

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 5th 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

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