

DELEGATED REPORT

Application No:	18/P/4007/FUL	Target date:	09.11.2018
Case officer:	Neil Underhay	Extended date:	
Proposal:	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.		
Site address:	Land At Bristol Airport, North Side Road, Felton,		

SUMMARY OF MAIN ISSUES AND RECOMMENDATION

Background

Bristol Airport Limited (BAL) received outline planning permission (reference number 09/P/1020/OT2) in February 2011 for the expansion of Bristol Airport to handle 10 million passengers per annum (mppa). The permission comprised over 30 different elements including a seasonal car park on land known as ‘Cogloop’, which would form an extension to the ‘Silver Zone Car Park’. Condition 9 of planning permission 09/P/1020/OT2, only allowed the car park to be used between May and October each year.

In November 2016, full planning permission (reference number 16/P/1486/F) was granted for the same seasonal car park, albeit this permission allowed the car park to be constructed in one complete phase, meaning it would be available earlier than the two-phase construction in the 2011 permission. This arose due to changing demands for car parking at the airport. Planning permission 16/P/1486/F Silver was implemented in 2017. Condition 3 of planning permission 16/P/1486/F only allows the car park to be used between May and October each year.

The ‘Cogloop’ Car Park

The application site (the ‘Cogloop’ seasonal car park) lies to the south of the runway. It is bounded by the existing radar site and further Silver Zone car parking areas to the east, and the airport’s fire training ground and snow base to the north. To the south and west of

the site are agricultural fields. The site is approximately 7.8 ha in area and it comprises 3,650 long stay car parking spaces surfaced by a grid structure with grassed parking bays divided by asphalt aisles and access roads. To the south and west boundaries of the site is a 3m high perimeter security fence and a 2m high landscape bund with planting atop. The site also includes associated features such as signage, temporary (seasonal) lighting, CCTV and services. Vehicles access the site via the A38 roundabout and report to the Silver Zone reception where cars are then valet parked. There is no public access to the application site. A 24-hour bus service transfers passengers to and from the pick-up / drop off zone outside the terminal building.

Proposal

BAL say (paragraph 4.2.9 of their planning statement): *“Construction activity associated with the continued implementation of the 10 mppa consent and ongoing operational development over the 2018/19 winter period will result in the displacement of car parking spaces across the airport site. They add (para 4.2.10 of planning statement): “the temporary loss of car parking capacity will mean that the demand for car parking will significantly outstrip supply, particularly during periods of peak demand over the Christmas and Easter holiday periods. At peak (April 2019), there would be a shortfall of circa 3,044 spaces whilst during the Christmas period, there would be a shortfall of 2,935 spaces. In consequence, without alternative car parking provision during the winter 2018/19 period, there would be insufficient car parking capacity at the airport to meet passenger demand.”*

To ensure sufficient passenger car parking remains available, BAL wish to vary Condition 3 planning permission 16/P/1486/F to allow use of the seasonal car park from 1st November 2018 to 30th April 2019.

In parallel with this, BAL has sought an Environmental Impact Assessment (EIA) Screening Opinion for the proposal. This was subject to a separate application reference number 18/P/4017/EA1. The assessment of this application concluded that the proposal did not constitute ‘EIA’ development.

Policy Framework

North Somerset Core Strategy (NSCS) (adopted January 2017)

The following policies are particularly relevant to this proposal:

Policy Ref	Policy heading
CS1	Addressing climate change and carbon reduction
CS2	Delivering sustainable design and construction
CS3	Environmental impacts and flood risk management
CS4	Nature Conservation
CS5	Landscape and the historic environment
CS6	North Somerset’s Green Belt
CS11	Parking
CS23	Bristol Airport

Development Management Policies (adopted July 2016)

The following policies are particularly relevant to this proposal:

Policy	Policy heading
DM1	Flooding and drainage
DM2	Renewable and low carbon energy
DM6	Archaeology
DM8	Nature Conservation
DM9	Trees
DM10	Landscape
DM11	Mendip Hills Area of Outstanding Natural Beauty
DM12	Development within the Green Belt
DM29	Car parks
DM50	Bristol Airport

Other material policy guidance

National Planning Policy Framework (NPPF) (July 2018)

The following is particularly relevant to this proposal:

Section No	Section heading
13	Protecting Green Belt Land
14	Meeting the challenge of climate change, flooding and coastal change
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment

Supplementary Planning Documents (SPD) and Development Plan Documents (DPD)

- North Somerset Landscape Character Assessment SPD (adopted December 2005)
- Biodiversity and Trees SPD (adopted December 2005)
- North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: SPD (Adopted January 2018)

Consultation summary

Copies of representations received can be viewed on the council's website. This report contains summaries only.

Wrington Parish Council

The Council is disappointed to receive this application so soon after the granting of a temporary consent for use of this land to 'overspill' car parking pursuant to application 16/P/1486/F, and objects strongly.

The special circumstances put forward to support this application would appear to have been the result of Bristol Airport's failure to complete its obligations under previous planning permissions to meet car parking demands by building of appropriate multi-storey facilities in good time and a misjudgement of the car parking requirements sufficient to meet proposed expansion of air traffic.

The Planning Statement accompanying the application makes play of the potential that any delay would cause to "essential development" and that "projected growth and the associated economic benefits this brings would not be fully realised." (section 4.2.14) and

goes on to refer (in section 4.2.16) to “allowing the year-round use of the Silver Zone Seasonal Car Park would support the on-going implementation of the extant consent.....allow BAL to respond effectively to the ongoing operational needs of the airport by investing in airport infrastructure.” Please note the word ‘temporary’ is not included in this statement and the statement seeks unsuccessfully to make attempts to justify the reasons for this further application.

Section 4.2.17 states that “temporary year-round use of the site would therefore be consistent with national aviation policy which seeks to make the best of existing airport capacity and infrastructure.” but the cogloop land temporary use was conditioned as it is not part of the existing airport capacity.

In the event that NSC is minded to approve this temporary extension to the car parking facilities, which was permitted until 31 October 2017 (condition 3 of 16/P/1486/F) then this Council would expect that at the end of October 2019 at the latest, no further extensions to be permitted and the timeline to be rigidly enforced, together with a re-instatement of the land use.

Parish Council’s Airport Association (PCAA)

The PCAA are very concerned that this application reflects the inadequacies of car parking at Bristol Airport due firstly to multi-storey car parks not being constructed in line with the planning consent of 09/P/1020/0T2. Secondly a failure by North Somerset Council to recognise and insist on an adequate number of car parking spaces required for growth up to 10 mppa at the time of granting planning consent.

The PCAA cannot object to this application as the consequences of the lack of car parking on site will be more off-site parking with potentially more parking within parishes close to Bristol Airport directly impacting on residents.

Bristol Airport expects the level of car parking spaces across the site, due to other development activity, to be reduced by 39-42% which equates to approximately 5,341 spaces. There is a very real potential that demand for car parking will significantly outstrip supply, particularly at Christmas and Easter even with the use of the Silver Zone Seasonal Car Park (Cogloop Land) which has a total of 3,650 car parking spaces. As stated above this will have a knock-on impact on parishes, one which may be immense.

The PCAA believe that it is only fair and reasonable that the following conditions are placed on this application to ensure that the promised car parking spaces within the multi-storeys are constructed:

1. The second phase of the new multi-storey is constructed before any further construction activity takes place such as on the first phase of the Far Eastern Apron and Car Rental Consolidation Centre. This will add an additional 716 spaces to the multi storey block giving a total of 1878. (Reference Planning Statement section 2.5.1 and 4.2.21).
2. The planning consent of 2011 stated that by approximately this time there would be 3,850 car parking spaces plus a transport interchange. Currently there is a deficit of multi storey car parking spaces of 2688 which will be reduced to 1972 if phase 1b goes ahead as planned (outlined above). Thus, again, before any further construction takes place, a further MSCP including a transport interchange should be constructed at the same time as MSCP phase 1b with at least 1972 spaces to

honour obligations under the planning consent. This has been referred to in section 4.2.21 of the Planning Statement.

3. That NSC makes it clear to Bristol Airport that no future application to release the land for car parking will be considered if the airport fails to deliver the MSCP spaces previously agreed.
4. The mobile lighting units with a height of 6m should be reduced to prevent light spill, particularly in the winter months when leaf fall has taken place. This will protect residents close by in Winters Lane from the visual effect of increased lighting in the dark evenings and winter nights and generally reduce the level of lighting associated with sky glow. It will also protect vistas from the Mendip Hills.

British Air Line Pilots' Association (BALPA) and UNITE

Objects to the application on the following grounds (as summarised by officers):

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 this 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. The airport should stagger the various building projects over a longer period as this would reduce the quantity of car parking this is temporarily removed, and this would reduce the need for over winter use of the seasonal car park.
3. One of the key factors which exacerbates the loss of car parking capacity is the decision to relocate staff car parking (BAL and Air Line staff) from the north side of the airport to the south side of the airport. This is estimated to result in a net reduction in car parking of circa 1040 spaces. This arises because the road alterations to form the new staff car park and its layout, which requires defined parking bays and aisles, takes up much more land than the bumper-to-bumper valet block parking that it will replace.
4. The estimated loss of 1040 parking spaces comprises low-cost parking spaces, and it is this type of parking that BAL has argued is its highest demand product. Such loss appears counter-intuitive in the short and longer term and it may an increased likelihood of unauthorised off-site parking, given that the lower-cost parking demand will remain high.
5. In light of point 4, 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.
6. 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.

7. The airport plans to add an additional two storeys to the north side multi-storey car park 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 substantially more car parking being available north-side in the near future, BAL should explore options for affordable parking options for airline staff nearer to their direct workplace.

Overall, it is not considered that BAL has demonstrated 'very special circumstances' which support the over-winter use of the car park in the Green Belt. Furthermore, the effect of reduced low-cost customer parking and displaced airline staff parking will increase trip distances causing negative environmental impacts.

Bristol Airport Parking Communities Group (BAPCoG)

Objects on the following grounds (summarised)

1. This proposal will staff who currently park in the north-side staff car park (682 spaces) to park on the south-side of the airport. Each staff space will remove 1.4 public Silver Zone parking spaces due to the arrangement where passenger cars are parked bumper-to-bumper, whereas staff cars obviously need to be parked to allow access. The result will be a loss of an estimated 810 passenger parking spaces in the Silver Zone. Other associated development will cause the further loss of an estimated 230 public spaces. *This new staff car park will cause a reduction in Silver Zone capacity amounting to an estimated 1040 spaces, itself contributing to the shortage of parking capacity that is the basis for this application.*

2. In the application, that airport claim that 'there is an increased demand for low-cost car parking' (4.2.4). Yet by completing road re-alignment works and choosing to move staff to the south-side in the winter of 2018/19 rather than 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.

3. Now the Airport has declared a projected shortage of capacity due to building works. 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.*

4. Compounding an already weak case, the Airport sums do not add up: The Airport Transport Statement (June 2016) declared a total parking capacity of 12,959 spaces. With the 3,650 silver-zone seasonal spaces this makes a total of 16,609 parking spaces. In spring 2018 the first 3 floors of the multi storey car park (MSCP) were built with a capacity 1162 (according to the current application). Allowing 400 existing spaces lost to the MSCP footprint, the MSCP provides a net increase of 762 spaces, making a current total capacity of 17,371. *However, in the current application the airport has declared 'a total of 16,336'. This is a discrepancy of 1,035 spaces.* Moreover, the 2016 Transport Statement indicates the north side car parking provision to be 4,609 (not including the north side staff car park). Yet the current application states that 5,341 spaces will be displaced during February 2019. *The Airport's misrepresentation of the 'lost spaces' completely undermines the basis for the application.*

5. In the light of the apparently 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.

6. Through the construction of the multi storey car park (MSCP), the airport is significantly increasing parking capacity on the north-side of the airfield. Recent analysis shows that 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 offer. 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.

7. In short, the airport appears to be engaged in an 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. 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.

8. This strategy is likely to drive passengers in the arms of illegal passenger parking because there will be less low-cost parking available. Further negative impact arises from an increase in traffic on the A38 with employee trips past the airport (as the majority of aircrew and other employees live north of the airport), and 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).

9. If the Airport were to make a proper assessment of all the options available to maintain maximum parking capacity over the winter it may well find that there is no requirement for temporary year-round use of the seasonal car park (Cogloop sections C1 and C2). As is

often the case, the Airport is relying on assertion rather than evidence as a tool for incremental expansion.

10. 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. The special circumstances required for green belt development cannot be satisfied when the airport does not appear to be taking all available steps to minimise the need for such development.

11. In sum the application for permission to vary a planning condition appears to be simply a device for incremental expansion where temporary changes of planning permission provide the basis for permanent change. The motive here is maximising income options, regardless of the social and environment consequences. BAPCoG requests that North Somerset Council reject this application.

National Planning Casework Unit (NPCU)

They were notified of the application under the requirements of the 'The Town and Country Planning (Consultation) (England) Direction 2009' – paragraphs 4 (a) and (b). The NPCU confirmed that they do not want to 'call-in' the application. This means that the decision can be taken by the Council.

Key Planning Issues

Green Belt

The 'Cogloop' seasonal car park is in Green Belt. In granting the 2016 permission, the Council was satisfied that the applicant had demonstrated 'very special circumstances' for the car park to be delivered as a single-phase development and the proposal outweighed any harm to the openness of the Green Belt and any other harm. The need for the car park was however only justified during seasonal peak demands (May to October each year). Hence, a planning condition of the 2016 permission says that it cannot be used outside this period. This limits the impact of the car park on the openness of the Green Belt.

As this proposal now seeks use outside the current seasonal limits (from November 2018 to April 2019), the Council must again decide whether: (1) 'very special circumstances' have been proven for this use; and, (2) whether these very special circumstances clearly outweigh harm to the openness of the Green Belt or any other harm. This approach accords with paragraph 144 of the NPPF and Policy DM12 (*'Development within the Green Belt'*) of the Sites and Policies Plan.

BAL, in their Planning Statement, sets out what they consider to be 'very special circumstances' in support for the proposal. These are:

- A need for temporary replacement car parking from November 2018 to April 2019
- Inability to provide temporary replacement parking in the Green Belt Inset
- Negligible impact on the openness of the Green Belt
- Policy support for development at Bristol Airport

These points are amplified below with the officers' comments in italics.

Need for Replacement car parking

BAL say there is currently 16,336 car parking spaces at Bristol Airport (BA). From this, the Cogloop Seasonal Car Park provides 3,650 spaces for between May and October each year. Outside of this period, car parking capacity decreases to 12,686 spaces. BAL say *the number of spaces displaced over the [2018-2019] winter period will vary*. They initially suggested car parking capacity will be reduced by circa 39% [which would equate to 4948 spaces temporarily lost] increasing to around 42% [equating to 5,341 spaces temporarily lost] during February 2019. However, they have subsequently said the optimum loss would be 4042 spaces. They account for this change as the 'Eastern Apron development' should not be included in the forecast on the basis that the loss of staff car parking spaces in this location represents a permanent as opposed to temporary loss of spaces.

In para 4.2.10 of their planning statement BAL say: *"the temporary loss of car parking capacity will mean that the demand for car parking will significantly outstrip supply, particularly during periods of peak demand over the Christmas and Easter holiday periods."* They contend without alternative car parking provision during the winter 2018/19 period, there would be a significant under-supply of car parking capacity at the airport to meet the projected demands.

Some objectors contend BAL has over-estimated the number of car parking spaces that will be temporarily removed. Furthermore, construction works should be staggered over a longer period so that the peak loss is less significant. It is also contended that there are inconsistencies in the actual quantity of current parking spaces and BAL has consciously reduced 'Silver Zone' parking capacity by replacing high-density block parking with staff parking and other recent and planned development.

It is suggested the amount of temporary car parking that is required is substantially less than proposed. Moreover, BAL have flexibility to avoid or substantially reduce the quantum of replacement parking that is required during the 2018-2019 winter period, thereby reducing the adverse impact of the proposal on the openness of the Green Belt. Some objectors acknowledge however that without temporary mitigation at the airport, the demand might revert to further off-site airport parking in the Green Belt.

Officers response

To temporarily remove up to 4042 parking spaces at the airport during the 2018/2019 winter period would be an exceptionally high loss and it is unrealistic to suppose this loss can be managed without mitigation. BAL has provided a breakdown to show the location and amount of car parking spaces that would be temporarily lost as a result of the various building projects.

Officers asked BAL to explain why it has put itself in this position of carrying out large-scale numerous projects over the 2018-2019 winter period, which accounts for a high loss of car parking. They say the works have been programmed to coincide with an imminent demand for these facilities being reached. This shows that up to six major developments

will be ongoing at different parts of the airport at the same time. The proposed developments are said to be essential for the growth of the business and delaying or staggering these development over a longer period, would not be in the interests of the needs of the business or its customers. They add that carrying out these development in the quieter winter period, will have less overall impact on the business.

While the clustering of these new developments will cause a significant reduction in car parking capacity, it is for BAL to decide when they choose to carry consented or 'permitted' developments. There is nothing to indicate that the applicant has sought replacement parking for any reason other than it is essential mitigation for customers and staff and that the quantity and duration of this temporary use is justified.

Inability to provide temporary replacement parking in the Green Belt Inset

BAL say it is committed to providing an intensive level of development within the Airport's Green Belt inset. Recent development such as the airport hotel, Phase 1a multi-storey car park are testament to that with Phase 1b of the MSCP (a further two level of the car park) due to be completed in 2019. Their master plan for further growth at the airport (development beyond 10 mppa) shows an intention to provide further development in the Green Belt inset, including further multi-storey car parking and other operational buildings. They contend there is no scope to accommodate temporary car parking within the Green Belt inset.

Despite these claims, some objectors say this application is the result of BAL not carrying out sufficient development to date within the Green Belt inset, such as further phases of the MSCP and had they done this, a winter use of the seasonal car park could be avoided or substantially reduced. It is also contended that the Council, when dealing with the planning application for 10 mppa, should have anticipated that there would be a need for more on-site car parking.

Officers Response

Dealing with the last point first, information provided with the 10 mppa application (2011) including the surface access strategy, demonstrated that the amount of additional car parking required at the airport was fully justified. To have allowed more car parking at that time would have been unsubstantiated, particularly in the Green Belt, and this would have not been in the interests of optimising sustainable travel to and from the airport.

The temporary closure of the recently completed multi-storey car park while two more parking levels are added on top, would contribute to a significant temporary reduction in car parking at the airport. Had BAL completed all 5 levels of the MSCP in a single-phase development fewer car parking spaces would be temporarily removed. The Council was however satisfied that the applicants had demonstrated 'very special circumstances' why the multi-storey car park should be constructed in phases - during its consideration of planning applications 16/P/1455/F and 16/P/1486/F respectively in 2016. Even if the Phase 1 MSCP had been delivered in a single phase, this would not avoid the need for replacement parking to be found, given the amount of other car parking that will be temporarily removed over the winter 2018-2019, while several other developments take place.

By expanding the multi-storey car park and carry out consented works in the Green belt inset, BAL is demonstrating an intention to develop the Green Belt Inset in an intensive way. Their emerging Airport Master Plan, which sets out a long-term strategy for further phased growth of the airport, also proposes further development inside the inset including

more multi-storey car parking. There is nothing to suggest this application is proposed at the expense of under-developing or under-using the airports Green Belt inset. Furthermore, there is no other large car parking sites outside the Green Belt that are known to be temporarily available, while offering the same infrastructure and transfer arrangements to the passenger terminal that would result from the winter use of the seasonal car park

Negligible impact on the openness of the Green Belt

BAL say the proposed temporary winter use of the Cogloop car park would operate the same as it does between May to October and no alternations are required to its size, layout or appearance and all perimeter / adjoining vegetation will be retained. They say the car park would not have any greater impact on the openness of the Green Belt.

Officers response

Officers disagree with the latter point because the very nature of parking up to 3650 vehicles on land that is unused (and open) between November to April is bound to adversely affect the openness of that land during these months. This is inappropriate development in the Green Belt, which, by definition, is harmful to the Green Belt. Retaining vegetation around the edge of the site does not change the loss of openness within the site, but it does, for the reasons set out in the 'Landscape Impact' section of this report, reduce its wider landscape and visual impact

Policy support for development at Bristol Airport

BAL say the development Plan and emerging Joint Spatial Plan support growth and development at the airport, provided its environmental impacts are mitigated. The NPPF (paragraph 104) supports investment in transport facilities and paragraph 80 says significant weight should be placed on the need to support economic growth and investment. BAL say the proposal is essential infrastructure to support significant continued investment and economic growth of the airport and that the environmental impacts of the proposal are minor.

Officers Response

The Aviation Policy Framework (APF) 2013 makes it a key priority to make better use of existing runway capacity at all UK airports, while mitigating environmental impacts. 'Beyond the Horizon – the future of UK aviation: next steps towards an aviation strategy ('Next Steps')' April 2018, says the aim of the new aviation strategy is, of relevance, to help the aviation industry work for its customers and support growth while tackling environmental impacts. This is reflected in: 'Beyond the Horizon – the future of UK aviation: making best use of existing runways ('Making Best Use') June 2018.

Policy 4 of the West of England JSP says: "Development in the following key strategic employment locations will ensure the continued economic growth of the West of England. The locations include: 'Bristol Airport'. Policy CS23 of the Core Strategy requires proposals to resolve environmental issues. Green Belt policies apply in addition to airport policy.

The Local Plan 2036 Issues and Options document September 2018 also outlines four options for removing land surrounding the airport perimeter from the Green Belt, three of

which show the land the subject of this application removed from the Green Belt. The fourth shows the airport relationship to the Green Belt unchanged. However, this document is at a very early stage and can thus be accorded only very little weight in this decision.

The principle of airport growth is therefore supported subject to acceptable mitigation of its environmental impacts, but 'very special circumstances' must be demonstrated to justify airport development in the Green Belt.

Other Points relevant to the Green Belt

Some representations say that the Council should, if it supports this application, impose planning conditions that require the second phase of the multi-storey car park and public transport interchange to be constructed before any construction takes place on the eastern apron works and car rental facility: both of which are in the Green Belt. Furthermore, no other Green Belt land should be released for car parking until the multi-storey car park is fully completed and operational.

As previously stated, the 2016 permission does not require the Phase 2 multi-storey car park and its roof top public transport interchange to be constructed by a fixed point or commensurate with other development, such as the eastern apron works or replacement car rental. To condition this for the temporary use of a seasonal car park which does not give rise to an overall increase in car parking capacity at the airport would be inappropriate.

BALPA / UNITE say that replacing Green Belt block parking with staff parking and new buildings, will ultimately result in increased land being needed for car parking in the Green Belt. To reiterate however, the decision to relocate staff parking in to the Green Belt was approved in 2011. The BAL replacement staff building does not require planning permission.

Summary

The use of the seasonal car park between November 2018 and April 2019, would cause harm to the openness of the Green Belt and this is given substantial weight in the planning balance. Against this, sufficient airport parking is essential to its function and the substantial temporary loss of car parking without any mitigation, would be detrimental to BAL and its customers. Temporary replacement car parking is therefore essential and there is no evidence that this could be met outside the Green Belt, such as the airports Green Belt Inset. The quantity of the replacement parking is also justified. If sufficient temporary replacement car parking is not found, there is the potential for car parking to be provided at alternative locations, either as roadside parking near to the airport, or as further unauthorised car parking on the Green Belt, which already occurs. Either potential outcome is not one that is supported by the Council for reasons of its impacts on Green Belt, countryside and nearby communities. Officers consider the applicants case amounts to 'very special circumstances' and that this outweighs its harm to the openness of the Green Belt.

Landscape Impact

Tree, scrub and hedgerow coverage along and near to the application site boundaries, which includes a 2-metre high perimeter bund with planting atop, reduces views of parked

cars from outside the site and outside the airport. Limited exceptions include a partial framed view from a short section of Winters Lane to the west of the car park. The local topography prevents middle-distance views from the south where the Broadfield Down plateau upon which the airport and car park are sited descends to the Yeo Valley. Longer distance views from the more elevated and open parts of the Mendip Hills AONB approx. 3.2km to the south include Bristol Airport, but the seasonal car park cannot be easily distinguished within the context of the airport. Even when leaf cover is reduced, the height and density of the vegetation and the particularly the bund is likely to provide an effective screen of the car park, such that its use between November to April is unlikely to have more than a low landscape / visual impact.

Lighting in the car park might be more perceptible to views from outside the airport during winter months due to leaf drop. The lights are however positioned to minimise light spill beyond the car park and their contribution to wider sky glow is modest. It has been suggested in representations that the height of the lights, which are 6 metres tall, could be reduced to lessen any adverse impact. The applicants have however confirmed that the height of the lights, while portable, are fixed at 6 metres.

The potential for this proposal cause a significant adverse impact on the character and appearance of the localised landscape, including near distance views or longer elevated view of the airport from the AONB is low.

Ecological Impact

The North Somerset and Mendip Bats Special Area of Conservation (SAC) is, at its closest point, 3.2 km west of the application site boundary and there are six SSSI within 5 km; Kingswood (King's Wood and Urchin Wood) (3.2 km to the west), Lulsgate Quarry (2.2 km to the north east), Barrow and Rock Lane Fields (Hartcliff Rocks Quarry) (3.5 km to the east), Goblin Combe (2.1 km to the west), Blagdon Lake (4.1 km to the south east) and Bourne (4.7 km to the south west). Felton Hill and Common Local Nature Reserve (LNR) is located approximately 500 m east of the application site and there are 12 Sites of Nature Conservation Interest (SNCI) within 2 km.

Extensive surveys of the application site were undertaken prior to the construction of the Silver Zone Seasonal Car Park and an Ecological Impact Assessment (including an Extended Phase 1 Habitat Survey) was submitted in support of the 2016 planning application. The baseline surveys confirmed the presence of foraging and commuting bats (including greater and lesser horseshoe bat), badger and an absence of dormouse, reptiles, notable bird species and great crested newt.

The survey results led to an ecological management plan being prepared. This included retained native hedgerows and broadleaved trees, together with a new planted landscape bund (supporting grassland and native trees and shrubs). An artificial badger sett was incorporated into the perimeter bund, which has been successfully colonised and bat and bird boxes were installed. Further ongoing bat surveys in 2018, have reaffirmed the continued use of the landscaped bund by foraging and commuting bats, including greater and lesser horseshoe bats. This indicates that the ecological based landscape mitigation, which includes dark corridors, (where light levels are less than 1 lux) has been successful in providing a suitable habitat for bats. On-going management and maintenance of these features, which is a requirement of the previous planning permission, is being implemented through the Landscape and Ecology Management Plan for the site.

It is not anticipated that the proposal will result in changes to the habitats associated with the site or its perimeter. Further, given that the site is not within an ecologically sensitive area and has no linked pathways to statutory designated sites, it is not anticipated that significant effects will arise during the extended operation of the Silver Zone Seasonal Car Park.

There are no ecological impacts to the proposal.

Traffic / Parking (and related issues)

Some objectors say the proposal will give rise to an increased car parking capacity at the airport and that this is not in the interests of sustainable travel or highway safety.

The purpose of the temporary car parking is however to mitigate car parking that will be temporarily removed while various construction projects take place. The applicants contend that even with the winter use of the seasonal car park, there will be a net reduction in the normal level of winter parking at the airport, although they say the level of deficit can be accommodated at the airport at this quieter time of the year. It is highly unlikely therefore that the proposal will give rise to an increase in car parking at the airport or that vehicle travel to and from the airport, will increase during this period. The only difference is that more traffic is likely to enter the airport car parks via the 'Silver Zone' roundabout entrance over the winter period, but there is no highway objection to this.

BALPA / UNITE raise concerns that relocating airline staff parking to the south side of the airport would (1) result in longer trips for its staff in reaching the car park because most staff travel from the north and (2) that this would, when coupled with added transfer movements from the south to north side, increase trip lengths / numbers for staff. The 2011 does however allow for the removal of the north side staff car park, with replacement car parking on the south side. This would not preclude BAL from allocating BALPA / UNITE members staff parking on the north side of the airport if they wished to do so, but it is a matter for BAL.

Another objector contends that winter use of the seasonal car park will harm air quality on the application site as cold air is more likely to trap vehicle emissions closer to the ground, which could adversely affect ecology. Even if this does occur, the seasonal car park adjoins a vast unrestricted car park, where vehicle activity is ongoing all year round. The potential for this proposal to have a significance adverse impact on the existing air quality, whether the receptor is wildlife or the few residential properties nearby, is insignificant.

Planning Balance

The proposal would harm the openness of the Green Belt during the 2018-19 winter season. However, to not mitigate an extensive temporary loss of car parking during this period is likely to result in significant harm to the business and its customers. BAL has justified a need for temporary replacement car parking and it has demonstrated that this cannot be met in the Green Belt Inset. Furthermore, the quantity of car parking is proportionate to the need.

On balance, it is considered that there are 'very special circumstances' in support of the proposal and that these would clearly outweigh harm to the openness of the Green Belt or any other harm. This accords with paragraph 144 of the NPPF and Policy DM12 (*'Development within the Green Belt'*) of the Sites and Policies Plan.

Recommendations

APPROVE subject to conditions (see draft decision for conditions).

Reason for Overriding Parish Council comments (if appropriate)

As set out in this report

In recommending this application, I have taken into consideration the relevant policies of the Development Plan and the comments made by the consultees and other interested parties and the:

- Natural Environment and Rural Communities (NERC) Act 2006
- Crime and Disorder Act 1998
- Human Rights Act 1998.

Signed: Neil Underhay