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**From:** [REDACTED]@aberdeenshire.gov.uk> on behalf of Stephen Archer  
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**Sent:** 12 December 2017 13:59  
**To:** Eric Owens  
**Cc:** [REDACTED]  
**Subject:** AFC Consultation - Aberdeenshire Council Response  
**Attachments:** ACCouncil, AFC Consultation, Aberdeenshire Response December 2017.docx  
**Importance:** High

Dear Eric

Please find attached response from Stephen Archer, Director of Infrastructure Services, Aberdeenshire Council in relation to the above consultation.

Regards



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Our ref SA/ED  
Your ref

12 December 2017

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FAO - [REDACTED]

Dear Eric

**Proposal: 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 | Land At West Kingsford (North Of The A944 Road) Skene Road Aberdeen AB15 8QR**

Thank you for the consultation request for the above development which was received on 21 November 2017. Aberdeenshire Council has reviewed the further information submitted in connection with the planning application. Comments on the four key areas covered by the new supporting statement are:

Alternative sites and co-location

Our previous response concluded that the over-riding justification put forward for co-location appeared to be financial with reductions in capital and operational expenditure and other arguments not considered to be persuasive. It was highlighted that *if* alternative solutions were capable of being considered, other potential sites may not have been discounted so readily. It is noted in the Supporting Statement that it asserts that the stadium and training facilities each require at least 12.5ha, this would appear excessive compared to the requirements of other clubs.

It is noted that further justification has been provided for the selection of Kingsford as a site. The issues with delivery of the facility at Loirston and Kings Links are also noted and in the absence of any contrary information, must be accepted by Aberdeenshire Council. Ultimately it is for Aberdeen City Council to assess the case put forward and consider the acceptability of the proposal as a significant departure to the development plan.

### Public benefits

The work of Aberdeen Football Club Community Trust (AFCCT) and its contribution locally must be recognised and commended. It is noted that reference is made to a range of policy documents which the proposal is claimed to accord with.

One benefit that is less clear is the accessibility of the facility for community use. This was raised by Westhill & Elrick Community Council and the Garioch Area Committee in March 2017 and no further information appears to have been provided to clarify if the new facility would have a direct positive impact on affordable access for residents and local community or sports groups.

### Economic benefits

In terms of economic benefits, the new economic analysis prepared by Aberdeen & Grampian Chamber of Commerce (AGCC) suggests that substantially more jobs would be supported by the move to Kingsford than were previously anticipated by the EKOS report. This appears to be based on some major assumptions around the ability of AFC to attract a number of major events on an annual basis e.g. European football matches, men and women international football matches, an international rugby match, a music concert, eight conferences a year, fine dining etc.

Clearly opportunities exist and would arise from a new stadium and Aberdeenshire Council would wish AFC success with such a venture. However, other scenarios are possible and whilst the AGCC analysis is more attractive and if realised would create many more jobs, some assumptions made are optimistic and any extra jobs created are more likely to be created in Aberdeen City than in Aberdeenshire. Conversely, the 'do nothing' scenario appears to predict a steady decline in attendance from the current base of 13,083 attendance to 8,500-10,000 attendance with resulting differentials on jobs sustained and GVA generated by the development.

### Infrastructure improvements (pedestrian overbridge)

The information submitted states that it has been confirmed that there will be sufficient pedestrian capacity with the footbridge proposed over the A944. Aberdeenshire Council does not agree that this is the case and is not satisfied that the footbridge as proposed is developed or designed to an acceptable level to accommodate the required level of pedestrian transit over the A944.

This is due to assumptions in the Transport Assessment with regards to the level of traffic generation, which do not fully reflect the potential traffic levels or resulting pedestrian flows associated with the full extent of available parking in Arnhall or lack of delivery / enforcement of a controlled parking zone (CPZ) in Westhill. The information is deemed to be both insufficient and inappropriate (in the comparison to the Glasgow SSE Hydro footbridge) to address the clear risk of there being a significantly higher number of pedestrians crossing the A944 than has been assessed. In addition to this, there is no form of crowd control designed into the layout of the footbridge. Finally, the footbridge as currently shown 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.

### Other matters

Aberdeenshire Council would ask that previous concerns about traffic impact, the 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 as outlined in previous consultation responses are noted.

### Conclusion

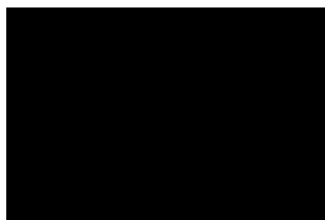
Having reviewed the further information submitted in support of the application, it is accepted that work has been done to attempt to justify why Kingsford is the preferred site. Reservations however remain about the scale of public and economic benefits the proposal claims will result and significant concerns remain about the proposed footbridge and access arrangements. I can therefore advise that 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.*

I also refer to your letter of 29 November 2017, with regards to the forthcoming Pre-Determination Hearing to be held on 17 January 2017. I can confirm that there will be no representation from Aberdeenshire Council.

I trust the above is in order, but should you have any questions or wish to discuss any of the above in greater detail then please contact [REDACTED], [REDACTED] on [REDACTED] or [REDACTED] [@aberdeenshire.gov.uk](mailto:[REDACTED]@aberdeenshire.gov.uk)

Yours sincerely



Stephen Archer  
Director of Infrastructure Services