



## Strategic Place Planning

Report of Handling

<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.