

**From:** [REDACTED] <[REDACTED]@aberdeenshire.gov.uk>  
**Sent:** 12 December 2017 14:55  
**To:** Gale Beattie; Robert Gray; Eric Owens  
**Cc:** [REDACTED]  
**Subject:** Kingsford Referral Response  
**Attachments:** 2017\_12\_12 Kingsford Stadium (170021DDP) - SDPA Response (fourth submission) DRAFT.docx

Dear All,

I've attached a draft of the SDPA's latest stadium response.

[REDACTED] has already reviewed it and I have made changes accordingly.

Could you please review and let me know if you require any changes. Once I have your approval I will send on to Cllrs Boulton and Cox.

In the interim I have sent a draft copy to Aberdeen City's DM team so they can begin to incorporate it into the report if handling.

Regards,

[REDACTED]  
Aberdeen City and Shire SDPA

[REDACTED]@aberdeenshire.gov.uk  
[www.aberdeencityandshire-sdpa.gov.uk](http://www.aberdeencityandshire-sdpa.gov.uk)

**ABERDEEN** | Strategic Development  
CITY AND Planning Authority  
SHIRE

This e-mail may contain privileged information intended solely for the use of the individual to whom it is addressed. If you have received this e-mail in error, please accept our apologies and notify the sender, deleting the e-mail afterwards. Any views or opinions presented are solely those of the e-mail's author and do not necessarily represent those of Aberdeenshire Council. [www.aberdeenshire.gov.uk](http://www.aberdeenshire.gov.uk) Dh'fhaodadh fiosrachadh sochaire, a tha a-mhàin airson an neach gu bheil am post-dealain air a chur, a bhith an seo. Ma tha thu air am post-dealain fhaighinn mar mhearachd, gabh ar leisgeul agus cuir fios chun an neach a chuir am post-dealain agus dubh às am post-dealain an dèidh sin. 'S e beachdan an neach a chuir am post-dealain a tha ann an gin sam bith a thèid a chur an cèill agus chan eil e a' ciallachadh gu bheil iad a' riochdachadh beachdan Chomhairle Shiorrachd Obar Dheathain. [www.aberdeenshire.gov.uk](http://www.aberdeenshire.gov.uk)

<b>PLANNING PROPOSAL</b>	
<b>Local planning authority: Aberdeen City Council</b>	
<b>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</b>	
<b>Reference No: 170021/DPP</b>	<b>Date received: 21 November 2017</b>
<b>Case Officer:</b> [REDACTED]	<b>Target date: 12 December 2017</b>

<b>STRATEGIC PLANNING OBSERVATIONS</b>
<p><b>Context</b></p> <p>The SDPA responded to the initial consultation on 20 February 2017, with two supplementary response submitted on 17 July 2017 and 30 August following further information submitted by the applicant. This is therefore the fourth supplementary response, submitted in light of the further tranche of additional information submitted by the applicant on 21 November 2017 relating primarily to; alternative site and co-location, public benefits, economic benefits and pedestrian access via a footbridge.</p> <p><b>Alternative sites and co-location</b></p> <p>It has been asserted by the applicant that there are multiple benefits if the club bases all its facilities at one site. Previously submitted information implied that greater financial efficiencies were one of the main drivers to colocation and as such other sites were discounted on this basis. Further information has now been submitted which highlights delivery issues such as the lease at Kings Links or a reluctance to sell land to the applicant at Loirston.</p> <p>The applicant's latest supporting statement argues that the current zoning of the Kings Links site as Urban Green Space, Green Space Network and Coastal Management Area contradicts the SDPs identification of the site as a community stadium. Where in fact if a proposal were to come through the transparent LDP allocation process such policy issues could be addressed and the community properly engaged as opposed to speculative developments on unallocated sites.</p> <p>In terms of the Loirston site considerable time has passed since approval was granted for a stadium and land development has moved on. It is asserted that there is now insufficient developable land available on site to build a stadium and the required onsite parking. Judging by the footprint of the then proposal and current it would appear to be true.</p> <p>The above does not demonstrate the need for co-location except that there is not a suitable <b>allocated</b> 25ha site available within Aberdeen City. It is felt that the justification is still not sufficient to co-locate activities on one site. As advised in the SDPA response of the 30 August 2017 it would be better to conduct the sequential test on the basis of separating the stadium from the training facilities.</p> <p><b>Economic benefits</b></p> <p>In the SDPA's initial vote of 20 February 2017, concerns were raised about the potential</p>

loss of jobs in Seaton and the impact on the City Centre in terms of lost revenue generated through match day trade. The Aberdeen & Grampian Chamber of Commerce (AGCC) has submitted a separate economic assessment of the benefits of the proposal which suggests more jobs will be created by the proposal than were initially suggested in the EKOS report. This more optimistic view is predominantly based on assumptions of stadium attendances and AFC hosting further events such as European and International football games, concerts, conferences and fine dining.

More events would mean a greater intensity and would appear to contradict the applicant's assertion it would be an intermittently used facility. The additional information discusses the issue of job losses in a deprived area and the loss of revenue to city centre businesses. While the report suggests this may be low in terms of the overall north east economy it does not mean these sums are inconsequential to small enterprises. When benefits are discussed it is in a context of revenue generation at Kingsford and for AFC. At a time when there is increased focus on the regeneration of Aberdeen City and recognition of its value as a regional asset the potential loss of employment and business revenue undermines these efforts.

#### **Pedestrian overbridge**

The supporting information asserts that the proposed footbridge will be sufficient for the pedestrian movements across the A944. Given the volume of pedestrians crossing the A944 before and after games, the width of the bridge and the uncertainty regarding parking provision it is considered unlikely this is the case. The indicative design shows no disabled access but it is assumed that this would be addressed through the assessment of a detailed planning application.

### **OTHER OBSERVATIONS AND POLICY CONCLUSION**

The applicant has provided additional information in support of the application since its original submission on three occasions. While this is appreciated the revised information has not addressed the concerns raised in the SDPA's previous submissions. As such the SDPA's position remains the same.

The additional information suggests in order to be a financially successful development there needs to be a higher intensity of use. It is the SDPA's opinion the proposal is a 'high football generating use' as such a higher intensity of use would seem to confirm this. The justification for the need to co-locate the stadium with the training / community facilities has been updated and states sequentially preferable sites are not available, including sites at Loirston and Kings Links (identified in the SDP as potential stadium sites) as they are not 25Ha or that landowners are unwilling to sell to AFC. However if the proposed uses were at separate locations then a sequential test would follow the sequential 'town centre first' approach of SPP or accord with the aims and objectives of the SDP in that it would not be based on site size rather site suitability.

The SDPA understands and supports the desire of AFC to improve its facilities but the proposed development in its current form and location remains contrary to the Aberdeen City and Shire Strategic Development Plan. As previously stated; the proposal would result in the loss of 25Ha of greenbelt, the coalescence of urban areas (Westhill and Kingswells), would be an inappropriately located development. It would give rise to unsustainable travel patterns and be contrary to the modal shift sought by the SDP in that it has limited accessibility for active travel and public transport when compared to identified stadium sites in the SDP. Finally it is likely to have a negative impact on the City Centre.

**Author:** [REDACTED]

**Date:** 11 December 2017



*Note: This is a consultation response provided by the Aberdeen City and Shire Strategic Development Planning Authority (SDPA) to inform **Aberdeen City Council** in the exercise of its functions under the Town and Country Planning Act 1997. The SDPA does not (and cannot) form a view as to whether the application should be granted or refused. The weight to be attached to this response is a matter for **Aberdeen City Council**.*

DRAFT