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Has the location of the car parking been justified?

Policy T/12 of the North Somerset Replacement Local Plan identifies a list of car parking proposals for the airport, including:

- Development inside the Green Belt Inset area;
- Car Parking in association with over night accommodation, provided that the number of parking spaces on site does not exceed three times the number of bedrooms; and
- Car Parking 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.

This approach has been followed by the applicant in their submissions, which has been to:

- Maximise the amount of car parking on the northern side of the airport, within the Green Belt Inset;
- Explore the provision of car parking spaces at locations remote from the airport and outside of the Green Belt; and;
- Explore the provision of car parking spaces in Green Belt locations on or adjacent to BIA land.

BIA submits that the optimum use of the 'Green Belt inset' has been made. The multi-storey car parking (MSCP) is the largest car park of its type within any UK airport. Further car parking cannot be achieved in the Green Belt inset given the landform, air safety requirements, layout and need for other proposed facilities location of surrounding properties and views in and out of the site. Furthermore, options for decking remaining parts of the north side surface car park were considered but not pursued, due to the effect on surrounding properties and following comments from CABE on the design and accessibility.

Advice received from York Aviation (YA) is that the Green Belt inset will be developed in a highly compact manner. The multi-storey car park in particular, is a significant building (approximately 300 metres long x 100 metres deep x 4-5 levels), but its scale and position has been carefully handled to prevent an over-bearing and harmful impact when seen from outside the airport. In fact, some of the lower levels are, due to the sloping topography, partly below ground levels, which reduces the overall height of the structure. The option for increasing its height (even by 1 further deck, or equivalent to 3-metre height increase) is likely to make it much more noticeable when viewed from nearby properties and from passing views, which is unlikely to be supported. There may be limited scope to extend the length of the multi-storey car park to the west, although the option of an easterly extension could have more significant effects on properties in Downside Road.

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The potential for 'decked' parking, which could be in the form of an additional single level car park above surface level car parking (up 5-6 metres above ground levels when considering the height of lifts and lighting columns), may be possible within a very small portion of the north side car park without contributing significantly to the visual impact from outside the airport. However, the benefit of this is limited given that its very construction would result in the removal of a number of surface spaces. However, this cannot be provided close to northern or eastern boundaries without significant impacts on nearby residents.

Some objections contend that the hotel allocation is not required and that this could make way for further multi-storey car parking. The hotel allocation was included in the 2006 Master Plan, the need for which was accepted by the Council following independent advice. The Council has again sought independent advice from York Aviation on the need for a hotel within the site. They have advised that on-site hotels are a normal facility at most UK airports and serve specific needs from passengers wishing to stay close to the airport prior to a departure and for cabin crew and, they can also be used as a point for business meetings for passengers. They also confirm that in comparison to other UK's airports, BIA is by far the largest airport without a hotel site. While the hotel allocation is not part of this application, Officers have advised BIA that any proposal for a hotel must include car parking within the identified area to serve its own demands and not rely on other parking areas. There are no policy objections to the inclusion of a hotel or its general location.

Officers are satisfied that the Green Belt inset would be intensively developed and further development including car parking cannot reasonably be provided in this location. This complies with the objectives of Policy T/12 of the North Somerset Replacement Local Plan.

Thus, if BIA is to provide for 10mppa (which is within the long term forecast of the ATWP), it needs to provide additional car parking outside the Green Belt inset.

Off-site Car Parking outside the Green Belt

The proposed level of car parking to meet 10mppa is accepted. The provision of this must follow a 'sequential test' if it is to be approved in the Green Belt.

Planning policy advocates car parking outside the Green Belt before any proposal for Green Belt sites are pursued.

In terms of off-site car parking, a number of locations have been considered for strategic long-stay park & ride car parks to serve BIA. The basis for this assessment was the viability and attractiveness of locations and their transfer time to BIA being no more than 30 minutes. Furthermore, sites capable of accommodating up to 1800 vehicles were preferred, as this would provide a critical mass to make the option viable. The initial search included sites at Worle, Avonmouth, Ashton Vale, Bedminster Down and Whitchurch, although

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further analysis included the option of sites close to Junctions 20 and 22 and around A370 (Congresbury Area) 22 of the M5. However, all options were discounted as no sites were found to be available and / for planning policy reasons, such as land sensitivity.

There is no provision in the adopted or emerging development plans to use land at Worle (including Worle Railway Station) as a park & ride site for the airport. In time, it may become a viable public transport inter-change from which a future express bus service will run to BIA, but it is not a current proposal.

Any off-airport solution has to offer a link (usually bus access) to the airport, which would have to run at regular intervals throughout the day. Given the relatively low hourly demand from passenger arrivals a bus operation is likely to prove unviable and unsustainable unless the car park is of a significant size. It is more effective in transport terms for there to be central nodes, such as public transport interchanges at Bristol Bus Station and Temple Meads Railway Station, which can be served by an effective bus link. These are addressed in the section dealing with public transport.

With regard to sites in Bristol, such as Ashton Vale and Avonmouth, the consultation response from Bristol City Council makes no reference to land being identified or available for park & ride sites to serve BIA and no reference is made to the possibility of using existing P&R sites to provide a public transport interchange for BIA. Thus, there is no indication that within North Somerset or adjoining authorities who were consulted on the application that satellite car parks outside the Green Belt serving BIA is a short / medium term possibility.

In 2008, the Council refused a retrospective planning application for the temporary use of part of the Langford Mushroom Farm for the parking of approximately 1200 cars in association with airport use. The application was refused due to substandard access arrangements and this was successfully dismissed on appeal. However, the owners are challenging this through the Courts. The appeal will be re-determined but the Council's position remains that the access is substandard.

In terms of over-night accommodation, Policy T/12 of the North Somerset Replacement Local Plan allows 3 parking spaces per bed space. Local short stay accommodation, such as Winford Manor for example provide some off-site parking in conjunction with customer use of this facility. However, the overall level of parking at such local properties is low and is unlikely to have much impact on overall parking demands for the airport.

Some representations suggest that the Council should take a more lenient approach with other forms of off-site car parking, in order to offer customers more choice and to prevent BIA monopolising the market and setting excessive tariffs. However, unlawful off-site car parking merely results in sporadic and unsustainable encroachment in the Green Belt and is unlikely to provide the level or frequency of service to and from the airport, such as that

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provided at the Silver Zone. The Council has taken a firm and consistent line to prevent such parking and has, without exception successfully defended this position on appeal. This confirms this approach is correct and is accepted by the Government.

It is therefore concluded that if BIA is to grow to provide for up to 10mppa, in line with the ATWP, then the provision of adequate car parking is fundamental to the successful operation of the airport. As it has been demonstrated that (1) the public transport access will increase to a challenging 15% (2) the maximum practical use of the Green Belt inset has been made for development and (3) there are no known suitable alternative sites for parking outside the Green Belt, car parking within and contiguous to the airport boundary represents 'very special' circumstances and is a better option than small scale sporadic car parking, which spreads the impact in the Green Belt.

Alternative Options for parking in the Green Belt

During consultation with other Area Committees, Officers were asked to consider whether multi-storey or decked car parking on the south side would be an alternative and better option than surface parking, as this would take up less land in the Green Belt. Decked parking would involve minimum deck heights of 3 metres, but the overall height of buildings would be greater (up to 6 metres above ground level) due to the need for lifts, perimeter safety barriers and lighting columns. Air safety criteria would exclude such development adjacent to the northern and southern boundary of the airfield. BIA submit that decking could reduce the size of the land required for the summer overflow car park (outside the airport boundary) by 33%, but consider the visual impact and environmental case would not justify its provision. BIA also set out that the investment case would not be justified as decked parking costs around 8 times that of surface parking and this would result in an increase in car parking tariffs on the north side.

The proposed additional surface car park is significant development in the Green Belt, but it is unlikely to be prominent having regard to the topography. The fact the car park is unlit will also limit its impact.

The appearance of decked car parking with associated infrastructure and lighting columns is likely to have a much more significant visual impact on the landscape, even though it would mean spread of the surface car park could be reduced. To passing views and a limited number of nearby residents (in the area of Winters Lane) this would have a greater impact on the openness of the Green Belt and there does not appear to be any clear advantage in promoting this as an alternative to surface parking.

Some other developments in the Green Belt, such as various airfield works, occur wholly within the existing operational part of the airfield. These developments are unlikely to harm the openness of the Green Belt, nor result in any encroachment into the open countryside.

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The buildings to be relocated from the north to south side of the airport, including the Royal Mail Hangar and snow base, are also on land within the airport's operational boundary. The Royal Mail building is required to handle and sort mail including arrivals at night. There is no obvious scope to retain the building on the north side of the airport and it is beneficial to have its access away from the service entrance on Downside Road with HGV movements passing residential properties at unsociable hours. This means that there is a 'very special' need for a base to sort and transfer airmail on site before it is dispatched. The proposed snow base is located adjacent to the proposed replacement fire station and is required for services undertaken by the airport fire brigade.

These buildings are required for the efficient operation of the airport and have been discreetly positioned within the current operational boundary and kept as small as practical to reduce their impact.

Conclusions

Further airport car parking is needed if BIA is to grow to serve the number of passengers identified in the ATWP. However, the application has demonstrated that (1) delivering all of car parking within the Green Belt inset is impractical (despite a substantial multi-storey car park) and (2) off-site (satellite) parking for the airport outside the Green Belt is unlikely at this time.

Therefore if BIA is to grow to a level that is consistent with the ATWP, allowing some of the car-parking requirement in the Green Belt is justified as representing 'very special circumstances'. Furthermore, a properly planned and serviced location that is within and contiguous to the airport boundary is the most practical option.

The appearance of the south-side car parking is well contained within the landscape by reason of the topography. Views of the 'seasonal overflow car park' will be possible from Winters Lane with more distant views possible from parts of the Mendip Hills AONB, although additional perimeter planting and no lighting of the car park will reduce its impact. On balance the 'very special circumstances' for the car park outweigh its harm to the openness of the Green Belt and any other harm by reason for inappropriateness.

To ensure that the car parking is not provided until it is required, the additional car parking should be phased and only provided when milestones in passenger numbers are reached or are imminent. This avoids the car parking being provided all at once at the start of the process, and reduces the possibility of the multi-storey car park (which may be one of the most costly constructions) not being delivered. Planning conditions 7, 8 and 9 are recommended to deal with this matter.

The case for the proposed new buildings in the Green Belt is also 'very special' in that they are essential to the proper functioning of services already carried out at the airport and cannot be retained in their present location without reducing the intensity and functional arrangement of the proposed

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development within the Green Belt inset. In the case of the snow base, this is required to house vehicles / equipment needed to clear and make safe airside areas in the event of adverse weather. They are also contained in the in operational area of the airport and are clustered close to existing building, such that their overall impact on the openness of the Green Belt is insignificant compared to their need. They cannot be located on other sites outside the Green Belt.

Overall, it is considered that very special circumstances have been demonstrated for development in the Green Belt and that these outweigh harm to the openness of the Green Belt and purposes of including land in the Green Belt.

Issue 9: Economic Impact

The starting point for an assessment of the economic impact of the development is the Air Transport White Paper, which supports the case for the expansion of regional airports. Subsequent Government policy papers have not changed the principal thrust of Government policy in this regard. The points made by third parties are acknowledged. However the Airport contends in an additional response submitted in January 2010 that the conclusions reached by objectors are flawed and that the data has been misinterpreted.

PPS4 "Planning for Sustainable Growth" states that Local Planning Authorities should adopt a positive and constructive approach towards planning applications for economic development (which include the airport)

The Council have sought independent advice on the economic issues that are likely to arise. York Aviation has undertaken the following analysis of data produced by the Airport;

- An evaluation the air traffic forecasts proposed by BIA;
- Consideration of the economic impact assessment prepared in support of the application and whether the economic case as presented has been made. For example, in the Economic Impact Assessment which forms part of the planning application, it is stated that the proposal would: (1) create a range of 3,521- 3,704 jobs by 2019/2020 in the South West Region, including direct, indirect, and induced jobs generated by the airport, its construction, and direct, indirect, and induced jobs generated through tourism. Of these, between 900 and 1000 jobs would be at the airport and around 1900 would be related to inbound tourism; and (2) in terms of annual income, it would bring a range of £194.6 - £213.8 millions in 2019/2020 to the region.
- An assessment of the physical arrangement of the modifications, expansions and provision of new facilities at the airport site as set out in the application to determine if these are optimal and appropriate for the scale of air traffic throughput proposed;