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**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



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**Head of Planning and Development**