

Mike Cole
Principal Planning Officer
Development Management Development and
Environment North Somerset Council
Post Point 15
Town Hall
Weston-super-Mare
BS23 1UJ

4 September 2018

British Air Line Pilots' Association
BALPA House
5 Heathrow Boulevard
278 Bath Road
West Drayton
UB7 0DQ

Tel: +44 (0) 20 8476 4000
Fax: +44 (0) 20 8476 4077
Email: balpa@balpa.org

www.balpa.org



Dear Mr Cole

18/P/4007/FUL | Application to vary condition no.3 attached to planning permission 16/P/1486/F (development of car parking with associated temporary lighting, fencing and landscaping on agricultural land, providing approximately 3,650 long stay car parking spaces for use in peak months May-October and forming an extension to the existing Silver Zone Car Park) to allow year-round use of car park for a temporary period of one year.

The British Airline Pilots' Association (BALPA) and UNITE represent the interests of pilots and cabin crew working at Bristol Airport.

BALPA and UNITE submit the following comments in relation the above application.

1. The airport does not appear to have properly explored all the options available to maintain maximum parking capacity over the winter, if they were to do so there may be a diminished or even no requirement for temporary year-round use of the seasonal car park (Cogloop sections C1 and C2).
2. In October/November, co-incident with the application to allow temporary year-round use of the seasonal car park, the airport intends moving all staff who currently park in the north-side staff car park (682 spaces) to a car park on the south-side of the airport, that is currently part of the Silver Zone. Due to road layout redesign and change from valet public parking to conventional staff parking, the planned movement of staff to the new car park will cause a reduction in Silver Zone capacity amounting to an estimated 1040

spaces, contributing to the shortage of parking capacity that has generated the perceived requirement for the application 18/P/4007/FUL.

3. Every new south-side staff car parking space will remove 1.4 public Silver Zone parking spaces due to 'block parking' arrangements where public cars are valet-parked bumper to bumper, whereas staff cars will obviously need to be conventionally parked. The result will be a loss of an estimated 810 public parking spaces in the Silver Zone. In order to facilitate the additional south-side staff parking, a new road layout is proposed, this will cause the further loss of an estimated 230 public spaces. Shortage of Silver Zone parking contributes to unauthorised off-site parking provided by third party companies. The resulting loss of 1040 spaces can only encourage this undesirable practice.
4. In their June 2016 Transport Statement, the airport declared a total parking capacity of 12,959 spaces. Adding the 3,650 silver-zone seasonal spaces produces a total of 16,609. In spring 2018 the first 3 floors of the multi storey car park (MSCP) were built – capacity 1162 according to the current application. Circa 400 existing spaces may have been lost to the MSCP footprint but a net increase of approximately 750 making a current total capacity of 17,359, would have been expected. However, in the current application the airport have declared 'a total of 16,336 passenger car parking spaces', a discrepancy of 1,023 spaces. In the current application the airport has stated that 5,341 spaces will be displaced during February 2019. In the 2016 Transport Statement the entire north side car parking provision was declared at 4,609 (not including the north side staff car park), if the estimated net increase of 750 MSCP spaces are added, this brings the total current north side provision to 5,359. Can the airport explain the 'loss' of circa 1023 spaces and is the airport seriously suggesting that in February there will only be possibly 18 car parking spaces available north side? It would appear that the airport should re-examine and explain their figures as their claim of 5,341 lost spaces is unconvincing, undermining the basis for the application.
5. In the application, the airport have stated at 4.2.4 that there is an 'increased demand for low cost car parking'. By completing road re-alignment works and choosing to move staff to the south-side in the winter of 2018/19 rather finding alternative space north-side, the airport has taken a conscious decision to reduce lower cost parking capacity by an estimated 1040 spaces, and airport net capacity by some 480 spaces during the winter and thereafter. In parallel the airport has declared a projected shortage of capacity due to building works, but at the same time requested permission to vary a planning condition in order to add 3,650 low cost spaces for the winter 2018/19. Consideration does not seem to have been given to reducing this temporary shortage by delaying the move of staff to the south-side of the airfield. By doing so it is estimated that the airport would avoid the loss of 1040 low cost spaces and 480 net capacity.

6. Considering significant environmental impact, it is difficult to understand how approval of 18/P/4007/FUL, can be in accordance with policies CS6 of the Core Strategy and DM12 of the Sites and Policies Plan as cited at condition 4 of the 16/P/1486/F decision notice, or CS10, DM24, DM26 and DM30. It is questionable whether the special circumstances required for green belt development are satisfied when the airport does not appear to be taking all available steps to minimise the need for such development.
7. In the light of the unforeseen increase in demand for low cost parking since outline planning permission was granted it would seem sensible to completely review the decision to move staff to the south-side of the airfield. Transport statements published to date do not appear to address the increase in traffic that will be generated by this decision.
8. Airline crew should be should be able to park near to their place of work, an aim accepted by the airport in their 2016 application to extend the current north-side staff car park, where ease of access and reduction of worker trips during the day were cited as reasons for locating staff parking close to the place of work. Crew rest periods are strictly regulated, remote parking south-side will require a bus thus increasing commute times and reducing rest periods with a detrimental effect on flight safety and operational efficiency. Air traffic control staff rest periods are also strictly regulated - Bristol ATC staff currently park immediately adjacent to the control tower.
9. In the 2016 application to extend the staff car park (16/P/1440/F) the airport argued that additional (south-side) capacity was required to address a shortage of staff car parking spaces.

"...a shortage of staff car parking spaces, especially during the summer period 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."

The conclusion stated:

"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 allocation of additional Silver Zone land to staff parking spaces will cause a disproportionate reduction in spaces available for passengers – in direct contradiction to the arguments made above in 2016.

10. Through the construction of the multi storey car park, the airport is in the process of significantly increasing parking capacity on the north-side of the airfield. Since the commissioning of the first phase of the multi storey car park (capacity 1162) in May this year utilisation has been poor, possibly because the multi storey was the most expensive long stay offering. During June and July, the average number of free spaces available were 460 and 540 respectively (sample taken daily around midday). During August there has been less free space owing to a promotion heavily discounting multi storey car park prices to a price point sometimes below that of 'long stay' which is usually the cheapest north-side offering. For example, a quote on Sunday August 12th for 7 days commencing August 25th offered £90.99 in long stay and £83.99 in the multi storey car park. It is understood that the airport plans to add an additional two storeys this winter increasing capacity to 1878 spaces. Planning approval exists for further multi storey expansion, bringing the total capacity to 3850, and it is understood that this additional capacity will be commissioned during 2019/20. With the current consultation for expansion beyond 10m passengers per year including still further multi storey capacity, substantially more car parking will be available north-side, at a price point likely to be more acceptable to airlines for example, if the successful August pricing is indicative of the sustainable charging level.
11. In short, the airport appears to be engaged in a forlorn attempt to maximise profits by retaining all north-side car parking spaces for premium passenger public car parking even though the June - August experience would suggest that the market will not support the premium pricing initially hoped for. Consequently, when allowing for the cost in terms of lost spaces when turning valet parking into staff parking, there is unlikely to be any significant monetary difference between north-side and south-side staff parking. This strategy is at the expense of significant transport impacts in terms of the increased risk of off-site illegal passenger parking because there will be less low-cost parking available, and safety implications for all staff that will have reduced rest periods because of the increased travel time to and from the proposed south-side car park.

The airport's application for year-round use of the seasonal section of the Silver Zone car park is partly related to the puzzling policy of expanding staff parking into the existing Silver Zone area. This policy is clearly flawed with the impact being:

- a. An increase in worker trips past the airport as the majority of aircrew live north of the airport (the A38 will become increasingly busy simply because of this);
- b. A negative environmental impact caused by an increase in the use of diesel buses moving staff around the airport (the requirement will exist for a 5-10 minute bus frequency 24/7);



- c. A further negative environmental impact caused by a likely increase in off-site parking due to long term reduction in low cost passenger parking in the Silver Zone;
- d. A likely and significant loss of revenue to 'unofficial' off-site parking third-party operators (potentially causing job losses);
- e. A negative operational impact due to remote parking of aircrew (higher chance of aircraft leaving late etc).

Given the significant transport impacts and safety implications we would request a meeting with yourself to fully discuss the matter.

Provided that the airport satisfactorily answers the points raised in sections 1-6 above, BALPA and UNITE recommend that NSC insists on the following condition if deciding to approve the application:

The airport demonstrates that all available measures to maintain a maximum amount of existing capacity have been taken, including the allocation of spaces in the north-side long stay car park sufficient for all operational and other staff who currently park north-side,

In the light of sections 7-11 BALPA and UNITE also recommend that the airport reviews the entire strategy of south-side parking for operational staff, or indeed all staff whose place of work is or will be north side.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "JRK", with a large, stylized flourish underneath.

John Stembridge-King MBE
Head of Organisation
BALPA

A handwritten signature in dark ink, appearing to read "C Shortman", written in a cursive style.

Clinton Shortman
Convenor and Branch Chair
UNITE