

## **ED12: EXPLANATORY NOTE ON OFF-AIRPORT CAR PARKING**

### **Introduction**

The local planning policy on off-airport car parking (OACP) has evolved between 2004, when it first appeared in the RLP Second Deposit Draft, and 2015, when it was expressed as Policy DM30 of the DMP Publication Version. This note summarises the process.

### **North Somerset Replacement Local Plan: First Deposit Draft (September 2002)**

In this document, the policy for Bristol Airport (Policy T/12) made no reference to OACP. Officers were at this time dealing with a number of enforcement cases relating to OACP in the Green Belt and considered that a specific policy reference to the issue would assist in handling any future cases. Wording was therefore drafted for inclusion in the Second Deposit Draft.

### **North Somerset Replacement Local Plan: Second Deposit Draft (March 2004)**

In this document, OACP was the subject of a sentence added to the end of Policy T/12:

*“Car parking for the airport will be limited to on-site provision; airport-related parking in other locations will be resisted.”*

This approach was set in the context of the Airport Surface Access Strategy (SAS), which formed Appendix B to the 2000 Local Transport Plan and which sought to promote public transport to encourage modal shift from cars. Para. 9.135A of the Second Deposit Draft explained that:

*“The provision of off-airport parking could undermine the SAS and will be resisted. It is also desirable in terms of containing its impact on the openness of the Green Belt that airport-related development should be accommodated within the airport complex where possible and not on other Green Belt sites.”*

### **North Somerset Replacement Local Plan: Further Pre-Inquiry Changes (March 2005)**

In November 2004, Full Council considered proposed amendments to the Second Deposit Draft in the light of representations received. These Further Pre-Inquiry Changes (FPICs) were published for consultation in March 2005. Two changes, Vol/1/FPIC/041 and Vol/1/FPIC/055, related to OACP and reversed the policy that had been introduced at Second Deposit.

Council considered Policy T/12 to be over-restrictive in relation to OACP in that it would exclude the possibility of parking provision in otherwise acceptable locations.

It supported replacement of the last sentence with new wording stating that, except within the Green Belt, OACP will be permitted where there are no unacceptable consequences for environmental, local amenity, landscape, highways or traffic considerations.

For consistency, Council also supported replacement of the second sentence of para. 9.135A with new wording stating that:

*“It is desirable in terms of containing its impact on the openness of the Green Belt that airport-related car parking within the Green Belt should be limited to on-site provision. This is in line with Policy RD/5 [development in the Green Belt]. Elsewhere, such parking will be permitted subject to detailed considerations.”*

### **North Somerset Replacement Local Plan: Council’s Proof of Evidence (July 2005)**

Officers gave further consideration to the issues raised by objectors to the FPICs. The FPIC wording, creating a presumption in favour of development outside the Green Belt, would not have been consistent with the Airport Surface Access Strategy. It was not considered by the relevant officers or by Counsel to be defensible.

A revised wording was agreed by the Council’s Executive Member for Strategic Planning and, signed-off by the Director of Development and Environment, this formed the basis of the Council’s evidence to the Inquiry. This wording sought to define more precisely what locations, besides the airport, were acceptable locations for airport-related parking. In doing so, it sought to maintain the Council’s position that parking should not be restricted exclusively to the airport but equally is not to be encouraged in areas where unacceptable environmental harm could result. Read in conjunction with all other Plan policies, the further amended wording was considered to provide adequate environmental safeguards. The wording *“will be resisted”* was preferred to *“will not be permitted”*, the former being more positive without being laissez-faire.

The further amended wording put forward for discussion was:

*“Car parking for the airport will be resisted except in the following locations:*

- (a) within the airport operational area;*
- (b) in association with overnight accommodation, where the number of customer parking spaces on-site does not unreasonably exceed the number of bedrooms (in no case by more than three times the relevant parking standard specified by Policy T/6) and there is a demonstrable relationship between the two;*
- (c) within the settlement boundary of Weston-super-Mare or within the Weston Regeneration Area, where the provision is planned as part of an integrated transport strategy for the town and its surroundings that contributes to the creation of more sustainable travel patterns.”*

*“9.135A The provision of off-airport parking could undermine the ASAS and needs to be tightly regulated. It is also desirable in terms of containing its impact on*

*the openness of the Green Belt that airport-related development should be accommodated within the airport complex and not on other Green Belt sites. Policy T/12 recognises that limited opportunities for off-airport parking exist that are compatible with this approach. There may be opportunities associated with the regeneration of Weston-super-Mare that contribute towards improved public transport between the town and the airport.”*

Clause (b) was developed in discussion with the Council’s highways development control officer. It acknowledged Members’ concerns that the airport should not have a parking monopoly but that any exceptions to the rule should not harm the Green Belt or discourage the use of public transport where it might otherwise be a viable option.

The figure of 3x was originally related to the maximum car parking standard in Policy T/6. In the Second Deposit Draft, the standard for C1 uses (hotels, boarding and guest houses, motels) was 0.9 space per bedroom plus 1 per 3 staff (subject to a series of negative multipliers producing a series of lower standards in the towns that was related to their public transport accessibility). The proposed wording of T/12 would therefore have produced a maximum of 0.9 x 3, or 2.7 spaces per bedroom, plus any allocation for staff. The schedule to Policy T/6 states that *“Provision is normally to be limited to the number of whole spaces resulting from the calculation, disregarding any additional fraction.”* Applying this rule, the maximum provision would therefore have been 2 spaces per bedroom, apart from any staff spaces that were under-used and therefore available for customer use. The rationale for this is that, at any one time, 1 space would be used by customers present in the accommodation and 1 would be used by other customers to park whilst away on a flight. A more relaxed interpretation would regard this policy as an exception to the ‘normal’ disregarding of fractions. In that case, 3 spaces would be available, 2 of them for absent customers. Assuming that customers stay one night at the beginning and one night at the end of their journey by air, and that absences are on average for around one week, this equates to six overnight bookings per week. OACP provision beyond this would therefore be unlikely to be able to establish a demonstrable relationship to the number of bedrooms.

### **North Somerset Replacement Local Plan: Inspector’s Report (April 2006)**

The Local Plan Inspector’s final report had the following to say about OACP:

*“48.1 The Council has received opposing counter-representations each time it has sought to change the draft plan in response to representations on successive Deposit Drafts and Proposed Changes. Initially, in the First Deposit, the issue was not addressed, but in response to representations that the plan should contain a basis for the enforcement action that has been pursued against scattered airport-related parking sites in the vicinity of the airport, a rider was attached to policy T/12 supported by a new paragraph 9.135A. This attracted objection that the policy would represent a fundamental interference in the operation of the free market by in effect giving BIA a monopoly of provision and in FPIC/055 the Council proposed a relaxation to accept off-site parking outside the Green Belt. In turn this attracted objection not only from BIA but also from local community interests.*

48.2 Clearly, a policy that would have the effect of interfering with the operation of the free market cannot be lightly countenanced, but it seems to me that the proposed supporting text gives two very good reasons for seeking to concentrate parking, namely to further the Airport Surface Access Strategy (ASAS) and to minimise harm to the visual amenities of the Green Belt. I put it that way as if the car parking were all to be provided as surface parking the land area lost to the Green Belt around the airport would be the same whether on-site or nearby. However, I have earlier supported the main thrust of the Council's case for encouraging the maximum extent of multi-storey parking that can be reasonably achieved in the valley north of the terminal. To the extent to which surface parking is still required, in my judgement, extensive landscaping and screening is most likely to be achievable if it is provided in a concentrated form.

48.3 Even if some pockets of parking might be able to be located elsewhere on land that is already well-screened or within existing buildings, a scatter of sites will inevitably hinder the strategy of minimising vehicular movements on the approaches to the airport and particularly that on unsuitable minor roads. Only where parking away from the terminal is on a large scale, as on the south side of the airport, will it be efficient to transfer users to/from the terminal or airport place of work by bus. I agree with the Council that Messrs Pearce appear to misunderstand the operation of Green Belt policy. If re-use of a building is involved this would not normally constitute inappropriate development as is made clear in paragraph 3.8 of PPG2. Demonstration of very special circumstances would not therefore arise. However, the objection in relation to the ASAS would be likely to remain. This would be the situation with regard to the re-use of the former Avon Cattle Market at Winford considered in chapter 8 under policy H/2 sites. Thus, even if an allocation is not strictly precluded by the terms of PPG2 in relation to the re-use of an existing building, I do not consider that such an allocation for airport parking would be warranted.

48.4 In Mr Robins' Proof CP/0034, the Council put forward further compromise proposals both for the rider to policy T/12 and the supporting text in Paragraph 9.135A. Broadly speaking these were accepted by the local community interests appearing at the Inquiry and by BIA in so far as they now only accept off-site provision at hotels or at Weston. BIA and Mr Glynn question the feasibility of the latter. I find it difficult to contemplate how securing appropriate land would be achieved at a location where urban development values would be anticipated of a scale to accommodate the 1000 or more spaces estimated by BIA to be necessary to justify a dedicated bus service. The Weston Vision Plans do not make this clear as yet. However, conceptually as Weston is expected to provide residence for many airport workers and it is intended to seek to enhance bus services between Weston and the airport it would seem wrong to rule out the possibility if a means of bringing it to fruition can be devised. Consequently, I shall recommend insertion of the text essentially as finally put forward by the Council subject only to the clarification and simplification discussed at the Inquiry. I consider that the requirements of policy T/12 itself and other relevant policies will provide sufficient environmental safeguards.

## Recommendation

48.5 I recommend that the rider to policy T/12 be modified to read as follows:

*“Car parking for the airport will not be permitted except in the following locations:*

- a) within the airport operational area or any agreed extension thereto;*
- b) in association with overnight accommodation, provided that the number of parking spaces on site does not exceed three times the number of bedrooms;*
- c) within the settlement boundary of Weston-super-Mare or within the Weston Regeneration Area, where the provision is planned as part of an integrated transport strategy for the town and its links with the airport that contributes to the creation of sustainable travel patterns.”*

48.6 I recommend that Paragraph 9.135A be modified so that it reads as follows:

*“The provision of off-airport parking could undermine the ASAS and needs to be tightly regulated. It is also desirable in terms of minimising impact on the openness of the Green Belt that airport-related development should be accommodated within the airport complex and not on other Green Belt sites. policy T/12 recognises that there are only limited opportunities for off-airport parking that are compatible with these objectives. There may be opportunities associated with the regeneration of Weston-super-Mare that contribute towards improved public transport between the town and the airport.””*

## North Somerset Replacement Local Plan: Proposed Modifications (June 2006)

The Inspector’s Report was considered by Full Council in June 2006.

The recommended amendment to the policy was accepted, subject to changing (a) to read *“within the Green Belt inset at Lulsgate, subject to iii) [landscape impact] above”* and at the end of (c) to read *“creation of more sustainable travel patterns”*. These changes were made for consistency with the Inspector’s recommendation for a Green Belt inset and to confirm application of the landscape test to car parking within the inset; (c) was changed because sustainable travel patterns are relative, not absolute.

The recommended amendment to para. 9.135A was accepted, subject to changing *“airport complex”* to *“Lulsgate inset”* and inserting a comma between *“other”* and *“Green Belt sites”*. These changes were made for consistency with the Inspector’s recommendation for a Green Belt inset.

## North Somerset Replacement Local Plan: Adopted Plan (March 2007)

The final wording of T/12 as adopted includes the following statement on OACP, which incorporates the Proposed Modifications:

*“Car parking for the airport will not be permitted except in the following locations:*

- a) within the Green Belt inset at Lulsgate, subject to iii) above;*

- b) *in association with overnight accommodation, provided that the number of parking spaces on site does not exceed three times the number of bedrooms;*
- c) *within the settlement boundary of Weston-super-Mare or within the Weston Regeneration Area, where the provision is planned as part of an integrated transport strategy for the town and its links with the airport that contributes to the creation of more sustainable travel patterns."*

The reasoned justification is now at para. 9.110:

*"The provision of off-airport parking could undermine the ASAS and needs to be tightly regulated. It is also desirable in terms of minimising impact on the openness of the Green Belt that airport-related development should be accommodated within the Lulsgate Inset and not on other Green Belt sites. Policy T/12 recognises that there are only limited opportunities for off-airport parking that are compatible with these objectives. There may be opportunities associated with the regeneration of Weston-super-Mare that contribute towards improved public transport between the town and the airport."*

The published edition is in error in not including the comma between "other" and "Green Belt sites".

### **North Somerset Core Strategy: Adopted Plan (April 2012)**

The Core Strategy introduced a new policy, CS23, for Bristol Airport. This is a strategic policy and does not supersede T/12. Para. 3.295 states that:

*"The policy relates to the development of Bristol Airport only. Off-site car parking is regulated separately (Replacement Local Plan Policy T/12) and the Core Strategy proposes no change to this approach."*

### **North Somerset Sites and Policies Plan: Consultation Draft (February 2013)**

This document proposed two new policies – DM30 and DM54 – to replace T/12. DM30 is the policy dealing with OACP:

*"Airport-related car parking additional to that approved at Bristol Airport or acceptable under Policy DM54 (Bristol Airport) will only be permitted in association with overnight accommodation located on the same site, provided that the number of car parking spaces does not exceed three times the number of bedrooms."*

This wording rolled forward the RLP approach, omitting references to Weston-super-Mare, where opportunities have now been discounted. It also tightened the definition of 'on site' to clarify that the site used for OACP must be the same as the site containing the accommodation.

## **North Somerset Sites and Policies Plan Part 1: Development Management Policies: Publication Version (February 2015)**

This document confirmed the inclusion of the two new policies – now numbered DM30 and DM50 – to replace T/12. DM30 is the policy dealing with OACP. The wording is now revised as follows (substantive changes from the Consultation Draft are underlined):

*“Outside of the Green Belt, airport-related car parking additional to that approved at Bristol Airport or acceptable under Policy DM50: Bristol Airport will only be permitted in association with existing overnight accommodation located on the same site, provided that the number of car parking spaces does not exceed three times the number of bedrooms.”*

The adopted North Somerset Parking Standards SPD (November 2013) sets out the Council's current parking standards and is considered more up-to-date than RLP Policy T/6. For C1 uses, it sets a required standard of 1 space per bedroom plus 1 space per 3 staff. The relationship originally created with T/12 and now to the emerging DM30 is therefore preserved. OACP provision allows the required standard per bedroom to be trebled, beyond which point the policy acts as a cap on further provision.

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