed where it meets the A944. The western edge of the site abuts the Brodiach Burn, which at this location forms the boundary between Aberdeen City Council and Aberdeenshire Council's respective administrative areas.

The site sits in a natural bowl. The land to the north east, south, south east and north west, in particular, rises up quite significantly – some 50m to the south, 80m to the north west, 80m to the north east and 90m to the south east. There is about a 10m drop from south to north across the site. The site largely comprises a number of agricultural fields, divided internally with post and wire fencing running north/south. It is understood that the western portion of the site includes 2 historic landfill sites, and there is evidence of historic sand and gravel extraction.

To the south of the site are six houses. Four of these are clustered together along Old Skene Road, directly to the south of the proposed stadium location, and the remaining two – Holmlea Cottage and West Kingsford – sit apart, accessed via the A944 directly. In the context of the proposed development, which is described more fully below, Holmlea Cottage would be immediately to the south of 2no academy training pitches, while West Kingsford would lie in a larger curtilage to the east of those same pitches, with a vehicular access to the south-eastern corner of the application site lying some 45m further to the east. To the north of the application site is open ground, while to the east and south across the dual carriageway is agricultural land. To the west are 'Lawsondale' playing fields and an area of open ground. An access track from the A944 runs northwards through the site, close to the western boundary and leads to land beyond the application site.

### Relevant Planning History

Application Number	Proposal	Decision Date
161224/ESC	Request for EIA Scoping Opinion in relation to community and sport campus, football academy and stadium at Kingsford	22.09.2016 Status: EIA Scoping Opinion issued
160828	Request for EIA Screening Opinion in relation to community and sport campus, football academy and stadium at Kingsford	04.07.2016 Status: EIA Required
160853	Proposals of Application Notice – setting consultation proposals for a Major Development comprising Community and sport campus, football academy and stadium (Circa 20,000 capacity), formation of access and all associated parking, landscaping and engineering works. at Land at West Kingsford (North of the A944 road)	04.07.2016 Status: Further Consultation Not Required

## APPLICATION DESCRIPTION

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### Description of Proposal

This application seeks detailed planning permission (DPP) for 'Community and Sport Facilities, Football Academy And Stadium (Circa 20,000 Capacity), Formation Of Access And All Associated Parking, Landscaping And Engineering Works' on land at West Kingsford (north of the A944 Road), Skene Road, Aberdeen.

### Stadium

The proposed 20,000 capacity, all-seated stadium would be located to the western part of the site, approximately 50m from its southern boundary and 100m from its western boundary respectively. The stadium itself would measure approximately 180 metres by 145 metres, achieving a height of just over 20m and an overall footprint of approximately 24,250sqm. The stadium would be sited approximately 17 degrees off an east-west orientation, with its stands encircling the pitch completely, including the four corners. Seating within the stadium would be laid out in a single-tier 'bowl' arrangement.

The stadium's exterior would be finished in dark grey facing brick at low level, set slightly back from the coloured polycarbonate cladding to walls above. These vertical cladding panels, in shades of red through to white, are translucent and would create a subtle red glow from within the internally lit concourse areas at night. This translucency would also allow for diffuse natural light to illuminate the concourse during hours of daylight.

Externally, the south stand incorporates silver/grey aluminium rainscreen cladding which is extruded out from the face of the remainder of that elevation to surround an extensively glazed face, framed by a darker grey cladding. This glazed frontage takes advantage of the southern elevation and allows light in to hospitality suites and other internal spaces.

The south-east corner of the stadium includes a projecting section, clad in the same polycarbonate vertical cladding in shades of red and white. This extruded corner identifies the club shop at ground floor level, and its outer face above is identifies as a potential location for signage, with the club crest embossed into the cladding panels and softly illuminated from within.

Floodlighting to illuminate the playing surface is incorporated within the design of the stadium roof, angled downwards to reduce light spillage outwith the arena. The roof itself is angled at 11 degrees, achieving a height of 21m from the pitch to the underside of the roof cladding material. It would be finished with a silver aluminium cladding panel, with exposed steelwork above and below to be painted white. To the rear of the seated tier a translucent polycarbonate panelling would be used to allow in diffuse light. The seating within the single-tier stand would comprise three 'rakes', with seating becoming steeper from pitchside to the rear of the stand incrementally, at 25, 28 and 29 degrees respectively.

Internally, the ground floor areas of the North, East and West sections of the stadium are largely given over to the necessary turnstile and concourse spaces, along with toilets and concessions stands. The North-East and North-West corners incorporate back-of-house facilities including staff/groundspersons/stewards changing areas and toilets; first aid room; plant rooms and maintenance workshops; various stores and facilities for match-day police at ground floor level, with a supporters' bar (215sqm) incorporated at first floor level in the NE corner, with views out onto the pitch.

The South Stand would act as the 'main stand' and, alongside concourse and concessions areas, it would incorporate a centralised catering space; home, away and match officials changing facilities; warm-up, medical, physio and testing areas; kit storage and laundry facilities; manager's office and press conference room at ground floor level. The SE corner of the stadium would include a 'Red Café' coffee shop; AFC club shop; hospitality reception area; and ticket office. The players' entrance is located at a central point in this south stand, with access for Police and stewards to the north-western corner.

Hospitality Suites (totalling circa 1355sqm) and associated toilets and kitchen facilities would be located in the south stand's first floor, with a club museum and staff canteen/players' lounge housed in the SE corner.

At second floor level the south stand would incorporate the Club Boardroom; 24no. hospitality boxes (each with a notional capacity of 10 persons); Club and Match Sponsors' lounges; along with associated kitchen and toilet facilities. The SE corner would house the Club/Community offices, along with match control, PA room and TV studio facilities.

### **Training, Academy and Community Facilities**

On-site training facilities would include 3no full-size grass training pitches for first-team use, one of which would be floodlit, along with associated smaller training spaces, groundsman's compound, all of which sits to the north of the access road running east-to-west through the site. The professional training pitches would match the orientation of the stadium playing surface, with the aim that conditions on a match day can be replicated during training sessions.

A single-storey pavilion building, located to the south of these facilities, would provide changing facilities for both the professional training facilities and 2no floodlit synthetic '4G' pitches to the south, which would be for youth academy and community use.

The pavilion building would be finished with a combination of dark grey facing brick and silver/grey aluminium rainscreen cladding panels, with brick sections set back from the cladding to provide some articulation to the façade. High-level, horizontally proportioned windows are used to bring light and ventilation to changing spaces. It is envisaged that AFC professional staff would use office and changing facilities within the pavilion prior to construction of the stadium, after which they would relocate to facilities within the stadium itself and vacate these spaces for use by the AFC Community Trust and other community groups. 42no car parking spaces are shown adjacent to the pavilion building.

### **Fanzone**

A 'fanzone' area is proposed between the east stand and the pavilion building. This would extend across the hard landscaped area between these buildings, and is conveniently positioned relative to the supporters' bar, club shop and Red Café facilities within the east stand. Bus turning and shuttle-bus pick-up facilities are located immediately nearby to the north of this area. The submitted Design and Access statement and later addendum refer to this area becoming a focal point for supporters on arrival to the site, highlighting opportunities for a large screen to provide pre-match entertainment or club information to supporters and enhancing the match-day experience. This will be a traffic-free zone, incorporating colourful club branding. Opportunities for a well-integrated lighting strategy within this space are identified. An external power source is identified as being necessary to allow temporary stage set-up, with potential use for live music, DJ's or community music projects. This is intended as a flexible space which relates well to the surrounding facilities.

### **Car, Coach & Cycle Parking; Bus provision & Access**

It is proposed to provide 1,350 car parking spaces within the site for supporters. These are contained within three main car parks, located to the north, east, and south-west of the stadium respectively (*car park 1 to SW: 311 spaces; car park 2 to N: 805 spaces; and car park 3 to E: 234 spaces*). A further 22 spaces are provided within the training pavilion car park; 16 unspecified 'service' spaces; and 4 spaces for groundspersons, for a cumulative on-site total of 1392 spaces. Outwith the application site, the applicant has intimated that a further 600 spaces will be made available via commercial arrangement with third parties at Arnhall Business Park. The TA Addendum highlights that 250 spaces at Kingsford would be set aside for hospitality guests, with the remaining 1100 available to supporters, with tickets purchased in advance – cars will not be able to arrive on a match-day and park without a pre-purchased permit.

A visitors' coach parking area, to the west of the stadium, could accommodate up to 60 coaches for away supporters. Home coaches would park immediately to the south of this, with capacity for 32 coaches and 8 outside broadcast trucks.

The match-day transport strategy proposed is based upon a 'predict and provide' model, whereby surveys of existing travel behaviours and preferences have been used as the basis for establishing mode share, and then transport interventions are proposed in order to meet those identified requirements. Surveys undertaken by Dons Supporters Together (DST) and Aberdeen and Grampian Chamber of Commerce (AGCC) have been used as the basis for the Transport Assessment and associated strategy. It is proposed to address travel demand through a combination of increased frequency of existing bus services and the

provision of site-specific shuttle buses, operating from the City Centre and from existing Park and Ride (P&R) sites at Kingswells and Dyce, with Bridge of Don utilised in addition for European matches. The bus strategy predicts a requirement for the provision of up to 52 shuttle bus services on non Old-Firm match-days; up to 63 for Old Firm matches; and up to 69 for European games. Shuttle services would utilise various routes to Kingsford, but would not allow for pick up along their respective routes. Central Coaches, who have a fleet of 52 buses, have confirmed that they would act as transport coordinators and could provide the required number of buses by co-ordinating resources with other bus operators. All AFC match-day bus services will drop-off and pick-up from the dedicated shuttle bus area within the Kingsford site. The suggested collection points are College Street, Shiprow, Rose Street, Southerhead Road and various stops on King Street, as well as the shuttle services from the Dyce and Kingswells Park and Ride sites, with city centre services provided from Midday onwards for matches kicking off at 3pm.

It is proposed to construct three accesses into the site, one each at the eastern and western ends of the site, onto the A944, and a main access at a central point immediately south of the stadium, east of Crommie Cottage and the junction of Old Skene Road and the A944. The eastern and western accesses would be connected by the internal road network, which loops around the back/northern face of the stadium. Both of these accesses would operate on a 'left-in/left-out' basis, whereas the main central access would be a permanently signal-controlled junction, incorporating at least one right-turn lane off the A944.

The Fanzone described above is expected to have a role in spreading out the arrivals to the site, by offering entertainment/activity in the period before matches. This is anticipated to reduce the impact of arrival peaks immediately before kick-off times.

The main junction would be permanently controlled by traffic signals and would allow for at least one right-turning lane off the A944. Within the site the main access would split to serve the Pavilion Car Park/Car Park 3, to the north, and head westwards, skirting around the front of the stadium's main stand and joining up with the road from the western access to loop around the west and north of the stadium before joining the spine road through the site from the eastern access. This internal road layout would enclose the hard-surfaced pedestrian concourse surrounding the stadium.

It is proposed to provide secure cycle parking for up to 220 cycles in a single location, to the east of the stadium and associated Fanzone, just north of the Pavilion building. Footpath links would be formed between the stadium and the A944, adjacent to the main stadium access and the eastern access.

In order to prevent supporters from parking within residential areas around the stadium it is proposed in the TA to implement a Controlled Parking Zone (CPZ) for areas located within an agreed walking catchment of the stadium. It is proposed that parking controls apply during event times only, with resident permit holders being exempt from those controls. The submitted TA refers to typical hours of operation of 11am to 3pm; 1pm to 5.15pm or 6pm to 10pm, depending on event time/kick-off. Enforcement of any such CPZ would fall within the jurisdiction of Police Scotland, as parking is not decriminalised in Aberdeenshire. Separate processes exist for the promotion of a CPZ, which would require the approval of Aberdeenshire Council.

### **Landscaping**

The application is supported by a Landscape Framework, which indicates areas of strategic landscaping along the site frontage to the A944, with hedgerows and tree planting used to screen the southern edge of Car Park 1, adjacent to the west stadium access. Structure planting is also proposed along the southern boundary, between academy pitches and the adjacent residential properties at Holmlea Cottage and West Kingsford. This planting would involve a landscaped belt of at least 10m depth. A similar 10m structure belt is proposed along the eastern and northern boundaries, comprising a mix of birch and pine. Within the site, trees and other soft landscaping would be used to soften the appearance of Car Park 2 and its associated structure, to the north of the stadium. Along the western edge of the site, adjacent to the Brodiach Burn, a riparian woodland planting belt is proposed. Cut and fill would be used to provide undulating landforms at the eastern and main accesses. These would also be used to provide a degree of enclosure to a memorial garden adjacent to the main access, and would serve to separate it from the main pedestrian footpath.

### **Phasing of delivery**

The applicants anticipate delivering the proposed development in two phases. Phase 1 focuses on the formation of an access junction from the A944 to the centre of the site, providing access to the professional training facilities described above, along with groundsman's store, single-storey pavilion building with 42no

car parking spaces and 2no synthetic pitches for use by the AFC youth academy and Community Trust. This first phase would also involve initial site preparation and earthworks within the application boundary. Phase 2 comprises the remainder of the development, including the stadium itself, parking areas, access points and completion of the internal road network. Once completed, professional staff would vacate office and changing facilities within the pavilion building, moving to facilities within the stadium. The Community Trust would then utilise the space vacated within the pavilion.

## Supporting Documents

All drawings and supporting documents listed below can be viewed on the Council's website at:

<https://publicaccess.aberdeencity.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=OJMF3EBZIED00>.

The following documents have been submitted in support of the application –

- Pre-Application Consultation Report
- Environmental Statement and associated Non-Technical Summary
- Design & Access Statement
- Transport Assessment
- Flood Risk Assessment
- Site Investigation Report
- Planning Statement
- Sustainability Statement
- Socio-Economic Impact Assessment
- Drainage Assessment
- Processing Agreement
- Coloured visualisations
- Statement on Co-Location, Site Selection & Sequential Test
- Travel Plan Framework
- Transport Assessment Addendum
- Road Safety Audit Report
- Technical Note: Updated Shuttle Bus Strategy
- Economic Impact response
- FRA Technical Note: Hydrology
- Design and Access Statement Addendum
- Planning Policy Statement (City Centre Impacts)

## Pre-Application Consultation

Public events were held by the applicant between the hours of 1pm and 8pm, as follows:

- Kingswells: Four Mile House, Tuesday 26<sup>th</sup> July 2016
- Westhill: Holiday Inn hotel, Friday 29<sup>th</sup> July 2016
- Aberdeen: Pittodrie Stadium, Tuesday 2<sup>nd</sup> August 2016

These sessions were staffed by members of the applicants' project team. Display boards demonstrated the location of the site, background to the Pre-Application Consultation process, initial design/masterplanning and elements of the proposal, access and transportation matters, environmental considerations, and next steps in the process of developing the scheme and seeking planning permission. Members of the applicants' project team were in attendance to answer questions, and a dedicated email address was set up to collate feedback. In addition to these events, three further 'pop-up' events were held, using the same display materials, as follows:

- Trinity Shopping Centre, Union Street: Weds 3<sup>rd</sup> August 2016, 12 noon-6pm
- Aberdeen Central Library, Rosemount Viaduct: Fri 5<sup>th</sup> August 2016, 12 noon-5pm
- Pittodrie Stadium, Pittodrie Street: Monday 8<sup>th</sup> August, 1pm-8pm (unstaffed event)



A fourth staffed public event was held between 1pm-5pm at the Holiday Inn hotel, Westhill on Saturday 6<sup>th</sup> August 2016, following a request from Westhill & Elrick Community Council. Lastly, a 'feedback' event was held to exhibit the developed design proposals that would be submitted as part of the formal application for planning permission. This event was held at Pittodrie Stadium on Thursday 24<sup>th</sup> November 2016, running between 3pm and 9pm. Kingswells, Westhill & Elrick, and Cults, Bieldside and Milltimber Community Councils were invited to attend a preview session the evening before (Weds 23<sup>rd</sup> November). This event was again staffed by members of the project team, who were available to answer questions, and the display materials were made available on the Aberdeen FC website.

The submitted Pre-Application Consultation (PAC) Report states that the events were well-attended, with over 1000 attendees across the 4 main events. The PAC report includes a detailed breakdown of the comments received at these events, both verbally and via comment forms, and also of those comments subsequently received via post and email before the 26<sup>th</sup> August cut-off. The PAC report states that the most commonly raised areas of concern related to access and transportation, including: arrangements for car parking and potential impact on nearby residential streets; public transport and provision for match-day travel generally; and the implications for the surrounding road network at peak times.

Other commonly raised concerns related to: the green belt status of the application site land; potential ecological and environmental impacts of the development; associated impacts on residential amenity by virtue of visual impact, noise and light; and queries regarding the location and implications of the Shell and BP Forties underground pipelines. A detailed breakdown of the matters raised in feedback to these PAC events is contained in Appendix 11 to the PAC report - [https://publicaccess.aberdeencity.gov.uk/online-applications/files/4B38E4152D26DD3BEC29C42DB862E812/pdf/170021\\_DPP-PAC\\_Report-1439745.pdf](https://publicaccess.aberdeencity.gov.uk/online-applications/files/4B38E4152D26DD3BEC29C42DB862E812/pdf/170021_DPP-PAC_Report-1439745.pdf)

### **Requirement for a Pre-Determination Hearing**

The proposed development is classed a 'major development' in terms of The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009. The proposal is considered to be a significant departure from the Development Plan by virtue of it being a major development located on an undeveloped and unallocated site within the Green Belt, wherein Policy NE2 'Green Belt' of the Aberdeen Local Development Plan applies, but does not allow for development of this type.

Under Regulation 27 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 there is a requirement to hold a Pre-determination Hearing before such applications may be determined.

Thereafter, this planning application requires to be determined by the Full Council due to the provisions of Section 14(2) of the Planning etc (Scotland) Act 2006, which amends the Local Government (Scotland) Act 1973 to the effect that any planning application which has been the subject of a statutory Pre-Determination Hearing under section 38A of the 2006 Act must be decided by the Full Council. Regulation 27 of the Town and Country (Development Management Procedure) (Scotland) Regulations specifies that major developments which are significantly contrary to the development plan will require such a Pre-Determination Hearing.

The purpose of this hearing is to afford both the applicant and those who have made written representation on the proposed development the opportunity to present state their views directly to the members of the Council.

## **CONSULTATIONS**

**ACC - Roads Development Management Team** – Expresses the following statements and concerns.

- The methodology used in travel surveys underpinning the relevant Transport Assessments (TA) is questioned, as these are based on supporters' preferred method of travel, without information on the public transport/sustainable travel options relating to the Kingsford site. The Aberdeen and Grampian Chamber of Commerce (AGCC) survey relates entirely to travel to the existing Pittodrie site, which is fundamentally different in terms of its location in relation to public transport services accessible from the city centre, which include services throughout Aberdeen and extensively into

Aberdeenshire, and also its context in relation to existing housing.

- The TA addendum underestimates the proportion of car users in its modal shares by counting users of the Kingswells and Dyce 'Park and Ride' (P&R) sites as public transport users. In many cases, it is anticipated that the bus journey from these P&R facilities would represent only a small proportion of the overall journey, the majority of which would be undertaken by car. On that basis, the use of the P&R facilities would have limited benefit in removing traffic from the local network at the end destination, which is their intended purpose, and would essentially act as satellite car parks for the stadium.
- Pedestrian access from Westhill is acceptable, subject to widening of the footway between the application site and Westhill (Westhill Drive).
- Pedestrian access from the East is not presently sufficient to accommodate the volume of pedestrians that would be anticipated to travel to and from the P&R site at Kingswells. Initial discussions have identified the potential for the removal of a historic layby at the 5 mile garage (between the proposed stadium and the Prime Four business park), which ACC agree would be beneficial. However, the larger issue is that there are several areas of narrow footway where the surrounding land is outwith the hands of both ACC and the applicant. As such, the only possible improvement would be to narrow the existing 7.3m carriageway to 6.6m over the ~650m stretch of road between the Five Mile Garage and where the footway adjacent to Prime Four widens to 3m. The 0.7m of carriageway that would be reclaimed could be allocated to the existing ~2.3m footway, bringing it up to the desirable minimum 3m.
  - It is likely that the route (as it stands) would be able to safely accommodate the volume of people that would walk to and from Kingswells. However, when taking into account the likely pedestrian traffic associated with the Park and Ride, discussed below, RDM has concerns that the facility would not safely be able to accommodate all pedestrians. As such, the above improvements to the carriageway and Five Mile Garage layby should be conditioned which, in turn, would improve the safety of this route.
- The TA predicts that cycle trips will be few, and it has been agreed that cycle parking provision can be accepted at a reduced rate. Cyclists on the Kingswells to Westhill cycle route must be safely accommodated at the access junctions, and details of this may be obtained and negotiated via an appropriate.
- To serve events at the proposed stadium, a combination of (i) an increase in frequency of the existing bus service; and (ii) site-specific shuttle buses is proposed.
  - It is proposed that the existing service would drop off and collect at the Arnhall Business Park, on the opposite side of the A944. The volume of supporters travelling across the A944 necessitates a pedestrian footbridge, and the proposal could not be accepted otherwise on road safety grounds. RDM would also like to see bus laybys installed adjacent to the proposed footbridge, and secured by conditions. It is felt that the 800m walk to Arnhall is excessive for the thousands of people that are anticipated to travel by bus, and also for the staff who will travel to the stadium on a much more regular basis. The provision of laybys was previously deemed impractical due to the requirement of pedestrians having to cross the dual carriageway; however this concern is nullified as a result of the pedestrian footbridge.
  - Shuttle bus services would operate from the city centre and both Kingswells and Dyce P&R sites. As noted above, these sites are close enough to the site to suggest that they would operate akin to remote car parks, rather than as a means of removing traffic from the local network around the stadium/destination. It is proposed that these services would be augmented by a service from the Bridge of Don P&R facility for European matches. Provision for travel to non-football events has not been made clear.
- Shuttle bus services from various locations in the city centre (including the bus station) to Kingsford



have been proposed. Concern is expressed that the bus station is operating near to capacity, and assurance is required that there is sufficient capacity to provide these services. Correspondence from the bus station's commercial manager indicates that there is capacity to accommodate 10 additional X17 services per hour, but there is no mention of capacity to accommodate shuttle buses at the bus station.

- Services from different pick-up points would use slightly different routes to Kingsford, however it has been clarified that initially none of these shuttle services would pick up on route to Kingsford, meaning that users would be required to travel into the city centre before changing buses and travelling to Kingsford. Service buses will continue to pick up on route as long as they have capacity to do so. This results in a scenario where shuttle services will travel along the Lang Stracht, but residents of Mastrick and Sheddocksley would be required to travel into the city centre to get a shuttle service back out past these areas to reach the stadium site. There will be no public transport services from wider areas of the city, nor from Aberdeenshire. This is not considered to be suitably attractive to encourage supporters to make use of bus services and encourage a shift to more sustainable modes of travel. Annual surveys of use can feed into the Transport Management Plan for review and addition/removal of stops as necessary.
- The predictions made regarding the number of buses required give rise to some concern as these appear to rely upon full capacity (including standing) of all buses. This includes 27 standing on a double-decker bus and 73 standing on an articulated bus.
- It is estimated that approximately two-thirds of those travelling to the Kingswells P&R site would be quicker to walk back their vehicle than to wait for the shuttle bus, due to the lack of bus priority measures on the A944. It is considered likely that large queues for this shuttle service would discourage supporters from waiting and result in higher rates of pedestrian movement to Kingswells than have been accounted for. This in turn raises concerns about the aforementioned inadequacy of the pedestrian route to Kingswells, and therefore Roads DM has serious safety concerns over the relationship between pedestrians and high volumes of traffic at this point of the A944. It is understood that Toucan crossings are proposed for the on and off slips of the AWPR. This level of pedestrian movement causes further concerns in terms of the build-up of pedestrians on the footway, the availability of space and the implications of the surge of movement at the start of the pedestrian phase. Getting that surge of pedestrian movement to stop is difficult and has implications for the safe and efficient operation of the vehicular junction.
- On-site parking is marginally in excess of the current standards, but is considered to be acceptable.
- The use of additional parking provision at Arnhall Business Park is an arrangement that would not normally be permitted. There is uncertainty over long term retention of any such arrangement, and concern also that there may be potential for a great number of additional spaces to be secured at Arnhall through similar arrangements, undermining aims to promote sustainable travel.
- The applicants propose a Controlled Parking Zone in Westhill to remove parking on street, with residents entitled to permits at the applicants' expense. It is noted that Police Scotland would be responsible for the enforcement of any such scheme as parking has not been decriminalised in Aberdeenshire. Police Scotland have thus far committed to enforcement on a priority basis, which raises concerns given the potentially resource intensive nature of enforcement. Without adequate enforcement, a CPZ may prove to be ineffective in deterring on-street parking by supporters in Westhill. In the event the permission is to be granted, it will be necessary to use a condition to ensure that the CPZ can be delivered. This would need to be demonstrated prior to works commencing, with implementation prior to operation/use of the stadium. The applicant would be responsible for associated implementation costs and the provision of residents' permits.
- The eastern and western access arrangements are satisfactory in principle, subject to the usual Roads Construction Consent (RCC) procedures. There are concerns over the main access, principally in terms of road safety. It has been agreed that the principal access will be a permanent traffic signalised junction, operational at all times. The exact nature of signal timings and whether it is linked to neighbouring junctions should be established at a later date – this should be established by condition. The layout of the junction has yet to be finalised given the late agreement

for permanently operational signals; it may require four lanes westbound (two turning right into the development and two ahead towards Westhill) in order to operate safely. It may be possible to operate a three lane westbound approach with the central lane being marked as ahead and right. The east and west access should operate as left in left out priority junctions. Adequate segregation for buses and away support is made. Access arrangements of any description will likely place a burden on Police Scotland.

- The original TA presented an assessment that showed extensive queuing onto the AWPR from the A944 slip roads north and south for several hundred metres as well as indicating congestion and delay on the local road network. In order to resolve a number of issues, further calculations and analysis were carried out for the TAA. RDM raised a number of queries in respect to this. These centred on the use of the base data, which we acknowledge was used at the request of Transport Scotland, but which we know is flawed and appears to be the lowest prediction of post AWPR flow. With the reduction of parking on site to maximum standards, 250 vehicles were moved to the Dyce Park and Ride, and therefore out of the analysed network which we disagree with. The profiling was altered to extend arrivals over a longer period before a game reflecting the fanzone. The proposed signalisation of the AWPR/ A944 roundabout could remove any potential queue back onto the AWPR mainline, but to the detriment of the operation of the local road network.
- The internal road network is broadly acceptable, subject to the provision of stewards at pedestrian/vehicle conflict points during events.
- A framework Travel Plan has been submitted, and this is appropriate for this stage in the process. A Travel Plan condition would need to be applied, to ensure that satisfactory match-day travel arrangements would be in place, prior to the stadium becoming operational.
- In conclusion, should either the CPZ or pedestrian footbridge be undeliverable, this response should be treated as a formal objection as these are critical to the viability of the proposal. The deliverability of these elements must be demonstrated prior to works commencing, and they must subsequently be implemented prior to use of the stadium. The deliverability of pedestrian improvements to the east of the site also remains of concern.

**ACC - Flooding And Coastal Protection** – No objection to the proposal following submission of requested information relating to flood extents and provision of updated modelling work in line with most recent Flood Estimation Handbook (FEH 13). Queries relating to the effective use of porous paving within floodplain areas have also been resolved.

**ACC - Environmental Health** – Reviewed the application and associated Environmental Statement (ES) in relation to noise and air quality.

#### Noise

*Construction Noise and Vibration* – insufficient details available to assess noise and vibration. If approved, need to secure a noise and vibration management plan in accordance with BS5228-1:2009

*Operational* – ES identifies several operational noise sources that have varying magnitudes of impact on the surrounding noise sensitive receptors depending on the noise level, location and time of occurrence.

*Road Traffic Noise* – The greatest magnitude of impact is ‘major adverse’ impact at receptor 4 and ‘major adverse’ impact at receptor 2 and 3 during weekday evening matches during a 1 hour peak period. The ES indicates that noise mitigation is not feasible due to property location in relation to the roads. It is acknowledged that the level of impact occurring during weekday evening matches is likely to be infrequent.

*Noise egress from Stadium* – Main source from crowd and PA system noise, but this is sporadic and variable in nature. Major adverse impact identified to the nearest house (receptor 2) during an evening weekday match. Moderate adverse impact to same receptor from a Saturday afternoon match. Impacts will be limited to the number of matches held each year.

*Building Service Noise* – details of services not yet confirmed. All building services not to exceed Noise Rating curve 25 in the nearest dwellings (windows open).

*Noise from outwith stadium* – ‘Minor adverse’ impact to nearest receptor in evening. Fast food units have been identified as possible noise sources. To mitigate noise from such units it is advised that they are not located within 150 meters of the nearest residential property unless details of effective acoustic screening have first been agreed.

*Deliveries* – moderate adverse impact to properties to the south from deliveries. To minimise impact, it is recommended that deliveries are restricted to 7am-7pm, and that ‘large’ delivery vehicles use the SW access.

*Car parking Noise* – no noise identified.

*Training Pitches* – recommend that pitches closes to residential property are restricted so as to preclude use after 9pm.

#### Air Quality

Air quality in the area is currently good. Modelling was undertaken to predict the impact of the proposed development, based on opening in 2023 and taking account of the Aberdeen Western Peripheral Route and other committed developments. Scenarios for 2023 with and without the proposed stadium development were modelled. In both scenarios (with and without stadium proposal) nitrogen dioxide (NO<sub>2</sub>) and particulate (PM<sub>10</sub>) concentrations would remain well below national air quality objectives of 40ugm-3 and 18ugm-3 respectively. The impact of the development on annual mean NO<sub>2</sub> and PM<sub>10</sub> concentrations at all receptors was considered negligible.

Should permission be granted, it is recommended that traffic management conditions are used to reduce the impact of traffic associated with the development on air quality, for example through the use of the nearby park and ride, additional public and private bus services, measures to reduce car dependency and promote active travel.

There may be an impact arising from dust emissions during the construction phase. Should the proposals be granted it is recommended that a dust risk assessment and dust mitigation plan are provided, to be agreed with the Planning Authority, in consultation with Environmental Health colleagues, prior to the commencement of works.

#### Lighting

All external lighting to be installed shall be sufficiently screened and aligned so as to ensure that there is no direct illumination of neighbouring land and that light spillage beyond the boundaries of the site is minimised.

**ACC - Environmental Health (Contamination)** - No objection to approval of this application.

As the site has a history of use for landfilling, it is recommended that the following conditions are attached to any approval:

#### **Condition A**

*No development shall take place unless it is carried out in full accordance with a scheme to address any significant risks from contamination on the site that has been approved in writing by the planning authority.*

*The scheme shall follow the procedures outlined in “Planning Advice Note 33 Development of Contaminated Land” and shall be conducted by a suitably qualified person in accordance with best practice as detailed in “BS10175 Investigation of Potentially Contaminated Sites - Code of Practice” and other best practice guidance and shall include:*

- 1. an investigation to determine the nature and extent of contamination*

2. a site-specific risk assessment, including a gas risk assessment that considers both onsite and offsite receptors
3. a remediation plan to address any significant risks and ensure the site is fit for the use proposed
4. verification protocols to demonstrate compliance with the remediation plan
5. a site-specific working plan detailing protocols to control/mitigate risks that may arise as a result of the remedial activities

### Condition B

*The facility shall not be brought into use unless:*

1. *any long term monitoring and reporting that may be required by the approved scheme of contamination or remediation plan or that otherwise has been required in writing by the planning authority is being undertaken and*
  2. *a report has been submitted and approved in writing by the planning authority that verifies that the remedial works have been carried out in full accordance with the remediation plan,*
- unless the planning authority has given written consent for a variation.*

*- reason: to ensure that the site is suitable for use and fit for human occupation*

### ACC – Economic Development

Initial consultation response highlighted a lack of data and methodology to substantiate findings. Significantly, the net impact of the development was not considered to constitute a substantial growth or employment opportunity at an Aberdeen level, and the benefits to the Kingsford area were not considered compelling in terms of economic benefit. Whilst there are clear benefits from the construction phase of the project, net off-site benefits to the city would be marginal.

Further supporting information was provided, which raised queries relating to assumptions made about reduced attendances in the 'remain at Pittodrie' scenario; an uplift in the number of functions that is assumed at the proposed site; and other assumptions relating to city centre spending and population estimates.

Following further clarification from the applicants, ACC's Economic Development team made the following comments in relation to the applicants' assessment of economic benefit as follows:

- The likelihood of the loss of any European football from Pittodrie has not been presented.
- Any increased maintenance costs need to be set against the total running costs of remaining at Pittodrie. Similarly, the total running costs including the servicing of any debt at Kingsford need to be presented. This would allow the assertion that increased maintenance costs would reduce the playing budgets at Pittodrie to be reduced when compared with moving to Kingsford.
- If the likelihood of and the full economic impact of losing European football had been presented as well as the impact of maintenance costs on the total Pittodrie running costs then an assessment could be made of their impact on crowds at Pittodrie. However, the reduction to 8,500 at Pittodrie is not justified in detail. Similarly, without details of the total running costs of Kingsford, the assumption that crowds will remain at 13,476 cannot be appraised.
- Economic Development thus does not have a high degree of confidence in the accuracy of the crowd estimates at the two sites which underpin the net benefit calculations.
- Economic Development consider a city centre spend estimate only including those cars that park more than 20 minutes from Pittodrie as one end of a spectrum of estimates of the amount of revenue that fans and non-fans spend in the city centre from attending Pittodrie.
- A broader estimate would include the spend of all those who drive by car. Economic Development

thus requested an additional calculation of the city centre spend including all those who drive by car to Pittodrie as well as the example already provided.

- Using the EKOS analysis in table 5.8 if all the spend was of all those who drive by car to Pittodrie was included the city centre spend would be £1.78m. This gives a range of £0.51m to £1.78m of spend in the city centre from being at Pittodrie depending on the assumptions made of the spend of those who travel by car to Pittodrie.

**ACC - Waste Strategy Team** – Notes that this is a commercial development, where there are other commercial waster service contractors besides Aberdeen City Council. Advice is therefore general in nature, but highlights the following general needs:

- An area of hard standing at storage and collections point(s)
- Dropped kerb at proposed bin collection point
- Yellow lines in front of bin collection point
- Bin storage areas to ideally be provided with a gulley and wash down facility for the interest of hygiene

**ACC - City Centre Masterplan Team** – No response.

**Aberdeen City/Shire Developer Obligations Team** – Contributions may be required for implementing or linking to the Core Path Network.

If sufficient open space provision cannot be provided on site in line with policy requirements, then a contribution towards off site open space provision may be required under the Open Space Supplementary Guidance.

Any Strategic and Local Transportation requirements are identified and confirmed direct by Aberdeen City Council's Transportation Team.

**Aberdeen City Shire Strategic Development Planning Authority** – Restates earlier position that the development does not accord with the aims and objectives of the SDP.

- Highlights that the Development Plan applicable is up-to-date and notes the purpose of the SDP to focus the right development in the right places and to prevent inappropriate and poorly located development.
- The plan explicitly supports the principle of the development of “a new community stadium, a regionally important facility which will bring economic, social and cultural benefits” (para 3.24, Diagram – p13 and Schedule 2). Two possible locations are identified – on and around the current stadium site at Pittodrie / Kings Links and to the south of the city as part of the Loirston development.
- Improving and modernising the facilities of Aberdeen Football Club are supported by the SDP, as is the provision of community facilities.
- The application is clearly a high footfall generating use. The sequential approach to site selection and associated policy framework are therefore key to determination of the application.
- Attempts at justifying the necessity of co-locating the stadium, training pitches and academy are particularly weak, based on assertions rather than justification and based in some cases on information a decade old. No attempt has been made in the economic impact assessment to assess the impact of relocating the stadium away from a regeneration priority area as would be required in line with draft Scottish Government advice on assessing net economic benefit.

- Comparisons are made to green belt designations at Bellfield Farm and Loirston, however it should be clarified that Bellfield was approved under Structure Plan policy at that time which explicitly allowed an exception to the greenbelt policy (if there were to be a successful Scottish bid to co-host the Euro 2008 football tournament), while the Loirston site was approved in the context of an allocation in a proposed LDP as a material consideration. No equivalent policy provision or emerging allocation exists in this instance.
- Highlights that evidence of benefits to the club from co-location in no way justifies the need to have co-location but merely that it is preferable for the club. In light of this, the sequential test should be approached on the basis of separating the stadium from the training facilities. The applicant has not effectively discounted the availability of alternative and sequentially preferable sites if the different uses proposed were to be provided for separately. As a consequence it does not follow the sequential 'town centre first' approach of SPP or accord with the aims and objectives of the SDP.
- Scottish Planning Policy states that uses which generate significant levels of footfall should use a sequential test to demonstrate that sequentially preferable sites are not available. The necessity of a footbridge over the A944 to cope with the scale of fans seeking to cross the road is an indication of the footfall generated. No indication is given as to its potential visual impact on this important entrance to Westhill.
- Notes that the introduction of a new pedestrian bridge as mitigation for access issues further complicates the assessment process, as this has not been assessed in terms of its capacity, visual impact or deliverability as part of this application.
- The application is contrary to the Aberdeen City and Shire Strategic Development Plan. The proposal will result in the loss of 25Ha of greenbelt, the coalescence of urban areas (Westhill and Kingswells), is an inappropriately located development giving rise to unsustainable travel patterns (it has a very small catchment in terms of access by walking, cycling and public transport compared to other sequentially preferable sites) and is likely to have a negative impact on the City Centre.

**Aberdeen International Airport** – No objection to the proposal, having examined on the basis of aerodrome safeguarding criteria.

**Aberdeenshire Council** – Maintains its initial objection to the application on the grounds that *'the proposal in its current composition and location would be contrary to the Aberdeen City and Shire Strategic Development Plan (2014), which is up-to-date and relevant to this application. The proposal will result in the loss of greenbelt land, the coalescence of urban areas, inappropriately located development giving rise to unsustainable travel patterns and have a negative impact on the City Centre in terms of its mix of uses and lost revenue. The application is not in one of the two locations identified in the SDP and the applicant has not adequately justified why the stadium and training pitches etc. need to be co-located or why sequentially preferable sites have been dismissed as unsuitable.'*

In relation to the further information submitted, the following comments are added to supplement the initial objection:

- The statement submitted in relation to 'Co-location, Site Selection & Sequential Test' focuses on benefits of co-location, and the over-riding justification appears financial. The scale of unallocated site required for co-location is extensive and the justification put forward is not persuasive.
- The submitted Transportation Response; Travel Plan Framework; and Technical Note: Updated Shuttle Bus Strategy do not address the underlying reasons for Aberdeenshire Council's earlier objection.
- Specifically, the proposed Controlled Parking Zone (CPZ) lies wholly within Aberdeenshire, and its promotion would therefore require the creation of Traffic Regulation Orders (TROs) under the relevant Roads legislation in order to be legally enforceable. Those Orders can only be promoted

and implemented by Aberdeenshire Council and would require statutory consultation and committee approval. It is the view of Aberdeenshire Council that, should Aberdeen City Council be minded to grant planning permission, the identified impact must be mitigated through a legally enforceable CPZ that remains in perpetuity and is funded by the applicant. The arrangements for this would need to be demonstrated and considered acceptable by Aberdeenshire Council.

- The proposed footbridge over the A944 lies partly within Aberdeenshire and partly within Aberdeen City. Aberdeenshire Council has concerns about this element of the project, and highlights that such a structure would require planning permission in its own right and could not simply be conditioned. In the event that the City is minded to grant permission, this could only be possible if the bridge can be delivered. Aberdeenshire Council would have a role in determining any application, but has not had the opportunity to fully consider the acceptability of such a bridge in this location. The deliverability of both the CPZ and the pedestrian bridge is questioned, and the risk of significant adverse impacts to the Aberdeenshire transport network remains too great for the proposal to be accepted.
- Restates position that the economic impact on Aberdeenshire is likely to be fairly modest. Notes that there is no specific consideration of the impact on Westhill town centre, and highlights that negative impact due to loss of trade from customers avoiding or being unable to enjoy the existing level of convenience is an area of concern.

**Archaeology Service (Aberdeenshire Council) – No objection.**

Highlights earlier pre-application discussions with the appointed archaeological contractor. Notes that a review of Ground Investigations and known activity within the development site has established that significant soil moving and dumping has occurred across the site in the past (in places up to 7.2m in depth) and that this negates any requirement for archaeological evaluation, as reflected in the recommendations of the submitted Environmental Statement. On that basis, no further archaeological mitigation is required and no conditions relating to archaeology are recommended in this instance. This position was reaffirmed on 24.5.17, following re-consultation.

**BP Exploration Operating Company (North Sea Infrastructure) – No comment on the proposal.** Note that the safety and engineering integrity of the BP Forties Pipeline will not be affected. Highlights that any service routing should take account of the pipeline servitude. On subsequent re-consultation, position remained unchanged from that previously stated.

**Community Council: Kingswells– Object and recommend that the application be refused.** Initial response highlighted the following areas of concern:

- Breach of planning policy and creates a legal precedent for other future departures from the agreed SDP and ALDP
- Coalescence between Westhill and Kingswells
- Visual impact – stadium not suited to a semi-rural area
- Site selection process is flawed and does not adopt sequential approach or adequately consider alternatives
- Necessity of co-location has not been established
- Contrary to principles of City Centre Masterplan
- TA makes sweeping assumptions that favour the development, uses questionable sources and appears reliant



- Highlights that the majority of fans will drive if the opportunity exists and bus services are not sufficiently frequent or convenient
- Notes that AFC would be the main beneficiary of the development, with detrimental impact on the local communities involved.

Following the submission of additional information, Kingswells Community Council stated that there was nothing within these documents that altered the views expressed in the initial submission. The following further points were also raised:

- Conflict with the Development Plan was reiterated.
- Huge visual impact of the development within a semi-rural landscape, along with associated 'sky-glow' impact
- Disturbance arising from the Fanzone, particularly if audio-visual or live performances were held in this area. Lack of adequate mitigation proposals for any such noise disturbance. Noise impact may also arise from use of training facilities.
- Acknowledge that biodiversity impacts are likely to be small, with some benefits from planting proposals.
- Queries the assumptions made about the implications of remaining at Pittodrie, and notes lack of convincing evidence that co-location of training facilities is essential.
- Queries the applicants' statements that the city centre would not suffer economically and highlights the limited job-creation associated with the proposal.
- Queries the rationale for moving Community Trust facilities outwith Aberdeen.
- Queries the methodology used in the submitted Transport Assessment, which may have included development that is no longer proceeding.
- Highlights that the fan survey was based on travel to Pittodrie, rather than Kingsford, and that the Transport Assessment is based on 2.9 persons per vehicle, which seems to unrealistic and results in vehicles being understated.
- Concerns that streets within Kingswells, close to the Park and Ride site, would be affected by supporter parking.
- Remain unconvinced that an outdoor Fanzone will be effective in extending fans' arrival/departure times, particularly during bad weather and mid-week fixtures.
- Reiterate concerns about the number of pedestrians crossing the A944, and highlight the need for an overbridge or underpass to address this.
- States that AFC should be responsible for any costs associated with the modification of the A944, including pedestrian crossing points.

**Community Council: Cults, Bieldside And Milltimber**– Identifies potential impacts around Noise, Air Quality and Transportation during the construction phase, followed by Noise, Air Quality, Transportation and parking associated with the day to day use of the Stadium and its associated facilities thereafter. In addition there will be the impact of Match Days.

Air Quality - proposed mitigation measures are satisfactory providing they are strictly followed and monitored during the construction phase. Subsequent to construction heavy traffic at Match days could potentially affect air quality and we would recommend that an air monitoring station or stations are installed in appropriate positions to provide ongoing information.

Noise and Vibration – Agree that noise and vibration during construction will be minor adverse. Also agree

that noise levels during ongoing future operation of the Stadium will be major adverse particularly during match days and other activities in the Stadium. This will include crowd, PA noise and traffic noise, which will have a major impact at weekends. Traffic noise will we believe affect large areas of Westhill as drivers seek Parking places on residential streets. Feel that there is no satisfactory answer to this and if the Stadium Project is approved this will be a major source of complaint for future years.

Traffic - Agree that during Construction, if properly managed, the effects of traffic will not be excessive. Express concern however about traffic, transportation and access during future operation of the Stadium. Consider that the predicted traffic volumes are based on a road traffic survey carried out at the depth of the oil industry downturn, which is therefore not representative of the traffic that can be expected in future years around Westhill.

Traffic volumes will be high on match-days and parking for private vehicles will cause serious issues, particularly at weekends. Unless the police and Local Authorities strictly control it, the roads around Westhill will become heavily congested. Additional bus services will be required. High traffic volumes may also result in increased risk to pedestrians and cyclists.

Highlight the importance of a robust traffic management system, with key roles for both police and local authorities. A further option maybe to consider building another park and ride facility close to the stadium to serve it and Prime 4 & 5 projects.

Planning – Identifies conflicts with Policy NC5 Out of Centre Proposals in relation to accessibility via sustainable transport and adverse impact on travel patterns and air pollution.

Notes the limited information available within the submitted ES in terms of transport strategy, specifically in relation to the delivery of public transport services sufficient to meet match day requirements. Potential conflict with Policy T2 Managing the Transport Impact of Development.

Policy NE2 Green Belt – Green space will be lost to the development so an exception to this policy would be required. If the proposed development were limited to the establishment of training pitches and associated facilities, with the existing stadium at Pittodrie being retained and redeveloped, then there would be less concern over loss of Green Belt. A redevelopment at Pittodrie would probably remove many of the concerns raised by Westhill residents and provide a better solution for all.

A second response following the submission of additional information raised the following further points:

No objection to the construction of a new stadium in principle. Note proposed traffic management proposals and suggest conditions relating to the following matters:

1. Seating design – all the terraced seating in the stadium should have a C value of at least 120 mm. It seems completely illogical to design a brand new stadium with sub-optimal viewing (optimal viewing standard 120mm) for what looks like nearly half the total number of spectators. If Aberdeen Football Club (AFC) is going to be allowed to build the stadium, make sure they do it to a standard that reflects well on the city.

2. Spectator Transport – any planning permission granted should include the condition that requires AFC to demonstrate that bus transport contracts which are capable of transporting spectators as set out in the Transport Assessment Addendum May 2017 are in place before the stadium can be used for matches. The suitability of the bus arrangements should be monitored at regular intervals.

3. Traffic Management - any planning permission granted should include the condition that AFC fund any required traffic management measures, either new traffic signals at junctions or police support at key junctions on match days, to minimise traffic queues and waiting times. The traffic assessment suggests the potential queues and waiting times at some junctions would be excessive and unacceptable without traffic management.

4. Bus Lanes – the traffic assessment makes it clear that the creation of bus lanes will severely impact traffic movement and bus lanes should not be introduced on the roads around the new stadium.

**Community Council: Westhill and Elrick –** Do not believe that the proposed site at Kingsford is suitable.

Main concerns include loss of green belt land; impact of high car numbers on local infrastructure including both the A944 and roads and streets within Westhill, the lack of adequate community facilities within the proposal, and the economic impact on both Westhill and the City Centre

Overall, WECC believe that:

- Green belt land should be protected, and therefore not built upon under any circumstances. The proposed site currently protects the boundary of Westhill, ensuring no coalescence of Westhill and Kingswells.
- Any building on this site would encourage further ribbon development along the A944, setting a dangerous precedent for the future.
- Any building on this site may increase the risk of flooding to nearby residential properties.
- Nearby properties would also be hugely affected by both noise and light.
- Alternative sites have not been suitably considered, and do not see any reason why the stadium and training facilities must be co-located.
- This site is not appropriate for this development.
- The Transport Assessment for this planning application is highly inadequate.
- The large increase in traffic that this development would bring would lead to extreme congestion both on the already busy A944 and the AWPR.
- Access for emergency service vehicles is extremely unclear.
- Parking is another huge concern, with insufficient guaranteed spaces provided.
- The proposed addition of off-site spaces leads to further concerns over sustainability and pedestrian safety.
- This proposal is contrary to the National Transport Strategy, and would rely heavily on car usage rather than sustainable transport.
- The impact of such high levels of traffic on the surrounding inadequate infrastructure causes WECC great concerns, especially regarding congestion.
- Overall, WECC believe that:
- The detail of this application shows limited facilities for community use, and a lack of facilities for anything other than football.
- There are major concerns regarding accessibility and affordability of the proposed facilities for community use.
- The AFCCT have done a lot of good work throughout Aberdeen City and Shire, however could be located anywhere, and may benefit from being in a more accessible location nearer the city centre.
- Whilst this proposal could create jobs in the construction phase, but the long term net gain of 30 part time or seasonal jobs is extremely disappointing.
- The detrimental impact that this development would have both on our local businesses in Westhill and many city centre businesses is highly concerning, and goes against the City Centre Master Plan.
- On the general economic impact, WECC hope that these facts will be taken into consideration when a decision is reached regarding this application.

In response to additional information, the Community Council added the following comments:

*Car parking as a whole is a huge concern to WECC, especially as the proposed off-site car parking has still not been guaranteed. The survey of fans quoted in the additional information states that 90% of those who drive to the stadium will park within a 20 minute walk. These issues create an even greater danger that streets and public car parking in Westhill and Kingswells will be used by large numbers of fans attending the stadium on match days, creating further concerns for both communities. No matter what public transport is available to fans, there will always be a high percentage who choose to use private cars for their own convenience.*

*In the survey by Aberdeen & Grampian Chamber of Commerce (A&GCC), it was stated that 61% declared*

*their preferred method of transport was by car, confirming what we had suspected. We do not agree with encouraging the use of the nearby park and ride facilities for private car parking, as this disadvantages other members of the public who are not attending the matches. Whilst this stadium would be located close to the AWPR, this new road is not designed to facilitate development, but rather to alleviate the already congested roads around Aberdeen. Even high numbers of buses would add a large volume of traffic to these roads, which would be detrimental to Westhill, Elrick and other communities further West. We also wish to note concern raised by some of our Community Council members regarding the 'independence' of the survey carried out by A&GCC due to the close working relationships between Aberdeen Football Club, the Community Trust & Aberdeen & Grampian Chamber of Commerce.*

*Westhill & Elrick Community Council do not agree with the claim that this development would be beneficial for our local community on a socio-economic level. These claims are greatly exaggerated. Whilst we appreciate the great work done by the Community Trust, we do not believe the assertions that our local community will benefit in a significant way. In our previous objection, we noted our disappointment with the low number of part-time or seasonal jobs which would be created after the completion of this development. In addition to this, the owners of our local shopping centre previously submitted an objection to this application due to their concerns of the impact on our local retailers and businesses. The creation of a Fanzone within the development only adds to these concerns, as fans would be encouraged to spend their time and money within the site, and therefore would be of no economic benefit to our local businesses. On a social level, there would be huge disruption to our community every match day, especially as a match day capacity crowd would be significantly larger than the population of Westhill & Elrick. This could be even more so with special events such as concerts or other events with large attendance.*

**Dee District Salmon Fishery Board (DDSFB) –** No objection. Offers the following advice:

Initial consultation highlighted the absence of a survey relating to fish species and density as part of the EIA. This was identified as being necessary to allow assessment of likely impacts. Upon being re-consulted in relation to additional information, the DDSFB notes that, since installation of a fish pass in 2014, salmon have established a juvenile population along 13km of the upstream tributaries of the Culter Burn, therefore such upstream areas shall be treated as if part of the SAC. A preliminary assessment of the Brodiach Burn found no spawning habitat and little quality habitat to support salmonoids. Suitable habitat for juvenile lamprey was observed. The DDSFB suspects that the Brodiach Burn may have brown trout, lamprey and possibly eel, however this would require an electric fishing survey to confirm. DDSFB agrees with the fish survey's assessment that the watercourses are not high quality habitats, but stresses that any pollution (such as excessive sediment input from the development) may impact not only the small number of fish in the immediate area but also could damage species and habitats downstream. On that basis, effective sediment and pollution control measures are essential. No adverse impact on the water quality of the River Dee SAC should be permitted. Notes past failures in mitigation measures intended to prevent sediment pollution issues, and would welcome opportunity to work with the planning authority in ensuring that any potential impacts are effectively managed and mitigated.

**Health And Safety Executive –** No objection, on safety grounds, against the granting of permission.

Note the presence of two major accident hazard pipelines: the BP Forties Cruden Bay Terminal/Kinneil Terminal pipeline and the Shell Expro St Fergus to Mossmorran NGL Pipeline. The stadium itself is outwith the consultation distance of both pipelines. Other elements of the proposal lie wholly or partly within the consultation distance, as follows: training facilities; pitches for academy and community facilities; shuttle bus facilities; outside broadcast area; coach and car park areas; and access roads.

Of these, the only element that gave rise to any concern from HSE relates to queuing arrangements for shuttle buses serving Aberdeen City Centre and the various P&R sites. Following discussion between HSE and the applicants' consultant, these concerns have been addressed and the revised site layout plan shows that the area for pedestrian access to these buses will not extend within the middle zone of the Shell pipeline.

**Historic Environment Scotland (HES)** – No objection. HES considers that the proposals do not raise historic environment issues of national significance. Highlights that this should not be taken as an expression of support, and that the application should be determined in accordance with national and local policy on development affecting the historic environment. On re-consultation on additional information, HES reiterated that position without further comment.

**Police Scotland** – No objection to the proposal, but offer detailed advice on measures to prevent crime through careful design and ongoing management, including the following key areas.

- the general layout of the site appears generally to be good from a Crime Prevention Through Environmental Design (CEPTED) perspective
- A clear boundary between public and private space would be effective in deterring or preventing intrusion. Boundary treatments should be well defined and fencing is clearly a consideration for these developments.
- Recommend the use of different road surface treatments within the development which can act as psychological boundaries between different areas, as well as being used as traffic calming measures.
- Recommend that access to designated parking areas for staff, visitors and business-related vehicles should be restricted.
- Footpaths should, as far as possible, be straight, wide and well-lit which will promote the feeling of personal safety whilst discouraging anti-social behaviour. Likewise, signage directing pedestrians and vehicles should be clear and uncluttered thereby directing them via the most appropriate route and assisting in prohibiting unauthorised persons from entering private or non-public areas.
- Planting/landscaping should not impede the opportunity for natural surveillance.
- Location and design of seating areas should be carefully considered to avoid promoting congregating in inappropriate areas – e.g. car parks.
- Recommend use of CCTV system, with coverage focused on seating areas, congregation points, parking areas and access points. Such a system should be designed in conjunction with lighting proposals for the site, which should provide uniform spread of white lighting and avoid dark spots to deter crime and anti-social behaviour.
- The external façade of buildings should avoid creating hiding places or aids to climbing.
- Storage for cycles and motorcycles should be either within a secured area or positioned so that they are in full view and subject to natural surveillance and passing foot traffic.
- Operational policing of football matches or events should be considered and the applicants are encouraged to involve Police Scotland to develop an appropriate model.
- Crime reduction/prevention measures during the construction phase should be considered by the applicants.
- The applicants are encouraged to attain the 'Secured By Design' award.

**Royal Society For The Protection Of Birds Scotland** – No objection to this proposal, providing that the breeding bird surveys were carried out in accordance with the relevant guidance.

Submitted breeding bird report does not contain information on timings of surveys and weather

encountered. It was assumed that standard methodology was followed and, provided that was the case, the RSPB is satisfied that the proposed site is not of significant importance to breeding or wintering bird populations. Retain concerns regarding the use of green belt land, but recognise the efforts made to enhance biodiversity and blending the development into the landscape. The provision of various nest boxes would be welcomed by a variety of species, including bats, starlings, swifts and kestrels, as well as smaller woodland birds.

The species composition of the wildflower meadow should be chosen carefully to thrive under any anticipated shade of the trees and hedges, which are to be planted along the southern edge of the development. We also suggest that the area of wild flowers could be increased significantly by creating “flowering lawns”, in place of a monoculture of separate amenity grassland. Such low-growing plants can be mown when required, and would be attractive to wildlife and human visitors alike.

**Scottish Environment Protection Agency** – Recommend that conditions are attached to any grant of planning permission as follows:

- condition requiring no land raising of any part of the car park area above the levels identified in plan 111644/2002 Rev B.
- Welcome the proposal to connect to public foul drainage and to avoid any doubt, ask that this be ensured by suitable condition.
- Note that under CAR we cannot control quantity of discharge of surface water and hence you will need to consider conditioning this aspect
- we note that the proposals are described as “conceptual” and as a result you may wish to apply a condition to ensure that the design of any final detail is acceptable to you
- We are generally content with the construction pollution prevention and environmental management principles outlined in the submission. We ask that a condition is applied requiring all works to be carried out in line with the submitted Schedule of Mitigation (Chapter 14 of the ES).
- condition to ensure Construction Environmental Management Plan (CEMP) submission for each phase of the development. For the avoidance of doubt this should cover elements such as construction SUDS and any waterbody engineering works which do not relate directly to making the site fit for its proposed use (as those relating directly to making the site fit for its proposed use will be directly controlled by us via the waste management licence).
- condition requiring the submission of a finalised Energy Strategy which demonstrate how the development complies with Policy R7 of the Local Development Plan, the related Supplementary Guidance and the Online Scottish Government “Planning and Heat” guidance (2015). If the planning authority considers it reasonable to do so they could request this submission prior to determination as it could affect layout.
- We are supportive of the 12 m wide buffer which is proposed to protect the water features and the related provisional planting proposals. We ask that a condition is applied requiring full details of the finalised riparian habitat proposals to be agreed with the planning authority in consultation with SEPA. The submission should include clear plans and details for morphological improvements (i.e. measures to restore the watercourse to a more natural form), riparian planting (including of wetlands) and management proposals (including for, for example, control of non-native invasive species). This requirement will help compensate for the loss of the man-made pond and MG9 and MG10 wetland habitats on the site.

Should the planning authority be minded to grant permission without any of these conditions, SEPA's comments should be treated as an objection.

**Scottish Fire And Rescue Service** – No response.

**Scottish Natural Heritage** – No objection. Make the following comments:

- Note that the proposal could affect the River Dee SAC designated for its freshwater pearl mussels, Atlantic salmon and otter. The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, Aberdeen City Council is required to consider the effect of the proposal on the SAC before it can be consented (commonly known as Habitats Regulations Appraisal).
- Given the undertaking within the ES to install a construction phase SuDS, our view is that this proposal is unlikely to have a significant effect on either freshwater pearl mussels or salmon. The absence of signs of otter during the initial species walkover survey suggests that it is also unlikely that the proposal will have a significant effect on this species.
- Note the results of the wintering bird survey. Agree with conclusions and recommendations set out in the survey report. The proposal is unlikely to have a significant effect on wintering populations of greylag geese and no further consideration in relation to the SPA is required.
- Note the results of the breeding bird survey. Standard breeding bird survey guidance indicates that the second of the two visits should be carried out between mid-May and late June, and at least 4 weeks after the initial visit. In this case the second visit was carried out on 12 May and three and half weeks after the initial visit. In addition, no details are given in the survey report as to weather conditions or the times of day at which the survey was carried out. You may wish to clarify with the applicant that survey visits were carried out in appropriate weather conditions and at the optimum time of day, in order to increase confidence in the surveys conclusions.
- Note conclusions of the invertebrate survey report. We are not aware of any particular sensitivities associated with the site.
- The reptile survey was carried out between early and mid-May. While this is within the 'active period' for reptiles, we note that weather conditions during survey visits, particularly temperature, were marginal in terms of being suitable to find reptiles. However, provided the approach outlined in the ES to dismantle possible refuges 'by hand where possible or slowly by machine' then adverse impacts on reptiles are likely to be minimal. As set out in our earlier letter, we advise that where possible refuges are to be dismantled 'slowly by machine' this should be done in the presence of an observer who is in a position to see any reptiles exposed by the work.
- Suitably designed SUDS will ensure the protection of the River Dee Special Area of Conservation (SAC). We do not wish to comment on the proposed SUDS; we are content that the Council satisfy itself that it is adequate, with advice from SEPA, if required. SUDS features can contribute to the biodiversity interest of a site. We therefore recommend, for example, the use of native species in swales.

**Scottish Water** – No objection to the application. Notes that there is currently capacity in the Invercarnie Water Treatment Works to service the proposed development, however there may be insufficient capacity in the Nigg PFI Waste Water Treatment Works to service the development. Highlights that capacity cannot be reserved prior to planning permission being granted.

**Sport Scotland** – No comments to make on the proposal, on the basis that there are no existing uses on the site in respect of which Sport Scotland is a statutory consultee.

**Shell UK Exploration And Production** – No objection.



Note that development is outside the Shell pipeline servitude, and will have no impact on the pipeline. Note that construction works and any service routing should take account of the Shell pipeline. That position is restated in later response.

**Transport Scotland** – Recommends that any permission granted by the planning authority is subject to the following conditions:

1. (a) The proposed development shall not become operational until a Travel Plan / Transport Management Strategy, which addresses inter alia, access by walking and cycling, public transport provision, car parking management and traffic management, has been submitted to and approved in writing by the Planning Authority, following consultation with Transport Scotland and Police Scotland.

The Transport Management Strategy shall incorporate a monitoring and review process to be undertaken for each match day / event held at the Stadium. Where this review process identifies issues with the existing Transport Management Strategy, the applicant shall submit proposals to address these issues to the Planning Authority who, in consultation with the relevant Roads Authorities (Transport Scotland, Aberdeen City Council and Aberdeenshire Council) and Police Scotland, shall approve amendments to the Transport Management Strategy for subsequent events.

(b) Specifically, with regards to the trunk road network, the Transport Management Strategy shall identify the procedures for managing queues before and after matches on the A90 slip roads at the AWPR / A944 Kingswells South Junction, for example, through traffic signal control or manual control by Police Scotland. Where permanent traffic signal control is proposed, the layout design and specification shall all be approved in writing by the Planning Authority, following consultation with Transport Scotland and Police Scotland, and thereafter installed to the agreed plans prior to the development becoming operational.

Reason: To minimise interference with the safety and free flow of traffic on the trunk road network.

2. No part of the development shall become operational until details of match day advanced directional and warning signage have been submitted to, and approved by, the Planning Authority, following consultation with Transport Scotland, and thereafter erected in accordance with the agreed plans.

Reason: To minimise interference with the safety and free flow of traffic on the trunk road network.

## REPRESENTATIONS

A total of 10,147 valid and timeously made representations have been received in relation to this application. Of these representations, 5,330 (53.5%) are in support of the proposal, 4,797 (47.3%) state objection, and 20 (less than 0.2%) are neutral in content.

Representations in support include those from:

- *Stewart Regan, Chief Executive SFA*
- *Alan McRae, President SFA*
- *Neil Doncaster, Chief Executive SPFL*
- *Colin Parker, Chair of Scottish Council for Development and Industry, North-East Committee*
- *Gary Atkinson, Aberdeen City and Shire Hotels Association*
- *Duncan Skinner, Chair of the Board of Trustees, Aberdeen FC Community Trust*
- *Russell Borthwick, Chief Executive, Aberdeen & Grampian Chamber of Commerce*
- *Prof. Ferdinand von Prondzynski, Principal and Vice-Chancellor, Robert Gordon University*
- *Mr Graeme Mackay, Club Secretary, Inverness Reds Aberdeen FC Supporters Club*

- *Sir Ian Wood GBE, Chairman, Opportunity North East (ONE)*

Objections to the proposal include submissions from:

- *Katherine Sneedeen, Jigsaw planning on behalf of No Kingsford Stadium (NKS) community group*
- *Chris Finnen, Group Scout Leader on behalf of Trustees, 1<sup>st</sup> Westhill Scout Group*
- *Colin Howden, director, Transform Scotland (campaign for sustainable transport)*

The matters raised in representations can be categorised into a series of general topics and summarised as follows.

### **National, Regional and Local planning policy**

- *Contrary to Scottish Planning Policy (SPP);*
- *Contrary to the Strategic Development Plan (SDP) – it would be contrary to the sustainable development and quality of environment objectives/ policies;*
- *Contrary to the majority of policies contained within the current Aberdeen Local Development Plan (LDP);*
- *The site is not allocated for development, represents a significant departure from the LDP and is contrary to greenbelt policy by failing to meet any of the requirements identified therein;*
- *The refusal of two previous planning applications (golf driving range and housing development) adjacent to the application site has set a precedent;*
- *The loss of farmland;*
- *The proposal is contrary to the ‘town centre first principle’ in National Planning Framework 3 (NPF3) and SPP;*
- *An out-of-town ‘significant footfall generating development’ is contrary to the aims of the City Centre Masterplan to regenerate Aberdeen city centre;*
- *The site will unlikely remain as green belt in the future;*
- *The site is not green belt but ‘brownfield’, and should be re-classified as such;*
- *The unique nature of the proposal is such that it would not set a precedent;*
- *The Council has shown with previous planning applications that they can make the case to “be flexible”, where they deem it necessary;*

### **Co-location, site selection and sequential test**

- *The applicant has concentrated on co-location of a stadium with training facilities, making the search for a 25 hectare site their goal, rather than two separate sites;*
- *A compelling case for the co-location of a stadium and training facilities has not been made;*
- *Kingsford is “the wrong location” for a new stadium. The site selection report shows no clear reason why Kingsford is the preferred site;*
- *The site been chosen for financial reasons only, it is about making money for developers;*
- *Very few people in the local area want the stadium;*
- *The adopted, and up to date local plan identifies Loirston for a community stadium;*
- *There is no legal difficulty in using Common Good land at King’s Links;*
- *Co-location of training facilities, youth academy, community facilities and stadium is essential to the Club’s future on and off the pitch;*
- *Nowhere in the city centre is large enough to accommodate a stadium;*
- *The need for co-location is a matter for AFC alone and should not be scrutinised by the Council;*

### **The Environmental Statement (ES) and environmental impacts**

- *Deficiencies in the ES – it is not comprehensive, it is inaccurate and misleading;*
- *Significant impacts to local wildlife and protected species – loss of wildlife habitat through reduction in biodiversity;*
- *Impact on the flight path of geese;*

- *The proposal would cause light pollution;*
- *Negative impact on air quality;*
- *Impact on the Local Nature Reserve;*
- *Impact on water courses & water quality;*
- *Impact on the flora & fauna within Denman Park;*
- *The surface water drainage proposals are unrealistic;*
- *The foul drainage proposals are unclear, there appear to be different proposals for this within the Drainage Assessment and Environmental Statement;*
- *The ES is comprehensive and proposes suitable mitigation to deal with any adverse impacts;*

## **Transport, accessibility and sustainability**

- *Unsustainable location – car reliant development;*
- *Local transport links are inadequate (bus, walking, cycling and rail) and thus will be inaccessible for many supporters;*
- *The proposed development is contrary to the Aberdeen City Council Local Transport Strategy and the NESTRAN's Transport Strategy;*
- *Major traffic holdups on the A944 as a result of queuing traffic waiting to enter/ exit the development site;*
- *Potential for significant tailbacks at the AWPR junction, its slip roads and carriageway at peak times;*
- *The purpose of the AWPR is to alleviate traffic congestion in the City Centre, not to facilitate further development;*
- *Concerns regarding the TA – it may not be accurate, it takes no account of the effect of committed future significant developments in the vicinity;*
- *The impact on road safety and public safety due to additional traffic;*
- *The developer should have to pay for all infrastructure / road improvement costs;*
- *There are not enough local buses to cater for the proposed transport strategy;*
- *Additional vehicular journeys to the site would cause greenhouse gas emissions;*
- *During match times access for emergency vehicles will be impeded;*
- *The suggested modal shift away from the car is unrealistic;*
- *Insufficient on-site car parking;*
- *There will be significant overspill car parking into adjacent residential areas;*
- *Parking restrictions should not be imposed on residents;*
- *The implementation/ management of a future Controlled Parking Zone (CPZ) has not been adequately addressed/ explained;*
- *No guarantees from Police Scotland that indiscriminate parking would be adequately policed;*
- *No practical and manageable transport strategy that could cope with the number of fans attending games given the site geography and possible traffic flows;*
- *There are already 13 sets of traffic lights between the Kingsford and Anderson Drive;*
- *Thousands of vehicles would require parking spaces out with the stadium, resulting in indiscriminate parking within shopping centre car parks and residential streets;*
- *Residential property would be inaccessible from the A944 due to increased traffic associated with the development;*
- *Westhill would be "gridlocked";*
- *Additional traffic will cause further disintegration of road surface and potholes;*
- *Reduced accessibility as Park and Ride buses to Kingswells/ Aberdeen are going to be stopped;*
- *Overspill parking within Arnhall would restrict the number of spaces available to employees;*
- *Limited number of bus stops along the A944;*
- *Amenities afforded by the Core Paths network in the area would be negatively affected;*
- *The proposed shuttle bus system will not be the first choice for most travelling fans;*
- *No transport strategy for "other events" has been provided;*
- *Concern about access to Hazelhead Crematorium during match days;*
- *The new AWPR will provide excellent accessibility for both home and away fans coming from areas to the North, South and West;*
- *Proposed stadium will remove congestion from city centre on match days;*

- *Traffic matters would prevail no matter where the development is located;*
- *Impacts would be limited to match days to match days/ events “a handful” of events throughout the year;*
- *The submitted TA and TAA fails to comply with planning policy; does not demonstrate a sustainable and accessible development; underestimates the traffic generation through the applied methodology; breaches maximum parking standards and is confusing, contradictory and lacking in detail*
- *Corporate and hospitality figures are “vague”*
- *Arrangements surrounding parking provision at Arnhall have not been adequately detailed or explained, including pre-match drop-offs*
- *No direct or related away-support coach data is present within the TA model*
- *The TA takes no account of weather patterns and how these may impact on traffic*
- *The Prime Four “retail complex” application has not been properly considered within the TA*
- *It is unclear why a figure of ‘3 persons per car’ has been used*
- *Network disruption during both planned construction phases*
- *The submitted TAA presents a travel pattern for supporters which places an over reliance on early arrival and use of buses at capacity or greater*
- *The Aberdeen and Grampian Chamber of Commerce (AGCC) Supporter Survey was not independent*

## **Residential amenity**

- *Loss of a tranquil area;*
- *Noise generated from the stadium and ancillary activities before, during and after matches/ events would be heard across the wider area – insufficient evidence that noise generated from the development could be sufficiently mitigated;*
- *Light pollution emanating from the stadium and training pitches;*
- *Antisocial behaviour and increased crime within nearby residential areas before and after matches;*
- *Westhill town centre will become a “no-go” during match day for residents;*
- *Loss of a view and outlook from residential properties;*
- *Other events such as concerts will probably be given permission in future causing additional “mayhem” to residential property;*
- *The current studies do not take into account the impact of the AWPR on the community of Kingswells or Westhill;*
- *The applicant has introduced an outdoor ‘Fanzone’ within which noise generating activities would be held – no assessment to establish the impact on surrounding property has been carried out i.e. noise assessment;*
- *Litter;*
- *The stadium would be suitably distant from adjacent residential buildings;*

## **Design, size and scale**

- *Over development of the site;*
- *The stadium is a “carbuncle”, a “blot on the landscape”;*
- *The size and height of the development;*
- *The bright colour of the façade;*
- *Overbearing and incongruous development;*
- *Red cladding would be “garish” and is ill-suited to a rural landscape setting;*
- *At the Pre-Application Forum, assurances were given by AFC representatives that the proposed stadium would not be “lit up red”;*
- *The proposed stadium would cast a “big shadow” over Westhill;*
- *No effort made to make the development sympathetic to its surroundings;*

- *A 20,000 seat stadium is too small – a larger stadium would provide the City and North East with a facility to host major events;*
- *A red clad stadium of the size and scale proposed would dramatically affect landscape character and would be a “blot on the landscape”;*
- *The development will lead to the coalescence of the Kingswells and Westhill settlements;*
- *The proposed landscaping scheme would not provide adequate screening of the development;*
- *The design of the stadium is in keeping with nearby commercial developments;*
- *The training facilities are complementary to, and wholly compatible with a green belt setting;*
- *The proposal is an individual development that will integrate into the wide open landscape;*

### **Economic and social benefits/ impacts**

- *There would be little or no benefit to the local economy through job creation, as there are no plans to significantly increase AFC staffing numbers;*
- *Proposal is contrary to City Centre Masterplan because it would remove a large amount of expenditure within the city;*
- *Undesirable shopping/ retail environment will restrict shoppers and impact on local businesses;*
- *Loss of city centre spend and negative impact on local business adjacent to Pittodrie;*
- *Few jobs would be created - likely part-time/ minimum wage/ zero hour contracts which are of little economic benefit to a community;*
- *City centre businesses, pubs and restaurants would suffer as a result;*
- *The development would be located in an area where there is little/ no social deprivation – disadvantaging communities that need it most;*
- *The social aspects of a stadium in City Centre will be lost;*
- *The creation of suitable community facilities is vital to extend the reach of the charity (AFCCT);*
- *AFC generates money for the city as well as goodwill and feel-good factor;*
- *This facility will provide extensive business and social benefit to the City and Shire, with additional off-shoot economic benefits to the local area through employment during and following construction;*
- *The development will bring confidence to region at the current economic challenging times and will enhance the region's position as a sporting centre of excellence;*
- *Approval of the application will send a clear message that Aberdeen is “open for business”;*
- *The development represents a much-needed boost for the City in the recent downturn in the region;*
- *The proposal would result in an enhancement of facilities in NE Scotland and increase access for children and young adults to adequate football training facilities;*
- *The proposal would be more economically efficient & environmentally friendly than Pittodrie;*
- *Good for the local and regional economy in terms of job creation and revenue;*
- *Increase in programs that centre around positive activity, health & wellbeing, equality & inclusion, good citizenship and learning;*
- *Knock on benefits for the retail, leisure, hotel and hospitality sectors;*
- *Numerous opportunities for sport and will attract other events into area;*
- *A much-needed source of investment for the whole region;*
- *Would result in a significant increase in footfall within the surrounding area;*

### **Safety matters**

- *The location of the development between BP Forties Oil Pipeline and the Shell Condensate pipeline represents a significant safety issue in respect of potential incidents (accidental or intentional i.e. terrorism) – T in the Park was re-located due to similar issues;*
- *The combined pavement and cycle path (Core Path 91) would be unable to cope with “potentially thousands” of supporters and conflict with existing Core Path users, resulting in safety issues associated with fast moving vehicular traffic;*
- *Safety concerns of the number of fans walking on/around a busy dual carriageway before and after the match;*
- *Lack of access/ egress points to and from stadium presents serious threat to public safety;*

- Concerns about the capability of Police Scotland to sufficiently deploy enough officers for matches/ events at the stadium;
- Safety of children on matchdays;
- Stadium built on a previous landfill site is a concern for safety for the public;
- Doctors and nurses who live in Westhill would be held up on a congested network;
- There is no existing CCTV within Westhill – a secure CCTV system would require to be extended at a substantial cost. The application provides no information on this, or who would bear the cost;
- The lack of local amenities would mean that fans would be inclined to travel straight to the site and straight home following an event, alleviating potential nuisance;

#### Other matters

- The pre-application consultation was inadequate;
- ACC should address ‘false and fraudulent’ representations in support of the application;
- The project will go ahead no matter what objections are raised as “the decision has already been made”;
- Application is being considered by Aberdeen City Council yet major impact will be on residents of in Westhill;
- The success of AFC results in a “feel good factor” to the City and region;
- Many of the objections are based on “fear of the unknown”, rather than on a factual and objective basis;
- Many people that disagree with the building of the stadium are fans of other clubs and non-football fans, which should not be taken in to consideration;
- Those submitting support to the application are doing so on the basis of being football supporters;
- The term “community stadium” is misleading – it will not be a community facility, but a commercial enterprise for AFC;
- Adjacent commercial units have been built within the area with little local resistance;
- Westhill is not part of the city as it is in Aberdeenshire, and has no right to interfere with Aberdeen City planning decisions;
- Increase in house prices;
- Development will increase localised flooding within and around the site;
- The stadium should be located within Aberdeen and not Aberdeenshire;
- Little or no public facilities within Westhill to cope with hundreds of fans;
- Archaeological sites like the Long Cairn and the Quakers Graveyard will be affected;
- Impact on water resources for the area to facilitate aspects of the development;
- Doubts that local clubs would be able to book and use the pitch in the stadium;
- The facilities would be limited to football only, precluding all other sports;
- A new Stadium will severely undermine the historical identity, foundations and fabric of AFC;
- The local Council should therefore be looking to maintain, promote, redevelop and harness this historical identity of Pittodrie;
- The development should not be allowed to proceed until AFC can evidence that they have a financial resources to deliver such a “mammoth” concept;
- The city of Aberdeen should not be giving public money/ funding to a stadium;
- Reduction in attendances as a result of proposed location/ proximity from city centre;
- If Heart of Midlothian can redevelop their stadium, why can AFC redevelop Pittodrie?;
- The club has manufactured a justification for relocation by deliberately withholding routine maintenance expenditure on existing stadium;
- AFC is integral to the identity and reputation of the city;
- Without the development, AFC would cease to exist;
- New housing is badly needed in the centre of Aberdeen and the stadium move will open up a new area for development which will help boost the city;

#### MATERIAL CONSIDERATIONS

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## Legislative Requirements

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where, in making any determination under the planning acts, regard is to be had to the provisions of the Development Plan and that determination shall be made in accordance with the plan, so far as material to the application unless material considerations indicate otherwise.

## National Planning Policy and Guidance

### National Planning Framework 3 (NPF3)

NPF3 is a long-term strategy for the development of Scotland - the spatial expression of the Scottish Government's Economic Strategy, with a focus on supporting sustainable economic growth and the transition to a low-carbon economy. A series of national developments is identified across Scotland to deliver the strategy. NPF3's section on Aberdeen and the North East states that the city centre will be a focus for regeneration efforts.

NPF3 also highlights that city centres are key assets for attracting investment and providing services. Quality of place is fundamental to the success of Scotland's cities, in particular city centres. The Scottish Government wishes to see ambitious, up-to-date frameworks for city centre development. These should focus on the quality, sustainability and resilience of the built environment and wider public realm, and on improving accessibility by public and sustainable transport modes, such as cycling. An aspiration of NPF3 is for more sustainable cities, which utilise greater population density and shared infrastructure as well as fostering better connections between our cities. The scheduled opening of the Aberdeen Western Peripheral Route (AWPR) is anticipated to significantly improve transport in and around Aberdeen, and the strategic location of park and ride facilities is highlighted as having an important role in providing public transport access to Scotland's city centres.

Reducing the impact of the car on city and town centres is seen as make a significant contribution to realising their potential as sustainable places to live and invest by addressing congestion, air pollution and noise and improving the public realm. Significant health benefits could be achieved by substantially increasing active travel within our most densely populated areas.

### Scottish Planning Policy (SPP - 2014)

Scottish Ministers, through SPP, expect the planning system, amongst other things, to focus on outcomes, maximising benefits and balancing competing interests; play a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities; and be plan-led, with plans being up-to-date and relevant.

SPP's identified outcomes include achieving 1. *'A successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places'*; 2. *'A low carbon place – reducing our carbon emissions and adapting to climate change'*; and 3. *'A natural, resilient place – helping to protect and enhance our natural and cultural assets, and facilitating their sustainable use.'* Para. 15 highlights the role of SPP to set out how these outcomes should be delivered on the ground. By locating the right development in the right place planning can provide opportunities for people to make sustainable choices and improve their quality of life.

Para. 28 states that the planning system should *'support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost'*.

SPP states that it is important that planning supports the role of town centres (*which includes city centres*), to thrive and meet the needs of their residents, businesses and visitors for the 21st century. The 'town centre first' principle, stemming from the Scottish Government's Town Centre Action Plan, promotes an approach to wider decision-making that considers the health and vibrancy of town centres.

The section of Promoting Town Centres states that out-of-centre locations should only be considered for uses which generate significant footfall where:



- all town centre (*including city centre*), edge of town centre and other commercial centre options have been assessed and discounted as unsuitable or unavailable;
- the scale of development proposed is appropriate, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location;
- the proposal will help to meet qualitative or quantitative deficiencies; and
- there will be no significant adverse effect on the vitality and viability of existing town/city centres.

Planning authorities, developers, owners and occupiers should be flexible and realistic in applying the sequential approach, to ensure that different uses are developed in the most appropriate locations.

In its section on 'Supporting Business and Employment', SPP identifies policy principles to:

- promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets;
- locate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and
- give due weight to net economic benefit of proposed development.

Paras 193 & 202-204 are of particular relevance in terms of 'Valuing the Natural Environment'. These sections underline the importance of planning in *'protecting, enhancing and promoting access to our key environmental resources, whilst supporting their sustainable use'*. It is noted that *'the siting and design of development should take account of local landscape character'*, also that *'developers should seek to minimise adverse impacts through careful planning and design, considering the services that the natural environment is providing and maximising the potential for enhancement'*. Para. 203 states that *'planning permission should be refused where the nature or scale of proposed development would have an unacceptable impact on the natural environment'*. Paragraph 207 sets out obligations in relation to sites designated as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), including the requirement for 'appropriate assessment' of the implications for conservation objectives where development is likely to have a significant impact.

In terms of promoting sustainable transport and active travel, paragraph 287 of SPP states in relation to Development Management functions that *'planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where:*

- *direct links to local facilities via walking and cycling networks are not available or cannot be made available;*
- *access to local facilities via public transport networks would involve walking more than 400m; or*
- *the transport assessment does not identify satisfactory ways of meeting sustainable transport requirements.'*

## **Aberdeen Local Development Plan (2017)**

### D1: Quality Placemaking by Design

All development must ensure high standards of design and have a strong and distinctive sense of place which is a result of context appraisal, detailed planning, quality architecture, craftsmanship and materials. Proposals will be considered against six essential qualities: distinctive; welcoming; safe and pleasant; easy to move around; adaptable; resource efficient.

### D2: Landscape

Developments will have a strong landscape framework which improves and enhances the setting and visual impact of the development, unifies urban form, provides shelter, creates local identity and promotes biodiversity. Quality development will:

- be informed by the existing landscape character, topography and existing features to sustain local diversity and distinctiveness, including natural and built features such as existing boundary walls, hedges, copses and other features of interest;

- conserve, enhance or restore existing landscape features and should incorporate them into a spatial landscape design hierarchy that provides structure to the site layout;
- create new landscapes where none exist and where there are few existing features;
- protect and enhance important views of the City's townscape, landmarks and features when seen from busy and important publicly accessible vantage points such as roads, railways, recreation areas and pathways and particularly from the main city approaches;
- provide hard and soft landscape proposals that is appropriate to the scale and character of the overall development.

### D3: Big Buildings

The most appropriate location for big buildings is within the city centre and its immediate periphery. Big buildings must be of a high quality design which complements or improves the existing site context.

### NC1: City Centre Dev - Regional Centre

The city centre is the preferred location for retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating development serving a city-wide or regional market. Proposals for new retail, office, hotel, commercial leisure, community, cultural and other significant footfall generating development (unless on sites allocated for that use in this plan) shall be located in accordance with the sequential approach referred to in this section of the Plan and in Supplementary Guidance.

### NC4: Sequential Approach and Impact

All significant footfall generating development appropriate to town centres (unless on sites allocated for that use in this plan) should be located in accordance with the hierarchy and sequential approach as set out below and detailed in Supplementary Guidance:

Tier 1 : Regional Centre

Tier 2 : Town Centres

Tier 3 : District Centres

Tier 4 : Neighbourhood Centres

Tier 5 : Commercial Centres

In these circumstances, proposals serving a catchment area that is city-wide or larger shall be located in the city centre if possible.

### NC5 - Out of Centre Proposals

All significant footfall generating development appropriate to designated centres, when proposed on a site that is out-of-centre, will be refused planning permission if it does not satisfy all of the following requirements (unless on sites allocated for that use in this plan):

1. No other suitable site in a location that is acceptable in terms of Policy NC4 is available or likely to become available in a reasonable time.
2. There will be no adverse effect on the vitality or viability of any centre listed in Supplementary Guidance.
3. There is in qualitative and quantitative terms, a proven deficiency in provision of the kind of development that is proposed.
4. The proposed development would be easily and safely accessible by a choice of means of transport using a network of walking, cycling and public transport routes which link with the catchment population. In particular, the proposed development would be easily accessible by regular, frequent and convenient public transport services and would not be dependent solely on access by private car.
5. The proposed development would have no significantly adverse effect on travel patterns and air pollution.

### I1: Infrastructure Delivery & Planning Obligations

Development must be accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of developments proposed. Where development either individually or cumulatively will place additional demands on community facilities or infrastructure that would necessitate new facilities or exacerbate deficiencies in existing provision, the Council will require the developer to meet or contribute to the cost of providing or improving such infrastructure or facilities.

T2: Managing the Transport Impact of Dev

Commensurate with the scale and anticipated impact, new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel. Transport Assessments and Travel Plans will be required for developments which exceed the thresholds set out in Supplementary Guidance. The development of new communities should be accompanied by an increase in local services and employment opportunities that reduce the need to travel and include integrated walking, cycling and public transport infrastructure to ensure that, where travel is necessary, sustainable modes are prioritised. Where sufficient sustainable transport links to and from new developments are not in place, developers will be required to provide such facilities or a suitable contribution towards implementation. Further information is contained in the relevant Supplementary Guidance which should be read in conjunction with this policy.

T3: Sustainable and Active Travel

New developments must be accessible by a range of transport modes, with an emphasis on active and sustainable transport, and the internal layout of developments must prioritise walking, cycling and public transport penetration. Links between residential, employment, recreation and other facilities must be protected or improved for non-motorised transport users, making it quick, convenient and safe for people to travel by walking and cycling. Existing access rights, including core paths, rights of way and paths within the wider network will be protected and enhanced. Recognising that there will still be instances in which people will require to travel by car, initiatives such as like car sharing, alternative fuel vehicles and Car Clubs will also be supported where appropriate.

T4: Air Quality

Development proposals which may have a detrimental impact on air quality will not be permitted unless measures to mitigate the impact of air pollutants are proposed and agreed with the Planning Authority.

T5: Noise

In cases where significant exposure to noise is likely to arise from development, a Noise Impact Assessment (NIA) will be required as part of a planning application. There will be a presumption against noise generating developments, as identified by a NIA, being located close to noise sensitive developments, such as existing or proposed housing, while housing and other noise sensitive developments will not normally be permitted close to existing noisy land uses without suitable mitigation measures in place to reduce the impact of noise.

B6: Pipelines, Major Hazards and Explosives storage sites

Where certain types of new development are proposed within the consultation zones of pipelines, major hazards and explosive storage sites, the Council will be required to consult the Health and Safety Executive (HSE) to determine the potential risk to public safety. The Council will take full account of the advice from the HSE in determining planning applications. In addition to consultation with the HSE, the Council will consult the operators of pipelines where development proposals fall within these zones. Pipeline consultation zones are shown on the LDP Constraints Map.

NE2: Green Belt

No development will be permitted in the Green Belt for purposes other than those essential for agriculture; woodland and forestry; recreational uses compatible with an agricultural or natural setting; mineral extraction/quarry restoration; or landscape renewal. The following exceptions apply to this policy:

1. Proposals for development associated with existing activities in the green belt will be permitted but only if all of the following criteria are met:
  - a. The development is within the boundary of the existing activity;
  - b. The development is small-scale;
  - c. The intensity of activity is not significantly increased; and
  - d. Any proposed built construction is ancillary to what exists.
2. Essential infrastructure (such as electronic communications infrastructure, electricity grid connections, transport proposals identified in the LDP or roads planned through the masterplanning of opportunity sites) will only be permitted if it cannot be accommodated anywhere other than the Green Belt.

3. Buildings in the Green Belt which have a historic or architectural interest, or a valuable traditional character, will be permitted to undergo an appropriate change of use which makes a worthwhile contribution to the visual character of the Green Belt. Please see relevant Supplementary Guidance for detailed requirements.
4. Proposals for extensions of existing buildings, as part of a conversion or rehabilitation scheme, will be permitted in the Green Belt provided:
  - a. The original building remains visually dominant;
  - b. The design of the extension is sympathetic to the original building in terms of massing, detailing and materials, and
  - c. The siting of the extension relates well to the setting of the original building.
5. Replacement on a one-for-one basis of existing permanent houses currently in occupation will normally be permitted provided:
  - a. It can be demonstrated to the Council that they have been in continuous occupation for at least 5 of the seven years immediately prior to the date of the application;
  - b. The replacement house, except in exceptional circumstances (e.g. to improve a dangerous access), occupies the same site as the building it would replace. Where replacement houses are permitted on sites different from the original site, the original house will require to be removed;
  - c. Replacement houses should be of a scale, design and external appearance that contributes to the visual character of the Green Belt.

All proposals for development in the Green Belt must be of the highest quality in terms of siting, scale, design and materials. All developments in the Green Belt should have regard to other policies of the Local Development Plan in respect of landscape, trees and woodlands, natural heritage and pipelines and control of major accident hazards.

#### NE5: Trees and Woodland

There is a presumption against all activities and development that will result in the loss of, or damage to, trees and woodlands that contribute to nature conservation, landscape character, local amenity or climate change adaptation and mitigation. Buildings and services should be sited so as to minimise adverse impacts on existing and future trees.

#### NE6: Flooding, Drainage & Water Quality

Development will not be permitted if:

1. It would increase the risk of flooding: a) by reducing the ability of the functional flood plain to store and convey water; b) through the discharge of additional surface water; or c) by harming flood defences.
2. It would be at risk itself from flooding;
3. Adequate provision is not made for access to waterbodies for maintenance; or
4. It would require the construction of new or strengthened flood defences that would have a significantly damaging effect on the natural heritage interests within or adjacent to a watercourse.

#### NE8: Natural Heritage

Sites protected by natural heritage designations are an important consideration in the planning process. Notes the requirement for Habitats Regulations assessment in specified circumstances, and sets out that development that would have an adverse impact on designated sites will only be permitted where there are no alternative solutions and there are imperative reasons of overriding public interest, including those of a social or economic nature, and compensatory measures are provided.

Highlights requirement surveys, protection plans and necessary mitigation measures where there is a likelihood of protected species being present.

#### NE9: Access and Informal Recreation

New development should not compromise the integrity of existing or potential recreational opportunities including general access rights to land and water, Core Paths, other paths and rights of way. This includes any impacts on access during the construction phase of a development. Wherever possible, developments should include new or improved provision for public access, permeability and/or links to green space for recreation and active travel.

#### R2: Degraded & Contaminated Land

The City Council will require that all land that is degraded or contaminated, including visually, is either restored, reclaimed or remediated to a level suitable for its proposed use. This may involve undertaking site investigations and risk assessments to identify any actual or possible significant risk to public health or safety, or to the environment, including possible pollution of the water environment, that could arise from the proposals. Where there is potential for pollution of the water environment the City Council will liaise with SEPA. The significance of the benefits of remediating a contaminated site, and the viability of funding this, will be taken into account when considering proposals for the alternative use of such sites.

#### R6: Waste Management Requirements for New Development

All new developments should have sufficient space for the storage of general waste, recyclable materials and compostable wastes where appropriate. Recycling facilities should be provided in all new superstores or large supermarkets and in other developments where appropriate. Details of storage facilities and means of collection must be included as part of a planning application for any development which would generate waste.

#### R7: Low & Zero Carbon Buildings & Water Efficiency

All new buildings, must meet at least 20% of the building regulations carbon dioxide emissions reduction target applicable at the time of the application through the installation of low and zero carbon generating technology.

To reduce the pressure on water abstraction from the River Dee, and the pressure on water infrastructure, all new buildings are required to use water saving technologies and techniques.

#### CI1: Digital Infrastructure

All new residential and commercial development will be expected to have access to modern, up-to-date high-speed communications infrastructure.

### **Supplementary Guidance and Technical Advice Notes**

#### Supplementary Guidance

Planning Obligations  
Resources for New Development  
Trees and Woodlands  
Air Quality  
Big Buildings  
Flooding, Drainage and Water Quality  
Landscape  
Hierarchy of Centres  
Natural Heritage  
Noise  
Transport and Accessibility  
Planning Obligations

#### Technical Advice Note

Natural Heritage

### **Other Material Considerations**

Aberdeen City and Shire Strategic Development Plan (2014) (SDP)

The SDP sets out a series of key objectives for the growth of the City and Aberdeenshire. It is framed around a vision, spatial strategy and a series of aims and objectives; with those relating to economic growth, sustainable mixed communities, quality of environment and accessibility being the most relevant to this application. The SDP sets a strong framework for investment decisions, and its purpose is to focus the right development in the right places and to prevent inappropriate and poorly located development.

In terms of the plan's spatial strategy (p8- 23), the proposed stadium falls within the outer edge of the Aberdeen City "Strategic Growth Area" (p12-14). The plan explicitly supports the principle of the development of "a new community stadium, a regionally important facility which will bring economic, social and cultural benefits" (para 3.24, Diagram – p13 and Schedule 2). Two possible locations are identified – on and around the current stadium site at Pittodrie / Kings Links and to the south of the city as part of the Loirston development.

The SDP acknowledges the importance of Aberdeen City Centre as being vital to the economic future of the area (SDP para 3.21). The regeneration of the City Centre and a number of city communities is vital to reduce inequality (paras 3.47 and 3.48). A key facet of this is acknowledging that a varied mix of uses must be maintained and expanded in order to have a successful city which is attractive to business, residents and tourists. The importance of reducing travel distances and making walking, cycling and public transport more attractive is also highlighted as vital for the future (para 3.16). This again focuses attention on the City Centre or sites that are well connected to existing or planned communities.

#### Local Transport Strategy (2016-2021)

The vision for the Local Transport Strategy is to develop "A sustainable transport system that is fit for the 21st Century, accessible to all, supports a vibrant economy, facilitates healthy living and minimises the impact on our environment". Its five associated high-level aims are:

1. A transport system that enables the efficient movement of people and goods.
2. A safe and more secure transport system.
3. A cleaner, greener transport system.
4. An integrated, accessible and socially inclusive transport system.
5. A transport system that facilitates healthy and sustainable living.

These are underpinned by five identified outcomes. By 2021 Aberdeen's transport system should have:

- A. Increased modal share for public transport and active travel;
- B. Reduced the need to travel and reduced dependence on the private car;
- C. Improved journey time reliability for all modes;
- D. Improved road safety within the City;
- E. Improved air quality and the environment; and,
- F. Improved accessibility to transport for all.

#### Strategic Infrastructure Plan

Aberdeen City Council's Strategic Infrastructure Plan (SIP) focuses on the delivery of Strategic and Local Development Plans and also identifies five key infrastructure goals, as follows:

- A step change in the supply of housing;
- High quality digital connectivity at home and at work;
- Better local transport;
- The skills and labour that Aberdeen needs to thrive;
- A better image for Aberdeen.

Specifically in relation to a new football stadium, the SIP states that the city council will be continuing negotiations with Aberdeen Football Club and others on the establishment of a new stadium at Loirston.

#### Aberdeen City Centre Masterplan (CCMP)

Approved by the Full Council in June 2015, the CCMP outlines a 20 year development strategy for Aberdeen City Centre. It identifies a series of ambitious but deliverable projects that will support future economic growth and will secure more benefits and opportunities for the communities of Aberdeen City and Shire. The projects are complemented by a robust, costed and achievable delivery programme and together these provide a framework for managing city centre development up to 2035. The strategy for the CCMP is focused on reviving the historic core and incorporating areas of growth between the Denburn and the River Dee.

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## **Environmental Statement**

This proposal was subject to Environmental Impact Assessment as a “Schedule 2 Development”, by virtue of the characteristics of the proposed development and its potential impacts. This was established via a process of EIA Screening and confirmed via a Screening Opinion issued by Aberdeen City Council, which identified that the project falls within Schedule 2 Class 10(b) of the EIA Regulations, relating to Infrastructure Projects. An Environmental Statement (ES) was submitted with the planning application.

The ES reports on the findings of an environmental impact assessment (EIA) of the proposed development. EIA is the process of compiling, evaluating and presenting all of the significant environmental impacts of the proposed development, leading to the identification and incorporation of appropriate mitigation measures. The range of potential impacts considered in the ES fall under the following chapter headings: Planning Policy and Alternative Sites Considered; Ecology, Biodiversity and Nature Conservation; Landscape and Visual Impact Assessment; Historic Environment; Water Resources, Hydrology, Flood Risk and Drainage; Ground Conditions, Hydrogeology, Geology and Soils; Traffic, Transportation and Access; Air Quality; Noise and Vibration; Socioeconomics. Having set out the impacts of the development in each of these areas, the EIA subsequently sets out a consolidated Schedule of Mitigation.

The EIA, dated January 2017, was supplemented by further information sought by the planning authority under Regulation 23 of the relevant EIA Regulations (dated 17<sup>th</sup> May 2017).

The ES includes a Schedule of Mitigation (at Chapter 14), which summarises the proposed environmental mitigation measures that would be undertaken by the applicant/contractor, or other parties, to avoid, reduce or offset environmental effects before, during and after construction and during the operation of the development.

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## **NEXT STEPS**

A report will be prepared by officers for Full Council with a recommendation assessing the proposed development and making a recommendation to members.