

Planning Statement (Green Belt)

**PROPOSED COMMUNITY AND SPORTS FACILITIES,
FOOTBALL ACADEMY, (COMPRISING OUTDOOR
PITCHES, PAVILION AND ANCILLARY BUILDINGS),
STADIUM (20,000 CAPACITY) ANCILLARY USES,
FORMATION OF ACCESS ROADS, PARKING AND ALL
ASSOCIATED LANDSCAPING AND ENGINEERING WORKS**

**LAND AT KINGSFORD,
ABERDEEN**

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On behalf of
Aberdeen FC Community Trust
and Aberdeen Football Club Plc

Halliday Fraser Munro

Chartered Architects & Planning Consultants

Carden Church 6 Carden Place Aberdeen AB10 1UR
Tel: 01224 388700 Fax: 01224 388777

Aberdeen - Belfast - Dundee - Edinburgh - Leeds - London

e-mail: planning@hfm.co.uk

- 1.1 This Statement has been prepared by Halliday Fraser Munro on behalf of Aberdeen Football Club Plc and Aberdeen FC Community Trust (AFCCT) in support of an application for full planning permission for a phased development of new football and sports-related facilities at Kingsford, Aberdeen.
- 1.2 The proposed development is on land that is not presently allocated or zoned for development in the Aberdeen Local Development Plan 2012 (LDP). The site is designated 'Green Belt' in both the 2012 LDP and the forthcoming Local Development Plan 2016, anticipated to be adopted in early 2017.
- 1.3 The Aberdeen City and Shire Strategic Development Plan (March 2014) supports the delivery of a new stadium for Aberdeen City and Shire. At para 3.24 it states that 'two possible locations are shown for a new Community Stadium to support the growing sporting infrastructure of the city.' Schedule 2: The Proposals of the SDP also lists 'A new community stadium – a regionally important facility which will bring economic, social and cultural benefits.' The two potential locations are indicatively shown as Kings Links and Loirston.
- 1.4 The site's location within the Aberdeen Green Belt lends itself to assessment against the Local Development Plan (LDP) Policy NE2 (Green Belt). The LDP states that "The Green Belt directs planned growth to the most appropriate locations and supports regeneration" (paragraph 3.65). Policy NE2 states that 'No development will be permitted in the green belt for purposes other than those essential for agriculture, woodland and forestry, recreational uses compatible with an agricultural or natural setting, mineral extraction or landscape renewal.' The policy sets a general presumption against development within such areas; however there are exceptions to this, as follows:
- The development is within the boundary of the existing activity, is small-scale, the intensity of activity is not significantly increased, and any proposed built construction is ancillary to what exists;
 - Essential infrastructure, such as electronic communications infrastructure and electricity grid connections, transport proposals identified in the Local Development Plan, such as the Aberdeen Western Peripheral Route, as well as roads planned through the masterplanning of new housing and employment allocations, which cannot be accommodated other than in the green belt;

- Buildings in the green belt which have a historic or architectural interest or traditional character that contributes to the landscape setting of the city will be permitted to undergo a change of use to private residential use or to a use which makes a worthwhile contribution to the amenity of the green belt, providing it has been demonstrated that the building is no longer suitable for the purpose for which it was originally designed;
 - Proposals for extensions of existing buildings as part of a conversion or rehabilitation scheme will be permitted in the green belt provided: the original building remains visually dominant; the design of the extension is sympathetic to the original building in terms of massing, detailing and materials; and the siting of the extension relates well to the setting of the original building.
- 1.5 The only material change to Policy NE 2 through its incorporation into the Proposed LDP is an additional exception to 'one for one' replacement houses.
- 1.6 The development proposed at Kingsford does not directly meet any of the exemptions listed within the Green Belt Policy NE 2. The primary purpose of the proposed development however is for 'sports and recreation' use. The majority of the site area, therefore, will be sports pitches and car parking, with the proposed stadium representing the main 'developed' area of the site. Ancillary uses including retail, food and drink, staff offices and such like are also proposed, which are required in a sports stadium development of this scale. The landscape strategy of the Kingsford proposal is to keep the eastern half of the site (the community and training facilities) free from structures.
- 1.7 We believe that the proposed development can be accommodated in the Aberdeen Green Belt as a suitable Departure to Policy due to the nature of the proposals not undermining the Green Belt aims in addition to other material considerations.
- 1.8 Future development sites that are currently located in the Green Belt can be promoted for allocation in a forthcoming Aberdeen LDP through the Development Planning process. Should a bid be successful, this ultimately results in the land being removed from the Green Belt and allocated for development, thus negating the aforementioned Green Belt Policy. This can happen either in relation to a development bid being accepted, or by the zoning being altered to reflect a live planning permission or an application that has the support of the Council.

- 1.9 To date, the Kingsford site has not followed this process for the next Aberdeen LDP for reasons relating to timing of the Call for Sites process. Preparation of the 2017 LDP began in 2013. At this time, a separate site was being progressed for the development of a stadium at Loirston in the south of Aberdeen (see below). As such, that LDP could not have foreseen the submission of this planning application for the proposed development. The nature of the proposed development is uncommon both in scale and use, due to the requirement for only one training facility, football academy and stadium in Aberdeen and the north east. The forthcoming LDP could therefore not be expected to reasonably identify a suitable site for such development in the interests of the Development Management process, given that Kingsford was only identified as a suitable site midway through the preparation of the forthcoming LDP.
- 1.10 In summary, therefore, the application site is Green Belt at present and Policy NE 2 applies. This planning application (due to its scale and nature) is therefore considered a 'Significant Departure' to Policy NE 2 of the Aberdeen Local Development Plan 2012.
- 1.11 Section 25 and 37(2) of The Town and Country Planning (Scotland) Act 1997 states;
'Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.'
- 1.12 We believe that in the circumstances of the Kingsford proposals, there are material considerations that justify a departure from the LDP. These include:
- Kingsford benefits from its proximity to the AWPR Kingswells South Junction;
 - Other sites have been identified, reviewed and discounted;
 - It is highly likely that a site of the required scale to accommodate training facilities and a new stadium would include Green Belt land;
 - It was not possible to promote the site as an allocation through the LDP preparation process due to the timings involved;

- The proposed development will put Aberdeen City and Shire on the map as a location and centre for sporting excellence, complementing other successful facilities such as Aberdeen Sports Village;
- The proposed development will also :
 - create 400 gross additional PYE1 construction posts generating total one-off salaries of £10.2m and GVA of £21.4m;
 - create 20 net additional PYE construction posts generating total one-off salaries of £600,000 and GVA of £1.2m;
 - create 240 gross new on-site and off-site jobs – these equate to the actual number of direct positions created as a result of the development;
 - generate 30 net additional jobs with salaries of £0.3m per annum and GVA of £0.3m per annum – these equate to the actual impact of the development in the wider economy taking account of additionality factors (displacement, leakage and multipliers); and
 - generate net discounted additional salaries of £9m and £14m net additional GVA over a 25 year period at the Kingsford level.
- The development will also help to create access to employment opportunities for local people across a range of full and part time positions;
- The delivery of the stadium is in line with strategic planning documents such as the 2014 SDP.

1.13 The Development Management process does allow for such planning applications ('Significant Departures') to be duly considered by Planning Authorities. As required under The Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013, Aberdeen City Council's Scheme of Delegation sets out that such planning applications are determined by the Full Council with a subsequent Notification to Scottish Ministers.

1.14 With regards to applications which have already followed this process in Aberdeen, an application seeking Planning Permission in Principle for a hotel and country club (with circa 250 bedrooms, spa, swimming pool, function and conference facilities and restaurants) including holiday chalets, equestrian centre and country club house and associated car parking at Hazlehead Park in Aberdeen was submitted in 2014 (Reference: 141026). The application site is located in the Aberdeen Green Belt, and was not allocated for development of this kind, and thereby constituted a Significant Departure to the LDP Green Belt Policy of Aberdeen City Council. Nevertheless, the proposals were

recommended for Approval by the Planning Service, and approved at Full Council without Scottish Minister call-in. Although this development is not similar in nature to the proposed, one of the reasons Aberdeen City Council Planning Service showed a Willingness to Approve this application was a result of; *“the particular attributes of the proposed use and the site ... alternative uses on this site, for example, housing or offices, would not have the same specific locational requirements, synergy with the surroundings and surrounding uses, nor benefits for the city ... in terms of economic development or the social benefits of the proposed facilities”* (Committee Report, page 20). Furthermore, the proposed facilities were deemed to *“complement recreational uses that are appropriate within the Green Belt and does respond to an acknowledged need [and] a minor and localised impact on the character of the Green Belt in the immediate vicinity, but not on the wider Green Belt, nor on its purpose as described in Scottish Planning Policy and the LDP”* (Committee Report, page 28) and concluding that *“[the proposed development] would not unacceptably erode landscaped setting of the Green Belt when set against other material considerations in favour of the development”* (Committee Report, page 29).

- 1.15 A planning application for a 21,000 capacity sports & leisure stadium (including associated car parking, access arrangements & landscaping) was submitted by Aberdeen Football Club in 2010 on land near Loirston Loch (Application Reference: 101299) was also recommended for Approval as a Significant Departure to Policy. Since the progression of this application, the site was identified as ‘suitable’ for accommodating a Community Stadium in the 2010 Proposed Local Development Plan and the development has since been formally acknowledged in the current adopted LDP (2012) to that effect. As mentioned previously, the Call for Sites process for the forthcoming LDP commenced in 2013, at which time the proposals at Loirston were still being progressed through the Development Management process.
- 1.16 In the Planning Officer’s Report to Full Council for 101299, it was concluded that the proposals would be a suitable Departure to Policy as *“the proposal would provide a prestigious and regionally important, modern, high quality sports, leisure and community facility in Aberdeen, complementing the recently constructed Sports Village at Linkfield. It would bring significant long term benefits to the economy of Aberdeen, in particular through the potential to attract major events. SPP advises that planning authorities should proactively support sustainable economic growth and take a positive approach to development, recognising and responding to economic and financial conditions in considering proposals. It also places a clear focus on the quality of outcomes. In*

addition to the quality of the facilities within the stadium, the proposed development would also be an iconic landmark building at an important gateway to the City."

- 1.17 The planning application at Loirston was however withdrawn in July 2016 before the approval was issued. The site is no longer being suitable for the development originally proposed, due to the absence of adjacent training facilities at Calder Park as the City South Academy is under construction there.
- 1.18 The site selection process for the proposed development at Kingsford has been undertaken as a 'sequential assessment'. Site opportunities were assessed using the current and forthcoming LDPs, existing planning consents and land availability. This approach also considered the following: site size (i.e. amount of land required to accommodate all development); ease of access (including car parking, and access by foot, cycle and public transport); surrounding uses; ownership availability; financial viability; and potential constraints (physical, environmental, etc).
- 1.19 The 'sequential approach' was limited to sites within the Aberdeen City Council boundary due to the nature of the Applicant as the City's principal football team. In line with national planning guidance, the City Centre is the first location for the consideration of sites, then elsewhere in the City, and then the outskirts. Planning policy at all levels in Scotland promotes a general presumption in favour of 'brownfield' development. There are however no brownfield sites in Aberdeen City that are of a scale to accommodate the level of development proposed in this planning application. Therefore, the development requires to be located on greenfield land; the majority of which is contained on the outskirts of the city and is zoned as Green Belt. Other sites have been considered as part of this process. These are outlined and discussed in further detail within chapter 4 of the Environmental Statement and are:
- Pittodrie;
 - Kings Links;
 - Loirston;
 - Former AECC;
 - Proposed AECC;
 - Bellfield Farm;
 - Calder Park.

- 1.20 The site at Kingsford has therefore been carefully selected following consideration of alternative options in Aberdeen. Although the site will be used for less demanding sports and leisure purposes for the majority of the time (for example training exercises and Aberdeen FC Community Trust activities), the demands of match days are the primary consideration. Potential sites had to demonstrate the important properties listed above in order to accommodate the level of development that is proposed, particularly the volume of people travelling to the site on a match day. Aberdeen Football Club's current stadium is located close to the City Centre and so, the transportation of fans to a new location outside of the City Centre is one of the main considerations for the site and a location close to a main road is essential. The application site has been selected due to its good access from a main route into Aberdeen City (A944) and the Aberdeen Western Peripheral Road (AWPR) without the requirement of extensive road construction to a new site (which would consume an even greater area of land).
- 1.21 It is acknowledged that the proposals represent a Significant Departure from the LDP, however the site selection process demonstrates that the proposed stadium, training facilities and community facilities cannot be accommodated elsewhere within the City and the chosen site presents ample opportunity for transportation links from both the City Centre to the east and Aberdeenshire to the west via at A944, and elsewhere in Scotland via the AWPR connection at Kingswells. The abovementioned 'test' demonstrates that this location is the most suitable in terms of size, availability, accessibility, and proximity to the City.
- 1.22 Furthermore, the application site's previous use for landfill activity means that it should not be considered 'greenfield'. The location of the proposed development is therefore utilising an area of previously used land which is low in quality and semi-brownfield in nature.
- 1.23 A key role of Aberdeen City's Green Belt policy (Policy NE2) is to prevent the coalescence of settlements. Notwithstanding the application proposals, there is negligible threat of coalescence as a substantial area of Green Belt is still maintained north and south of the A944 between the western edge of the City and the Aberdeenshire settlement, Westhill despite this proposed development alongside a main transport route. Due weight should also be given to the other material considerations which outweigh the conflict with Green Belt Policy (the main reason for departure

from the LDP) which mainly comprise the socio-economic factors specified in other supporting documentation submitted with this application.

- 1.24 We respectfully request that Aberdeen City Council consider the points raised in this Statement, and other documents within this planning application, and support the proposed development as a suitable Significant Departure from Policy NE 2.