

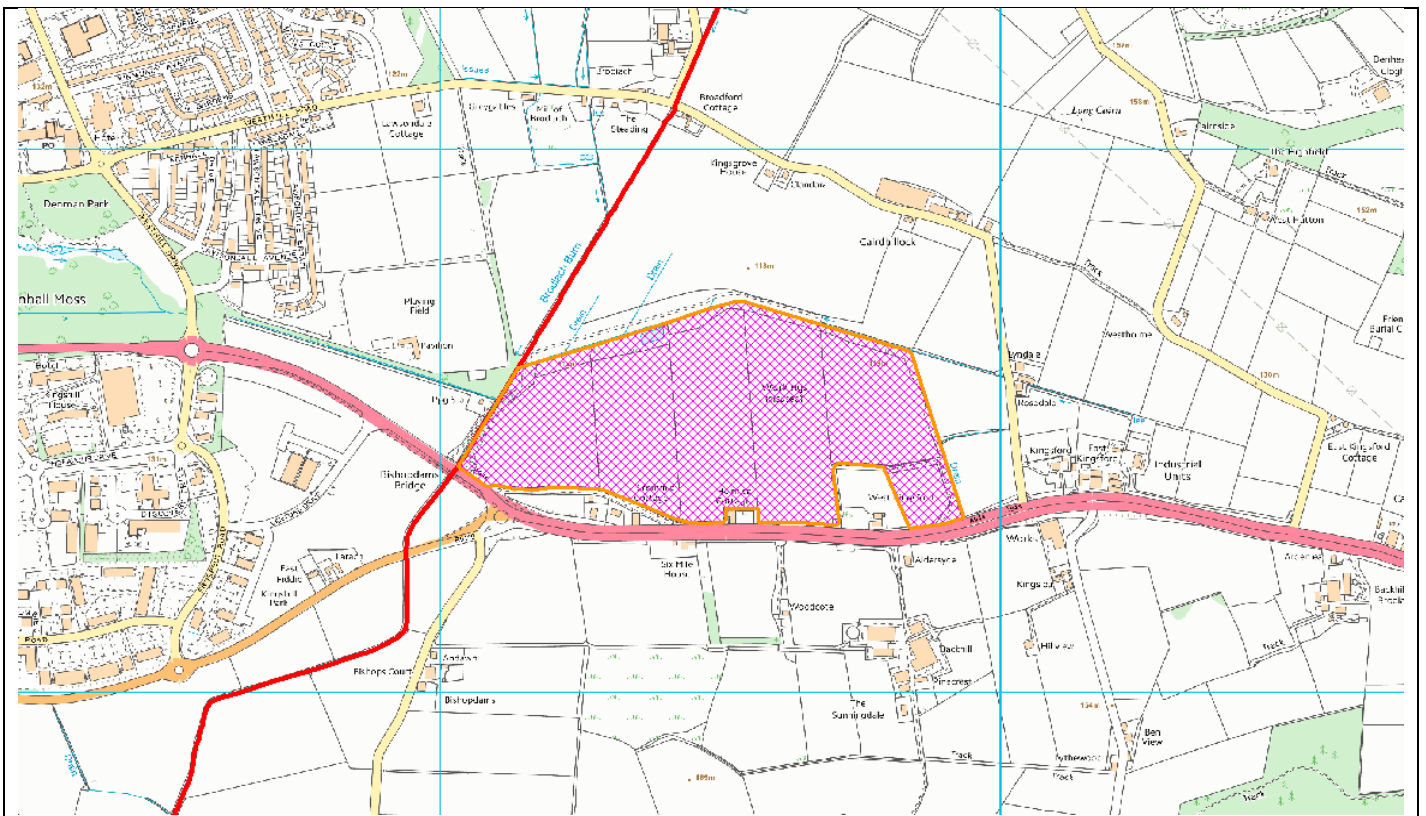


Pre-Determination Hearing (Full Council)

Report by Development Management Manager

Date: 17th January 2018

Site Address:	Land At West Kingsford (North Of The A944 Road), Skene Road, Aberdeen, AB15 8QR
Application Description:	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
Application Reference:	170021/DPP
Application Type	Detailed Planning Permission
Application Date:	11 January 2017
Applicant:	Aberdeen FC Community Trust & Aberdeen Football Club Plc
Ward:	Kingswells/Sheddocksley/Summerhill
Community Council	Kingswells
Case Officer:	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 second 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. This report concentrates on the additional supporting information submitted by the applicants on 21st November 2017, and the representations and consultation responses received in relation to those submissions – on the basis that these additional submissions are the reason for and primary focus of this second pre-determination hearing. However, it is important to point out that this second pre-determination hearing report has to be read in the context of the earlier report for the first pre-determination hearing, which provides important planning policy background and detail of the representations made and consultation responses received up until that point. The first report is attached at Appendix 1.

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

Per PDH1 report (appended).

APPLICATION DESCRIPTION

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 identified 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, Souterhead 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)
- Supporter Bus Travel & Shuttle Bus Strategies (post-hearing, dated 21st Sept 2017);
- Letter from SFA Chief Operating Officer, Andrew McKinlay, relating to benefits of co-location;
- Training Facilities User Schedule
- Halliday Fraser Munro Supporting Statement (with appendices A-P)

Pre-Application Consultation

Per PDH1 report (appended).

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.

A Hearing site visit was undertaken by the Planning Development Management Committee, with invitation extended to all Councillors, on Monday 11th September to familiarise members with geographical context of the site and the positioning, appearance and scale of, and means of access to, the proposed development.

A previous Pre-Determination Hearing (PDH1) took place on Wednesday 13th September 2017. The Hearing afforded the applicant and those people who submitted written representations on the proposed development the opportunity to present verbally their arguments/case directly to the Planning Development Management Committee, which on this occasion, was open to all Members of the Council. The minute from that hearing can be found on the Council website along with the agenda pack –

<https://committees.aberdeencity.gov.uk/ieListDocuments.aspx?CId=348&MId=5831&Ver=4>

This further hearing (PDH2) is required as a result of further supporting information being submitted by the applicants. The planning authority has considered it necessary to allow a further opportunity for written representations to be made in relation to that additional supporting information. In order to satisfy the regulatory requirement for all those making representations to be afforded an opportunity to be heard, it has been necessary to hold this further 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

Below is a summary of new/additional consultation responses in the period since the earlier Pre-Determination Hearing. These should be read in conjunction with the responses summarised in the attached PDH1 report.

ACC - Roads Development Management Team – In relation to the proposed pedestrian footbridge, further information was provided by the applicants to demonstrate adequate capacity. ACC Roads DM considers that the applicant has adequately justified the methodology used to calculate capacity, and has shown that a 3m wide footbridge is sufficient to accommodate up to 4,320 pedestrians in the 30 minute period following a match. The submitted Transport Assessment estimates that 3,380 supporters will use the bridge within this period. On this basis, it is concluded that the proposed pedestrian bridge has sufficient capacity to serve the development.

ACC – Economic Development - 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:

- Notes that the proposed development would provide a centre of excellence for sport, complementing the success of Aberdeen Sports Village.
- Notes that the Regional Economic Strategy identifies tourism and leisure as a priority sector, aiming to increase visitor spend in the North-East.
- States that the Kingsford proposal contributes to the overall ambition to diversity the city and regional economy and lever in additional investment into the region. It would offer opportunities to attract new sporting events to the city, maximising economic benefits that may not be possible under a ‘do-nothing’ scenario.

- As well as the potential to provide further events infrastructure to the north east, the development has potential to promote the north-east as a sporting destination. If these additional sporting events materialise, there is an opportunity, through the VisitAberdeenshire partnership, to maximise the opportunities for event-related and overnight/weekend business.
- Notes that, without a new stadium, AFC's European matches would have to be played in Dundee, whilst the ability to compete for friendly or underage football events, or rugby-related events, could be undermined.
- Recognises that the quantitative analysis presented by AFC assumes (i) higher attendances at Kingsford; (ii) attracting additional sporting events and music concerts at Kingsford; and (iii) the new stadium would attract additional functions and corporate events. A range of 'activity scenarios' have been considered to calculate and compare Gross Value Added (GVA) impacts.
- Notes that estimates of economic impact are in line with Her Majesty's Treasury (HMT) Green Book on Economic Appraisal of projects.
- The total additional economic contribution of delivering the Kingsford stadium compared with remaining at Pittodrie (assuming average 8,500 crowd) ranges from £8.535m to £9.529m of GVA per annum, equivalent to between 347 to 408 Full Time Equivalent additional jobs. These economic impacts are at the Aberdeen City and Shire spatial area.
- There are also 443 net additional construction jobs associated with the Kingsford option. While these jobs will provide a benefit to the regional economy, they are restricted to a 'one-off' impact and therefore they are not included in the total jobs contribution.
- The applicant has estimated a range of £0.51m to £1.78m per annum of spend in the city centre from being at Pittodrie according to assumptions made of the nature of spend by those who travel by car. This range is estimated to be the maximum potential loss of spend in the City Centre, as a result of moving to Kingsford.
- The applicant suggests that the loss is at the lower end of this range as many of those who currently travel by car are unlikely to spend in the City Centre while attending games at Pittodrie so will not constitute a loss to the City Centre in the Kingsford scenario. Further, many fans that do not currently travel by car are likely to get bus transport to Kingsford from the City Centre, and thus continue spending in the city centre as they currently do. The applicant's transport consultant forecasts bus capacity for around 2,500 fans travelling from the city centre to Kingsford, roughly in line with the number of supporters who do not currently rely on car travel to Pittodrie. Express satisfaction that the impact on the city centre is likely to be around the lower end of the range at around £0.51m per annum.
- Remaining at Pittodrie could present significant economic challenges in terms of the increased refurbishment costs this would involve and the difficulty in attracting additional major sporting events to the stadium. If this materialised, in turn it would have a negative impact on the reputation of Aberdeen city to compete for new and large scale events to the region that in turn contribute to the tourism/ leisure objectives in the regional economic strategy.
- For the club itself, the increased costs and any deterioration in terms of the stadium and/ or playing staff, under do-nothing scenarios, could in turn reduce the funds available to the

AFC playing budget which could result in lower attendances and lower economic benefits.

- The likely scale of economic benefit at Kingsford is predicated on a range of activity scenarios driven by attendance volumes. In turn, attendance relies on the success of the team and the club. Therefore there is some uncertainty around the likely scale of the economic benefit of the Kingsford option. Similarly the ability of the club to convert opportunities for new and additional football or other sporting activity is not yet known and would form part of the club's business planning,
- The analysis does show however that in the context of the scale of challenges in operating the club under a 'do nothing' scenario, the net benefit under the Kingsford option does offer a significant economic benefit of the project.

Aberdeen City/Shire Developer Obligations Team – Contributions are required in relation to anticipated increased usage of the Core Path Network – specifically Core Path 91.

No financial contribution towards Open Space provision is required, as adequate provision is made within the development.

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 (SDPA) – Restates earlier position that the development in its current form and location does not accord with the Strategic Development Plan (SDP), would result in the loss of 25ha of Green Belt land and the coalescence of urban areas. The development be inappropriately sited, giving rise to unsustainable travel patterns in a manner contrary to the modal shift sought by the SDP. Further, there would be a negative impact on the city centre.

The following specific points are also made within the SDPA's most recent response:

- It has not been demonstrated that co-location is necessary. Whilst the additional information highlights issues of deliverability with sequentially preferable sites, the consideration of alternatives has been undertaken on the basis of fixed requirements for a certain size of site, rather than on the basis of site suitability. SDPA reiterates its view that the sequential test should be carried out on the basis of separating the stadium and training facilities.
- It is demonstrated that there is not a suitable allocated site of 25ha within Aberdeen City.
- Submissions contend that there is insufficient developable land available at Loirston to build stadium and required parking – agree that this seems to be the case.
- Suggests it is unlikely that the pedestrian footbridge will be sufficient. Notes that design shows no disabled access, but assumes this could be addressed through assessment of a specific planning application for the bridge.
- Previously raised concerns regarding loss of jobs in Seaton and impact on City Centre from lost revenue. Aberdeen & Grampian Chamber of Commerce (AGCC) new material suggests more jobs would be created than envisaged by the earlier EKOS report. Notes

that this more optimistic view is based on a series of assumptions. Job losses and loss of revenue is presented as low in context of overall North East economy, but these are still potentially significant to small enterprises. Discussion of benefits focuses on Kingsford and for AFC, but given the increased focus on the regeneration of Aberdeen city centre and recognition of its value as a regional asset, the loss of employment and business revenue seems to undermine such efforts.

- The assumptions made in relation to additional events suggest a greater intensity of use, and would appear to contradict the applicants' assertion that it would be an intermittently used facility,

Aberdeenshire Council – Aberdeenshire Council maintains its objection to the development for the reason given below:

Aberdeenshire Council object 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 was up-to-date and relevant to the application. The proposal would 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 contrary to the development plan and it is not considered that sufficient material considerations have been demonstrated that indicates the application should be supported.

The following comments are made in relation to matters raised by the new supporting statement (November 2017):

- Notes that the Supporting Statement asserts that the stadium and training facilities would each require at least 12.5ha, which appears excessive compared to the requirements of other clubs;
- Notes further information provided to evidence issues with the delivery of the development at Loirston and King's Links, and highlights that it will be for Aberdeen City Council to assess the merits of the case put forward.
- Highlights that the work of the AFC Community Trust must be recognised and commended. Notes however that access to facilities for community use unrelated to the AFC Trust is unclear (e.g. access for residents and local community or sports groups).
- The new economic analysis prepared by Aberdeen & Grampian Chamber of Commerce (AGCC) suggests that substantially more jobs would be supported by the proposed development than had been anticipated in the earlier EKOS report. This appears to be based on some major assumptions around the ability of AFC to attract major events on an annual basis. Recognises that opportunities would arise from a new stadium development, but notes that other scenarios are possible. Whilst the AGCC analysis is more attractive and if realised would create many more jobs, some assumptions made are optimistic. Conversely, notes that the 'do nothing' scenario appears to predict a steady decline in attendance from the current base of 13,083 to 8,500-10,000, with a consequent effect on figures quoted for jobs sustained and GVA (Gross Value Added).
- Aberdeenshire Council does not agree that the pedestrian capacity of the proposed footbridge over the A944 has been demonstrated to be sufficient. Assumptions within the Transport Assessment with regards to the level of traffic generation do not fully reflect the

potential traffic levels or resulting pedestrian flows associated with the full extent of available parking in Arnhall or a lack of delivery/enforcement of a Controlled Parking Zone (CPZ) in Westhill. Notes also that there is no form of crowd control designed into the layout of the footbridge, and that its current design demonstrates a lack of compliance with national standards, which would present a real disincentive to many users, especially those with reduced mobility and similar disabilities.

- Previously states concerns in relation to traffic impact, controlled parking zone, impact of a pedestrian overbridge as an entrance to Westhill, and the potential negative impact on Westhill town centre on match days remain applicable.

Community Council: Kingswells – Object and recommend that the application be refused.

In response to the most recent submissions (**November 2017**), KCC makes the following points:

- Acknowledges a range of differing views held within the local community, and states that the KCC response does not represent the views of all within the community or within KCC.
- The KCC retains its position of objection.
- Reiterates conflict with Green Belt policy NE2 and expresses concern regarding a precedent being set for Green Belt development. Considers that there is no mitigation possible for the loss of this Green Belt land. States that the Green Belt land remaining after the proposed development would not be able to fulfil the intended function of Green Belts.
- Fixed 25ha land requirement – Queries AFC's stated requirement for 25ha of land which, if separated would require 2no separate sites of 12.5ha. Suggests that the area of land required for any given development is dependent on site layout, and that it may well be possible to accommodate either the stadium or training complex on a site of less than 12.5ha. There is no evidence that smaller sites have been considered, and it appears that the site selection process was carried out retrospectively using the area of the Kingsford site as a fixed requirement.
- Pedestrian bridge – note that the walking speed for crowded situations which is used by AFC is specifically and explicitly intended for scenarios where walking on level ground, but has been applied inappropriately to a scenario involving stairs. This serves to overstate the capacity of the bridge. Suggests that a lower walking speed would require a wider stair of circa 8m to provide adequate capacity. Suggests that an underpass may be a better solution. If a bridge it to be progressed, options for the use of a ramp should be considered.
- Economic Benefit – the evidence base for this assessment is not transparent. Highlights perceived discrepancies in the statements of economic benefit made by Aberdeen & Grampian Chamber of Commerce (AGCC). Suggests that the figures quoted for jobs are unlikely to be realised, and that there would be minimal job creation directly associated with the development. Highlights that the statement of economic benefit does not account for the cost to the local community, including travel delays. KCC considers that the economic benefits are largely to AFC itself, and the benefits of the development do not outweigh the loss of Green Belt land.
- Transport Assessment – reiterates concerns relating to the Transport Assessment and the development's reliance on car-borne travel. Highlights the potential for additional use of off-site parking to further increase congestion. Notes that AFC make reference to concerts in their economic benefits assessment, but there are not factored in to the transport assessment or pedestrian overbridge design.
- KCC accepts that the proposed development would be of benefit to the local community in providing public access to those new facilities;
- Oil and gas pipelines – highlights the recent leak from a pipeline near Netherly, which has required road closures and house evacuations. Acknowledges that the likelihood of a leak

is very small, but the potential harm could be catastrophic. Suggests that the proximity of the stadium to existing pipelines warrants review in this context.

Community Council: Cults, Bieldside And Milltimber– No further response to consultation.

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

In response to the most recent submissions (**November 2017**), the W&ECC stated that whilst this additional information adds detail to issues such as wildlife and flooding, it does not address the fundamental flaws in the application, nor the main planning policy issues outlined in W&ECC's previous objection. The further response raises the following matters:

- Retain significant concern over the loss of Green Belt land. With respect to the Dundee Tesco case cited in AFC's submissions, W&ECC highlights that the Asda development was on a large derelict site, and therefore is not directly comparable to Kingsford.
- AFC has not demonstrated a flexible approach, relying on an argument that 25ha is needed and that co-location of the stadium and training facilities is a necessity as the basis for discounting sequentially preferable sites.
- Highlights that Pittodrie is a 5.8ha site, and that a new stadium requires much less land than stated by AFC. Similarly, a training complex is estimated to require much less land than claimed. The 25ha (or 2 x 12.5ha) stated by AFC is considered to be a vast overstatement of the land-take required.
- Queries whether Aberdeen City Council would be entitled to break the existing lease (Golf centre/driving range) at King's Links.
- New documents suggest that AFC has selected Green Belt land on the basis that it is cheaper to purchase, which is not adequate justification for the loss of Green Belt land.
- Reiterates concerns regarding ribbon development along the AWPR corridor as a result of this application being approved.
- Reiterates concerns regarding noise, light and the impact on nearby housing. Emphasises that the character of the local area would be transformed from open green space to being dominated by an illuminated stadium.
- In terms of the stated economic benefits, W&ECC highlights that the GVA and FTE figures states within Appendix P do not have verifiable sources, nor are they accompanied by calculations or tables which would allow these claims to be substantiated.
- Express concerns regarding severe negative visual impact arising from a pedestrian footbridge being erected at the entrance to Westhill, on the A944.
- Indicates that the technical data provided in support of this crossing applies to ground-level pedestrian crossings, and are not relevant to the proposed footbridge and the large pedestrian volumes associated with use of a stadium. Draws distinctions between the SECC Hydro example cited and the proposed footbridge at Kingsford.

REPRESENTATIONS

1422 valid and timeously made representations were made in relation to the additional information lodged in November 2017. A proportion of those came from respondents who had already made representation in relation to the application. In such instances all comments from the same respondent will be counted as a single representation, in accordance with the Council's established practices.

The updated total of valid and timeously made representations received in relation to this application, including accounting for multiple submissions by a single respondent, is 10,705. Of these, 5,693 (53.2%) are in support of the proposal, 4,992 (46.6%) state objection, and 20 (less than 0.2%) are neutral in content.

A consolidated list of the matters raised in representations will be provided in a future report to Full Council, which will address those matters raised. The appended hearing report from 13th September 2017 (PDH1) includes a summary of matters raised up to that point, many of which are reiterated in the current batch of representations. New matters raised, over and above those already summarised in the PDH1 report, can be categorised into a series of general topics and summarised as follows:

National, Regional and Local planning policy

- *Contrary to the majority of policies contained within the current Aberdeen Local Development Plan (LDP), which is up to date having been adopted in January 2017;*
- *The proposal fails to embrace the function of the green belt to provide a buffer between communities and would result in continuous ribbon development along the north side of the A944*
- *The proposal is contrary to Policy NC5 of the LDP as suitable alternative sites are identified in the development plan (King's Links and Loirston), there would be an adverse impact on the vitality and viability of Westhill, there is no proven qualitative or quantitative deficiency of this kind of development, it is in an unsustainable location and would result in local economic losses*

Co-location, site selection and sequential test

- *The 2008 Aberdeen Community Arena Full Business Case did not see the King's Links lease as an insurmountable barrier – it made proposals for the relocation of the golf driving range as part of site acquisition;*
- *A review of any contract between ACC and Craig Group should be carried out to explore the opportunity for ACC to cancel the lease of the driving range area for the "greater good" in order for a King's Links development to take place;*
- *The justification for site selection appears to be financial;*
- *AFC has adequately demonstrated that that King's Links and Loriston cannot be delivered;*
- *In terms of impact on the greenbelt, co-location is the preferred option rather than having two separate greenbelt sites;*
- *12.5 hectares for each element of the proposal (i.e. stadium and training facilities) is based purely on 'want' rather than 'need' - a review of stadia across Europe shows that a site of 8 hectares is more than sufficient for a stadium, for example Bristol City (27,000 capacity) sits in 3.8 hectares, Chelsea (41,663 capacity) 3.3 hectares, Rangers FC (50,817 capacity) 6.6 hectares, Arsenal (59,817 capacity) 8.0 hectares, Real Madrid (81,044 capacity) 7.2 hectares;*
- *The justification for site selection appears to be mainly financial rather than based on the most appropriate location – a site that is 'financially' lucrative/ available site does make it sequentially preferable;*
- *The cost to purchase land identified for development is not a material consideration*
- *No data has been presented to determine the impact on communities and businesses around Pittodrie;*
- *The assertion that AFC cannot afford to build on the designated areas (Kings Links or Loirston) is not a justification to remove the last area of greenbelt between Westhill and Kingswells or for discounting other more sequentially preferable sites;*

- *The added value of co-location is grossly overstated by the club and it is clear that most other greater clubs operate successfully across separate sites;*
- *The "benefits" of co-location are presented as an emotional sales-pitch rather than having demonstrably positive impact on the community;*
- *Co-location of the training facilities and the stadium is extremely beneficial as transportation costs and time will be greatly reduced compared to a split site facility.*
- *AFC has not demonstrated sufficient flexibility (as required by Scottish Planning Policy) and no due consideration of alternative sites and that the case for colocation of facilities is not successfully justified;*
- *The validity of statements by applicant that Pittodrie does meet UEFA requirements is questioned – the pitch size exceeds the minimum UEFA requirement for domestic play. Many teams across Europe have pitches that do not fully meet the International play requirements (e.g. Liverpool, Chelsea, Hearts, Dundee and Dundee United) yet they regularly accommodate European football*

Transport, accessibility and sustainability

- *Unsustainable location – car-reliant development. The transport strategy does not offer the sustainable transport arrangements that would be needed to support a development in the Green Belt;*
- *Whilst the applicant may have applied the HM treasury Green book Appraisal and Evaluation to the economic assessment, they did not apply the relevant guidelines to their supporter travel and shuttle bus strategy tables, which is a serious omission, as any significant variations in the numbers using shuttle buses will likely have direct and adverse impact on the number of supporters seeking to park at Kingsford;*
- *AFC's baseline figures for supporters seeking on-site or off-site parking sets an inordinately low expectation of the numbers who will travel by car. For an average match attendance, the number of cars seeking a parking space over and above planned is likely to be at least 1,000 cars. For a full capacity match, additional parking is likely to be 4,000-6,000 cars;*
- *It is remiss of the club to not apply a sensitivity analysis to the number of supporters either estimated or assumed to be driving to matches – sensitivity analyses carried out by NKS indicate that the number of cars for which parking has been provided could range between 1,000 and 3,500;*
- *It is human nature to seek to park as close as possible to the end destination and thus supporters may not try to use the Bridge of Don and Dyce P&R facilities;*
- *The CPZ is unenforceable;*
- *A 30 minute walk-to-me CPZ would result in restrictions being placed on 43.9km (27.2 miles) of streets in Westhill – it would take at least 2.2 police officers walking non-stop for 4 hours each to cover the required ground;*
- *The applicant has not committed to operate the CPZ in perpetuity (only a 5 year commitment is offered);*
- *The proposed shuttle bus system will not be the first choice for most travelling fans. Many reasons why supporters would not use shuttle buses – waiting in the cold, sitting on a shuttle bus in slow traffic for anything from perhaps 60min to 90min, people not happy with behaviour of other passengers, the large number of supporters having to wait at end of game for a shuttle bus;*
- *The supporter survey has not sought the opinions of visiting teams' supporters;*
- *The proposed pedestrian footbridge will not be used, instead, visiting fans will just run across the road;*
- *An underpass should be built instead of a pedestrian footbridge;*
- *The proposed bridge over the A944 at entrance of Westhill is intended to support unsustainable transportation provision/parking;*

- *The pedestrian bridge design is not fit for purpose (lack of disabled access);*
- *A new bridge will need to be of very high architectural standards, aesthetically pleasing and provide some built landscape merit;*
- *The bridge is not enclosed and would pose a threat to traffic passing below (throwing or dropping of objects);*
- *What is the contingency if planning permission is not granted for the bridge?;*
- *Who would maintain the bridge?*
- *The TA addresses only traffic arising from its own matches and not for other event at the stadium;*
- *Westhill does not have the infrastructure to cope with the volume of cars and other stadium road traffic which would add to the high traffic volumes that already exist. The influx of supporters would more than double the population of Westhill.*

Design, size and scale

- *The proposed footbridge would be an 'eyesore' and would create an opportunity for 'over-road' advertising space, to the detriment of visual amenity;*
- *The application claims that the footbridge will only be used for a minority of the games that would take place at the stadium. A permanent bridge would be put into place for little use, having would have an aesthetic impact on Westhill;*
- *The proposed 3m footbridge width is not sufficient to cater for the number of fans likely to use it;*
- *The claim that 12.5 hectares is required to develop a professional training facility is incorrect. Many clubs within the SPL operate successfully with training facilities of a smaller size.*

Economic and social benefits/ impacts

- *Any economic benefit attributable to the development is not site specific, and would likely be realised in any location within the city;*
- *Figures presented discount the potential spending of the majority of those attending football events, which significantly undervalue the spend of those attending Pittodrie and the income generated in the wider-city centre and Pittodrie area. The assessment is flawed and lacks clarity;*
- *A great deal is made of the requirement of the charitable trust to be located at the stadium and training facilities. The idea of the trust is to reach out to disadvantaged areas. Kingsford is located between two communities in the most advantaged 20% of the population;*
- *There is no credible evidence to support the claimed economic benefits of the stadium and therefore these do not represent sufficient justification to deviate from the LDP and established green belt policy*
- *AFC has significantly underestimated the volume of private car usage - the resultant impact will negatively affect the vitality and viability of Westhill as a Town Centre, diverting trade activity to other areas which would not be offset by any activity generated by the proposal*
- *There has been a gross overestimation of the economic benefit and that the data used by AGCC is weak. The local economic losses as a result of construction activity and match day traffic may be greater than any possible gains*
- *There is no specific reference to the guidance used in carrying out the economic assessment, the full economic model has not been made available, the assessment is confusing and is flawed as it does not take account of 'deadweight', it does not review the options required by HM Treasury Green Book, the economic impact is overestimated at a city level, the projected 35% drop in attendances at Pittodrie is challenged, the vast majority of the benefits would*

occur anyway and the 'Do nothing' scenario should be a 'Do minimum' as a worst case scenario, which would ensure the stadium is fit for purpose, meets regulations etc.;

- A £1.1M per annum GVA injection cannot be deemed to be significant;
- The economic benefits are based on the aspiration of the new stadium hosting 6 significant new events per year;
- The claims relating to public benefit are spurious given the out-of-centre location and the difficulty in accessing the site, especially for those in Aberdeen's most disadvantaged communities.

Other matters

- Details of the proposed pedestrian footbridge have not been submitted with the application;
- Planning permission is required for the proposed footbridge and has not been sought.

MATERIAL CONSIDERATIONS

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

Per PDH1 report (appended).

Aberdeen Local Development Plan (2017)

Per PDH1 report (appended).

Other Material Considerations

Per PDH1 report (appended).

Environmental Statement

Per PDH1 report (appended).

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.