28 JAN 2019

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25 January 2019

Dear Mr Underhay

Outline Planning Application 18/P/5118/F: Bristol International Airport

The British Airline Pilots Association (BALPA) have reviewed the information provided with the outline planning application and submit the following representations. BALPA consider that many of the points to which they refer will be applicable to staff employed at the airport in general.

1. You will recall that in its response to planning application 18/P/4007/FUL, which sought the use of the seasonal Silver Zone car parking area on a permanent basis, BALPA and Unite raised a significant issue in relation to the removal of staff parking to the south of the airport, especially in respect of pilots and aircrew.

2. BALPA objects to the outline planning application and the Master Plan upon which it is based on the grounds that the parking strategy is flawed, that the location and amount of future employee car parking has not been considered in a rigorous way and that in turn this will result in the need for more low cost car parking in the Green Belt than can be justified under planning policy. Accordingly, the very special circumstances that are required to justify the significant expansion of parking in the Green Belt do not exist, contrary to the requirements of national planning policy and Sites and Policies Plan Part 1 Policy DM23 'Development within the Green Belt'. The application fails to comply with Core Strategy policy CS11: 'Parking' and Policy DM28 'Parking Standards' of the Sites and Policies Plan Part 1. Continuing the present staff parking arrangements also has safety implications for the airlines, as outlined in paras 5 & 6 below. The reasons for this are set out below.

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Background

3. According to table 4.1 of the Draft Workforce Travel Plan, aircrew working for airlines based at Bristol airport made up 919 of the 2,976 employed full time workforce at the airport (31% of the total employees). However, the number of employees in the table includes those working for Arrow Cars, First Bus and the Bath Bus Company, whose employment may be due to the airport, but they do not work at the airport. Accordingly, the proportion of aircrew as a proportion of staff based at the airport will be larger. The airlines based at Bristol are Easyjet, Ryanair, BMI, Thomas Cook and Tui.

4. The details of the masterplan which formed part of the 2009 outline planning application, proposed the relocation of the staff parking near the old terminal building to the Silver Zone. That detail was not a matter of which staff were made aware at the time. It only subsequently became clear when BAL proposed to close the north side staff car park, despite having sought and gained approval to extend that car park as recently as December 2016 (application 16/P/1440/F). The car park was closed from 1 October 2018.

5. Since then staff have had to find a parking space in a new area reserved for staff in the Silver Zone and catch a shuttle bus back to their workplace. At a stroke this arrangement has added about extra 20 minutes to each journey to and from work for aircrew who currently sign on for their duties at the old terminal building. The implications of this are more significant now than they would have been in 2009 due to the changed shift patterns implemented by the airlines based at Bristol, which require staff to work long days to ensure maximum utilisation of aircraft operated by the airlines based at Bristol. The current parking arrangements also make flight delays, due to staff arriving late on duty, more likely.

6. The current arrangements for airlines are that, as set out in para 4.4.17 of the Draft Workplace Travel Plan, aircraft will operate over an 18-hour day commencing with departures from 0600 and sometimes earlier. Crew start work one hour before departure. Many planes will not stop operating until midnight or later, especially if there have been unexpected delays. Since 2009 pilots working hours have increased by at least 10% due to changed shift patterns. Pilots working these long shifts are required by European Aviation Safety Agency Flight Time Limitation Regulations to have a minimum 12 hours rest before their next Flight Duty period. With the additional travel times taking around 40 minutes off their rest period, whilst pilots may be complying with the Regulations, the amount of time that they have resting will be reduced. The purpose of the Regulations is for the avoidance of fatigue in aircrews. This is of concern to those who have longer commutes to the airport. The 12 hours minimum rest period was designed to ensure an opportunity to achieve 8 hours sleep. A recent crew survey indicated that due to the Silver Zone parking arrangements, 33% of pilots will now be unable to achieve 8 hours sleep if rostered the minimum rest allowance. Ultimately, persistently eating into pilots already minimal rest

time will have a long-term detrimental effect on pilots' fatigue levels, which poses a potential risk to travellers.

7. In addition to the difficulties for staff, it is apparent from the home location of pilots and all employees that at least 60% will be arriving at the airport from the A38 heading south from Bristol. Accordingly, this involves daily additional mileage between the north and south roundabouts by staff vehicles and also a large number of unnecessary movements by buses ferrying staff between the Silver Zone and workplaces on the north side. BALPA calculates this adds up to nearly 150,000 bus miles per annum. Unlike passengers who may be adding road miles to and from the Silver Zone car park very infrequently, staff have to do this daily, which has a noticeable environmental impact.

8. From the perspective of the aircrew, the additional journey time will be increased when they move to the new airline office on the far side of the terminal building, as the bus will drop them at the airport terminal with a further walk from there. BALPA presumes that when Multi Storey Car Park (MSCP) 2 has been built, the shuttle bus will go to the transport interchange on the roof, which will add still further additional time to the work journey if staff parking remains in the Silver Zone.

Future Staff Parking Demand

Planning Policy Context

North Somerset Core Strategy

9. Core Strategy policy CS11 says that adequate parking must be provided and managed to meet the needs of anticipated users (residents, workers and visitors) in usable spaces.

Sites and Policies Plan Part 1

10. Policy DM28 requires development proposals to meet the council's parking standards, but for uses not covered by these standards, provision will be assessed according to individual circumstances, having regard to the transport objectives of the council. Regard will be given to the provisions of any submitted Travel Plan.

11. Development will not be permitted if the car parking arrangements would unacceptably harm the character of the area or the safe and effective operation of the local transport

network. Planning applications must demonstrate to the satisfaction of the council that the functional parking needs of the development can be accommodated on or close to the site without prejudicing highway safety or resulting in an unacceptable impact on on-street parking in the surrounding area.

North Somerset Parking Standards SPD

12. Principle 2 of the North Somerset Parking Standards SPD is that '*Planning applications should include information to demonstrate to the satisfaction of the Council that the parking needs of the proposed development can be accommodated on or close to the site without prejudicing other planning objectives or the operation and safety of the highway network'.*

13. For a use such as an airport, it is not possible to provide relevant parking standards, but devices such as Travel Plans, as required by policy DM28, can help to ensure that a suitable number of spaces can be provided without detracting from the objective of travelling as sustainably as possible.

Staff Parking Requirements

14. There has been an extensive assessment of future passenger parking demand, but employee parking demand has not been given proper consideration. The issues which staff have in getting to the airport by means other than their car have been raised and then ignored in the analysis.

15. The Workplace Travel Plan, Transport Assessment and Planning Statement simply assert that there will be no more parking spaces provided for staff above the level that serves the current workforce (1,000 spaces) at a time when the passenger throughput is only 8.2m, compared with the number of employees that will be required to serve 12m passengers. The Workplace Travel Plan asserts that the modal share of staff travelling in single occupancy vehicles (SOVs) will reduce from the 2017 level of 84% to 75% in 2026, as a result of the Travel Plan initiatives.

16. However, the Workplace Travel Plan, at paragraph 4.4.17, sets out the difficulties that staff have in travelling to work by means other than the car and the difficulties of car sharing. '*The 2017 questionnaire results suggest that 60% of employees work variable shift patterns.....most airlines operating at Bristol operate their flights over an 18 hour day commencing with departures from 0600 onwards. Airline employees will work shift patterns set out in their crew roster, with start and finish times varying from day to day. As an additional complexity, they are unlikely to work with the same people from one day to the*

next. The hours worked by security employees, terminal building concessionaires, handling agents and flight catering will also be related to the flight schedule and hours can vary from day to day. Early shifts will commence between 0300 and 0500 and late shifts will finish around midnight'.

17. Despite the practical difficulties for staff in travelling more sustainably, which the Travel Plan has identified, in order to achieve 25% of staff travelling to work by non SOVs, table 7.1 of the Workplace Travel Plan shows the proportion of staff travelling by bus increasing nearly 50% from 9% to 13 %, in 2026, with car sharing up from 3 to 8%. The Transport Assessment (TA), at table 8.16 demonstrates the predicted start and finish times of employees and highlights the key issue. It shows that 32% of staff will either start or finish work between 2400 and 0700, including early morning hours when airport bus service frequencies are only hourly or absent. Whilst the application through its s106 Heads of Terms proposes improvements to public transport, many of these are vague and it cannot be realistic to forecast such a change in travel habits. Waiting for an infrequent bus in the early hours of the morning for the select few who live on or near the operating airport bus routes would not be anyone's preference.

18. According to the TA, Section 8, 'Forecast Travel Demands', assessments of movement to the airport are made on the assumption that the employee mode share will remain as at present. The purpose is to test a worst-case traffic scenario. However, comparing tables 8.17 and 8.18, the mode share assigned to public transport is actually 10%, not the 9% currently recorded. Table 8.21, at the end of the chapter, has a profile of increased numbers travelling by public transport throughout the day, assuming 15% travel by bus.

19. Whilst it is noted that there have been big improvements in public transport to the airport and other incentives to travel by bus, such as cheap fares for employees, only a limited proportion of the workforce is able to take advantage of these improvements. It is nonsense to expect that the level of bus use by staff will reach 15% during the early hours of the morning. Even 10% during these hours looks hardly achievable given the very limited bus services at this time. The modal share of 25% non SOV use by staff is simply unrealistic. The text to policy CS11 makes the point that *'it is important to recognise that across the district cars are still essential for many journeys. National policy in the past has perhaps naively tended to assume that if less provision is made for the car, then less car use will take place'.* Despite the best efforts to make sustainable travel to the airport possible, it has to be recognised that the location of the airport and the hours that staff have to work will limit this option.

20. The Parking Demand Study considers the future demand for parking that will be due to passenger growth. It only allows for increasing the public transport share for passengers from the current level of 12.5% to 15%. It gives a number of reasons why only a small

increase can be achieved. It gives reasons why passengers will want to continue to park cars at the airport, such as historic customer preference, increasing propensity for leisure passengers to use low-cost parking and growth in the number of aircraft based at the airport, which means that a high proportion of outbound flights leave early in the morning. These same factors will apply to staff.

21. The Transport Assessment (para 8.6.4) states that it is calculated that 58% of FTE staff are at work on any day. An additional 700 FTE staff are forecast for the expansion of the airport from 10m to 12m passengers alone. This increase in staff excludes the growth in employment that will be required to enable growth from the present 8.2m passengers to 10m. The expansion from 10 to 12m alone means in the order of 406 extra staff working per day (58% of 700) but with no extra parking!

22. In 2016, BAL sought and obtained planning permission (ref 16/P/1440/F) to extend the existing staff car park by 196 spaces. The report accompanying that application said '*that Bristol Airport has control of approximately 1,100 car parking spaces and these are fully used at peak periods*'. The majority of this parking was by the admin building, 400 spaces were in the Silver Zone and further small numbers of spaces for key operational staff were available at the Air Traffic Control Tower. Given the shortage of parking for staff then, it is astonishing that the current application makes no provision for additional staff parking.

23. One of the problems of shift work, and especially where staff have to be bussed to and from the car park, is that space is needed to accommodate the new shift before the departing shift has left. This was highlighted in the case for additional parking in application 16/P/1440. It is understood that this already causes problems for staff finding a space to park.

24. There is no consideration in the TA of the build up of parking over the day (as staff arrive and depart) to demonstrate that there will be sufficient parking. Such a table ought to have been prepared to demonstrate future parking needs, taking into account shift changes.

25. To conclude, it is apparent that the amount of parking allowed for staff is far too small even allowing for the continued development of the Workplace Travel Plan.

Location of Staff vs Passenger Parking

26. The Parking Demand Study calculates that an additional 3,900 passenger car parking spaces are required by 2026, on the basis of a modest increase in bus use by passengers from 12.5% to 15%. However, it notes that airport parking only accommodates about 76% of

passengers' cars over the year, with many parked in unauthorised car parks outside the airport, often within the Green Belt. In order to reduce the need for unauthorised off-site car parking in the Green Belt and to respond to the displacement of spaces due to construction activity, a total of 4,850 additional passenger parking spaces are sought in the application.

27. The Parking Demand study and the Parking Strategy which emerges from it, highlight that the demand for additional car parking comes from those seeking low cost rather than premium cost parking. However, the planning strategy is to maximise the number of parking spaces in the Green Belt inset, where Green Belt policy tests do not apply. Consequently, a further multi storey car park is proposed accommodating 2,150 cars.

28. The current masterplan includes two multi storey car parks in the Green Belt inset. The construction of MSCP 1 is being undertaken in 2 phases due to limited demand for premium cost parking. The completion of phase 2 of MSCP1 and the two further MSCPs, will provide a further 4,366 premium parking spaces. The balance of additional low-cost spaces to be provided relative to premium spaces is contrary to the analysis in the Parking Demand study and Parking Strategy. Because of the preponderance of additional premium spaces to be provided, the Parking Strategy proposes expanding the low-cost parking in the Green Belt first and building MSCP 3 later.

29. Apart from staff working in the new admin building under construction on the south side, the location of parking requires a further journey by bus, when the majority of staff will already have driven past the airport.

30. Unlike the passenger parking which is largely block parked, staff parking needs to be in conventional parking layouts with aisles for ready access. So, whilst there may be 1,000 parking spaces for staff in the Silver Zone, the spaces they occupy could be more intensely parked providing about 1,400 low cost passenger spaces.

31. BALPA surveyed the use of the new MSCP in June and July and noted that there were on average at midday during June and July 460 and 540 free spaces respectively. Discounted prices were used to reduce free spaces in August. This confirms the demand for low cost rather than premium parking at the airport. Given the lack of demand for 'premium' rate parking from an airport that has predominantly leisure rather than business passengers, it remains to be seen whether the additional multi storey car park can be filled without discounting the price.

32. As BALPA urged in its representations on application 18/P/4007/F, staff parking should be moved from the Silver Zone to the northside of the airport to enable greater provision of low-cost parking for passengers in the Silver Zone area, in line with the Parking Demand study. This would then avoid the need for early incursions into the Green Belt to extend the Silver Zone car park and would reduce the area required for parking overall.

33. Accordingly, 'very special circumstances' cannot exist to justify the strategy of expanding low cost parking into the Green Belt whilst the parking in the Green Belt is being used inefficiently and accommodating staff who could be parked northside, where there will be spaces provided that are hard to fill.

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Conclusion

34. BALPA's assessment has demonstrated that the application has ignored the key issues which will limit the ability of staff to significantly further reduce travelling in single occupancy vehicles and take no account of the impact of not just the additional 700 staff required for the growth of the airport from 10m to 12m passengers, but the increase from the present 8.2m to 10m target. Accordingly, the application proposals conflict with development plan policies CS11 and DM28.

35. Secondly, the location of staff parking is adding significant additional time and unnecessary mileage to the journey to work for staff. The location of staff car parking is using space inefficiently in the airport's low-cost parking area, where the airport wishes to prioritise expansion. Expanding the Silver Zone parking area into the Green Belt would be inappropriate development but this letter has shown that this can be mitigated by moving the staff parking to the northside of the airport. 'Very special circumstances' cannot be demonstrated, as required in accordance with national policy and development plan policy DM12, with the present masterplan proposals.

36. The application has also failed to address practical airline industry safety issues of truncated pilot rest time and consequent fatigue risks resulting from the additional travel time exacerbating already stretched operational duty hours.

37. We would welcome the opportunity to discuss this objection with you in due course.

Yours sincerely,



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Head of Organisation
BALPA

Cc: Councillor Deborah Yamanaka, Wrington Ward

Councillor Peter Crew, Chair of Planning Committee

Dr Liam Fox MP

Andrew Goodenough, Development Director, Bristol Airport

Mr A. Renshaw, Planning Consultant