

# Public Document Pack



To: Councillor Henrickson , Chairperson; and Councillors Macdonald and Thomson .

Town House,  
ABERDEEN 01 February 2023

## **LOCAL REVIEW BODY OF ABERDEEN CITY COUNCIL**

The Members of the **LOCAL REVIEW BODY OF ABERDEEN CITY COUNCIL** are requested to meet in **Virtual - Remote Meeting** on **WEDNESDAY, 8 FEBRUARY 2023 at 10.00 am.**

JENNI LAWSON  
INTERIM CHIEF OFFICER - GOVERNANCE

**Members of the public can join the remote meeting to observe using the following link but must not participate, and must switch both your camera and microphone off. [Link to join Teams meetings.](#)**

### **B U S I N E S S**

1.1 Procedure Notice (Pages 5 - 6)

**COPIES OF THE RELEVANT PLANS / DRAWINGS ARE AVAILABLE FOR INSPECTION IN ADVANCE OF THE MEETING AND WILL BE DISPLAYED AT THE MEETING**

Link to the [Local Development Plan](#)

**TO REVIEW THE DECISION OF THE APPOINTED OFFICER TO REFUSE THE FOLLOWING APPLICATIONS**

### **PLANNING ADVISER - LUCY GREENE**

2.1 Detailed Planning Permission for the Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; associated works landscaping works; and installation of retractable bollards - Studio 3, 32 Albert Street Aberdeen

Members, please note that all plans and supporting documents relevant to the review can be viewed online [here](#) and by entering the application reference number 220432.

- 2.2 Delegated Report, Original Application Form, Decision Notice and Letters of Representation (Pages 7 - 34)
- 2.3 Planning Policies Referred to in Documents Submitted (Pages 35 - 36)
- 2.4 Notice of Review with Supporting Information Submitted by Applicant / Agent (Pages 37 - 44)
- 2.5 Determination - Reasons for Decision  
Members, please note that reasons should be based against Development Plan policies and any other material considerations.
- 2.6 Consideration of Conditions to be Attached to the Application - if Members are Minded to Over-Turn the Decision of the Case Officer

### **PLANNING ADVISER - LUCY GREENE**

- 3.1 Detailed Planning Permission for the formation of a surface car park - land off Dyce Avenue Dyce  
Members, please note that all plans and supporting documents relevant to the review can be viewed online [here](#) and by entering the application reference number 211759.
- 3.2 Delegated Report, Original Application Form, Decision Notice and Letters of Representation (Pages 45 - 154)
- 3.3 Planning Policies Referred to in Documents Submitted (Pages 155 - 156)
- 3.4 Notice of Review with Supporting Information Submitted by Applicant / Agent (Pages 157 - 198)
- 3.5 Determination - Reasons for Decision  
Members, please note that reasons should be based against Development Plan policies and any other material considerations.
- 3.6 Consideration of Conditions to be Attached to the Application - if Members are Minded to Over-Turn the Decision of the Case Officer

Website Address: [www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)

Should you require any further information about this agenda, please contact Lynsey McBain on [lymcbain@aberdeencity.gov.uk](mailto:lymcbain@aberdeencity.gov.uk) / tel 01224 522123

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## LOCAL REVIEW BODY OF ABERDEEN CITY COUNCIL

### PROCEDURE NOTE

#### GENERAL

1. The Local Review Body of Aberdeen City Council (the LRB) must at all times comply with (one) the provisions of the Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013 (the regulations), and (two) Aberdeen City Council's Standing Orders.
2. Local members are not permitted to sit on cases that fall within their ward.
3. In dealing with a request for the review of a decision made by an appointed officer under the Scheme of Delegation adopted by the Council for the determination of "local" planning applications, the LRB acknowledge that the review process as set out in the regulations shall be carried out in stages.
4. As the first stage and having considered the applicant's stated preference (if any) for the procedure to be followed, the LRB must decide how the case under review is to be determined.
5. Once a notice of review has been submitted interested parties (defined as statutory consultees or other parties who have made, and have not withdrawn, representations in connection with the application) will be consulted on the Notice and will have the right to make further representations within 14 days.  
Any representations:
  - made by any party other than the interested parties as defined above (including those objectors or Community Councils that did not make timeous representation on the application before its delegated determination by the appointed officer) or
  - made outwith the 14 day period representation period referred to abovecannot and will not be considered by the Local Review Body in determining the Review.
6. Where the LRB consider that the review documents (as defined within the regulations) provide sufficient information to enable them to determine the review, they may (as the next stage in the process) proceed to do so without further procedure.
7. Should the LRB, however, consider that they are not in a position to determine the review without further procedure, they must then decide which one of (or combination of) the further procedures available to them in terms of the regulations should be pursued. The further procedures available are:-
  - (a) written submissions;
  - (b) the holding of one or more hearing sessions;

- (c) an inspection of the site.
8. If the LRB do decide to seek further information or representations prior to the determination of the review, they will require, in addition to deciding the manner in which that further information/representations should be provided, to be specific about the nature of the information/representations sought and by whom it should be provided.
  9. In adjourning a meeting to such date and time as it may then or later decide, the LRB shall take into account the procedures outlined within Part 4 of the regulations, which will require to be fully observed.

#### DETERMINATION OF REVIEW

10. Once in possession of all information and/or representations considered necessary to the case before them, the LRB will proceed to determine the review.
11. The starting point for the determination of the review by the LRB will be Section 25 of the Town and Country Planning (Scotland) Act 1997, which provides that:-
  - “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.”
12. In coming to a decision on the review before them, the LRB will require:-
  - (a) to consider the Development Plan position relating to the application proposal and reach a view as to whether the proposal accords with the Development Plan;
  - (b) to identify all other material considerations arising (if any) which may be relevant to the proposal;
  - (c) to weigh the Development Plan position against the other material considerations arising before deciding whether the Development Plan should or should not prevail in the circumstances.
13. In determining the review, the LRB will:-
  - (a) uphold the appointed officers determination, with or without amendments or additions to the reason for refusal; or
  - (b) overturn the appointed officer’s decision and approve the application **with or without appropriate conditions.**
14. The LRB will give clear reasons for its decision.

 <p><b>ABERDEEN</b> CITY COUNCIL</p>	<h2 style="margin: 0;">Strategic Place Planning</h2> <hr/> <p style="margin: 0;">Report of Handling</p>
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<b>Site Address:</b>	Studio 3, 32 Albert Street, Aberdeen, AB25 1XR
<b>Application Description:</b>	Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; associated works landscaping works; and installation of retractable bollards
<b>Application Ref:</b>	220432/DPP
<b>Application Type:</b>	Detailed Planning Permission
<b>Application Date:</b>	8 April 2022
<b>Applicant:</b>	Carden Studios Ltd
<b>Ward:</b>	Hazlehead/Queen's Cross/Countesswells
<b>Community Council:</b>	Queen's Cross and Harlaw
<b>Case Officer:</b>	Aoife Murphy

### **RECOMMENDATION**

Refuse

### **APPLICATION BACKGROUND**

#### **Site Description**

The site is located to the west of Albert Street and to the rear of 6 Carden Place within the West End of Aberdeen and forms part of a category B listed building; formerly known as Melville Carden Church. This building consists of a granite gothic church with 2 tower façade and cruciform-plan. The church was designed by Robert Wilson of Ellis and Wilson in 1882. In 1990 the church was sensitively converted into offices. 32 Albert Street, the subject of this application, comprises the rear (northern) section of the building and has a separate entrance off Albert Street, although the buildings are linked by internal staircases. 32 Albert Street originally comprised the vestry, kitchen and session room serving the church, and was converted to offices along with the church.

Whilst also accommodating the building, the application site also encompasses an area of parking to the north, beyond which lies Albert Lane. The site lies within the West End Office Area as designated by the Aberdeen Local Development Plan 2017 and within the Albyn Place and Rubislaw Conservation Area.

#### **Relevant Planning History**

220433/LBC – Listed Building Consent for internal alterations to form 2 residential flats, associated works including alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; the installation of boundary enclosure; landscaping works; and raised arm barrier to car park - Pending Consideration.

## **APPLICATION DESCRIPTION**

### **Description of Proposal**

Detailed planning permission is sought for a change of use and conversion of an office building (Class 4) to form 2 residential flats (Sui Generis). This change would require some alterations to the building including the installation of replacement windows and doors and the formation of an entrance door from an existing window opening. Associated works are also proposed, such as the installation of boundary enclosure, landscaping works and installation of retractable bollards along the northern boundary.

The proposal would see the ground and first floor converted into two flats, one on each floor. Each flat would have 2 bedrooms, kitchen, lounge and shower rooms. Access to flat 1, located on the ground floor, would be obtained via a proposed access door on the west elevation, which would be formed by enlarging an existing window opening. While access to flat 2 at first floor level would be gained via an existing access door on the west elevation and internal staircase. The existing access located on the east elevation would be retained but internal alterations would mean that this would only provide access to the existing offices located within 6 Carden Place.

It is not proposed to make any significant changes to the external area bar the provision of a footpath immediately to the west and north of the building, two bin stances and cycle stores to be located along the western boundary and some soft landscaping wrapping around the building and continuing into a small part of the car park. While it does fall within the application boundary, the car park would be retained, minus two spaces, leaving 12 spaces which would be retained for the existing offices at 6 Carden Place. The access off Albert Lane would be retained, but it is proposed to install stainless steel retractable bollards along the opening.

Listed building consent is also sought and will consider both the external and internal works to this B listed building.

### **Amendments**

It was initially proposed to install a granite upstand with railings and an automatic raised arm barrier along the northern boundary, however stainless steel, retractable bollards are now proposed, but it should be noted that this change was not made at the request of the Planning Service. Amendments have also been made to the external amenity area, these have been at the request of the Planning Service and are discussed in detail below.

### **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=R9NFGVBZM5A00>

Heritage and Design Statement

Window Condition Survey

Heritage and Design Statement Rev A

Window Condition Survey Rev A

Supporting Statement – Response to Roads Development Management comments

Supporting Statement – Amenity provision

## **CONSULTATIONS**

**ACC - Environmental Health** – no observations or comments.



**ACC - Roads Development Management Team** – has advised it has no objection to the proposal, noting that no parking is proposed and that cycle storage and a bin collection point has been shown on the plans.

**ACC - Waste and Recycling** – has no objection, but provides details on the type of waste storage facilities required.

**Queen's Cross and Harlaw Community Council** – no comments received.

## **REPRESENTATIONS**

None

## **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.

Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 places a duty on planning authorities to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. While Section 64 of the same 1997 Act places a duty on planning authorities to preserve and enhance the character or appearance of conservation areas.

### **National Planning Policy and Guidance**

Scottish Planning Policy

Historic Environment Policy for Scotland

### **Aberdeen Local Development Plan 2017**

Section 16 (1)(a)(ii) of the Town and Country Planning (Scotland) Act 1997 requires that, where there is a current local development plan, a proposed local development plan must be submitted to Scottish Ministers within 5 years after the date on which the current plan was approved. From 21 January 2022, the extant local development plan will be beyond this 5-year period. The Proposed Aberdeen Local Development Plan 2020 has been submitted to the Planning & Environmental Appeals Division at the Scottish Government in July 2021. The formal examination in public of the Proposed Local Development Plan 2020 has commenced with reporters appointed. Material consideration will be given to the Proposed Local Development Plan 2020, in the context of the progress of its examination, in the assessment of planning applications.

Given the extant local development plan is beyond its five-year review period consideration, where relevant, weight should be given to paragraph 33 of the Scottish Planning Policy (2014) which states: "Where relevant policies in a development plan are out-of-date or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration.

The following policies are relevant –

Policy D1 - Quality Placemaking by Design

Policy D4 - Historic Environment

Policy D5 - Our Granite Heritage

Policy T2 - Managing the Transport Impact of Development

Policy T3 - Sustainable and Active Travel

Policy B3 - West End Office Area  
 Policy H1 - Residential Areas  
 Policy R6 - Waste Management Requirements for New Development  
 Policy CI1 - Digital Infrastructure

### **Supplementary Guidance (SG)**

Landscape SG  
 Transport and Accessibility SG  
 Resources for New Development SG  
 The Repair and Replacement of Windows and Doors SG

### **Proposed Aberdeen Local Development Plan 2020**

The Report of Examination on the Proposed Aberdeen Local Development Plan 2020 (PALDP) was received by the Council on 20 September 2022. The PALDP constitutes the Council's settled view as to the content of the final adopted ALDP and is now a material consideration in the determination of planning applications. The exact weight to be given to matters contained in the PALDP (including individual policies) in relation to specific applications will depend on whether –

- these matters have been subject to comment by the Reporter; and
- the relevance of these matters to the application under consideration.

The following re relevant to the assessment of this application:

Policy D1 - Quality Placemaking  
 Policy D2 - Amenity  
 Policy D6 - Historic Environment  
 Policy D7 - Our Granite Heritage  
 Policy D8 - Windows and Doors  
 Policy R5 - Waste Management Requirements from New Developments  
 Policy H1 - Residential Areas  
 Policy VC6 - West End Area  
 Policy T2 - Sustainable Transport  
 Policy T3 - Parking  
 Policy CI1 - Digital Infrastructure

### **Other Material Considerations**

Historic Environment Scotland's Managing Change Guidance: Windows, Doorways, Setting and Use and Adaption of Listed Buildings  
 Albyn Place and Rubislaw Conservation Area Character Appraisal

## **EVALUATION**

### **Principle of Development**

The proposal is for the conversion of an existing building to form two residential flats. This building and the office building to the south are Cat. B listed, under the one listing, and the site is located within the Albyn Place and Rubislaw Conservation Area. The previous use of the buildings was offices, which was and continues to be supported by the current zoning of the site, which is designated as West End Office Area. However, under Policy B3 - West End Office Area, it does state that an application for residential development will be considered on its own merits. As this policy does not have any criteria or guidelines for residential development that may be supported, the Planning Service must turn to the next relevant policy to undertake an adequate assessment. As such Policy H1 - Residential Areas is relevant to the extent that this sets the criteria for 'high quality' development, which respect the existing character and context of the area, such aspects are assessed below.

Within the Proposed Aberdeen Local Development Plan 2020, it is acknowledged that this area would be designated as West End Area, with development assessed against Policy VC6 - West End Area. The Proposed Plan promotes this area as a prestigious, high quality location on the edge of the city centre, but which is readily accessible by active travel and public transport. The area currently comprises a mix of uses and the Proposed Plan encourages and promotes the continued development of this area with a focus on a mix of uses including residential, with Policy VC6 stating that 'the principle of change of use from office to residential will be supported', but they must take into account existing uses and avoid undue conflict with adjacent land uses and amenity.

In light of the above, the Planning Service is satisfied that the principle of residential use in this area can be supported. The area zoned under Policy B3 has seen a rise in the number of offices lying vacant over recent times, initially as a result of the downturn in the oil industry, subsequently due to an increase in the availability of purpose-built office accommodation elsewhere in the city and most recently due to a change in office accommodation requirements and resulting demand following the Covid 19 pandemic. However, while the Planning Service can be supportive of residential use, that does not mean such a development will be allowed and, in this case, careful consideration must be given to the proposed layout of the site, as well as the amenity of the future occupants of the proposed flats and any potential impact on existing amenity. Additionally, what must be considered is whether the development would result in any impact on the listed building and its setting as well as the potential impact on the wider conservation area. These aspects will be considered in full below, with the proposal assessed against SPP, HEPS, Policy H1 - Residential Areas, Policy D1 - Quality Placemaking by Design, Policy D4 - Historic Environment and Policy D5 - Our Granite Heritage of the Aberdeen local Development Plan 2017 and the Managing Change Guidance on *Setting*.

### **Layout and Amenity**

In terms of the layout, it is acknowledged that there is no specific policies or guidance that advises an appropriate layout for a flat development, however Policy D1 - Quality Placemaking by Design does outline the six essential qualities, which aid the assessment of such proposals. Further to this, the Landscape SG states that "*Individual flats or houses shall be designed to make the most of any opportunities offered by the site to optimise views and sunlight*". However, in this case as the proposal seeks to re-use an existing building, located in the West End approximately 500m from the City Centre boundary and easily accessible to a range of facilities. While there are some constraints when re-using brownfield sites, which may limit levels of amenity for future occupants, such matters need to be given a careful consideration.

While there is no specific policy within the current Local Development Plan related to amenity, the Proposed Plan does now contain Policy D2 - Amenity. Amenity has an influence on the quality of life of individuals and communities and poor amenity can have detrimental impacts on health and wellbeing. Buildings must be fit for purpose and meet the needs of users and occupiers, with consideration given to neighbouring properties to ensure there are no unreasonable impacts on daylight, sunlight and outlook. Additionally, amenity spaces around buildings must be useable, have a degree of privacy and be designed to include a range of functions appropriate to the building use.

In terms of daylight, it is considered that from a plan view this is limited for both flats, owing to the fact that there are only small vertical windows serving the flats. However, having visited the site and undertaking an internal review, the Planning Service are comfortable that the level of daylight receipt for all rooms would be sufficient, owing to the height of the windows and the ceiling heights internally. The only exception would be the lounge and kitchen on the ground floor, given the location of the window. However, a new door with glazing and a fixed fan light is proposed for the enlarged opening on the west elevation which would allow for a satisfactory level of light for this room. Bearing in mind the constraints for these types of brownfield development, the fact that the

building is listed and ultimately constrained by that to some degree and the aim of Historic Environment Scotland's to ensure that such buildings have a long term future, the Planning Service need to be able to compromise on situations such as these. Having given this aspect of the proposal due consideration, the Planning Service are willing to compromise in this case given that the proposed units will be in receipt of adequate amenity in relation to daylight.

With regards to outlook, both units have windows on the west, north and east elevations and given the urban nature of area, the outlook for the upper floor unit, when looking to the west, north and east is considered to be sufficient to meet the requirements of both the Landscape SG and Policy D2. However, in relation to the outlook for the ground floor unit, to the west, this looks onto an existing boundary wall, to the north, the current view is one of the car park and to the east the view is onto the public footpath and road. This is not considered to be particularly attractive in terms of outlook, but it is appreciated that little can be done to the west and east owing to the site configuration and ultimately the physical constraints. In terms of outlook to the north, this will be given further consideration when looking at the proposal in respect of the external amenity space below.

With regards to amenity for the surrounding area, it is not considered that this development would result in any impact on existing levels of amenity.

Turning now to the external amenity space, several site plan revisions have been submitted to date showing amendments to the external amenity space. Initially it was proposed to remove two car parking spaces, increase the level of soft landscaping directly adjacent the building and incorporate a footpath providing access from the public footpath to the entrance doors on the north elevation. Several iterations of the proposed site plan have since been submitted showing ultimately the same proposal in slightly different forms. Concerns were highlighted by the Planning Service in relation to this area and fundamentally highlighted the lack of usable private garden space, the location of the path adjacent the north elevation, the lack of sufficient outlook to the north and ultimately the potential impact on privacy this may cause, especially considering that those who would use the office car park could gain direct access to this path. These concerns were highlighted to the applicant and it was suggested that a further two car parking spaces be removed to increase the level of garden ground and potentially provide areas of private garden ground for each flat. Furthermore, it was outlined that the footpath running along the north elevation be relocated further north and some form of boundary treatment incorporated to stop general access to and from the car park, thus ultimately improving outlook to the north specifically for the ground floor unit, but also for the unit on the upper floor.

The final site plan revision, to some extent, seeks to address the concerns highlighted with the footpath relocated slightly and a hedge now proposed to north. However, what has been done is not satisfactory nor does it provide sufficient external amenity space for future residents. Furthermore, the proposal to reduce the car parking by two further spaces, thus improving both amenity and outlook to the north, while still allowing sufficient parking for the office space was rejected with correspondence stating that "*removal of the car parking spaces will be detrimental to the rental viability of the office units*". The applicant was advised that 10 spaces was sufficient in terms of maximum car parking spaces outlined within the Supplementary Guidance and such changes would ultimately improve the quality of the development and the wellbeing of future residents. It is also noted that further parking spaces serving the existing office use are found to the south of the building frontage onto Carden Place.

Overall, it is considered that what is proposed is lacking in terms of external amenity space, which has a direct impact on the future residents of these units. It is considered that further, minor amendments to what is currently proposed would go a long way in improving the situation, but these have not been taken forward by the applicant. While a Supporting Statement relating to amenity provision was submitted in support of this application and it is acknowledged that there

are public spaces that could be utilised, such a compromise is normally only offered to city centre locations, where no external amenity space can be provided owing to the urban form. In this case, the Planning Service have highlighted several small amendments within the red line boundary that would ultimately improve the quality of the development.

Overall, while concerns existed initially with regards to daylight receipt, these have been satisfactorily addressed. However, what has not been shown is the ability to provide an appropriate layout of the external amenity space that allows for usable space for future occupants. Additionally, the lack of such a space directly impacts on the level of outlook, especially to the north due to the layout and character of the site, which cannot be accepted by the Planning Service in this instance. As a result, the proposal is not considered to be in compliance with Policy D1 - Quality Placemaking by Design of the current Aberdeen Local Development Plan, the associated Landscape SG or Policy D2 - Amenity of the Proposed Aberdeen Local Development Plan 2020.

### **Impact on Built Heritage**

As outlined above the site sits within the Albyn Place and Rubislaw Conservation Area, with the building itself being category B listed, as such a thorough assessment of the proposal against Policy D4 - Historic Environment is required. This policy advises the Council will protect, preserve and enhance the historic environment in line with national and local policies and guidance.

Scottish Planning Policy (SPP) advises that in relation to listed buildings where applications are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. In respect of conservation areas, SPP advises that proposals for development within conservation areas should preserve or enhance the character and appearance of the conservation area. Historic Environment Policy for Scotland (HEPS) outlines a number of policies which allow the Planning Service to manage the historic environment.

In respect of this application an assessment of potential impact on both the listed building and the conservation area will be undertaken. Turning first to the listed building, it is not considered that the proposed change of use would have any impact on the historic interest of the listed building its setting.

In terms of external works, it is proposed to replace the existing arched timber framed fixed windows with openable timber framed windows in order to address technical requirements for ventilation and thermal performance. The new windows will introduce openable sashes where required in place of the fixed glazing but would seek to match the original windows in the slim frame profile, placement of the case within the wall and a fitting method. The existing timber sash and case windows to rear elevation will be upgraded with double glazed units into existing frames. However, while timber windows are proposed, as noted on the submitted elevations, there is some ambiguity regarding the actual material as plans showing the replacement window details state Aluclad rather than timber. While this is easily resolved by updating the specific plan to show timber, given the issues with amenity as noted in the section above, it is not prudent to request these plans be updated. For the avoidance of doubt the installation of replacement timber windows is acceptable, the use of Alucad is not appropriate in this case and would not be supported given the historic importance of this building and its location within the conservation area. With regards to the Repair and Replacement of Windows and Doors Supplementary Guidance and the Managing Change Guidance: Windows, it is considered that the use of timber would meet the requirements highlighted in both documents, noting the errors on the submitted replacement window details.

In respect of the enlargement of the existing opening on the west elevation, this is considered to be in compliance with The Managing Change Guidance on Windows in that the works would be

undertaken on a subsidiary elevation, which is considered to be more suitable for work of this type. Additionally, the existing width of the window would be maintained and the opening expanded downwards to ground level. While this would result in the loss of some granite, owing to the extent of the work, this would be limited and overall acceptable given the above.

Turning now to the replacement rear door and the new door in the enlarged opening will be traditional two panel composite doors, top panel consisting of glazing, with fixed fan light above. In respect to the use of composite doors, the Planning Service can advise that this material is not appropriate for a B listed building. The Repair and Replacement of Windows and Doors Supplementary Guidance advises that in cases where replacement doors are proposed on listed buildings, timber will be the only material and no other material will be supported. Furthermore, the Managing Change Guidance on Doorways advises that *“any new replacement proposals must seek to improve the situation through designs and materials that are sympathetic to the character of the building”*. It is not considered that the use of composite doors would improve the existing situation. As such, the proposal fails to comply with the aforementioned guidance and ultimately Policy D4 - Historic Environment as the proposal does not preserve, protect or enhance the historic asset.

It is noted that all existing metal security bars will be removed. Overall, this proposal is considered to be appropriate and acceptable.

In respect of the works to provide external amenity space, it is not considered that these works, owing to their extent would detract from the setting of the listed building, especially considering the existing situation, however it is considered that the introduction of further soft landscaping would allow for an appropriate separation between the building from the existing car park, enhancing the appearance of the listed building in line with national and local policies.

Turning now to the conservation area, again it is not considered that the proposed change of use, the works to the existing window and door openings or formation would have any impact on or detract from the character of the conservation area owing to the nature of the works. With regards to the area of external amenity area, given the existing situation it is not considered that the works would detract from the character of area, however, as noted above, the introduction of further soft landscaping would allow for character to be enhanced.

In terms of the retractable bollards proposed along the northern boundary of the car park, overall, the Planning Service has no issue with this, although, it is considered the development could be enhanced by the installation of an appropriate boundary treatment. Such a treatment was requested by the way of railings to improve what was initially proposed, but such a proposal was not taken forward by the applicant and the northern boundary proposal fundamentally revised. Overall, the proposal for such a treatment does not adversely affect the character of the conservation area or the setting of the listed building.

In light of the above, noting the errors on the submitted plans, it is considered that aspects of the proposal are largely in compliance with the relevant policies and guidance, however, the proposal to use composite doors is not appropriate for a B listed building. As such, the works cannot be considered to comply with Policy D4 - Historic Environment, SPP and HEPS as well as the relevant guidance.

### **Access and Parking**

In terms of Policy T2 - Managing the Transport Impact of Development, Policy T3 - Sustainable and Active Travel and the Transport and Accessibility SG, the proposal has been fully considered against the relevant criteria.

Roads Development Management has assessed the proposal and in terms of parking notes that 1.5 spaces are required for residential unit, which in this case would equate to a provision of 3 spaces. In this instance, no parking is proposed with this application, however owing to the location of the development in relation to the city centre and its proximity to existing bus services as well as being accessible by other sustainable means of transport, the proposal is considered acceptable as a no car development.

In relation to the existing car parking and the proposed loss of 2 spaces, this has been considered by Roads Development Management, who is satisfied that the level of parking remaining is acceptable for the existing offices. Noting that further spaces could be removed in line with comments provided above.

Overall, both the Planning Service and Roads Development Management are satisfied with the proposal in terms of access and parking and therefore have no objections. As such, it is considered that the proposal complies with Policy T2, Policy T3 and the associated SG.

### **Other Technical Matters**

Policy R6 - Waste Management Requirements for New Development advises that all new development must provide sufficient space for waste including general, recyclable and compostable waste. In this instance, each property and associated curtilage will provide storage for the required facilities, with a bin presented to Albert Street for collection day. Overall, there are no objections to this aspect of the proposal and overall, the development is considered acceptable and in compliance with the aforementioned policy.

Policy CI1 - Digital Infrastructure requires all new residential and commercial development to have access to modern, up-to-date high-speed communications infrastructure. Given the sites location, it is considered that the building has acceptable level of access to communications infrastructure as such compliance with Policy CI1 can be achieved.

### **Proposed Aberdeen Local Development Plan**

The Report of Examination does not affect policies in a manner that is relevant to this application. The relevant PALDP policies substantively reiterate those in the adopted ALDP, apart from Policy D8 - Windows and Doors, however this aspect has been suitably considered above and therefore the proposal is acceptable in terms of both plans for the reasons previously given.

### **RECOMMENDATION**

Refuse

### **REASON FOR RECOMMENDATION**

While the principle of a residential use in this area could be deemed appropriate, the proposal overall cannot be accepted given the lack of an appropriate level of external amenity space, which is considered to inhibit the quality of the development as well as the wellbeing of future occupants. The proposal therefore fails to comply with Policy D1 - Quality Placemaking by Design of the current Aberdeen Local Development Plan, the associated Landscape SG and with Policy D2 - Amenity of the Proposed Aberdeen Local Development Plan 2020.

Furthermore, the use of composite doors on the west elevation does not seek to protect, preserve and enhance the historic importance of the B listed building. As such, the proposal fails to comply with Policy D4 - Historic Environment of the current Aberdeen Local Development Plan, Scottish Planning Policy and Historic Environment Policy for Scotland, as well as the relevant Repair and Replacement of Windows and Doors and Managing Change Guidance: Doorways.

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Marischal College Planning & Sustainable Development Business Hub 4, Ground Floor North Broad Street Aberdeen AB10 1AB Tel: 01224 523 470 Fax: 01224 636 181 Email: pi@aberdeencity.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100551130-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- Application for planning permission (including changes of use and surface mineral working).
- Application for planning permission in principle.
- Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

Conversion of Class 4 office building into 2 flats, including alterations and installation of replacement windows and doors and associated landscaping works. Installation of boundary enclosure and raised arm barrier to car park.

Is this a temporary permission? \*  Yes  No

If a change of use is to be included in the proposal has it already taken place?  
(Answer 'No' if there is no change of use.) \*  Yes  No

Has the work already been started and/or completed? \*

No  Yes – Started  Yes - Completed

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)  Applicant  Agent

## Agent Details

Please enter Agent details


Company/Organisation:	MGA Architecture		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	John	Building Name:	
Last Name: *	Buchan	Building Number:	22
Telephone Number: *	01224 643117	Address 1 (Street): *	Rubislaw Terrace
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Aberdeen
Fax Number:		Country: *	United Kingdom
		Postcode: *	AB10 1XE
Email Address: *	office@michaelgilmourassociates.co.uk		

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	
First Name: *		Building Number:	22
Last Name: *		Address 1 (Street): *	Rubislaw Terrace
Company/Organisation	Carden Studios Ltd	Address 2:	
Telephone Number: *		Town/City: *	Aberdeen
Extension Number:		Country: *	Scotland
Mobile Number:		Postcode: *	AB10 1XE
Fax Number:			
Email Address: *			

## Site Address Details

Planning Authority:

Aberdeen City Council

Full postal address of the site (including postcode where available):

Address 1:

STUDIO 3

Address 2:

32 ALBERT STREET

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

ABERDEEN

Post Code:

AB25 1XR

Please identify/describe the location of the site or sites

Northing

806078

Easting

392975

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*

Yes  No

## Pre-Application Discussion Details Cont.

In what format was the feedback given? \*

Meeting  Telephone  Letter  Email

Please provide a description of the feedback you were given and the name of the officer who provided this feedback. If a processing agreement [note 1] is currently in place or if you are currently discussing a processing agreement with the planning authority, please provide details of this. (This will help the authority to deal with this application more efficiently.) \* (max 500 characters)

A Pre-application Enquiry has been submitted to Aberdeen City Council for the proposed development and the response received indicated that the proposals would be acceptable in principle. A number of issues raised have been addressed in the amended proposals.

Title:

Ms

Other title:

First Name:

Aoife

Last Name:

Murphy

Correspondence Reference Number:

211672/PREAPP

Date (dd/mm/yyyy):

16/12/2021

Note 1. A Processing agreement involves setting out the key stages involved in determining a planning application, identifying what information is required and from whom and setting timescales for the delivery of various stages of the process.

## Site Area

Please state the site area:

461.00

Please state the measurement type used:

Hectares (ha)  Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

Class 4 offices

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

Yes  No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? \*

Yes  No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?

14

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? \*

12

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

## Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? \*

Yes  No

Do your proposals make provision for sustainable drainage of surface water?? \* (e.g. SUDS arrangements) \*

Yes  No

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? \*

Yes

No, using a private water supply

No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

## Assessment of Flood Risk

Is the site within an area of known risk of flooding? \*

Yes  No  Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? \*

Yes  No  Don't Know

## Trees

Are there any trees on or adjacent to the application site? \*

Yes  No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

## Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? \*

Yes  No

If Yes or No, please provide further details: \* (Max 500 characters)

Bin storage areas proposed to rear of the building. Kerbside collection

## Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? \*

Yes  No

How many units do you propose in total? \*

2

Please provide full details of the number and types of units on the plans. Additional information may be provided in a supporting statement.

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

Yes  No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013) \*

Yes  No  Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \*

Yes  No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \*  Yes  No

Is any of the land part of an agricultural holding? \*  Yes  No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate A

## Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Certificate A

I hereby certify that –

(1) - No person other than myself/the applicant was an owner (Any person who, in respect of any part of the land, is the owner or is the lessee under a lease thereof of which not less than 7 years remain unexpired.) of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding

Signed: John Buchan

On behalf of: Carden Studios Ltd

Date: 31/03/2022

Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

b) If this is an application for planning permission or planning permission in principal where there is a crown interest in the land, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

Yes  No  Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

Yes  No  Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

Yes  No  Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

Yes  No  Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

Site Layout Plan or Block plan.

Elevations.

Floor plans.

Cross sections.

Roof plan.

Master Plan/Framework Plan.

Landscape plan.

Photographs and/or photomontages.

Other.

If Other, please specify: \* (Max 500 characters)

Provide copies of the following documents if applicable:

A copy of an Environmental Statement. *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
A Design Statement or Design and Access Statement. *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A
A Flood Risk Assessment. *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
Drainage/SUDS layout. *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
A Transport Assessment or Travel Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
Contaminated Land Assessment. *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
Habitat Survey. *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A
A Processing Agreement. *	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A

Other Statements (please specify). (Max 500 characters)

Heritage statement

## **Declare – For Application to Planning Authority**

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr John Buchan

Declaration Date: 31/03/2022

## **Payment Details**

Online payment: ABSP00008126

Payment date: 31/03/2022 18:05:00

Created: 31/03/2022 18:05



## **DECISION NOTICE**

### **The Town and Country Planning (Scotland) Act 1997**

### **Detailed Planning Permission**

John Buchan  
MGA Architecture  
22 Rubislaw Terrace  
Aberdeen  
United Kingdom  
AB10 1XE

on behalf of **Carden Studios Ltd**

With reference to your application validly received on 8 April 2022 for the following development:-

**Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; associated works landscaping works; and installation of retractable bollards at Studio 3, 32 Albert Street**

Aberdeen City Council in exercise of their powers under the above mentioned Act hereby **REFUSE PLANNING PERMISSION** for the said development in accordance with the particulars given in the application form and the following plans and documents:

<b>Drawing Number</b>	<b>Drawing Type</b>
1413 - LOC01 A	Location Plan
1413 - 200 E	Site Layout (Proposed)
1413 - 202 D	Multiple Floor Plans (Proposed)
1413 - 204 B	Multiple Elevations (Proposed)
1413 - 205 B	North Elevation (Proposed)
1413 - 206 A	Replacement Window Details
1413 - 207	Entrance Door Details

## **DETAILS OF ANY VARIATION MADE TO THE ORIGINAL APPLICATION**

It was initially proposed to install a granite upstand with railings and an automatic raised arm barrier along the northern boundary, however stainless steel, retractable bollards are now proposed, but it should be noted that this change was not made at the request of the Planning Service. Amendments have also been made to the external amenity area, these have been at the request of the Planning Service.

## **REASON FOR DECISION**

The reasons on which the Council has based this decision are as follows:-

While the principle of a residential use in this area could be deemed appropriate, the proposal overall cannot be accepted given the lack of an appropriate level of external amenity space, which is considered to inhibit the quality of the development as well as the wellbeing of future occupants. The proposal therefore fails to comply with Policy D1 - Quality Placemaking by Design of the current Aberdeen Local Development Plan, the associated Landscape SG and with Policy D2 - Amenity of the Proposed Aberdeen Local Development Plan 2020.

Furthermore, the use of composite doors on the west elevation does not seek to protect, preserve and enhance the historic importance of the B listed building. As such, the proposal fails to comply with Policy D4 - Historic Environment of the current Aberdeen Local Development Plan, Scottish Planning Policy and Historic Environment Policy for Scotland, as well as the relevant Repair and Replacement of Windows and Doors and Managing Change Guidance: Doorways.

**Date of Signing** 30 September 2022



**Daniel Lewis**  
Development Management Manager

## **IMPORTANT INFORMATION RELATED TO THIS DECISION**

### **RIGHT OF APPEAL**

If the applicant is aggrieved by the decision of the planning authority –

- a) to refuse planning permission;
- b) to refuse approval, consent or agreement required by a condition imposed on a grant of planning permission;
- c) to grant planning permission or any approval, consent or agreement subject to conditions,

the applicant may require the planning authority to review the case under section 43A(8) of the Town and Country Planning (Scotland) Act 1997 within three months from the date of this notice. Any requests for a review must be made on a 'Notice of Review' form available from the planning authority or at [www.eplanning.scot](http://www.eplanning.scot).

Notices of review submitted by post should be sent to Strategic Place Planning (address at the top of this decision notice).

### **SERVICE OF PURCHASE NOTICE WHERE INTERESTS ARE AFFECTED BY A PLANNING DECISION**

If permission to develop land is refused and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development that would be permitted, the owners of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land in accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

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# **Consultee Comments for Planning Application 220432/DPP**

## **Application Summary**

Application Number: 220432/DPP

Address: Studio 3 32 Albert Street Aberdeen AB25 1XR

Proposal: Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; and associated works including the installation of boundary enclosure, landscaping works and raised arm barrier to car park

Case Officer: Aoife Murphy

## **Consultee Details**

Name: Mr Mark Nicholl

Address: Aberdeen City Council, Marischal College, Broad Street, Aberdeen AB10 1AB

Email: Not Available

On Behalf Of: ACC - Environmental Health

## **Comments**

No observations.

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# Consultee Comments for Planning Application 220432/DPP

## Application Summary

Application Number: 220432/DPP

Address: Studio 3 32 Albert Street Aberdeen AB25 1XR

Proposal: Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; and associated works including the installation of boundary enclosure, landscaping works and raised arm barrier to car park

Case Officer: Aoife Murphy

## Consultee Details

Name: Mr Jack Penman

Address: Aberdeen City Council, Marischal College, Broad Street, Aberdeen AB10 1AB

Email: Not Available

On Behalf Of: ACC - Roads Development Management Team

## Comments

I note that this application is for the conversion of Class 4 office building into 2 flats, including alterations and installation of replacement windows and doors and associated landscaping works. Additionally for the installation of boundary enclosure and raised arm barrier to car park at property Studio 3, 32 Albert Street, Aberdeen, AB25 1XR.

The proposal is located in the inner-city boundary and is located in Controlled Parking Zone (CPZ) L. Properties in CPZ L are entitled to two permits, in which one must be fixed (i.e. be vehicle specific) and the other can be fixed or flexible which can be used on any vehicle.

The proposal is 2 x 2-bedroom flats. The total GFA is 461m<sup>2</sup>. This GFA of class 4 offices in the inner city would require 1 space per 50m<sup>2</sup> equating to a maximum of 9 spaces being required. For flats in the inner-city 1.5 spaces are required for each dwelling, totalling 3 spaces required. It is noted from the application that there is currently 14 spaces and the proposal will reduce this to 12. It is noted in drawing 1413 - 200 A that the parking is retained for offices. Whilst the reduction of parking for the offices is acceptable, It is unclear if any parking is being provided solely for the flats and clarification on this is sought. If the parking is shared with offices how will this be managed? Or if no parking is being provided for the flats how does the applicant intend to address this shortfall of 3 spaces?

Parking bays should generally be 2.5m x 5m with a 6m aisle width between bays. The minimum acceptable size of a parking bay is 2.4m x 4.8m with a 6m aisle width. It is noted that owing to a planter extending into two spaces it does not appear all the spaces meet this criteria. However as this is an existing feature, we reluctantly accept this shortfall.

It is noted that the proposal includes an automatic raise arm barrier. Clarification on how this will operate is sought. Will it open for any passing vehicle? Is it controlled by fob/keypad? Can the applicant justify the need for the barrier as it appears the site has never had one in place before?

The proposed location for the bin storage is suitable in that it is well within 30 metres of the proposed property entrances. It is assumed from the drawing that the bin types are the standard wheelie bins in which case I would note each property would be liable to receive three bins: general waste, mixed recycling and food/garden waste. Clarification on this point is required. I would also query how the waste collection vehicles would be able to get to within 25m of the storage point for collection. Guidance on the types of bin and the preferred location for collection should be discussed with colleagues in Waste Management. If the bins are to be placed on Albert Street for collection by the residents this will require them to be taken up one step from the car park, which is acceptable for waste containers up to 250 litres (maximum permitted 3 steps). Clarification on the bin collection locations should be provided.

It is noted the proposal is well served by public transport with regularly serviced stops being within 100 metres. The site is also served by adequate public footways and is approximately 600 metres from Union Street, Aberdeen main thoroughfare and all the amenities located there.

It is noted that there is currently no provision for cycle storage / parking. A minimum of one cycle parking space per property is required and these should be located in a safe, convenient, accessible and prominent position. This will need to be addressed.

Upon receipt of the requested information I will be in a position to provide further/final Roads response.



# Aberdeen City Council – Development Management Team Consultation Request

<b>Case Officer:</b> Aoife Murphy	<b>To:</b> ACC - Waste And Recycling
<b>E-mail:</b> AMurphy@aberdeencity.gov.uk	<b>Date Sent:</b> 11 April 2022
<b>Tel.:</b> 01224 522156	<b>Respond by:</b> 2 May 2022

<b>Application Type:</b> Detailed Planning Permission
<b>Application Address:</b> Studio 3 32 Albert Street Aberdeen AB25 1XR
<b>Proposal Description:</b> Change of use and conversion of class 4 office building to form 2 residential flats, including alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; and associated works including the installation of boundary enclosure, landscaping works and raised arm barrier to car park
<b>Application Reference:</b> 220432/DPP
<b>Consultation Reference:</b> DC/ACC/RA66TOBZ03803

To view the plans and supporting documentation associated with the application please [follow this link](#).

In the case of pre-application enquires please login at <https://publicaccess.aberdeencity.gov.uk> and in 'Consultation Search' enter the consultation reference (shown above) into the 'Letter Reference' field and then click 'Search'.

Unless agreed with the case officer, should no response be received by the respond by date specified above it will be assumed your service has no comments to make.

Should further information be required, please let the case officer know as soon as possible in order for the information to be requested to allow timeous determination of the application.

## Response

Please select one of the following.

No observations/comments.	
Would make the following comments (please specify below).	
Would recommend the following conditions are included with any grant of consent.	<b>Y</b>
Would recommend the following comments are taken into consideration in the determination of the application.	
Object to the application (please specify reasons below).	

## COMMENTS

Waste Services response regarding application **220432 Studio 3**

As I understand, the development will consist of the 2 residential apartments.

I have consulted with colleagues across the waste operations team. I can confirm that Aberdeen City Council intend to provide the following services upon building completion.

Please note the information provided below by Waste Services is independent of the outcome of the planning application, which is being determined by the planning authority.

Each bin store will be provided with:

- 1 x 180 litre wheeled bin for general waste
- 1 x 240 litre co-mingled recycling bin for recycling
- 1 x 240litre wheeled bin for food waste

The following costs will be charged to the developer:

- Each 180l or 240l bin cost £35.00 each
- Caddy & Liners FOC
- Delivery fee for any order of less than 10 bins £30.00

It is pertinent to note that these services will be provided taking account of the following:

General points

- Will require a hardstanding area for bins to be positioned on in bin area.
- All the waste containers must be presented the kerbside of Albert Street only the collection day and must be removed from the kerbside as soon as possible. No containers should be permanently stored on the kerbside.
- No excess should be stored out with the containment provided. Information for extra waste uplift is available to residents at either [www.aberdeencity.gov.uk/wasteaware](http://www.aberdeencity.gov.uk/wasteaware) or by phoning 03000 200 292.
- Further information can be found in the Waste Supplementary Guidance available at: <https://www.aberdeencity.gov.uk/sites/default/files/2020-07/7.1.PolicySG.ResourcesForNewDevelopmentUpdateJuly2020.pdf>

Developers must contact Aberdeen City Council a minimum of ONE month before properties will be occupied. Bins MUST be on site prior to residents moving into properties. A Purchase Order should be raised with Aberdeen City Council using the above details and we will provide further guidance for purchasing the bins.

Responding Officer: L Todd

Date: 12/04/2022

Email: [wasteplanning@aberdeencity.gov.uk](mailto:wasteplanning@aberdeencity.gov.uk)

## Application 220432/DPP

### Aberdeen Local Development Plan (ALDP) 2017

- Policy D1 - Quality Placemaking by Design
- Policy D4 - Historic Environment
- Policy D5 - Our Granite Heritage
- Policy T2 - Managing the Transport Impact of Development
- Policy T3 - Sustainable and Active Travel
- Application Reference: 220432/DPP Page 4 of 9
- Policy B3 - West End Office Area
- Policy H1 - Residential Areas
- Policy R6 - Waste Management Requirements for New Development
- Policy C11 - Digital Infrastructure

[https://www.aberdeencity.gov.uk/sites/default/files/LDP\\_WS\\_20170328.pdf](https://www.aberdeencity.gov.uk/sites/default/files/LDP_WS_20170328.pdf)

### Proposed Aberdeen Local Development Plan (2020) / Aberdeen Local Development Plan 2022

- Policy D1 - Quality Placemaking
- Policy D2 - Amenity
- Policy D6 - Historic Environment
- Policy D7 - Our Granite Heritage
- Policy D8 - Windows and Doors
- Policy R5 - Waste Management Requirements from New Developments
- Policy H1 - Residential Areas
- Policy VC6 - West End Area
- Policy T2 - Sustainable Transport
- Policy T3 - Parking
- Policy C11 - Digital Infrastructure

<https://www.aberdeencity.gov.uk/services/planning-and-building/local-development-plan/aberdeen-local-development-plan/aberdeen-local-development-plan-review#3678>

### Supplementary Guidance

Landscape SG

Resources for New Development SG

The Repair and Replacement of Windows and Doors SG

Transport and Accessibility

[Supplementary guidance and technical advice | Aberdeen City Council](#)

## **Other Material Considerations**

Scottish Planning Policy 2020

[Scottish Planning Policy - gov.scot \(www.gov.scot\)](http://www.gov.scot)

Revised Draft NPF4 - National Planning Framework

[Supporting documents - National Planning Framework 4: revised draft - gov.scot \(www.gov.scot\)](http://www.gov.scot)

Historic Environment Policy for Scotland

[Historic Environment Policy for Scotland | Historic Environment Scotland](#)

Historic Environment Scotland's Managing Change Guidance: Windows, Doorways, Setting and Use and Adaption of Listed Buildings

[Managing Change in the Historic Environment Guidance Notes | HES](#)

Albyn Place and Rubislaw Conservation Area Character Appraisal

[Conservation areas | Aberdeen City Council](#)



Marischal College Planning & Sustainable Development Business Hub 4, Ground Floor North Broad Street Aberdeen AB10 1AB Tel: 01224 523 470 Fax: 01224 636 181 Email: pi@aberdeencity.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE      100551130-011

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

≤ Applicant   **T** Agent

## Agent Details

Please enter Agent details

Company/Organisation:	<input type="text" value="MGA Architecture"/>		
Ref. Number:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
First Name: *	<input type="text" value="John"/>	Building Name:	<input type="text"/>
Last Name: *	<input type="text" value="Buchan"/>	Building Number:	<input type="text" value="22"/>
Telephone Number: *	<input type="text" value="01224 643117"/>	Address 1 (Street): *	<input type="text" value="Rubislaw Terrace"/>
Extension Number:	<input type="text"/>	Address 2:	<input type="text"/>
Mobile Number:	<input type="text"/>	Town/City: *	<input type="text" value="Aberdeen"/>
Fax Number:	<input type="text"/>	Country: *	<input type="text" value="United Kingdom"/>
		Postcode: *	<input type="text" value="AB10 1XE"/>
Email Address: *	<input type="text" value="office@michaelgilmourassociates.co.uk"/>		

Is the applicant an individual or an organisation/corporate entity? \*

≤ Individual   **T** Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text"/>
First Name: *	<input type="text"/>	Building Number:	<input type="text" value="22"/>
Last Name: *	<input type="text"/>	Address 1 (Street): *	<input type="text" value="Rubislaw Terrace"/>
Company/Organisation	<input type="text" value="Carden Studios Ltd"/>	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	<input type="text" value="Aberdeen"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="Scotland"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="AB10 1XE"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="[REDACTED]"/>		

## Site Address Details

Planning Authority:	<input type="text" value="Aberdeen City Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="STUDIO 3"/>
Address 2:	<input type="text" value="32 ALBERT STREET"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="ABERDEEN"/>
Post Code:	<input type="text" value="AB25 1XR"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="806078"/>	Easting	<input type="text" value="392975"/>
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## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

Full Planning Permission for Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; and associated works including the installation of boundary enclosure, landscaping works and raised arm barrier to car park at Studio 3, 32 Albert Street, Aberdeen AB25 1XR

## Type of Application

What type of application did you submit to the planning authority? \*

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? \*

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Statement of Appeal is included with supporting documents.

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

Yes  No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)

We had insufficient time to fully engage with the planning department on the matter of lease agreements as we raised it on the 29th September (email correspondence included in the submission), in effect the same date when the application was refused.

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

Email correspondence with planning officer New lease Lower Ground Floor (Agreed) Carden Studios lease 1413-LA01-Response to Roads comments 1413-LA02-Amenity provision 1413-LA03-LRB Statement 1413\_200\_e\_Existing and proposed site 1413\_202\_d\_Proposed Floorplans 1413\_204\_b\_Prop East&West elevation 1413\_205\_b\_Prop North elevation 1413\_206\_a\_Replacement window details 1413\_207\_-\_Entrance door details 1413\_Heritage and Design Statement\_c 1413 LBC-Window Condition Survey a

## Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

220432/DPP

What date was the application submitted to the planning authority? \*

31/03/2022

What date was the decision issued by the planning authority? \*

30/09/2022

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

Yes  No

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

Yes  No

Is it possible for the site to be accessed safely and without barriers to entry? \*

Yes  No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

Yes  No

Have you provided the date and reference number of the application which is the subject of this review? \*

Yes  No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

Yes  No  N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

Yes  No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

Yes  No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.



## **Declare – Notice of Review**

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr John Buchan

Declaration Date: 21/12/2022

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21<sup>st</sup> December 2022

## NOTICE OF REVIEW

**Full Planning Permission for Change of use and conversion of class 4 office building to form 2 residential flats, alterations and installation of replacement windows and doors; formation of entrance door from an existing window opening; and associated works including the installation of boundary enclosure, landscaping works and raised arm barrier to car park at Studio 3, 32 Albert Street, Aberdeen AB25 1XR**

**Planning Reference: 220432/DPP**

## STATEMENT

We are seeking a review of the above planning application refused by the appointed officer. As required we provide this statement setting out the following reasons for seeking the review and matters we consider require to be taken into account in determining the review:

01. We were given insufficient time to respond to late request that we include 2No carpark spaces as additional amenity space to the proposed development.
02. We were unable to accede to the request as the carpark spaces were part of the lease to Arria, the tenant of the upper part of the open plan office space. Also the carpark spaces were part of an ongoing negotiation with a then potential tenant for the lower part of the open plan offices which is now subject to legal agreement.
03. We do not think that the requested amount of amenity space is necessary for this development.
04. We were not given any opportunity and time to respond to the refusal of the flat entrance door proposed specification.

## Background

The Vestry to the rear of previous Carden Melville Church was part of the original office conversion which commenced in 1990, following the Church of Scotland's decision to sell the building due to falling congregation numbers and consolidation of Parishes within the west end of Aberdeen.

The open plan nature of the Sanctuary and Games Hall below provides for flexible modern offices which together with the adjoining grounds helps secure a sustainable future for the grade B listed granite building with its impressive spire. This part of the building has been in constant occupation since 1991 and although currently only partly occupied the lower part of the building (previously Games Hall) is "under offer" with likely occupation March/April 2023.

The Vestry unfortunately has not fared so well and although part of a larger lease including the main lower ground floor, has not been occupied for at least ten years. The Vestry was originally designed to provide ancillary accommodation for the Church and was once a flat on the ground floor for the caretaker prior to the sale in 1990. It is not good for any building to be vacant for such a long period of time and in the absence of any interest for office use, it clearly needs an alternative use to generate interest and secure a sustainable future for the building.

Its location in the west end of Aberdeen, next to a bus stop, shops and amenities within a 5 minute walk, together with the cellular nature of the space and multiple aspect created by the original fenestration naturally lends itself to conversion to residential use.

The Planning Application for change of use and conversion of class 4 office building to form 2 residential flats was submitted in March 2022 and refused on 30<sup>th</sup> September 2022, stating two reasons for refusal: lack of amenity space and unacceptable entrance door specification.

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22 Rubislaw Terrace, Aberdeen, AB10 1XE - 01224 643117 - office@m-g-a.co.uk - www.m-g-a.co.uk

## **Reasons for seeking a Review 01:**

Following submission of the Planning Application, we entered into discussions with the Planning Dept to demonstrate that there was external amenity space to accompany the conversion to residential use. We have engaged with the planning officer and addressed their many comments including giving up a part of the parking to create additional garden ground and re-designing the amenity areas several times.

After 3 months of discussions the Planning Dept suddenly insisted that we sacrifice two more carpark spaces to provide additional amenity space. As evident from the email trail submitted in support of this application, the request came through on the 13 September 2022, we responded on the 15 September and following that there was no communication until 29<sup>th</sup> September when the planning officer wrote to us advising that the planning application would be refused, without any reference to the points we raised on the 15<sup>th</sup>. At this point it was too late to enter into any further discussions as the application was subsequently refused the next day.

## **Reasons for seeking a Review 02:**

The car park to the rear is required for parking to the main offices and in part is subject to a 10 year lease.

The remaining spaces are included in Head of Terms for the lower floor open plan offices and will be included in a lease currently being completed for entry in March/ April 2023. Please refer to the Lease Agreements copies supporting this submission.

As it stands, it would not be possible to give up more car park spaces to provide additional amenity.

## **Reasons for seeking a Review 03:**

We believe that the proposed amenity provision should be acceptable considering the type of the proposed properties and the surrounding urban context with easy access to public amenities, viability of the continuous use of the listed building and requirement for housing.

Refer to the letter of justification submitted as part of the planning application supporting documents, and included with this submission.

## **Reasons for seeking a Review 04:**

The decision notice stated a second reason for refusal as non-compliance of the proposed doors with relevant planning policies. There were no comments received from the planning service to indicate that this was the case during the application processing, therefore we were not given the opportunity and time to address this issue.


## **Conclusion**

We would ask the Local Review Body to take the supporting statement above into account and reconsider Planning Department's decision to refuse the planning permission.

Yours sincerely,

**Olga Druhakova**

MGA ARCHITECTURE

 <p><b>ABERDEEN</b> CITY COUNCIL</p>	<h2 style="margin: 0;">Strategic Place Planning</h2>
	<p>Report of Handling</p>

<b>Site Address:</b>	Land off Dyce Avenue, Aberdeen, AB21 0BH
<b>Application Description:</b>	Formation of a surface car park
<b>Application Ref:</b>	211759/DPP
<b>Application Type:</b>	Detailed Planning Permission
<b>Application Date:</b>	14 December 2021
<b>Applicant:</b>	The Hub (NW) Limited
<b>Ward:</b>	Dyce/Bucksburn/Danestone
<b>Community Council:</b>	Dyce and Stoneywood
<b>Case Officer:</b>	Matthew Easton

### **RECOMMENDATION**

Refuse

### **APPLICATION BACKGROUND**

#### **Site Description**

The application relates to an area of vacant ground within what is known as Aberdeen Business Park, forming part of the wider Kirkhill Industrial Estate and other business and industrial land surrounding Aberdeen International Airport.

The site extends to 0.69 hectares and comprises scrub, tall ruderal species and areas of rough grass. It is surrounded by built development, with the airport staff car park and small industrial units to the east (both accessed from Argyll Close); a warehouse to the south (accessed from Dyce Avenue); a car park to the west associated with an industrial use located on the opposite side of Thistle Road; and to the north by other business units set within landscaping, accessed from Thistle Road. There is an electricity substation immediately to the north and a telecommunications mast to the east.

There is an informal and unmade footpath which crosses the southern part of the site from east to west, connecting the Jury's Inn Hotel car park and Dyce Avenue.

#### **Relevant Planning History**

None

## **APPLICATION DESCRIPTION**

### **Description of Proposal**

Detailed planning permission is sought for the construction of a 274-space car park. It is intended that it would serve both airport passengers as well as workers from the surrounding business and industrial uses within Kirkhill.

The car park would be finished in a hard surface and have areas of landscaping around its edges. Access and egress would be via a new junction onto the turning circle at the eastern end of Dyce Avenue. Drainage trenches would be provided in-between the car parking spaces, and a swale, to provide SuDS to deal with surface water discharge. Security measures including barriers, CCTV cameras, ANPR (Automatic Number Plate Recognition) cameras and fencing are proposed, but at this stage no details of these aspects have been provided.

Of the 274 parking spaces, 70 spaces would be for electric vehicle charging, 18 of which would be installed with charging equipment and 42 of which would have cabling so that equipment can be installed at a future date. A further 12 spaces would be allocated for disabled users.

### **Amendments**

In agreement with the applicant, the following amendments were made to the application:

- Car park now intended for general use, rather than airport passengers only.
- Site boundary reduced to remove land adjacent to Thistle Road, which is outwith the applicant's ownership.
- Pedestrian access to Thistle Road removed.
- Number of electric vehicle charging spaces increased.

### **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=R43TDOBZIX000>

- Drainage Assessment
- Operational Strategy Statement
- Planning Statement
- Preliminary Ecological Appraisal
- Transport Statement

## **CONSULTATIONS**

**ACC - Roads Development Management Team** – Object to the application.

The site is located in the outer city (in terms of parking standards) and not within an area with any form of controlled parking measures.

Following discussions with the Council's Transport Strategy Team and regional transport partnership (Nestrans), it is considered that the proposal is contrary to Council policies in reducing private vehicular trips and undermines the viability of alternative sustainable transportation.

Additionally, Scottish Government published its updated Climate Change Delivery Plan for a green recovery post COVID-19, which includes a commitment to reduce car kilometres by 20% by 2030. Travel to the airport by sustainable methods would certainly benefit this aim.

The applicant has attempted to provide justification which indicates that there is a requirement for further related airport associated parking, however it is considered that there is already sufficient long-term parking around the Dyce area. Additionally, while it is noted that one car park located on Wellheads Drive is being utilised as a government COVID-19 testing centre, this shall eventually revert back to a long stay 'Park and Depart' car park serving the airport.

It is noted the vehicular access to the site would be via Dyce Avenue which is confirmed to already be designed to ACC standards. Therefore, there would be no requirement for a Section 56 Roads Construction Consent (RCC), but if there was proposed to be any alterations then this would be required.

**Aberdeen International Airport (Safeguarding Manager)** – No objection. The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria.

**Dyce And Stoneywood Community Council** – No response.

## **REPRESENTATIONS**

Five representations have been received (four objections, and one neutral). The representations have been submitted by a member of the public; two nearby businesses; the owner and operator of the airport; and owners of the Cairn Industrial Park in Dyce, which previously operated as an airport car park. The matters raised can be summarised as follows –

1. The application conflicts with the requirements of SPP as it is based on unsustainable patterns of airport related travel and has not been developed in co-ordination with any of the relevant organisations or through any of the relevant policy documents. Parking for the private car should not be encouraged as it encourages additional vehicles on the road. It does not accord with policies T2 or T3 of the ALDP.
2. There is no practical pedestrian route between the car park and airport, which would result in a 1.5km walk or could result in pedestrians taking informal shortcuts over adjoining private land.
3. Electric vehicle could be retrofitted to existing car park rather than creating new parking for the purpose.
4. The airport park and depart car park is not closed, rather being used as a Covid-19 test centre (*at the time of submission*).
5. The proposed development does not form part of the Airport Masterplan and does not contribute to achieving sustainable growth or modal shift. The Airport Masterplan includes provisions for additional car parking capacity to be achieved in a sustainable manner as part of a co-ordinated approach to surface access. There is no policy justification for future airport growth to be accompanied by the 'predict and provide' approach to car parking advocated by the proposal.
6. The proposed development of an 'airport car park' does not fall within the descriptions of business or employment uses and it does not protect or improve access. The application

fails to identify any beneficial employment or economic impacts. The proposed use will not enhance the attraction of the area and conflicts with sustainability objectives. It is respectfully suggested that the proposed development is therefore contrary to Policy B1 and related SDP provisions.

7. Permitting the proposed development would compromise the ability to minimise traffic generated by the airport and makes no contribution to encouraging more sustainable travel choices. The application has proposed pedestrian facilities that are not deliverable and has not provided any evidence as to how opportunities for sustainable and active travel have been maximized.
8. A Low Emissions Zone should be setup for all vehicles parking at the airport.
9. Car parked at the airport could be used in trials associated with battery storage.
10. The proposed shuttle bus service to the airport is unlikely to be commercially viable for the size of the car park.
11. The applicant's supporting information does not take account of the available airport parking capacity (1,400 spaces) at Cairn Industrial Park, which is about to re-commence operations shortly.
12. Traffic associated with the car park would conflict with overflow parking which already takes place on Dyce Avenue, making access to premises on the street difficult.

## **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**

- Scottish Planning Policy (SPP)

### **Development Plan**

#### **Aberdeen City and Shire Strategic Development Plan (2020)**

The current Strategic Development Plan for Aberdeen City and Shire was approved by Scottish Ministers in September 2020 and forms the strategic component of the Development Plan. No issues of strategic or cross boundary significance have been identified.

#### **Aberdeen Local Development Plan (2017)**

Section 16 (1)(a)(ii) of the Town and Country Planning (Scotland) Act 1997 requires that, where there is a current local development plan, a proposed local development plan must be submitted to Scottish Ministers within 5 years after the date on which the current plan was approved. From 21 January 2022, the extant local development plan will be beyond this 5-year period. The Proposed Aberdeen Local Development Plan 2020 has been submitted to the Planning &



Environmental Appeals Division at the Scottish Government in July 2021. The formal examination in public of the Proposed Local Development Plan 2020 has commenced with reporters appointed. Material consideration will be given to the Proposed Local Development Plan 2020, in the context of the progress of its examination, in the assessment of planning applications.

Given the extant local development plan is beyond its five-year review period consideration, where relevant, weight should be given to paragraph 33 of the Scottish Planning Policy (2014) which states: “Where relevant policies in a development plan are out-of-date or the plan does not contain policies relevant to the proposal, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration.

The following policies are relevant –

- Policy B1 (Business and Industrial Land)
- Policy B4 (Aberdeen Airport)
- Policy NE6 (Flooding, Drainage and Water Quality)
- Policy T2 (Managing the Transport Impact of Development)

### **Supplementary Guidance and Technical Advice Notes**

- Transport and Accessibility

### **Proposed Aberdeen Local Development Plan (2020)**

The Proposed Aberdeen Local Development Plan (Proposed ALDP) was approved at the Council meeting of 2 March 2020. A period of representation in public was undertaken from May to August 2020 and the Proposed ALDP has since been submitted to the Scottish Government Planning and Environmental Appeals Division for Examination in Public. The Proposed ALDP constitutes the Council’s settled view as to what the final content of the next adopted ALDP should be and is now a material consideration in the determination of planning applications. The Aberdeen Local Development Plan 2017 will continue to be the primary document against which applications are considered. The exact weight to be given to matters contained in the Proposed ALDP (including individual policies) in relation to specific applications will depend on whether –

- such matters have or have not received representations as a result of the period of representations in public for the Proposed ALDP;
- the level of representations received in relation to relevant components of the Proposed ALDP and their relevance of these matters to the application under consideration.

The foregoing can only be assessed on a case-by-case basis.

The following policies are relevant –

- Policy B1 (Business and Industrial Land)
- Policy B3 (Aberdeen International Airport and Perwinnes Radar)
- Policy NE4 (Our Water Environment)
- Policy T2 (Sustainable Transport)
- Policy T3 (Parking)

### **Other Material Considerations**

- Regional Transport Strategy
- Local Transport Strategy

## **EVALUATION**

### **Land Use Zoning**

The site is within an area zoned as business and industrial land, where Policy B1 applies. The policy states that *“Land zoned for business and industrial uses, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types.”*

The proposed use as a car park, predominately for airport passengers, does not fall within Class 4, 5 or 6 and therefore is not considered a business or industrial use in terms of the policy.

The policy however goes onto say that *“Other uses which may be suited to a business and industrial location, such as car showrooms and bus depots, shall be treated on their own merits.”*

Although car parks are not included in the list of examples, it is considered that a car park could be consistent with the general purpose of the policy. A car park is not a sensitive use which could be affected by surrounding industrial uses or noise generated by the airport and there are several car parks associated with existing uses, already located at neighbouring sites. Therefore, in terms of amenity and the potential for prejudicing existing uses and activities in the area, the use would sit comfortably alongside those around it. In terms of the wider context and location within the city, the proposed use relies heavily on being in a convenient location in relation to the airport which it is proposed to serve in order to be successful. It would therefore not be unusual or unreasonable to find such a use within a business park adjacent to an airport.

Policy B1 also states that *“Facilities that directly support business and industrial uses may be permitted where they enhance the attraction and sustainability of the city’s business and industrial land. Such facilities should be aimed primarily at meeting the needs of businesses and employees within the business and industrial area.”*

The applicant has argued that the car park would provide parking for businesses in the surrounding area and that the proposal is therefore lent support by the policy. However, decision makers are required to consider the aims of Local Development Plan as a whole. In the context of the proposal, this part of the policy cannot be considered in isolation from transport policies which control the level of parking permitted alongside particular uses.

The Transport and Accessibility Supplementary Guidance (SG) states that *“Adequate parking can maintain and improve the economic vitality of town centres, enhance the attractiveness of an area for development and is required to prevent overspill parking into surrounding areas. The over-provision of parking spaces can however be a wasteful use of land, lead to increased land prices, reduce building densities and increase distances people must walk between adjacent land uses. Overprovision of parking can also reduce travel by alternative forms of transport through the promotion of car use, resulting in the worsening of congestion and air quality problems.*

It goes on to say that *“There will be a presumption against the creation of freestanding publicly-accessible car parks (aside from those required for office, residential or Park and Ride use), especially in city centre locations, as this would undermine efforts to encourage the use of alternative forms of transport.”*

The initial proposal was for a car park which would serve airport passengers only. This has since been changed so that it would be available for use by employees of the businesses in the surrounding area too. This would represent additional parking provision, unrelated to any new development such as new industrial or office space.

The level of parking which is provided alongside new developments, such as business and industrial premises, is dictated by parking standards contained within the guidance, which are based on the national standards within SPP. In Kirkhill, parking associated with the different uses in the area will typically have been provided at the maximum permitted by the standards. It should therefore be sufficient for the demand created by those uses. No evidence has been provided that there is a lack of parking within Kirkhill or that the additional parking as proposed would meet any need generated by businesses or employees in the area. If localised parking problems do exist this would be better addressed through enforcement of indiscriminate parking, provision of alternatives to the private car or, if considered appropriate, additional parking at the use or site generating the parking problems.

The provision of a standalone car park, accessible to anyone who works in Kirkhill, would likely encourage people to drive to the area, rather than take more sustainable means of transport, a matter which is explored further in the following section. It is therefore considered that the proposal would fail on the final part of Policy B1 as it would not enhance the sustainability of the area. There is also a clear conflict with the Transport and Accessibility SG and therefore proposal would not be acceptable in principle, which is explored further in the following section (*Issues 1, 5 and 6 in representations*).

## **Transportation**

### Sustainable Transport

Scottish Planning Policy indicates that planning authorities, airport operators and other stakeholders should work together to prepare airport masterplans and address other planning and transport issues relating to airports, including surface transport access for passengers and related on- and off-site development such as transport interchanges, and car parks. Aberdeen International Airport has a masterplan which was published in 2013, however it has not been adopted as supplementary guidance forming part of any Aberdeen Local Development Plan published since then and therefore carries no weight in terms of planning decision making.

Regional Transport Strategy (RTS) has at its core, a commitment to reducing the dependence on the use of the private car, and especially single occupancy car trips. The RTS also recognises the role of the airport in serving a wide catchment and seeks to ensure that surface access options are available from key towns and settlements, park and ride sites and via interchange to enable better access generally. Similarly, the central theme of the Local Transport Strategy (LTS), is to promote sustainable transport and increase the amount of active travel within Aberdeen to help to reduce congestion and improve the environment. Both the RTS and LTS, see increasing the use of public transport usage to and from the airport as desirable. In recent years, access to the airport by public transport has been significantly improved through the introduction of the Jet 727 service, providing a frequent link into the city centre and areas between it and the airport, now also complemented by the X27 service.

Policy T2 (Managing the Transport Impact of Development) states that commensurate with the scale and anticipated impact, new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel.

Policy T3 (Sustainable and Active Travel) although focusing on the development of new communities and developments, follows a similar theme, indicating that opportunities for active and sustainable travel (particularly walking, cycling and public transport use) increase the range of transport options available to users, offering a cheaper alternative than car-based travel. Such opportunities also support the development of sustainable communities by reducing the need to travel by car, promote physical and mental health and wellbeing, contribute towards tackling

environmental problems, and contribute to economic development by reducing congestion and ensuring road space is prioritised for essential movements.

The car park's proposed use as general car park for workers in the area has been considered above. However, it is accepted that airport car parking is somewhat unique in how it operates and can often be found located out with airport boundaries. It is considered there would be a difference between it and mainstream parking. Therefore, it is necessary to consider that model separately, to determine whether a car park operated in that manner alone would be acceptable.

In applying the above transport policy principles to the proposal on the basis that it would be airport parking only, it is considered that increasing car parking capacity at the airport is at odds with national, regional and local transport policy as it in effect encourages passengers to drive to the airport. As extra supply is made available, to attract customers from one another, operators will typically reduce their prices to make their offer more attractive than their competitors. This reduced cost could make driving to and parking at the airport a more attractive option for passengers compared to other more sustainable options, contrary to the transport policies identified above.

Alternatively, there is an argument that in theory that additional car parking could divert passengers from being dropped off at the airport and therefore reduce the number of trips to the airport (two for someone parking vs four for someone being dropped off on departure and collected on arrival). Whilst that may be the case, it has not been demonstrated that there is any current shortage of parking available to prevent this from happening.

The applicant has submitted a transport assessment which suggests that the existing parking provision at the Airport would be unable to meet the parking demand. However, this is based on the crude assumption that the ambitious passenger growth targets set by the airport several years ago (and pre-pandemic) would be met and assumes the proportion of passengers traveling to and from the airport by private car does not change, taking no account of planning and transport policy which seek modal shift to more sustainable means of transport. The airport, through its representation and as indicated in their masterplan, emphasises that growth targets should be seen in the context of improved surface access. It goes on to highlight that it is working with Nestrans, the regional transport partnership, and others to improve surface access to the airport and ensure sustainable means of travel are available. One such example is the Aberdeen Rapid Transit project, which seeks to deliver a prioritised, high-frequency tram-like service, with four key fast-bus routes linking the airport and P&J Live in the north to Portlethen in the south. Links from Bridge of Don to Kingswells and Westhill are also proposed. It has not been demonstrated that additional airport parking is required.

The position that further capacity is required, must also take into account that there are several other sites which could be implemented or have recently become active, which have or could increase capacity if required, as follows.

- A 462-space car park has recently opened at ABZ Business Park, which is within walking distance of the airport's main terminal (planning permission 191456/DPP). This is considered to be in a more convenient location than the proposal site. As a comparable development, the implications of that approval are taken into account later in the report.
- After being used temporarily as a Covid-19 test centre during 2020 and 2021, the Park and Depart car park at Wellheads Drive, with space for 530 vehicles, has re-opened (*Issue 4*).
- The former Aberdeen Air Park, located at Cairn Industrial Park, on the edge of Kirkhill Industrial Estate, had capacity for 1,300 vehicles and closed in March 2020 after operating for 17 years.

The owner has advised that that facility will be re-opening imminently, with initial capacity for 750 vehicles but the ability to increase that to 1,300 if demand is sufficient (Issue 10).

- Several airport hotels provide 'park and fly' offers where hotel guests can leave their car at the hotel car park whilst away, increasing long stay parking capacity beyond that provided by the standalone car parks.

If demand did exceed supply, notwithstanding the desire to see a modal shift away from the private car, there are more sustainable options available for increasing capacity, such as better use of the Craibstone Park and Ride site which has 999 spaces which is currently underutilised. Furthermore, Nestrans is currently reviewing its Park and Ride Strategy to encourage and promote greater use of Park and Ride both within the city and shire.

Therefore, it would be preferable to utilise existing parking provision more effectively and allow new sustainable transport options to absorb increased demand, rather than provide more parking capacity. This would be consistent with SPP which indicates that the planning system should support patterns of development which optimises the use of existing infrastructure (para 270).

In summary, the proposals would be inconsistent with the aforementioned policies designed to encourage modal shift to more sustainable means of transport such a public transport options (*Issues 1 and 5*).

### Traffic

The submitted transport assessment indicates that around four vehicle trips per hour would be associated with the car park, based on use by airport passenger use. No assessment has been made on the basis of it being used more generally by workers in the surrounding area. Notwithstanding, as workers would be travelling to the area whether or not the car park exists, the traffic impact is likely to be negligible. The ACC Roads Development Management Team have raised no concerns in this regard.

Concern was raised that traffic associated with the car park would conflict with cars parked on Dyce Avenue. However, it is expected these are likely to be spread throughout the day rather than being focused on AM and PM peak hours typical of business and industrial area and with the low levels of traffic expected, this is not considered a concern (Issue 11).

### Pedestrian Access

Pedestrian access to the car park would be via Dyce Avenue, which would result in a 1.51km walk between the site and airport terminal. This is longer than the walk to the existing airport long-stay car park at Montrose Road (around 650m from the terminal) and the recently opened car park at ABZ Business Park (520m from the terminal). Contrary to the applicant's supporting statement, it is considered that the site would not be a convenient location for airport passengers wishing to reach it on foot (*Issue 2*).

A shuttle bus is proposed which would transport passengers from the car park to the terminal on a 30-minute frequency. It is suggested in representations that this may not be commercially viable. Whilst four vehicles an hour would produce only a small number of passengers for a bus to transport, an operator may choose to run such a service at a loss. As the application is being refused it is not considered necessary to investigate the viability of a shuttle bus service further (Issue 9).

### Electric Vehicle Charging

Whilst the Electric Vehicle (EV) charging proposed is welcome, little weight can be afforded to it in terms of supporting the principle of development. There are more sustainable ways of delivering increased EV charging infrastructure, specifically retrofitting spaces in existing car parks, rather than creating new spaces for the purpose (*Issue 3*).

## **Drainage**

Policy NE6 (Flooding, Drainage and Water Quality) requires surface water proposals to be the most appropriate available in terms of SuDS and avoid flooding and pollution both during and after construction.

An indicative drainage strategy has been submitted which explains how it is proposed that all surface water flows from the car park would be collected by a series of filter/infiltration trenches excavated at shallow gradients, running south to north across the site and linked by a series of small diameter pipes and online catchpits. The collected run-off would be directed to a swale located along the northern edge of the car park where it would filtrate into the ground. Should the ground not be suitable for infiltration then connection to the Scottish Water surface water sewer is proposed. There are no facilities on site that will require a foul drainage connection and no identified risk of flooding.

The outline drainage proposals are considered acceptable and would provide the necessary treatment of surface water in accordance with Policy NE6.

## **Aviation Safeguarding**

The site lies within the Aberdeen International Airport safeguarded area and Policy B4 (Aberdeen Airport) requires that within safeguarded areas development not compromise the safe operation of the airport. The airport has been consulted and confirm that the proposal does not conflict with safeguarding criteria.

The site is also within the NATS Perwinnes Radar safeguarded area but does not exceed the height thresholds for triggering a consultation.

## **Proposed Aberdeen Local Development Plan**

In relation to this particular application the Proposed Aberdeen Local Development Plan 2020 substantively reiterate those in the adopted Local Development Plan. However, Policy T3 (Parking) indicates that proposals for car parking that are not directly related to new developments will not be supported. As no new development is proposed and the level of parking would be increased without any evidence to justify it, it is considered that the proposal would be inconsistent with this policy. Notwithstanding, as a draft policy it is only possible to afford limited weight to this part of the proposed plan at this stage. It is considered that there is sufficient tension with the adopted plan to warrant refusal of the application, without relying on the proposed plan.

## **Other Material Considerations**

The May 2020 decision of the Local Review Body (LRB) on a similar application at ABZ Business Park (191456/DPP) is also relevant and has been highlighted in the applicant's Planning Supporting Statement. The reasons for approval by the LRB are outlined below and accompanied by commentary on how the matters are considered in relation to this application.

- *The LRB acknowledged the need to facilitate modal shift generally but recognised that not all users can access the airport using existing public transport connections, and considered*

*that there remains a need to ensure an adequate supply of on-site parking and choice for travellers.*

It is expected that an adequate supply of parking can be provided from existing car parks. The car park approved by the LRB increased that capacity and it has not been demonstrated that yet further capacity is required.

- *The LRB was also mindful of the economic benefits of a readily accessible airport to the region. It was noted that the proposed site is conveniently located for the airport and, unlike some off-site car parks, would not be dependent on shuttle transfers.*

Although in close proximity to the airport, as identified earlier in the report the application site is not conveniently located for pedestrians and would be dependent on shuttle transfers.

- *The closure of an existing long-stay airport car park was a relevant factor and members considered that this proposal can ensure an adequate supply is maintained, preventing any shortage from adversely affecting nearby commercial premises and residential streets due to an overspill of airport parking demand.*

The long stay car park at Cairn Industrial Park is expected to re-open shortly, significantly expanding capacity. The car park at Wellheads Drive was only closed temporarily whilst it was used as a Covid-19 test-centre and is now available again.

- *The LRB also noted the applicants' reference to the growth in public transport use for airport trips in recent years, despite the opening of new airport car parks during that period.*

Planning and transport policy seeks modal shift to more sustainable modes of transport. Granting permission for car parking in an uncoordinated manner would likely hinder modal shift.

- *Support was expressed for the incorporation of additional Electric Vehicle charging points as part of the proposal.*

EV charging has been considered earlier in the report.

- *The LRB also noted the importance of ensuring appropriate landscaping, details of which may be secured by condition, to provide screening and mitigate the visual impact.*

The indicative landscaping proposed is considered acceptable and would suitably mitigate the visual impact of the development.

It is suggested in representations that a Low Emissions Zone should be setup for all vehicles parking at the airport (issue 7) and that cars parked at the airport could be used in trials associated with battery storage (issue 8). However, neither of these matters are proposed in the application and are therefore not relevant or material to its consideration.

## **RECOMMENDATION**

Refuse

**REASON FOR RECOMMENDATION**

That the provision of a standalone car park, accessible to anyone who works in Kirkhill, would encourage people to drive to the area, which is inconsistent with policies, including the Transport and Accessibility Supplementary Guidance, which are designed to encourage modal shift to more sustainable means of transport such as public transport options.

That the proposal would be contrary to Policy B1 Business and Industrial Land, as although a car park in itself is not entirely inconsistent with the land use zoning, when considered in the round alongside transportation policies and the intended purpose related to Aberdeen International Airport, it would not enhance the sustainability of the related business and industrial land.

That it is considered that even as parking were restricted to airport users, the provision of additional car parking capacity near the airport would hinder the ability to encourage modal shift towards the use of public transport. There is no evidence of capacity issues with the existing level of parking available to those using the airport. Any additional supply will make driving to and parking at the airport more attractive. This would be inconsistent with the aims of Scottish Planning Policy, the Regional Transport Strategy, Local Transport Strategy and Policies T2 (Managing the Transport Impact of Development) and T3 (Sustainable and Active Travel) of the Aberdeen Local Development Plan 2017.





Marischal College Planning & Sustainable Development Business Hub 4, Ground Floor North Broad Street Aberdeen AB10 1AB Tel: 01224 523 470 Fax: 01224 636 181 Email: pi@aberdeencity.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100492428-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- Application for planning permission (including changes of use and surface mineral working).
- Application for planning permission in principle.
- Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

The formation of a surface car park.

Is this a temporary permission? \*

Yes  No

If a change of use is to be included in the proposal has it already taken place?

Yes  No

(Answer 'No' if there is no change of use.) \*

Has the work already been started and/or completed? \*

No  Yes – Started  Yes - Completed

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant  Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Pegasus Group		
Ref. Number:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
First Name: *	Sophie	Building Name:	Gainsborough House
Last Name: *	Gooch	Building Number:	34-40
Telephone Number: *	07881918641	Address 1 (Street): *	Grey Street
Extension Number:	<input type="text"/>	Address 2:	<input type="text"/>
Mobile Number:	<input type="text"/>	Town/City: *	Newcastle upon Tyne
Fax Number:	<input type="text"/>	Country: *	United Kingdom
		Postcode: *	NE1 6AE
Email Address: *	sophie.gooch@pegasusgroup.co.uk		

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	c/o Agent
First Name: *	<input type="text"/>	Building Number:	<input type="text"/>
Last Name: *	<input type="text"/>	Address 1 (Street): *	c/o Agent
Company/Organisation	The Hub (NW) Limited	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	c/o Agent
Extension Number:	<input type="text"/>	Country: *	United Kingdom
Mobile Number:	<input type="text"/>	Postcode: *	EH3 9QA
Fax Number:	<input type="text"/>		
Email Address: *	sophie.gooch@pegasusgroup.co.uk		

## Site Address Details

Planning Authority:

Full postal address of the site (including postcode where available):

Address 1:

Address 2:

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

Post Code:

Please identify/describe the location of the site or sites

Northing

Easting

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*  Yes  No

## Pre-Application Discussion Details Cont.

In what format was the feedback given? \*

Meeting  Telephone  Letter  Email

Please provide a description of the feedback you were given and the name of the officer who provided this feedback. If a processing agreement [note 1] is currently in place or if you are currently discussing a processing agreement with the planning authority, please provide details of this. (This will help the authority to deal with this application more efficiently.) \* (max 500 characters)

Title:	<input type="text" value="Mr"/>	Other title:	<input type="text"/>
First Name:	<input type="text" value="Matthew"/>	Last Name:	<input type="text" value="Easton"/>
Correspondence Reference Number:	<input type="text" value="210942/PREAPP"/>	Date (dd/mm/yyyy):	<input type="text" value="10/08/2021"/>

Note 1. A Processing agreement involves setting out the key stages involved in determining a planning application, identifying what information is required and from whom and setting timescales for the delivery of various stages of the process.

## Site Area

Please state the site area:

0.69

Please state the measurement type used:

Hectares (ha)  Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

The site currently comprises an undeveloped plot.

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

Yes  No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? \*

Yes  No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?

0

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? \*

274

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

## Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? \*

Yes  No

Do your proposals make provision for sustainable drainage of surface water?? \* (e.g. SUDS arrangements) \*

Yes  No

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? \*

- Yes  
 No, using a private water supply  
 No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

## Assessment of Flood Risk

Is the site within an area of known risk of flooding? \*

Yes  No  Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? \*

Yes  No  Don't Know

## Trees

Are there any trees on or adjacent to the application site? \*

Yes  No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

## Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? \*

Yes  No

If Yes or No, please provide further details: \* (Max 500 characters)

Not applicable to the proposed development.

## Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? \*

Yes  No

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

Yes  No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013) \*

Yes  No  Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \*

Yes  No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \*

Yes  No

Is any of the land part of an agricultural holding? \*

Yes  No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate A

## Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Certificate A

I hereby certify that –

(1) - No person other than myself/the applicant was an owner (Any person who, in respect of any part of the land, is the owner or is the lessee under a lease thereof of which not less than 7 years remain unexpired.) of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding

Signed: Sophie Gooch

On behalf of: The Hub (NW) Limited

Date: 03/12/2021

Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

b) If this is an application for planning permission or planning permission in principal where there is a crown interest in the land, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

Yes  No  Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

Yes  No  Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

Yes  No  Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

Yes  No  Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

Site Layout Plan or Block plan.

Elevations.

Floor plans.

Cross sections.

Roof plan.

Master Plan/Framework Plan.

Landscape plan.

Photographs and/or photomontages.

Other.

If Other, please specify: \* (Max 500 characters)

Provide copies of the following documents if applicable:

A copy of an Environmental Statement. *	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
A Design Statement or Design and Access Statement. *	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
A Flood Risk Assessment. *	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). *	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> N/A
Drainage/SUDS layout. *	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> N/A
A Transport Assessment or Travel Plan	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> N/A
Contaminated Land Assessment. *	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
Habitat Survey. *	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> N/A
A Processing Agreement. *	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A

Other Statements (please specify). (Max 500 characters)

Planning Statement, Operational Strategy.

## **Declare – For Application to Planning Authority**

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mrs Sophie Gooch

Declaration Date: 07/06/2022

## **Payment Details**

Departmental Charge Code: 100492428

Created: 14/12/2021 11:13



# MEMO



To	Matthew Easton Planning & Infrastructure	Date	17/01/2022
		Our Ref.	211759/DPP
From	Michael Cowie		
Email	<a href="mailto:micowie@aberdeencity.gov.uk">micowie@aberdeencity.gov.uk</a>		
Dial	01224 523671		
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**Strategic Place Planning**  
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DX 529451, Aberdeen 9  
[www.aberdeencity.gov.uk](http://www.aberdeencity.gov.uk)

## **Planning Application No. 211759/DPP – Re-surfacing of site to form part airport car park including change of use at Land off Dyce Avenue, Aberdeen AB21 0BH.**

I have considered the above planning application and have the following observations:

### **1 Development Proposal**

- 1.1 It is noted this application for re-surfacing of site to form airport car parking including change of use at Land off Dyce Avenue, Aberdeen AB21 0BH.
- 1.2 It is noted this site is located in the outer city and not within an area with any form of controlled parking measures.
- 1.3 It is noted that following previous discussions with the Council's Transport Strategy and NESTRAN's colleagues, it is considered that such a proposal is contrary to Council Policies in reducing private vehicular trips and undermines the viability of alternative sustainable transportation. Additionally, Scottish Government published its updated Climate Change Delivery Plan for a green recovery post COVID-19, which includes a commitment to reduce car kilometres by 20% by 2030 and airport travel by sustainable methods would certainly benefit this.
- 1.4 The applicant has attempted to provide justification that there is a requirement for further related airport associated parking, however it is considered that there is sufficient long term parking around the Dyce area. Additionally, while it is noted that one car park located on Wellheads Drive is being utilised for Government COVID-19 Testing Centre but this shall eventually revert back to long stay 'Park and Depart' car park serving the airport.
- 1.5 It is noted the vehicular access to the site would be via Dyce Avenue which is confirmed to already be designed to ACC standards when this area of development was constructed. Therefore, there would be no requirement for a Section 56 Roads Construction Consent (RCC) but if there was proposed to be any alterations then this would be required.

## **2 Conclusion**

- 2.1 It is confirmed that Roads Development Management and Transportation Strategy Team object to this application and proposal, based on the reasons stated above.

Michael Cowie  
Engineer  
**Roads Development Management**



[www.coraiht.com](http://www.coraiht.com)

Thistle Road

Aberdeen Airport

Transport Statement of Case

Final Report for

**The Hub (NW) Ltd.**

December 2022

Cora IHT Ltd  
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Cora IHT Registered in England No 10321930

Infrastructure Highways Transport

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## Document Control

**Document:** Transport Statement  
**Client:** The Hub (NW) Ltd.  
**Project Number:** 16-2043  
**Document Number:** T002  
**Status:** Final  
**Issue:** 2

**Prepared:** TC  
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**Date:** 14<sup>th</sup> December 2022

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1	22 <sup>nd</sup> November 2022	1 <sup>st</sup> Issue
2	14 <sup>th</sup> December 2022	2 <sup>nd</sup> Issue
3		
4		

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**CONTENTS**

<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>3</b>
1.1	Qualification and Experience .....	3
1.2	Proposed Development .....	3
<b>2.0</b>	<b>CONSULTATION CONCERNS .....</b>	<b>5</b>
2.1	Reason 1 for Refusal .....	5
2.2	Reason 3 for Refusal .....	10
<b>3.0</b>	<b>CONCLUSION .....</b>	<b>12</b>
3.1	Conclusion .....	12

**APPENDICES**

**APPENDIX A – BUS SERVICES**

**APPENDIX B – CAR PARK BEAT SURVEY PHOTOS**

**APPENDIX C – CAR PARK ACCUMULATION SURVEY**

## 1.0 INTRODUCTION

### 1.1 Qualification and Experience

1.1.1 My name is Toan Chau and I am a Director of Cora IHT Ltd. I hold a master's degree [MSc] in Highway Management and Engineering and a bachelor's degree [BEng (Hons)] in Civil Engineering.

1.1.2 Having worked in the transport sector for the last 24 years, I have considerable experience in the fields of highways, traffic and transportation, particularly in relation to the planning and development control aspects across the spectrum of land uses including residential, renewables, energy, retail, employment, leisure, health and education.

1.1.3 In addition to producing Transportation Assessments, Travel Plans, negotiating S106 agreements and S278 works, I've undertaken town centre studies, public transport studies, provided input into environmental impact assessments, and assessed brownfield regeneration sites. I have represented Clients at all levels, at Public Consultations, meetings in respect of both statutory requirements and the community involvement process, and I have prepared and given evidence at planning hearings and inquiries.

### 1.2 Proposed Development

1.2.1 This Transport of Case relates to planning application 211759/DPP for a 274 off airport car park located to the east of Thistle Road, Aberdeen. **Figure 1.1** illustrates the site location.

**Figure 1.1: Site Location**



1.2.2 The application was refused on 21<sup>st</sup> September 2022. The reasons for refusal set out by the Planning Authority were as follows:

*1. That the provision of a stand-alone car park, accessible to anyone who works in Kirkhill, would encourage people to drive to the area, which is inconsistent with policies, including the Transport and Accessibility Supplementary Guidance, which are designed to encourage modal shift to more sustainable means of transport such as public transport options.*

*2. That the proposal would be contrary to Policy B1 Business and Industrial Land, as although a car park in itself is not entirely inconsistent with the land use zoning, when considered in the round alongside transportation policies and the intended purpose related to Aberdeen International Airport, it would not enhance the sustainability of the related business and industrial land.*

*3. That it is considered that even as parking were restricted to airport users, the provision of additional car parking capacity near the airport would hinder the ability to encourage modal shift towards the use of public transport. There is no evidence of capacity issues with the existing level of parking available to those using the airport. Any additional supply will make driving to and parking at the airport more attractive. This would be inconsistent with the aims of Scottish Planning Policy, the Regional Transport Strategy, Local Transport Strategy and Policies T2 (Managing the Transport Impact of Development) and T3 (Sustainable and Active Travel) of the Aberdeen Local Development Plan 2017.”*

1.2.3 I have reviewed the consultation response from Aberdeen City Council in relation to highways and transport (Reasons 1 and 3), however, to assist the future inquiry I address the main points raised by the Council. I do not address every point made by the Council but that does not mean that I am in agreement with any point that has been made by virtue of omission.

## 2.0 CONSULTATION CONCERNS

### 2.1 Reason 1 for Refusal

2.1.1 The Council's 1<sup>st</sup> reason for refusal was:

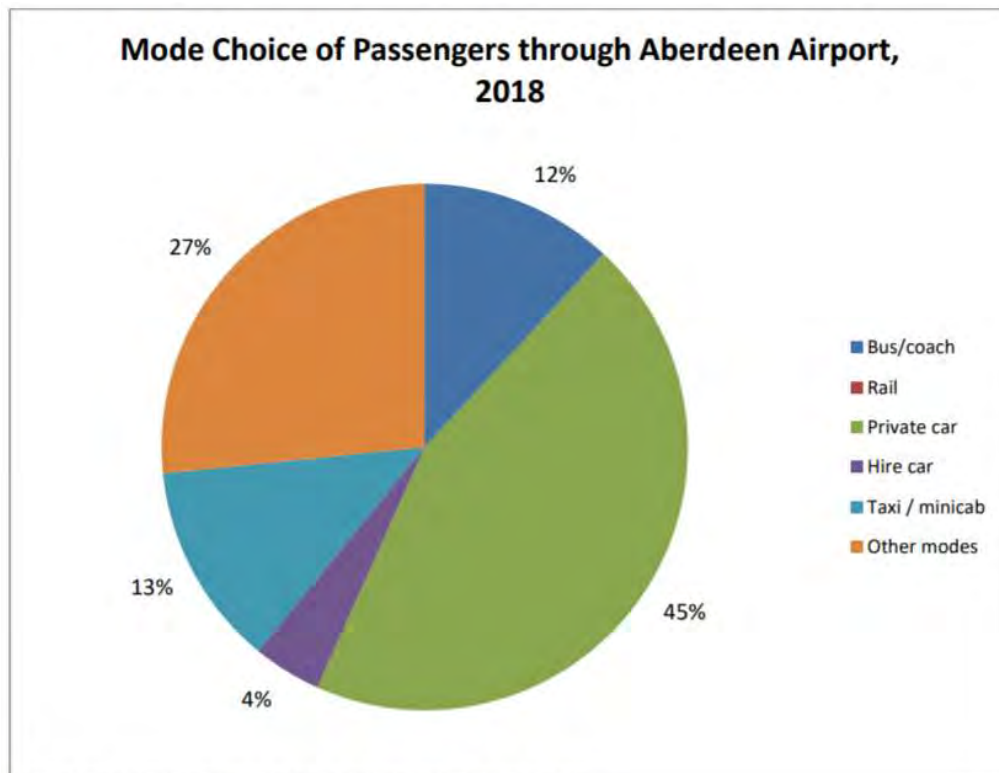
*“That the provision of a stand-alone car park, accessible to anyone who works in Kirkhill, would encourage people to drive to the area, which is inconsistent with policies, including the Transport and Accessibility Supplementary Guidance, which are designed to encourage modal shift to more sustainable means of transport such as public transport options.”*

2.1.2 The Council fails to recognise that the proposed development would provide EV charging for the area striving to influence existing occupiers in Kirkhill to move towards the uptake of electric vehicles. This is discussed in more detail in Section 2.3 of the Transport Statement.

2.1.3 The proposal would assist in achieving a modal shift from fossil-fuelled cars to electric vehicles, providing electric charging facilities which are otherwise not proposed or planned for, to support the government to meet the 2030 and 2035 phase-out dates of combustion engines and the transition to zero emission vehicles.

2.1.4 With regards to public transport, it is agreed that the use of public transport should be promoted to staff and those passengers with minimal luggage to switch from the private car to public transport. In reality larger families of 4 or over with small children would unlikely utilise public transport and there will always be a high proportion who will choose private car for both convenience and safety. See **Figure 2.1** of the Passenger modal split.

**Figure 2.1: Aberdeen Airport Modal Split**

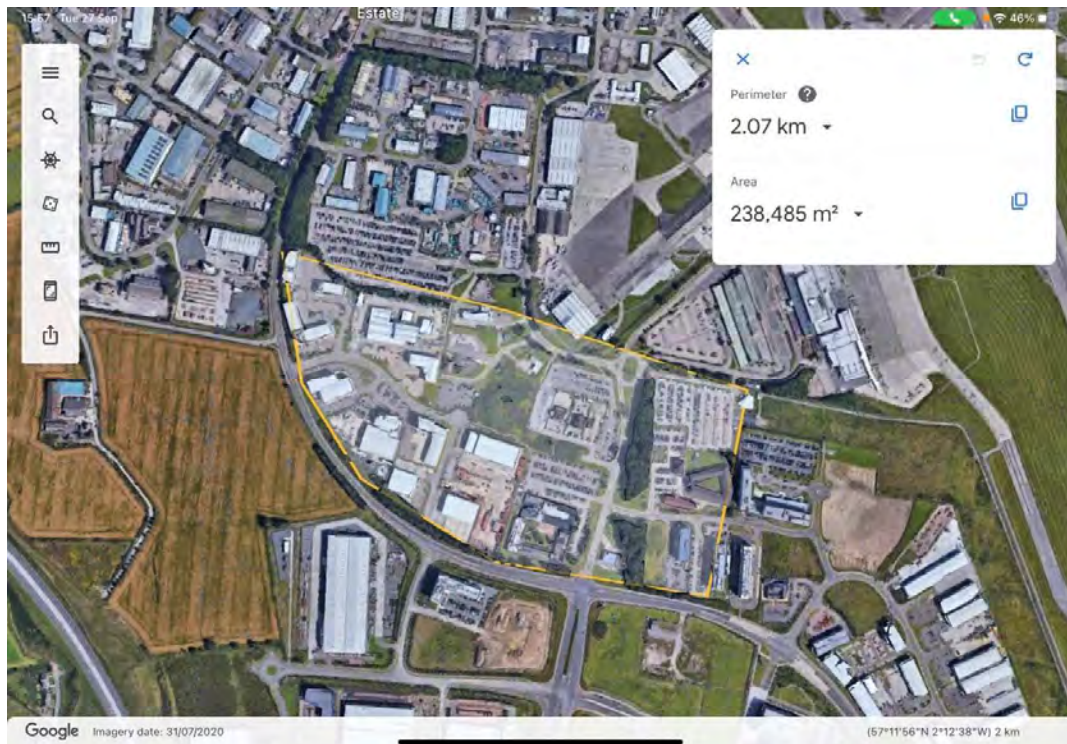


Source: Aberdeen International Airport Survey, 2018



- 2.1.5 It is the larger families where the proposed development would specifically benefit with regards to encouraging the switch to more sustainable electric vehicles.
- 2.1.6 Notwithstanding the need for family parking, there are currently only 2 bus services (727 and X27) which provide access to the airport;
- X27: Guild Street - Dyce Railway Station Via P&J Live - Airport - Kirkhill Ind Estate.
  - 727: - Bus Station - Union St - Broad St - P&J Live – Airport.
- 2.1.7 The 727 provides on average 4 services per hour, whilst the X27 provides 1 service per hour. The services provide access to and from limited areas, therefore, would not be suitable for the entire Airport catchment, or larger families. **Appendix A** provides the bus service timetables.
- 2.1.8 It is understood that the Council have aspirations to improve the public transport provision to through a combination of dedicated bus lanes, off board fare collection, fast and efficient boarding and alighting (Aberdeen Rapid Transport Scheme). The proposals are still at an early stage and would not provide any significant improvement to the public transport facilities within the short or medium term, with the earliest operating year being 2030 serving initial key routes.
- 2.1.9 A car parking beat survey was carried out on 10<sup>th</sup> November 2022 within the area shown in **Figure 2.2**.

**Figure 2.2: Car Park Beat Survey Area**



- 2.1.10 The survey confirmed that within the observed area minimal parking occurred (See **Appendix B** for photos). The majority of the highway network within the observed area were subject to “No Parking” traffic regulation orders (double yellow lines) keeping the highway network free flowing. There were, however, some overspill parking along Dyce Avenue and layby areas as shown in **Photos 1 and 2**.

2.1.11 It can be deduced that the proposed development could minimise overspill that currently exists.

**Photo 1: Dyce Avenue**



**Photo 2: Holiday Inn Layby**



2.1.12 The Officers Report of Handling stated the following:

*“Whilst the Electric Vehicle (EV) charging proposed is welcome, little weight can be afforded to it in terms of supporting the principle of development. There are more sustainable ways of delivering increased EV charging infrastructure, specifically retrofitting spaces in existing car parks, rather than creating new spaces for the purpose (Issue 3).”*

2.1.13 It is highlighted that the Transport and Accessibility Supplementary Guidance states in 3.2 the following:

*“It is significantly cheaper and less disruptive to install EV infrastructure during construction than to retrofit later and enables future users of the development to choose whether or not to own an EV.”*

2.1.14 The Council fails to recognise that there is no requirement for existing residents, businesses and visitors within Kirkhill to provide EV car parking, therefore, the Council fails to justify how they can encourage EV charging in the area to meet the Scottish Government’s commitment to encouraging and facilitating the uptake of electric vehicles (EVs).

2.1.15 There appears to be limited scope for the Council to provide EV charging within the highway network around Kirkhill industrial estate as the majority of the area is subject to “No Parking” traffic regulation orders (double yellow lines), therefore, the Council cannot demonstrate a future supply of EV parking in line with the Scottish Government’s commitment to encouraging and facilitating the uptake of electric vehicles.

2.1.16 **Appendix B** provides photos within the local highway network.

2.1.17 Of the 274 parking spaces proposed for the site, 70 spaces would be for electric vehicle charging, 18 of which would be installed with charging equipment and 42 of which would have cabling so that equipment can be installed at a future date. The proposals to provide EV charging for the site strives to influence existing occupiers in Kirkhill to move towards the uptake of electric vehicles which is the reason why the applicant would open the proposed car park development to all people within the area.

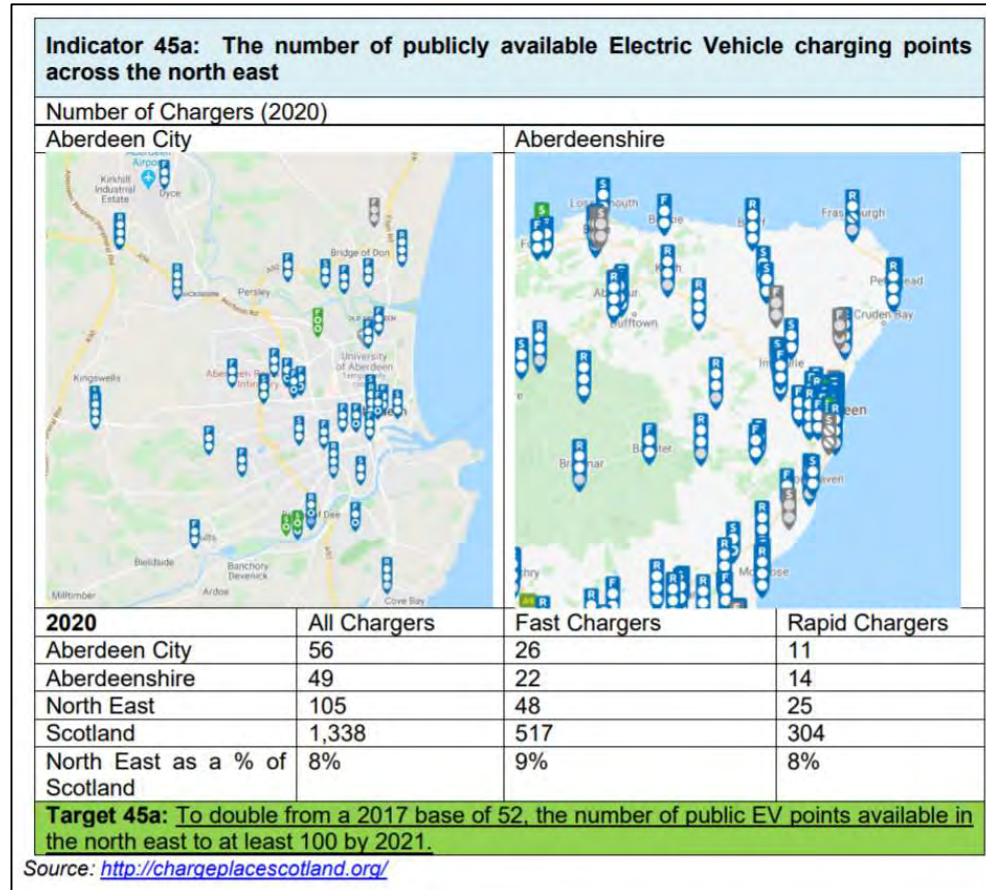
2.1.18 The Council fails to recognise that the proposed development would provide EV charging for the area striving to influence existing occupiers in Kirkhill to move towards the uptake of electric vehicles. Without this valuable infrastructure to trigger travel behaviour then to provide EV charging for the area it is unlikely that The Scottish Government commitment to complete decarbonisation of road transport by 2050 would be fulfilled.

2.1.19 Planning and delivering EV infrastructure that meets the current and future needs of residents, businesses and visitors is critical in the governments’ objective for zero emissions car travel.

2.1.20 An improved EV infrastructure will enable the government to meet the 2030 and 2035 phase-out dates of combustion engines and the transition to zero emission vehicles (referenced from the Department for Transport and Office for Zero Emission Vehicles Consulting on ending the sale of new petrol, diesel and hybrid cars and vans 20 February 2020).

2.1.21 As of 2020 there was some 56 public EV charging facilities within the Aberdeen area as shown in **Figure 2.3**.

Figure 2.3: Available EV Charging



- 2.1.22 The proposals would more than double the existing EV charging within Aberdeen, therefore, providing significant EV infrastructure in an area where these is minimal scope to encourage us of electric vehicles.
- 2.1.23 The proposed development accords with the Transport and Accessibility Supplementary Guidance to encourage modal shift and in this regard to electric vehicles.

## 2.2 Reason 3 for Refusal

2.2.1 The Council's 3<sup>rd</sup> reason for refusal was:

*"That it is considered that even as parking were restricted to airport users, the provision of additional car parking capacity near the airport would hinder the ability to encourage modal shift towards the use of public transport. There is no evidence of capacity issues with the existing level of parking available to those using the airport. Any additional supply will make driving to and parking at the airport more attractive. This would be inconsistent with the aims of Scottish Planning Policy, the Regional Transport Strategy, Local Transport Strategy and Policies T2 (Managing the Transport Impact of Development) and T3 (Sustainable and Active Travel) of the Aberdeen Local Development Plan 2017."*

2.2.2 The Officers Report of Handling states that:

*There is an argument that in theory that additional car parking could divert passengers from being dropped off at the airport and therefore reduce the number of trips to the airport (two for someone parking vs four for someone being dropped off on departure and collected on arrival).*

2.2.3 What the Council fails to assess is the need for EV charging which currently is limited within the area. Not only do the proposals potentially reduce the number of trips made to the airport but also these trips could be made by electric vehicles.

2.2.4 As the Council cannot demonstrate a suitable supply of EV charging in line with the aims of Scottish Planning Policy, the Regional Transport Strategy, Local Transport Strategy and Policies T2 (Managing the Transport Impact of Development) and T3 (Sustainable and Active Travel) of the Aberdeen Local Development Plan 2017, the proposed development, therefore, is able to assist with the aspirations for increased EV infrastructure to enable the government to meet the 2030 and 2035 phase-out dates of combustion engines and the transition to zero emission vehicles.

2.2.5 Without the proposed development the Council's sustainable transport policy cannot be practically met.

2.2.6 In order to justify airport parking demand, car parking accumulation surveys were carried out during the October 2022 half term. 5 airport car park sites were considered, however, at the time only 2 were opened. The car parks considered were as follows:

1. Aberdeen Airport Long Stay (1007 spaces, no EV Charging) had max occupancy of 88%.
2. ABZ Business Park (462 spaces, 12 EV Charging) had max occupancy of 79%.
3. Craibstone Park and Ride (999 spaces no EV) - closed.
4. Cairn Industrial Park and Ride 1400 spaces, no EV Charging - closed.
5. Aberdeen Airport Park & Depart at Wellshead Drive 530 spaces - closed.

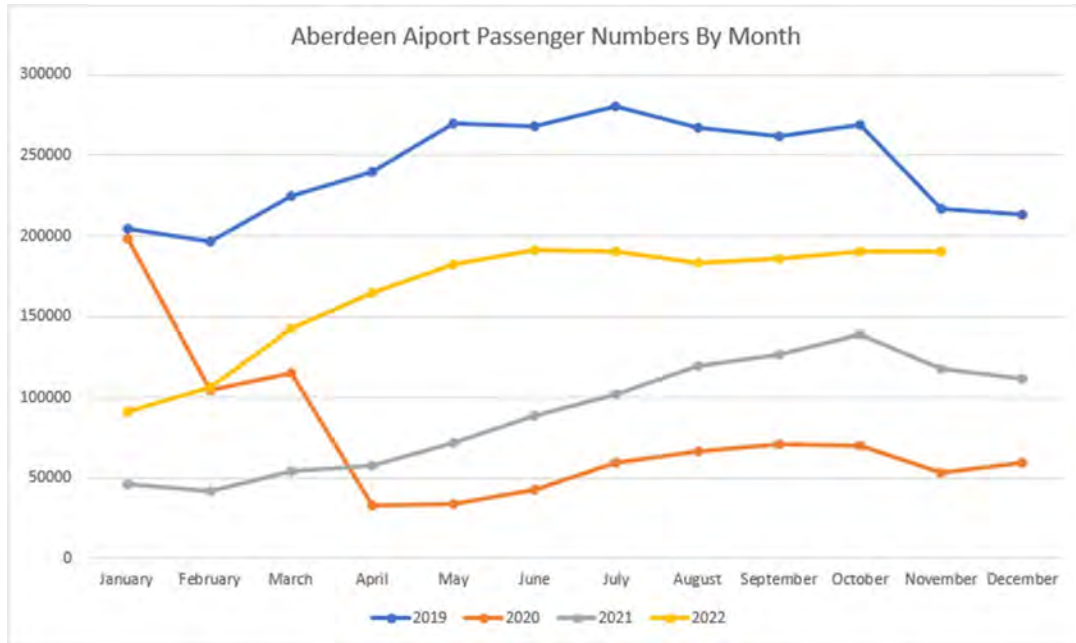
2.2.7 The foregoing shows that there were 1469 spaces available with only 12 EV spaces for airport parking. This is well below what is required to meet the Council's EV parking policy.

2.2.8 The two opened airport car parking at the time of the survey were already approaching capacity. The full survey results provided in **Appendix C**.

2.2.9 Currently 2022 passenger figures have been calculated up to and including October using the "Aircraft and passenger traffic data from UK airports" published by the UK Civil Aviation Authority.

2.2.10 It is estimated that passenger numbers for the full 2022 year would be approximately 1.9M. **Figure 2.4** summaries the passenger numbers between 2019 to present.

**Figure 2.4: Aberdeen Airport Passenger Numbers Summary**



- 2.2.11 **Figure 2.4** shows that passenger numbers for 2022 were returning to pre-covid levels.
- 2.2.12 The Aberdeen International Airport Master Plan 2013 forecasts estimate that Aberdeen will handle around 5.0 million passengers a year by 2040.
- 2.2.13 If the annual passenger targets are realised, then there could be a requirement for 6,902 car parking spaces (refer to Transport Statement submitted with the planning application).
- 2.2.14 Notwithstanding the above, with a total of 1,469 airport car parking spaces available at the time of the surveys it can be deduced that there is a significant shortfall in car parking provision for the airport.
- 2.2.15 When considering current EV parking provisions of only 12 EV spaces for airport parking. The proposed development which includes for 70 EV spaces will in the short to medium term fulfil some of the existing shortfall. This is in addition to the demand for EV parking for the whole Kirkhill area.
- 2.2.16 **Table 2.1** summarises the existing and future parking provisions.

**Table 2.1: Airport Parking Summary**

Existing spaces – 2022	Potential future spaces	Required spaces - 2040
1,469 (3 car parks closed)	1,743 (existing provision + 274 proposed at appeal site)	6,902 required (based on annual passenger targets)
Existing EV charging - 2022	Potential future EV charging	Required charging – 10% existing policy requirement
12 EV chargers (at 1 car park only)	82 chargers (existing provision + 70 proposed at appeal site)	690 EV chargers

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### **3.0 CONCLUSION**

#### **3.1 *Conclusion***

- 3.1.1 It is concluded that the development proposals should be acceptable in highways and transportation terms. There are no highways or transportation related reasons upon which a refusal of the planning application for the proposals would be justified.

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## APPENDICES



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## APPENDIX A – BUS SERVICES

**MONDAY TO FRIDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Northlink Terminal																	0752
Aberdeen Union Sq JET Stance	0300	0400	0500	0530	0600	0615	0630	0645	0700	0715	0730	0745	0800	0815	0830	0845	0900
Great Northern Rd Northern Hotel	0310	0411	0511	0541	0611	0626	0643	0658	0713	0728	0743	0759	0814	0827	0842	0901	0916
Bucksburn Police Station	0318	0420	0520	0550	0620	0636	0654	0709	0724	0739	0754	0810	0825	0842	0857	0912	0927
P&J Live Event Complex	0321	0423	0523	0553	0623	0640	0657	0716	0731	0746	0801	0817	0832	0849	0904	0920	0935
Aberdeen Airport Terminal	0327	0432	0532	0602	0631	0648	0705	0728	0743	0758	0813	0829	0844	0859	0914	0931	0946
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	0915	0930	0945	1000	1015	1030	1045	1100	1115	1130	1145	1200	1215	1230	1245	1300	1315
Great Northern Rd Northern Hotel	0929	0944	0959	1014	1029	1044	1059	1114	1129	1144	1159	1214	1229	1244	1259	1314	1329
Bucksburn Police Station	0940	0955	1010	1025	1040	1055	1110	1125	1140	1155	1210	1225	1240	1255	1310	1325	1340
P&J Live Event Complex	0948	1003	1018	1033	1048	1103	1118	1133	1148	1203	1218	1233	1248	1303	1318	1333	1348
Aberdeen Airport Terminal	0959	1014	1029	1044	1059	1114	1129	1144	1159	1214	1229	1244	1259	1314	1329	1344	1359
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	1330	1345	1400	1415	1430	1445	1500	1515	1530	1545	1600	1615	1630	1645	1700	1715	1730
Great Northern Rd Northern Hotel	1344	1359	1414	1429	1444	1459	1514	1531	1546	1601	1616	1631	1646	1701	1716	1731	1746
Bucksburn Police Station	1355	1410	1425	1440	1455	1510	1525	1542	1557	1612	1627	1642	1657	1711	1727	1742	1757
P&J Live Event Complex	1403	1418	1433	1448	1503	1518	1532	1549	1606	1621	1636	1651	1705	1719	1736	1751	1806
Aberdeen Airport Terminal	1414	1429	1444	1459	1514	1529	1542	1559	1620	1634	1649	1704	1719	1733	1749	1804	1819
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	1745	1800	1820	1840	1900	1920	1940	2000	2020	2040	2100	2130	2200	2230	2335		
Great Northern Rd Northern Hotel	1801	1816	1835	1855	1915	1935	1954	2014	2034	2054	2114	2144	2214	2244	2349		
Bucksburn Police Station	1812	1827	1846	1906	1926	1946	2004	2024	2044	2104	2124	2154	2224	2254	2359		
P&J Live Event Complex	1820	1835	1853	1911	1931	1951	2008	2028	2048	2108	2128	2157	2227	2257	0002		
Aberdeen Airport Terminal	1832	1847	1903	1919	1939	1959	2016	2035	2055	2115	2135	2204	2234	2304	0009		



**MONDAY TO FRIDAY**

	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Airport Terminal	0329	0435	0535	0605	0635	0650	0710	0735	0755	0810	0825	0840	0855	0910	0925	0940	0955
P&J Live Event Complex	0335	0440	0540	0610	0641	0656	0717	0743	0803	0818	0832	0847	0902	0917	0932	0947	1002
Bucksburn Police Station	0339	0444	0544	0614	0646	0701	0722	0748	0808	0823	0837	0852	0907	0922	0937	0952	1007
Great Northern Rd Northern Hotel	0347	0452	0552	0622	0656	0712	0734	0801	0821	0836	0848	0903	0918	0933	0948	1003	1018
Aberdeen Union Sq JET Stance	0359	0505	0605	0635	0711	0729	0755	0822	0842	0857	0907	0922	0937	0952	1007	1022	1037
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Airport Terminal	1010	1025	1040	1055	1110	1125	1140	1155	1210	1225	1240	1255	1310	1325	1340	1355	1410
P&J Live Event Complex	1017	1032	1047	1102	1117	1132	1147	1202	1217	1232	1247	1302	1317	1332	1347	1402	1417
Bucksburn Police Station	1022	1037	1052	1107	1122	1137	1152	1207	1222	1237	1252	1307	1322	1337	1352	1407	1422
Great Northern Rd Northern Hotel	1033	1048	1103	1118	1133	1148	1203	1218	1233	1248	1303	1318	1333	1348	1403	1418	1433
Aberdeen Union Sq JET Stance	1052	1107	1122	1137	1152	1207	1222	1237	1252	1307	1322	1337	1352	1407	1422	1437	1452
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Airport Terminal	1425	1440	1455	1510	1525	1540	1555	1610	1625	1640	1655	1710	1725	1740	1755	1810	1825
P&J Live Event Complex	1432	1447	1502	1516	1532	1548	1603	1618	1633	1648	1702	1716	1731	1746	1801	1816	1832
Bucksburn Police Station	1437	1452	1507	1521	1537	1553	1608	1623	1638	1653	1707	1721	1736	1751	1806	1821	1837
Great Northern Rd Northern Hotel	1448	1503	1518	1532	1548	1605	1620	1635	1650	1705	1717	1732	1746	1801	1816	1831	1846
Aberdeen Northlink Terminal				1551								1751					
Aberdeen Union Sq JET Stance	1507	1522	1537	1556	1607	1627	1642	1655	1710	1724	1736	1756	1805	1820	1835	1850	1904
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Airport Terminal	1840	1855	1910	1930	1950	2000	2020	2040	2100	2120	2140	2205	2235	2305	0010		
P&J Live Event Complex	1846	1901	1916	1936	1956	2007	2027	2047	2107	2127	2147	2212	2242	2312	0017		
Bucksburn Police Station	1851	1906	1921	1941	2001	2011	2031	2051	2111	2131	2151	2216	2246	2316	0021		
Great Northern Rd Northern Hotel	1907	1916	1931	1951	2011	2021	2041	2101	2121	2141	2201	2225	2255	2325	0029		
Aberdeen Union Sq JET Stance	1919	1933	1948	2008	2027	2037	2057	2117	2134	2154	2214	2236	2306	2334	0039		



**SATURDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Northlink Terminal								0720									
Aberdeen Union Sq JET Stance	0300	0400	0505	0530	0600	0630	0700	0730	0800	0820	0840	0900	0920	0940	1000	1020	1040
Great Northern Rd Northern Hotel	0310	0411	0516	0541	0611	0641	0711	0744	0815	0835	0854	0914	0934	0954	1014	1034	1054
Bucksburn Police Station	0318	0420	0525	0550	0620	0650	0720	0754	0825	0846	0905	0924	0944	1004	1024	1044	1104
P&J Live Event Complex	0322	0424	0529	0554	0624	0654	0724	0757	0829	0850	0909	0928	0948	1008	1028	1048	1108
Aberdeen Airport Terminal	0327	0432	0537	0602	0632	0702	0732	0802	0836	0857	0916	0935	0955	1015	1035	1055	1115
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	1100	1120	1140	1200	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620
Great Northern Rd Northern Hotel	1114	1134	1154	1214	1234	1254	1314	1334	1354	1414	1434	1454	1514	1534	1554	1615	1635
Bucksburn Police Station	1124	1144	1204	1224	1244	1304	1324	1344	1404	1424	1444	1504	1524	1544	1604	1625	1645
P&J Live Event Complex	1128	1148	1208	1228	1248	1308	1328	1348	1408	1428	1448	1508	1528	1548	1608	1629	1649
Aberdeen Airport Terminal	1135	1155	1215	1235	1255	1315	1335	1355	1415	1435	1455	1515	1535	1555	1615	1636	1656
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	1640	1700	1720	1740	1800	1820	1840	1900	1920	1940	2000	2030	2100	2130	2200	2230	2335
Great Northern Rd Northern Hotel	1655	1715	1735	1755	1814	1834	1854	1914	1934	1954	2014	2044	2114	2144	2214	2244	2349
Bucksburn Police Station	1705	1725	1745	1805	1824	1844	1904	1924	1944	2004	2024	2054	2124	2154	2224	2254	2359
P&J Live Event Complex	1709	1729	1749	1809	1828	1848	1908	1928	1948	2008	2028	2058	2128	2158	2228	2258	0003
Aberdeen Airport Terminal	1716	1736	1756	1816	1835	1855	1915	1935	1955	2015	2034	2104	2134	2204	2234	2304	0009

Page 84



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**SATURDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	0329	0435	0540	0605	0635	0705	0735	0810	0840	0900	0920	0940	1000	1020	1040	1100	1120
P&J Live Event Complex	0335	0441	0546	0611	0641	0711	0741	0816	0846	0908	0928	0948	1008	1028	1048	1108	1128
Bucksburn Police Station	0339	0444	0549	0614	0644	0715	0745	0820	0850	0912	0932	0952	1012	1032	1052	1112	1132
Great Northern Rd Northern Hotel	0348	0453	0558	0623	0653	0725	0755	0830	0900	0922	0942	1002	1022	1042	1102	1122	1142
Aberdeen Union Sq JET Stance	0359	0504	0609	0634	0704	0738	0809	0844	0917	0939	0959	1019	1039	1059	1119	1139	1159
	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1140	1200	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620	1640	1700
P&J Live Event Complex	1148	1208	1228	1248	1308	1328	1348	1408	1428	1448	1508	1524	1546	1606	1626	1646	1706
Bucksburn Police Station	1152	1212	1232	1252	1312	1332	1352	1412	1432	1452	1512	1528	1550	1610	1630	1650	1710
Great Northern Rd Northern Hotel	1202	1222	1242	1302	1322	1342	1402	1422	1442	1502	1522	1538	1600	1620	1640	1700	1720
Aberdeen Northlink Terminal												1551					
Aberdeen Union Sq JET Stance	1219	1239	1259	1319	1339	1359	1419	1439	1459	1519	1539	1559	1615	1635	1655	1715	1735
	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1720	1740	1800	1820	1840	1900	1920	1940	2000	2020	2040	2105	2135	2205	2235	2305	0010
P&J Live Event Complex	1726	1746	1806	1826	1846	1906	1926	1946	2006	2026	2046	2111	2141	2211	2241	2311	0016
Bucksburn Police Station	1730	1750	1810	1830	1850	1910	1930	1950	2010	2030	2050	2115	2145	2215	2245	2315	0020
Great Northern Rd Northern Hotel	1740	1800	1820	1840	1900	1919	1939	1959	2019	2039	2059	2124	2154	2224	2254	2324	0029
Aberdeen Union Sq JET Stance	1755	1815	1835	1855	1915	1935	1955	2015	2035	2055	2111	2136	2206	2236	2306	2334	0039



**SUNDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Northlink Terminal	0720																
Aberdeen Union Sq JET Stance	0300	0400	0505	0600	0705	0730	0800	0820	0840	0900	0920	0940	1000	1020	1040	1100	1120
Great Northern Rd Northern Hotel	0310	0411	0516	0611	0716	0742	0814	0834	0854	0914	0934	0954	1014	1034	1054	1114	1134
Bucksburn Police Station	0318	0420	0525	0620	0725	0750	0824	0844	0904	0924	0944	1004	1024	1044	1104	1124	1144
P&J Live Event Complex	0322	0424	0529	0624	0729	0755	0828	0848	0908	0928	0948	1008	1028	1048	1108	1128	1148
Aberdeen Airport Terminal	0327	0432	0537	0632	0736	0801	0835	0855	0915	0935	0955	1015	1035	1055	1115	1135	1155

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Union Sq JET Stance	1140	1200	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620	1640	1700
Great Northern Rd Northern Hotel	1154	1214	1234	1254	1314	1334	1354	1414	1434	1454	1514	1534	1554	1614	1634	1654	1714
Bucksburn Police Station	1204	1224	1244	1304	1324	1344	1404	1424	1444	1504	1524	1544	1604	1624	1644	1704	1724
P&J Live Event Complex	1208	1228	1248	1308	1328	1348	1408	1428	1448	1508	1528	1548	1608	1628	1648	1708	1728
Aberdeen Airport Terminal	1215	1235	1255	1315	1335	1355	1415	1435	1455	1515	1535	1555	1615	1635	1655	1715	1735

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Union Sq JET Stance	1720	1740	1800	1820	1840	1900	1920	1940	2000	2030	2100	2130	2200	2230	2335		
Great Northern Rd Northern Hotel	1734	1754	1814	1834	1854	1914	1934	1953	2013	2043	2113	2143	2213	2243	2348		
Bucksburn Police Station	1744	1804	1824	1844	1904	1924	1944	2003	2023	2053	2123	2153	2223	2253	2358		
P&J Live Event Complex	1748	1808	1828	1848	1908	1927	1947	2006	2026	2056	2126	2156	2226	2256	0001		
Aberdeen Airport Terminal	1755	1815	1835	1855	1915	1934	1954	2013	2033	2103	2133	2203	2233	2303	0008		

Page 86



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**SUNDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	0330	0435	0540	0635	0740	0810	0840	0900	0920	0940	1000	1020	1040	1100	1120	1140	1200
P&J Live Event Complex	0336	0441	0546	0641	0747	0817	0847	0907	0927	0947	1008	1028	1048	1108	1128	1148	1208
Bucksburn Police Station	0339	0444	0549	0644	0750	0820	0850	0910	0930	0950	1012	1032	1052	1112	1132	1152	1212
Great Northern Rd Northern Hotel	0347	0453	0558	0653	0800	0830	0900	0920	0940	1000	1022	1042	1102	1122	1142	1202	1222
Aberdeen Union Sq JET Stance	0359	0504	0609	0704	0815	0845	0915	0935	0955	1017	1039	1059	1119	1139	1159	1219	1239

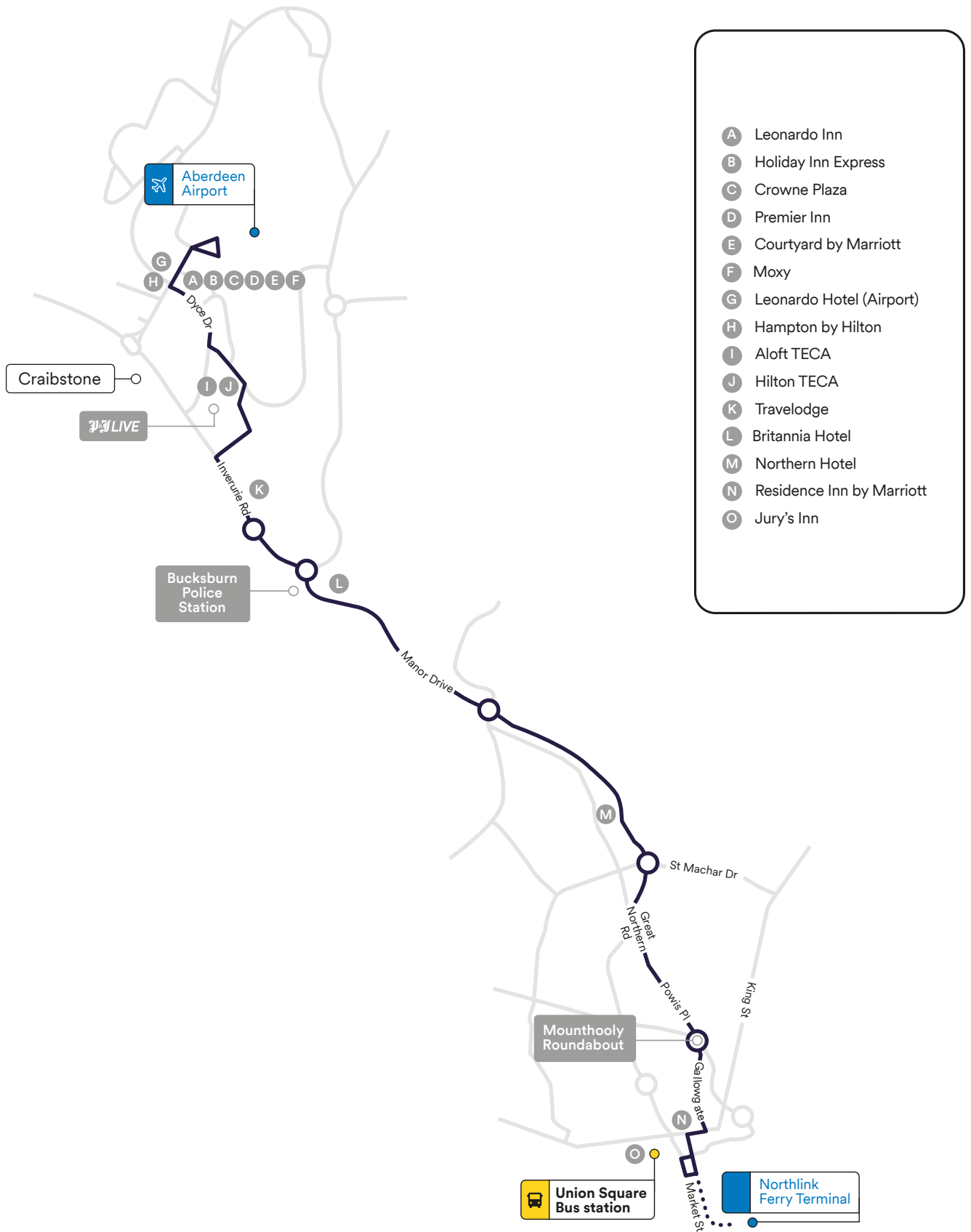
	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620	1640	1700	1720	1740
P&J Live Event Complex	1228	1248	1308	1328	1348	1408	1428	1448	1508	1524	1548	1608	1628	1648	1708	1728	1748
Bucksburn Police Station	1232	1252	1312	1332	1352	1412	1432	1452	1512	1527	1552	1612	1632	1652	1712	1732	1752
Great Northern Rd Northern Hotel	1242	1302	1322	1342	1402	1422	1442	1502	1522	1535	1602	1622	1642	1702	1722	1742	1802
Aberdeen Northlink Terminal										1549							
Aberdeen Union Sq JET Stance	1259	1319	1339	1359	1419	1439	1459	1519	1539	1557	1619	1639	1659	1719	1739	1759	1817

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1800	1820	1840	1900	1920	1940	2000	2020	2040	2105	2135	2205	2235	2305	0010	
P&J Live Event Complex	1807	1827	1847	1907	1927	1947	2007	2027	2047	2112	2142	2212	2242	2312	0017	
Bucksburn Police Station	1810	1830	1850	1910	1930	1950	2010	2030	2050	2115	2145	2215	2245	2315	0020	
Great Northern Rd Northern Hotel	1820	1840	1900	1920	1940	2000	2020	2039	2059	2124	2154	2224	2254	2324	0029	
Aberdeen Union Sq JET Stance	1835	1855	1915	1935	1955	2015	2032	2051	2111	2136	2206	2236	2306	2334	0039	

Page 87



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# Timetables for Aberdeen Service Number X27

Valid from 12/11/2022 to 10/12/2022

## X27: Guild Street - Dyce Railway Station Via P&J Live - Alrport - Kirkhill Ind Estate

### Saturday

Service No.:	X27	X27	X27	X27	X27	X27	X27	X27	X27	X27
<b>Notes:</b>										
<b>Guild Street [M3] - 639006463</b>	0535	0645	0745	0845	0955	1055	1155	1250	1330	1440
<b>Holburn Junction - 639006354</b>	0543	0653	0753	0853	1003	1103	1203	1258	1338	1448
<b>Manor Drive - 639004361</b>	0555	0705	0805	0906	1016	1116	1216	1311	1351	1501
<b>TECA (P&amp;J LIVE) - 639007977</b>	0601	0711	0811	0912	1022	1122	1222	1317	1357	1507
<b>Aberdeen Airport - 639005613</b>	0608	0718	0818	0919	1029	1129	1229	1324	1404	1514
<b>CHC Helicopters - 639005313</b>	0613	0723	0823	0923	1033	1133	1233	1328	1408	1518
<b>Howe Moss Drive - 639008351</b>	0616	0726	0826	----	----	----	----	1332	----	1522
<b>Dyce Railway Station - 639005631</b>	0629	0739	0839	0935	1045	1145	1245	1344	1420	1534

Service No.:	X27	X27	X27
<b>Notes:</b>			
<b>Guild Street [M3] - 639006463</b>	1530	1630	1730
<b>Holburn Junction - 639006354</b>	1538	1638	1738
<b>Manor Drive - 639004361</b>	1551	1651	1751
<b>TECA (P&amp;J LIVE) - 639007977</b>	1557	1657	1757
<b>Aberdeen Airport - 639005613</b>	1604	1704	1804
<b>CHC Helicopters - 639005313</b>	1608	1708	1808
<b>Howe Moss Drive - 639008351</b>	----	1712	----
<b>Dyce Railway Station - 639005631</b>	1620	1724	1820

## X27: Dyce Railway Station - Guild Street Via Kirkhill Ind Estate - Airport - P&J Live

### Saturday

Service No.:	X27	X27	X27	X27	X27	X27	X27	X27	X27	X27
<b>Notes:</b>										
<b>Dyce Railway Station - 639005631</b>	0632	0745	0845	0945	1055	1155	1255	1345	1425	1535
<b>Howe Moss Drive - 639008351</b>	0645	0757	0857	----	----	----	1307	----	1437	----
<b>CHC Helicopters - 639005313</b>	0654	0806	0906	0957	1107	1207	1316	1357	1446	1547
<b>Aberdeen Airport - 639005613</b>	0700	0812	0912	1002	1112	1212	1321	1402	1451	1552
<b>TECA (P&amp;J LIVE) - 639007978</b>	0707	0819	0919	1009	1119	1219	1328	1409	1458	1559
<b>Manor Drive - 639004372</b>	----	0827	0927	1017	1127	1227	1336	1417	1506	1607
<b>Holburn Junction - 639006355</b>	----	0840	0940	1029	1139	1239	1348	1429	1518	1619
<b>Guild Street - 639006463</b>	----	0848	0948	1037	1147	1247	1356	1437	1526	1627

<b>Service No.:</b>	<b>X27</b>	<b>X27</b>
<b>Notes:</b>		
<b>Dyce Railway Station - 639005631</b>	1625	1730
<b>Howe Moss Drive - 639008351</b>	1637	----
<b>CHC Helicopters - 639005313</b>	1646	1742
<b>Aberdeen Airport - 639005613</b>	1651	1747
<b>TECA (P&amp;J LIVE) - 639007978</b>	1658	1754
<b>Manor Drive - 639004372</b>	1706	1802
<b>Holburn Junction - 639006355</b>	1718	1814
<b>Guild Street - 639006463</b>	1726	1822

**MONDAY TO FRIDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Northlink Terminal																	0752
Aberdeen Union Sq JET Stance	0300	0400	0500	0530	0600	0615	0630	0645	0700	0715	0730	0745	0800	0815	0830	0845	0900
Great Northern Rd Northern Hotel	0310	0411	0511	0541	0611	0626	0643	0658	0713	0728	0743	0759	0814	0827	0842	0901	0916
Bucksburn Police Station	0318	0420	0520	0550	0620	0636	0654	0709	0724	0739	0754	0810	0825	0842	0857	0912	0927
P&J Live Event Complex	0321	0423	0523	0553	0623	0640	0657	0716	0731	0746	0801	0817	0832	0849	0904	0920	0935
Aberdeen Airport Terminal	0327	0432	0532	0602	0631	0648	0705	0728	0743	0758	0813	0829	0844	0859	0914	0931	0946
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	0915	0930	0945	1000	1015	1030	1045	1100	1115	1130	1145	1200	1215	1230	1245	1300	1315
Great Northern Rd Northern Hotel	0929	0944	0959	1014	1029	1044	1059	1114	1129	1144	1159	1214	1229	1244	1259	1314	1329
Bucksburn Police Station	0940	0955	1010	1025	1040	1055	1110	1125	1140	1155	1210	1225	1240	1255	1310	1325	1340
P&J Live Event Complex	0948	1003	1018	1033	1048	1103	1118	1133	1148	1203	1218	1233	1248	1303	1318	1333	1348
Aberdeen Airport Terminal	0959	1014	1029	1044	1059	1114	1129	1144	1159	1214	1229	1244	1259	1314	1329	1344	1359
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	1330	1345	1400	1415	1430	1445	1500	1515	1530	1545	1600	1615	1630	1645	1700	1715	1730
Great Northern Rd Northern Hotel	1344	1359	1414	1429	1444	1459	1514	1531	1546	1601	1616	1631	1646	1701	1716	1731	1746
Bucksburn Police Station	1355	1410	1425	1440	1455	1510	1525	1542	1557	1612	1627	1642	1657	1711	1727	1742	1757
P&J Live Event Complex	1403	1418	1433	1448	1503	1518	1532	1549	1606	1621	1636	1651	1705	1719	1736	1751	1806
Aberdeen Airport Terminal	1414	1429	1444	1459	1514	1529	1542	1559	1620	1634	1649	1704	1719	1733	1749	1804	1819
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Union Sq JET Stance	1745	1800	1820	1840	1900	1920	1940	2000	2020	2040	2100	2130	2200	2230	2335		
Great Northern Rd Northern Hotel	1801	1816	1835	1855	1915	1935	1954	2014	2034	2054	2114	2144	2214	2244	2349		
Bucksburn Police Station	1812	1827	1846	1906	1926	1946	2004	2024	2044	2104	2124	2154	2224	2254	2359		
P&J Live Event Complex	1820	1835	1853	1911	1931	1951	2008	2028	2048	2108	2128	2157	2227	2257	0002		
Aberdeen Airport Terminal	1832	1847	1903	1919	1939	1959	2016	2035	2055	2115	2135	2204	2234	2304	0009		

Page 91



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**MONDAY TO FRIDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	0329	0435	0535	0605	0635	0650	0710	0735	0755	0810	0825	0840	0855	0910	0925	0940	0955
P&J Live Event Complex	0335	0440	0540	0610	0641	0656	0717	0743	0803	0818	0832	0847	0902	0917	0932	0947	1002
Bucksburn Police Station	0339	0444	0544	0614	0646	0701	0722	0748	0808	0823	0837	0852	0907	0922	0937	0952	1007
Great Northern Rd Northern Hotel	0347	0452	0552	0622	0656	0712	0734	0801	0821	0836	0848	0903	0918	0933	0948	1003	1018
Aberdeen Union Sq JET Stance	0359	0505	0605	0635	0711	0729	0755	0822	0842	0857	0907	0922	0937	0952	1007	1022	1037
	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1010	1025	1040	1055	1110	1125	1140	1155	1210	1225	1240	1255	1310	1325	1340	1355	1410
P&J Live Event Complex	1017	1032	1047	1102	1117	1132	1147	1202	1217	1232	1247	1302	1317	1332	1347	1402	1417
Bucksburn Police Station	1022	1037	1052	1107	1122	1137	1152	1207	1222	1237	1252	1307	1322	1337	1352	1407	1422
Great Northern Rd Northern Hotel	1033	1048	1103	1118	1133	1148	1203	1218	1233	1248	1303	1318	1333	1348	1403	1418	1433
Aberdeen Union Sq JET Stance	1052	1107	1122	1137	1152	1207	1222	1237	1252	1307	1322	1337	1352	1407	1422	1437	1452
	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1425	1440	1455	1510	1525	1540	1555	1610	1625	1640	1655	1710	1725	1740	1755	1810	1825
P&J Live Event Complex	1432	1447	1502	1516	1532	1548	1603	1618	1633	1648	1702	1716	1731	1746	1801	1816	1832
Bucksburn Police Station	1437	1452	1507	1521	1537	1553	1608	1623	1638	1653	1707	1721	1736	1751	1806	1821	1837
Great Northern Rd Northern Hotel	1448	1503	1518	1532	1548	1605	1620	1635	1650	1705	1717	1732	1746	1801	1816	1831	1846
Aberdeen Northlink Terminal				1551								1751					
Aberdeen Union Sq JET Stance	1507	1522	1537	1556	1607	1627	1642	1655	1710	1724	1736	1756	1805	1820	1835	1850	1904
	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1840	1855	1910	1930	1950	2000	2020	2040	2100	2120	2140	2205	2235	2305	0010		
P&J Live Event Complex	1846	1901	1916	1936	1956	2007	2027	2047	2107	2127	2147	2212	2242	2312	0017		
Bucksburn Police Station	1851	1906	1921	1941	2001	2011	2031	2051	2111	2131	2151	2216	2246	2316	0021		
Great Northern Rd Northern Hotel	1907	1916	1931	1951	2011	2021	2041	2101	2121	2141	2201	2225	2255	2325	0029		
Aberdeen Union Sq JET Stance	1919	1933	1948	2008	2027	2037	2057	2117	2134	2154	2214	2236	2306	2334	0039		



**SATURDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Northlink Terminal								0720									
Aberdeen Union Sq JET Stance	0300	0400	0505	0530	0600	0630	0700	0730	0800	0820	0840	0900	0920	0940	1000	1020	1040
Great Northern Rd Northern Hotel	0310	0411	0516	0541	0611	0641	0711	0744	0815	0835	0854	0914	0934	0954	1014	1034	1054
Bucksburn Police Station	0318	0420	0525	0550	0620	0650	0720	0754	0825	0846	0905	0924	0944	1004	1024	1044	1104
P&J Live Event Complex	0322	0424	0529	0554	0624	0654	0724	0757	0829	0850	0909	0928	0948	1008	1028	1048	1108
Aberdeen Airport Terminal	0327	0432	0537	0602	0632	0702	0732	0802	0836	0857	0916	0935	0955	1015	1035	1055	1115

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Union Sq JET Stance	1100	1120	1140	1200	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620
Great Northern Rd Northern Hotel	1114	1134	1154	1214	1234	1254	1314	1334	1354	1414	1434	1454	1514	1534	1554	1615	1635
Bucksburn Police Station	1124	1144	1204	1224	1244	1304	1324	1344	1404	1424	1444	1504	1524	1544	1604	1625	1645
P&J Live Event Complex	1128	1148	1208	1228	1248	1308	1328	1348	1408	1428	1448	1508	1528	1548	1608	1629	1649
Aberdeen Airport Terminal	1135	1155	1215	1235	1255	1315	1335	1355	1415	1435	1455	1515	1535	1555	1615	1636	1656

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Union Sq JET Stance	1640	1700	1720	1740	1800	1820	1840	1900	1920	1940	2000	2030	2100	2130	2200	2230	2335
Great Northern Rd Northern Hotel	1655	1715	1735	1755	1814	1834	1854	1914	1934	1954	2014	2044	2114	2144	2214	2244	2349
Bucksburn Police Station	1705	1725	1745	1805	1824	1844	1904	1924	1944	2004	2024	2054	2124	2154	2224	2254	2359
P&J Live Event Complex	1709	1729	1749	1809	1828	1848	1908	1928	1948	2008	2028	2058	2128	2158	2228	2258	0003
Aberdeen Airport Terminal	1716	1736	1756	1816	1835	1855	1915	1935	1955	2015	2034	2104	2134	2204	2234	2304	0009

Page 93



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**SATURDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	0329	0435	0540	0605	0635	0705	0735	0810	0840	0900	0920	0940	1000	1020	1040	1100	1120
P&J Live Event Complex	0335	0441	0546	0611	0641	0711	0741	0816	0846	0908	0928	0948	1008	1028	1048	1108	1128
Buckburn Police Station	0339	0444	0549	0614	0644	0715	0745	0820	0850	0912	0932	0952	1012	1032	1052	1112	1132
Great Northern Rd Northern Hotel	0348	0453	0558	0623	0653	0725	0755	0830	0900	0922	0942	1002	1022	1042	1102	1122	1142
Aberdeen Union Sq JET Stance	0359	0504	0609	0634	0704	0738	0809	0844	0917	0939	0959	1019	1039	1059	1119	1139	1159
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Airport Terminal	1140	1200	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620	1640	1700
P&J Live Event Complex	1148	1208	1228	1248	1308	1328	1348	1408	1428	1448	1508	1524	1546	1606	1626	1646	1706
Buckburn Police Station	1152	1212	1232	1252	1312	1332	1352	1412	1432	1452	1512	1528	1550	1610	1630	1650	1710
Great Northern Rd Northern Hotel	1202	1222	1242	1302	1322	1342	1402	1422	1442	1502	1522	1538	1600	1620	1640	1700	1720
Aberdeen Northlink Terminal												1551					
Aberdeen Union Sq JET Stance	1219	1239	1259	1319	1339	1359	1419	1439	1459	1519	1539	1559	1615	1635	1655	1715	1735
	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>	<b>727</b>
Aberdeen Airport Terminal	1720	1740	1800	1820	1840	1900	1920	1940	2000	2020	2040	2105	2135	2205	2235	2305	0010
P&J Live Event Complex	1726	1746	1806	1826	1846	1906	1926	1946	2006	2026	2046	2111	2141	2211	2241	2311	0016
Buckburn Police Station	1730	1750	1810	1830	1850	1910	1930	1950	2010	2030	2050	2115	2145	2215	2245	2315	0020
Great Northern Rd Northern Hotel	1740	1800	1820	1840	1900	1919	1939	1959	2019	2039	2059	2124	2154	2224	2254	2324	0029
Aberdeen Union Sq JET Stance	1755	1815	1835	1855	1915	1935	1955	2015	2035	2055	2111	2136	2206	2236	2306	2334	0039

Page 94



You can also check journey information by going online at [stagecoachbus.com](https://stagecoachbus.com), or by signing up for email updates.

**SUNDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Northlink Terminal	0720																
Aberdeen Union Sq JET Stance	0300	0400	0505	0600	0705	0730	0800	0820	0840	0900	0920	0940	1000	1020	1040	1100	1120
Great Northern Rd Northern Hotel	0310	0411	0516	0611	0716	0742	0814	0834	0854	0914	0934	0954	1014	1034	1054	1114	1134
Bucksburn Police Station	0318	0420	0525	0620	0725	0750	0824	0844	0904	0924	0944	1004	1024	1044	1104	1124	1144
P&J Live Event Complex	0322	0424	0529	0624	0729	0755	0828	0848	0908	0928	0948	1008	1028	1048	1108	1128	1148
Aberdeen Airport Terminal	0327	0432	0537	0632	0736	0801	0835	0855	0915	0935	0955	1015	1035	1055	1115	1135	1155

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Union Sq JET Stance	1140	1200	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620	1640	1700
Great Northern Rd Northern Hotel	1154	1214	1234	1254	1314	1334	1354	1414	1434	1454	1514	1534	1554	1614	1634	1654	1714
Bucksburn Police Station	1204	1224	1244	1304	1324	1344	1404	1424	1444	1504	1524	1544	1604	1624	1644	1704	1724
P&J Live Event Complex	1208	1228	1248	1308	1328	1348	1408	1428	1448	1508	1528	1548	1608	1628	1648	1708	1728
Aberdeen Airport Terminal	1215	1235	1255	1315	1335	1355	1415	1435	1455	1515	1535	1555	1615	1635	1655	1715	1735

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Union Sq JET Stance	1720	1740	1800	1820	1840	1900	1920	1940	2000	2030	2100	2130	2200	2230	2335		
Great Northern Rd Northern Hotel	1734	1754	1814	1834	1854	1914	1934	1953	2013	2043	2113	2143	2213	2243	2348		
Bucksburn Police Station	1744	1804	1824	1844	1904	1924	1944	2003	2023	2053	2123	2153	2223	2253	2358		
P&J Live Event Complex	1748	1808	1828	1848	1908	1927	1947	2006	2026	2056	2126	2156	2226	2256	0001		
Aberdeen Airport Terminal	1755	1815	1835	1855	1915	1934	1954	2013	2033	2103	2133	2203	2233	2303	0008		

Page 95



You can also check journey information by going online at [stagecoachbus.com](https://stagecoachbus.com), or by signing up for email updates.

**SUNDAY**

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	0330	0435	0540	0635	0740	0810	0840	0900	0920	0940	1000	1020	1040	1100	1120	1140	1200
P&J Live Event Complex	0336	0441	0546	0641	0747	0817	0847	0907	0927	0947	1008	1028	1048	1108	1128	1148	1208
Bucksburn Police Station	0339	0444	0549	0644	0750	0820	0850	0910	0930	0950	1012	1032	1052	1112	1132	1152	1212
Great Northern Rd Northern Hotel	0347	0453	0558	0653	0800	0830	0900	0920	0940	1000	1022	1042	1102	1122	1142	1202	1222
Aberdeen Union Sq JET Stance	0359	0504	0609	0704	0815	0845	0915	0935	0955	1017	1039	1059	1119	1139	1159	1219	1239

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1220	1240	1300	1320	1340	1400	1420	1440	1500	1520	1540	1600	1620	1640	1700	1720	1740
P&J Live Event Complex	1228	1248	1308	1328	1348	1408	1428	1448	1508	1524	1548	1608	1628	1648	1708	1728	1748
Bucksburn Police Station	1232	1252	1312	1332	1352	1412	1432	1452	1512	1527	1552	1612	1632	1652	1712	1732	1752
Great Northern Rd Northern Hotel	1242	1302	1322	1342	1402	1422	1442	1502	1522	1535	1602	1622	1642	1702	1722	1742	1802
Aberdeen Northlink Terminal										1549							
Aberdeen Union Sq JET Stance	1259	1319	1339	1359	1419	1439	1459	1519	1539	1557	1619	1639	1659	1719	1739	1759	1817

	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Aberdeen Airport Terminal	1800	1820	1840	1900	1920	1940	2000	2020	2040	2105	2135	2205	2235	2305	0010	
P&J Live Event Complex	1807	1827	1847	1907	1927	1947	2007	2027	2047	2112	2142	2212	2242	2312	0017	
Bucksburn Police Station	1810	1830	1850	1910	1930	1950	2010	2030	2050	2115	2145	2215	2245	2315	0020	
Great Northern Rd Northern Hotel	1820	1840	1900	1920	1940	2000	2020	2039	2059	2124	2154	2224	2254	2324	0029	
Aberdeen Union Sq JET Stance	1835	1855	1915	1935	1955	2015	2032	2051	2111	2136	2206	2236	2306	2334	0039	

Page 96



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# Timetables for Aberdeen Service Number X27

Valid from 07/11/2022 to 09/12/2022

## X27: Guild Street - Dyce Railway Station Via P&J Live - Alrport - Kirkhill Ind Estate

### Monday to Friday

Service No.:	X27	X27	X27	X27	X27	X27	X27	X27	X27	X27
<b>Notes:</b>										
Guild Street [M3] - 639006463	0535	0605	0650	0725	0755	0855	0955	1055	1155	1250
Holburn Junction - 639006354	0543	0613	0658	0734	0804	0903	1003	1103	1203	1258
Manor Drive - 639004361	0555	0625	0710	0749	0819	0916	1016	1116	1216	1311
TECA (P&J LIVE) - 639007977	0601	0631	0716	0757	0827	0922	1022	1122	1222	1317
Aberdeen Airport - 639005613	0608	0638	0723	0805	0835	0929	1029	1129	1229	1324
CHC Helicopters - 639005313	0613	0643	0728	0811	0841	0933	1033	1133	1233	1328
Howe Moss Drive - 639008351	0616	0646	0731	0815	0845	----	----	----	----	----
Dyce Railway Station - 639005631	0629	0659	0744	0830	0900	0945	1045	1145	1245	1340

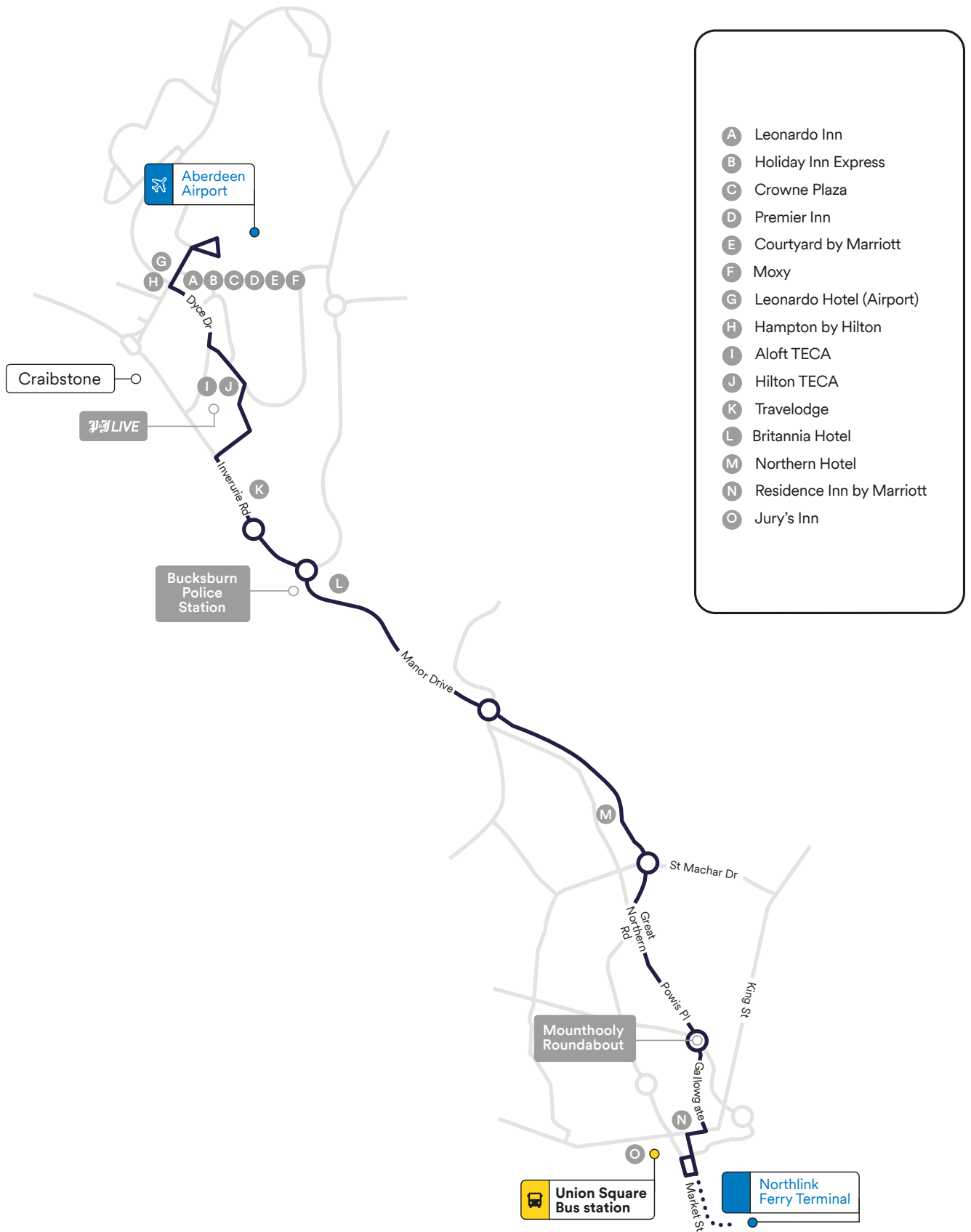
Service No.:	X27	X27	X27	X27	X27	X27
<b>Notes:</b>						
Guild Street [M3] - 639006463	1340	1430	1525	1550	1621	1715
Holburn Junction - 639006354	1348	1439	1534	1559	1632	1726
Manor Drive - 639004361	1401	1452	1547	1612	1647	1741
TECA (P&J LIVE) - 639007977	1407	1459	1554	1619	1655	1749
Aberdeen Airport - 639005613	1414	1506	1601	1626	1702	1756
CHC Helicopters - 639005313	1418	1510	1605	1630	1707	1801
Howe Moss Drive - 639008351	1422	1514	1609	1634	1711	1805
Dyce Railway Station - 639005631	1435	1527	1622	1647	1726	1820

## X27: Dyce Railway Station - Guild Street Via Kirkhill Ind Estate - Airport - P&J Live

### Monday to Friday

Service No.:	X27	X27	X27	X27	X27	X27	X27	X27	X27	X27
<b>Notes:</b>										
Dyce Railway Station - 639005631	0632	0700	0745	0835	0915	0955	1055	1155	1250	1350
Howe Moss Drive - 639008351	0645	0713	0758	0848	----	----	----	----	----	----
CHC Helicopters - 639005313	0654	0722	0807	0857	0928	1008	1108	1208	1303	1403
Aberdeen Airport - 639005613	0700	0728	0813	0903	0934	1013	1113	1213	1308	1408
TECA (P&J LIVE) - 639007978	0707	0735	0820	0910	0941	1020	1120	1220	1315	1415
Manor Drive - 639004372	----	0743	0828	0918	0949	1028	1128	1228	1323	1423
Holburn Junction - 639006355	----	0756	0841	0931	1002	1040	1140	1240	1335	1435
Guild Street - 639006463	----	0804	0849	0939	1010	1048	1148	1248	1343	1443

<b>Service No.:</b>	<b>X27</b>	<b>X27</b>	<b>X27</b>	<b>X27</b>	<b>X27</b>
<b>Notes:</b>					
<b>Dyce Railway Station - 639005631</b>	1500	1600	1630	1700	1730
<b>Howe Moss Drive - 639008351</b>	1513	1615	1645	1715	1745
<b>CHC Helicopters - 639005313</b>	1522	1625	1655	1725	1755
<b>Aberdeen Airport - 639005613</b>	1527	1630	1700	1730	1800
<b>TECA (P&amp;J LIVE) - 639007978</b>	1534	1637	1707	1737	1807
<b>Manor Drive - 639004372</b>	1543	1648	1718	1748	1818
<b>Holburn Junction - 639006355</b>	1556	1703	1733	1803	1833
<b>Guild Street - 639006463</b>	1605	1712	1742	1812	1842



For more detailed journey planning and real-time updates  
**download the Stagecoach Bus App.**



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## APPENDIX B – CAR PARK BEAT SURVEY PHOTOS



Argyll Way (Eastbound)



Argyll Way (Westbound)



Argyll Way / Argyll Road Junction (Northbound)



Argyll Way / Argyll Road Junction (Southbound)



Argyll Road (Northbound)



Forties Road / Thistle Road Junction (Northbound)



Forties Road (Eastbound)



Thistle Road





Thistle Road



Thistle Road (private car park)



Thistle Road



Thistle Road (private car park)



Thistle Road



Thistle Road (private car park)



Thistle Road (Eastbound)



/ Crossroads Junction

Forties Road / Montrose Road / Bristow Helicopters



Forties Road / Montrose Road / Bristow Helicopters /

Crossroads Junction



Montrose Road



Montrose Road Airport Car Park



Montrose Road Airport Car Park



Montrose Road Airport Car Park



Montrose Road Airport Car Park



Montrose Road Airport Car Park



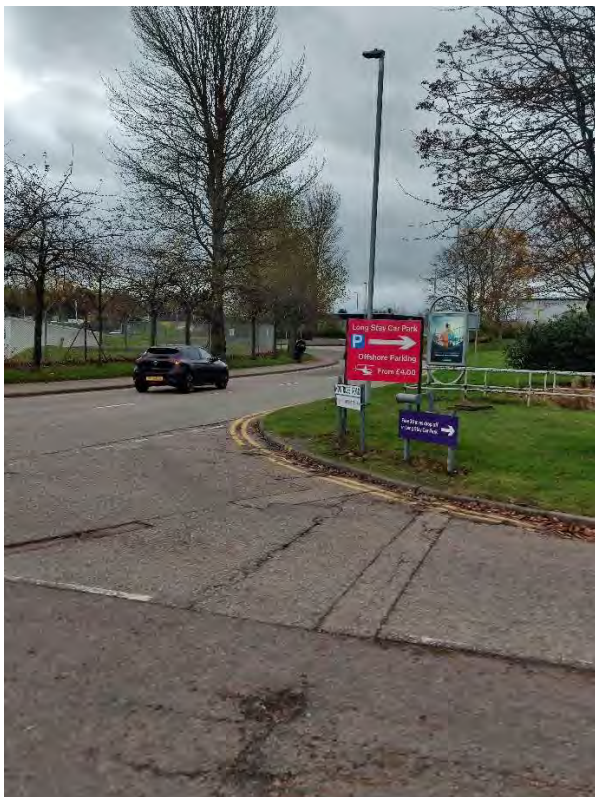
Montrose Road Airport Car Park





Forties Road / Montrose Road / Bristow Helicopters

/ Crossroads Junction



Forties Road / Montrose Road / Bristow Helicopters /

Crossroads Junction



Aberdeen Airport Roundabout (from Forties Road)



Dyce Drive / Airport Road / Argyll Road Signalised

Crossroads



Dyce Drive (Westbound)



Dyce Drive / Harvest Way Junction



Dyce Drive (Westbound)



Dyce Drive / Harvest Way Junction



Dyce Drive (Northbound)



Dyce Drive (Westbound)



Dyce Drive (Eastbound)



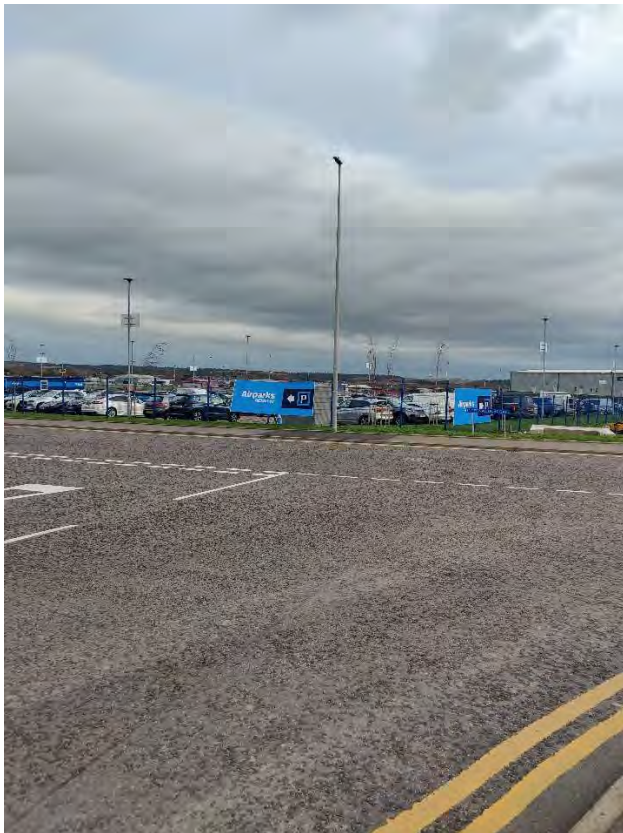
Argyll Road (Northbound)



Argyll Way (Eastbound)



Argyll Way (Eastbound)



Argyll Way / International Way Junction





Argyll Way / International Way Junction



International Way



Argyll Way (Westbound)

Dyce Avenue (Eastbound)



Dyce Avenue (Eastbound)



Dyce Avenue (Westbound)



Dyce Avenue (Westbound)



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## APPENDIX C – CAR PARK ACCUMULATION SURVEY

**Aberdeen Airport**  
Car Park Accumulation Study

**Site 1**  
Aberdeen Airport Long Stay

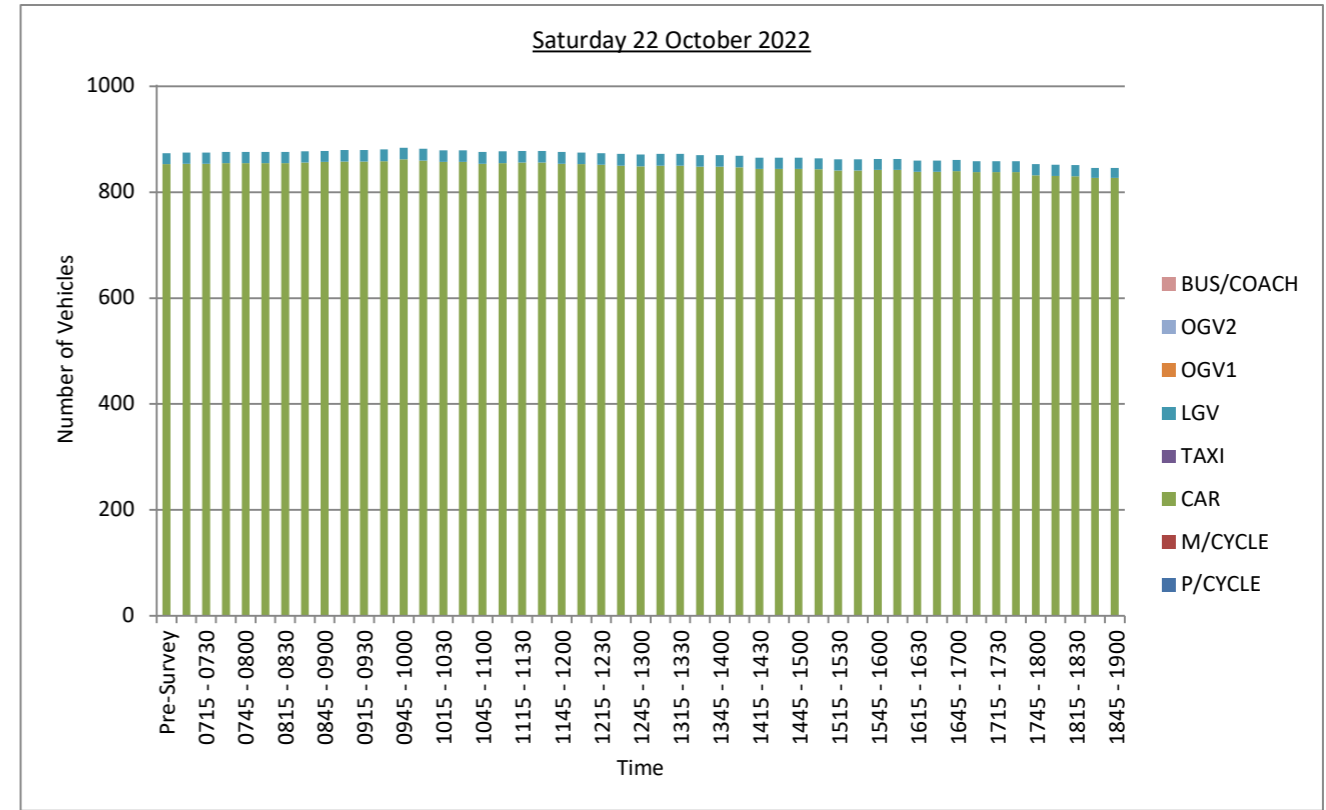
<b>Capacity</b>	
Normal	993
Disabled	10
<b>Total</b>	<b>1003</b>

**Date**  
Saturday 22 October 2022

**Weather**  
Sunny Intervals  
Temp: 14°C

0700 - 1900 (Saturday 12H Session)

TIME	P/CYCLE	M/CYCLE	CAR	TAXI	LGV	OGV1	OGV2	BUS/COACH	TOTAL	PCU TOTAL	Capacity %
Pre-Survey	0	0	853	0	21	0	0	0	874	874.00	87.14
0700 - 0715	0	0	854	0	21	0	0	0	875	875.00	87.24
0715 - 0730	0	0	854	0	21	0	0	0	875	875.00	87.24
0730 - 0745	0	0	855	0	21	0	0	0	876	876.00	87.34
0745 - 0800	0	0	855	0	21	0	0	0	876	876.00	87.34
0800 - 0815	0	0	855	0	21	0	0	0	876	876.00	87.34
0815 - 0830	0	0	855	0	21	0	0	0	876	876.00	87.34
0830 - 0845	0	0	856	0	21	0	0	0	877	877.00	87.44
0845 - 0900	0	0	857	0	21	0	0	0	878	878.00	87.54
0900 - 0915	0	0	858	0	22	0	0	0	880	880.00	87.74
0915 - 0930	0	0	858	0	22	0	0	0	880	880.00	87.74
0930 - 0945	0	0	859	0	22	0	0	0	881	881.00	87.84
0945 - 1000	0	0	862	0	22	0	0	0	884	884.00	88.14
1000 - 1015	0	0	860	0	22	0	0	0	882	882.00	87.94
1015 - 1030	0	0	857	0	22	0	0	0	879	879.00	87.64
1030 - 1045	0	0	857	0	22	0	0	0	879	879.00	87.64
1045 - 1100	0	0	854	0	22	0	0	0	876	876.00	87.34
1100 - 1115	0	0	855	0	22	0	0	0	877	877.00	87.44
1115 - 1130	0	0	856	0	22	0	0	0	878	878.00	87.54
1130 - 1145	0	0	856	0	22	0	0	0	878	878.00	87.54
1145 - 1200	0	0	854	0	22	0	0	0	876	876.00	87.34
1200 - 1215	0	0	853	0	22	0	0	0	875	875.00	87.24
1215 - 1230	0	0	852	0	22	0	0	0	874	874.00	87.14
1230 - 1245	0	0	850	0	22	0	0	0	872	872.00	86.94
1245 - 1300	0	0	849	0	22	0	0	0	871	871.00	86.84
1300 - 1315	0	0	850	0	22	0	0	0	872	872.00	86.94
1315 - 1330	0	0	850	0	22	0	0	0	872	872.00	86.94
1330 - 1345	0	0	848	0	22	0	0	0	870	870.00	86.74
1345 - 1400	0	0	848	0	22	0	0	0	870	870.00	86.74
1400 - 1415	0	0	847	0	22	0	0	0	869	869.00	86.64
1415 - 1430	0	0	844	0	21	0	0	0	865	865.00	86.24
1430 - 1445	0	0	844	0	21	0	0	0	865	865.00	86.24
1445 - 1500	0	0	844	0	21	0	0	0	865	865.00	86.24
1500 - 1515	0	0	843	0	21	0	0	0	864	864.00	86.14
1515 - 1530	0	0	841	0	21	0	0	0	862	862.00	85.94
1530 - 1545	0	0	841	0	21	0	0	0	862	862.00	85.94
1545 - 1600	0	0	842	0	21	0	0	0	863	863.00	86.04
1600 - 1615	0	0	842	0	21	0	0	0	863	863.00	86.04
1615 - 1630	0	0	839	0	21	0	0	0	860	860.00	85.74
1630 - 1645	0	0	839	0	21	0	0	0	860	860.00	85.74
1645 - 1700	0	0	840	0	21	0	0	0	861	861.00	85.84
1700 - 1715	0	0	838	0	21	0	0	0	859	859.00	85.64
1715 - 1730	0	0	838	0	21	0	0	0	859	859.00	85.64
1730 - 1745	0	0	838	0	21	0	0	0	859	859.00	85.64
1745 - 1800	0	0	832	0	21	0	0	0	853	853.00	85.04
1800 - 1815	0	0	831	0	21	0	0	0	852	852.00	84.95
1815 - 1830	0	0	830	0	21	0	0	0	851	851.00	84.85
1830 - 1845	0	0	827	0	19	0	0	0	846	846.00	84.35
1845 - 1900	0	0	827	0	19	0	0	0	846	846.00	84.35



**Aberdeen Airport**  
Car Park Accumulation Study

**Site 2**  
ABZ Business Park

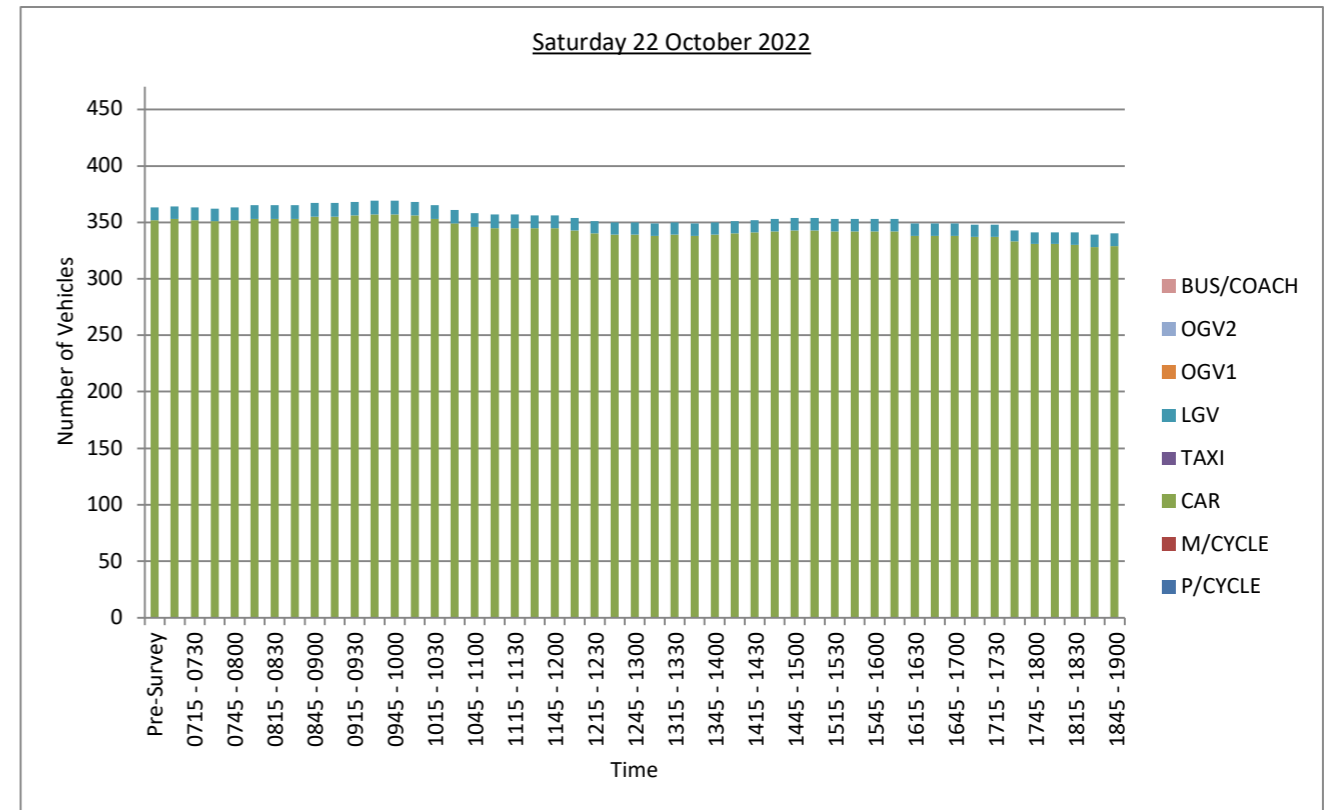
<b>Capacity</b>	
Normal	462
Disabled	8
<b>Total</b>	<b>470</b>

**Date**  
Saturday 22 October 2022

**Weather**  
Sunny Intervals  
Temp: 14°C

0700 - 1900 (Saturday 12H Session)

TIME	P/CYCLE	M/CYCLE	CAR	TAXI	LGV	OGV1	OGV2	BUS/COACH	TOTAL	PCU TOTAL	Capacity %
Pre-Survey	0	0	352	0	11	0	0	0	363	363.00	77.23
0700 - 0715	0	0	353	0	11	0	0	0	364	364.00	77.45
0715 - 0730	0	0	352	0	11	0	0	0	363	363.00	77.23
0730 - 0745	0	0	351	0	11	0	0	0	362	362.00	77.02
0745 - 0800	0	0	352	0	11	0	0	0	363	363.00	77.23
0800 - 0815	0	0	353	0	12	0	0	0	365	365.00	77.66
0815 - 0830	0	0	353	0	12	0	0	0	365	365.00	77.66
0830 - 0845	0	0	353	0	12	0	0	0	365	365.00	77.66
0845 - 0900	0	0	355	0	12	0	0	0	367	367.00	78.09
0900 - 0915	0	0	355	0	12	0	0	0	367	367.00	78.09
0915 - 0930	0	0	356	0	12	0	0	0	368	368.00	78.30
0930 - 0945	0	0	357	0	12	0	0	0	369	369.00	78.51
0945 - 1000	0	0	357	0	12	0	0	0	369	369.00	78.51
1000 - 1015	0	0	356	0	12	0	0	0	368	368.00	78.30
1015 - 1030	0	0	353	0	12	0	0	0	365	365.00	77.66
1030 - 1045	0	0	349	0	12	0	0	0	361	361.00	76.81
1045 - 1100	0	0	346	0	12	0	0	0	358	358.00	76.17
1100 - 1115	0	0	345	0	12	0	0	0	357	357.00	75.96
1115 - 1130	0	0	345	0	12	0	0	0	357	357.00	75.96
1130 - 1145	0	0	345	0	11	0	0	0	356	356.00	75.74
1145 - 1200	0	0	345	0	11	0	0	0	356	356.00	75.74
1200 - 1215	0	0	343	0	11	0	0	0	354	354.00	75.32
1215 - 1230	0	0	340	0	11	0	0	0	351	351.00	74.68
1230 - 1245	0	0	339	0	11	0	0	0	350	350.00	74.47
1245 - 1300	0	0	339	0	11	0	0	0	350	350.00	74.47
1300 - 1315	0	0	338	0	11	0	0	0	349	349.00	74.26
1315 - 1330	0	0	339	0	11	0	0	0	350	350.00	74.47
1330 - 1345	0	0	338	0	11	0	0	0	349	349.00	74.26
1345 - 1400	0	0	339	0	11	0	0	0	350	350.00	74.47
1400 - 1415	0	0	340	0	11	0	0	0	351	351.00	74.68
1415 - 1430	0	0	341	0	11	0	0	0	352	352.00	74.89
1430 - 1445	0	0	342	0	11	0	0	0	353	353.00	75.11
1445 - 1500	0	0	343	0	11	0	0	0	354	354.00	75.32
1500 - 1515	0	0	343	0	11	0	0	0	354	354.00	75.32
1515 - 1530	0	0	342	0	11	0	0	0	353	353.00	75.11
1530 - 1545	0	0	342	0	11	0	0	0	353	353.00	75.11
1545 - 1600	0	0	342	0	11	0	0	0	353	353.00	75.11
1600 - 1615	0	0	342	0	11	0	0	0	353	353.00	75.11
1615 - 1630	0	0	338	0	11	0	0	0	349	349.00	74.26
1630 - 1645	0	0	338	0	11	0	0	0	349	349.00	74.26
1645 - 1700	0	0	338	0	11	0	0	0	349	349.00	74.26
1700 - 1715	0	0	337	0	11	0	0	0	348	348.00	74.04
1715 - 1730	0	0	337	0	11	0	0	0	348	348.00	74.04
1730 - 1745	0	0	333	0	10	0	0	0	343	343.00	72.98
1745 - 1800	0	0	331	0	10	0	0	0	341	341.00	72.55
1800 - 1815	0	0	331	0	10	0	0	0	341	341.00	72.55
1815 - 1830	0	0	330	0	11	0	0	0	341	341.00	72.55
1830 - 1845	0	0	328	0	11	0	0	0	339	339.00	72.13
1845 - 1900	0	0	329	0	11	0	0	0	340	340.00	72.34







FAO Matthew Easton  
Aberdeen City Council

Via Email

ABZ Ref: ABZ3014

20<sup>th</sup> January 2022

Dear Matthew

**Ref: 211759/DPP Re-surfacing of site to form airport car park including change of use at Land Off Dyce Avenue Aberdeen**

I write in relation to the above application. The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We, therefore, have no objection to this proposal.

Please note that this response is on behalf of Aberdeen Airport as a statutory consultee and reflects our position with regards to aerodrome safeguarding only. It is without prejudice to any other representations Aberdeen Airport may wish to make regarding this proposal.

Yours Sincerely



Kirsteen MacDonald

Safeguarding Manager  
Aberdeen Airport  
07808 115 881  
[abzsafeguard@aiairport.com](mailto:abzsafeguard@aiairport.com)

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Matthew Easton  
Planning Department  
Aberdeen City Council  
Marischal College  
Aberdeen  
AB10 1AB

**By email only to: [measton@aberdeencity.gov.uk](mailto:measton@aberdeencity.gov.uk)**

23 December 2021

Dear Mr. Easton,

**PROPOSED RE-SURFACING OF SITE TO FORM AIRPORT CAR PARK INCLUDING  
CHANGE OF USE AT LAND OFF DYCE AVENUE ABERDEEN AB21 0BH.  
REF.: 211759/DPP**

This response is written on behalf of Aberdeen International Airport Limited (AIA). AGS Airports Limited is the owner and operator of AIA.

Passenger and staff surface transport is one of the greatest sources of airport related carbon emissions. Increasing the proportion of people who access the airport by more sustainable modes is vitally important to help reduce emissions and achieve the Scottish Government's net zero emissions objectives. Through the airport masterplan, surface access and carbon management strategies, AIA works with partners to promote more sustainable surface transport choices in a co-ordinated manner.

The development of unfettered car parking in isolation from a balanced sustainable transport strategy significantly undermines policy objectives by encouraging unsustainable private vehicle use. In particular, we would highlight the Scottish Government Climate Change Plan Update commitment to reduce car kilometres by 20% by 2030.

Several drawings submitted as part of the planning application incorporate land owned by AIA. These include the Landscape Masterplan (P21-2232.001), Site Layout (001) and Red Line Boundary (002). We also note in this respect that the Land Ownership Certificate erroneously certifies The Hub (NW) Limited as the sole owner of the site.

AIA wishes to make it clear that it has had no prior discussion with the applicant, is not involved in the proposed development and does not support the current planning application.

Specifically, AIA would highlight that the proposed pedestrian access is partially within AIA owned land. The applicant does not have rights to take access over this land and AIA has no intention of granting any rights.

As such, and in contrast to claims in the applicant's Planning and Transport Statements, existing pedestrian routes from the site to the terminal via Dyce Avenue would be over 1.5km. This is not a credible proposition and would necessitate a shuttle bus operation similar to the Airport long stay car park located 150m to the northwest of the application site (noting that the proposed site shuttle bus access would be longer via Dyce Avenue and would interact with the busy Dyce Drive/Argyll Road junction). Any permission justified on a shuttle bus operation would need to be supported by an appropriate condition to maintain operation and public safety.

The application has asserted that there is a current under provision of car parking capacity which will be exacerbated by future growth outlined in AIAs 2013 Masterplan, and which this application addresses by providing additional car parking capacity. This is a misdirection of policy and facts:

- AIAs long stay 'Park and Depart' car park is not closed –it is in temporary use as a Government Testing Centre as part of the response to the Covid-19 pandemic. AIA can serve 20 days' notice to terminate the agreement and reopen it as a car park. There is a management contract between AIA and APCOA for the management of the car park.
- The 2013 Masterplan recognises the need for growth that is “*sustainable*” and “*achieves modal shift*” in relation to surface access. The proposed development does not form part of the Airport Masterplan and does not contribute to achieving sustainable growth or modal shift.
- There is no policy justification for future growth to be accompanied by the 'predict and provide' approach to car parking advocated by the proposed development. AIA is working with Nestrans and other partners through, for example, the Aberdeen Rapid Transit project to facilitate sustainable surface access to the airport. The current application conflicts with sustainable growth and net zero objectives.

AIA therefore objects to this planning application for these reasons and on the following grounds:

**1) The proposed development does not accord with the Development Plan.**

Paragraph 7.2 of the Approved 2020 Aberdeen City and Shire Strategic Development Plan (SDP) states:

*“Future development should not be allowed to limit the growth of the economy by making the City Region less attractive to business, particularly in relation to congestion and access to roads, ports, airports and rail facilities. This infrastructure needs to be protected and improved..”*

The SDP also states:

*“Local Development Plans must where practicable protect all Employment Land Allocations from other uses.”*

The majority of the proposed site is designated as business and industrial land by the Adopted 2017 Aberdeen City Local Development Plan (LDP) proposals map to which Policy B1 applies. Policy B1 states:

*“Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types.”*

Policy B1 does make provision for other supporting uses:

*“Facilities that directly support business and industrial uses may be permitted where they enhance the attraction and sustainability of the city’s business and industrial land. Such facilities should be aimed primarily at meeting the needs of businesses and employees within the business and industrial area.”*

Paragraph 3.56 provides some context to Policy B1:

*“Maintaining a ready supply of employment land in the right places is vital to Aberdeen retaining its position as a competitive and sustainable business location.”*

This is expanded with particular relevance to this site by paragraph 3.58:

*“In addition to the provision of new sites, it is important to safeguard the supply of existing industrial and business land throughout the city from other development pressures. This is particularly important for sites in strategic locations and those with*

*good accessibility including **Aberdeen International Airport** [emphasis added], Aberdeen Harbour and the city centre.”*

The proposed development of an ‘airport car park’ does not fall within the descriptions of business or employment uses and it does not protect or improve access. The application fails to identify any beneficial employment or economic impacts. The proposed use will not enhance the attraction of the area and conflicts with sustainability objectives. It is respectfully suggested that the proposed development is therefore contrary to Policy B1 and related SDP provisions.

Policy B4 - Aberdeen Airport applies to land in the vicinity of the application site and is referenced by the applicant’s Planning Statement. Policy B4 states:

*“Within the area zoned for the Airport on the Proposals Map, there will be a presumption in favour of compatible uses which are required for the effective and efficient operation of the airport, and which have a functional requirement to be located there. This may include administrative offices, warehousing, distribution facilities, car hire facilities and **car parks** [emphasis added]. Other airport-related uses such as hotels will be treated on their merits.”*

The proposed development is not located within the area zoned for the Airport on the Proposals Map. Paragraph 3.67 of the text accompanying Policy B4 states:

*“The airport has ambitious plans to expand and upgrade its facilities to meet demand from growing passenger numbers, set out in the Aberdeen International Airport Masterplan 2013. However, they anticipate that **the majority of future growth will be on land already in use by the airport** [emphasis added].”*

The Airport Masterplan includes provisions for additional car parking capacity to be achieved in a sustainable manner as part of a co-ordinated approach to surface access. This has been demonstrated previously, for example A8/1867 (erection of car park deck) and P131866 (Creation of a 511 space surface car park).

The proposed development does not accord with the Airport Masterplan and Policy B4.

Policy T2 is concerned with managing the transport impact of development. It states:

*“...new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximize opportunities for sustainable and active travel...Where sufficient sustainable transport links to and from new developments are not in place, developers will be required to provide such facilities...”*

The related policy T3 states:

*“New developments must be accessible by a range of transport modes, with an emphasis on active and sustainable transport, and the internal layout of developments must prioritise walking, cycling and public transport penetration.”*

Permitting the proposed development would compromise the ability to minimise traffic generated by the airport and makes no contribution to encouraging more sustainable travel choices. The application has proposed pedestrian facilities that are not deliverable and has not provided any evidence as to how opportunities for sustainable and active travel have been maximized. It therefore does not accord with policies T2 or T3.

## 2) The application conflicts with other material considerations.

Paragraph 284 of Scottish Planning Policy (SPP) seeks a co-ordinated approach to achieving more sustainable patterns of airport related travel by requiring planning

authorities, airport operators and other stakeholders to work together to address planning and transport issues relating to airports including:

*“surface transport access for supplies, air freight, staff and passengers, related on- and off-site development such as transport interchanges, offices, hotels, car parks, warehousing and distribution services, and other development benefiting from good access to the airport.”*

Neither the LDP, airport masterplan nor ASAS include the proposed site as a required or appropriate location for airport related parking. The application conflicts with the requirements of SPP as it is based on unsustainable patterns of airport related travel and has not been developed in co-ordination with any of the relevant organisations or through any of the relevant policy documents.

AIA has reviewed the Proposed Aberdeen City Local Development Plan (2020) and consider it to be consistent with the relevant policies of the adopted LDP. It is respectfully suggested that the proposed development will therefore remain contrary to the Development Plan once the Proposed Plan is adopted.

As stated, the proposed development is based on a false premise that pedestrian access can be provided to the airport terminal. In fact, the development, if delivered would require a similar shuttle bus to that in operation at AIAs long stay car park located approximately 150m northwest of the application site.

The assumed alternative pedestrian route via Dyce Avenue involves travelling a distance of over 1.5km, with limited weather protection and several busy road crossings. It is unclear how such a proposal would comply with the requirements of the Equalities Act 2010.

In addition to the above, AIA would like to clarify references in the applicant’s Planning Statement to a Local Review Board decision for an unrelated development. AIA disputes the assertion that the outcomes of that application support the current application, in particular:

- *The appeal site was conveniently located and would not require shuttle transfers* – The application is based on an undeliverable pedestrian access proposal for which access rights do not exist and will not be granted. No alternative feasible route is apparent. The applicant’s assertion that the site is within 650m of the airport terminal for pedestrian access should be disregarded.
- *The closure of the existing long-stay airport car park* – the airport long stay car park is not closed. Due to the on-going global pandemic it is in temporary/emergency use as a Government Covid-19 Test Centre. Provisions are in place for the airport car park to revert to its original use at the appropriate time.

Finally, we note the applicant’s Planning Statement describes the proposed development as: “Full planning application for the formation of a surface airport car park including EV charging provisions”. This differs from the description above taken from the Council’s online planning system for “Proposed re-surfacing of site to form airport car park including change of use”, suggesting the site has been surfaced to some degree at some time.

No evidence has been provided that the proposed site has ever been surfaced and AIA has been unable to identify historic records showing any previous development on the site (the applicant’s Planning Statement refers to ‘an undeveloped plot’ at 2.1). The Council may wish to consider the development description, but in any event the application should be considered as new development.

Please do not hesitate to contact me on 07500 102 225 or at [ross.nimmo@agsairports.co.uk](mailto:ross.nimmo@agsairports.co.uk) should you have any queries or wish to discuss any of the points raised in this objection in more detail.

Yours sincerely



Ross Nimmo MRTPI  
**Head of Planning and Development**

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Matthew Easton  
Planning Department  
Aberdeen City Council  
Marischal College  
Aberdeen  
AB10 1AB

**By email only to: measton@aberdeencity.gov.uk**

01 July 2022

Dear Mr. Easton,

**PROPOSED RE-SURFACING OF SITE TO FORM AIRPORT CAR PARK INCLUDING CHANGE OF USE AT LAND OFF DYCE AVENUE ABERDEEN AB21 0BH – AMEDNED APPLICATION.**

**REF.: 211759/DPP**

This response is written on behalf of Aberdeen International Airport Limited (AIA). AGS Airports Limited is the owner and operator of AIA.

Thank you for bringing the amended application to our attention. AIA has considered the proposed amendments and held a short meeting with the applicant. AIA continues to object. With reference to our previous grounds for objection from 23 December 2021 (which we consider are still applicable), we would make the following additional observations:

- Despite claims that the proposed development is now intended for general use, the amended Transport Statement continually refers to the development as an 'off airport car park'. The Transport Statement demand section (2.5) still takes a predict and provide approach based on future airport passenger forecasts which is not in accordance with local, regional or national policies. 4.1 of the submitted 'Operational Strategy' proposes to operate a shuttle bus: "*to take passengers parking at the car park to Aberdeen International Airport*". It is apparent that the applicant anticipates the proposed development operating as an airport car park and any change of wording in the amended application description does not reflect any meaningful change to what is proposed and how the application should therefore be determined.
- Operating a shuttle bus with a 30 minute frequency for a 274 space car park as suggested in the Operational Strategy is not commercially viable. As such, it would be inadvisable to rely on future provision of a shuttle bus to make the proposal acceptable or sustainable in planning terms.
- The amended application has removed previous references to pedestrian access and is now silent on the subject, exacerbating conflict with Policies T2 and T3.

We can also confirm that the use of AIAs long stay 'Park and Depart' car park temporary use as a Government Testing Centre has ceased and preparations are underway to re-open the facility. Please do not hesitate to contact me on 07500 102 225 or at ross.nimmo@agsairports.co.uk should you wish to discuss any of the points raised in this objection in more detail.

Yours sincerely



Ross Nimmo MRTPI  
**Head of Planning and Development**

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# Comments for Planning Application 211759/DPP

## Application Summary

Application Number: 211759/DPP

Address: Land Off Dyce Avenue Aberdeen AB21 0BH

Proposal: Re-surfacing of site to form airport car park including change of use

Case Officer: Matthew Easton

## Customer Details

Name: Mr David Milne

Address: Dash Properties Limited 12 Westholme Avenue Aberdeen

## Comment Details

Commenter Type: Member of Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: Dear Sirs,

I represent Dash Properties Limited, owners of the Cairn Industrial Park site at Kirkhill, Dyce. Our site has operated via tenants as an airport 'Park and Ride' since 2003.

The applicant's proposal is on the basis there exists a requirement for additional car parking associated with Aberdeen International Airport.

In their Supporting Planning Statement CC SG P21-2232 section 5.0 'Planning Assessment' estimates a requirement for 6,902 parking spaces, with only 2,254 existing and 462 proposed spaces currently available. This suggests a significant shortfall in provision.

This is repeated in their Transport Statement 16-2043 T001 ISS 3 in particular sections 2.4 and 2.5 where detail of existing facilities are given. It is only here there is a single mention of our parking facility. It states '750 spaces' and 'permanently closed' which are both factually incorrect as follows:

- (i) The capacity of former operations peaked at a level approaching 1,400 vehicles. Namely the largest parking facility serving Aberdeen International Airport.
- (ii) The last tenant ceased trading in April 2020 due to the decimating impact of COVID-19 on air passenger traffic. However there have been ongoing discussions with five separate parties to restart parking operations.
- (iii) This has culminated in a lease currently being prepared for a new tenant to imminently

recommence parking operations at the site.

In summary, our facility has been entirely omitted from the proposal calculations and is therefore a significant exclusion when justifying parking demand in the locale.

I trust this information will be helpful, should you wish to discuss further please do not hesitate to get in touch.

Yours faithfully,

DAVID MILNE

Director,  
Dash Properties Limited.

# Comments for Planning Application 211759/DPP

## Application Summary

Application Number: 211759/DPP

Address: Land Off Dyce Avenue Aberdeen AB21 0BH

Proposal: Formation of a surface car park

Case Officer: Matthew Easton

## Customer Details

Name: Mr Keith Moorhouse

Address: Unit 6 Kirkhill Commercial Park Dyce Avenue, Dyce Aberdeen

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We write on behalf of Rentair Limited, the tenant at Unit 6, Dyce Avenue.

We are a provider of equipment and personnel to the energy services industry and require access to our yard by trucks and lorries on a daily basis.

We object on the basis that the existing road layout, with cars parked along the front of Expro Lion House and all along Dyce Avenue, is not designed to accommodate access to a 274 space car park with a shuttle bus operating.

We believe that the proposed car parking development will only add to an already unacceptable situation, where the existing parking arrangements for occupiers of premises in Dyce Avenue are insufficient, to the point that navigating into our premises can be difficult.

We would question whether anyone who currently parks on Dyce Avenue would pay to use the proposed car park. If that is correct, this will only mean more congestion with an increased risk of safety incidents, particularly with trucks and lorries moving in and out of our premises.

For all the above reasons, we object to the proposed car parking development.

We would be pleased to discuss this further with the case officer. Please contact our Keith Moorhouse, if that would be helpful.

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# Comments for Planning Application 211759/DPP

## Application Summary

Application Number: 211759/DPP

Address: Land Off Dyce Avenue Aberdeen AB21 0BH

Proposal: Re-surfacing of site to form airport car park including change of use

Case Officer: Matthew Easton

## Customer Details

Name: Mr Kevin Stephen

Address: 3 Thistle Road Dyce ABERDEEN

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My objection relates specifically to the proposed Pedestrian access onto Thistle road. TRAC owns the properties 3 & 4 Thistle road and the land between including the road and pavement areas directly across to the north west from this proposed pedestrian access/exit point. There is currently no pavement leading to this proposed exit point onto thistle road therefore the pedestrians would exit directly onto the roadway of Thistle road and have to cross onto a privately owned pavement area then cross the Vehicle entrance way to 3 Thistle road which is used by Cars & HGV's regularly. Or pedestrians will cross Thistle road diagonally in front of TRAC's entrance way to reach the far side pavement or finally will just walk down Thistle road on the actual roadway until they reach the pavement towards the bottom of thistle road. I would suggest an alternate Pedestrian exit/access point should be explored possibly to the North East corner heading down directly towards Forties Road behind number 2 Thistle Road.

Regards

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# Comments for Planning Application 211759/DPP

## Application Summary

Application Number: 211759/DPP

Address: Land Off Dyce Avenue Aberdeen AB21 0BH

Proposal: Formation of a surface car park

Case Officer: Matthew Easton

## Customer Details

Name: Mr Kevin Stephen

Address: 3 Thistle Road, Dyce Aberdeen

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Further to the revised plans submitted there now appears to be no direct practical pedestrian access route being provided to the airport from this development which will inevitably lead to informal short cuts being taken by users to gain a shorter walking route. This would result in trespass or fences being damaged.

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# Comments for Planning Application 211759/DPP

## Application Summary

Application Number: 211759/DPP

Address: Land Off Dyce Avenue Aberdeen AB21 0BH

Proposal: Re-surfacing of site to form airport car park including change of use

Case Officer: Matthew Easton

## Customer Details

Name: Mr Ross McLean

Address: 26 Rosemount Place Flat 5 Aberdeen

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Hello,

Unfortunately while I strongly support further development in Aberdeen City, providing additional car parking spaces makes very little sense and the arguments provided in the 'Transport Statement' are futile.

Figure 2.4 where 45% of journeys to the airport are with private car use, should be the primary indicator that we shouldn't be providing additional private car infrastructure. The ACC planning committee surely needs to take a stance here against promoting additional vehicles on the road, in line with the Scottish Government's NetZero initiative. While there is an argument that the new car park provides additional EV spaces, it's difficult to make an argument that these couldn't be retrofitted into an existing car park. Building an entirely new car park is overkill.

In order for this new car park to move forward, I'd like to see a strategy similar to the cities LEZ implemented. Where all vehicles entering the airport meet certain standards and if wishing to park, then must meet LEZ (or similar) criteria. Beside the obvious environmental benefits this will have it will drive more people into newer cars, driving our economy further forward along with the evolving technologies.

As a bonus, instead of investing in tarmac, invest in technologies where the Airport could become part of the national grid. If there are hundreds of cars parked. This seems like the obvious choice to partner with a manufacturer and an energy supplier in Aberdeen to test technology using parked EV's as a giant battery to balance our renewable grid, creating new revenue streams for the Airport. As an example, RGU are running a Regional Accelerator, invest in somebody's salary to run through that program instead of this!

I really hope to see some change here and this plan does not get approval to move forward in its current state.

Kind regards,  
Ross McLean :)

Lynsey McBain  
Aberdeen City Council  
Committee & Governance  
Old Town House,  
Broad Street  
Aberdeen  
AB10 1AQ

**By email only to: [lymcbain@aberdeencity.gov.uk](mailto:lymcbain@aberdeencity.gov.uk)**

22 December 2022

Dear Lynsey,

**PROPOSED FORMATION OF A SURFACE CAR PARK AT LAND OFF DYCE DRIVE,  
ABERDEN, AB21 0BH.  
REF.: 211759/DPP**

Thank you for your letter dated 21 December 2022 informing us of the referral of the above planning application decision to the Aberdeen City Council Local Review Body (LRB). This response is written on behalf of Aberdeen International Airport Limited (AIA). AGS Airports Limited is the owner and operator of AIA.

AIA continue to oppose the scheme as set out in our representations dated 23 December 2021 and 01 July 2022.

Furthermore, AIA wishes to draw the attention of the LRB to another planning application for 193 spaces (reference 221436/DPP) near the airport. If both proposals are allowed to proceed, that will represent a cumulative impact of 467 additional car parking spaces. Such a huge increase in incremental supply poses risks to the city's sustainable transport ambitions, notably Aberdeen Rapid Transit, and climate change targets.

The revised draft National Planning Framework 4 has also been published in the intervening period, with the proposed development potentially contrary to Policy 1 (Tackling the climate and nature crises) and Policy 13 (Sustainable transport).

The Council previously took the correct decision to protect valuable employment land and support sustainable transport. AIA respectfully requests that the LRB confirm that decision.

Please do not hesitate to contact me on 07500 102 225 or at [ross.nimmo@agsairports.co.uk](mailto:ross.nimmo@agsairports.co.uk) should you have any queries or wish to discuss any of the points raised in this objection in more detail.

Yours sincerely



Ross Nimmo MRTPI  
**Head of Planning and Development**

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P21-2232

18 January 2023

Local Review Body  
Aberdeen City Council  
Committee & Governance  
Old Town House,  
Broad Street  
Aberdeen  
AB10 1AQ

Dear Sir/Madam

**RE: Planning application 211759/DPP – Proposed Formation of a Surface Car Park at Land Off Dyce Drive, Aberdeen, AB21 OBH. Appeal to the Local Review Body. Response to Interested Party Comments.**

Pegasus write on behalf of The Hub (NW) Limited ('the Appellant') in response to a letter of objection submitted to the Aberdeen City Council Local Review Body (LRB) by AGS Airports Limited, on behalf of Aberdeen International Airport Limited (AIA), relating to the above Appeal. This letter was received by Pegasus on 5<sup>th</sup> January 2023.

The letter re-iterates the objection submitted by AGS to the above planning application, reference 211759/DPP, which is now the subject of this Appeal. The original objection is responded to in the submitted Appeal documents, particularly the Appeal Statement.

The letter also raises a number of new points for consideration by the Local Review Body, which we provide a response to below.

Firstly, AGS Airports Limited draw attention to a recently submitted planning application for the extension of the existing car park at International Gate, Dyce, Aberdeen (planning application reference: 221436/DPP), expressing concern about the cumulative impacts of that proposal with the proposal for Land at Dyce Avenue, the subject of this Appeal. As the application at International Gate is currently not approved, it falls outwith the proposals included within the demand analysis submitted with the Appeal, which is based on existing and approved parking provision providing certainty regarding future supply. Pegasus additionally note that each application should be determined on its' own merits; as the Appeal will be determined first, should the Appeal be successful and the proposed parking allowed, then any concerns about cumulative impacts should be addressed as part of the City Council's consideration of the proposal for International Gate.

It is also noted that the cover letter submitted to support the planning application at International Gate (application 221436/DPP, cover letter reference ref: 12439/05.01/LET.01/AS) states that since



opening, the surface car park at International Gate has operated with an occupational level of over 90%, therefore an extension is needed to provide additional parking spaces. It is submitted for consideration by the Local Review Body that this provides further evidence to support the case for this Appeal; as set out in the submitted Transport and Planning Statements and re-iterated in the Appeal Statement, there is a current and ongoing demand for car parking to serve Aberdeen International Airport which is not currently being addressed through existing or planned provision.

AGS Airports Limited's letter of objection secondly makes reference to the Revised Draft National Planning Framework 4 (NPF4), Policy 1: 'Tackling the climate and nature crises' and Policy 13: 'Sustainable Transport'.

Policy 13 has already been considered within the Appeal Statement submitted to the Local Review Body. As set out within the Statement, Policy 13 actively supports proposals which enhance multi-modal hubs, including proposals for EV charging infrastructure, highlighting the importance of EVs in achieving a modal shift towards sustainable transport modes. For the reasons set out at length in the submitted Appeal Statement, it is considered that the proposals are supported by Policy 13, as the proposals will enhance the availability of electric vehicle (EV) charging infrastructure and encourage the use of EV cars for journeys to the airport, aiding the shift towards more sustainable transport modes. The proposals are therefore in keeping with, and indeed supported by, Policy 13 of the Revised Draft NPF4. It is respectfully requested that the Local Review Body consider this position against the objection submitted by AGS Airports Limited.

In regard to Policy 1: 'Tackling the climate and nature crises', the policy intent is: *'To encourage, promote and facilitate development that addresses the global emergency and nature crisis'*, with a key policy outcome being that *"Emissions from development are minimised"*. It is submitted that the proposals achieve exactly this: encouraging, facilitating, and providing for a form of sustainable transport which assists in minimising emissions, i.e. assisting in a wholesale shift away from traditional fossil-fuelled vehicles to electric vehicles, as explained in the submitted Appeal Statement. The proposals therefore achieve the aims of Policy 1, contributing to Scotland's Zero Carbon target by encouraging and supporting the move away from traditional fossil-fuelled vehicles to electric vehicles, as set out in the submitted Appeal Statement.

Finally, the letter from AGS Airports Limited asks for members to *"protect valuable employment land and support sustainable transport"*. In regard to land use, it is demonstrated both in the Council's consideration of the planning application (please refer to the Officer's Report submitted with the Appeal), and the submitted Appeal Statement, that the proposed use is not in conflict with the existing policies to protect employment land. Indeed, it is set out in the Appeal Statement that the proposals assist in enhancing the sustainability of car travel associated with the surrounding business and industrial land, supporting these employment uses by providing for a more sustainable form of transport and EV charging, which will be required by those accessing both locations in the very near future as traditional fossil-fuelled vehicles are phased out.

In regard to supporting sustainable transport, it is submitted that the proposal does just that: as set out at length in the submitted Appeal Statement, the EV provision included in the proposal represents a significant benefit in the shift towards more sustainable form of transport, and it is





respectfully requested that the Local Review Body give adequate consideration and significant positive weighting to this in their determination of the Appeal.

We look forward to receiving the outcome of the Local Review Body's consideration of the Appeal in due course.

Yours sincerely,

Sophie Gooch

Associate Planner  
Sophie.gooch@pegasusgroup.co.uk

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## Application 211759/DPP

### Aberdeen Local Development Plan (ALDP) 2017

- Policy B1 (Business and Industrial Land)
- Policy B4 (Aberdeen Airport)
- Policy NE6 (Flooding, Drainage and Water Quality)
- Policy T2 (Managing the Transport Impact of Development)

[https://www.aberdeencity.gov.uk/sites/default/files/LDP\\_WS\\_20170328.pdf](https://www.aberdeencity.gov.uk/sites/default/files/LDP_WS_20170328.pdf)

### Proposed Aberdeen Local Development Plan (2020) / Aberdeen Local Development Plan 2022

- Policy B1 (Business and Industrial Land)
- Policy B3 (Aberdeen International Airport and Perwinnes Radar)
- Policy NE4 (Our Water Environment)
- Policy T2 (Sustainable Transport)
- Policy T3 (Parking)

<https://www.aberdeencity.gov.uk/services/planning-and-building/local-development-plan/aberdeen-local-development-plan/aberdeen-local-development-plan-review#3678>

### Supplementary Guidance

Transport and Accessibility

[Supplementary guidance and technical advice | Aberdeen City Council](#)

### Other Material Considerations

Scottish Planning Policy 2020

[Scottish Planning Policy - gov.scot \(www.gov.scot\)](https://www.gov.scot)

Revised Draft NPF4 - National Planning Framework

[Supporting documents - National Planning Framework 4: revised draft - gov.scot \(www.gov.scot\)](https://www.gov.scot)

Regional Transport Strategy

[Regional Transport Strategy | NESTRANS](#)

Local Transport Strategy

[Local transport strategy | Aberdeen City Council](#)

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Marischal College Planning & Sustainable Development Business Hub 4, Ground Floor North Broad Street Aberdeen AB10 1AB Tel: 01224 523 470 Fax: 01224 636 181 Email: pi@aberdeencity.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE            100541191-004

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant     Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Pegasus Group		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Sophie	Building Name:	Gainsborough House
Last Name: *	Gooch	Building Number:	34-40
Telephone Number: *	01919176700	Address 1 (Street): *	Grey Street
Extension Number:		Address 2:	
Mobile Number:	07881918641	Town/City: *	Newcastle upon Tyne
Fax Number:		Country: *	United Kingdom
		Postcode: *	NE1 6AE
Email Address: *	sophie.gooch@pegasusgroup.co.uk		

Is the applicant an individual or an organisation/corporate entity? \*

Individual     Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text" value="c/o Agent"/>
First Name: *	<input type="text"/>	Building Number:	<input type="text"/>
Last Name: *	<input type="text"/>	Address 1 (Street): *	<input type="text" value="c/o Agent"/>
Company/Organisation	<input type="text" value="The Hub (NW) Limited"/>	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	<input type="text" value="c/o Agent"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="United Kingdom"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="NE1 6AE"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="sophie.gooch@pegasusgroup.co.uk"/>		

## Site Address Details

Planning Authority:	<input type="text" value="Aberdeen City Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="DYCE FARM"/>
Address 2:	<input type="text" value="A B Z BUSINESS PARK"/>
Address 3:	<input type="text" value="INTERNATIONAL AVENUE"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="ABERDEEN"/>
Post Code:	<input type="text" value="AB21 0BH"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="811728"/>	Easting	<input type="text" value="387759"/>
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## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

Formation of a surface car park.

## Type of Application

What type of application did you submit to the planning authority? \*

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? \*

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Please refer to the Planning Appeal Statement of Reasons (Ref. P21-2232 Dated December 2022)

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

Yes  No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)

Parking surveys are included with the Transport Statement of Case (Ref.16-2043 Dated December 2022). These could not be undertaken to support the Proposal at the time of the planning application due to the ongoing effect of the Covid-19 pandemic, which was affecting the number of people travelling to work and via the Airport. It is considered that travel patterns are almost, if not entirely, back to a 'new normal' now which has enabled surveys to be undertaken.

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

Planning Appeal Statement of Reasons (Ref. P21-2232 December 2022) and appended original planning application documents; Transport Statement of Case (Ref. 16-2043 December 2022); Delegated Decision Notice 211759/DPP; Officers Report of Handling 211759/DPP; Appeal Decision APP/F1610/W/20/3248674

## Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

211759/DPP

What date was the application submitted to the planning authority? \*

14/12/2021

What date was the decision issued by the planning authority? \*

21/09/2022

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

Yes  No

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

Yes  No

Is it possible for the site to be accessed safely and without barriers to entry? \*

Yes  No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

Yes  No

Have you provided the date and reference number of the application which is the subject of this review? \*

Yes  No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

Yes  No  N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

Yes  No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

Yes  No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.



## **Declare – Notice of Review**

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mr Kieran McFarlane

Declaration Date: 20/12/2022

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# Planning Statement of Reasons

Appeal to Aberdeen City Local Review Body

In Respect of 211759/DPP: Formation of a Surface Car Park

Land off Dyce Avenue, Aberdeen, AB21 0BH

On behalf of The Hub (NW) Limited

Date: 19 December 2022 | Pegasus Ref: P21-2232

Authors: Kieran McFarlane | Sophie Gooch





## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	19.12.2022	KM   SG	HM	-



## Contents.

1. Introduction.....	1
2. The Appeal Site and Planning History .....	4
3. The Proposal .....	6
4. Planning Policy Context .....	8
5. Grounds of Appeal .....	16
6. Conclusion.....	29

## Appendices contents.

Appendices .....	31
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# 1. Introduction

- 1.1. This Planning Statement of Reasons has been prepared by Pegasus Group on behalf of The Hub (NW) Limited (the Appellant), in support of their application for Planning Permission for a surface car park (the Proposal) at land off Dyce Avenue, Aberdeen, AB21 OBH (the Appeal site).
- 1.2. The appeal has been lodged in response to the refusal of the planning application (211759/DPP) by Aberdeen City Council ('the Council') on 21 September 2022, for a proposal comprising:  
  
*'Formation of a surface car park.'*
- 1.3. As set out in the submitted application documents, the surface car park is proposed to provide electric vehicle (EV) charging and car parking for passengers travelling via Aberdeen International Airport (long-stay parking) and spaces for users of neighbouring businesses in Kirkhill Industrial Estate.
- 1.4. The application was amended following the initial consultation period, whereby comments from consultees querying the sustainability of the proposal were received. These comments related to whether the Proposal would encourage people to drive to Aberdeen International Airport, which would be contrary to policies encouraging the use of other more sustainable modes of transport.
- 1.5. The Appellant recognises the comments made in relation to sustainability, and acknowledges the general view that travel to the Airport (and elsewhere) by private car should not be encouraged. However, the Appellant also acknowledges that EV charging provision and car parking provision is required both for Aberdeen International Airport, and Kirkhill Industrial Estate, as set out in evidence submitted with the application (in particular the Transport Statement) and discussed in more detail in Section 5 of this Statement.
- 1.6. For this reason, the Appellant aims to develop a car parking model which leads the way for EV parking provision. As the UK moves towards ending the sale of new petrol and diesel cars and vans by 2030, with all new cars and vans being fully zero emission from 2035, the Appellant recognises that now is the time for a modal shift away from typical car parking provision. The Proposal has therefore been developed to provide mechanisms which incentivise EV drivers and provide charging opportunities well beyond any current existing or known planned provision.
- 1.7. The Proposal is described in full in Section 3.0 of this Statement, however in summary the Proposal will:
  - double existing EV charging capacity (6 existing and 12 planned charging points in the immediate vicinity), providing an additional 18 charging points on opening;
  - more than quadruple existing provision in the long term, providing 42 passive EV spaces where cabling is to be provided for future charging points;
  - incentivise EV drivers with 70 spaces reserved exclusively for EVs; and

- provide recharge facilities for EV drivers, whereby there will be at least one dedicated fulltime member of staff to facilitate charging opportunities: enabling drivers to leave their keys with staff, who will then be able to charge EVs on their behalf. The intention is to allow owners to return to their vehicle with a full charge, ready to drive.

1.8. Notwithstanding the amendments that were made during the course of the application, the application was refused on the following grounds, with no weight afforded to the provision of EV charging:

1. *That the provision of a stand-alone car park, accessible to anyone who works in Kirkhill, would encourage people to drive to the area, which is inconsistent with policies, including the Transport and Accessibility Supplementary Guidance, which are designed to encourage modal shift to more sustainable means of transport such as public transport options.*
2. *That the proposal would be contrary to Policy B1 Business and Industrial Land, as although a car park in itself is not entirely inconsistent with the land use zoning, when considered in the round alongside transportation policies and the intended purpose related to Aberdeen International Airport, it would not enhance the sustainability of the related business and industrial land.*
3. *That it is considered that even as parking were restricted to airport users, the provision of additional car parking capacity near the airport would hinder the ability to encourage modal shift towards the use of public transport. There is no evidence of capacity issues with the existing level of parking available to those using the airport. Any additional supply will make driving to and parking at the airport more attractive. This would be inconsistent with the aims of Scottish Planning Policy, the Regional Transport Strategy, Local Transport Strategy and Policies T2 (Managing the Transport Impact of Development) and T3 (Sustainable and Active Travel) of the Aberdeen Local Development Plan 2017.*

1.9. The full grounds of appeal are set out in Section 5 of this Appeal Statement, with accompanying transport evidence provided in the separate Transport Statement of Case. However, in summary, it is submitted that the reasons for refusal be overturned and planning permission granted for the following Reasons:

1. The proposal assists in achieving a modal shift from fossil-fuelled cars to electric vehicles, providing a notable proportion of charging facilities to support Scotland's aim for all vehicles to be fossil-free by 2030. Policies T3 of the Adopted Aberdeen Local Development Plan (ALDP) and T2 of the Proposed ALDP support initiatives for alternative fuelled vehicles where appropriate, for example in circumstances where people need to travel by private car, which is demonstrated to be the case in this Statement. Policy 13 of the Revised Draft NPF4 goes on to actively support proposals which enhance multi-modal hubs, including proposals for EV charging infrastructure, highlighting the importance of EVs in achieving a modal shift towards sustainable transport modes.
2. The proposal is consistent with *Policy B1 Business and Industrial Land* in terms of land use zoning and, in relation to the evidence supporting Reasons 1 and 3 above and below, assists in enhancing the sustainability of car travel associated with the surrounding business and industrial land. It is therefore in keeping with Policy B1 and



supporting sustainable transport policies, including Policy T3 of the Adopted ALDP and Policy T2 of the Proposed ALDP.

3. A proportion of passengers will always access the Airport by car; whilst there is some uncertainty regarding passenger numbers given the impact of the recent Covid-19 pandemic on airport travel, it remains the case that adopted policy, as set out in NPF3 paragraphs 5.20, 5.22 and 5.23, and emerging policy, as set out in NPF4, supports and encourages the future growth of the Airport, and adequate parking and EV charging facilities need to be provided to accommodate the associated increase in passenger numbers.

- 1.10. The following sections of this Appeal Statement summarise the Appeal Site and planning history (Section 2), outline the Proposal (Section 3), and set out the planning policy background and other relevant material considerations relating to the Proposal (Section 4), before outlining the above Reasons for refusal and setting out the supporting evidence for the grounds of appeal in full (Section 5).



## 2. The Appeal Site and Planning History

### The Appeal Site

- 2.1. The Appeal Site extends to 0.69 hectares within Aberdeen Business Park, forming part of the wider Kirkhill Industrial Estate which lies adjacent to Aberdeen International Airport ('the Airport'). The site is situated to the north-east of Dyce Avenue, which provides access at the south-western end of the Site, and east of Thistle Road (see Figure 1 below).

**Figure 1 – Site Location**



- 2.2. The surrounding area is largely characterised by commercial units forming Aberdeen Business Park. Aberdeen International Airport staff car park lies adjacent to the eastern boundary of the Site, with Aberdeen International Airport terminal itself situated approximately 500m to the north-east, and Thistle Road/ Dyce Road lie to the north and west.
- 2.3. In relation to site constraints the Site is located within Flood Zone 1, therefore there is a low likelihood of flooding at this location. There are no sensitive environmental or other designations on or near to the site which would need to be considered as part of the planning strategy.

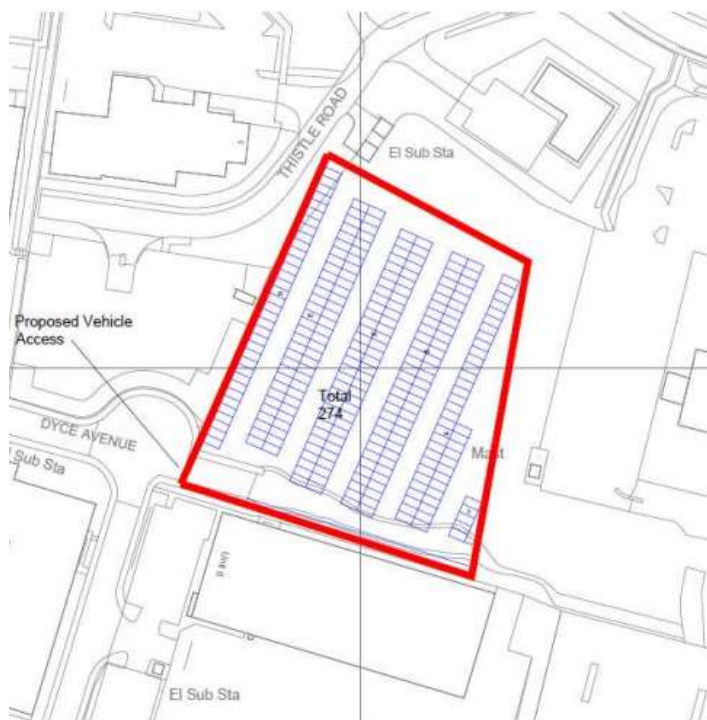
## Planning History

- 2.4. Following a desk-based review of Aberdeen City Council's online planning register it has been established that no previous planning applications relate to the Site itself.
- 2.5. That said, it is noteworthy that a planning application (reference 191456/DPP) for a car park at International Gate, Dyce, for 462 parking spaces was recently approved via the Local Review Body on appeal on 14 October 2020. A review of the appeal documents confirms that the following points were acknowledged in support of the proposal and ultimately led to the appeal being allowed:
- Whilst the need to facilitate modal shift was acknowledged, it was also noted that not all users can access the Airport using existing public transport connections, and there remains a need to ensure an adequate supply of onsite parking and choice;
  - There are economic benefits associated with having a readily accessible Airport in the region;
  - The appeal site was conveniently located and would not require shuttle transfers;
  - The closure of the existing long-stay Airport car park means that 740 spaces no longer exist: members considered that by providing 462 spaces, the appeal proposal would ensure that an adequate supply is maintained, preventing any shortage from adversely affecting nearby commercial premises and residential streets due to an overspill of airport parking demand;
  - The opening of new car parks in recent years has not precluded a growth in the use of public transport; and
  - Support for Electric Vehicle (EV) charging points, of which 12 no. were proposed.

### 3. The Proposal

- 3.1. A planning application for the proposed surface car park was submitted to Aberdeen City Council on 14<sup>th</sup> December 2021, with amended proposals submitted on 7<sup>th</sup> June 2022. The application was submitted in full and following the amendments now proposes the formation of a surface car park to serve Aberdeen International Airport and businesses within the adjacent Kirkhill Industrial Estate through the provision of parking spaces (long-stay parking options are proposed for Airport users) and EV charging points.
- 3.2. The proposed layout of the car park is illustrated in Figure 2 below:

**Figure 2 – Proposed Site Layout**



- 3.3. As set out in the submitted application documents, the Proposal includes the following:
- Up to 274 parking spaces;
  - 18 active electric vehicle (EV) charging points;
  - 42 passive EV spaces, where cabling is to be provided for future charging points;
  - A total of 70 spaces reserved exclusively for EVs;
  - Vehicular and pedestrian access via Dyce Avenue;
  - An Electric Shuttle Bus providing half-hourly access to and from Aberdeen International Airport;



- Security measures including barriers, CCTV, ANPR (Automatic Number Plate Recognition) and fencing; and
- 12 no. disability spaces.

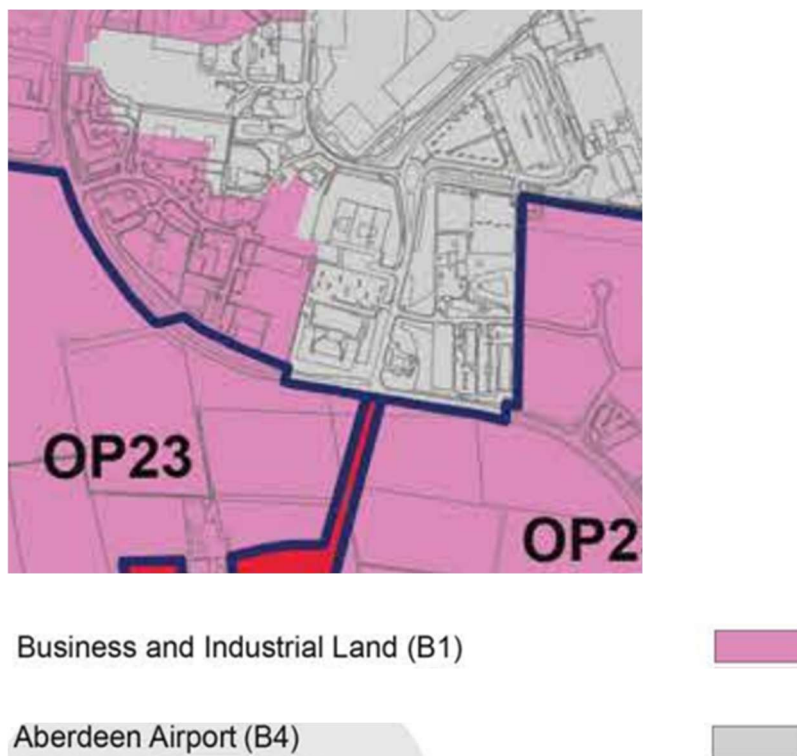
## 4. Planning Policy Context

- 4.1. The current development plan comprises the Aberdeen Local Development Plan 2017 (Adopted ALDP). As this was adopted in January 2017 it has, since submission of the application in December 2021, become out of date. Meanwhile, the Proposed Aberdeen Local Development Plan 2020 (Proposed ALDP) was submitted to the Scottish Government Planning and Environmental Appeals Division for Examination in Public, on 22 July 2022.
- 4.2. Policies in the Proposed ALDP can therefore be afforded weight depending on whether representations relating to those Policies have been received; and what those representation state in relation to the Proposal. In the round, those policies of relevance to the Proposal, and particularly to the reasons for refusal, take the same stance as current policy in the Adopted ALDP. However, any notable updates in the Proposed ALDP are referenced below and in Section 5 in relation to the grounds of appeal, where relevant, given that it is now the Council's settled view on where and how development should take place in future years. It is considered that some weight can now be afforded to the Proposed ALDP because of this, particularly in relation to the policies subject of this appeal; whilst some representations have been received to some of these policies, these have been reviewed by the Inspector and no modifications have been proposed that would affect the way these policies are interpreted or applied to the determination of the Appeal.
- 4.3. Other material considerations include the National Planning Framework 3 (NPF3), published in June 2014 and the supporting policies set out in Scottish Planning Policy (SPP), also published in 2014. It is considered that some weight can now be afforded to the National Planning Framework 4 (NPF4), as the Revised Draft National Planning Framework was laid before the Scottish Parliament for approval on 8 November 2022. Whilst national policy of relevance in the determination of this Appeal therefore reflects that in the Planning Statement submitted with the application, reference to NPF4 has been added below for consideration in this Appeal, given it is now at a more advanced stage prior to adoption.

### **Adopted Aberdeen Local Development Plan**

- 4.4. As set out in the Planning Statement submitted with the application subject of this Appeal, the Site forms part of a wider allocation under Policy B1 (Business and Industrial Land) of the Adopted ALDP, and immediately adjacent to the Aberdeen Airport Zone, which is subject to Policy B4, as shown in Figure 3 below:

**Figure 3 – Extract of the Aberdeen Local Development Plan Proposals Map 2017**



- 4.5. The following Adopted ALDP policies were identified in the Report of Handling as relevant to the reasons for refusing the application:
- Policy B1 (Business and Industrial Land)
  - Policy B4 (Aberdeen Airport)
  - Policy T2 (Managing the Transport Impact of Development)
  - Policy T3 (Sustainable and Active Travel)
- 4.6. Other policies were also identified in the Report of Handling and in the Planning Statement, but are not re-iterated here as they are not relevant to the reasons for refusal or the grounds of this Appeal.

**Policy B1 – Business and Industrial Land**

- 4.7. The Site forms part of a wider allocation under Policy B1 (Business and Industrial Land) of the Adopted ALDP as shown in Figure 4.1. The policy states:

*“Aberdeen City Council will in principle support the development of the business and industrial land allocations set out in this Plan. Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types. Other uses which may be suited to a business and industrial location, such as car showrooms and bus depots, shall be treated on their own merits. The expansion of existing concerns and uses within these locations will be permitted in principle.”*

*"Facilities that directly support business and industrial uses may be permitted where they enhance the attraction and sustainability of the city's business and industrial land. Such facilities should be aimed primarily at meeting the needs of businesses and employees within the business and industrial area."*

- 4.8. It has been established both through pre-application advice received in relation to the Proposal (reference 210942/PREAPP), and in the Report of Handling for the application, that whilst car parks are not explicitly referred to within Policy B1, it is considered that a car park could be consistent with the general purpose of this policy, as a car park is not a sensitive use which could be affected by surrounding industrial uses and would be in keeping with other car parks within the surrounding area.
- 4.9. It is also the case that the recent planning application (reference 191456/DPP) for a car park at International Gate, Dyce, for 462 parking spaces, which was approved via the Local Review Body on appeal on 14 October 2020 is located in a B1 Zone. In that Case when determining the application the Case Officer concluded that *"The use would sit comfortably alongside the existing uses...It would therefore not be unusual or unreasonable to find such a use within a business park adjacent to an airport"* (191456/DPP Report of Handling p.4).
- 4.10. The Proposal is therefore considered to be in keeping with Policy B1 in terms of the proposed use. Compliance with the second part of Policy B1, in terms of enhancing the sustainability of the City's business and industrial land (including the Airport) is discussed further in Section 5 below, in relation to the Council's second reason for refusal.

#### **Policy B4 – Aberdeen Airport**

- 4.11. The Application Site also lies immediately adjacent to the Aberdeen Airport Zone, which is subject to Policy B4 of the Adopted ALDP. Policy B4 sets out that:
- "Within the area zoned for the Airport on the Proposals Map, there will be a presumption in favour of compatible uses which are required for the effective and efficient operation of the airport, and which have a functional requirement to be located there. This may include administrative offices, warehousing, distribution facilities, car hire facilities and carparks. Other airport-related uses such as hotels will be treated on their merits."*
- 4.12. In this zone there is thus a presumption in favour of compatible uses, including car parks. The site is immediately adjacent to this zone, and indeed immediately adjacent to the existing Airport staff car park. This should be considered in relation to the future demand for parking and EV charging demonstrated in the Transport Statement submitted with the Application and the Transport Statement of Case submitted with this Appeal; sites such as the Appeal Site, in close proximity to the Airport Zone, are considered to be well-placed to meet the ongoing future demand for car parking and EV charging to serve the Airport.
- 4.13. Overall, it is considered that the development would integrate with the existing uses in the area and would not be adversely affected by the neighbouring industrial uses or noise generated by Aberdeen International Airport. It is therefore considered that the proposals are in line with Policy B4.

## Policy T2 – Managing the Transport Impact of Development

4.14. Policy T2 states:

*“Commensurate with the scale and anticipated impact, new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel.”*

4.15. The proposals are not expected to generate increased traffic, but rather serve an existing and, as set out in the Transport Statement submitted with the application and accompanying Transport Statement of Case submitted with this Appeal, a future demand both for parking and for EV charging facilities. The availability of EV charging points within the site will also increase the availability of sustainable travel options in the area, especially in comparison to similar long stay car parks serving the airport which do not currently offer EV charging on a wide scale. This is explained in more detail in Section 5 of this Statement in relation to reasons for refusal 1 and 3, and supplemented by the Transport Statement of Case.

4.16. Policy T2 also states:

*“Where sufficient sustainable transport links to and from new developments are not in place, developers will be required to provide such facilities or a suitable contribution towards implementation.”*

4.17. The Appellant originally proposed that pedestrian access to the Airport would be achieved via a link along Thistle Road; a short walk for passengers. However, the landowner, AGS Airports confirmed that they would not provide access rights along Thistle Road. The Appellant therefore proposes an EV shuttle bus facility to shuttle passengers to and from the Airport at regular intervals; full details of this facility are set out in the Operational Strategy submitted with the planning application. This element of the proposal is considered to be in keeping with Policy T2 and contributes towards a sustainable shift away from traditional park and ride facilities.

## Policy T3 – Sustainable and Active Travel

4.18. Policy T3 states:

*“New developments must be accessible by a range of transport modes, with an emphasis on active and sustainable transport, and the internal layout of developments must prioritise walking, cycling and public transport penetration...”*

*...Recognising that there will still be instances in which people will require to travel by car, initiatives such as like car sharing, **alternative fuel vehicles** and Car Clubs will also be supported where appropriate” (Pegasus emphasis).*

4.19. The provision of EV charging to support alternatively fuelled (in this case electric) vehicles is an aspect which was not afforded weight in the Officer’s Report of Handling for the application subject of this Appeal. It is discussed in detail in Section 5 in relation to reason for refusal 1 and 3, in terms of the important step that EV charging provision represents in achieving a modal shift towards more sustainable forms of transport than the fossil-fuelled car, and in a location where it is considered impractical for all persons to travel by car. The Proposal is therefore in keeping with Policy T3.



## Proposed Aberdeen Local Development Plan

4.20. The following policies of the Proposed ALDP were identified in the Report of Handling as relevant to the reasons for refusing the application:

- Policy B1 (Business and Industrial Land)
- Policy B3 (Aberdeen International Airport)
- Policy T2 (Sustainable Transport)
- Policy T3 (Parking)

### Policy B1 – Business and Industrial Land

4.21. The same zonal approach as the Adopted ALDP is taken in the Proposed ALDP, with the Appeal site falling in the Policy B1 'Business and Industry' zone. Policy B1 largely re-iterates the policy adopted in the current version of the Aberdeen Local Development Plan (2017), stating:

*"The Council will, in principle, support the development of the business and industrial land allocations set out in this Plan. Land zoned for business and industrial uses on the Proposals Map, including already developed land, shall be retained for Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses and safeguarded from other conflicting development types. Other uses which may be suited to a business and industrial location, such as car showrooms and bus depots, shall be treated on their own merits. The expansion of existing uses within these locations will be permitted in principle..."*

*... Facilities that directly support business and industrial uses may be permitted where they enhance the attraction and sustainability of the city's business and industrial land. Such facilities should be aimed at meeting the needs of businesses and employees within the business and industrial area rather than the wider area."*

4.22. The discussion set out in Section 5 of this Statement relating to reason for refusal 2 addresses this policy requirement, in the same manner that Policy B1 of the Adopted ALDP is discussed. The Proposal is therefore considered to be in keeping with emerging Policy B1.

### Policy B3 – Aberdeen International Airport

4.23. As with the Adopted ALDP, the Appeal Site lies adjacent to the Aberdeen Airport Zone in the Proposed ALDP, which falls under Policy B3. That Policy is similar to the adopted version in Policy B4, and states:

*"Within the area zoned for the Airport on the Proposals Map, there will be a presumption in favour of compatible uses which are required for the effective and efficient operation of the airport, and which have a functional requirement to be located there. This may include administrative offices, warehousing, distribution facilities, car hire facilities and carparks. Other airport-related uses such as hotels will be treated on their merits."*

4.24. As set out in relation to Adopted ALDP Policy B4 above, the site is immediately adjacent to the Airport Zone and the Airport staff car park; as set out above the development would integrate with the existing uses in the area and would not be adversely affected by the neighbouring industrial uses or noise generated by Aberdeen Airport. It is therefore considered that the proposals are in line with emerging Policy B3.

## Policy T2 – Sustainable Transport

4.25. Policy T2 replicates the wording of policies T2 and T3 in the Adopted ALDP, stating:

*“Proportionate to the scale and anticipated impact, new developments must demonstrate that sufficient measures have been taken to minimise traffic generated. New developments must be accessible by a range of transport modes, with an emphasis on active and sustainable transport...”*

*...Where sustainable transport links to and from new developments are not in place, developers will be required to provide infrastructure to support such facilities or a suitable contribution towards implementation...*

*...Recognising that there will still be instances in which people will require to travel by car, initiatives such as car sharing, **alternative fuel vehicles** and Car Clubs will also be supported where appropriate.*

4.26. As set out above in relation to Adopted ALDP Policy T2, the proposals are not expected to generate increased traffic, but rather serve an existing and future demand. The availability of EV charging points within the site will also increase the availability of sustainable travel options in the area, especially in comparison to similar long stay car parks serving the Airport which do not currently offer EV charging on a wide scale. This is explained in more detail in Section 5 of this Statement in relation to reasons for refusal 1 and 3.

4.27. As set out above in relation to Adopted ALDP Policy T3, the provision of EV charging is an aspect which was not afforded weight in the Officer’s Report of Handling for the application subject of this Appeal. It is discussed in detail in Section 5 in relation to reason for refusal 1 and 3. The Proposal is therefore considered to be in keeping with emerging Policy T3.

## Policy T3 – Parking

4.28. In relation to new car parks, Policy T3 states:

*Proposals for car parking that are not directly related to new developments will not be supported.*

4.29. The Report of Handling indicates that there is no demand for the Proposal, hence it is contrary to emerging Policy T3. The requirement for the parking and EV provision offered by the Proposal is however discussed in detail in Section 3, in relation to reasons for refusal 1 and 3, and in the accompanying Transport Statement of Case. The discussion highlights the need to ensure sufficient provision for parking and EV charging in the absence of alternative sustainable transport modes, thus the Proposal is not contrary to Policy T3.

## Material Considerations

### Supplementary Guidance (SG) Transport and Accessibility

4.30. This SG supports Adopted ALDP Policies T2 and T3. It states at paragraph 3.2 that:

*“The Scottish Government has committed to the almost complete decarbonisation of road transport by 2050. One way of achieving this is through encouraging and facilitating the uptake of electric vehicles (EVs)...”*

*... It is significantly cheaper and less disruptive to install EV infrastructure during construction than to retrofit later.*

- 4.31. Guidance on active and passive charging provision is also set out in the SG. In this regard, the Proposal includes 18 active EV charging points; and 42 passive EV spaces where cabling is to be provided for future charging points. This is in excess of existing policy requirements.
- 4.32. As set out in the accompanying Transport Statement of Case, there is currently an under provision of EV charging points serving the Airport: there are only 6 existing EV charging points at the Airport, and the planning approval for ABX Business Park car park will provide an additional 12 EV charging points, therefore, there is in theory an existing capacity of up to 18 EV charging points.
- 4.33. The proposal will double this existing capacity, providing an additional 18 charging points on opening, and more than quadrupling provision in the long term by including 42 passive EV spaces where cabling is to be provided for future charging points. The proposed charging provision exceeds the requirements of the Supplementary Guidance on Transport and Accessibility, as the Appellant recognises the comments made in relation to sustainability, and acknowledges the general view that travel to the Airport (and elsewhere) by private car should not be encouraged. However, the Appellant also acknowledges that EV charging provision and car parking provision is required both for Aberdeen International Airport, and Kirkhill Industrial Estate, as set out in evidence submitted with the application (in particular the Transport Statement) and discussed in more detail in Section 5 of this Statement.
- 4.34. For this reason, the Appellant aims to develop a car parking model which leads the way for EV parking provision. As the UK moves towards ending the sale of new petrol and diesel cars and vans by 2030, with all new cars and vans being fully zero emission from 2035, the Appellant recognises that now is the time for a modal shift away from typical car parking provision. The Proposal has therefore been developed to provide mechanisms which incentivise EV drivers and provide charging opportunities well beyond any current existing or known planned provision.
- 4.35. considers it necessary to go above and beyond current standards in order to lead the way in EV parking provision, as discussed in more detail in Section 5.

#### **Aberdeen's Electric Vehicle Framework 2020 to 2030 (January 2021)**

- 4.36. This document establishes an EV framework for Aberdeen from 2020 to 2030 which will encourage and actively cater for a greater uptake of electric vehicles in the city and will support relevant national, regional and local strategies. It should be used to guide the strategy development and investment decisions of the Council and other organisations in the city. The document identifies a number of potential key locations for EV charging infrastructure, which includes Aberdeen International Airport. The Proposal is therefore in keeping with the strategy outlined in this Framework.

#### **National Planning Framework 3 (NPF3) (23 June 2014)**

- 4.37. As set out in the Planning Statement submitted with the application, NPF3 acknowledges the need to support growth through airports such as Aberdeen International Airport; recognises that the road network has an essential role to play in connecting cities by car, public transport, and active travel and therefore transport connections and services are vital within each of the city regions (para 5.20); and confirms that air connectivity is essential in that it provides

a physical gateway into Scotland, and plays a vital role in ensuring Scotland remains an outward-looking country which is well connected and open for business (paras 5.22 and 5.23).

- 4.38. The Adopted ALDP also acknowledges this, stating that *“NPF3 identifies a number of developments considered essential to the delivery of the spatial strategy. In Aberdeen it highlights improvements to Aberdeen Airport as national developments”,* and recognising that *“ensuring good domestic and international air and sea links which are vital to the region’s economy”.*
- 4.39. The proposal is considered to contribute towards all of these aims, as set out in relation to reason for refusal 3 in Section 5 below.

#### **National Planning Framework 4 (NPF4) (8 November 2022)**

- 4.40. The Revised Draft National Planning Framework (NPF4) sets the direction for Scotland’s spatial strategy and growth aims, alongside a comprehensive set of national planning policies to form part of the statutory development plan. Key strategies and policies of note in NPF4 to be considered in the determination of this Appeal are therefore set out below:

- 4.41. Part 1 – A National Spatial Strategy for Scotland 2045 states:

*“Scotland’s national and international connectivity for people and freight will remain important, for the economic, social and cultural benefits it delivers and for supporting wider Government ambitions on trade, tourism, and business development. **Airports, ports and rail links will provide vital connections within Scotland and beyond which will be crucial to building on a sustainable recovery whilst helping to decarbonise transport through low and zero emissions technologies...**”* (Pegasus emphasis).

- 4.42. The proposal is considered to contribute towards all of these aims, as set out in relation to reason for refusal 3 in Section 5 below.

- 4.43. Moreover, Policy 13 of NPF4 sets out that:

*“**Proposals to improve, enhance or provide active travel infrastructure, public transport infrastructure or multi-modal hubs will be supported. This includes proposals (i) for electric vehicle charging infrastructure**”* (Pegasus emphasis).

- 4.44. As the proposals will enhance electric vehicle charging infrastructure available within Kirkhill Industrial Estate and will serve Airport users, as set out in detail in Section 5 of this Statement, the proposals are in keeping with, and indeed supported by, Policy 13 of Revised Draft NPF4.

## 5. Grounds of Appeal

5.1. It is submitted that the Proposal should be allowed for the following Reasons, which are expanded on in more detail in the remainder of this Statement:

1. The proposals assist in achieving a modal shift from fossil-fuelled cars to electric vehicles, providing a notable proportion of charging facilities which are otherwise not proposed or planned for at Kirkhill Industrial Estate, to support Scotland's aim for all vehicles to be fossil-free by 2030. Policies T3 of the Adopted Aberdeen Local Development Plan (ALDP) and T2 of the Proposed ALDP support initiatives for alternative fuelled vehicles where appropriate, for example in circumstances where people need to travel by private car, which is demonstrated to be the case in this Statement. Policy 13 of the Revised Draft NPF4 goes on to actively support proposals which enhance multi-modal hubs, including proposals for EV charging infrastructure, highlighting the importance of EVs in achieving a modal shift towards sustainable transport modes.
4. The proposal is consistent with *Policy B1 Business and Industrial Land* in terms of land use zoning and, in relation to the evidence supporting Reasons 1 and 3 above and below, assists in enhancing the sustainability of car travel associated with the surrounding business and industrial land. It is therefore in keeping with Policy B1 and supporting sustainable transport policies, including Policy T3 of the Adopted ALDP and Policy T2 of the Proposed ALDP.
2. A proportion of passengers will always access the Airport by car; whilst there is some uncertainty regarding passenger numbers given the impact of the recent Covid-19 pandemic on airport travel, it remains the case that adopted and emerging policy supports and encourages the future growth of the Airport, and adequate parking and EV charging facilities need to be provided to accommodate the associated increase in passenger numbers.

### Reason 1

5.2. **The proposals assist in achieving a modal shift from fossil-fuelled cars to electric vehicles, providing a notable proportion of charging facilities which are otherwise not proposed or planned for, to support Scotland's aim for all vehicles to be fossil-free by 2030.**

5.3. The Council's first reason for refusal relates to Kirkhill Industrial Estate, contending that the provision of car parking to serve the Industrial Estate would encourage people to drive and thus not contribute to a modal shift towards sustainable transport modes. In this regard, the supporting text to the emerging policy T3 in the Proposed ALDP states that:

*"11.21 At a local level the Aberdeen Local Transport Strategy (LTS) sets out the Council's vision for transport in Aberdeen which is to develop 'A sustainable transport system that is fit for the 21st 95 century, accessible to all, supports a vibrant economy, facilitates healthy living and minimises the impact on our environment'. This will be achieved through: increasing modal share for public sustainable and active travel (walking, cycling and public transport use); improving journey time reliability for all modes; improving road safety; improving air quality and the environment; and improving accessibility for all".*

- 5.4. The Council's determination of the application refers only to public sustainable and active travel modes as referred in in the emerging ALDP. Whilst the need to facilitate modal shift to these means of travel is acknowledged by the Appellant, it is noted that:
1. the provision of EV charging points is an important step in this modal shift which should be encouraged; and
  2. there exists a demand for parking and EV charging in the location identified.
- 5.5. As discussed in relation to these two matters below, the provision of EV charging is therefore an important consideration in terms of shifting car users towards more sustainable modes of car travel.

### **EV Charging Provision for Kirkhill Industrial Estate**

- 5.6. The Council's determination of the application gives no weight to the provision of Electric Vehicle charging as an important element in the modal shift towards more sustainable modes of transport. Whilst the Council have contended that the proposals are contrary to planning and transport policy which seeks a modal shift to more sustainable means of transport, they have applied no weight to the importance of providing for electric vehicles as part of this shift and to policies that support and promote this. As a cleaner alternative to traditionally fossil-fuelled vehicles, electric vehicles are an important step in sustainable transportation, and sufficient charging infrastructure needs to be put in place to enable this step to take place. This is supported by Policy 13 of the Revised Draft of NPF4, which although does not have full weight, is nearing adoption and represents the direction of travel for future fuels and transport.
- 5.7. The Council also set out in their Report of Handling that there are more sustainable ways of delivering increased EV charging infrastructure, specifically retrofitting spaces in existing car parks, rather than creating new spaces for the purpose. However, it should be noted that the Council's Supplementary Guidance on Transport and Accessibility identifies that retrofitting of EV charging infrastructure is expensive, and it is less disruptive for this to be installed during construction (as will be the case with the Appeal Proposal); in addition, there is no policy requirement in the Development Plan to retrofit chargers, and the proposed new Building Regulations only legislate for new development to include charging points. It is also the case, as set out in the submitted Transport Statement of Case, that EV provision will need to grow exponentially to meet demand in future, which the Appellant is seeking to contribute towards through the Proposal. The Transport Statement of Case also notes that there are double yellow lines in place which would prevent the Council from installing on-street charging options; indicating that private sector investment is required to deliver charging in this location.
- 5.8. On a strategic level, the importance of private sector investment in EV charging provision is clearly recognised. The *'Draft Vision for Scotland's Public Electric Vehicle Charging Network'* (Revised March 2022) recognises that a new generation of infrastructure and service delivery models will need to be considered as older technologies become obsolete and as expectations of access to a high quality, affordable and reliable service continues to grow. It states that:
- "At this stage of the market's development, public and **private sector** partnerships will be a key enabler in attracting and making the commercial case for investment viable."* (Page 11, Pegasus emphasis).

- 5.9. The vision also sets out that one of the Outcomes will be that *“Scotland has attracted **private sector investment** to grow the electric vehicle charging network, ensuring it meets the needs of all people.”*
- 5.10. This stance was also recognised in an Appeal decision for a large-scale EV charging facility<sup>1</sup>, which dealt with the matter of whether EV charging proposals represent sustainable development. The Inspector in that instance found that:
- “there can be little doubt that the Government expects that EVs will be at the forefront of its planned transition to zero emission transport over the next two or more decades”* (paragraph 12”);
- “In addition to ensuring that EVs are available and affordable, the transition to zero emission transport also requires a charging infrastructure network that is easy to use and is affordable, efficient and reliable. The Government envisages that the majority of vehicle charging will take place at home but recognises that a widespread public charging point network is important for drivers who do high mileage, travel long distances or who do not have access to charging points at home or at work”* (paragraph 13); and
- “The Ten Point Plan for a Green Industrial Revolution, published by the Prime Minister on 18 November 2020, increases the sense of urgency for the development of an efficient and reliable EV charging network by bringing forward the ban on the sales of petrol, diesel and most hybrid cars to 2030. The press release [ID1] speaks of accelerating the transition to EVs and of transforming our national infrastructure to better support their use. In light of the current, very low level of EV ownership in the UK compared to many other European countries,<sup>2</sup> transforming the existing charging network will be critical to achieving the Government’s objective of an accelerated transition to EV use. The Government’s ambition is that the UK should have one of the best and most comprehensive charging networks in the world”* (Paragraph 15).
- 5.11. Against that background, the Inspector’s determination of whether the proposal represented sustainable development came down to whether there was a need for charging in the location, which was proven, and the acceptance that only a small number of charging points were likely to be installed (retrofitted) into existing car parks. The Inspector found that that *“even if only half that number of charging points was to be provided [which in that case would be 51], the proposal would still support the strategy set out in the Road to Zero Paper and the Government’s 10 Point Plan and **would make a significant contribution to the transformation of the charging network**”* (paragraph 33, Pegasus explanation and emphasis added).
- 5.12. The Inspector concluded therefore that: *“...the proposal would make a positive contribution in respect of the economic, social and environmental dimensions of sustainable development as identified in paragraph 8 of the Framework and would constitute sustainable development”* (paragraph 38).
- 5.13. On this basis it is considered that significant weight should be afforded to the provision of EV charging at the Appeal Site, where a total of 60 chargers are proposed in an area with little

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<sup>1</sup> APP/F1610/W/20/3248674 “redevelopment of existing scrap yard and haulage depot to create electric car charging service station and associated works at Scrap Haulage Yard, Fosseyway, Lower Slaughter GL54 2EY”

existing provision and no large-scale planned provision for the future. It is also submitted that the Proposal should not be refused on a pre-emptive basis when there are no other submitted or proposed plans for EV charging to serve the Industrial Estate at the scale proposed by the Appellant.

- 5.14. It is, therefore, respectfully requested that the Local Review Board overturn the Council's first reason for refusal.

#### **Car Parking Provision for Kirkhill Industrial Estate**

- 5.15. Furthermore, demand analysis has been undertaken which demonstrates an existing need for car parking to serve Kirkhill Industrial Estate and Aberdeen International Airport, particularly car parking served by EV charging, as set out in the Transport Statement of Case submitted with this Appeal.
- 5.16. In regard to Kirkhill Industrial Estate and the Council's first reason for refusal, the Transport Statement of Case presents transport surveys and results indicating a need for parking in the location of the Proposal. Overspill parking on the verge and opposite accesses to businesses (i.e. not in allocated or dedicated parking spaces) was noted at the time of the surveys, undertaken in November 2022 (paragraphs 2.1.9 to 2.1.11). The surveys could not be undertaken to support the Proposal at the time of the planning application due to the ongoing effect of the Covid-19 pandemic, which was affecting the number of people travelling to work in offices and businesses on the estate. It is considered that working patterns are almost, if not entirely, back to a 'new normal' and the demand surveys have demonstrated that on this basis there is an apparent need for parking in the identified location.
- 5.17. The Transport Statement of Case also notes that there is 1 bus service, the X27, running per hour to Kirkhill via the Airport (paragraph 2.1.6). The 777 also runs once a day through the Estate; and the 17K runs 6 times a day along a similar route (north-south via the Airport)<sup>2</sup>. The linear bus routes cannot provide for all users of Kirkhill Industrial Estate, who are likely to travel from a wide area; the requirement for use of private cars is evidenced in the overspill parking encountered during the demand surveys. It is submitted that appropriately located parking will assist in minimising overspill, parking on verges and parking opposite junctions as has currently been demonstrated to be the case.
- 5.18. In serving the identified parking need, whilst offering options for EV charging and incentivising EV drivers, the Proposal is in keeping with Local Plan Policy T2. It maximises opportunities for sustainable travel; there will always be a need for travel by private car, particularly in the absence of current alternative modes of provision, and for a variety of drivers such as those who are less able-bodied and require the use of disability spaces (for which the Proposal caters for in the form of 12 no. dedicated disabled spaces), however any mechanisms and investment which encourage drivers to shift to EV use rather than traditionally fuelled vehicles assist in achieving an important step in the overall shift towards more sustainable forms of transportation.
- 5.19. For this reason, it is respectfully requested that the Local Review Board overturn the Council's first reason for refusal.

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<sup>2</sup> Bus routes and timetables taken from the Moovit App, accessed 19/12/2022.



## Reason 2

- 5.20. **The proposal is consistent with *Policy B1 Business and Industrial Land* in terms of land use zoning and, in relation to the evidence supporting Reasons 1 and 3 above and below, assists in enhancing the sustainability of car travel associated with the surrounding business and industrial land.**
- 5.21. It has been established both through pre-application advice received in relation to the Appeal Site and Proposal (reference 210942/PREAPP), and in the Report of Handling for the application, that whilst car parks are not explicitly referred to within Policy B1, it is considered that a car park could be consistent with the general purpose of this policy, as a car park is not a sensitive use which could be affected by surrounding industrial uses and would be in keeping with other car parks within the surrounding area.
- 5.22. It is also the case that the recent planning application (reference 191456/DPP) for a car park at International Gate, Dyce, for 462 parking spaces, which was approved via the Local Review Body on appeal on 14 October 2020 is located in a B1 Zone and was found to be an acceptable use.
- 5.23. As set out in the Planning Statement submitted with the application, the proposed use is for parking to serve both Aberdeen International Airport and Kirkhill Industrial Estate, which relies on a site being in a convenient location in relation to both the Airport and the Industrial Estate. Further evidence is provided in relation to Reasons 1 and 3 on the need for this car park in this location with EV charging provision.
- 5.24. Parking for both purposes is considered to be entirely in keeping with Policy B1. Furthermore, as set out in relation to Reason 1 above and Reason 3 below, the proposed EV charging provision will help to support a shift to more sustainable modes of transport, away from traditionally fossil-fuelled vehicles.
- 5.25. However, the Council's second reason for refusal goes on to state that the Proposal, "*when considered in the round alongside transportation policies and the intended purpose related to Aberdeen International Airport, ... would not enhance the sustainability of the related business and industrial land*".
- 5.26. It is presumed that this reason for refusal relates to Transport Policies T3 in the Adopted ALDP and T2 in the Proposed ALDP, which support sustainable and active travel in the round. However, the first part of these policies relates to new development that generates demand, e.g.:
- "New developments must be accessible by a range of transport modes, with an emphasis on active and sustainable transport, and the internal layout of developments must prioritise walking, cycling and public transport penetration..."*
- 5.27. As set out in Section 4 above, the Proposal is not expected to generate increased traffic, but rather serve an existing and, as set out in the Transport Statement submitted with the application and accompanying Transport Statement of Case submitted with this Appeal, a future demand both for parking and for EV charging facilities.
- 5.28. Adopted Policy T3 and emerging Policy T2 go on to state that:

*“...Recognising that there will still be instances in which people will require to travel by car, initiatives such as like car sharing, **alternative fuel vehicles** and Car Clubs will also be supported where appropriate” (Pegasus emphasis).*

- 5.29. As set out in the evidence pertaining to Reasons 1 and 3 above and below, this is a circumstance where it is considered that people will be required to travel by car, for four main reasons. Firstly, due to the demand for car parking set out in the Transport Statement of Case and discussed in this Statement. Secondly, in the absence of existing or proposed sustainable transport modes which can realistically replace all car travel to Kirklees Industrial Estate or Aberdeen International Airport. Thirdly, in relation to drivers such as less able-bodied drivers, and large families with small children, who cannot rely on public transport modes to these destinations. Fourthly and finally, particularly in relation to the Airport, that a large passenger catchment cannot be served entirely by public transport means.
- 5.30. The Proposal represents an initiative for alternatively fuelled vehicles, in this case electric cars, in a location where people will be required to travel by car. As set out in the submitted Planning Statement and Operational Strategy that accompanied the application, a range of measures are proposed to incentivise, encourage and provide for EV drivers, including charging provision, spaces reserved for EVs, and staffed recharge facilities. In accordance with Adopted ALDP Policy T2 and Proposed ALDP Policy T2, the Proposal should therefore be supported.
- 5.31. The provision of EV charging is also considered critical in ensuring the sustainability of businesses at Kirkhill Industrial Estate, particularly in the absence of any sustainable public transport options (as referred to in relation to Reason 1 above), by providing charging for EVs which would otherwise be uncertain in terms of location or timescales for coming forward. As noted in relation to Reason 1 above, there are no other submitted or proposed plans for EV charging to serve the Industrial Estate at the scale proposed by the Appellant, and the Council’s Supplementary Guidance on Transport and Accessibility identifies that retrofitting of EV charging infrastructure is expensive, whilst it is less disruptive for this to be installed during construction (as will be the case with the Appeal Proposal). As stated above, there is no policy requirement in the Development Plan to retrofit chargers, and the proposed new Building Regulations only legislate for new development to include charging points. It is, therefore, difficult to understand how the Council envisages EV provision to otherwise come forward. It is thus considered pre-emptive to dismiss this Proposal when the alternative would be to rely on the willingness of existing businesses/ land owners to retrofit existing facilities to serve drivers accessing Kirkhill Industrial Estate by electric car.
- 5.32. In regard to Aberdeen International Airport, as set out in more detail in relation to Reason 3 below, the Proposal not only contributes towards the sustainability of journeys associated with air travel, but also contributes towards the ongoing sustainable growth of the Airport, which is an aspiration repeated in adopted and emerging national policy.
- 5.33. The Proposal is therefore considered to be in keeping with local and national policies, and it is therefore respectfully requested that the Local Review Board overturn the Council’s second reason for refusal.

### Reason 3

- 5.34. **A proportion of passengers will always access the Airport by car; whilst there is some uncertainty regarding passenger numbers given the impact of the recent Covid-19 pandemic on airport travel, it remains the case that adopted and emerging policy supports and encourages the future growth of the Airport, and adequate parking and EV charging facilities need to be provided to accommodate the associated increase in passenger numbers.**
- 5.35. In terms of the need for car parking to serve Airport passengers, the Appellant has relied on all known sources of information to undertake a demand forecast, as set out in the Transport Statement (v5, May 2022) submitted with the planning application and resubmitted with this Appeal.
- 5.36. The Council state in their Report of Handling that the assessments takes *“no account of planning and transport policy which seek modal shift to more sustainable means of transport”*. Whilst the need to facilitate modal shift is acknowledged, it is noted that:
1. The provision of EV charging points is an important step in this modal shift which should be encouraged, as discussed in relation to Reason 1 above;
  2. There remains a need to ensure an adequate supply of onsite parking and choice to serve the Airport;
  3. Not all passengers to the Airport will travel by public transport, given the current absence of sufficient public transport infrastructure and the absence of concrete plans to improve this in future, the needs of drivers such as less able-bodied drivers requiring the use of disability spaces, large families with small children who cannot reasonably be expected to rely on public transport, and the wide catchment for passengers which cannot all be accommodated by public transport. This means parking will continue to be required.
- 5.37. These three points are explored in further detail below.

#### **EV Charging Provision for the Airport**

- 5.38. Returning to Reason 1 above, car drivers accessing the Airport in future will be EV drivers, requiring charging facilities. Provision for EV drivers represents a step towards a more sustainable transport future, an important step which must be accommodated if Scotland’s overall goal to phase out the sale of fossil-fuelled vehicles by 2030 is to be realised.
- 5.39. Providing adequate EV charging at appropriately located and designed car parking facilities to serve the Airport is considered to be key in shifting towards the decarbonisation of air travel, to meet these policy aspirations. The Appellant acknowledges that travel to the Airport (and elsewhere) by private car should not be encouraged, however as a cleaner alternative to traditionally fossil-fuelled vehicles, electric vehicles are an important step in sustainable transportation and sufficient charging infrastructure needs to be put in place to enable this step to take place.
- 5.40. A step change is therefore required to existing car parking models to accommodate the increase in EV vehicles and incentivise drivers to switch to EVs, and the Appellant considers

that they are proposing the first car park of this kind to take that step to serve Aberdeen Airport: the Appellant therefore aims to develop a car parking model which leads the way for EV parking provision. As the UK moves towards ending the sale of new petrol and diesel cars and vans by 2030, with all new cars and vans being fully zero emission from 2035, the Appellant recognises that now is the time for a modal shift away from typical car parking provision. The Proposal has therefore been developed to provide mechanisms which incentivise EV drivers and provide charging opportunities well beyond any current existing or known planned provision, as the Appellant recognises that now is the time for a modal shift away from typical car parking provision. Further details relating to the operational mechanisms proposed to incentives EV drivers, and in relation to the proposed Electric Shuttle Bus service to the Airport, are set out in the separate Operational Strategy which was submitted with the application.

- 5.41. The Transport Statement of Case also notes that as of 2020 there were only 56 chargers in place serving the wider Aberdeen area; the original Transport Statement identified that only 16 of these can currently be considered to serve the Airport itself (6 installed at the Airport, and 12 planned at ABX business park). The Proposal would more than double existing provision by 18 active spaces initially, and quadruple existing provision in the long-term with the proposed 42 passive spaces.
- 5.42. As set out in relation to Reason 1, it is difficult to envisage how the Council foresee charging at the scale required for the Airport will come forward. It is therefore again submitted that the Proposal should not be refused on a pre-emptive basis that EV charging would better be retrofitted elsewhere, when there are no other submitted or proposed plans for EV charging at the scale proposed by the Appellant to serve the Airport, and retrofitting has identified challenges in terms of expense and disruption (as set out in the SG for Transport and Accessibility, referred to under Reason 1 above).
- 5.43. To re-iterate the statement made in relation to Reason 1 above, therefore, the proposed development is in keeping with Local Plan Policy T2 in that it maximises opportunities for sustainable travel; there will always be a need for travel to the Airport by private car, however any mechanisms and investment which encourage drivers to shift to EV use rather than traditionally fuelled vehicles assist in achieving an important step in the overall shift towards more sustainable forms of transportation. EV charging provision is also supported by NPF4 Policy 13, and the Proposal should therefore be supported.
- 5.44. It is therefore respectfully requested that the Local Review Board overturn the Council's third reason for refusal on this basis.

#### **Car Parking Provision for the Airport**

- 5.45. As set out in the submitted application documents, there will always be a proportion of passengers accessing the Airport by car. It is not reasonable to suggest all passengers to the Airport will access the Airport via non-car modes of sustainable transport, particularly in the absence of any short to medium term commitments for sustainable transport provision. This was acknowledged in the recent decision by the Local Review Body for the proposed car park at International Gate, Dyce (reference 191456/DPP), where it was noted that not all users can or will in future choose to access the Airport using existing public transport connections.
- 5.46. To better inform future demand requirements, parking surveys have been undertaken as presented in the accompanying Transport Statement of Case. The surveys could not be undertaken to support the Proposal at the time of the planning application due to the ongoing

effect of the Covid-19 pandemic, which was affecting the number of people travelling via Aberdeen International Airport. It is considered that operational capacity is almost, if not entirely, back to normal and a reasonable indication of parking capacity could be gathered from surveys.

- 5.47. The findings noted in the Transport Statement of Case state that the 2 car parks that were open at the time of the survey were already approaching capacity (refer to paragraph 2.2.8 in the Transport Statement of Case). The three other car parks that were surveyed remain closed (refer to paragraph 2.2.6 in the Transport Statement of Case); whilst the Council refer to them in their Report of Handling, and all known capacity was taken into account in the demand forecasts set out in the Transport Statement submitted with the planning application, the reality is that it remains uncertain as to when those car parks will reopen.
- 5.48. Nonetheless, when existing known or planned car parking provision is compared to passenger growth predictions, the Transport Statement of Case concludes that there will be a shortfall in car parking and EV provision for the Airport (refer to Table 2.1 in the Transport Statement of Case).
- 5.49. In fact, the shortfall is significant even if the Proposal is allowed; it is therefore considered to be the case that even if a greater proportion of passengers do in future shift to more sustainable transport modes (the options for which are discussed in the following section), given the anticipated overall growth in passengers aligning with growth ambitions for the Airport, and the fact that a proportion of car users will remain, it is likely that all of the proposed and potentially available parking discussed in the Transport Statement and surveyed in the Transport Statement of Case, including the parking and EV provision set out in this Proposal, will be required in future (refer to Table 2.1 in the Transport Statement of Case).
- 5.50. It was also acknowledged in relation to the appeal for International Gate, Dyce (reference 191456/DPP), that there has been a continued growth in public transport use for airport trips in recent years, despite the opening of new airport car parks during that period. This is consistent with the Appellant's views and, as set out above, if future growth is taken into consideration, it can be seen that both new car parks fit for the future fleet of alternatively fuelled vehicles and growth in public transport use will occur. It is therefore respectfully requested that the Local Review Board overturn the Council's third reason for refusal on this basis.
- 5.51. Further consideration of potential options for sustainable public transport modes serving the Airport and how this may affect parking provision is set out below.

#### **Sustainable Transport Provision for the Airport**

- 5.52. It is acknowledged that there should be a modal shift towards more sustainable forms of transport, however, as set out in Reason 1 above, firstly the role of EVs in this shift needs to be appreciated, as does the value of the Appeal Proposal in accommodating EVs and incentivising the use of EVs to facilitate this shift.
- 5.53. Secondly, it must be recognised that there is not currently the means for this modal shift to be achieved in regard to public transport options to the Airport. The Transport Statement of Case submitted with this Appeal states that there are only 2 existing bus routes serving the Airport; one express service and one dedicated service running up to 4 buses per hour (paragraph 2.1.6 of the Transport Statement of Case). These cannot reasonably serve the full

proportion of passengers wishing to travel to the Airport given its wide catchment (as discussed below).

- 5.54. The Report of Handling notes the Aberdeen Rapid Transit Project as a means of providing sustainable travel to the Airport, however this is not expected to begin operating on key corridors until 2030. This results in at least another 8 years of the current situation whereby there are limited sustainable transport options for Airport passengers; a timeframe during which all car users will need to transition from traditional fossil-fuelled vehicles to electric vehicles. The Proposal addresses this on two accounts: providing parking to meet anticipated demand, as best can be forecast at this time, and to meet anticipated EV charging needs both immediately (18 active spaces proposed) and in the long term (42 passive spaces proposed).
- 5.55. Moving forward, the Aberdeen Rapid Transit (ART) Project alongside existing bus provision cannot reasonably serve the full proportion of passengers wishing to travel to the Airport. Like many sustainable transport modes, the ART Project is proposed to operate on key routes, whilst the buses run on relatively linear routes to and from the Airport with the majority of connections towards Aberdeen. On a practical level such services cannot provide for all passengers arriving from various routes and directions. The Airport serves a wide catchment for passengers, noting in its own Masterplan (2013) that the catchment was dominated by the City (63%) but 25% from wider Aberdeenshire; with areas including Moray, Angus, Highland and Perth & Kinross providing other significant traffic (between 1 and 3%); these identified locations are all widely spread out geographically and require several routes to be catered for, whilst it will be difficult to accommodate traffic from the more rural Aberdeenshire on public transport given the sparse nature of population and various locations from which passengers may start their journey.
- 5.56. In addition to this, it is not reasonable to expect very many passengers to arrive by other sustainable transport modes e.g. walking and cycling, as airport passengers will almost always have luggage for their journey. It is also the case, as mentioned above, that certain groups will continue to rely on the private car, including less able-bodied drivers and families with small children who cannot be reasonably expected to use public transport to access the Airport.
- 5.57. Thus, in the absence of sustainable public transport facilities serving the Airport there is a 'gap' which will be filled by car users, increasingly EV car users, which are not considered to be adequately catered for when the Appellant's demand forecasts are taken into consideration. As above, these take account of growth projections which accord with growth aspirations for the Airport set out in national policy. The benefits of the Proposal in filling this gap should therefore be taken into consideration in the determination of this Appeal.

### **Summary: Reason 3**

- 5.58. In summary, therefore, a proportion of passengers will always access the Airport by car; whilst there is some uncertainty regarding passenger numbers given the impact of the recent Covid-19 pandemic on airport travel, it remains the case that adopted and emerging policy acknowledges the importance of Scotland's international connectivity and the need to support connections from airports such as Aberdeen International Airport. NPF3 supports growth associated with the Airport, and the Adopted ALDP acknowledges this, stating that *"NPF3 identifies a number of developments considered essential to the delivery of the spatial strategy. In Aberdeen it highlights improvements to Aberdeen Airport as national*

developments”, and recognising that “ensuring good domestic and international air and sea links which are vital to the region’s economy”.

5.59. Moreover, paragraph 12.8 of the Proposed ALDP (2020) states:

*“Aberdeen International Airport is a strategic transport hub which is vital to the success of the North East economy. It directly supports thousands of jobs and helps to ensure that Aberdeen remains a competitive, attractive and well-connected location for business”.*

5.60. Finally, it should be noted that ‘Aberdeen’s Electric Vehicle Framework 2020 to 2030’ (January 2021) establishes an EV framework for Aberdeen from 2020 to 2030 which should be used to guide the strategy development and investment decisions of the Council and other organisations in the city. The document identifies a number of potential key locations for EV charging infrastructure, which includes Aberdeen Airport, thus the Proposal accords with the Framework and accordingly should be supported.

5.61. The provision of readily accessible car parking and, particularly EV-ready car parking, is therefore considered to be fundamental in securing the economic benefits of a readily accessible airport for the region, which was also a point acknowledged by the Local Review Body in their consideration of the proposed car park for International Gate, Dyce (reference 191456/DPP), and the Proposal is thus entirely in keeping with adopted and emerging policies and frameworks.

5.62. It is therefore submitted that this should be given weight in the determination of the Appeal and it is respectfully requested that the Local Review Board overturn the Council’s third reason for refusal on this basis.

## **Other matters for consideration**

### **Drop-off trips**

5.63. As discussed in the submitted Planning Statement, adequate parking reduces the potential for ‘drop and drive’ trips where airport passengers are dropped off at, and collected from, an airport at either end of their journey by taxis or family and friends: this results in greater overall trips to the airport. Provision of adequate car parking and EV charging as set out in the Proposal could help to reduce these types of trips by encouraging drivers to park and take the proposed electric shuttle bus to the airport, making use of the recharge offer to charge their vehicle whilst they are away, ensuring it is ready to drive on the return trip.

5.64. Paragraphs 5.16 to 5.19 of the Planning Statement submitted with the application discuss this matter, specifically in the context of an application relating to car parking at Manchester Airport, which was approved by Cheshire East Council<sup>3</sup>, in more detail and are set out below for ease of reference:

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<sup>3</sup> Cheshire East decision dated September 2019, reference 19/0399M, for ‘Development of a car park associated with the operation of Manchester Airport, demolition of 48 and 52 Moss Lane with associated outbuildings, provision of a new landscaping belt, footpath and ecological mitigation’ at Hollytree Cottage, 52 Moss Lane, Styal, SK9 4LG.

5.16. One way of reducing the environmental impact of air travel is to minimise the associated impact of trips to and from Airports. As noted in the Local Transport Strategy, "parking is a key element of managing demand and influencing modal choice". Reducing car parking can be seen to force users to shift to more sustainable transport modes, thus achieving the aims of sustainable transport policies. Equally, however, reducing car parking without an existing network of sustainable transport modes can result in more people getting dropped off at Airports either by relatives in private cars or by taxi, thus necessitating four journeys to and from an Airport rather than two if those people were to drive and leave their cars at the Airport.

5.17. This was recognised in a recent decision (September 2019) by Cheshire East Council, in that case in the context of limited public transport facilities and the pressure on existing car parks. For this site in Aberdeen, the pre-application response notes that "In recent years, access to the Airport by public transport has been significantly improved through the introduction of the Jet 727 and other bus services, providing a frequent link into the city centre and other areas". However, as demonstrated in the submitted Transport Statement, as recently as 2019 just 12% of passengers arrived at the Airport by bus/ coach. The Transport Statement also confirms that if passengers move towards more sustainable forms of transport, e.g. by bus, there would need to be a shift of 4,186 passengers to sustainable travel modes per week.

5.18. In summary the recent low take-up of bus/ coach access to the Airport, coupled with the future demand for bus/ coach if insufficient car parking is provided, alongside the identified shortfall in car parking provision to align with Aberdeen International Airport's growth plans (as set out in the submitted Transport Statement) could potentially lead to significant pressure on existing parking provision and thus increase demands for drop-off trips.

5.19. The proposed car park can therefore be seen to contribute towards sufficient parking to meet future demand and thus would reduce the need for drop-offs and taxi journeys, i.e. reducing the number of car journeys to and from the Airport. This would reduce the overall demand for car trips associated with the Airport, which contributes to the more sustainable operation of the Airport in accordance with policies on sustainable transport. It also supports the effective and efficient operation of the Airport, in accordance with Local Plan Policy B4.

### **EV Shuttle**

- 5.65. A further element of the Proposal to be discussed is the provision of an electric shuttle bus to move passengers from the car park to the Airport. It can reasonably be foreseen that the future, which the Appellant aspires to, could comprise passengers taking a fully electrified journey to the Airport: arriving in their electric vehicles at the car park, leaving this with staff to accommodate any recharging needs, and taking the electric shuttle to the Airport building. The Appellant recognises the need to provide for and support an electrified future and seeks to do this through the provision of EV charging points and electric shuttle bus within the proposal.

### **Number of EV charging points**

- 5.66. In terms of the number of EV charging points, it should be acknowledged that there is a need to cater for supply and demand, noting that the proportion of EVs will change over time. The Appellant therefore proposes to install 18 active electric charging points on opening; this is





anticipated to meet existing and short-term future demand for charging for both Airport passengers and users of Kirkhill Industrial Estate. The Appellant proposes to include infrastructure (cabling) for 42 charging points; this is anticipated to meet longer term demand for charging. The Appellant is content to agree that this provision is reviewed over the course of the coming years to ensure that infrastructure upgrades and extended charging provision is put in place to meet demand, a matter which can reasonably be controlled by planning condition.

## 6. Conclusion

- 6.1. This Statement of Reasons has set out why the Proposal should be permitted, and why the Council's three reasons for refusal should be overturned.
- 6.2. It has been demonstrated that the Proposal assists in achieving a modal shift from fossil-fuelled cars to electric vehicles, providing a notable proportion of charging facilities which are otherwise not proposed or planned for, to support Scotland's aim for all vehicles to be fossil-free by 2030.
- 6.3. The Council's determination of the application refers only to public and active travel in relation to sustainable transport modes, as referred in the emerging ALDP, in the form of the supporting text to Policy T3 (paragraph 11.21 of the Proposed ALDP). Whilst the need to facilitate modal shift to these means of travel is acknowledged, it is noted that the provision of EV charging points is an important step in this modal shift which should be encouraged.
- 6.4. Weight should be afforded to the importance of providing for electric vehicles as part of this shift to sustainable modes of transport. As a cleaner alternative to traditionally fossil-fuelled vehicles, electric vehicles are an important step in sustainable transportation, and sufficient charging infrastructure needs to be put in place to enable this step to take place. This is recognised in National Policy (including emerging NPF4 Policy 13), and was the subject of scrutiny in an Appeal decision for a large-scale EV charging facility. In that Appeal, the Inspector found that provision of EV charging, if 51 charging points were delivered, made a significant contribution towards sustainable development in a location where need for it was demonstrated. In this instance, 60 spaces are proposed in total and a need has been demonstrated as discussed in Section 5.
- 6.5. In regard to the Council's first reason for refusal, the Proposal meets a proven demand for EV Charging Provision for Kirkhill Industrial Estate, and also a proven demand for car parking spaces in this location for Kirkhill Industrial Estate. It is therefore entirely in keeping with Adopted ALDP Policy T3 and Proposed ALDP Policy T2.
- 6.6. As far as the Council's second reason for refusal is concerned, it has been demonstrated that the Proposal is consistent with adopted policy in terms of land use zoning, and assists in enhancing the sustainability of car travel associated with the surrounding business and industrial land. It is therefore entirely in keeping with Adopted ALDP Policy B1 and Proposed ALDP Policy B1 and supporting sustainable transport policies.
- 6.7. Finally, in regard to the Council's third reason for refusal, it has been demonstrated that a proportion of passengers will always access the Airport by car, and it remains the case that adopted and emerging policy supports and encourages the future growth of the Airport. Adequate parking and EV charging facilities need to be provided to support this. The Proposal meets a proven demand for EV Charging Provision for the Airport, and also a proven demand for car parking spaces for the Airport, without precluding the development or take-up of other sustainable transport modes. The Proposal is therefore entirely in keeping with Adopted ALDP Policy T3 and Proposed ALDP Policy T2.
- 6.8. Other benefits of the Proposal highlighted in this Statement include the provision of car parking to offset/ reduce the potential for drop-off trips; in the context of Aberdeen International Airport, adequate car parking with EV charging could contribute to reducing the need for drop offs, which have a greater impact on the environment. The provision of EV



parking and recharge facilities, alongside an entirely electric quick and convenient shuttle service to the Airport, form part of a package of measures to encourage more sustainable transport to the Airport via electric vehicle.

- 6.9. In summary, therefore, it is suggested that a sustainable approach for this location is to provide car parking and EV charging to meet demand for passengers travelling to the Airport and Kirkhill Industrial Estate, which the Proposal subject of this Appeal sets out to do. For all of the reasons set out in this Statement, it is therefore respectfully requested that the Local Review Board overturn the Council's three reasons for refusal and that the Appeal be allowed.



## Appendices

Originally submitted planning documents appended, including:

- 16-2043 Aberdeen Airport Drainage Assessment V2a-compressed
- 16-2043 Aberdeen Airport Transport Statement V5
- 16-2043 Access and Site Layout Rev B
- 16-2043 Rev A Red Line Boundary Plan
- 211759\_DPP-Application\_Form - amended 07062022
- L000v1 PL Cover letter 07.06.22
- P21-2232.001B Landscape Masterplan 310522
- PEA Report Dyce Avenue V1.2
- RO01v4 - PL - Planning Statement 23.05.22
- RO02v2 - PL - Operational Strategy 23.05.22

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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