

Town and Country Planning Act 1990
Appeal by Bristol Airport Limited
Bristol Airport, North Side Road, Felton, Bristol

Appeal Reference: APP/D0121/W/20/3259234
Planning Application Ref: 18/P/5118/OUT

Andrew Renshaw MRTPI
Summary of Proof of Evidence
Green Belt and Car Parking

Ref: BALPA W/1/3
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1 INTRODUCTION

- 1.1.1 My name is Andrew Renshaw. I am a chartered town planner, and have been in practice in the town planning profession for the last 40 years, in both public and private sectors. Most recently I was Senior Associate Town Planner at a multi-disciplinary practice encompassing architecture, town planning, building surveying, landscape architecture amongst other disciplines.
- 1.1.2 I hold an MA in Environmental Planning from Nottingham University and have been a member of the Royal Town Planning Institute for over 35 years. I have been acting for BALPA since September 2018 when I was first approached in respect of an earlier planning application related to airport car parking.
- 1.1.3 BALPA's case is specifically concerned about the location of staff parking, with particular reference to pilots and air crew. My evidence together with John Hatton and Simon Williams will demonstrate that the location of staff parking within the southern area of the airport, within the Green Belt and which requires a shuttle bus to transfer staff to the terminal:
- (i) undermines the very special circumstances ('VSC') case advanced by the Appellant in respect of the additional car parking proposed in the Green Belt; and
 - (ii) due to the potential health and safety implications for aircrew as a result of the pressure placed on their rest periods, is in breach of the requirement of Core Strategy Policy CS11 that parking is "adequate...to meets the needs of anticipated users".

2 RECENT PLANNING HISTORY IN RESPECT OF CAR PARKING AT BRISTOL AIRPORT

PLANNING APPLICATION 09/P/1020/OT2

- 2.1.1 Despite the exclusion of 44.2 hectares of land on the northside of the airport from the Green Belt, the 2011 planning permission (CD4.1b) did allow for some future development in the Green Belt. In particular this included an extension to the Silver Zone parking area, including a seasonal overflow parking area.
- 2.1.2 The council decided that the extension to the Silver Zone car parking area (in the Green Belt) was justified under the 'very special circumstances' exception. It was considered that the GBI area would be intensively developed, including two multi storey car parks and that further development, that was believed to be necessary

to accommodate the airport's expansion, could not reasonably be provided in that location.

2.1.3 The outline planning permission contained conditions specifically related to the phasing of the additional car parking proposals, with the intention that the expansion of car parking in the Green Belt would only occur after the additional provision in the GBI had been implemented and when key passenger throughput levels had been reached, thereby ensuring that priority is given to development in the Green Belt inset area.

2.1.4 Among the changes to the Silver Zone area was for part to be used for staff parking. At the time of the outline planning permission, the majority of staff car parking was situated adjacent to the administration building at the eastern end of the runway.

PLANNING APPLICATION 16/P/1440/F

2.1.5 Notwithstanding this situation, in 2016, Bristol Airport sought planning permission for additional staff car parking spaces adjacent to the existing staff car park within the northern area of the airport, due the increase in employment and the number of contractors.

2.1.6 At that time the administrative offices and the reporting point for aircrew were then in the old terminal building. Altogether there were 1,000 general staff car parking spaces available, with some car parking spaces for key operational staff available at the Air Traffic Control Tower. The airport considered it appropriate for additional staff car parking to remain adjacent to the main administrative building and terminal and development sites.

PLANNING APPLICATION 16/P/1455/F & 16/P/1486/F

2.1.7 The first five storey multi storey car park building, was now proposed to be built in two phases. This was considered justified on the assessment of increased demand for lower cost parking between 2011 and 2016 and the reduced occupancy of the higher cost parking northside during this time.

2.1.8 At the same time BAL sought planning permission for the seasonal car park, providing 3,650 spaces to be provided earlier than permitted under the phasing conditions of the outline planning permission. The arguments put forward for this change in the phasing were the same as given for the MSCP application outlined above. The application was approved.

CONSULTATION REQUEST 18/P/3919/AIN & VARIATION OF CONDITION APPLICATION 18/P/4007/FUL

- 2.1.9 Submission reference 18/P/3919/AIN, was a consultation by BAL with the planning authority. This concerned the erection of a staff waiting area building, as part of the move of staff car parking from the east apron to part of the Silver Zone area.
- 2.1.10 BALPA, together with Unite argued that planning permission was required, as they said it countermanded a planning condition attached to an earlier planning application and also requested the council to ask BAL to consider an alternative strategy for staff parking.
- 2.1.11 Whilst accepting the position, North Somerset Council asked BAL how the estimated 140 existing car parking spaces to be lost as a result of this development would be replaced. This concern had been exacerbated by an earlier proposal for a new airport administration building, 18/P/3206/AIN under the permitted development procedure. This was to be in the Silver Zone, which was not in accordance with the proposed site plan illustrated with the outline planning permission.
- 2.1.12 The planning officer's report accepted that the proposed 3 storey building benefitted from permitted development rights, but sited so close to the A38, noted that it would have a detrimental impact on the openness of the Green Belt.
- 2.1.13 Shortly after the consultation submission 18/P/3919/AIN, application 18/P/4007/FUL sought permission for all round use of the seasonal car park for a temporary period of one year. BAL justified this variation to condition 9 of the outline planning permission 09/P/1020/OT2 on the grounds that there were so many development projects underway in the GBI that there would be insufficient car parking available during the winter months.
- 2.1.14 Had the multi storey car park been constructed in accordance with the conditions of the original planning permission, it is likely that this situation would not have arisen.
- 2.1.15 In October 2018, staff car parking was moved from the area close to the former terminal building to the Silver Zone.

2.2 CONCLUSIONS FROM THE PLANNING HISTORY

- 2.2.1 I draw the following conclusions in respect of the planning history in relation to car parking.

- Provision of low cost car parking has always been a priority for BAL;

- Commercial arguments in favour of the provision of low cost parking have led to delays to MSCP provision;
- When additional staff car parking was sought in 2016 it was acknowledged by BAL that northside of the airport was the best location, as it would reduce worker trips during the day;
- No consideration was given to the planning and transport implications of moving staff car parking southside in previous applications;
- BAL's proposals for the administrative building in the Silver Zone led to lost parking capacity there; and
- The location of parking was noted as relevant in application 16/P/1440/F, when BAL sought additional staff car parking and to the construction of the new airport administrative building in the Silver Zone parking area (18/P/3206/AIN).

3 BAL'S CASE

3.1 DEMAND FOR LOW COST CAR PARKING AT BRISTOL AIRPORT

3.1.1 BAL accepts that the further extension of the Silver Zone car park and proposed year round use of the existing Silver Zone car park extension constitutes inappropriate development in the Green Belt, but sets out a case for there being 'very special circumstances' that override the potential harm to the Green Belt:

- The need for additional low-cost parking to meet demand associated with an additional 2mppa and to address the impacts of unauthorised parking in the Green Belt, as part of a holistic approach to sustainable travel;
- The lack of alternative, available and suitable sites for parking outside the Green Belt; and
- The need for and benefits of growth of Bristol Airport.

3.1.2 The appellant's case regarding expanding car parking in the Green Belt is constructed around the need to expand 'low cost' parking because BAL argues that this is the primary need and lack of provision would result in more cars being parked off site in unauthorised car parks to the detriment of the environment and the openness of the Green Belt.

THE PARKING STRATEGY

3.1.3 The strategy identified the need for a total of 4,850 additional parking spaces. Taking into account the context and Green Belt policy, a sequential approach was adopted to the location of the additional parking. Firstly, sites within the GBI were considered; secondly, strategic park and ride locations remote from the airport

outside the Green Belt; thirdly, sites within the airport but outside the GBI; and finally, sites in Green Belt locations adjacent to the airport.

- 3.1.4 It considered a long list of possible off-site parking locations outside the Green Belt to make up the balance of the parking spaces, but none were considered realistic to serve the airport.
- 3.1.5 Taking into account visual impacts, the strategy proposes an additional MSCP in the GBI, to provide about 2,150 spaces. An additional 2,700 spaces are also proposed on land immediately to the south of the seasonal car park site. BAL maintains this approach maximises development in the GBI.
- 3.1.6 A further 1800 premium parking spaces in an MSCP are still to be constructed as part of the extant planning permission. There is no indication as to when this might now occur and BAL says there is insufficient demand to bring this forward before the provision of additional low cost parking in the Green Belt, for which there is said to be an immediate need.
- 3.1.7 North Somerset Council contends that only 3,200 additional passenger parking spaces are required if a passenger public transport target of 17.5% is achieved by 12m passengers pa. However, this has not led to a reduction in the amount of car parking proposed to be provided in the Green Belt in the appeal application.

6 BALPA OBJECTIONS TO THE APPEAL APPLICATION

4.1 UNNECESSARY DISPLACEMENT OF 'LOW COST' PASSENGER PARKING IN THE SILVER ZONE

- 4.1.1 BALPA's objection to the appeal application argued that the 1000 spaces now occupied by staff could be made available to meet 'low cost' parking demand and that 2700 additional low cost spaces in an extended Silver Zone car park in the Green Belt is not, therefore, justified. BALPA estimates that if used for the block parking of passenger cars, 1400 car spaces could be made available in the Silver Zone by relocating staff car parking back to the northside, where the majority of staff work. This argument undermines the appellant's 'very special circumstances' case for additional development in the Green Belt.
- 4.1.2 BAL's approach to use of the Silver Zone parking area does not support its 'strong commitment' to maximising development in the GBI, because of.
- the development of its administrative offices at the entrance to the Silver Zone (section 3.2 of this proof);
 - delays to the building out of the approved multi storey car parks;

- the appellant's Insistence in providing 3,900 additional spaces, rather than the 3,200 North Somerset Council consider appropriate; and
- the failure to respond to BALPA's strategy of making more efficient use of the staff car parking area.

4.1.3 Surveys undertaken by BALPA in June and July, 2018 showed there was unused car parking north side during the peak summer period which had to be discounted to be filled.

4.1.4 BALPA's analysis also suggests that the apparent loss of income from staff occupying long stay or premium parking spaces northside would, at most peak times be no more than that lost from occupying space in the Silver Zone. This excludes the additional cost to BAL of providing buses and drivers to transfer staff from the parking area to the terminal buildings and vice versa.

4.2 UNNECESSARY ADDITIONAL VEHICLE MOVEMENTS

4.2.1 I calculate that some 60% of the staff will approach the airport from the north. BALPA's own survey of its pilots' journey to work shows the figure approaching from the north to be 65%. Parking southside creates additional unnecessary vehicle movement on the A38 past the airport.

4.2.2 A separate park and ride service is provided for staff, running every 10 minutes except during night time hours, when the frequency is reduced. BALPA has calculated that over 150,000 unnecessary additional park and ride vehicle miles per annum could be saved by staff parking northside.

4.3 STAFF TRAVEL TO WORK ISSUES

4.3.1 The draft Workplace Travel Plan, (CD2.10 para 4.4.17), sets out the difficulties that staff have in travelling to the airport by means other than the car and the difficulties of car sharing . This is the result of shift patterns, with airline employees start and finish times varying from day to day and 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.

4.3.2 Furthermore, aircrew working 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 as set out in Simon Williams' proof of evidence, which

then considers the additional travel times and the implications for pilots and cabin crew of the staff parking arrangements in the Silver Zone.

4.4 ADEQUACY OF LONG TERM STAFF PARKING PROVISION

- 4.4.1 The future provision for staff remains unchanged in the planning application proposals. The target for single occupancy car travel by staff set in the Travel Plan has been raised to 70% following negotiations between the planning authority and BAL.
- 4.4.2 Neither the planning authority nor BAL have recognised the difficulty that employees working unsocial shifts have in travelling to or from the airport by sustainable means.
- 4.4.3 No calculations have been undertaken to show whether a 70% target for sustainable travel would actually reduce the staff parking demand if it was met.
- 4.4.4 Even if the 70% single occupancy vehicle target can be met overall, the increase in employment suggests strongly that there will be a need to make further parking space available. If it is provided in the Silver Zone, this will further reduce 'low cost' public passenger spaces and is a further reason for staff parking northside. The implication is that BAL will then seek to expand low cost parking further into the Green Belt.

4.5 POLICY CS11

- 4.5.1 The approach to staff parking is contrary to policy CS11 (CD5.6). This policy requires that '*Adequate parking must be provided and managed to meet the needs of anticipated users (residents, workers and visitors) in usable spaces*'.
- 4.5.2 The council is committed to sustainable development, but recognises that '*across much of the district cars are still essential for many journeys*'. The Core Strategy states that it is naïve to assume that if less provision is made for the car, this will necessarily result in less car use. Given the location of the airport and the shift patterns worked, many staff will have good reason to travel to work by car.
- 4.5.3 The only staff for whom the parking arrangement meets the requirements of CS11 are those working for BAL, whose offices happen to be adjacent to the car park. These office based staff are more likely to work normal hours and hence more likely to be capable of travelling in a more sustainable mode.

5 RESPONSE OF NORTH SOMERSET COUNCIL AND BRISTOL AIRPORT

- 5.1.1 In November 2019, officers raised the issue of staff parking southside, whilst the majority worked airside, and asked BAL to consider locating staff parking to be

better related to the workplace of the majority of staff, 'with a view to reducing staff trips on the A38'.

5.1.2 The council requested, inter alia, the following from BAL:

- *'NSC requires BAL to detail their specific plans for public transport improvements for staff travel including to serve shift patterns around early morning/late night flight peaks.*
- *Consideration should be given by BAL of staff parking locations relative to staff working locations and justification provided, including detail for any changes proposed within the Workplace Travel Plan. As parking will be less available to staff, clear proposals are required on how demand and supply will be managed by BAL not only for BAL staff but for employees of all companies on site. It is recommended BAL bring forward a review of airport-wide staff car park charging to encourage less car use and to drive increases in public transport and smarter choices'.*

5.1.3 In the same document, officers argued that the target for public transport use by passengers should be 17.5%. This would reduce the amount of additional parking required to 3,200 spaces, subject to future review.

5.1.4 Whilst BAL agreed a list of public transport improvements to the airport, 3,900 additional parking spaces was still required by BAL.

5.1.5 BAL also committed to a new travel plan agreeing to a raised target of 30% of staff travelling by sustainable modes, including a review of employee parking charges and an employee travel card to encourage sustainable travel. There was no response at all to the request to review the location of staff parking. There was no consideration to the health and safety implications of the parking arrangements raised in BALPA's objection. Neither the planning authority nor BAL recognise the difficulty that employees working unsocial shifts have in travelling to or from the airport by sustainable means.

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5.1.6 Although this report referred to moving some of the 1,000 spaces to the north side of the airport being 'more sustainable', it nonetheless considered without any

justification the amount and distribution of staff car parking at the airport to be *'reasonable'*.

5.1.7 This misses the crucial planning points that BALPA have been making in their representations:

- Firstly, that staff are occupying the very spaces that BAL needs for low cost passenger parking;
- That this means that unnecessary additional Green Belt land is given over to low cost car parking;
- That it results in additional and longer trips on the road network;
- The potential implications of the failure to allow any increase in staff car parking; and
- That there are genuine health and safety implications for aircrew.

6 PLANNING POLICY CONCLUSIONS

VERY SPECIAL CIRCUMSTANCE 1 - NEED FOR ADDITIONAL LOW COST PARKING IN THE GREEN BELT

6.1.1 BALPA's case suggests that 1,400 'low cost' car parking spaces could be found immediately by moving staff parking northside.

6.1.2 Even if an allowance was made for the admin office staff and only 860 of the staff spaces were relocated from the Silver Zone northside, allowing for block parking, some 1200 additional spaces could be made available for low cost passenger parking. As North Somerset Council envisage a requirement for only 3,200 additional passenger spaces, together this approach would reduce the amount of parking needed to be provided in the Green Belt 1,900 to 1,300 spaces. In other words there would only be a residual need for a very limited incursion into the Green Belt, even at 12mppa.

6.1.3 In respect of the health and safety evidence raised by BALPA, if the Green Belt argument is rejected, there is a case for around 400 car parking spaces for aircrew to be moved from the Silver Zone to the northside. This would yield a potential 560 extra low cost spaces if block parked by passengers' cars.

6.1.4 BALPA has demonstrated that staff parking northside is likely to have no adverse financial impact for BAL. By using space here more intensively, by including staff car parking there, this is likely to lead to greater demand for the use of MSCP space by those willing to pay for premium parking.

VERY SPECIAL CIRCUMSTANCE 2 - NO FURTHER SUITABLE AND AVAILABLE SITES OUTSIDE THE GREEN BELT

- 6.1.5 In promoting arguments in favour of the extension of parking in the Green Belt, the appellant notes that it is well located from an operational perspective, allowing car parking to the south of the airport to be consolidated in one location. BALPA's proposal achieves the same situation. Secondly BAL argues that the phase 2 site benefits from existing services and facilities associated with the Silver Zone car park. The same applies to the current staff car parking area. BAL says that the phase 2 site is well suited to block parking, where public access is not required. The same situation applies to the staff car parking area.

VERY SPECIAL CIRCUMSTANCE 3 - NEED FOR, AND BENEFITS OF, THE GROWTH OF BRISTOL AIRPORT

- 6.1.6 With BALPA's solution, the benefits of airport growth, as set out in BAL's Statement of Case, can be achieved without the need for the impact on the harm that its proposals currently cause to the Green Belt

6.2 CAR PARKING POLICY CS11

- 6.2.1 Not only is the continuation of staff parking arrangements in the Silver Zone contrary to Green Belt policy DM12, but it is also contrary to CS11. The parking provided is remote from the place of work for the majority of staff when there is an alternative. The location of the airport in the countryside and the shift patterns worked, staff will have good reason to travel to work by car.
- 6.2.2 The only staff for whom the parking arrangement meets the requirements of CS11 are those working for the appellant.

6.3 CONCLUSIONS

- 6.3.1 The existing car parking arrangements for staff formed part of the changes envisaged in outline planning permission 09/P/1020/OT2. However, BALPA's case demonstrates the adverse impacts of that change. The full implications of this were not appreciated by the planning authority at the time.
- 6.3.2 It is clear that changes to the parking strategy at the airport have occurred for a number of reasons, which are relevant to the determination of the appeal:
- There has been a significant change from the early provision of parking in MSCPs to the early development of 'low cost' parking in the Green Belt;
 - The relocation of staff parking has reduced the availability of 'low cost' parking; and

- Other changes, such as the development of BAL's administrative offices in the Silver Zone area, have reduced car parking.

6.3.3 There is a simple solution to reducing the impact of car parking on the openness of the Green Belt by a reallocation of parking spaces. This will make better use of the Green Belt inset for parking given the spare parking capacity identified there.

6.3.4 Accordingly, I ask that the Inspectors should give weight to BALPA's case and the means by which it might be remedied should they be minded to uphold the appeal and grant planning permission for the development.