

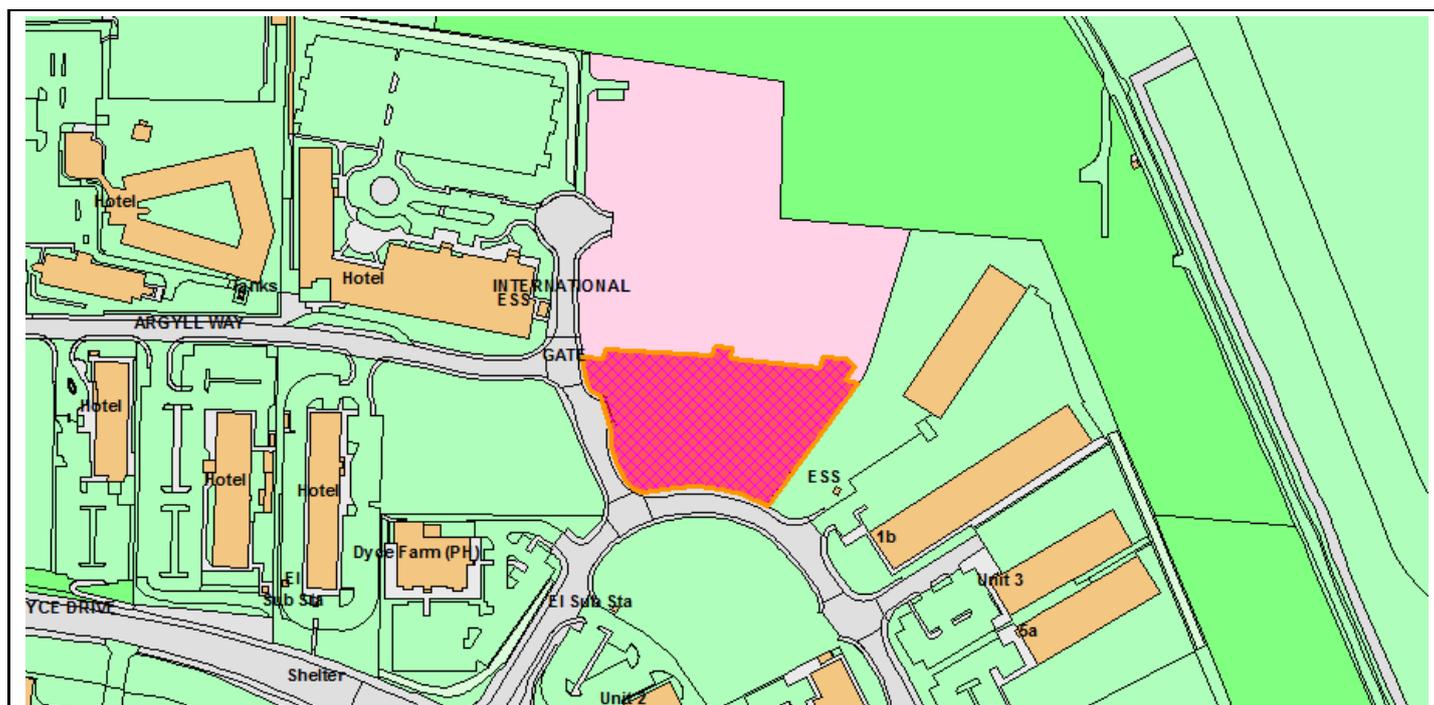


## Planning Development Management Committee

Report by Development Management Manager

**Committee Date:** 9 March 2023

Site Address:	Land at International Gate, Dyce, Aberdeen, AB21 0BH
Application Description:	Extension of an existing car park with associated external lights and landscaping works
Application Ref:	221436/DPP
Application Type	Detailed Planning Permission
Application Date:	1 December 2022
Applicant:	ABZ Development Ltd
Ward:	Dyce/Bucksburn/Danestone
Community Council:	Dyce And Stoneywood
Case Officer:	Matthew Easton



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### **RECOMMENDATION**

Approve Conditionally

## **APPLICATION BACKGROUND**

### **Site Description**

The application relates to an undeveloped plot within ABZ Business Park, Dyce. It extends to 0.62 hectares and comprises rough ground with scrub vegetation. It is located towards the northern end of the business park, to the east of the Crowne Plaza and Holiday Inn Express hotels, with the road known as International Gate separating the site and the hotels.

To the immediate north is the Airparks Express airport car park featuring 462 parking spaces. It is a surface car park, which is accessed from International Gate. There is a pedestrian route between the car park and main airport terminal, which is around a 500m walk door-to-door, largely being via covered walkways.

To the south across International Avenue is a vacant plot and industrial and office buildings, and to the east are industrial units.

### **Relevant Planning History**

An application for detailed planning permission (191456/DPP – referred to as the ‘original application’ in this report) to construct the 462-space car park (now Airpark Express) was refused by officers using delegated powers in May 2020. The reasons for refusal were –

*“The initial proposal was for a car park that would be available for use by a range of users, unrelated to any new development. Such a proposal would be a clear conflict with the Transport and Accessibility Supplementary Guidance and therefore in that regard the proposal would not be acceptable in principle.”*

*The proposal has also been considered on the basis that it could potentially be for airport users only however it is considered that 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 that there are capacity issues with the existing level of parking available to those using the airport and additional supply is likely to 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.”*

In October 2020, the decision was subject to a review by the Local Review Body (LRB) where it was overturned unanimously, and planning permission granted. The reasons for the LRB’s decision were –

*“Members 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. Members were 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.*

*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 Local Review Body 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.*

*Support was expressed for the incorporation of additional Electric Vehicle charging points as part of the proposal. Members also noted the importance of ensuring appropriate landscaping, details of which may be secured by condition, to provide screening and mitigate the visual impact of the proposal, consistent with policy D1 (Quality Placemaking by Design) of the Aberdeen Local Development Plan.”*

The planning permission was implemented with the car park subsequently constructed and opened in July 2022.

## **APPLICATION DESCRIPTION**

### **Description of Proposal**

Detailed planning permission is sought for an extension to the existing car park. It would comprise 162 standard parking spaces which would be integrated with and function as part of the existing car park. The car park surface would be gravel, with a new secondary vehicular access being created onto International Gate, to the south of the existing access. On its outside boundaries, the extended area would be enclosed by a 2m high weld-mesh fence to match the existing car park.

The resultant overall, extended car park would have a total of 648 spaces, which would be divided into 613 standard spaces, 23 disabled spaces and 12 electric vehicle (EV) charging spaces.

### **Amendments**

None.

### **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=RM61PUBZLWP00>

- Drainage Assessment
- Planning Statement and addendums
- Transport Technical Note

### **Reason for Referral to Committee**

The application has been referred to the Planning Development Management Committee because the Roads Development Management Team has objected to the application.

## **CONSULTATIONS**

**Aberdeen International Airport (Safeguarding Manager)** – The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding

criteria unless any planning permission granted is subject to a condition requiring a bird hazard management plan to be agreed and implemented.

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

- The proposal is contrary to Council policies which aim to reduce private vehicular trips and it undermines the viability of alternative sustainable transportation. There are current targets to increase the proportion of passengers accessing the airport by public transport, as such this proposal is contrary to such aspirations.
- Whilst there are some public transport challenges in reaching the airport from different parts of Aberdeenshire, options to reach Aberdeen city centre and then onward travel to the airport do exist. This proposal invites a constant turnover of private vehicles and would increase the attractiveness of using such a mode choice to reach the airport. This does nothing to help promote public transport trips, walking or cycling, and could be to the detriment of existing and future public transport initiatives/aspirations.
- Whilst the car park is within walking distance to the airport terminal and does not rely on a shuttle transfer, which is a benefit to this site, the majority of the journey to the airport is still made by private motor vehicle.
- The applicant has noted this proposal would reduce vehicle miles associated with the airport by reducing drop-off/pick-up trips. However, no figures have been provided to support the idea that the current car park is attracting passengers who would previously have been dropped off. Without a means of discouraging drop off / pick up at the airport (something outwith control of the applicant) it is unclear that providing extra parking alone would reduce drop-off/pick-up trips.
- Policy T2 of the Aberdeen Local Development Plan (ALDP) notes “*new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel.*” This proposal is only for private vehicles. Roads officers remain unconvinced that the provision of extra parking in isolation to other measures is a sustainable and realistic means of reducing vehicle trips associated with pick up/drop off at the airport. Additional parking will likely lead to increased vehicle trips.
- Policy T3 of the ALDP notes “*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.*” The location of the car park allows the final section of a trip (noted by the applicant as 500m) can be completed by walking. The majority of the trip is however conducted by private motor vehicle.
- Similar themes as above are also in the Policy T3 of the Proposed ALDP which includes “*Proposals for car parking that are not directly related to new developments will not be supported.*” This proposal is for an extension to an existing car park and is not related to any new development.
- Confirmation has been received that another existing long-stay car park (circa 500 spaces), previously being utilised as a COVID-19 test-site, is to re-open as airport parking. With the occupancy rates provided by the applicant being from a period when this other car park was not operational, it is unclear whether there is justifiable demand for the car park extension.

- The traffic impact assessment carried out on behalf of the applicant has shown that the development site as class 4 (business) and class 5 (industrial) (which this site is zoned for) would be expected to produce more vehicle trips than the existing car park site as well as with the extension. Owing to the nature of flight times and the duration of time vehicles spend parked, the traffic impact from the car park and proposed extension would likely be spread out over a longer period than if the site was developed for classes 4 and 5. However, should an application come forward for such uses, measures could be introduced to limit vehicle trips, especially given the site's proximity to Craibstone Park and Ride, the cycle facilities in Dyce, Dyce Train station etc. This proposal, as a car park for private vehicles, has no scope to introduce measures to limit such mode of travel.

**Dyce And Stoneywood Community Council** – Agree with the applicant that a car park is not an inconsistent land use with respect to Policy B1 (Business and Industrial Land) of the Aberdeen Local Development Plan (2017).

There are tensions with respect to Policy T2 (Managing the Transport Impact of Development), but the Community Council accepts that car use is inevitable in some circumstances and the site is well located for passengers to walk to the main terminal of the airport without the need for a shuttle bus.

The landscaping proposals (Policy D1) are welcomed, and it is hoped that the lighting will be carbon neutral and designed to minimise light pollution.

## **REPRESENTATIONS**

One objection has been received from AGS Airports, the owner and operator of Aberdeen International Airport. In summary the following matters are raised –

1. 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 carbon emissions and achieve the Scottish Government's statutory net zero objectives. Through the airport masterplan, surface access and carbon management strategies, the airport works with partners to promote more sustainable surface transport choices in a co-ordinated manner.
2. 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, the airport would highlight the Scottish Government Climate Change Plan Update commitment to reduce car kilometres by 20% by 2030.
3. The application has asserted that there is a current under provision of car parking capacity which will be exacerbated by future growth outlined in the airport's 2013 Masterplan, and which this application addresses by providing additional car parking capacity. A 'predict and provide' approach is completely inconsistent with extant policy requirements.
4. The temporary use of the airport's 530 space 'Park and Depart' car park as a COVID-19 Government Testing Centre has ceased and the facility will re-open in 2023.
5. The extension does not fall within the descriptions of business or employment uses allowed by Policy B1 of the Aberdeen Local Development Plan (ALDP) and it does not protect or improve

access to the airport. Beneficial employment or economic impacts have not been identified and a large part of ABZ Business Park site has been developed, leaving the application site as one of the few plots remaining available for employment uses. The proposed use will not enhance the attraction of the area and conflicts with sustainability objectives. The proposed development is therefore contrary to Policy B1 and related Strategic Development Plan provisions.

6. The proposed extension would not accord with the Airport Masterplan and Policy B4 of the ALDP. The masterplan indicates that the airport envisages the majority of future infrastructure growth will be on land already in use by the airport and 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, through the erection of a car park deck and the 511-space surface car park.
7. The proposed extension would compromise the ability to minimise traffic generated by the airport and makes no contribution to encouraging more sustainable travel choices. No evidence has been provided as to how opportunities for sustainable and active travel have been maximized. It therefore does not accord with policies T2 or T3 of the ALDP.
8. The airport has reviewed the Proposed ALDP (2020) and consider it to be consistent with the relevant policies of the adopted LDP. It is therefore suggested that the proposed development will therefore remain contrary to the Development Plan once the Proposed ALDP is adopted.
9. The proposal is not consistent with Policies 1 (Tackling the Climate and Nature Crises) and 13 (Sustainable Transport) of the revised NPF4.
10. The existing car park has been operating without the Car Park Management Plan required by condition. Furthermore, they have also been operating a vehicle to transport passengers from the car park to airport facilities, despite numerous references in supporting information to the site being accessible by foot and being a more sustainable option than an arrangement that involves a bus transfer. It is not clear if the rudimentary and unsustainable shuttle service is in response to demands from customers during inclement weather or from those with reduced mobility. In any case, the proposed extension is even further away from airport facilities and is likely to exacerbate issues.

## **MATERIAL CONSIDERATIONS**

### **Legislative Requirements**

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that where making any determination under the planning acts, regard is to be had to the provisions of the Development Plan; and, that any determination shall be made in accordance with the plan, so far as material to the application, unless material considerations indicate otherwise.

### **Development Plan**

#### **National Planning Framework 4**

National Planning Framework 4 (NPF4) is the long-term spatial strategy for Scotland and contains a comprehensive set of national planning policies that form part of the statutory development plan. The relevant provisions of NPF4 that require consideration in terms of this application are –

- Policy 1 (Tackling the Climate and Nature Crises)
- Policy 2 (Climate Mitigation and Adaptation)
- Policy 3 (Biodiversity)
- Policy 13 (Sustainable Transport)
- Policy 22 (Flood Risk and Water Management)

### 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 five years after the date on which the current plan was approved.

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)
- Policy T3 (Sustainable and Active Travel)

### **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. All the recommendations within the Report have been accepted and the modifications made to the PALDP were agreed by Full Council on 14 December 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 the relevance of these matters to the application under consideration.

The following policies are relevant –

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

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

- Flooding, Drainage and Water Quality Supplementary Guidance
- Landscape Supplementary Guidance
- Transport and Accessibility Supplementary Guidance

### **Other Material Considerations**

- NESTRANS 2040 Regional Transport Strategy
- Local Transport Strategy

Reference is made representations by AGS Airports to the Airport Masterplan, which was published in 2013, however it is the airport's own document and has not been adopted by the Council as supplementary guidance forming part of any Aberdeen Local Development Plan. It therefore carries no weight in terms of planning decision making.

## **EVALUATION**

### **Principle of Development**

#### **Establishment of Car Park Use**

The existing car park was established through the decision of the Local Review Body (LRB) in October 2020 to approve the original application (191456/DPP). The reason for the LRB's decision focused on ensuring an adequate supply of on-site parking at the airport for those that do not have access to public transport and that the site was conveniently located in relation to the airport. It was also noted that one of the existing car parks was closed and that it was desirable to ensure ad hoc car parking doesn't occur around the airport. Growth in public transport use for airport trips in recent years, despite the opening of new airport car parks during that period was also noted.

As a decision of the planning authority, the decision by the LRB and the reasons given for approval are material considerations which should be considered alongside other relevant matters in the consideration of the current application. Some of the issues from the consideration of the original application are still valid in the context of the extension, whilst for other matters there has been a change in circumstances. These are discussed below.

#### **Land Use Zoning**

The site is within an area zoned as business and industrial land, where Policy B1 (Business and Industrial) of the Aberdeen Local Development Plan (ALDP) 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.*' It goes on to say that '*The expansion of existing concerns and uses within these locations will be permitted in principle.*'

In the original application, the Planning Service considered that whilst an airport car park is not a business or industrial use in terms of the policy, a car park could be consistent with the general purpose of the policy. It is not a sensitive use which could be affected by surrounding industrial uses or noise generated by the airport. It would sit comfortably alongside the existing uses in the area and would be one which it would not be unusual or unreasonable to find such a use within a business park adjacent to an airport.

In terms of the extension, this continues to be the position of the Planning Service. Over and above this, as the car park is now an established existing use, in terms of the land use zoning its expansion is acceptable in principle in terms of Policy B1. Given the small size of the site at 0.62ha, there is no concern with the alternative use of the site impacting on the availability of business and industrial land in the city.

#### **Airport as Key Infrastructure**

National Planning Framework 4 (NPF4) explains that '*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.'*

Both the ALDP and Proposed ALDP identify the airport as *'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.'* NPF4 and the ALDP therefore lend support towards development which helps ensure that important infrastructure, such as the airport, can operate effectively. It is essential that the airport is accessible from within the catchment that it serves and supported by a variety of transport options.

More specifically, through the decision of the LRB, the planning authority has taken the position that the car park in this location would help to contribute to the effective operation of the airport. Notwithstanding, as the proposal is now to further increase the level of parking, the proposals must be considered against sustainable transport policies to determine whether this would be appropriate.

## **Sustainable Transport**

### Policy Context

The NESTRANS 2040 Regional Transport Strategy (RTS) published in November 2021 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 identifies as a key consideration the role of an Airport Surface Access Strategy. The opening of the Aberdeen Western Peripheral Route (AWPR) and upgraded road network in and around Dyce have made a significant contribution to improving the attractiveness of the Airport and have increased the catchment within an hour's drivetime to over 500,000 people. Public transport access, however, is noted as being less attractive. Despite rail improvements and new bus services directly to the terminal, just 12% of passengers currently arrive by public transport.

NESTRANS indicates that it wishes to work with the airport and the operators of TECA/P&J Live, bus operators, rail operators and others to produce an Airport Surface Access Strategy and develop a range of options for airport users. The RTS identifies that this should include targets for public transport usage for trips to / from the airport and include consideration of innovative or nonconventional links, along with options for rail enhancements, connections to the rail network and parking controls to encourage more sustainable travel and ensure that options are available for travellers coming from across the region. A Surface Access Strategy would also be expected to look at the role of and provision for taxis, pedestrians and cyclists, as well as cars, car sharing opportunities and public transport in getting both passengers and staff to the sites, bearing in mind its hours of operation.

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.

Policy 13 (Sustainable Transport) of NPF4 seeks to *"encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably"*.

Policy T2 (Managing the Transport Impact of Development) of the ALDP 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) of the ALDP, 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 Transport and Accessibility Supplementary Guidance (SG) states that the over-provision of parking spaces can 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. 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. There is no parking standard which applies to the airport, with parking provision for it and similar developments being considered on their merits.

In considering the original application to establish the car park, the Planning Service found that increasing car parking capacity at the airport was 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. It was accepted that alternatively, there was an argument that in theory additional car parking could divert passengers from being dropped off at the airport and therefore reduce the number of trips to the airport (two trips for someone parking, compared to four trips for someone being dropped off on departure and collected on arrival). It was considered no evidence was provided that there is any lack of capacity in existing long stay car parks, which may be encouraging passengers towards being dropped off rather than parking. The availability of public transport options was also considered, with the Planning Service concluding that at the time the proposal could not be supported.

#### Existing Situation – Overall Parking Provision

There are several other sites which offer airport parking, are about to become active or which could increase capacity if reactivated.

- Airport Long Stay Car Park at Montrose Road has 1,007 spaces and is and is understood to operated directly by the Aberdeen International Airport.
- Airport Short Stay Car Park opposite the main terminal has 1,247 spaces and is understood to operated directly by the airport.
- After being used temporarily as a COVID-19 test centre during since 2020, the Aberdeen Airport Park and Depart car park at Wellheads Drive, with spaces for 530 vehicles, which

according to its website re-opens on 1 April 2023. It is understood to be operated by APCOA on behalf of the of the airport.

- 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. Towards the end of 2022 the owner advised that that facility would be re-opening imminently, with initial capacity for 750 vehicles but the ability to increase that to 1,300 if demand is sufficient. However, it does not yet appear to have re-opened.
- Several airport hotels and some in Dyce 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.

### Existing Situation – Existing Car Park

With the benefit of the car park now existing and having been in operation since July 2022, the applicant has been able to provide information on customer usage of car park thus far, which understandably was not available at the time of the original application. The occupancy levels and average length of stay since opening during July 2022 are shown in the table below, but in summary it shows an average occupancy level of 87% over the eight months the car park has been open and an average duration of stay of seven days.

	Jul (part)	Aug	Sep	Oct	Nov	Dec	Jan	Feb
<b>Occupancy</b>	73%	82%	96%	92%	83%	90%	95%	90%
<b>Average Stay (days)</b>	7.9	7.4	7.4	7.1	6.2	7.9	6.1	6.1

Separate information has also been provided by the applicant as to where customers using the car park have originated. This shows that 76% of those using the car park are from outwith Aberdeen City (including Westhill). This can be broken down into 46% from Aberdeenshire and 30% beyond. Only 24% of those using the car park are from Aberdeen City or Westhill. It is therefore necessary to consider what the alternatives for reaching the airport are for those whose journey will originate from outwith the city.

### Existing Situation – Public Transport

Since the previous application was determined in May 2020, circumstances in terms of public transport provision to the airport have changed. The 747 and 757 services, introduced in 2019, provided a direct connection to the airport from Ellon, Newtonhill, Portlethen Stonehaven and Montrose by utilising the newly opened AWPR. However, the 757 service ended in August 2019 and the 747 service ended in 2021. The X27 service, which provided a link between the city centre, airport and Dyce railway station, ended in December 2022.

The Jet 727 route, which provides a frequent service into the city centre and areas between it and the airport, is now the only public bus service to serve the airport. It operates on a frequent basis throughout the day and night and at present the first bus leaves Union Square at 0300 and the last bus arrives back from the airport at 0039. The first fixed wing passenger flights typically begin departing at 0600, with the last flights landing around 2200 to 2230. Helicopter flights are restricted to 0600 and 2230 by a planning legal agreement, whereas there is no planning restriction on fixed wing flights. The 727 route effectively provides a continuous service during airport opening hours.

It is acknowledged that there are programmes in place to enhance connectivity across the city and beyond, including the prospect of a new rail spur to the airport, the desire by NESTRANS to work with partners to produce an Airport Surface Access Strategy and the emerging Aberdeen Rapid Transit (ART) project. Notwithstanding, planning applications require to consider the circumstances at the time a decision is made. Taking each of the programmes mentioned into account, a new rail spur from the existing rail line into TECA and the airport has been considered but found to be impractical due to high capital costs, the need for land purchase, property demolitions and impacts on the existing rail line between Aberdeen and Inverness. The Airport Surface Access Strategy is still to be produced and the ART project is at the visioning stage, with the system expected to begin operating in 2030. Whilst expected future changes in circumstances can be taken into account, of the programmes which are progressing, they are at too early a stage to be considered as significant material considerations in the determination of this application.

### Consideration of Transport Policies

Taking the above into account, it would appear the majority of those using the car park originate from areas of the north east where there is no direct public transport connection to the airport. Whilst it is accepted that it would be possible to take public transport into the city centre from many of the larger settlements in Aberdeenshire and further afield, to then get the 727 service to the airport, this could involve using several different bus services (possibly passing the airport area to access the city centre, then changing buses to travel back to Dyce) and take a considerable amount of time, often more than double that it would take by car. Taking account that passengers would normally have luggage and potentially children accompanying them if on a family holiday and potentially catching an early morning flight or returning in the evening, it is considered that for a vast majority of people who live outwith the city, the option of using public transport to reach the airport is not going to be an attractive one or indeed in many cases even possible. It is therefore desirable to ensure that there is sufficient parking associated with the airport so that those who do drive there have a range of options available.

That said, it is accepted that provision of additional parking creates tension with the suite of regional and local transport related policies which seek to reduce car usage. Policy 13 (Sustainable Transport) of NPF4 seeks to *'encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably'*. As outlined above, and in the context of the priorities that Policy 13 advocates, for many traveling to the airport, the public transport options are limited, whereas walking, wheeling or cycling will not be viable or suitable for the majority of those using the airport to catch a flight due to the distances involved or accompanying luggage. The emphasis on using these modes of transport for *'everyday travel'* is also important. Whilst offshore workers and businesses passengers may use the airport fairly regularly, most passengers would be using it far less regularly and therefore travel there their usage could not be described as everyday travel.

Additionally, of relevance to this proposal is part (d) of Policy 13 which indicates that *'development proposals for significant travel generating uses will not be supported in locations which would increase reliance on the private car, taking into account the specific characteristics of the area'*. Whilst it's the airport that is the significant travel generating use, rather than the car park itself, the principles of the policy which seek to reduce reliance on the private car are still relevant. Of note however, is that the *'specific characteristics of the area'* need to be taken into account when considering a proposal. In this case, the airport, in terms of how it is accessed, cannot be treated the same as a typical development, such as a workplace, retail or leisure development. Likewise, compared to other uses, the airport has a very large catchment area, with passengers traveling from across the north east and beyond to use it. It also operates very early in the morning and late at night, when there is less availability of public transport options outwith Aberdeen. Therefore, for

a large number of passengers the most viable option will be using the private car. It is considered that the specific characteristics of the airport is a significant material consideration which lends weight to departing from the normal approach taken by transport policies.

Policy T2 (Managing the Transport Impact of Development) of the ALDP requires it to *'be demonstrated that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel'*. The policies caveat the requirement by indicating that it must be demonstrated only insofar as it is *'commensurate with the scale and anticipated impact of the development'*. In this case it is considered that the provision of the additional car parking has the potential to reduce the instances of drop-off/pickup trips which are the least sustainable mode of transport to the airport. The Roads Development Management Team note that there is no guarantee that the extra parking would achieve this, however it is anticipated that increased capacity could enhance competition between car park operators which could then make parking whilst away (two car trips) more attractive than being dropped off and picked up (four trips). The airports charging scheme for those wishing to drop-off, currently set at a minimum of £5, should also make dropping off an increasingly less attractive option, although it is acknowledged that anecdotally passengers will often be dropped off at points outwith the charging zone to avoid paying the fee.

Whilst it has been established that there is legitimate demand for parking at the airport, as for many there will be no other viable option, it has not been demonstrated that there is a deficiency in overall airport parking capacity. Indeed, it is difficult to know if there is an undersupply capacity as it is hard to determine what that capacity should be; data on current overall demand is not available; and other than for the car park in question, levels of occupancy (as noted above) are not available. Notwithstanding, the applicant has demonstrated that their car park is well used, and demand is high, with an average occupancy of 87% and as high as 96% since opening.

In terms of maximising opportunities for sustainable and active travel, the location of the site would be convenient in terms of its proximity to the airport main terminal, with a 500m walk door-to-door, largely being via existing covered walkways, which takes around 5-6 minutes. Compared to the other airport car parks, it is in a more convenient location, with the long-stay car park at Montrose Road being around 650m walk away and the route being more convoluted, whilst the Park and Depart at Wellheads Drive is 2.5km away. The close proximity of the car park to the airport terminal and ability to walk between the two locations is also acknowledged and in terms of Policy T2 contributes somewhat (compared to the other car parks) to the aim of maximising opportunities for sustainable and active travel during the part of the journey between the car park and airport. Notwithstanding, as mentioned in the original application, there is the potential that this positive aspect of the location actually encourages people to drive to the airport due to the convenience, therefore the location close to the terminal cannot be seen as an entirely positive aspect of the proposal. However, given this application is for an extension, rather than establishing a new car park, the weight attached to this aspect of the matter is significantly less than in the original application. Related to this, AGS Airports in its representation does indicate that the applicant provides a shuttle bus service at the existing car park, however the applicant has advised that this is not the case, and this appears to be confirmed by the operator's website. Nonetheless, the car park is most readily accessible of the airport car parks and can be reached by a short walk from the terminal.

In summary, whilst there would be tension with local, regional and national policies aimed at reducing car usage, as is highlighted by the Road Development Management Team and AGS Airports, the airport is an exceptional case that requires to be treated differently from normal developments, which is something which national policy and to a lesser degree local policy recognises in certain circumstances will need to occur. It has been determined that for those living in a large part of the north east or beyond, travelling to the airport by public transport will not

be a viable or realistic option. It is difficult to determine appropriate levels of parking capacity or to have an overall understanding of airport parking demand through a single planning application, however given the need to ensure that passengers from across the north east have the ability to access the airport, and given the small increase in parking provision which this application would provide, it is considered that at this point in time and on balance, the proposal should be supported. A condition is proposed to ensure that the car park is used by passengers at the airport rather than for general use.

## **Traffic**

The submitted transport assessment expects that vehicle arrivals and departures to be spread throughout the day rather than being focused on AM and PM peak hours typical of a business park, the use that the site was originally consented for.

The resulting peak hour vehicle trips is therefore expected to be less than what would be generated by business use. The resulting traffic impact on the wider road network during the AM and PM peak periods is therefore expected to be less than what would be expected from any business use development that could be developed on the site under the existing planning consent. No improvements are therefore required to the road network.

## **Electric Vehicle Charging**

Twelve active electric vehicle charging (EV) spaces are located within the existing car park, with no further spaces proposed as part of the extension. The policy requirement for the extended car park is six active and six passive spaces and therefore twelve active spaces would exceed the requirement. To ensure efficient use of the EV spaces, customers wishing to have their car charged, must leave the keys with car park staff so that once charging is complete, staff can move the cars to a regular parking space to free-up the charging space for any other electric vehicles. Theoretically, the twelve EV spaces have the ability to each charge eight cars from full to empty per day, or 96 cars overall. In reality the capacity will be significantly higher as for example few cars will arrive with fully depleted batteries and some vehicles will be hybrid with smaller batteries which take a shorter time to charge. The EV charging provision is considered acceptable.

## **Drainage**

Policy 22 (Flood Risk and Water Management) of NPF4 seeks to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

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

It is proposed that surface water drainage for the parking area would drain through porous hardcore/gravel and then disperse into the ground. There are no facilities within the car park extension that would require a foul drainage connection and no identified risk of flooding.

The drainage proposals are considered acceptable and would provide the necessary treatment of surface water in accordance with Policy 22 and Policy NE6.

## **Climate Change and Nature Crises and Biodiversity**

Policy 1 of NPF4 requires planning authorities when considering all development proposals to give significant weight to encouraging, promoting and facilitating development that addresses the global climate emergency and nature crisis.

Similarly, Policy 2 of NPF4 encourages, promotes and facilitates development that minimises emissions and adapts to the current and future impacts of climate change. Of more relevance to this proposal is the requirement that development proposals must be sited and designed to adapt to current and future risks from climate change.

Whilst there is an inherent tension between the provision of infrastructure for the private car and addressing climate change and nature crises, as explained above it is considered that that given the regional catchment of the airport and unique situation in terms of surface access to it, the provision of the car park extension is acceptable. The wider issue of demand for air travel which has a significant impact on climate change is considered beyond the remit of determining this application.

In terms of the design of the development, as considered in the Drainage section of the report, the proposal would have regard to climate change through dealing with surface water on site via a SUDS feature. The site is also not known to be at risk of flooding and the development would not increase the risk of flooding to the site or others. The planting of trees would help expand tree cover in the city and increase the capacity to capture and store carbon.

In terms of the nature crisis, proposed tree and landscaping planting around the site perimeter areas, would contribute to enhancing biodiversity, as at present the site has no vegetation. These aspects also align with Policy 3 of NPF4, which seeks to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.

## **External Lighting**

Eight new 8m high lighting columns would be installed throughout the car park extension. Each would be fitted with LED luminaires, design to minimise any light spillage.

## **Aviation Safeguarding**

The site lies within the Aberdeen International Airport safeguarded area and Policy B4 (Aberdeen Airport) of the ALDP requires that within safeguarded areas development not compromise the safe operation of the airport. The airport has been consulted and confirm there would be no objection to the development proceeding, subject to a condition requiring the approval and implementation of a bird hazard management plan.

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

## **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 and therefore the proposal is acceptable in terms of both plans for the reasons previously given.

## **RECOMMENDATION**

Approve Conditionally

## **REASON FOR RECOMMENDATION**

Whilst an airport car park is not a business or industrial use in terms of Policy B1 (Business and Industrial Land), a car park could be consistent with the general purpose of the policy. It would sit comfortably alongside the existing uses in the area and would be one which it would not be unusual or unreasonable to find such a use within a business park adjacent to an airport.

Whilst there would be tension with the Local Transport Strategy, NESTRANS 2040 Regional Transport Strategy and national policies aimed at reducing car usage, as is highlighted by the Road Development Management Team and AGS Airports, Aberdeen International Airport is an individual, exceptional case that requires to be treated differently from normal developments, which is something which National Planning Framework 4 and to a lesser degree the Local Development Plan recognises in certain circumstances. It has been determined that for those living in a large part of the north east or beyond, travelling to the airport by public transport will not be a viable or realistic option. Given the need to ensure that passengers from across the north east have the ability to conveniently access the airport, and given the small increase in parking provision which this application would provide as an extension to an existing facility, it is considered that at this point in time and on balance, the proposal should be supported despite the tension with Policy T2 (Managing the Transport Impact of Development) and Policy T3 (Sustainable and Active Travel) of the Aberdeen Local Development Plan (ALDP).

Other technical matters relating to traffic, aviation safeguarding drainage are considered to be acceptable in relation to Policies B4 (Aberdeen Airport) and NE6 (Flooding, Drainage and Water Quality). Sufficient regard has been had to policies within National Planning Framework related to the Climate and Nature Crises (Policy 1), Climate Mitigation and Adaptation (Policy 2) and biodiversity (Policy 3).

The relevant Proposed ALDP policies substantively reiterate those in the adopted ALDP and therefore the proposal is acceptable in terms of both plans for the reasons previously given.

In terms of the nature crisis, proposed tree and landscaping planting, although minimal, would contribute to enhancing biodiversity, as at present the site has no vegetation. These aspects also align with Policy 3 of NPF4, which seeks to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks.

## **CONDITIONS**

### **(01) DURATION OF PERMISSION**

The development to which this notice relates must be begun not later than the expiration of 3 years beginning with the date of this notice. If development has not begun at the expiration of the 3-year period, the planning permission lapses.

Reason – in accordance with section 58 (duration of planning permission) of the 1997 act.

### **(02) BIRD HAZARD MANAGEMENT PLAN**

No development shall take place unless a Bird Hazard Management Plan has been submitted to and approved in writing by the planning authority, in consultation with Aberdeen International Airport. The submitted plan shall include details of –

- Earthworks, soil stripping and excavation works.
- Monitoring of any standing water within the site whether temporary or permanent.

Thereafter, the Bird Hazard Management Plan shall be implemented as approved, on completion of the development and shall remain in force for the life of the development. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the planning authority in consultation with Aberdeen International Airport.

Reason – to minimise the development's attractiveness to birds which could endanger the safe movement of aircraft and the operation of Aberdeen International Airport.

### (03) LANDSCAPING

No development shall take place unless a scheme of landscaping for the site has been submitted to and approved in writing by the planning authority. The scheme shall include the proposed areas of tree/shrub planting including details of numbers, densities, locations, species, sizes and stage of maturity at planting.

Thereafter, all planting, seeding and turfing comprised in the approved scheme of landscaping shall be carried out in the first planting season following the completion of the development and any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a size and species similar to those originally required to be planted, or in accordance with such other scheme as may be submitted to and approved in writing for the purpose by the planning authority.

Reason – to satisfactorily integrate the development into the surrounding area and enhance biodiversity.

### (04) DRAINAGE

The car park shall not be brought into operational use unless all drainage works detailed in the Drainage Assessment (ref: 151781 DA01) or such other plan as may subsequently be approved in writing by the planning authority for the purpose have been installed in complete accordance with the said plan.

Reason – to safeguard water qualities in the adjacent watercourse and to ensure that the proposed development can be adequately drained.

### (05) EXTERNAL LIGHTING

The car park shall not be brought into operational use unless all external lighting detailed in the drawing WWL-XX-XX-PL-U96002 (Rev. P03) by Wallace Whittle, or such other plan as may subsequently be approved in writing by the planning authority for the purpose have been installed in complete accordance with the said plan.

Reason – to ensure the site is adequately lit.

## (06) CAR PARK USEAGE

The car park hereby approved shall be used only for the parking of vehicles belonging to passengers taking flights to and from Aberdeen International Airport and any ancillary activity.

Reason – to ensure that the car park is not used as a general parking facility which would undermine efforts to encourage the use of more sustainable modes of transport within Aberdeen.

## **ADVISORY NOTES FOR APPLICANT**

### (01) SAFEGUARDING OF ABERDEEN INTERNATIONAL AIRPORT (CRANES)

Attention is drawn to the requirement within the British Standard Code of Practice for the Safe Use of Cranes (BS7121), specifically section 9.9.3 (Crane Control in the Vicinity of Aerodromes) which requires the responsible person to consult the aerodrome manager for permission to work if a crane is to be used within 6km of an aerodrome and it's height would exceed 10m or that of surrounding trees and structures.

Use of cranes, or other tall construction equipment must be notified to Aberdeen International Airport Safeguarding Manager ([abzsafeguard@aiairport.com](mailto:abzsafeguard@aiairport.com) / 01224 725756) at least one month prior to use. Failure to do so may result in any responsible person being guilty of an offence under Article 137 (Endangering Safety of Aircraft) of the Air Navigation Order (CAP 393) which states that a person must not recklessly or negligently act in a manner likely to endanger an aircraft.

### (02) SAFEGUARDING OF ABERDEEN INTERNATIONAL AIRPORT (LIGHTING)

Developers and applicants are advised to ensure that all permanent lighting, construction lighting, or illuminated signage, within the development site must be of a type which does not cause spillage of light above the horizontal, or include strobe, laser or flashing light.

Failure to do so may result in any responsible person being guilty of an offence under Article 135 (Dangerous Lights) of the Air Navigation Order (CAP 393) which states that a person must not exhibit any light which (i) by reason of its glare is liable to endanger aircraft taking off from or landing at an aerodrome or (ii) by reason of its liability to be mistaken for an aeronautical ground light is liable to endanger aircraft.

Further information can be obtained from Aberdeen International Airport Safeguarding Manager ([abzsafeguard@aiairport.com](mailto:abzsafeguard@aiairport.com) / 01224 725756).