



**170021/DPP | 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**

Mr G Prentice  
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5<sup>th</sup> July 2017

Dear Mr Prentice,

Westhill & Elrick Community Council (WECC) appreciate that we were informed of the responses from AFC in answer to the questions posed by Aberdeen City Council regarding this planning application. This was done by a representative of Fraser Halliday Munro delivering a huge file of very detailed technical answers to these questions. However, in this volume of pages, we did not read anything that addressed what we saw to be the fundamental flaws in the original application. Whilst this additional information adds detail to largely environmental issues including wildlife and flooding, it does not address the main planning policy issues which we outlined in our previous objection.

This proposal is for a significant development on virtually the only piece of remaining Green Belt land left between Westhill & Kingswells. This Green Belt land is there for a reason, protecting both communities from coalescence. Policy exists to protect these pieces of Green Belt land from development. We are extremely disappointed by some dismissive comments on the importance of the status of Green Belt. Through the Aberdeen Local Development Plan, other sites have been identified as suitable for such development, which we believe to be far more appropriate. However, AFC have been extremely reluctant to utilise these sites as identified through the planning process, as they would be unable to co-locate the stadium and training facilities. WECC do not understand why they have to be co-located, when other large football clubs do not see that as a necessity.

As the community that would be without doubt most affected by the impact of this planning application, we are disappointed that further information on other aspects of the proposal are not included. In our original objection to this application, we outlined our concerns, amongst others, over roads, transport and infrastructure. Within this supplementary information, we have discovered that the applicants have reverted to the maximum car parking requirements, rather than applying for more, which we believe would have an even



greater impact on our community. 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.

Despite the supplementary information which has been submitted, there are still many large areas of concern, which continue to raise questions which we do not believe have been answered. This latest information is presented in a manner which plays down the real planning policy issues regarding this application, to which our concerns have not been alleviated. Whilst we understand the detail presented as a response to the questions posed by Aberdeen City Council to the applicants, we do not see any new information which justifies the use of this site. Kingsford is simply the wrong site for such development.



We wish to emphasise that the comments made in this letter are in addition to our original objection, and do not replace our initial response, which is attached.

We very much appreciate the extension given for commenting on the supplementary information for this application, and await notification of the pre-determination hearing in due course.

Kind Regards,

Becky Ferguson

Secretary

On behalf of Westhill & Elrick Community Council





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## **Comment from Westhill and Elrick Community Council**

Westhill and Elrick Community Council (WECC) have spent a considerable amount of time examining the many documents included within the above planning application, and have produced this document in response. WECC are not opposed to a new stadium being built for Aberdeen Football Club (AFC), and we appreciate the importance of the football club to the whole of the North East. However following an in depth examination of the evidence presented in the planning application, we do not believe that the proposed site at Kingsford is suitable. Our community has been divided on this application, and we have endeavoured to listen to all views presented to us both at our monthly meetings and via email communications. This has brought many points to our attention, which have all been considered and many included in the detail of our response below.

**Our main concerns include the loss of Green belt land, the 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.**

## **Location of site**

- This site is located on land which is allocated as Green belt. Green belt is defined in the Aberdeen City and Aberdeenshire Strategic Development Plan (2014) as “An area of countryside where strict planning controls are in place to protect the landscape setting of the city, maintain the identity of places and provide land for recreation.” Both the SDP and the Aberdeen City Local Development plan (LDP), adopted 20 January 2017, identify the proposed site at Kingsford as Green belt. A football stadium is not listed as one of the possible exemptions to this policy. **WECC believe that Green belt land should be protected, and AFC have not provided sufficient justification to permit the use of Green belt for this type of development.**
- Currently, the land in question is an open space, giving a welcoming entrance to Westhill. It also provides a pleasant green space which protects the boundaries of both Westhill and Kingswells, ensuring each community maintains their own identity.
- Building a 20,000 seat football stadium on this site would have an adverse impact on the landscape setting forever. The character of the local area would be transformed from open green space to that dominated by an illuminated stadium. This would be extremely intrusive for local neighbours, who would then be living alongside such a large development, continually affected by both light and noise pollution. The impact of noise has not been demonstrated clearly within the application. The officers report to Garioch Area Committee stated that “The calculation of Road Traffic Noise Assessment does not appear to make reference to the potential number of buses which will be used to access the site, nor does it indicate the expected increase in road traffic noise from the development alone – instead comparing predictions for the 2023 noise levels taken from the AWPR



projections.” This proves the inadequacy of the assessment of the impact of noise on nearby properties.

- The loss of this area of Green belt land would only encourage further ribbon development along the A944, and would result in a definite coalescence between Westhill and Kingswells. Not only should the individual boundaries and identities of these communities be protected, but also the boundary of the City and Shire would then be extremely unclear.
- Previous planning applications in the same area of this site have been refused to comply with the requirements of both the SDP and LDP, to preserve the green belt and to avoid ribbon development and coalescence. These policies have not changed.
- The site in question is known by local residents to have flooding issues that could be exacerbated by this huge building and development. This is acknowledged by the applicant within the application, as they have plans for car park 2 to be a flood water holding zone if required. This car park consists of 805 spaces. This equated to at least half of the onsite car parking spaces if dispensation is allowed for 1600 spaces.
- Further to the above comments, WECC do not believe that alternative sites have been suitably considered, and seem to have been dismissed without giving in depth reasons as to why this decision has been made. Two alternative sites have been allocated through the LDP and we believe that they are much more suitable than Kingsford, even if the stadium and training facilities have to be split between these two. It is most unusual for football clubs to have their stadium and training facilities co-located.

**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.**

### **Roads, traffic and parking**

- Firstly, WECC wish to note that the Transport Assessment within this planning application is highly inadequate. The fact that the majority of the TA is based on an average match attendance of 13,750 rather than a regular capacity crowd is concerning. In addition to this, the survey conducted



of supporters as to how they would travel to the new stadium is not sufficient evidence to plan their strategy on.

- The applicant states that the proximity of this site to the Aberdeen Western Peripheral Route (AWPR) will alleviate many of the traffic concerns regarding this development. The Strategic Development Planning Authority (SDPA) expressed in their response to this application that **“The purpose of the AWPR is not to facilitate development, rather to alleviate traffic congestion in the greater Aberdeen area.”**
- The AWPR is likely to be far busier than expected, due to the fact that it was designed on models in 2008. Traffic is already far greater around Aberdeen than it was almost ten years ago now, and there are major concerns over many of the junctions, including Kingswells South. Our colleagues in Kingswells Community Council (KCC) have studied the figures surrounding the potential increase, and have included them in their response. WECC wish to note our support of the comments made by KCC in their submission.
- The A944 is a main arterial route for those in the West travelling to and from the City Centre, which is already a highly congested route. Upon completion of the AWPR, the A944 is the one road which is not expected to benefit. Any increase of traffic on this road will inevitably lead to major disruption on this and nearby routes. One major concern on match days would be the access of emergency service vehicles from Aberdeen to the West. In the application the Brodiach Road is proposed as an alternative route, leading through Westhill. To say the least, this narrow country road would be significantly inadequate for such purpose.
- Parking Standards limits the number of car parking in major developments such as this in order to achieve consistency in parking provision. In this case, 1333 spaces would be the maximum number allowed under current legislation. If further parking is desired then dispensation is required from the relevant authorities. This planning application proposes 1600 spaces, plus 600 offsite, which is significantly higher than that allowed under policy.
- The indication that offsite car parking would be required raises many concerns for WECC, as those utilising these car parks would then have to make their way on foot to the Kingsford site. This would require crossing the dual carriageway (A944), where although there is a pelican crossing in place, could not handle the potential of 1800 people (3 per car, as per AFC’s rules stated in planning application) crossing in a short space of time. There are serious concerns over pedestrian safety in this area, as it is not designed to handle such large numbers of pedestrians. Midweek games would be of even greater concern, as the timing of these games will be far closer to rush hour, and at the darkest time of the year. In addition to this, the sustainability of 600 offsite parking spaces must also be questioned, as ownership of these business car parks could easily change and result in the loss of parking provision.
- Even with 2200 car parking spaces, it must be noted that anyone travelling with less than 3 persons per car would not be entitled to access these. Therefore there would be numerous cars looking to park in the nearby vicinity, whether in Westhill or at the Kingswells Park and Ride. Both of these options carry great concerns again over safety, as the combined pedestrian and cycle way along the A944 is extremely narrow in places and could not cope with large numbers of people.



- Cars looking to park within Westhill would be of great inconvenience to local residents. We understand that a controlled parking zone (CPZ) would be implemented, where residents may have to apply for a permit to park on the street outside their home. Many houses already do not have sufficient parking, and this would lead to higher levels of policing required. There are a number of public car parks which fall within the proposed CPZ, meaning each of these could be overrun with fans parking to attend a match, leaving genuine members of the public unable to access the services they require. Local businesses are very likely to be detrimentally affected.
- The National Transport Strategy aims to reduce car usage in favour of walking, cycling or public transport, and this proposal is contrary to that. Access by foot or cycle ways would be extremely unsafe, and access by public transport may be difficult when the A944 (the only main access road) is extremely congested due to the high number of vehicles aiming to access the site.

**Overall, WECC believe that:**

- **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.**

## **Community facilities**

- Within our community there are many people who would appreciate new community facilities for different sports and activities in Westhill. However, despite the planning application stating that this application is for “Community and Sports Facilities”, the planning application tells of limited facilities for community use, primarily football orientated. **This application is for a football stadium, not a community stadium as outlined in the SDP.**
- The facilities designated for community use consist of two 3G pitches, and access to part of the community pavilion. Whilst these facilities could benefit those with an interest in football, there are also many questions regarding the usage of these facilities.
- It has been noted that football clubs within the area would be hoping to utilise these new pitches. With the Football Academy using the pitches early evening on weekdays and throughout the day at weekends, this leaves a small amount of time that other children and young people could access the facilities. If usage of facilities was primarily offered throughout the day, this minimises





opportunities for young people at school or in work to access these facilities. It is also unclear how use of these pitches would be charged, and how affordable these would be.

- Nothing else has been offered to the local community. The applicant has stated publicly that they requested suggestions from ourselves in WECC and also Kingswells Community Council regarding other community facilities. If AFC are serious about this being a community development, they would have included further facilities for other sports and activities.
- The application explains that part of the community utilisation of this development would be through the Aberdeen Football Club Community Trust (AFCCT). WECC acknowledge the great work done by the AFCCT throughout Aberdeen and Aberdeenshire. However, due to the majority of their work being outreach and in many different locations, we believe that they could be located anywhere. Perhaps they should be located nearer to the communities they are already very active in rather than moving miles away from the city centre.

**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.**

### **Economic Impact**

- Again, some members of our local community have expressed the opinion that this development would be of economic benefit to our local area. WECC have endeavoured to investigate the detail of this, before coming to a final perspective on this aspect of the application.
- WECC acknowledge the high number of jobs that could be created through the construction phase of this development. However, we are disappointed to see the number of jobs created long term far lower at around a net gain of approximately 30 part time or seasonal positions. We do not believe that these small benefits can outweigh the number of serious concerns and issues that this planning application raises, as outlined above in this document.
- In addition to this, the owners of our local shopping centre have submitted an objection to this application, noting their concerns regarding the significant departure from both the SDP and LDP's, believing that a development of this size should be planned for through these planning processes. In addition to this, they note that the proposals could "impact significantly on the locale", adding that further information regarding traffic and transportation would be required to alleviate their concerns.
- WECC have significant concerns over parking in the local area, as expressed earlier in this document. If public car parks such as that of the Westhill Shopping Centre are utilized by fans, this





leaves shoppers unable to park and access the local shops. This would undoubtedly have a significant impact on our local retailers and businesses in the area.

- It is not only Westhill which would lose out economically, but also the City Centre due to the relocation of fans travelling to matches. Currently, the majority of fans will come through the City Centre in some form, spending money in local businesses. This would all be lost if fans were to come directly to and from the stadium from the AWPR, then choosing to spend their money in the premises within the stadium. The City Centre Masterplan outlines the plans for the city centre, and this requires footfall of individual's spending money. We believe that relocating AFC out of the city centre would be detrimental to the city. The Strategic Development Planning authority noted that "No account appears to have been taken of either the fact that jobs will be transferring from one of the most economically disadvantaged parts of the City to a significantly more affluent one, or of pre and post-match revenue spent in the vicinity of Pittodrie or the wider city area – with very little opportunities for such expenditure in the vicinity of the application site."

**Overall, WECC believe that:**

- **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.**

## **Conclusion**

Westhill and Elrick Community Council have looked at this through the overall, long term effect that this development would have on the community that we live in. Whilst this proposal is on land within the boundary of Aberdeen City, it is an undoubtable fact that Westhill would be the community most affected by this development. We have spent many months listening to local residents who have attended our meetings or written to us expressing their thoughts on this application. We have acknowledged the potential benefits which some residents expressed to us, and would support development of community facilities within the boundary of Westhill especially if they were to be of easy access and affordable to use. However this is not the case with this proposal. There is a lack of clarity regarding community facilities in this development, and would not bring enough benefit to our local community to outweigh the serious planning concerns that we have with this application.

The fact that this proposal is on land which is Green belt, something which we believe should be protected, is our main reason for concern with this application. WECC would object to anything being built on this piece of land for this reason, as any building here would lead to coalescence of Westhill and Kingswells in addition to encouraging ribbon development along the A944. We have serious concerns regarding parking provision, and the ability of the local infrastructure to cope with such high levels of traffic. We feel strongly that development of this size would adversely impact the landscape setting, and would dominate the area in terms of the footprint and size of the stadium, but also the added issue of light and noise



pollution. We do not believe that the economic benefit to the North East of Scotland would be significant, and in fact WECC are concerned over the detrimental effect that this development would have on businesses both in the City Centre and also in Westhill itself.

Whilst WECC understand that AFC are in need of a new or improved football stadium, we do not believe that this site at Kingsford is appropriate for development. There are planning processes which identify and allocate land for development through both the Strategic and Local Development Plans. We believe that the two sites at Kings Links and Loirston would be far more appropriate for development, even if the stadium and training facilities were unable to be co-located.

We would like to put on record our gratitude to our colleagues in Kingswells Community Council with whom we have worked closely over many months now. Whilst our communities are very separate and have their own identities, there are many planning concerns which are pertinent to both. We wish to support their submission to this application, especially their figures regarding the traffic volumes at the Kingswells South AWPR junction.

It is for these reasons that Westhill and Elrick Community Council have come to the conclusion that we must object to this proposed development at Kingsford. Our objections are based on strong planning policy issues and facts, not on vague promises which may never come to pass. Our area could be left with serious long term implications if this application is granted permission. In doing so, we reserve the right to come back if there are any material changes proposed for this application by AFC. We appreciate being given discretionary consultee status by Aberdeen City Council and would be much obliged if we could be kept in the loop as this major application progresses.

**Becky Ferguson**

Secretary

On behalf of Westhill and Elrick Community Council

