

Bristol Airport

Extension to Staff Car Park

Planning Statement



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Amec Foster Wheeler Environment
& Infrastructure UK Limited



Report for

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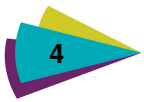
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1. Introduction

1.1 Overview

This Planning Statement is submitted in support of a planning application for an extension to the existing Staff Car Park located to the east of Bristol Airport (the Airport). The application is one of three separate planning applications being submitted by Bristol Airport relating to the development of car parking provision at the Airport, specifically:

- ▶ Proposed Extension to the Staff Car Park (to which this Planning Statement relates);
- ▶ Proposed Extension to the Silver Zone Car Park; and
- ▶ Proposed Multi-Storey Car Park (MSCP).

The Planning Statement sets out the context for the proposed extension to the Staff Car Park (the 'proposed development'), including information on the applicant and descriptions of the development site (the 'application site') and the proposed development, before summarising the relevant Development Plan policies and other material considerations against which the application will be determined. The Planning Statement then assesses the compliance of the proposed development with the relevant policies of the Development Plan and other material considerations, providing reasoned justification for the granting of planning permission.

This Planning Statement has been prepared by Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) on behalf of Bristol Airport.

1.2 Statutory Requirements

Determining Planning Applications

The proposed extension to the Staff Car Park at Bristol Airport will be determined under section 70(2) of the Town and Country Planning Act 1990. The determining authority in this case is North Somerset Council (NSC), as the local planning authority (LPA).

Local Planning Authority Pre-Application Discussions

Pre-application discussions with the LPA have been ongoing throughout the preparation of the planning application for the proposed development. A pre-application meeting was held on 17th March 2016 to discuss the proposed development alongside passenger car parking proposals. The pre-application meeting was used to agree the proposed scope of environmental assessments to be undertaken in support of the planning application including in relation to ecology, landscape and visual impact and traffic and transport.

1.3 Planning Application Submissions

The planning application and supporting documentation have been prepared to ensure sufficient information is provided to enable NSC to make an informed decision on the merits of the proposed development at Bristol Airport. The application seeking planning permission for the scheme comprises the following:

- ▶ Planning application forms;
- ▶ Planning application drawings;
- ▶ Planning Statement (this document);

- ▶ Landscape and Visual Impact Assessment (LVIA)¹;
- ▶ Ecological Appraisal²;
- ▶ Arboricultural Appraisal³;
- ▶ Transport Statement (relating to all three planning applications being submitted by Bristol Airport for the development of car parking provision at the Airport)⁴;
- ▶ Drainage Design Note⁵;
- ▶ Desk Study and Ground Investigation Report⁶; and
- ▶ Lighting Specification.

1.4 Structure of this Planning Statement

This Planning Statement is structured as follows:

- ▶ **Section 2** provides details of the applicant and descriptions of the application site and the proposed development;
- ▶ **Section 3** reviews the current planning policy context for the proposed development including relevant Development Plan policies, national planning policy and guidance and other material considerations;
- ▶ **Section 4** assesses the proposed development in terms of its compliance with the Development Plan, national planning policy and guidance and other material considerations;
- ▶ **Section 5** presents the overall conclusions of the Planning Statement in terms of the proposed development's compliance with planning policy and concluding that planning permission for the scheme should be granted.

¹ Johns Associates Ltd (2016) *Bristol Airport Staff Car Park Landscape and Visual Impact Assessment*.

² Johns Associates Limited (2016) *Proposed Staff Car Park Extension at Bristol International Airport: Ecological Appraisal*.

³ Johns Associates Limited (2016) *Bristol Airport Staff Car Park: Arboricultural Appraisal*.

⁴ Amec Foster Wheeler (2016) *Planning Applications for Car Parking at Bristol Airport: Transport Statement*.

⁵ Capita (2015) *Drainage Design Note-Staff Car park Extension, Bristol Airport*.

⁶ Capita (2015) *Bristol Airport - Staff Car Park Extension Desk Study and Ground Investigation Report*.

2. Development Context

2.1 Introduction

This section of the Planning Statement sets out the context for the proposed extension to the Staff Car Park. It provides details relating to the applicant, gives an overview of the application site and its environs and describes the proposed development.

2.2 The Applicant

The planning application in respect of the proposed extension to the Staff Car Park is being submitted on behalf of Bristol Airport as the applicant. Bristol Airport is the UK's ninth largest airport, and the third largest regional airport in England outside of the South East, after Manchester and Birmingham.

2.3 Application Site and its Environs

Bristol Airport is located on the western side of the A38 Bristol to Bridgwater Road, approximately six kilometres (km) from the suburb of Withywood on the south western edge of Bristol. It is situated on a ridge called Broadfield Down and occupies an area of ~200 hectares (ha). The application site is located within the Airport's operational area to the east of the existing Staff Car Park which itself is adjacent to the airport administration building in Northside Road. The application site is centred at Ordnance Survey National Grid Reference ST512653. A site location plan is presented in **Appendix A**.

The application site is an irregular shaped plot measuring 0.7 ha and comprising semi-improved grassland, plantation woodland, an existing boundary hedgerow and small areas of concrete rubble. A salt/grit store is situated in the south western corner of the site.

The application site is bordered along the southern boundary by 3.0 m high airport security fencing with three stranded barb wire atop beyond which is land associated with the airfield. Along the eastern boundary, the site is delineated by a mature, managed native hedge forming part of the A38 boundary treatment. The northern boundary of the site is bordered by tree planting (on elevated ground) forming a backdrop to the entrance roundabout to the Airport. The western boundary of the site is adjacent to the existing Staff Car Park.

Planning History

Whilst the application site is within the Airport's operational area, its permitted development rights were removed as part of planning application ref. 97/1190 to realign the A38 to enable the installation of a CAT 3 Instrument Landing System which was approved and implemented in 2001. There is no further relevant planning history relating specifically to the application site.

Planning permission⁷ was granted in February 2011 for the major expansion of the Airport to handle 10 million passengers per annum (mppa). The expansion proposals included: terminal extension; new walkways, piers and aprons; additional car parking areas including multi storey; new office building; replacement fuel storage depot; and landscape and nature conservation enhancement measures. The application site was within the boundary of the planning application however, there were no proposals relating to this land. The expansion proposals do include the existing Staff Car Park and administration building which are to be demolished to accommodate an extension to the eastern apron with a new administration building constructed just to the north west of the terminal. It remains the Airport's intention to implement the eastern apron extension in the long term at which point car parking at this location (including that associated with the proposed development) would cease.

⁷ Application number 09/P/1020/OT2.

2.4 The Proposed Development

The proposed development comprises an extension of 196 parking spaces to the existing Staff Car Park which is adjacent to the airport administration building. The proposed development includes for the surfacing of the parking bays to be in crushed stone / hoggins (South Cerney or similar), with the vehicle circulation/drive through area to be surfaced in a macadam product. This allows for a sustainable drainage (SuDS) compliant scheme, with drainage from the macadam areas into the parking bays. Infiltration trenches would be 1.5 m deep. A total of 17no 6 m lighting columns with LED lantern would be installed.

Along the southern boundary of the application site is a proposed 7.4 m wide landscape buffer consisting of a 3.0 m wide security strip adjacent to the security fence set to grassland, and an adjacent 4.4 m wide woodland buffer strip with planting consisting of a native hedgerow and hedgerow trees. The proposals include for the replacement of the existing security fencing with new green coloured, narrow gauge (358 or similar) weldmesh security fencing.

The raised bunded area of woodland immediately south of the Airport entrance roundabout would be retained as existing, with the retained woodland extending approximately 10.0 m into the site. A woodland buffer of approximately 10.0 m width is also proposed to extend along the eastern boundary, to the west of the existing managed native hedgerow boundary along the A38.

Access to and from the application site during operation and construction would be from the existing staff car parking area to the west via North Side Road which leads on to the A38.

The proposed scheme is illustrated in the site layout plan contained at **Appendix B**.

As highlighted in **Section 2.3**, it remains the Airport's intention to implement the eastern apron extension in the longer term and at which point car parking at this location would cease.

3. Planning Policies and Other Material Considerations

3.1 Introduction

This section of the Planning Statement sets out the main Development Plan and national planning policies against which the proposed extension to the Staff Car Park will be assessed. Other material considerations that are also of relevance to the proposed development are set out.

3.2 The Development Plan

Section 70(2) of the Town and Country Planning Act 1990 requires local planning authorities in determining planning applications to have regard to the development plan, so far as material to the applications, and to any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan for the proposed development currently comprises:

- ▶ North Somerset Core Strategy (adopted 2012); and
- ▶ North Somerset Replacement Local Plan (adopted 2007) – saved policies.

The majority of policies that comprise the North Somerset Replacement Local Plan are due to be superseded by the Sites and Policies Plan Part 1: Development Management Policies (hereafter referred to as the Sites and Policies Plan Part 1). The Examination in Public concerning this plan has recently been concluded and NSC received the Inspector's final report on 26th April 2016. The report concludes that, with the inclusion of the recommended main modifications, the plan can be found sound. The plan, including the modifications, is due to be taken to full council on 19th July 2016 for adoption.

In consequence, it is expected that the Sites and Policies Plan Part 1 will form part of the formal Development Plan at the time of the planning application's determination and accordingly the policies contained therein have been afforded appropriate and full weight in this Planning Statement. This accords with guidance⁸ prepared by NSC relating to the application of local planning policy which advises that the Core Strategy should be referred to in the first instance, followed by the Sites and Policies Plan Part 1. Replacement Local Plan policies can be used, but where the Replacement Local Plan is shown to be out of date, and there are no other relevant policies in either the Core Strategy or Sites and Policies Part 1 documents, the National Planning Policy Framework (NPPF) will take precedence.

For the purpose of this Planning Statement, the key Development Plan policies (including those contained in the Sites and Policies Plan Part 1) relating to the proposal and land subject of the application are outlined below.

North Somerset Core Strategy

The North Somerset Core Strategy was adopted in April 2012 and sets out the long-term vision, objectives and strategic planning policies for North Somerset up to 2026.

The Core Strategy contains a suite of spatial visions that are intended to provide a clear, strategic planning context underpinned by a set of priority objectives. With specific regard to the Airport, the overarching vision for North Somerset (Vision 1) sets out that: *"The future planning of...Bristol Airport will be guided by the need to balance the advantages of economic growth with the need to control the impacts on those who live nearby and on the natural environment."* Priority Objective 3, meanwhile, supports and promotes major employers

⁸ See <http://www.n-somerset.gov.uk/wp-content/uploads/2015/11/Current-North-Somerset-planning-policy-framework-July-2015-pdf.pdf> [Accessed May 2016].

in North Somerset including Bristol Airport to ensure continued employment security and economic prosperity.

Policy CS23 is the principal Core Strategy policy relating to development at Bristol Airport and aims to support the delivery of Priority Objective 3. It states:

“Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure.”

The Core Strategy does not contain specific policy relating to airport car parking or the provision of car parking in existing developments. Policy CS11, however, concerns parking provision in new developments and states that *“Adequate parking must be provided and managed to meet the needs of anticipated users (residents, workers and visitors) in usable spaces. Overall parking provision must ensure a balance between good urban design, highway safety, residential amenity and promoting town centre attractiveness and vitality.”*

The application site is located within the defined Green Belt. Policy CS6⁹ sets out that amendments to the Green Belt at the Airport will only be considered once long-term development needs have been identified and exceptional circumstances demonstrated.

The Core Strategy contains a number of other policies of relevance to the proposed development and these are set out in **Table 3.1**.

Table 3.1 Core Strategy Policies Relevant to the Proposed Development

Core Strategy Policy	Summary
CS1: Addressing climate change and carbon reduction	The policy states that NSC is committed to reducing carbon emissions and tackling climate change, mitigating further impacts and supporting adaptation to its effects.
CS2: Delivering sustainable design and construction	The policy states that new development should demonstrate a commitment to sustainable design and construction.
CS3: Environmental impacts and flood risk management	The policy states that development that, on its own or cumulatively, would result in air, water or other environmental pollution or harm to amenity, health or safety will only be permitted if the potential adverse effects would be mitigated to an acceptable level by other control regimes, or by measures included in the proposals, by the imposition of planning conditions or through a planning obligation.
CS4: Nature conservation	<p>The policy states that the biodiversity of North Somerset will be maintained and enhanced by, inter alia:</p> <ul style="list-style-type: none"> • seeking to ensure that new development is designed to maximise benefits to biodiversity, incorporating, safeguarding and enhancing natural habitats and features and adding to them where possible; • seeking to protect, connect and enhance important habitats, particularly designated sites, ancient woodlands and veteran trees; • promoting the enhancement of existing, and provision of new, green infrastructure of value to wildlife; and • promoting native tree planting and well targeted woodland creation, and encouraging retention of trees, with a view to enhancing biodiversity. <p>The policy sets out that a net loss of biodiversity interest should be avoided, and a net gain achieved where possible.</p>
CS5: Landscape and the historic environment	The policy states that the character, distinctiveness, diversity and quality of North Somerset's landscape and townscape will be protected and enhanced by the careful, sensitive management and design of development. Close regard will be paid to the character of National Character Areas in North Somerset and particularly that of landscape types and landscape character areas identified in the North Somerset Landscape Character Assessment. The Mendip Hills Area of Outstanding Natural Beauty (AONB) will be protected by ensuring that development proposals conserve and enhance its natural beauty and respect its character, taking into account the economic and social well-being of the area.

⁹ Following legal challenge to the adoption of the Core Strategy, Policy CS13 was found to be unlawful and associated policy including Policy CS6 was remitted. However, the related Judgement states that this policy can still be accorded appropriate weight in any decision making.

Core Strategy Policy	Summary
	The Council will conserve the historic environment having regard to the significance of heritage assets.
CS9: Green infrastructure	The policy states that the existing network of green infrastructure will be safeguarded, improved and enhanced by further provision.
CS10: Transportation and movement	<p>The policy states that development proposals that encourage an improved and integrated transport network and allow for a wide choice of modes of transport as a means of access to jobs, homes, services and facilities will be encouraged and supported. It states that transport schemes should:</p> <ul style="list-style-type: none"> • enhance the facilities for pedestrians, including those with reduced mobility, and other users such as cyclists; • deliver better local bus, rail and rapid transit services in partnership with operators; • develop innovative and adaptable approaches to public transport in the rural areas of the district; • improve road and personal safety and environmental conditions; • reduce the adverse environmental impacts of transport and contribute towards carbon reduction; • mitigate against increased traffic congestion; • improve connectivity within and between major towns both within and beyond North Somerset; and • support the movement of freight by rail.

Site and Policies Plan Part 1: Development Management Policies

The Sites and Policies Plan Part 1 brings forward the detailed development management policies which complement the strategic context set out in the Core Strategy.

Policy DM50 relates specifically to Bristol Airport (although focusing on development within the Green Belt inset) and aims to ensure that, if further development of the Airport is required, proposals demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure. It states:

“Development within the Green Belt inset at Lulsgate as shown on the Proposals Map will be permitted provided that:

- ▶ *it is required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods;*
- ▶ *environmental impacts such as emissions are minimised, and there is no unacceptable noise impact;*
- ▶ *it is suitably sited, designed and landscaped so as not to harm the surrounding landscape; and*
- ▶ *appropriate provision is made for surface access to the airport, including highway improvements and/or traffic management schemes to mitigate the adverse impact of airport traffic on local communities, together with improvements to public transport services.*

Airport-related development will not be regarded as inappropriate in the Green Belt if the sole reason that planning permission is expressly required is that an environmental impact assessment is required.”

The supporting text to Policy DM50 states that outside the inset, Green Belt policy applies and that it would be for the developer to demonstrate ‘very special circumstances’ that outweigh the harm to the Green Belt and any other harm. Policy DM12 concerns development within the Green Belt and sets out that inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in ‘very special circumstances’.

The Sites and Policies Plan Part 1 does not contain specific policy relating to the development of on-site airport car parking with Policy DM30 concerning off-site airport-related car parking outside the Green Belt only.

The Sites and Policies Plan Part 1 contains a number of other policies of relevance to the proposed development. These policies are listed in **Table 3.2**.

Table 3.2 Sites and Policies Plan Part 1 Policies Relevant to the Proposed Development

Development Management Policy	Summary
DM1: Flooding and drainage	<p>The policy states that all development must consider its vulnerability to flooding, taking account of all sources of flood risk and the impacts of climate change, up to 60 years ahead on non-residential sites. All development that would increase the rate of discharge of surface water from a site must consider its implications for the wider area, including revised or amended proposals.</p> <p>Open areas within developments must be designed to optimise drainage and reduce run-off, while protecting groundwater and surface water resources and quality.</p>
DM3: Conservation areas	<p>The policy states that development within or that would affect the setting of conservation areas will be expected to preserve and, where appropriate, enhance the contribution to the special character of the areas.</p>
DM4: Listed buildings	<p>The policy states that development will be expected to preserve, and where appropriate enhance, the character, appearance and special interest of listed buildings.</p>
DM5: Historic parks and gardens	<p>The policy states that registered and unregistered historic parks and gardens are expected to be preserved by development proposals. Where significant development will have an impact upon the fabric or setting, applicants will have to assess the historic landscape.</p>
DM6: Archaeology	<p>The policy states that archaeological heritage assets should be fully taken into account. Archaeological remains should be preserved in situ where possible. Where it is not necessary to preserve remains in situ, provision should be made for the excavation and recording of assets and the Council will condition development proposals appropriately to achieve this.</p>
DM7: Non-designated heritage assets	<p>The policy states that, when considering proposals involving non-designated heritage assets, the Council will take into account their local significance and whether they warrant protection.</p>
DM8: Nature conservation	<p>The policy states (amongst other requirements) that development proposals must take account of their impact on local biodiversity and identify appropriate mitigation measures to safeguard or enhance attributes of ecological importance. Where appropriate, proposals should seek to conserve the local natural environment by:</p> <ul style="list-style-type: none"> • retaining, protecting, enhancing and linking existing wildlife habitats; • by incorporating retained habitats sensitively into the development through appropriate design; and • by ensuring that such retained and enhanced habitats are managed appropriately. <p>Where necessary, longer term management will be achieved through suitable planning conditions.</p>
DM9: Trees	<p>The policy states that development proposals affecting trees should (inter-alia):</p> <ul style="list-style-type: none"> • demonstrate that the retention, protection and enhancement of tree canopy cover has been considered throughout the design and development process; • evaluate, at a level of detail appropriate to the proposal, the short and longer-term impacts that the development may have on existing trees; • achieve high quality design by demonstrating that the long term retention of appropriate trees is realistic, and that the trees are viewed as an asset by new occupants rather than as an issue of conflict; • provide high quality physical protection of retained trees, which includes working methods that will be clearly communicated and understood by all site staff; and • include, where practical, the introduction of appropriate new tree planting and woodland creation as an integral part of the design and landscaping of new developments, using native species of local origin wherever possible.
DM10: Landscape	<p>The policy states that all development proposals should:</p> <ul style="list-style-type: none"> • not have an unacceptable adverse impact on the designated landscape character of the district as defined in the Landscape Character Assessment Supplementary Planning Document (2005) and respond to the distinctive qualities of the landscape including both nationally registered and unregistered historic parks and gardens; • be carefully integrated into the natural, built and historic environment, aiming to establish a strong sense of place, respond to local character, and reflect the identity of local surroundings, whilst minimising landscape impact; • respect the tranquillity of an area;

Development Management Policy	Summary
	<ul style="list-style-type: none"> include appropriate landscaping and boundary treatments in the scheme; conserve and enhance natural or semi-natural vegetation characteristic of the area; respect the character of the historic landscape including features such as field patterns, watercourses, drainage ditches, stone walls and hedgerows; and where outdoor lighting is proposed, adopt a lighting scheme which minimises obtrusive light. <p>Where some harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, the policy states that positive mitigation measures should be secured by a landscape condition or planning agreement (Section 106), involving works on or off-site as necessary.</p>
DM11: Mendip Hills Area of Outstanding Natural Beauty (AONB)	The policy states that any development will need to conserve and, where possible, enhance the landscape and scenic natural beauty of the AONB.
DM19: Green Infrastructure	The policy states that green infrastructure should be provided in line with the phasing and scale of development.
DM24: Safety, traffic and provision of infrastructure, etc. associated with development	<p>The policy states that development will be permitted provided it would not prejudice highway safety or inhibit necessary access for emergency, public transport, service or waste collection vehicles. Development giving rise to a significant number of travel movements will only be refused on transport grounds if it:</p> <ul style="list-style-type: none"> is likely to have a severe residual cumulative impact on traffic congestion or on the character and function of the surrounding area; or is not accessible by non-car modes or cannot readily be integrated with public transport, cycleway and footpath links, and bridleways where appropriate. <p>Development which gives rise to a significant detrimental impact on travel patterns, or exacerbates existing transport problems, will only be permitted where acceptable counter measures or mitigation is possible.</p>
DM26: Travel plans	The policy states that travel plans will be required for all developments which generate significant amounts of movement including development comprising or involving a significant increase in existing car parking provision.
DM31: Air safety	The policy states that planning permission will not be granted for development that would prejudice the safe operation of Bristol Airport or other safeguarded aerodromes. Within the Public Safety Zones, long-stay and employee car parking will be permitted.
DM32: High quality design and place-making	The policy states that the design of new development should contribute to the creation of high quality, distinctive, functional and sustainable places where opportunities for physical activity and recreation are maximised. The design and planning of development proposals should demonstrate sensitivity to the local character, and the setting, and enhance the area taking into consideration the existing context. Design solutions should seek to enhance local distinctiveness and contribute to the creation of a sense of place and identity.

North Somerset Replacement Local Plan

The Replacement Local Plan was adopted by NSC in March 2007. Several policies are relevant to the proposed development including, in particular, Policy T12 (Bristol International Airport) and Policy RD/3 (Development in the Green Belt), in addition to policies concerning, inter-alia, cultural heritage, landscape and biodiversity. However, as these policies largely reflect, and are due to be superseded by, those contained in the Site and Policies Plan Part 1, they are not summarised here. This is in accordance with the Council's guidance⁸.

3.3 National Planning Policy Framework

The National Planning Policy Framework (NPPF) (2012) sets out the Government's planning policies and is a material consideration in determining planning applications. Paragraph 14 sets out that a presumption in favour of sustainable development is key to decision taking, which should be taken to mean:

- ▶ *“approving development proposals that accord with the development plan without delay; and*
- ▶ *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

- ▶ *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- ▶ *specific policies in this Framework indicate development should be restricted.”*

The following extracts from the NPPF are considered to be particularly relevant to the proposed extension to the Staff Car Park.

Section 1: Building a strong, competitive economy establishes the Government’s commitment to securing economic growth stating at paragraph 19 that *“Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”* Paragraph 21 also sets out that *“investment in business should not be over-burdened by the combined requirements of planning policy expectations and that planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.”*

Section 4: Promoting sustainable transport refers specifically to airport related development. At paragraph 33 it states that *“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs.”*

With regard to transport more generally, the NPPF seeks to make the fullest possible use of public transport, walking and cycling. At paragraph 32, it sets out that *“All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- ▶ *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- ▶ *safe and suitable access to the site can be achieved for all people; and*
- ▶ *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*

Paragraph 35 outlines that developments should be located and designed where practical to, inter alia;

- ▶ accommodate the efficient delivery of goods and supplies;
- ▶ give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- ▶ consider the needs of people with disabilities by all modes of transport.

Paragraph 36 advises that a key tool to facilitate the above will be a travel plan.

Section 9: Protecting Green Belt land sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF identifies five purposes of including land in Green Belts:

- ▶ to check the unrestricted sprawl of large built-up areas;
- ▶ to prevent neighbouring towns merging into one another;
- ▶ to assist in safeguarding the countryside from encroachment;
- ▶ to preserve the setting and special character of historic towns; and
- ▶ to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF stipulates that substantial weight should be given to any harm to the Green Belt and that inappropriate development should not be approved except in ‘very special circumstances’. Paragraph 88 states that ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Paragraphs 89 and 90 identify certain forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

The NPPF also includes, inter alia, policies for flood risk and conserving and enhancing natural and historic environments and which are supported by Planning Practice Guidance. These policies and guidance are also relevant to the proposed development.

3.4 Other Material Considerations

Aviation Policy Framework

The Aviation Policy Framework (APF) was published in March 2013 and sets out the Government's policy to allow the aviation sector to continue to make a significant contribution to economic growth across the country. The APF supports the growth of regional airports whilst managing associated environmental impacts and in this context, it recognises the vital role Bristol Airport plays in the economic success of the South West region.

Section 5 (Planning) sets out that all proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts.

West of England Joint Spatial Plan

The four local planning authorities of Bristol City Council, Bath and North East Somerset Council, NSC and South Gloucestershire Council are currently preparing a new Joint Spatial Plan (JSP) for the West of England (WoE) sub-region. Once adopted, the JSP will set out the high level spatial strategy for housing, employment and transport across the WoE including the general extent of the Green Belt. The plan will cover the period 2016 – 2036.

As part of the preparation of the JSP, consultation on Issues and Options was undertaken between November 2015 and January 2016. The Issues and Options consultation document set out (inter-alia) the proposed vision and spatial objectives for the JSP and indicative strategic locations for future growth identifying Bristol Airport as a strategic employment location.

West of England Joint Local Transport Plan 3 2011 - 2026

The latest iteration of the Joint Local Transport Plan (JLTP) aims to deliver an affordable, low carbon, accessible, integrated, efficient and reliable transport network to achieve a more competitive economy and better connected, more active and healthy communities. In this context, the JLTP seeks to achieve improved access to Bristol Airport by public transport including through the delivery of the South Bristol Link.

The WoE's four local authorities are currently preparing a Joint Transport Study that will supersede the JLTP, providing clear direction for the long-term development of the transport system in the WoE to 2036 and beyond.

West of England Strategic Economic Plan 2015-2030

The WoE Strategic Economic Plan (SEP) contains a vision for economic growth which is managed sustainably to ensure all those within the area benefit and that the environment is protected and enhanced. The SEP recognises the key strategic role of Bristol Airport in the sub-regional economy and as a lever for growth.

Supplementary Planning Documents

NSC has adopted a number of Supplementary Planning Documents (SPD) of potential relevance to the proposed development. These SPD include:

- ▶ Biodiversity and Trees (December 2005);
- ▶ North Somerset Landscape Character Assessment (December 2005);
- ▶ Travel Plans (November 2010); and
- ▶ Creating Sustainable Buildings and Places in North Somerset (March 2015).

Airport Surface Access Strategy 2012-2016

Bristol Airport has implemented an Airport Surface Access Strategy (ASAS) to address its planning obligations relating to surface access. The Strategy has the following aims and objectives:

- ▶ to secure easy, reliable and efficient access to Bristol Airport for passengers and staff;
- ▶ to increase the use of public transport by passengers consistent with a target of 15% of passengers using public transport at 10mppa;
- ▶ to improve access to Bristol Airport for passengers travelling to and from the West of England, the South West of England and South Wales;
- ▶ to reduce congestion and the carbon and air quality impacts of traffic travelling to and from Bristol Airport;
- ▶ to facilitate access to jobs for local communities through the implementation of the Staff Travel Plan; and
- ▶ to ensure that the surface access arrangements contribute to the growth of Bristol Airport and enable it to deliver its full potential in delivering air services to the local catchment supporting economic growth.

Staff Travel Plans 2009 - 2016

Bristol Airport operates a number of initiatives aimed at reducing staff reliance on the car for their journeys to work. A formal Staff Travel Plan was first implemented in 2006 to promote and encourage alternative means of travel to and from the Airport and reduce single occupancy car journeys by staff. The Travel Plan was comprehensively reviewed and updated in conjunction with the planning application for the expansion of the Airport, and has since been updated with staff travel surveys undertaken in 2012, 2014 and 2015, and the production of the revised Staff Travel Plan 2016.

Together, the ASAS and Travel Plans have generated a reduction in single occupancy vehicles (SOV) by:

- ▶ management measures including the appointment of a Staff Travel Plan co-ordinator and the operation of a Staff Travel Plan Steering Group and Travel to Work Forum, Air Transport Forum and Public Transport Steering Group;
- ▶ measures to encourage car sharing including the introduction of a Car Sharing Scheme;
- ▶ measures to encourage public transport use including improvements to the Airport Flyer Express bus service;
- ▶ measures to reduce the need to travel including flexible working practices;
- ▶ parking management including the implementation of a Staff Car Park Management Plan; and
- ▶ promotion of walking and cycling including a Ride2Work scheme and improved cyclist facilities.

The 2016 Staff Travel Plan contains the following objectives:

1. To reduce the impact of the Airport's existing travel demands and to assist in the mitigation of the traffic impact associated with the Airport's development.
2. To facilitate access to appropriate travel information for employees.

3. To increase employee and passenger awareness of, and access to, sustainable modes of travel.
4. To reduce unnecessary or unsustainable use of the car for journeys to and from the site.
5. To provide an on-going management co-ordination process which will monitor and review changes towards achieving modal shift.
6. To improve access so that Bristol Airport can recruit and retain the staff that help make the Airport a success.

4. Planning Assessment

4.1 Introduction

Based on the review of the Development Plan, national planning policy and other material considerations presented in **Section 3** of this Planning Statement, a number of topics/issues have been identified that are considered to represent the key planning considerations relevant to the determination of the planning application for the proposed extension to the Staff Car Park. These topics are as follows:

- ▶ Development within the Green Belt;
- ▶ Traffic and Transport;
- ▶ Landscape and Visual;
- ▶ Heritage (including archaeology);
- ▶ Ecology;
- ▶ Water, Air and Noise Pollution;
- ▶ Flood Risk.

The following sub-sections assess the proposed development against each of the topics listed above in-turn, drawing on information prepared in support of the planning application where appropriate. **Section 4.9** then considers the principle of the proposed development in the context of the principal Development Plan policy concerning development at the Airport.

4.2 Development within the Green Belt

The application site is located within the Green Belt as defined in the Development Plan (**Appendix C** shows the extent of the Green Belt in the vicinity of the Airport including the inset). Section 9 of the NPPF (Protecting Green Belt land) sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF, extant Development Plan policy and development management policies contained in the Sites and Policies Plan Part 1 establish that inappropriate development is by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. Paragraph 88 of the NPPF sets out that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The 'very special circumstances' which exist and justify the proposed extension to the Staff Car Park within the Green Belt are considered to include:

- ▶ limited impact on the openness of the Green Belt;
- ▶ increased demand for staff car parking;
- ▶ lack of suitable alternative sites; and
- ▶ policy support for development at the Airport.

These 'very special circumstances' are considered in-turn below.

Limited Impact on the Openness of the Green Belt

The NPPF identifies five purposes of including land in Green Belts:

- ▶ to check the unrestricted sprawl of large built-up areas;
- ▶ to prevent neighbouring towns merging into one another;

- ▶ to assist in safeguarding the countryside from encroachment;
- ▶ to preserve the setting and special character of historic towns; and
- ▶ to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is considered that the application site does not perform any of the five purposes of including land within the Green Belt set out in the NPPF, as demonstrated in **Table 4.1**. It follows, therefore, that the proposed development would not compromise any of the five purposes of the Green Belt.

Table 4.1 Assessment of the Application Site against the Five Purposes of the Green Belt

Purpose	Meets the Purpose?
To check the unrestricted sprawl of large built-up areas.	No. The A38 forms a natural boundary to the landscape influence of the Airport, and forms a physical boundary to restrict any sprawl beyond this.
To prevent neighbouring towns merging into one another.	No. Given the presence of the Airport and A38, the application site does not perform this Green Belt function.
To assist in safeguarding the countryside from encroachment.	No. Given the presence of the Airport and A38, the application site does not perform this Green Belt function.
To preserve the setting and special character of historic towns.	No. Given the presence of the Airport and A38, the application site does not perform this Green Belt function.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	No. There are no suitable alternative brownfield/non-Green Belt sites within and in close proximity to the Airport.

The proposed extension to the Staff Car Park would introduce built development and cars within the Green Belt. However, the affected area would be very small (the application site measures 0.7 ha). Further, as there are already some existing views through the site to airport buildings, lighting and car parking, the change to the character of the site as part of the Green Belt would be minor with any adverse effects mitigated by landscaping measures. In this regard, the Landscape and Visual Impact Assessment (LVIA) prepared in support of the planning application concludes that the proposed development would not materially harm the openness of the Green Belt (see also **Section 4.4**). It is also important to note that the proposed development would be utilised only until such time that the administration building is demolished and in consequence, any impact on the openness of the Green Belt would be temporary and reversible.

Increased Demand for Staff Car Parking

The Airport is a key regional economic driver and strategic employment location. Its growth has resulted in an increase in businesses and staff working at the Airport either directly or indirectly. As at 2015, there were 52 businesses on the site supporting 2,818 full time equivalent employees. The implementation of the existing expansion proposals, including the extended terminal facilities and hotel development, has also increased the number of contractors working at the site with approximately 250 contractors currently requiring car parking. Additionally, as a key regional economic hub, the Airport is receiving an increasing number of visitors and in the 12 month period May 2015 to April 2016, a total of 13,760 visitors utilised the Staff Car Park which is equivalent to an average of 38 visitors per day. Whilst the growth of the Airport is clearly of substantial benefit to the regional economy, it has increased demand of on-site staff car parking provision.

Staff, contractors and visitors currently park in the main staff car park adjacent to the administration building which has 682 parking spaces of which 80 are for taxis/car rental. Small numbers of staff car parking spaces for key operational staff are available at the Air Traffic Control Tower and near the terminal building. Additionally, 400 spaces have been allocated in the Silver Zone Car Park for staff who do not need to be based immediately next to the administration building. The number of spaces provided needs to allow for shift changeovers, when staff reporting for duty and those finishing work are present and require parking space provision. Shift changeovers are staggered to reduce the number of spaces needed to accommodate

this 'doubling up', but in the summer peak the demand for staff car parking exceeds the number of spaces available.

Together, the increase in staff employed at the Airport, visitors and contractors has resulted in a shortage of staff car parking space, especially during the peak summer period. This has led to the use of passenger car parking by staff and contractors, creating traffic conflict and a reduction in the number of spaces available for passengers. This situation exists despite Bristol Airport's implementation of a Surface Access Strategy and strong commitment to successive Staff Travel Plans which have significantly increased public transport use by staff (see **Section 4.3** for further information). In consequence, there is an urgent need to address the current undersupply of staff car parking at the Airport.

Through the provision of additional staff car parking, the proposed development would help to meet demand. This in-turn would reduce the overspill of staff vehicles into customer car parks, maximising the availability of spaces for passenger parking.

Lack of Suitable Alternative Sites

There is no land available for staff car parking within the Green Belt inset to the north of the runway nor are there non-Green Belt sites in close proximity to the Airport (see **Appendix C**). In consequence, no suitable alternative sites outside the Green Belt are available.

Locating staff car parking in the Green Belt but away from the boundary of the Airport would be inappropriate from an operational perspective, increase vehicle movements, and would result in greater harm to the Green Belt in terms of its openness than the application site (which benefits from forming part of the operational area of the Airport and does not fulfil the five purposes of the Green Belt). As a result, there are not considered to be any more suitable alternative sites within the Green Belt and outwith the Airport's operational boundary.

The existing (consented) proposals for the Airport's expansion include the provision of staff car parking within a dedicated area of the Silver Zone Car Park (approximately 1,000 spaces). The Silver Zone Car Park lies within the Green Belt and was identified as the most suitable location for car parking following a robust and comprehensive assessment of car parking options that comprised a Car Park Solutions Study¹⁰ submitted in support of the application for the Airport's expansion. As set out above, it remains Bristol Airport's intention to implement this element of the extant consent at the point when the existing administration building and Staff Car Park are demolished to facilitate the extension to the eastern apron. However, until such time that the eastern apron is extended, it is considered sensible and appropriate for staff car parking to remain adjacent to the existing administrative building as this will ensure ease of access for staff, contractors and visitors to the building as well as to the terminal and development sites. In this context, the proposed development would form a logical extension to the existing Staff Car Park. Further, by rationalising the current allocation of car park spaces, reducing the dispersion of spaces around the airfield and locating more staff, contractor and visitor parking closer to the administration building and the terminal, the proposed development would reduce worker trips during the day.

Overall, the application site is considered to be the only suitable site for staff car parking provision at this time.

Policy Support for Development at the Airport

More than 3,300 people were employed at Bristol Airport in 2015 (equivalent to 2,818 full time employees). An economic impact assessment (carried out by ERS) found the total direct, indirect and induced value of the Airport's operations equates to around 4,200 jobs. Visitors using the Airport generate spending of £347m in the local economy and, in total, the Airport generates £388m of Gross Value Added. In a survey by Business West (Local Business Survey Q4 2014), just under one in five local businesses cited Bristol Airport as an important factor in their choice of location.

¹⁰ Entec UK Limited (2009) *Car Parking Solutions Study - Update Report 2009*.

Recognising the important role that the Airport plays in the economic success of the South West region, the APF, emerging WoE Joint Spatial Plan and the Development Plan support growth and development at the Airport, provided environmental impacts are controlled. More broadly, the NPPF (at paragraph 19) makes clear that significant weight should be placed on the need to support economic growth and investment in businesses.

As set out above, the proposed development would provide car parking to staff employed at the Airport as well as for contractors and visitors. This would support the continued role of the Airport as a major employer in the regional economy and the implementation of the existing expansion proposals. Sections 4.3 to 4.8 of this Planning Statement clearly demonstrate that the proposed development would not result in significant adverse environmental effects. In consequence, the proposed development accords with the wider policy support for development at the Airport.

Conclusion

A number of 'very special circumstances' exist and which justify the proposed extension to the Staff Car Park. These 'very special circumstances' are:

- ▶ limited impact on the openness of the Green Belt;
- ▶ increased demand for staff car parking;
- ▶ lack of suitable alternative sites; and
- ▶ policy support for development at the Airport.

Paragraph 88 of the NPPF sets out that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. It is submitted that the 'very special circumstances' set out above outweigh any potential harm to the Green Belt in this case.

4.3 Traffic and Transport

The NPPF and Development Plan policy including Policy DM24 of the Sites and Policies Plan Part 1 promote sustainable transport modes and seek to avoid adverse impacts on the highways network. Policy DM26 of the Sites and Policies Plan Part 1, meanwhile, requires that travel plans be prepared for all developments which generate significant amounts of movement including development comprising or involving a significant increase in existing car parking provision.

As set out in **Section 4.2**, the increase in staff employed at the Airport, contractors and visitors has resulted in a shortage of staff car parking space, especially during the peak summer period. This situation exists despite the implementation of a Surface Access Strategy (ASAS) 2012-2016 and Bristol Airport's strong commitment to successive Staff Travel Plans which together have achieved a significant reduction in single car occupancy (SOV) from 93.0% in 2004 to 74.6% in 2015 (meeting the target set out in the Staff Travel Plan 2009 – 2016 to reduce SOV to 75% of airport staff by 2015) and increased the proportion of staff utilising more sustainable modes of transport, as highlighted in **Table 4.2**. This has been achieved through:

- ▶ management measures including the appointment of a Staff Travel Plan co-ordinator and the operation of a Staff Travel Plan Steering Group and Travel to Work Forum, Air Transport Forum and Public Transport Steering Group;
- ▶ measures to encourage car sharing including the introduction of a Car Sharing Scheme;
- ▶ measures to encourage public transport use including improvements to the Airport Flyer Express bus service;
- ▶ measures to reduce the need to travel including flexible working practices;
- ▶ parking management including the implementation of a Staff Car Park Management Plan; and
- ▶ promotion of walking and cycling including a Ride2Work scheme and improved cyclist facilities.

Table 4.2 Employee Mode Shares and 2020 Targets

Mode	2004	2007	2009	2012	2014	2015*	2020 Target
Car on own	93%	86.4%	86.6%	80.5%	82%	74.6%	69%
Car share	4%	4.2%	5.2%	6%	9%	4.6%	8%
Bus	2.5%	5.5%	6.0%	10%	4%	16.3%	20%
Powered two wheeler		2.8%	1.4%	2.5%	2%	1.3%	1%
Cycle	0.6%	0.7%	0.4%	1%	2%	1%	1%
Other		0.4%	0.3%		0%	0.7%	1%

Note- * survey response at 302 responses from 2,835 employees, was less than 25%. Therefore other means to determine the modal shares were considered to help verify the 2015 survey figures. This was based on the 62,000 return Flyer tickets sold to staff, which equates to 14.3%. 2% of trips were by other bus travel so therefore it would appear that bus travel overall is around 16.3%. As non-car modes are very low the table has been amended to assume the difference (27.7- 16.3 = 11.4) would mainly be in increased SOV journeys.

Notwithstanding this, many staff do not have access to sustainable transport options, either because of where they live, or because of the shift patterns that they work which may make public transport less attractive, or car share unviable.

The Transport Assessment prepared in support of the 2009 application for the expansion of the Airport considered a number of scenarios for the Airport growth up to 10 mppa and which incorporated a core assumption that there would be proportional growth in staff numbers related to the increase in passenger numbers. This assumed that staff parking would be dispersed, and with an allocation of spaces in the Silver Zone Car Park

The 2009 Transport Assessment modelled two scenarios of traffic generated by the Airport in the peak AM and PM hours at 10 mppa:

- ▶ a worst case scenario with no achievement of modal share targets (staff and passengers) and therefore no modal shift from car use; and
- ▶ a likely scenario at 10 mppa with achievement of targets (15% public transport for passengers and reduction in SOV to 75% for staff).

Mitigation was based on the worst case scenario; this included highway improvement schemes which were constructed in 2015, and significant contributions to public transport improvements, which Bristol Airport has made.

The Transport Statement prepared in support of the planning application for the proposed development calculates staff trips in the peak hours based on a worst case, and unlikely, scenario that the additional spaces result in a proportional increase in traffic generation in the peak hour. In reality, the use of the additional spaces may be more spread out over the course of the day, as they will enable greater flexibility for shift changeovers and for construction staff for example.

Based on the Transport Assessment traffic generation figures for staff at 75% SOV, the Transport Statement estimates that the proposed development would result in a negligible increase in vehicle movements when compared to the worst case scenario traffic generation as a whole, for which mitigation has been implemented. For these reasons, the Transport Statement concludes that the proposed development is acceptable from a traffic /highways perspective. Further, the Transport Statement highlights that by rationalising the current allocation of car park spaces, reducing the dispersion of spaces around the airfield and locating more staff and contractors closer to the administration building and the terminal, the proposed development would reduce staff/contractor trips during the day.

It is also important to note that measures to increase the use of sustainable modes of transport and SOV journeys by staff will continue through Bristol Airport's commitments to its Staff Travel Plan, helping to reduce

car use associated with staff. In this context, the 2016 Staff Travel Plan includes targets to (inter-alia) reduce the modal share of SOV by 6% and increase bus use by 4% by 2020 compared to 2015 modal shares (see **Table 4.2**).

Overall, the proposed development would provide staff car parking to meet existing demand and support the Airport's growth. It would not generate significant, additional vehicle movements. As highlighted in **Section 4.2**, the provision of additional staff car parking spaces would also reduce the overspill of staff vehicles into customer car parks, maximising the availability of spaces for passenger parking. Bristol Airport is also committed to the ongoing implementation of its Staff Travel Plan that will encourage alternative means of travel to and from the Airport and reduce single occupancy car journeys by staff. In consequence, the proposed development accords with Development Plan policy.

4.4 Landscape and Visual

Development Plan policy and the NPPF seek to conserve and enhance landscape including the Mendip Hills AONB. Policy DM10 of the Sites and Policies Plan Part 1 requires (inter-alia) that proposals should not have an unacceptable adverse impact on the designated landscape character of North Somerset as defined in the Landscape Character Assessment SPD.

There are no national (statutory) or local landscape designations that apply to the application site. The landscape character of the site is defined in the Landscape Character Assessment SPD as Landscape Type G: Settled Limestone Plateau and its sub-group Landscape Character Area (LCA) G1: Broadfield Down Settled Limestone Plateau. The majority of the application site is well screened from the traffic approaching the Airport entrance roundabout from the north, as the raised topography of the landscape bund in the north is above eye level and planted with screening mixed woodland approximately 15 years old. The nearest residential property is located east of the Airport entrance roundabout and 155 m from the site. It is screened from the site by intervening vegetation and rising topography. The residential properties of The Round House and Hill House are approximately 505 m and 560 m from the site respectively, to the south west. Although there are glimpsed views of the site from Felton Common immediately north of these residential properties, the presence of a mature hedgerow buffer west of the properties is deemed to effectively screen the properties from the A38 and hence the site. It is considered, therefore, that there are no residential properties with visibility of the application site. Due to its location and size, there are also no significant long/middle distant views of the application site.

As noted in **Section 4.2**, a LVIA has been undertaken in support of the planning application. This assessment has considered the potential landscape effects of the proposed development on those parts of LCA G1 where character is potentially affected by the proposals (hereafter referred to as Local Landscape Character Area (LLCA) Airport Plateau) and on several landscape features. The assessment has also considered the visual effects of the proposed development on a number of receptor groups including users of Public Rights of Way (PRoW), Felton Common and the A38.

The landscape assessment identifies that none of the landscape receptors considered in the assessment would sustain in excess of a 'minor/moderate' magnitude of effect. This principally reflects the fact that there are existing views through the application site to airport buildings, lighting and car parking such that any change to character/features would be low as the addition of the proposed car parking area would not constitute the addition of a new feature completely at odds with the existing character of the area. The proposed development would introduce woodland buffer planting along the site/A38 boundary as well as along the southern boundary together with enhanced hedgerow management. The landscape assessment concludes that this would generate long term beneficial effects on the LLCA and other landscape features including the Green Belt and Forest of Avon by effectively screening views of the majority of the car parking area and allowing for a greater degree of visual screening of the existing airport infrastructure beyond.

The visibility of the application site is very localised and from public viewpoints restricted. In this context, the visual assessment concludes that the proposed development would not have a major effect on any of the receptor groups considered. The assessment identifies a negligible long-term impact for long-distance viewpoints and a neutral-beneficial effect on the view for near viewpoints. The receptor groups most affected would be motorists along the A38 within 20m of the application site. However, in the long term there would be beneficial effects associated with improved visual screening.

Overall, the proposed development would have minor landscape and visual effects and in the longer term, landscape management measures including planting would generate beneficial effects including in respect of the LLCA. In consequence, the proposed development is considered to accord with Development Plan policy, Policy DM10 of the Sites and Policies Plan Part 1 and national planning policy in respect of landscape and visual impact.

4.5 Heritage (including archaeology)

The Development Plan, Sites and Policies Plan Part 1 and the NPPF seek to conserve and enhance the historic environment, having regard to the significance of heritage assets including non-designated features.

There are no designated cultural heritage assets within the boundary of the application site. The nearest designated asset is Windmill House Grade II Listed Building which is over 500 m to the south east of the site and to the east of which is Oval barrow on Felton Hill 100 m east of The Round House Scheduled Monument (approximately 60 m from the application site).

The proposed development would not have any direct effects upon the cultural heritage assets of the surrounding area. Due to the nature and scale of the proposed development, the location of the application site (which is surrounded to the east by the busy A38 and on all other sides by the existing infrastructure of the Airport) and taking into account the measures proposed to screen the development (as set out in **Section 4.4**), there would be no adverse effects on the setting of cultural heritage assets.

As the proposed development would not have any direct effects on cultural heritage assets or indirect effects on their settings, the scheme is considered to be in conformity with the key heritage policies of the Development Plan, Sites and Policies Plan Part 1 and the NPPF.

4.6 Ecology

National and local planning policy seek to conserve and enhance biodiversity. Relevant local policies include Core Strategy Policy CS4 and Sites and Policies Plan Part 1 policies DM8 and DM9 in addition to guidance contained in the Biodiversity and Trees SPD (December 2005). Policy CS9 of the Core Strategy and Policy DM19 of the Sites and Policies Plan Part 1 also seek to safeguard and enhance green infrastructure in new developments whilst Policy DM9 concerns the protection and enhancement of trees.

The application site is not affected by any statutory or non-statutory designated nature conservation sites. The North Somerset and Mendip Bats Special Area of Conservation (SAC) is 4.5 km west of the application site boundary whilst Felton Common Local Nature Reserve (LNR) is 170 m east. There are no other statutory designated sites (including Sites of Special Scientific Interest (SSSI), National Nature Reserves or LNRs) within 1 km of the application site boundary. Oatfield Wood is located 900 m north north-west of the application site and is designated as a Sites of Nature Conservation Interest (SNCI). Based on the nature of the proposals and distance from the SAC and LNR, no significant adverse impacts are expected to occur on statutory or non-statutory sites.

An Ecological Appraisal (including an Extended Phase 1 Habitat Survey and Reptile Survey) has been undertaken and accompanies the planning application. The Ecological Appraisal has considered impacts on habitat and protected and priority species. The Appraisal concludes that the majority of predicted habitat losses would largely comprise only common and widespread habitats. Species-rich hedgerow (located just outside the application site boundary) would be retained and protected during construction. Semi-improved grassland represents a more ecologically rich habitat (although only of limited value) and losses of this habitat would be compensated through translocation of turfs and/or seed bank soil elsewhere within the Airport.

The Ecological Appraisal highlights that habitats within the application site offer some potential for protected and priority species including amphibians, foraging bats, foraging badgers, common reptiles and invertebrates and nesting birds. However, the Appraisal concludes that the majority of impacts to these species can be avoided or mitigated by:

- ▶ timing of vegetation clearance, prior checks and/or working methods to avoid impacts to species, if present;
- ▶ protection of the retained off-site hedgerow and woodland habitat, during the construction period; and
- ▶ delivery of an ecological tool-box talk to all site contractors, prior to works commencing.

The Ecological Appraisal identifies a range of potential enhancement measures (see **Box 1**) that would be implemented by Bristol Airport

Box 1: Proposed Biodiversity Enhancement Measures

- Installation of bird nest boxes on retained trees in suitable locations within the application site or within the wider local area.
- Enhancement of selected areas within the application site such as along the green corridor adjacent to the A38, the retained hedgerow and retained plantation woodland, such as by use of appropriate management and installation of log piles to provide additional habitat for invertebrates and to increase the number of prey species for species such as amphibians, reptiles, bats and birds.
- Appropriate management of the habitats present across the application site following construction to maximise their biodiversity value for the operational life of the proposed development.
- Use of native species of local provenance in all planting proposals.
- Protection of newly planted areas/ trees.
- Placement of any suitable cut woody material and earth/ stone in suitable locations to form hibernacula/ resting places for fauna such as amphibians, reptiles and invertebrates.
- Appropriate management of existing and newly created habitats within the application site.

To support the planning application, an Arboricultural Appraisal has been undertaken and confirms that whilst some trees and shrubs would be removed, much of the existing plantation woodland in the site would be retained along with the species rich mature hedgerow along the A38. Further, no construction works would occur within the root protection area for individual trees and tree protection fencing would be used to protect the retained trees and replacement planting and new hedgerow would be provided through the landscaping proposals. The Appraisal includes an Arboricultural Method Statement which sets out the key aspects of the management and protection issues that will be implemented to ensure successful tree retention.

With appropriate mitigation, the construction and operation of the proposed development is predicted to have no likely significant effects on either the habitats or species present in the area or trees on site. In consequence, the proposal is compliant with Development Plan policy. In accordance with national and local planning policies as well as the Biodiversity and Trees SPD, the proposed development includes a range of enhancement measures that would generate positive ecological effects.

4.7 Ground, Water, Air and Noise Pollution

Core Strategy Policy CS3 stipulates that development that, on its own or cumulatively, would result in air, water or other environmental pollution or harm to amenity, health or safety will only be permitted if the potential adverse effects would be mitigated to an acceptable level. Policy DM1 of the Sites and Policies Plan Part 1 stipulates that open areas within developments must be designed to optimise drainage and reduce run-off, while protecting groundwater and surface water resources and quality. The NPPF (Section 11), meanwhile, seeks to prevent development from contributing to unacceptable levels of soil, air, water or noise pollution or land instability.

The Desk Study and Ground Investigation Report prepared in support of the planning application identifies that the application site is on a Principal Aquifer (Black Rock Limestone) and is located in an area between an inner and outer zone 2 Source Protection Zone. There are no surface water features within 1 km of the site. Discharge consents exist for the disposal to soakaway of surface water from the Airport. There are no historic or current sources of land contamination identified on the application site.

The proposed development would not result in any significant effects in relation to water, soil or land quality. Any slight variations in topography including shallow depressions or raised mounds would be reprofiled to accommodate the new car park surfacing. Any arisings would be re-used elsewhere on site or dealt with in

an alternative appropriate manner. During construction, best practice measures would be followed to ensure appropriate mitigation of any potential contamination to groundwater and ground conditions. During operation, no significant risk to the quality of the aquifer is predicted as best practice measures would be implemented so that any potential leaks from vehicles are contained. SuDS would be included in the design of the car park that enable sustainable and clean drainage of surface water.

Background air quality is considered to be good; no Air Quality Management Areas (AQMA) have been designated in the local area. No exceedances of air quality management objectives have been predicted (based on modelling results) from the Airport's current activities, taking into account background local air quality. The background noise is dominated by aircraft and traffic noise from the A38.

The construction phase of the proposed development would generate increased levels of noise and emissions to air from plant operation and HGV movements. However, effects would be temporary, over a short duration and localised. Any site noise or emissions to air during construction would be mitigated through good working practice and management, and selection of plant and equipment. Given the relatively small increase in vehicle numbers associated with the operation of the scheme (see **Section 4.3**), the absence of sensitive receptors adjacent to the site and the background noise, the operation of the proposed development would not give rise to any significant noise or air quality effects.

The proposed development would not result in unacceptable levels of environmental pollution or harm to human health. In consequence, the scheme is considered to be compliant with Policy CS3 and the NPPF.

Policy DM31 of the Site and Policies Plan Part 1 is concerned with the safe operation of the Airport, specifically by restricting development within Public Safety Zones. However, exception is made for long-stay and employee car parking (where the minimum stay is expected to be in excess of six hours). The proposal therefore also complies with Policy DM31.

4.8 Flood Risk

The Development Plan and the NPPF seek to avoid inappropriate development in areas of flood risk and ensure that development does not increase flood risk elsewhere. Policy CS1 of the Core Strategy also seeks to support adaptation to the effects of climate change whilst Policy DM1 of the Sites and Policies Plan Part 1 stipulates that open areas within developments must be designed to optimise drainage and reduce run-off.

The application site and wider Airport is situated in Flood Zone 1 (low risk) and there are no watercourses in the vicinity of the site. In consequence, fluvial flood risk is negligible. As noted in **Section 4.7**, SuDS would be included in the design of the car park. The system to be employed has already been agreed with the Environment Agency for use in the northside and southside car parks and generally consists of impermeable drive aisles with permeable parking bays that discharge direct to ground. Infiltration trenches have been designed to increase infiltration and storage volume by connecting the permeable parking bays to the underlying bedrock.

Overall, the proposed development is compliant with the Development Plan, NPPF and Policy DM1 of the Sites and Policies Plan Part 1.

4.9 Summary: Principle of the Proposed Development

Policy CS23 of the Core Strategy is the principal Development Plan policy relating to the proposed extension to the Staff Car Park (Policy DM50 of the Sites and Policies Plan Part 1 and Policy T/12 of the Replacement Local Plan principally concern development within the Green Belt inset and off-airport car parking). It states that *"Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure."*

As development that relates to the operation of the Airport and which is intended to provide adequate parking for staff, contractors and visitors, the principle of the proposed extension to the Staff Car Park is considered to be supported by Development Plan policy. Further, sections 4.2 to 4.8 above demonstrate,



with reference to environmental assessments undertaken in support of the planning application, that the proposed development would not result in any significant adverse environmental impacts and that 'very special circumstances' exist to justify development in the Green Belt.

5. Conclusion

This Planning Statement has identified the Development Plan policy, national planning policy and other material considerations relevant to the proposed extension to the Staff Car Park located to the east of Bristol Airport and adjacent to the airport administration building. The proposed car park is required to address a shortage of staff car parking spaces associated with an increase in staff working at the Airport, contractors related to the implementation of the Airport's expansion proposals and visitors. The provision of additional staff car parking spaces would also reduce the overspill of staff vehicles into customer car parks, maximising the availability of spaces for passenger parking.

The APF, emerging WoE Joint Spatial Plan and the Development Plan support growth and development at the Airport, provided that environmental impacts are controlled. The NPPF also makes clear that significant weight should be placed on the need to support economic growth. In this context, Policy CS23 of the Core Strategy requires proposals for the development of Bristol Airport to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure. This is the principal Development Plan policy relating to the proposed development.

By increasing car parking capacity, the proposed development would support the continued role of the Airport as a major employer in the regional economy and the implementation of the existing expansion proposals. As demonstrated in **Section 4** of this Planning Statement (and with reference to the environmental assessments undertaken in support of the planning application), any adverse environmental effects associated with the construction and operation of the proposed development would be minor and acceptable. This reflects the nature and scale of the development, its location within the Airport's operational boundary between the existing Staff Car Park and the A38 and the design of the development which has been afforded careful consideration to ensure that adverse impacts are minimised and beneficial effects realised. In consequence, the proposed development accords with Policy CS23.

The application site is located within the Green Belt and in this regard a number of 'very special circumstances' have been identified which justify the proposed extension to the Staff Car Park. These 'very special circumstances' are:

- ▶ limited impact on the openness of the Green Belt;
- ▶ increased demand for staff car parking;
- ▶ lack of suitable alternative sites; and
- ▶ policy support for development at the Airport.

Paragraph 88 of the NPPF sets out that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. It is submitted that the 'very special circumstances' set out above outweigh any potential harm to the Green Belt in this case.

In conclusion, the scheme, through detailed review, is shown to be compliant with the adopted Development Plan, national planning policy and other material considerations. In-line with the presumption in favour of sustainable development advanced in the NPPF, it is respectfully submitted that the proposed extension to the Staff Car Park at Bristol Airport be granted planning consent.